


1 B J Fadem Esq. SBN: 118819*
*Certified Family Law Specialist - State Board of Specialization
2 Scott A. Reno, Esq. SBN: 315247
Erika A. Lee, Esq. SBN: 332907
3 Jack O'Hollearn, Esq. SBN: 352091
LAW OFFICES OF B J FADEM & ASSOCIATES, APC
4 111 West Saint John Street, Suite 700
San Jose, CA 95113
5 Telephone: 408-280-1220
Fax: 408-971-9940
6 bjfadem@fademlaw.com

ELECTRONICALLY FILED
8/15/2024 5:16 PM
Superior Court of California
County of Mendocino

By: 
Shanae Thibeau
Deputy Clerk

7 **Attorneys for Petitioner,**
8 **MYLEA LOGIN**

9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF MENDOCINO

11 MYLEA LOGIN,
12 Petitioner,

13 vs.

14 CARLOS ALBERTO ESPARZA DE LA
15 TORRE,
Respondent.

Case No.: 23FL00613

PETITIONER'S TRIAL BRIEF

Date: August 22, 2024

Time: 10:30am

APJ: Hon. Patrick Pekin

Dept: A

16 **I. FACTUAL AND PROCEDURAL HISTORY**

17 The Petitioner, MYLEA LOGIN (hereinafter "Mylea") and Respondent, CARLOS
18 ALBERTO ESPARZA DE LA TORRE (hereinafter "Carlos")¹. The parties were in a romantic
19 relationship but never married. They have one child of their relationship, ILEANA ESPARZA
20 LOGIN (hereinafter "Ileana") (age 5). Mylea fled Mexico with Ileana on or about August 15,
21

22
23 ¹ The parties first names are being used throughout this brief for the purpose of providing personal, gender neutral
references, and not out of disrespect.

1 2023 2024 to seek refuge and protection in California from Carlos and his family. On August 15,
2 2023, Mylea filed a Request for a Domestic Violence Restraining Order against Carlos while she
3 was self-represented and with the assistance of the self-help clerk. The court issued a Temporary
4 Restraining Order, protecting both Mylea and Ileana from Carlos, with no contact or visitation to
5 Carlos pending a hearing.

6 At the time Mylea obtained her Temporary Restraining Order (hereinafter “TRO”),
7 Carlos lived in Bucerias, Mexico. Therefore, Mylea was required to facilitate service via the
8 Central Authority in Mexico under the Service Aspects of the Hague Convention. Due to the
9 nature of the delay in serving through the Central Authority, Mylea had difficulty serving Carlos.
10 Carlos became aware of the Request for a DVRO and TRO in early 2024. He subsequently
11 retained counsel to represent him at the hearing on April 2, 2024.

12 After obtaining counsel, Carlos filed a Motion to Quash Service (prior to being served)
13 and for lack of jurisdiction.

14 In order to resolve some of the procedural issues, counsel for both parties agreed to
15 accept email service of the unserved pleadings. Carlos accepted email service of Mylea’s
16 Request for a DVRO and Mylea accepted email service of the Motion to Quash. Service of the
17 Request for a DVRO was effectuated on April 25, 2024. This matter trailed for several hearings
18 to determine the order in which the Court would hear the issues before it and for the Court to
19 appoint Minor’s Counsel, Daniel Beck, to conduct an investigation and represent the minor child
20 in the proceedings.

21 Mr. Beck conducted an extensive investigation and provided his initial report to the court
22 for the hearing on June 25, 2024. On July 18, 2024, counsel stipulated to Mr. Beck’s report to be

1 admissible as evidence for the DVRO trial. In his initial report, Mr. Beck outlines his concerns,
2 collateral contacts, and recommends that the parties attempt to reach a settlement for the best
3 interest of the minor child.² All counsel met and conferred regarding settlement, however,
4 Carlos' counsel represented she had been unable to reach her client and his family to discuss
5 settlement and therefore requested a continuance. At the hearing on June 25, 2024, Mr. Beck
6 relayed to the court that counsel had a productive meet and confer, but Carlos' counsel needed
7 additional time to discuss settlement with her client and his family. Carlos' counsel confirmed
8 this representation, and all counsel agreed to continue the hearing to July 18, 2024 to enable
9 Carlos' counsel time to discuss the settlement discussion with her client and his family.

