

1 FAHED FREDDY SAYEGH
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6 IN PRO PER
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10 NUHA SAYEGH
11 Petitioner,

12 v.
13 FAHED SAYEGH,
14 Respondent.

CASE NO: 25PDRO01260
(r/w 25PDFL01441 (dissolution lead)
(r/w 25PDFL01460 (related dv matter)

[PROPOSED] SUPPLEMENTAL NOTICE
OF MOTION AND MOTION FOR
RECONSIDERATION. DECL. FAHED
SAYEGH [Code Civ. Proc., § 1008(a); in the
alternative §§ 533; Fam. Code § 6345; Fam.
Code § 217]

15
16 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
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18 PLEASE TAKE NOTICE TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

19 PLEASE TAKE NOTICE that on November 19, 2025 , at 8:30 AM, or as soon thereafter as the
20 matter may be heard in Dept. L of the Pasadena Courthouse, Respondent Fahed “Freddy” Sayegh
21 will and hereby does move the Court to reconsider its October 15, 2025 orders (the “October 15
22 Order”) pursuant to Code of Civil Procedure § 1008(a).

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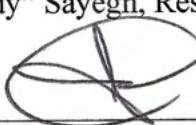
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28 **SUPPLEMENTAL NOTICE OF MOTION AND MOTION FOR RECONSIDERATION**

1 This motion is based on this notice, the attached Memorandum of Points and Authorities, the
2 Declaration of Fahed Sayegh and exhibits, the records and files in this action, and any further
3 evidence the Court may permit.

4 Dated: 10-25-20

5 Fahed "Freddy" Sayegh, Respondent in Pro Per

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Respondent respectfully requests reconsideration to permit a complete evidentiary record under Family Code § 217 with live testimony and authenticated exhibits. The October 15 setting addressed urgent access-to-children concerns; given late supplemental filings and only two court days, Respondent could not secure experts, percipient witnesses, or records custodians. A brief evidentiary setting will promote accuracy and finality without attributing fault to any participant. Respondent does not seek a second bite at the apple; he seeks the basic due-process protections that family law expressly preserves—live testimony, timely cross-examination, and the opportunity to present exculpatory evidence—so any order rests on a reliable record.

II. NEW OR DIFFERENT FACTS DISCOVERED AFTER THE HEARING (CCP § 1008(a))

A motion for reconsideration may be granted upon new or different facts, circumstances, or law. (CCP § 1008(a).) This motion is supported by facts that arose after the October 15 hearing and could not, with reasonable diligence, have been presented that day.

Timeliness and alternative authority. To the extent § 1008(a)'s 10-day clock applies, this application is timely upon service of written notice of entry of the October 15 Order. Independently, the Court retains inherent authority to correct interim rulings when apprised of new facts (*Le Francois v. Goel* (2005) 35 Cal.4th 1094), may modify injunctive relief upon changed facts (CCP § 533), and may modify DVROs on changed circumstances (Fam. Code § 6345).

A. [August 26, 2025 Incident] DCFS school interview (occurred Oct. 16; learned Oct. 19).

On October 16, 2025, at approximately 1:20 p.m., Los Angeles County DCFS social worker Tyler Polk interviewed the minor at Eliot Middle School. The minor reported that

