
Subject: Fwd: MOTIONS/SUBPEONAS/DOCS/FL320/FL311

From: Nuha Sayegh <chefnuha@gmail.com>

To: Eric Jones <eric@recovery-compass.org>

Date Sent: Sunday, November 2, 2025 1:39:34 AM GMT-07:00

Date Received: Sunday, November 2, 2025 1:39:59 AM GMT-07:00

Attachments: SUBPOENA_AttachmentA_Keck_Medicine.docx, Proposed_Protective_Order_with_Checkboxes.docx, Proposed_Order_Party_Production_Forensic_Protocol.docx, SUBPOENA_LA BEAUTY.pdf, SUBPEONA DR. KOGIAN.pdf, SUBPEONA USC Norris Cancer Hospital.pdf, HIPAA AUTHORIZATION TO RELEASE MEDICAL INFORMATION.docx, fl311.pdf, FL320.pdf, HOLIDAY SCHEDULE.docx

SUBPOENA DUCES TECUM — ATTACHMENT A (Keck Medicine of USC)

(To accompany Judicial Council SUBP-010 / SUBP-025)

Production Date/Time: _____ at _____ (or as otherwise ordered). Place of Production: [Designated production portal or counsel address].

Entity: Keck Medicine of USC — [Insert appropriate Keck Health Records Department address]

Records to Be Produced (narrowly tailored)

1. Problem list and differential/diagnoses related to respiratory carcinoma within the authorized timeframe.
2. Imaging orders/reports (CT, MRI, PET) and any pathology/cytology reports within the authorized timeframe.
3. Provider notes discussing cancer diagnosis, staging, or treatment planning within the authorized timeframe.

Date Range

Date window: limited to the timeframe of Petitioner's claimed respiratory-carcinoma diagnosis (specify as known).

Confidentiality & Protective Order

This subpoena issues pursuant to CCP § 1985.3 (consumer notice served). Production is subject to the Court's HIPAA Qualified Protective Order (45 C.F.R. § 164.512(e)) and Protective Order on file. Redact non-responsive private information.

Mode of Production

Produce as legible PDFs and native image files (if any). Include custodian declaration (Evid. Code § 1561).

[PROPOSED] PROTECTIVE ORDER (HIPAA QUALIFIED PROTECTIVE ORDER; AEO FOR CHILD INTERVIEW)

The Court, having considered the parties' papers and good cause appearing, issues the following Protective Order. Each provision below may be granted, denied, or modified as indicated.

1. PURPOSE. This Order permits production of narrowly tailored confidential information for use only in this action and protects against unnecessary disclosure.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

2. SCOPE. "Protected Material" includes: (a) medical "personal records" (CCP § 1985.3) produced by Keck Medicine, Medical Weight Loss & Beauty/Dr. James Kojian, and LA Beauty Skin Center/Dr. Arman F. Karapetyan; (b) any WIC § 827 materials disclosed by Court order; and (c) native text exports/forensic extracts limited to the June 1–15, 2025 Nuha↔Mia thread.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

3. HIPAA QUALIFIED PROTECTIVE ORDER. Under 45 C.F.R. § 164.512(e), parties may use Protected Health Information solely for this litigation; they shall return or destroy it (including all copies) within 60 days after final disposition; and they shall safeguard it from disclosure to any person except as allowed by this Order or further Court order.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

4. ATTORNEYS' EYES ONLY (AEO). Any child-welfare interview materials disclosed under WIC § 827 shall be designated AEO and may be viewed only by counsel, experts, and the Court; no dissemination to parties or third persons absent further order.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

5. FILING UNDER SEAL. Any filing that quotes or attaches Protected Material shall be accompanied by a motion or application to seal per CRC 2.550–2.551.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

6. REDACTIONS. Producing entities may redact Social Security numbers and non-responsive medical information not related to the limited categories authorized by the Court.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

7. CHALLENGES. Any confidentiality designation may be challenged for good cause; the producing party bears the burden of showing protection remains warranted.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

ADDITIONAL DISCOVERY AUTHORIZATIONS (if presented with this Protective Order)

• WIC § 827 IN-CAMERA: Custodian to lodge ONLY the Oct. 16, 2025 school interview of the minor (Tyler Polk, DCFS) and minimal intake/conclusion tied to Aug. 26, 2025 allegation; limited disclosure per Order.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

Return/Production by: _____

• SUBPOENA — DR. KOJIAN: Medical Weight Loss & Beauty / James Kojian, M.D.; procedure notes/consents/photos/diagnosis/billing for Nov. 3–4, 2023 (±7 days).

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

Return/Production by: _____

• SUBPOENA — LA BEAUTY SKIN CENTER: Arman F. Karapetyan, M.D.; same limited categories and date window as above.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

Return/Production by: _____

• SUBPOENA — KECK MEDICINE: Problem list; diagnostics; imaging/pathology; provider notes limited to the timeframe of the claimed ‘respiratory carcinoma.’

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

Return/Production by: _____

• PARTY PRODUCTION — NUHA↔MIA TEXTS: Native iMessage thread, June 1–15, 2025, plus PDFs; limited forensic protocol only if authenticity is disputed.

☐ GRANTED ☐ DENIED ☐ MODIFIED: _____

Return/Production by: _____

IT IS SO ORDERED.