10 However, on the same day as this hearing (i.e. June 25, 2024), Carlos and his counsel
11 filed a Hague Petition for the Return of the Minor Child and a request for a No Notice *Ex Parte*
12 Order for immediate pick up of the minor child with assistance of the U.S. Marshall in the
13 United States Court for the Northern District of California. The Federal Court issued an Order to
14 Show Cause regarding Jurisdiction, and Carlos' counsel filed a declaration in response providing
15 additional information regarding jurisdiction. Despite having a Temporary Restraining Order to
16 protect her address and location and Mylea having filed a Declaration with the State Court for an
17 address for service (which Carlos' counsel provided to the Federal Court), Carlos used his
18 counsel, a third party, to proactively search for and obtain Mylea's protected, confidential
19 residential address. Carlos' counsel used LexisNexis, an attorney only tool, to obtain the address,
20 and used a "process server" to verify this address. This report was attached to Carlos' counsel's

21 _____
22 2 It is important to note that since Mr. Beck interviewed Mylea's contacts in Mexico and included their reports as a
23 part of the corroborating evidence in his report, several contacts have become unavailable and unwilling to testify as
witnesses, including Mylea's attorney in Mexico.

1 declaration and published into the public record. Mylea’s counsel put the court on notice of this
2 violation of the temporary restraining order in the Declaration of Erika A. Lee re Updates for the
3 Court, filed on July 12, 2024.

4 Between the June 25, 2024 hearing and the hearing on July 18, 2024, Carlos and his
5 counsel continued to use the Federal Court action to try and circumvent the TRO. The most
6 egregious examples are: (1) The judge in the Federal Hague proceeding ordered the parties to
7 “meet and confer” to explore settlement of the matter. Carlos and his attorney refused to engage
8 in any fruitful discussions absent Mylea participating in the same room as Carlos. Counsel
9 suggested that to comply with the current TRO, Mylea would participate in the settlement
10 discussions by being in a separate “zoom room”. Carlos and his attorney refused and repeatedly
11 demanded her to be in the same room with Carlos – either physically or on zoom; and (2) After
12 refusing Mylea’s proposal for supervised visitation, which minor’s counsel agreed to, Carlos and
13 his attorney demanded zoom visitation with Ileana all counsel present on multiple occasions.

14 The District Attorney filed a Hague Petition for Return of the Minor Child in Mendocino
15 County on July 10, 2024. A hearing on the State Hague Action was set for July 18, 2024.

16 In anticipation of the hearing on July 18, 2024, Mr. Beck submitted a supplemental
17 report, which provided key updates to the court and deep concerns for Ileana in light of Carlos’
18 questionable litigation tactics and his clear communication that he would not act in Ileana’s best
19 interest, only having his own interests at heart.

20 At the hearing on July 18, 2024, the court dealt with all pending issues before it and
21 determined that the appropriate next steps were to set trial on Mylea’s DVRO, following the
22 guidance of *Fernandez v. Abin* (2011) 191 Cal.App.4th 1015.. The court discussed the

1 interrelationship between the Hague Petition(s) and the DVRO, and determined that conducting
2 the DVRO trial was appropriate and prudent, while the Hague action was still pending. The court
3 provided its reasoning and relied on authority provided in *In re Marriage of Emilie DLM &*
4 *Carlos C* (2021) Cal.App.5th 76. The court also acknowledged that based on *Abin*, it needed to
5 address the DVRO before taking any further action, including addressing the Motion to Quash
6 (which was directly addressed in the *Abin* decision). The court further determined it was
7 necessary and appropriate to communicate with the court in the foreign jurisdiction under Family
8 Code Section 3424. The court stayed the State Hague Action in light of the Federal Hague
9 Action, and set trial on Mylea’s DVRO for August 22, 2024 at 10:30am in Department A. The
10 court admonished Carlos, informing him that a violation of the TRO would make the decision
11 simple. The parties and counsel stipulated to admissibility of Minor’s Counsel’s original report
12 for all purposes at the hearing, without further testimony; however, Carlos’ counsel refused to
13 stipulate to Minor’s counsel’s supplemental report.