1 Petitioner instructed her to tell DCFS that (a) she saw Respondent assault Petitioner, (b)
2 she observed injuries on Petitioner, (c) she and Petitioner were at Respondent's Sonoma
3 Drive residence on August 26, and (d) she had seen Respondent assault Petitioner on
4 prior occasions. The minor expressly denied each assertion: she stated she did not witness
5 any assault; she did not see injuries; she was not at the Sonoma residence that day; and
6 she has never seen Respondent assault or abuse Petitioner. She further reported that
7 Petitioner told her that Respondent had initiated the case and was trying to take the
8 children, and that Petitioner had her repeat false statements to a social worker regarding
9 alleged child abuse. The minor also stated that, in her experience, Respondent has not
10 been violent toward her or her brother. These statements—first learned on October 19—
11 are material, noncumulative, and outcome-determinative; they go directly to credibility
12 and alleged coaching and could not, with reasonable diligence, have been presented on
13 October 15. Respondent will subpoena Mr. Polk to testify and will seek admission of
14 related DCFS records as official records (Evid. Code, § 1280), subject to appropriate
15 protective orders and, if necessary, in-camera review (Welf. & Inst. Code, § 827; Cal.
16 Rules of Court, rules 5.552, 2.550–2.551). Petitioner's directives are admissible as party
17 admissions (Evid. Code, § 1220) and, to the extent inconsistent with her testimony, as
18 prior inconsistent statements (Evid. Code, § 1235); the minor's statements are relevant to
19 credibility, bias, and motive (Evid. Code, § 780), with authentication as required (Evid.
20 Code, §§ 1400–1402).B. June 8, 2025 messages recovered Oct. 19 from the minor's
21 phone. Same-day messages from Mother describe hand/eye issues and needing rest, with
22 an inline photo of Mother's hand—no mention of assault. These contemporaneous
23 statements support a non-assault explanation and contradict later testimony. (Evid. Code
24 § 780.) They are party admissions (Evid. Code § 1220) and will be authenticated by
25 device screenshots/metadata and, if necessary, a custodian declaration.

1 B. [June 8, 2025 Incident] June 8, 2025 messages discovered Oct. 19 (attached). On
2 October 19, 2025, Respondent recovered from the minor's iPhone a contemporaneous
3 June 8, 2025 message thread in which Mother reports she "can't move" her hands and
4 that "something weird is going on in my eye," and says she needs to rest; the thread
5 includes an inline, same-day photograph of her hand. There is no mention of any assault.
6 These statements are admissible as party admissions (Evid. Code, § 1220) and constitute
7 powerful impeachment under Evidence Code section 780 because they support a non-
8 assault, medical/cosmetic explanation inconsistent with Mother's later testimony.
9 Authentication will be established via device screenshots/metadata and testimony from a
10 recipient and/or a records custodian (Evid. Code, §§ 1400–1402; see People v. Goldsmith
11 (2014) 59 Cal.4th 258, 267–268 [ESI/photo authentication]; People v. Valdez (2011) 201
12 Cal.App.4th 1429, 1435–1436 [social-media/text authentication]). Because these
13 materials were not reasonably available on October 15, they qualify as "new or different
14 facts" within the meaning of Code of Civil Procedure section 1008, subdivision (a) and
15 would materially affect credibility and mechanism-of-injury findings. (Exhibit "A" June
16 8 Messages.) Two additional June 8 points from the same thread. In the mid-afternoon
17 sub-thread, Petitioner texted "Mia Milo?" and the minor replied "Dad has him,"
18 identifying the cat's location with "Dad." In context with the other June 8 messages—and
19 corroborated by family routine—this shows the children were with their grandmother at
20 Respondent's father's home (with Respondent), not with Petitioner, during the period
21 Petitioner later claimed an assault occurred. That evening Petitioner also texted "good
22 night" to the minor, further indicating the children did not come to Petitioner's home on
23 June 8 and could not have "witnessed" any incident there. Petitioner's statements are
24 admissible as party admissions (Evid. Code, § 1220) and, together with the minor's
25 contemporaneous messages (to be authenticated and confirmed by live testimony and/or
26 custodian records), provide powerful impeachment under Evidence Code section 780 of
27 the later claim that the children observed a June 8 assault. (Exhibit "A.2" June 8
28 Messages.) In addition copies of the texts messages sent to respondent and petitioner

1 grandmother on June 8, 2025 describing the same medical reaction attached as exhibit B
2 to establish the importance of the newly discovered evidence in Mias phone after the
3 October 15, 2025 hearing. Attached are true and correct screenshots taken from the
4 minor's iPhone showing an iMessage conversation with Petitioner on June 8–9, 2025.

