

ERIC B. JONES (*IN PRO PER*)
ADDRESS
CITY, CA ZIP
Tel: (415) 123-4567
Email: email address

In pro per, as Trustee of the LARRY LASAGNA 2002 REVOCABLE TRUST,
and as Executor of the ESTATE OF LARRY LASAGNA, Deceased,

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF [NAME COUNTY]**

) IN RE THE ESTATE OF JUDY [SURNAME]
)

)) CASE NO. RP21094431
)

)) NAME OF THE DOCUMENT FOR
)

)) EXAMPLE "EX PARTE APPLICATION
)

)) REQUESTING COURT ISSUE A
)

)) TEMPORARY RESTRAINING ORDER
)

)) AGAINST DEFENDANT BENEFICIARY
)

))
)

)) Date: February 9, 2024
)

)) Time: 10:30 AM
)

)) Dept.: Probate, 201
)

)) Action Filed: July 13, 2021
)

)) Reservation ID: 780799297986
)

1.
DATED: 2023

Respectfully submitted,

LAW OFFICE OF DAVID W. TATE

By:

DAVID W. TATE, ESQ.
Attorneys for all Respondents and
Moving Parties

1 DECLARATION
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3 OF
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5 ERIC
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8 B.
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11 JONES
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14 FOR
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16 GOOD
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18 CAUSE
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21 EXCEPTION
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23 TO
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26 NOTICE
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28 REQUIREMENT

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3 SUPERIOR
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5 COUR T
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8 OF
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10 CALIFORNIA
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12 COUNTY
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20 ANGELES
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22 -
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24
25 PROBA TE
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27 DIVISION
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Declaration for Good Cause
Declaration for Good Cause

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3 I,
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5 Eric
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8 B.
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10 Jones,
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12 declare
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15 as
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17 follows:
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21 1.
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24 I
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26 am
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1 the
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3 Petitioner
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5 in
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7 this
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10 action
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12 and
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15 have
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17 personal
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20 knowledge
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22 of
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25 the
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27 facts
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1 stated
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4 herein.
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8 2.
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10 I
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12 am
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15 bringing
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17 this
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19 ex
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22 parte
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25 application
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27 to
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1 prevent
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3 the
4 immediate
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6 and
7 irreparable
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9 harm
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11 of
12 the
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14 destruction
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16 of
17 digital

1 evidence
2 and
3 the
4 potential
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8 dissipation
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10 of
11 trust
12 assets
13 by
14 the
15 respondents.
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27 The
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2 core
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4 of
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6 my
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8 petition
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10 relies
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12 on
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14 evidence
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16 from
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18 a
19 "decoy"
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21 phone"

1 and
2 financial
3 records
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5 that
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7 are
8 under
9 the
10 control
11 of
12 the
13 respondents.

1 3.
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3 I
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5 have
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8 not
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10 given
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12 notice
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15 of
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17 this
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19 ex
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21 parte
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23 application
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25 to
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2 the
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4 opposing
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6 parties
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8 as
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10 required
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12 by
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14 CRC
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17 3.1203.
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22 4.
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25 I
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27 respectfully
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1 request
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4 that
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6 the
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9 Court
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11 grant
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16 good
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18 cause
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20 exception
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23 to
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1 notice
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3 requirement
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5 under
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8 CRC
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10 3.1204(b)(3)
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12 for
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14 the
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16 following
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18 reason:
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20 Giving
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22 advance
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25 notice
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4 this
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6 application,
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9 which
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11 specifically
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14 seeks
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16 to
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19 secure
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23 examine
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26 digital
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1 evidence
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8 decoy
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10 phone),
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12 would
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15 almost
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17 certainly
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20 cause
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25 respondents
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1 alter,
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3 conceal,
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5 or
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7 destroy
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10 that
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12 very
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14 evidence
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16 before the Court has an opportunity to issue an order.
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18 5. My previous attempts to resolve these matters informally have been met with evasion and
19 hostility. On September 15, 2025, a prior attempt to address these issues was rejected, causing
20 significant personal and familial strain. I am concerned that providing notice now, before a court
21 order is in place, will be seen by the respondents not as a legal formality, but as a final warning
22 to eliminate any incriminating evidence.
23
24 6. Therefore, a good cause exception to the notice requirement is necessary to protect the
25 integrity of the evidence and prevent the irreparable harm that would result from its destruction.
26 I declare under penalty of perjury under the laws of the State of California that the foregoing is
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1 true and correct.

2 Executed on October 30, 2025, at Temple City, California.

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