14 In the afternoon on August 12, 2024, only a few days before the deadline of trial briefs,
15 exhibits, and witnesses, Carlos’ counsel emailed Mylea’s counsel suggesting that they file a joint
16 brief to inform the court that moving forward with the DVRO trial violates Article 16 of the
17 Hague. Mylea’s counsel denied the proposal for a joint brief, disagreeing with her legal position
18 and indicating that the court had already acknowledged and ruled on this issue; a DVRO trial
19 was clearly not a violation of Article 16 of The Hague Treaty. Further requests and discussions
20 were conducted via email on August 13, 2024, and a mention of an ex parte, wherein Mylea’s
21 counsel re-iterated that it was collateral estoppel regarding this issue and advised that if an ex
22 parte was pursued in this regard, Mylea’s counsel would seek sanctions accordingly.

1 At 11:30pm on August 13, 2024, Carlos' counsel filed an *ex parte* application in the
2 ***Federal Court to Stay the proceedings in the State Court***. The parties were already scheduled to
3 appear in Federal Court for a hearing on August 14, 2024. At the hearing on August 14, 2024 in
4 the Federal Court, Judge Orrick admonished Carlos and his counsel for the filing of the *ex parte*,
5 stating that the delay in seeking relief was enough reason on its own to deny the *ex parte*, and
6 appeared to be "gamesmanship of the most transparent type". Judge Orrick went on to
7 acknowledge that the State Court had clear jurisdiction to decide the DVRO, and its
8 determination would be very helpful in making the determination on the Hague Action. Judge
9 Orrick requested briefing from the parties and counsel on which court would be better situated to
10 ultimately determine the Hague Action, or more appropriate under the law, given the concurrent
11 actions. Judge Orrick expressed his concern that the best interest of the child was not the focus of
12 the parties. After Judge Orrick expressed this concern, Carlos and his counsel relayed that the
13 best interest of the child was not a consideration of the Hague. Judge Orrick was extremely upset
14 by this comment and admonished Carlos and his counsel to consider the human rights in this
15 case and informed them that their position tells him something about how this matter has been
16 litigation and Carlos' perspective, which was appalling. It is important to note the litigation
17 tactics engaged in by Carlos between the federal and state courts in the context of Mylea's
18 request for a DVRO and Judge Orrick's determination and characterization of such in that
19 Carlos' domestic violence abuse of Mylea has clearly continued in the litigation arena.

20 The parties are set for trial on Mylea's Domestic Violence Restraining Order on August
21 22, 2024 in Department A. Mylea is requesting that the court grant her request for a 5-year
22 Domestic Violence Restraining Order with Ileana as a protected party due to the physical abuse,

1 sexual abuse, threats, and coercive control she underwent during and after their relationship,
2 which has severely affected Ileana. Carlos' violations of the TRO, conduct throughout these
3 proceedings, and clear litigation abuse support and corroborate Mylea's request for Domestic
4 Violence Restraining Order.

5 **II. LEGAL ARGUMENT**

6 The purpose of the Domestic Violence Protection Act (DVPA) is to prevent acts of
7 domestic violence, abuse, and sexual abuse and to provide for a separation of the persons
8 involved in the domestic violence for a period sufficient to enable these persons to seek a
9 resolution of the causes of the violence. Cal. Fam. Code 6220. Under the DVPA, a court is
10 authorized to issue a protective order to restrain any person for the purpose of preventing a
11 recurrence of domestic violence and ensuring a period of separation of the persons involved upon
12 reasonable proof of a past act or acts of abuse. *In re Marriage of Davila & Majia* (2018)
13 Cal.App.5th (citing Fam. Code Section 6300).

14 "Abuse" under the DVPA is defined as intentionally or recklessly cause or attempt to
15 cause bodily injury, sexual assault, to place a person in reasonable apprehension of imminent
16 serious bodily injury to that person or another, or to engage in any behavior that has been or
17 could be enjoined under Section 6320. Abuse is not limited to the actual infliction of physical
18 injury or assault. Cal. Fam. Code Section 6203.

19 Behavior that has been or could be enjoined under Section 6320 includes molesting,
20 attacking, striking, stalking, threatening, sexually assaulting, battering, falsely impersonating
21 another, harassing, telephoning, destroying personal property, contacting (directly or indirectly),
22 by mail or otherwise, coming within a specific distance of, or disturbing the peace of the party.