Date: _____

JUDGE OF THE SUPERIOR COURT

[PROPOSED] ORDER RE PARTY PRODUCTION AND LIMITED FORENSIC PROTOCOL (NUHA↔MIA THREAD, JUNE 1–15, 2025)

1. Petitioner shall produce, within 10 days, a native export (and PDF printouts) of the Nuha↔Mia iMessage thread limited to June 1–15, 2025. Production may be made via secure file transfer to Respondent or lodged with the Court if required by the Protective Order.
2. If authenticity is disputed, the Court appoints a neutral forensic examiner to collect ONLY the identified chat and ONLY for the June 1–15, 2025 date range, generate a hash-verified extract, and provide chain-of-custody documentation. No other data may be accessed or disclosed.
3. All materials are subject to the Protective Order. Any filing quoting the thread shall be submitted under seal per CRC 2.550–2.551.

SUBPOENA DUCES TECUM — ATTACHMENT A (LA Beauty Skin Center / Arman F. Karapetyan, M.D.)

(To accompany Judicial Council SUBP-010 / SUBP-025)

Production Date/Time: _____ at _____ (or as otherwise ordered). Place of Production: [Designated production portal or counsel address].

Entity: LA Beauty Skin Center / Arman F. Karapetyan, M.D. — [Insert clinic address(es) for LA Beauty Skin Center]

Records to Be Produced (narrowly tailored)

1. Appointment logs/scheduling entries for Petitioner within the authorized window.
2. Procedure/clinical notes for cosmetic injections (face/lips) including pre-/post-procedure observations.
3. Informed consent forms and treatment plans for injections/fillers.
4. Clinical photographs taken in connection with the above procedures.
5. Billing statements and CPT/HCPCS codes for the above services.

Date Range

Date window: Nov. 3–4, 2023 (and ± 7 days if necessary to capture the encounter).

Confidentiality & Protective Order

This subpoena issues pursuant to CCP § 1985.3 (consumer notice served). Production is subject to the Court’s HIPAA Qualified Protective Order (45 C.F.R. § 164.512(e)) and Protective Order on file. Redact non-responsive private information.

Mode of Production

Produce as legible PDFs and native image files (if any). Include custodian declaration (Evid. Code § 1561).

**SUBPOENA DUCES TECUM — ATTACHMENT A (Medical Weight
Loss & Beauty / James Kojian, M.D.)**

(To accompany Judicial Council SUBP-010 / SUBP-025)

Production Date/Time: _____ at _____ (or as otherwise ordered). Place of
Production: [Designated production portal or counsel address].

Entity: Medical Weight Loss & Beauty / James Kojian, M.D. — 24 E. Colorado Blvd.,
Pasadena, CA 91105; (626) 777-7900

Records to Be Produced (narrowly tailored)

1. Appointment logs/scheduling entries for Petitioner within the authorized window.
2. Procedure/clinical notes for cosmetic injections (face/lips) including pre-/post-procedure observations.
3. Informed consent forms and treatment plans for injections/fillers.
4. Clinical photographs taken in connection with the above procedures.
5. Billing statements and CPT/HCPCS codes for the above services.

Date Range

Date window: Nov. 3–4, 2023 (and ± 7 days if necessary to capture the encounter).

Confidentiality & Protective Order

This subpoena issues pursuant to CCP § 1985.3 (consumer notice served). Production is subject to the Court's HIPAA Qualified Protective Order (45 C.F.R. § 164.512(e)) and Protective Order on file. Redact non-responsive private information.

Mode of Production

Produce as legible PDFs and native image files (if any). Include custodian declaration (Evid. Code § 1561).

**[PROPOSED] ORDER FOR IN-CAMERA REVIEW AND LIMITED
DISCLOSURE (WIC § 827; CRC 5.552)**

Having considered Respondent's Request, the Court finds good cause to review juvenile/child-welfare materials in camera pursuant to WIC § 827 and CRC 5.552.

IT IS ORDERED: (1) The custodian shall lodge with the Court, within 10 days, ONLY the October 16, 2025 school interview of the minor conducted by DCFS social worker Tyler Polk, and any minimal intake/conclusion directly tied to the August 26, 2025 allegation. (2) The Court will conduct an in-camera review. (3) The Court may release a limited extract or summary for use in this case only, subject to the Protective Order. (4) Further dissemination is prohibited absent Court order.

REQUEST FOR ORDERS AUTHORIZING LIMITED DISCOVERY AND PROTECTIVE ORDER; REQUEST FOR IN-CAMERA REVIEW (WIC § 827)

(Welf. & Inst. Code § 827; CCP §§ 1985.3, 2017.010; Fam. Code § 217; 45 C.F.R. § 164.512(e); CRC 5.552, 2.550–2.551; Hill v. NCAA; Britt v. Superior Court)

Hearing Date/Time: To be set by the Clerk Department: [] Location: [Courthouse Address]

NOTICE OF REQUEST FOR ORDERS

PLEASE TAKE NOTICE that Respondent moves for orders: (1) authorizing narrowly tailored discovery essential to the issues raised by Respondent’s Motion for New Trial; (2) issuing a protective order governing use and confidentiality; and (3) directing in-camera review under WIC § 827 of specific child-welfare materials. This Request is based on the attached Memorandum, Declaration, Exhibits, and Proposed Orders.

