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## EXHIBIT D

### Declaration of Nuha Sayegh

Under Penalty of Perjury (California Code of Civil Procedure § 2015.5)

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## DECLARATION OF NUHA SAYEGH

I, Nuha Sayegh, declare:

1. I am over the age of 18 and competent to testify to the matters stated herein. I have personal knowledge of the facts set forth in this declaration.
2. On May 19, 2025, I was present at a family meeting at the estate property located at 17742 Berta Canyon Road, Salinas, California. The meeting was attended by Eric Jones, Heidi Marichen Jones Blanchard, and Gretchen Angela Jones.

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### I. AUTHORIZATION TO DOCUMENT THE MEETING

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1. At the commencement of this meeting, Heidi Blanchard explicitly requested that I serve as the record keeper for the discussion. Heidi Blanchard asked me directly: "**Nuha, are you writing notes? I think it would be helpful.**"
2. Based on this direct request from the adverse party, I took detailed, contemporaneous notes of the proceedings. The statements detailed below are from the written notes that Heidi Blanchard requested I create.

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### II. ADMISSION OF EXECUTOR STATUS

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1. During the meeting, Eric Jones asked: "Mom chose me to be the executor. Is that a fact?"

I witnessed Heidi Blanchard respond affirmatively: “**Yeah, okay.**”

2. Immediately following this acknowledgement, Heidi Blanchard instructed Eric Jones to execute his duties. She stated: “**So the first thing that you need to do as the executor, you need to start the probate process.**”
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### III. EVIDENCE OF BAD FAITH ASSET CONVERSION

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1. During this meeting, Heidi Blanchard admitted to listing the Trust’s 2013 Mercedes-Benz for sale on Craigslist for **\$11,000**.
  2. Crucially, Heidi Blanchard acknowledged that she lacked the authority to sell the vehicle without the Trustee’s consent. She stated to Eric Jones: “**I don’t know if you, if you don’t agree, we can take it off.**”
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### IV. EVIDENCE OF SPOILATION

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1. Regarding the decedent’s iPhone, Heidi Blanchard stated: “**I just need it for a couple more days access. I don’t need to have it.**”

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

Executed on December 3, 2025, at Temple City, California.

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Nuha Sayegh  
Declarant

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**END OF EXHIBIT D**

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