1 Cal. Fam. Code Section 6320. “Disturbing the peace of the other party” refers to conduct that,
2 based on the totality of the circumstances, destroys the mental or emotional calm of the other
3 party. Cal. Fam. Code Section 6320(c). “This conduct includes, but is not limited to, coercive
4 control, which is a pattern of behavior that in purpose or effect interferes with a person’s free
5 will and personal liberty.” *Id.*

6 Cal. Fam. Code Section 6320(c) enumerates examples of coercive control, which are not
7 limited to:

- 8 (1) Isolating the other party from friends, relatives, or other sources of support.
- 9 (2) Depriving the other party of basic necessities.
- 10 (3) Controlling, regulating, or monitoring the other party's movements, communications,
11 daily behavior, finances, economic resources, or access to services.
- 12 (4) Compelling the other party by force, threat of force, or intimidation, including threats
13 based on actual or suspected immigration status, to engage in conduct from which the
14 other party has a right to abstain or to abstain from conduct in which the other party has a
15 right to engage.
- 16 (5) Engaging in reproductive coercion, which consists of control over the reproductive
17 autonomy of another through force, threat of force, or intimidation, and may include, but
18 is not limited to, unreasonably pressuring the other party to become pregnant, deliberately
19 interfering with contraception use or access to reproductive health information, or using
20 coercive tactics to control, or attempt to control, pregnancy outcomes.

21 A DVRO may be issued where the petitioner proves by a preponderance of evidence that
22 there has been an act of abuse. *Cooper v. Bettinger* (2015) 242 Cal.App.4th 77, 99; *Hatley v.*

1 *Southard* (2023) 94 Cal.App.5th 579. The testimony of the person requesting the restraining
2 order alone is sufficient evidence for the court to issue a DVRO. *In re Marriage of Fregoso &*
3 *Hernandez* (2016) 5 Cal.App.5th 698, 703 (confirming that the testimony of one witness, even
4 that of a party, may constitute substantial evidence); see also Fam. Code Section 6300.

5 Further, a court cannot deny a request for a DVRO based on the amount of time that has
6 lapsed between the most recent incident of abuse and the request for protection, nor can it be
7 denied because the parties had contact between the physical violence and the filing of the
8 DVRO. The appellate court has quickly corrected erroneous denials of a DVRO based on a lag
9 between the abuse and a protective order application, noting that survivors of abuse respond and
10 process their abuse in various ways. In *Vinson v. Kinsey*, the trial court denied the issuance of a
11 DVRO based, in part, on the fact that the main incident of abuse occurred in March of 2022 and
12 the petitioner did not file her request until April 25, 2022. *Vinson v. Kinsey* (2023) 93
13 Cal.App.5th 1166, 1173. The trial court indicated that it did not “understand why there was a
14 delay in requesting the restraining order.” *Id.* at 1177. The court then mistakenly interpreted
15 petitioner’s continued contact with the respondent after the primary incident of abuse to mean
16 that she was “not particularly concerned about the threats made by the respond. *Id.*

17 The appellate court reversed the decision, finding that the trial court’s interpretation
18 imposed a “singular vision of how an abused woman should act.” *Id.* at 1176. The appellate court
19 then stated, “[a]ll women exposed to violence and abuse in their intimate relations do not
20 respond similarly, contradicting the mistaken assumption that there exists a singular ‘battered
21 woman profile.’ Like other trauma victims, battered women differ in the type and severity of
22 their psychological reactions to violence and abuse, as well as their strategies for responding to

1 violence and abuse.” *Id.* (citing *In re I.B.* (2020) 53 Cal.App.5th 133, 155, quoting Dutton,
2 *Understanding Women’s Responses to Domestic Violence: A Redefinition of Battered Woman*
3 *Syndrome* (1993) 21 Hofstra L.Rev.1191, 1225.). While the court may consider the timing of a
4 restraining order request as a part of the totality of the circumstances, “[t]he length of time since
5 the most recent act of abuse is not, by itself, determinative.” Cal. Fam. Code Section 6301(c).