I. PROCEDURAL HISTORY

- October 15, 2025: Domestic Violence Restraining Order (DVRO) heard and entered.
- [Date]: Notice of entry served.
- [Date]: Respondent filed a Notice of Intent to Move for New Trial (CCP §§ 657, 659).
- [Date]: Respondent prepared a Motion for New Trial asserting newly discovered evidence (CCP § 657(4)), irregularity/abuse of discretion and errors of law (including denial of live testimony under Fam. Code § 217), and insufficiency/against law.
- Now: Respondent seeks limited discovery with protections so material evidence (not reasonably obtainable before the DVRO hearing) can be gathered and presented within the CCP § 660 jurisdictional period.

II. FACTUAL BACKGROUND (Necessity & Narrow Tailoring)

A. DCFS school interview (Aug. 26, 2025 incident) — occurred Oct. 16; first learned Oct. 19. On October 16, 2025, DCFS social worker Tyler Polk interviewed the minor at Eliot Middle School. The minor reportedly denied witnessing an assault or injuries, denied being at Respondent’s Sonoma residence on Aug. 26, and reported Petitioner told

her what to say to DCFS. These statements—first learned Oct. 19—are material, noncumulative, and outcome-determinative; they go to credibility and alleged coaching and could not, with reasonable diligence, have been presented on Oct. 15.

Sought order: WIC § 827 in-camera review of the single school interview (and minimal intake/conclusion tied to that allegation), with limited disclosure under protective order. Evidentiary path: party admissions (Evid. Code § 1220), prior inconsistent statements (§ 1235), credibility (§ 780), business/official records (§ 1280), foundation (§§ 1400–1402).

B. June 8, 2025 messages (discovered Oct. 19 on minor’s phone) — cause of condition; children’s whereabouts. A same-day thread shows Mother reporting hand/eye problems and includes a photo of her hand—no mention of assault. Sub-threads show the children were not with Petitioner that night (e.g., “Dad has him” re the cat; 11:49 p.m. “good night” exchange). The June 9 morning thread reflects routine logistics, also with no report of abuse.

Sought order: Party production of the Nuha↔Mia native iMessage thread limited to June 1–15, 2025, plus PDFs/screenshots; if authenticity is challenged, a limited forensic protocol (neutral examiner; one chat; two-week range). Evidentiary path: party admissions (Evid. Code § 1220), credibility (§ 780), authentication of ESI/photos (Evid. Code §§ 1400–1402; *People v. Goldsmith*, 59 Cal.4th 258; *People v. Valdez*, 201 Cal.App.4th 1429).

C. November 4, 2023 image — identification of cosmetic-injection provider (discovered Oct. 22, 2025). On Oct. 22, 2025, Respondent received a July 19, 2024 family-group thread where Petitioner discussed “Botox and fillers” at a provider in Old Town Pasadena, attaching the provider’s card and price sheet: “Medical Weight Loss and Beauty — Dr. James Kojian, M.D., 24 E. Colorado Blvd., Pasadena, CA 91105, (626) 777-7900.” Along with references to LA Beauty Skin Center/Dr. Arman F. Karapetyan, Respondent can now target subpoenas for appointment logs, consents, procedure notes, photos, and invoices surrounding Nov. 3–4, 2023 (the “lip” image timeframe).

Sought order: Authorization for CCP § 1985.3 subpoenas (with HIPAA Qualified Protective Order) to Dr. Kojian/Medical Weight Loss & Beauty and LA Beauty Skin Center/Dr. Karapetyan, date-limited to the procedure window. Relevance: causation of alleged injuries (medical/cosmetic vs. assault).

D. Keck Medicine records regarding claimed “respiratory carcinoma.” Respondent seeks narrowly limited Keck Medicine records (problem list, diagnostics, imaging/pathology, and pertinent notes) for the specific timeframe of the claim; accuracy bears on credibility.

Sought order: Authorization for CCP § 1985.3 subpoena to Keck Medicine with HIPAA QPO, time-window limited; allow redaction of unrelated information.

III. RELIEF REQUESTED

1) WIC § 827 In-Camera Review: Lodge only the Oct. 16, 2025 school interview (and minimal intake/conclusion tied to the Aug. 26 allegation) in camera; authorize limited disclosure for use in this case only.

2) Medical “Personal Records” (CCP § 1985.3) + HIPAA QPO:

- Dr. James Kojian / Medical Weight Loss & Beauty (24 E. Colorado Blvd., Pasadena) — produce procedure notes, consents, photos, diagnosis, billing/CPT for a narrow window around Nov. 3–4, 2023.

- LA Beauty Skin Center / Dr. Arman F. Karapetyan — same categories for the same narrow window.

- Keck Medicine — problem list; diagnostics; imaging/pathology; provider notes within the claimed “respiratory carcinoma” timeframe.

3) June 8 Texts (Party Production / Limited Forensic Protocol): Order Petitioner to produce the native Nuha↔Mia thread for June 1–15, 2025 with PDFs; authorize neutral forensic examiner only if authenticity is disputed (one chat; two-week range).

4) Protective Order (Global): Litigation-only use; no dissemination; AEO for child-interview content; permission to file under seal any quoted pages; mandatory redaction of unrelated medical information.

5) Schedule: Set production/lodging deadlines allowing Respondent to file a supplemental declaration (or lodge under seal/in camera) before CCP § 660 expires.

