

No. S271054

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

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**DEBRA TURNER,**

*Petitioner,*

v.

**LAURIE ANNE VICTORIA, et al.,**

*Respondents.*

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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. Kelety, 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)

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**RESPONDENT'S ANSWER TO PETITION FOR REVIEW**

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*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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ROBERT W. BROWNLIE  
(Bar No. 138793)  
*robert.brownlie@brownliehansen.com*  
**BROWNLIE HANSEN LLP**  
10920 Via Frontera, Suite 550  
San Diego, CA 92127  
Telephone: 858-357-8001

S. ANDREW PHARIES  
(Bar No. 160492)  
*andrew.pharies@dlapiper.com*  
**DLA PIPER LLP (US)**  
4365 Executive Drive, Ste 1100  
San Diego, CA 92121  
Telephone: 858-677-1400  
Fax: 858-677-1401

*Attorneys for Respondent*

**THE CONRAD PREBYS FOUNDATION**

The Conrad Prebys Foundation (the “Foundation”), the nonprofit corporation on whose behalf Petitioner has sought to assert claims, urges the Supreme Court to deny the Petition for Review on the grounds that review of the decision by the Court of Appeal for the Fourth Appellate District – Division One is not necessary to “secure uniformity of decision” or “settle an important question of law.” (Cal. Rules of Court, rule 8.500(b)(1).) Rather than burdening the Court with an Answer that essentially repeats the arguments set forth in the Answers filed on behalf of Respondent Joseph Gronotte and Respondent Laurie Anne Victoria, respectively, the Foundation hereby joins in and incorporates by reference the arguments set forth in those Answers, which demonstrate that the Petition fails to establish that review by the Supreme Court of the decision by the court below is necessary or warranted.

DATED: October 14, 2021

Respectfully Submitted,

**BROWNLIE HANSEN LLP**

By:   
\_\_\_\_\_  
ROBERT W. BROWNLIE

**DLA PIPER LLP (US)**

By:   
\_\_\_\_\_  
S. ANDREW PHARIES

Attorneys for Respondent  
The Conrad Prebys Foundation

**CERTIFICATION OF WORD COUNT**

Pursuant Rule 8.204(c)(1), California Rules of Court, the undersigned hereby certifies that this RESPONDENT’S ANSWER TO PETITION FOR REVIEW contains 141 words, excluding the tables and this certificate, according to the word count generated by the computer program used to produce this document.

Dated: October 14, 2021

**BROWNLIE HANSEN LLP**

By:   
\_\_\_\_\_

ROBERT W. BROWNLIE

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 October 14, 2021, I served the following document(s):

**RESPONDENT’S ANSWER TO PETITION FOR REVIEW**

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Steven M. Strauss  
Erin C. Trendera  
Cooley LLP  
4401 Eastgate Mall  
San Diego, CA 92121  
sms@cooley.com  
etrendera@cooley.com

*Attorneys for Debra Turner*

Kristen E. Caverly  
Lisa B. Roper  
Henderson, Caverly, Pum & Trytten LLP  
12750 High Bluff Drive, Suite 300  
San Diego, CA 92130  
kcaverly@hcesq.com  
lroper@hcesq.com

*Attorneys for Joseph Gronotte*

J. Christopher Jaczko  
Procopio, Cory, Hargreaves & Savitch  
LLP  
12544 High Bluff Drive, Suite 400  
San Diego, CA 92130  
chris.jaczko@procopio.com

*Attorneys for Gregory Rogers*

Sean M. Sullivan  
Procopio, Cory, Hargreaves & Savitch  
LLP  
525 B Street, Suite 2200  
San Diego, CA 92101  
sean.sullivan@procopio.com

*Attorneys for Gregory Rogers*

Reginald Vitek  
Scott W. Perlin  
Seltzer Caplan McMahon Vitek  
750 B Street, Suite 2100  
San Diego, CA 92101-8177  
vitek@scmv.com  
perlin@scmv.com

*Attorneys for Anthony Cortes*

Scott A. Edelman  
Alexander K. Mircheff  
Megan Cooney  
Jillian N. London  
Gibson, Dunn & Crutcher LLP  
2029 Century Park East, Suite 4000  
Los Angeles, CA 90067-3026  
sedelman@gibsondunn.com  
amircheff@gibsondunn.com  
mcooney@gibsondunn.com  
jlondon@gibsondunn.com

*Attorneys for Laurie Anne  
Victoria*

Carolyn Hughes  
Sandra Barrientos  
Deputy Attorney General  
Charitable Trusts Section  
California Dept. of Justice  
Office of the Attorney General  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Carolyn.Hughes@doj.ca.gov  
Sandra.Barrientos@doj.ca.gov  
SacAWTTrueFiling@doj.ca.gov

*Attorneys for Attorney General,  
State of California Charitable  
Trusts*

Clerk  
Court of Appeal  
Fourth Appellate District, Div. One  
750 B Street, Suite 300  
San Diego, CA 92101  
eservice@capcentral.org

*Court of Appeal Case Nos.  
D076318, D076337*

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San Diego County Superior Court  
The Honorable Julia C. Keley  
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*

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

Executed on October 14, 2021.



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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**

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| Scott Edelman<br>Gibson Dunn & Crutcher LLP<br>116927            | sedelman@gibsondunn.com            | e-Serve | 10/14/2021<br>12:07:34 PM |
| Jillian London<br>Gibson Dunn & Crutcher LLP<br>319924           | jlondon@gibsondunn.com             | e-Serve | 10/14/2021<br>12:07:34 PM |
| Kristen Caverly<br>Henderson Caverly Pum & Trytten LLP<br>175070 | kcaverly@hcesq.com                 | e-Serve | 10/14/2021<br>12:07:34 PM |
| Stephen Pharies<br>DLA Piper LLP (US)                            | andrew.pharies@dlapiper.com        | e-Serve | 10/14/2021<br>12:07:34 PM |
| Richard Heller   | richard.heller@procopio.com        | e-      | 10/14/2021                |

|  |                              |         |                           |
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| Procopio, Cory, Hargreaves & Savitch               |                              | Serve   | 12:07:34 PM               |
| Sandra Barrientos<br>ATTORNEY GENERAL OF<br>163808 | sandra.barrientos@doj.ca.gov | e-Serve | 10/14/2021<br>12:07:34 PM |

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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.

10/14/2021

Date

/s/Robert Brownlie

Signature

Brownlie, Robert (138793)

Last Name, First Name (PNum)

Brownlie Hansen LLP

Law Firm