6 Here, Mylea has met her burden of proof by a preponderance of the evidence that there
7 has been an act of abuse against her by Carlos through her own declarations, the violations of the
8 TRO and litigation abuse (discussed in more detail below), as well as the testimony that will be
9 provided at the trial. Mylea endured years of physical and sexual abuse during their relationship,
10 as well as threats and control. During their relationship, Carlos would rape and physically force
11 himself on Mylea, despite her clear objections and lack of consent. The presence of guns in the
12 house communicated to Mylea that she was not safe, and Carlos would remind her of this fact.
13 On several occasions, Carlos put his guns in Ileana’s diaper and would laugh. One such instance
14 was when he put a gun in Ileana’s diaper after becoming jealous because Mylea was speaking to
15 someone on the phone. This instilled a baseline sense of fear for herself and Ileana. She was not
16 safe in her own home – a fear which was corroborated by the fact that Carlos installed cameras in
17 the home and would monitor her every move as well as her conversations with others in the
18 home.

19 These traumatic experiences built the foundation for her fear after the parties’
20 relationship ended and were ever present in the years following their separation. Upon their
21 separation, Mylea instantly knew there was no way for her to leave Mexico due to the abuse and
22 fear for her and Ileana’s lives. Carlos ensured that Mylea was watched and followed. He once

1 again reminded Mylea of his complete and utter control over her and the legal system in Mexico
2 when he unilaterally withheld Ileana from Mylea until she was coerced into signing an
3 agreement that was favorable to him. Mylea’s testimony surrounding this event and the immense
4 trauma that both she and Ileana faced are prime evidence of Carlos’ coercive control and
5 willingness to use the parties’ minor child as a weapon and instrument to inflict his abuse and
6 control. This agreement left Mylea homeless, without any transportation, and without any
7 immediate financial support. During their relationship, Carlos ensured that Mylea was
8 completely financially reliant on him and would not allow her to return to work after the birth of
9 Ileana. Instead, he “permitted” her to only work at his family’s restaurant.

10 Carlos’ continued coercion after the parties’ separation clearly communicated to Mylea
11 that she was not free and that he would not abide by the agreement that he coerced her into
12 signing under duress. Moreover, Carlos and his family’s control over law enforcement ensured
13 Carlos’ ability to disregard any agreement or orders. Carlos and his family continually picked up
14 Ileana during Mylea’s designated time, and would threaten Mylea that she would never see
15 Ileana again, leaving her powerless to seek recourse. Carlos continued to threaten Mylea, telling
16 her that he would make her disappear, she could not leave Mexico, and informing her that he was
17 still watching her. Mylea reasonably believed these threats to be true due to Carlos and his
18 family’s control and power over law enforcement and judiciary in the area, and their use of law
19 enforcement to threaten and harass her.

20 Mylea finally found an opportunity to leave Mexico with Ileana after Carlos had just
21 returned from a trip to Disneyland in the United States with Ileana. Believing that Carlos would
22 be more amenable to Mylea taking a trip with Ileana, she informed him that she would be

1 traveling to Puerto Vallarta, as he would not allow her to go outside of Mexico. Carlos agreed to
2 the trip and Mylea immediately fled to California for protection from his violence and control.

3 **1. Carlos’ violation of the Temporary Restraining Order and his litigation abuse**

4 Evidence of post-filing abuse is “plainly relevant,” particularly when the abuse occurred
5 after the issuance of a TRO. *In re Marriage of F.M. & M.M.* (2021) 65 Cal.App.5th 106, 117.
6 Family Code Section 6203(a)(4) specifically provides that engaging in behavior that has been
7 enjoined by a TRO pursuant to section 6320 constitutes abuse for the purposes of the DVPA. It
8 follows, therefore, that violations of the TRO constitute additional acts of abuse, specifically
9 constituting abuse that disturb the peace of the protected party. *N.T. v. H.T.* (2019) 34
10 Cal.App.5th 595, 603. A knowing violation of the restraining order cannot be characterized as de
11 minimis and a technical violation. *Id.* at 603 (citing *Lister v. Bowen* (2013) 215 Cal.App.4th 319,
12 334-335). “Restraining orders are intended to ‘increase a victim’s safety, decrease a victim’s fear
13 of future harm, and improved a victim’s overall sense of well-being and self-esteem.’” (Stats.
14 2014, ch. 635 section 1, subd.(f).). Courts have held that “any violation of a restraining order is
15 very serious, and gives very significant support for renewal of a restraining order.” *Lister*, 215
16 Cal.App.4th at 355. The abuser’s very act of defying a court order can, by itself, exacerbate a
17 victim’s feelings of helplessness and fear. Logan & Walker, *Civil Protective Order Outcomes*
18 (2009) 24 J. Interpersonal Violence 675,684. An abuser’s violation of a DVRO leaves the victim
19 feeling that no remedy will ever be effective in stopping abuse. See *Lister*, 215 Cal.App.4th at
20 333 (“A defendant’s conduct can place a victim in reasonable fear of serious bodily injury
21 without involving any violence.”).