5 A(2)-1 — June 9, 2025 (Mon.) morning thread continuing from the night of June 8.

6 A(2)-2 — June 8, 2025 at 11:49 p.m. message from Petitioner: "I just wanna make sure
7 you're OK. Tell you good night. I love you. Tell your brother I love him very much and I
8 miss you guys." Mia replies: "Good night I love u too mama."

9 A(2)-3 — June 9, 2025 morning messages from Petitioner discussing work, tutoring, and
10 routine logistics; no mention of any assault the night before.

11 Relevance. These messages corroborate that the children were not with Petitioner on the
12 night of June 8 and that there was no contemporaneous claim of an assault or emergency.
13 The June 8 "good night" exchange at 11:49 p.m. reflects ordinary, non-urgent
14 communication inconsistent with the allegation that the children witnessed a June 8
15 assault. The June 9 morning thread likewise reflects routine planning (work, tutoring,
16 grandmother transportation), again without any report of abuse.

17 Evidentiary basis. Petitioner's statements are admissible as party admissions (Evid. Code,
18 § 1220) and for impeachment/credibility (Evid. Code, § 780). Mia's replies are offered to
19 show timeline, effect on the listener, and context, not for the truth of any matter asserted.
20 Authentication will be established through device screenshots/metadata and, if necessary,
21 testimony of a recipient/user and/or a custodian declaration. (Evid. Code, §§ 1400–1402;
22 see People v. Goldsmith (2014) 59 Cal.4th 258, 267–268 [electronic photo/ESI
23 authentication]; People v. Valdez (2011) 201 Cal.App.4th 1429, 1435–1436 [social-
24 media/text message authentication].)

25 Offered for. (a) to rebut the claim that the children were present for or witnessed any June
26 8 assault; (b) to show Petitioner made no same-day report of injury or danger; (c) to
27

1 support a non-assault narrative consistent with Exhibit A (June 8 “hand/eye” messages)
2 and to impeach later testimony.

3 C. [November 4, 2023 Incident] Cosmetic-provider identification enabling subpoenas
4 (discovered Oct. 22, 2025). On October 22, 2025, Respondent received a July 19, 2024
5 family-group text thread in which Petitioner discusses “Botox and fillers” at a provider in
6 Old Town Pasadena and attaches photos of the provider’s card and pricing sheet.
7 Petitioner wrote: “The doctor I go to here in Old Town whoever I bring in not only do I
8 get 50% off of this and Botox and fillers … so does the person I bring in … Cash
9 though,” and “He’s Jordanian, whatever filler or Botox you don’t use he puts your name
10 on saves for next time. Beautiful place he’s in right by Tiffany’s.” She added, “I’m gonna
11 try to go get some more today or maybe I’ll call them to see if they have any.” The
12 attached photos show “Medical Weight Loss and Beauty — Dr. James Kojian, M.D., 24
13 E. Colorado Blvd., Pasadena, CA 91105, (626) 777-7900 (text only).” This newly
14 discovered identification—together with prior references to LA Beauty Skin Center/Dr.
15 Arman F. Karapetyan—now allows targeted subpoenas for appointment logs, consent
16 forms, procedure notes, and invoices around November 3–4, 2023 (the date of the “lip”
17 image). The texts are admissible as party admissions and for impeachment (Evid. Code,
18 §§ 1220, 780) and will be authenticated via device screenshots/metadata and recipient or
19 custodian testimony (Evid. Code, §§ 1400–1402; see People v. Goldsmith (2014) 59
20 Cal.4th 258, 267–268; People v. Valdez (2011) 201 Cal.App.4th 1429, 1435–1436).
21 Respondent seeks leave to issue narrowly tailored business-records subpoenas with
22 consumer notice and protective orders addressing privacy. (CCP §§ 1985.3, 1985.6; Civ.
23 Code, § 56 et seq.; CRC 2.550–2.551.) (Exhibit “B” June 8 Messages.)