IV. LEGAL STANDARD

Discovery scope: CCP § 2017.010 (relevance & proportionality). Medical personal records: CCP § 1985.3; HIPAA litigation exception: 45 C.F.R. § 164.512(e) (qualified protective order). Juvenile/child-welfare records: WIC § 827; CRC 5.552 (petition & in-camera). Live testimony/fair hearing: Fam. Code § 217; *Elkins v. Superior Court*, 41 Cal.4th 1337. Privacy balancing: *Hill v. NCAA*, 7 Cal.4th 1; *Britt v. Superior Court*, 20 Cal.3d 844. Sealing: CRC 2.550–2.551.

V. ARGUMENT (Summary)

- A. High materiality; narrow tailoring; robust protections.
- B. Essential to CCP § 657 grounds and § 217 hearing.
- C. No adequate alternatives.
- D. Time-sensitive within § 660.

**[PROPOSED] PROTECTIVE ORDER (HIPAA QUALIFIED
PROTECTIVE ORDER; ATTORNEYS' EYES ONLY FOR CHILD
INTERVIEW)**

1. PURPOSE. This Order permits production of narrowly tailored confidential information for use only in this action and protects against unnecessary disclosure.
2. SCOPE. "Protected Material" includes: (a) medical "personal records" (CCP § 1985.3) produced by Keck Medicine, Medical Weight Loss & Beauty/Dr. James Kojian, and LA Beauty Skin Center/Dr. Arman F. Karapetyan; (b) any WIC § 827 materials disclosed by Court order; and (c) native text exports/forensic extracts limited to the June 1–15, 2025 Nuha↔Mia thread.
3. HIPAA QUALIFIED PROTECTIVE ORDER (45 C.F.R. § 164.512(e)). Parties may use Protected Health Information solely for this litigation; they shall return or destroy it (including all copies) within 60 days after final disposition; and they shall safeguard it from disclosure to any person except as allowed by this Order or further Court order.
4. ATTORNEYS' EYES ONLY (AEO). Any child-welfare interview materials disclosed under WIC § 827 shall be designated AEO and may be viewed only by counsel, experts, and the Court; no dissemination to parties or third persons absent further order.
5. FILING UNDER SEAL. Any filing that quotes or attaches Protected Material shall be accompanied by a motion or application to seal per CRC 2.550–2.551.
6. REDACTIONS. Producing entities may redact Social Security numbers and non-responsive medical information not related to the limited categories authorized by the Court.
7. CHALLENGES. Any confidentiality designation may be challenged for good cause; the producing party bears the burden of showing protection remains warranted.

IT IS SO ORDERED.

**DECLARATION OF RESPONDENT IN SUPPORT OF REQUEST
FOR LIMITED DISCOVERY, PROTECTIVE ORDER, AND WIC §
827 IN-CAMERA REVIEW**

I, Fahed “Freddy” Sayegh, declare:

1. I am the Respondent. I have personal knowledge of the facts stated and could testify to them if called.

2. Procedural posture. The Court entered DVRO orders on October 15, 2025. I filed a Notice of Intent to Move for New Trial. I bring this Request to obtain narrowly tailored discovery with appropriate protections so the Court can consider material evidence that could not, with reasonable diligence, have been obtained before the DVRO hearing.

3. DCFS school interview (Oct. 16; first learned Oct. 19). On Oct. 16, 2025, DCFS social worker Tyler Polk interviewed my minor child at Eliot Middle School. I first learned of the interview and its content on Oct. 19. I am informed and believe the child denied witnessing an assault or injuries, denied being at my Sonoma residence on Aug. 26, and reported Petitioner told her what to say to DCFS.

4. June 8, 2025 messages discovered Oct. 19. On Oct. 19, 2025, I recovered from the minor’s iPhone a June 8 thread where Petitioner reported hand/eye problems, with a same-day photo of her hand, and no mention of assault; sub-threads indicate the children were not with Petitioner that night. The June 9 morning thread reflects routine logistics, also with no report of abuse.

5. Cosmetic-injection provider identification (discovered Oct. 22). On Oct. 22, 2025, I received a July 19, 2024 family-group thread identifying “Medical Weight Loss and Beauty — Dr. James Kojian, M.D., 24 E. Colorado Blvd., Pasadena” as a Botox/filler provider Petitioner used; I also have references to LA Beauty Skin Center/Dr. Arman F. Karapetyan. These identifications now allow for narrowly targeted subpoenas for Nov. 3–4, 2023 (timing of the “lip” image).

6. Keck Medicine records. Petitioner referenced a serious “respiratory carcinoma” diagnosis. I seek limited Keck records (problem list, diagnostics, imaging/pathology, notes) for the timeframe of that claim; accuracy bears on credibility.

7. Diligence. Prior to the DVRO hearing, I did not have access to these records or identifications despite reasonable efforts. The items described above were discovered after the hearing on the dates stated.

8. Privacy protections. I request that all records be produced under a Qualified Protective Order (litigation-only use; no dissemination; destruction/return at the end), with AEO

protection for the child interview, redaction of unrelated medical information, and permission to file under seal specific pages if necessary.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on _____, 2025, at Altadena, California.