1 In the instant case, Carlos' violation of the Temporary Restraining Order is relevant and
2 prime evidence of his abuse that must be considered by the court. After being served with the
3 Temporary Order and knowing that Mylea's residential address was protected and confidential,
4 he enlisted the assistance of a third party – his counsel – to search for and ascertain her
5 residential address. This violation has no justification whatsoever and was purely to instill fear
6 on Mylea. The searching and ascertainment of her residential address instilled immense fear in
7 Mylea for the safety of her and Ileana. After becoming aware he knew her residential address,
8 she immediately sought refuge with a friend for many days and contacted the police. While she
9 sought refuge, Mylea consistently received notifications on her phone through her Ring app that
10 an unknown person was coming to her door day and night. She further started seeing suspicious
11 individuals sitting in vehicles outside her workplace.

12 After seeing that Carlos was in Mendocino County for the last hearing, Mylea became
13 instantly terrified because her address was no longer confidential, and he was in the area. This
14 caused Mylea's counsel to put the court on notice of this fear and admonish Carlos. Mylea is
15 limited in her resources and had already moved from her aunt's residence in Chico because
16 Carlos and his family knew where Mylea's aunt lived. Since the discovery of her address, despite
17 its confidentiality and the TRO, Mylea has lived in constant fear; constantly looking over her
18 shoulder for Carlos. Mylea has also noticed a black SUV parked outside of her workplace and
19 seemingly tracking her on several occasions, which has instilled even more fear.

20 Carlos' violation of the TRO, coupled with his litigation abuse in the State and Federal
21 Court, is prime evidence of his abusive conduct and control. A fact which the Federal court
22 recognized, on the record. Carlos has completely and utterly disregarded the judicial system and
23

1 is treating the California judicial system with the same expectations as he receives in Mexico
2 where he has complete control. Carlos, by and through his counsel, has demanded that Mylea
3 confront him under the guise of settlement in the federal court, despite a valid restraining order
4 and her fear, and has employed emotional abuse to try and coerce Mylea into circumventing
5 court orders for visitation. All the while, Carlos has employed his counsel, an officer of the court,
6 to aid, acquiesce and abet the continuation of the abuse and disregard for the Temporary
7 Restraining Order. On two separate occasions, Carlos and his counsel have gone behind the back
8 of this court to try and obtain orders more favorable to him, and which he knows would be
9 traumatic for Ileana, including the no notice TRO while settlement was being discussed in state
10 court; and the ex parte request for a stay of this proceeding after this Court had already ruled on
11 this issue. This ex parte request for a stay was recognized by the Federal Court as
12 “gamesmanship at its most transparent”, and indicated Carlos’ litigation tactics were deceptive.
13 The Federal Court further recognized and admonished Carlos for his lack of focus on Ileana’s
14 best interest, and stated that the way this case has been litigated tells him something about the
15 perspective of Carlos, which he found to be appalling.

16 **III. CONCLUSION**

17 Based upon the foregoing, the evidence provided to the court by Mylea and minor’s counsel
18 in their declarations and reports, the violations of the TRO and litigation abuse by Carlos, and
19 additional testimony by Mylea her witnesses, will show by a preponderance of the evidence that
20 there have been numerous acts of abuse in the past; as well as ongoing abuse. This abuse is all
21 encompassing, and still persists despite the protection of the court. Carlos’ abuse has deeply
22 impacted Ileana, causing her immense separation anxiety from Mylea, which Mylea continues to

1 try and address with Ileana. Therefore, Mylea is requesting protection for herself and Ileana from
2 Carlos and his abuse and requesting a five year restraining order.

3
4 Date: 08/15/2024

LAW OFFICES OF B J FADEM & ASSOCIATES, APC

5
6 *Erika Lee*

7 _____
8 ERIKA A. LEE, ESQ.
9 Attorney for Petitioner
10
11
12
13
14
15
16
17
18
19
20
21
22