24 D. Diligence and supplementation. Transcript requests were submitted Oct. 15 and Oct. 19
25 (both returned “case not found”) and resubmitted Oct. 23 (pending). Respondent will
26 promptly lodge certified excerpts upon receipt.
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1 **III. REQUEST FOR RECONSIDERATION TO PERMIT A COMPLETE**
2 **EVIDENTIARY RECORD**

3 A. Family Code § 217 / Elkins — live testimony. The October 15 setting did not include live
4 testimony within the limited time available. § 217 presumes oral testimony in contested family
5 hearings upon request; denial requires good-cause findings on the record. Respondent requests a
6 short live-witness hearing to evaluate credibility, timeline, and mechanism of injury. Petitioner
7 served a supplemental declaration on Friday, October 10, 2025, at approximately 8:00 p.m., for a
8 Tuesday 8:00 a.m. hearing—leaving two court days to subpoena experts, percipient witnesses,
9 and custodians. Excluding impeachment that bears directly on credibility and outcome is
10 reversible error. (See *In re Marriage of Lippel* (1990) 51 Cal.3d 1160; *In re Marriage of Carlsson*
11 (2008) 163 Cal.App.4th 281.)

13 B. Evidence on a limited record. Certain collateral items were received without foundational
14 witnesses, while central impeachment/exculpatory materials (experts, percipient witnesses,
15 custodians) were unreachable in the time available. A brief Evid. Code § 352/§§ 1400–1402
16 foundation hearing will allow both sides to present authenticated, probative evidence and avoid
17 collateral confusion (e.g., an old “broken window” photo previously received without disclosure
18 or authentication). Respondent requests a brief Evidence Code § 402 foundation hearing and
19 rulings under §§ 350, 352, and 1400–1402 before admitting collateral, undated, or
20 unauthenticated images (e.g., the circa-2011 “broken window” photo served mid-hearing).

21 C. Practical constraints. Late-week supplemental materials left only two court days for
22 subpoenas. A short evidentiary setting is needed for proper foundation and cross-examination.

24 D. Reliability and tailoring. A complete record will aid reliable DVPA findings and ensure any
25 relief is narrowly tailored to present circumstances. The DVPA permits relief upon reasonable
26 proof of a past act of abuse (Fam. Code § 6300), but that proof must be reliable and tied to

1 present need. A short § 217 hearing ensures any relief is narrowly tailored to current
2 circumstances.

3 E. Credibility, motive, bias. Live testimony is necessary to evaluate credibility and alleged
4 coaching. (Evid. Code § 780.)

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6 **IV. WHY RESPONDENT PROCEEDED ON OCT. 15 (NO WAIVER OF § 217 / ELKINS
7 RIGHTS)**

8 Respondent appeared on Oct. 15 to address urgent access-to-children issues. On Oct. 6, he filed
9 an Ex Parte Application for a Non-Interference Order; the Court denied ex parte relief and rolled
10 that request to Oct. 15. Proceeding that day to seek non-interference/contact relief did not reflect
11 readiness to try newly served allegations; it reflected necessity. With only two court days,
12 Respondent could not secure experts, percipient witnesses, or records custodians. He agreed to
13 proceed and stated he was “ready” because he needed an order permitting him to see and speak
14 with the children. He had seen one child once (~2 hours) in ~six weeks; any 45–60 day
15 continuance to secure experts/subpoenas would have pushed contact toward four months.
16

17 **V. OFFER OF PROOF (IF RECONSIDERATION IS GRANTED)**

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19 Treating/Procedural Physician(s) (lip injections) — in the alternative: Dr. Arman F.
20 Karapetyan, M.D. (LA Beauty Skin Center) and/or Dr. James Kojian, M.D. (Medical Weight
21 Loss and Beauty, 24 E. Colorado Blvd., Pasadena, CA 91105). Anticipated testimony:
22 authenticate treatment/aftercare records for lip filler injections performed on or about November
23 3, 2023 (or as shown by the records); opinions that the appearance in the “lip” images is
24 consistent with post-injection effects (ecchymosis/edema/border pattern) and inconsistent with
25 blunt-force trauma. Foundations: Evid. Code §§ 720, 801–802; authentication §§ 1400–1402;
26 business-records §§ 1271, 1560–1561. Records will be obtained by subpoena duces tecum with
27 Petitioner’s authorization or, if necessary, a narrowly tailored court order and protective terms
28 under HIPAA/CMIA (45 C.F.R. § 164.512(e); Civ. Code §§ 56.10–56.16; see also Welf. & Inst.