Fahed “Freddy” Sayegh

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer):	
On (date):	At (time):
Location (address):	
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
 3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):*

☐ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

(Proof of service on reverse)

Page 1 of 2

DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER:
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.
Amount: \$ _____

(2) ☐ Copying fees were paid.
Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. ☐ Not a registered California process server.
b. ☐ California sheriff or marshal.
c. ☐ Registered California process server.
d. ☐ Employee or independent contractor of a registered California process server.
e. ☐ Exempt from registration under Business and Professions Code section 22350(b).
f. ☐ Registered professional photocopier.
g. ☐ Exempt from registration under Business and Professions Code section 22451.
h. Name, address, telephone number, and, if applicable, county of registration and number:

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

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

Date:



(SIGNATURE)



(SIGNATURE)

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
 3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):*

☐ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

(Proof of service on reverse)

Page 1 of 2

DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER:
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
b. Address where served:

- c. Date of delivery:
d. Time of delivery:

- e. (1) ☐ Witness fees were paid.
Amount: \$ _____
(2) ☐ Copying fees were paid.
Amount: \$ _____
f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. ☐ Not a registered California process server.
b. ☐ California sheriff or marshal.
c. ☐ Registered California process server.
d. ☐ Employee or independent contractor of a registered California process server.
e. ☐ Exempt from registration under Business and Professions Code section 22350(b).
f. ☐ Registered professional photocopier.
g. ☐ Exempt from registration under Business and Professions Code section 22451.
h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
 3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):*

☐ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

(Proof of service on reverse)

Page 1 of 2

DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER:
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.
Amount: \$ _____

(2) ☐ Copying fees were paid.
Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. ☐ Not a registered California process server.
b. ☐ California sheriff or marshal.
c. ☐ Registered California process server.
d. ☐ Employee or independent contractor of a registered California process server.
e. ☐ Exempt from registration under Business and Professions Code section 22350(b).
f. ☐ Registered professional photocopier.
g. ☐ Exempt from registration under Business and Professions Code section 22451.
h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

HIPAA AUTHORIZATION TO RELEASE MEDICAL INFORMATION — FORM #1 (KECK)

Patient/Member: Nuha Sayegh

Date of Birth: 04 / 03 / 1985

Phone: 310-384-8404

Email: nuhasayegh.ca@gmail.com

Address: 1226 Sonoma Drive, Altadena, CA 91001

Recipients (who may receive the information):

- **Fahed “Freddy” Sayegh** – Relationship: Spouse – Phone: 310-877-5033 – Email: freddy@thefoxxfirm.com – Address: 1226 Sonoma Drive, Altadena, CA 91001
- **Attorney for Fahed “Freddy” Sayegh:** Name: **Gilbert Quioness Esq.** | Phone: (626) 937-6320 | Email: gqlaw2004@yahoo.com | Address: 206 S. Stimson Ave, La Puente, CA 91744

Purpose of disclosure (check all that apply):

☐ Continuity of care ☒ Legal matter ☐ Personal records ☐ Insurance/claims ☐ Other: **Cancer diagnosis clarification and comprehensive medical summary**

Records to be disclosed (check all that apply):

Report and diagnosis and prognosis of cancer

Specific request: All records related to **cancer evaluation/diagnosis/prognosis**, including pathology, oncology notes, tumor board summaries, staging documentation, treatment plans, and any records addressing “respiratory carcinoma” or prognosis statements.

Date range for records: ☐ All dates of service (recommended) or From March 2024 - current

Format & delivery:

☒ Secure email ☐ Portal upload ☐ Paper copies by mail ☐ Fax ☐ Encrypted CD/USB

Preferred delivery: Mail to **Fahed “Freddy” Sayegh**, 1226 Sonoma Drive, Altadena, CA 91001; and/or coordinate by phone **310-877-5033**. Provide duplicate copy to **Attorney Gilbert Quioness** at the address above.

Authorization & acknowledgments: I understand this authorization is voluntary; I may revoke it in writing at any time (except to the extent action has already been taken). Redisclosure may not be protected by HIPAA. Treatment, payment, enrollment, or eligibility for benefits will not be conditioned on my signing this form. I have a right to a copy of this authorization.

Expiration: ____ / ____ / ____ or ☐ One year from signature.

Signature of Patient/Representative: _____

Print name & relationship (if not patient): _____

Date: ____ / ____ / ____

ID verified by (office use): Type _____ # _____ Staff Initials _____

Provider to release records:

Keck Medicine of USC — Health Information Management

Preferred submission method: Submit via Keck's online **"Authorization to Release Protected Health Information"** form.

Questions: HIMROI@med.usc.edu

(If mailing/faxing is needed, Keck HIM can advise current address/fax upon inquiry.)

HIPAA AUTHORIZATION TO RELEASE MEDICAL INFORMATION — FORM #2 (DR. KOJIAN)

Patient/Member: Nuha Sayegh

Date of Birth: 04 / 03 / 1985

Phone: 310-384-8404

Email: nuhasayegh.ca@gmail.com

Address: 1226 Sonoma Drive, Altadena, CA 91001

Recipients (who may receive the information):

- **Fahed “Freddy” Sayegh** – Relationship: Spouse – Phone: 310-877-5033 – Email: freddy@thefoxxfirm.com – Address: 1226 Sonoma Drive, Altadena, CA 91001
- **Attorney for Fahed “Freddy” Sayegh:** Name: **Gilbert Quioness** Esq. Phone: (626) 937-6320 | Email: gqlaw2004@yahoo.com | Address: 206 S. Stimson Ave, La Puente, CA 91744

Purpose of disclosure (check all that apply):

