

No. S271054

**IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA**

DEBRA TURNER,

Petitioner,

v.

LAURIE ANNE VICTORIA, et al.,

Respondents.

After a Decision By the Court of Appeal, Fourth Appellate District,
Division One,
Case Nos. D076318, D076337

San Diego County Superior Court
Trial Case No. 37-2017-00009873-PR-TR-CTL
The Honorable Julia C. Keley, Dept. 503
(Appeal No. D076318)

San Diego County Superior Court
Trial Case No. 37-2018-00038613-CU-MC-CTL
The Honorable Kenneth J. Medel, Dept. C-66
(Appeal No. D076337)

**RESPONDENT THE CONRAD PREBYS FOUNDATION 'S
OPPOSITION TO APPELLANT'S REQUEST FOR JUDICIAL
NOTICE**

*Service on the Attorney General required by Prob. Code §§ 17200, 17203,
Corps. Code §§ 5142, 5223, and 5233 and Rule of Court 8.29(a)*

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THE CONRAD PREBYS FOUNDATION

{00014414}

Respondent The Conrad Prebys Foundation (“The Foundation”) respectfully moves the Court for an order denying Petitioner Debra Turner’s request for judicial notice of the Attorney General’s Objection to Third Account and Report of Trustee and Petition for: (1) Settlement of Account; (2) Ratification of Prior Acts by Trustee; and (3) Order Authorizing Trustee’s Fees, filed in a proceeding currently pending before the San Diego Superior Court involving Respondents Victoria and The Conrad Prebys Foundation.

MEMORANDUM OF POINTS AND AUTHORITIES

The grounds on which The Foundation opposes Petitioner’s request for judicial notice are identical to the grounds asserted in Respondent Laurie Anne Victoria’s Opposition to Appellant’s Request for Judicial Notice. Therefore, in the interest of judicial economy, rather than reasserting those arguments herein, The Foundation joins in those arguments and incorporates the same herein by this reference.

DATED: June 28, 2022

Respectfully Submitted,

BROWNLIE HANSEN LLP

By:  _____
ROBERT W. BROWNLIE

DLA PIPER LLP (US)

By: *S. Andrew Pharies* _____
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Attorneys for Respondent
The Conrad Prebys Foundation

PROOF OF SERVICE

I, Veronica Collins-Perez, declare as follows:

I am employed in the County of San Diego, State of California, I am over the age of eighteen years and am not a party to this action; my business address is 10920 Via Frontera, Suite 550, San Diego, California 92127, in said County and State. On June 28, 2022, I served the following document(s):

**RESPONDENT THE CONRAD PREBYS FOUNDATION 'S
OPPOSITION TO APPELLANT'S REQUEST FOR JUDICIAL
NOTICE**

on the parties stated below, by the following means of service:

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*Court of Appeal Case Nos.
D076318, D076337*

- BY UNITED STATES MAIL:** I caused a true copy to be placed in a sealed envelope or package addressed to the persons as indicated above, on the above-mentioned date, and caused the envelope to be placed for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited with the U.S. Postal Service in the ordinary course of business in a sealed envelope with postage fully prepaid. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing set forth in this declaration. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Diego, California.

San Diego County Superior Court
The Honorable Julia C. Kelety
1100 Union Street, Fifth Floor
Dept. SD-503
San Diego, CA 92101

Trial Court Case No.
37-2017-00009873-PR-TR-CTL

San Diego County Superior Court
The Honorable Kenneth J. Medel
330 W. Broadway, Dept. SD-66
San Diego, CA 92101

Trial Court Case No.
37-2018-00038613-CU-MC-CTL

Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-4797

- (STATE)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 28, 2022.



Veronica Collins-Perez

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **TURNER v.
VICTORIA**

Case Number: **S271054**

Lower Court Case Number: **D076318**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **robert.brownlie@brownliehansen.com**
3. I served by email a copy of the following document(s) indicated below:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

6/28/2022

Date

/s/Robert Brownlie

Signature

Brownlie, Robert (138793)

Last Name, First Name (PNum)

Brownlie Hansen LLP

Law Firm