1 Code § 827; CRC 2.550–2.551, 5.552). If neither treating provider can be confirmed or
2 produced, Respondent will call an independent, board-certified dermatologist/plastic surgeon as
3 an expert on mechanism of injury.

4 □ Special-Effects/Makeup Expert — photographic artifacts inconsistent with trauma;
5 reproducible demonstration. Evid. Code §§ 720, 801–802. (If the Court prefers one expert,
6 Respondent will proceed with the treating/independent physician alone and submit SFX analysis
7 by declaration.)

8 □ Tuesday Housekeeper (11:00–4:00) — no altercation; neither parent present on August 26
9 during the claimed window. Evid. Code § 702.

10 □ Deputy District Attorney Sara Antoun — Petitioner’s recantation/reduction regarding January
11 19, 2022; lack of corroboration. Evid. Code §§ 780, 1235, 1280.

12 □ Detective Lohmann — Petitioner’s recantations; notes; BWV/dispatch indices. Evid. Code §§
13 780, 1235, 1280.

14 □ Records Custodians — authenticate neutral, time-stamped records: school
15 attendance/checkout; carrier metadata; ARCO 10:19; Home Depot 11:03; livestream 6:30–8:30;
16 Dodgers ticketing/turnstile 7:10. Evid. Code §§ 1271, 1560–1561; 780.

17 □ Tyler Polk (DCFS) — October 16 school interview; statements regarding August 26 and
18 coaching; DCFS records authentication. Evid. Code §§ 1280, 1220, 1235, 780.

19 Proposed § 217 plan (~2.5 hours): Respondent (15); Polk (25); Housekeeper (20); Physician
20 (25); SFX expert (20) [optional]; Records custodian (20); cross (30); argument (25).

1 **VI. TIMELINE HIGHLIGHTS**

- 2 • Jan. 19, 2022 — Petitioner recanted to Antoun/Lohmann; admitted in court she was under the
3 influence and the aggressor; acknowledged makeup embellishment.
- 4
- 5 • Nov. 4, 2023 — “Lip” image consistent with cosmetic injections.
- 6
- 7 • June 8, 2025 — Same-day messages/photo (found Oct. 19) show Fahed Sayegh and the
8 children not with mother and that Nuha Sayegh woke up with the eye and hand swollen.
- 9
- 10 • Aug. 26, 2025 — Did not occur per child’s school interview with social worker on October 19,
11 2025; child reports coaching.
- 12 • Sept. 8, 2025 — “Kidnapping” claim contradicted by neutral timestamps (school → dinner →
13 Dodgers game; FaceTime from stadium).
- 14 • Sept. 17, 2025 — Uncorroborated false police report.
- 15

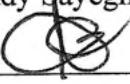
16 **VII. CONSEQUENCES ALREADY SUFFERED & PROGRAMS COMPLETED (JAN.**

17 **19, 2022)** Without conceding the allegation, even if the Court does not credit the makeup point,
18 Respondent has already borne substantial consequences and completed extensive rehabilitation:
19 A. Family/Custody: ~9 months loss of placement; 18 months DCFS; ~9 months out of home;
20 public stigma. B. Programs (All Completed): 52-week DV (The High Road, Pasadena); 52-week
21 family therapy (Hannah Joo, LMFT); 18 DCFS family meetings + Feb. 8, 2023 Family
22 Engagement; couples counseling (Regain.us: Anderson, LMFT; Harris, LCSW); therapy
23 groupinars (Apr. 5 & 7, 2022); individual therapy (Dr. Stan Rushing); parenting: Up to Parents
24 (6 hrs, 3/17/2022); CALPARENTS/Child Parent Institute (Transitioning to Co-Parenting;
25 Managing Family Anger; Positive Parenting).