☐ Continuity of care ☒ Legal matter ☐ Personal records ☐ Insurance/claims ☐ Other:

Verification of cosmetic procedures and materials used

Records to be disclosed (check all that apply):

Specific request: All records of lip filler injections and cosmetic transformations (e.g., dermal fillers, neuromodulators/Botox, threads, lasers), including **dates, injection sites, product names/brands, lot numbers, quantities, adverse event notes, after-care instructions, photographs, and signed consents.**

Date range for records: ☐ All dates of service (recommended) or any and all records

Format & delivery:

☒ Secure email ☐ Portal upload ☐ Paper copies by mail ☐ Fax ☐ Encrypted CD/USB

Preferred delivery: Mail to **Fahed “Freddy” Sayegh**, 1226 Sonoma Drive, Altadena, CA 91001; coordinate by phone **310-877-5033**. Provide duplicate copy to **Attorney Gilbert Quioness** at the address above.

Authorization & acknowledgments: (same as Form #1)

Expiration: ____ / ____ / ____ or ☐ One year from signature.

Signature of Patient/Representative: _____

Print name & relationship (if not patient): _____

Date: ____ / ____ / ____

ID verified by (office use): Type _____ # _____ Staff Initials _____

Provider to release records (THIS FORM #2):

Dr. James Kojian, M.D. — Medical Weight Loss & Beauty

Address: 24 E Colorado Blvd, Pasadena, CA 91105

Phone: _____ (if available)

Note to provider: Please include any associated clinic/DBA records under the practice.

HIPAA AUTHORIZATION TO RELEASE MEDICAL INFORMATION — FORM #3 (LA BEAUTY & SKIN CENTER)

Patient/Member: Nuha Sayegh

Date of Birth: 04 / 03 / 1985

Phone: 310-384-8404

Email: nuhasayegh.ca@gmail.com

Address: 1226 Sonoma Drive, Altadena, CA 91001

Recipients (who may receive the information):

- **Fahed “Freddy” Sayegh** – Relationship: Spouse – Phone: 310-877-5033 – Email: freddy@thefoxxfirm.com – Address: 1226 Sonoma Drive, Altadena, CA 91001
- **Attorney for Fahed “Freddy” Sayegh:** Name: **Gilbert Quioness** | Phone: (626) 937-6320 | Email: gqlaw2004@yahoo.com | Address: 206 S. Stimson Ave, La Puente, CA 91744

Purpose of disclosure (check all that apply):

☐ Continuity of care ☒ Legal matter ☐ Personal records ☐ Insurance/claims ☐ Other:

Verification of cosmetic procedures and products used

Records to be disclosed (check all that apply):

- ☒ Complete chart ☐ Consultation notes ☐ Procedure notes ☐ Informed consents
☐ Treatment plans ☐ Product lot/brand details ☐ Pre-/post-procedure photos
☐ Billing/receipts (for date verification)

Specific request: All records of **lip filler injections and any cosmetic alterations**, including neuromodulators (e.g., **Botox**), dates of service, injection maps/sites, product names/brands, lot numbers, quantities, after-care instructions, and pre/post photos.

Date range for records: ☐ **All dates of service (recommended)** or From all treatments

Format & delivery:

☒ Secure email ☐ Portal upload ☐ Paper copies by mail ☐ Fax ☐ Encrypted CD/USB

Preferred delivery to recipients:

- **Mail:** Fahed “Freddy” Sayegh, 1226 Sonoma Drive, Altadena, CA 91001
- **Phone for coordination:** 310-877-5033
- **Attorney:** Gilbert Quioness (contact above)

Authorization & acknowledgments: (same as Form #1)

Expiration: ____ / ____ / ____ or ☐ **One year from signature.**

Signature of Patient/Representative: _____

Print name & relationship (if not patient): _____

Date: ____ / ____ / ____

ID verified by (office use): Type _____ # _____ Staff Initials _____

Provider to release records (THIS FORM #3):

LA BEAUTY & SKIN CENTER

Address: 214 S Lake Ave, Pasadena, CA 91101

Phone: (818) 888-0001

Products/Services: labeautyskincenter.com

Hours: Open · Closes 6 PM | **Areas served:** Los Angeles & nearby

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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CHILD CUSTODY AND VISITATION (PARENTING TIME) APPLICATION ATTACHMENT

—This is not a court order—

TO ☐ Petition ☐ Response ☐ Request for Order ☐ Responsive Declaration to Request for Order
☐ Other (specify):

1. a. ☐ **Custody.** Custody of the minor children of the parties is requested as follows: ☐ [Attachment 1a.](#)

<u>Child's Name</u>	<u>Date of Birth</u>	<u>Legal Custody to</u> <i>(person who decides about the child's health, education, and welfare)</i>	<u>Physical Custody to</u> <i>(person the child regularly lives with)</i>
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b. ☐ **Custody with allegations of a history of abuse or substance abuse**

- (1) ☐ Petitioner ☐ Respondent ☐ Other parent/party is (or are) alleged to have a history of abuse against any of the following persons: a child, the other parent, their current spouse, or the person they live with or are dating or engaged to.
- (2) ☐ Petitioner ☐ Respondent ☐ Other parent/party is (or are) alleged to have the habitual or continual illegal use of controlled substances, or the habitual or continual abuse of alcohol, or the habitual or continual abuse of prescribed controlled substances.
- (3) ☐ I ask that the court NOT order sole or joint custody of the minor child to the person(s) alleged to have a history of abuse or substance abuse.
- (4) ☐ Even though there are allegations, I ask that the court make the child custody orders in item 1a.
(Write the reasons why you think it would be good for the children that the person(s) be granted custody, even though there are allegations against them of a history of abuse or substance abuse.)
☐ Below: ☐ [Attachment 1b.](#) ☐ Other (specify):

2. ☐ **Visitation (Parenting Time).**

Note: Unless specifically ordered, a child's holiday schedule order has priority over the regular parenting time.

- a. ☐ Reasonable right of parenting time (visitation) to the party without physical custody **(not appropriate in cases involving domestic violence).**
- b. ☐ See the attached _____ -page document dated (specify date):
- c. ☐ The parties will go to child custody mediation or child custody recommending counseling at (specify date, time, and location):
- d. ☐ No visitation (parenting time).

- ☐
- Below
- ☐
- [in Attachment 3a\(2\)](#)
- ☐
- Other (specify):

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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(3) I ask for the following orders about the supervised visitation provider:

(a) Visitation (parenting time) be monitored by (name, if known):

(i) ☐ The person or agency is a professional provider. A professional provider must meet the requirements listed in *Declaration of Supervised Visitation Provider (Professional)* (form FL-324(P)) and sign the declaration.

(ii) ☐ The person is a nonprofessional provider. That person must meet the requirements listed in *Declaration of Supervised Visitation Provider (Nonprofessional)* (form FL-324(NP)) and sign a declaration.

(iii) The provider's phone number is (specify):

(b) Any costs of supervision be paid as follows: petitioner: _____ percent; respondent: _____ percent.
other parent/party: _____ percent.

b. ☐ **Unsupervised visitation (parenting time)**

(Complete 3b only if you want the court to order unsupervised visitation to a person alleged to have a history of abuse or substance abuse.)

(1) ☐ Petitioner ☐ Respondent ☐ Other parent/party is (or are) alleged to have a history of abuse against any of the following persons: a child, the other parent, their current spouse, or the person they live with or are dating or engaged to.

(2) ☐ Petitioner ☐ Respondent ☐ Other parent/party is (or are) alleged to have the habitual or continual illegal use of controlled substances, or the habitual or continual abuse of alcohol, or the habitual or continual abuse of prescribed controlled substances.

(3) Even though there are allegations of a history of abuse or substance abuse, I request that the court order unsupervised visitation to (specify): ☐ Petitioner ☐ Respondent ☐ Other parent/party

(4) The reasons why the court should make the orders are (specify):
(Write the reasons why you think it would be good for the children that the person(s) be granted unsupervised visitation (parenting time) even though there are allegations against them of a history of abuse or substance abuse.)

☐ Below: ☐ in Attachment 3b. ☐ Other (specify):

(5) The orders for visitation (parenting time) that you request must be specific as to time, day, place, and manner of transfer of the child, as Family Code section 6323(c) requires.

4. ☐ **Transportation for visitation (parenting time) and place of exchange**

Note: In cases of domestic violence, the court must have enough information to make orders that are specific as to the time, place, and manner of transfer (exchange) of the child for custody and visitation under Family Code section 6323(c).

a. The children must be driven only by a licensed and insured driver. The vehicle must be legally registered with the Department of Motor Vehicles and must have child restraint devices properly installed, as required by law.

b. ☐ Transportation to begin the visits will be provided by (name):

c. ☐ Transportation from the visits will be provided by (name):

d. ☐ The exchange point at the beginning of the visit will be (address):

e. ☐ The exchange point at the end of the visit will be (address):

f. ☐ During the exchanges, the party driving the children will wait in the car and the other party will wait in the home (or exchange location) while the children go between the car and the home (or exchange location).

g. ☐ Other (specify):

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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5. ☐ **Travel with children** The ☐ Petitioner ☐ Respondent ☐ Other parent/party **must** have written permission from the other parent or party, or a court order, to take the children out of the following places:
- a. ☐ the state of California.
 - b. ☐ the following counties (*specify*):
 - c. ☐ other places (*specify*):
6. ☐ **Child abduction prevention.** There is a risk that one of the parties will take the children out of California without the other party's permission. I request the orders set out on attached [form FL-312](#).
7. ☐ **Children's holiday schedule.** I request the holiday and vacation schedule set out ☐ below ☐ [on form FL-341\(C\)](#)
8. ☐ **Additional custody provisions.** I request the additional orders for custody set out ☐ below ☐ [on form FL-341\(D\)](#)
9. ☐ **Joint legal custody provisions.** I request joint legal custody and want the additional orders set out ☐ below ☐ [on form FL-341\(E\)](#)
10. ☐ **Other.** I request the following additional orders (*specify*):



1. ☐ RESTRAINING ORDER INFORMATION

a. ☐ No domestic violence restraining/protective orders are now in effect between the parties in this case.

b. ☐ I agree that one or more domestic violence restraining/protective orders are now in effect between the parties in this case.

3. ☐ CHILD SUPPORT
- a. I have completed and filed a current *Income and Expense Declaration* () or, if eligible, a current *Financial Statement (Simplified)* (form FL-155) to support my responsive declaration.
- b. ☐ I consent to the order requested.
- c. ☐ I consent to guideline support.
- d. ☐ I do not consent to the order requested ☐ but I consent to the following order:

- 33 / 37

PETITIONER: RESPONDENT: OTHER PARENT/PARTY:	CASE NUMBER:
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5. ☐ PROPERTY CONTROL
- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
6. ☐ ATTORNEY'S FEES AND COSTS
- a. I have completed and filed a current *Income and Expense Declaration* (form) to support my responsive declaration.
- b. I have completed and filed with this form a *Supporting Declaration for Attorney's Fees and Costs Attachment* (form) or a declaration that addresses the factors covered in that form.
- c. ☐ I consent to the order requested.
- d. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
7. ☐ OTHER ORDERS REQUESTED
- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
8. ☐ TIME FOR SERVICE / TIME UNTIL HEARING
- a. ☐ I consent to the order requested.
- b. ☐ I do not consent to the order requested ☐ but I consent to the following order:
-
9. ☐ FACTS TO SUPPORT my responsive declaration are listed below. The facts that I write and attach to this form cannot be longer than 10 pages, unless the court gives me permission. ☐

I declare under penalty of perjury under the laws of the State of California that the information provided in this form and all attachments is true and correct.

Date: _____

(TYPE OR PRINT NAME)

u _____

(SIGNATURE OF DECLARANT)

HOLIDAY SCHEDULE

Exchange times (unless noted): **10:00 a.m.** start → **next day 10:00 a.m.** (single-day) or as specified.

Fall / Winter

- **Halloween (Oct 31):**
 - **Even years:** Parent A from **3:00 p.m.–9:00 p.m.** (or end of trick-or-treat), then return to custodial parent.
 - **Odd years:** Parent B same hours.
 - If a school day, parent holding Halloween returns child by **8:30 a.m.** next school day.
- **Thanksgiving** (Wed after school → Sun 6:00 p.m.):
 - **Even years:** Parent B.
 - **Odd years:** Parent A.
 - If no school, start **Wed 10:00 a.m.**
- **Winter Break** (per school calendar; priority over regular schedule):
 - Split into **Two Halves**.
 - **First Half:** From school release on last day of school → **Dec 26 at 10:00 a.m.**
 - **Second Half:** **Dec 26 at 10:00 a.m. → day before school resumes at 6:00 p.m.**
 - **Even years:** Parent A gets **First Half**, Parent B gets **Second Half**.
 - **Odd years:** Reverse.
 - **Christmas Day (Dec 25)** is included in whichever half contains that date (no extra carve-out).
 - **New Year's Eve/Day** fall into the second half.

Spring

- **Presidents' Day Weekend** (Fri after school → Mon 6:00 p.m.):
 - **Even years:** Parent A.

- **Odd years:** Parent B.
- **Spring Break** (per school calendar; Fri after school → day before school resumes 6:00 p.m.):
 - **Even years:** Parent B.
 - **Odd years:** Parent A.
- **Easter/Passover** (choose one approach):
 - **Option 1 (simple):** Included within Spring Break—no separate switch.
 - **Option 2 (observance day):** If not in Spring Break, **Even years Parent A / Odd years Parent B, 9:00 a.m.–8:00 p.m.**

Summer

- **Memorial Day Weekend** (Fri after school → Mon 6:00 p.m.):
 - **Even years:** Parent B.
 - **Odd years:** Parent A.
- **Fourth of July** (July 4, 9:00 a.m.–July 5, 10:00 a.m.):
 - **Even years:** Parent A.
 - **Odd years:** Parent B.
- **Labor Day Weekend** (Fri after school → Mon 6:00 p.m.):
 - **Even years:** Parent A.
 - **Odd years:** Parent B.
- **Summer Vacation (extended time):**
 - Each parent may have up to **2 non-consecutive weeks** (14 nights total) during summer break, with **30 days’ written notice** and no less than **14 days** before each week. Summer selections may not overlap the other parent’s reserved weeks or the other parent’s already-assigned holidays.

Special Days (always every year, not alternating)

- **Mother’s Day (Sun 9:00 a.m.–7:00 p.m.):** With **Mother** every year.
- **Father’s Day (Sun 9:00 a.m.–7:00 p.m.):** With **Father** every year.

- **Child's Birthday:**
 - If on a school day: dinner **5:00–8:00 p.m.** with the **non-custodial parent** that day.
 - If not a school day: split **9:00 a.m.–2:00 p.m. / 2:00–7:00 p.m.**, with the **parent not having the regular day** choosing first half in even years and second half in odd years.
- **Parents' Birthdays (optional): 5:00–8:00 p.m.** dinner with the celebrating parent if it falls on the other's day (school day only; otherwise 10:00 a.m.–7:00 p.m.).

School/Non-Instructional Days

- When a parent has the child the night **before a teacher in-service/non-instructional day**, that parent keeps the child **until 6:00 p.m.** that day (unless superseded by a holiday above).

Exchanges & Logistics

- **Exchange Location:**
 - **School release** when school is in session.
 - Otherwise, **receiving parent's residence** at the stated start time.
- **Running Late:** Notify immediately; more than **15 minutes late** without notice = loss of that exchange time for that day (no make-up).
- **Make-Up Time:** Only by **written agreement** (text or email is fine) within **30 days**.
- **Right of First Refusal (optional):** If a parent will be unavailable for **8+ consecutive hours** during their time, offer the time to the other parent before using third-party care (except scho