1 **VIII. SANCTIONS CONTENTIONS ARE UNFOUNDED (CCP § 128.7; FAM. CODE §**
2 **271)** A. Section 128.7 compliance. A § 128.7 motion requires separate service and a 21-day safe
3 harbor before filing; absent strict compliance, sanctions are unavailable. B. Good-faith basis and
4 diligence. This motion relies on post-hearing facts (DCFS interview; June 8 messages), a
5 statutory entitlement to live testimony (§ 217; Elkins), and prompt transcript requests. It is timely
6 and narrowly tailored. C. Family Code § 271. § 271 requires notice and a finding that conduct
7 frustrated settlement or unreasonably increased costs, with consideration of ability to pay;
8 sanctions may not be punitive. Respondent has proposed a brief § 217 hearing and a modest
9 supplemental schedule—conduct that reduces, not increases, cost. D. Meet-and-confer /
10 stipulation. Respondent invites a stipulation for a short § 217 evidentiary hearing and limited
11 supplemental briefing/exhibit schedule.

12 **IX. REQUESTED RELIEF**
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14 Respondent respectfully requests orders: (1) vacating the October 15, 2025 orders; (2) setting a §
15 217 evidentiary hearing (½-day minimum); (3) authorizing issuance of subpoenas (Judicial
16 Council SUBP-001/SUBP-002) for the witnesses/custodians identified above; (4) permitting
17 supplementation with certified transcripts upon receipt; (5) applying Evid. Code § 352
18 even-handedly with proper authentication under §§ 1400–1402; and (6) Pending the § 217
19 evidentiary hearing, issue **interim non-interference/contact orders** restoring ordinary
20 communication and school access consistent with § 3020 and prior minute-order guidance that
21 “there is nothing preventing Respondent from being with, seeing, communicating, or having the
22 children live with him.” (7) granting such further relief as the Court deems just and proper.

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25 Fahed Freddy Sayegh
26 X  10-25-28

27 In Pro Per
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1 **DECLARATION OF FAHED “FREDDY” SAYEGH (SUPPLEMENT)**

2 I, Fahed “Freddy” Sayegh, declare:

4 I am Respondent and the biological father of Mia and Jordan Sayegh. I have personal knowledge
5 of the facts stated and could testify competently thereto.

7 **Procedural History and Exigency**

8 On Sept. 9, 2025, Petitioner filed for a protective order (Case No. 25PDR001246). The Court
9 granted relief as to Petitioner only and denied relief as to the children.

10 On Sept. 12, 2025, I filed my own ex parte request (Case No. 25PDR001260) seeking protection
11 for myself and the children. The ex parte was denied, with a hearing set for Oct. 3, 2025.

13 On Sept. 18, 2025, I filed an ex parte request for visitation and custody in 25PDFL01441; the
14 Court denied ex parte relief for lack of exigency.

16 On Oct. 1, 2025, the Court set matters for Oct. 15, 2025 under this case number and continued
17 the DVRO matter to that date. When I requested emergency orders, the Court stated: “Sir, there
18 is nothing preventing you from being with, seeing, communicating, or having the children live
19 with you.” Despite that statement, Petitioner continued concealing the children and blocking
20 contact.

21 On Oct. 6, 2025, I filed an Ex Parte Application for a Non-Interference Order. The Court denied
22 ex parte relief and rolled that request to be heard on Oct. 15, 2025. Because a 45–60 day
23 continuance to secure experts and serve subpoenas would have resulted in nearly four months
24 without seeing or hearing from my children, I appeared on Oct. 15 to seek immediate
25 non-interference/contact relief while preserving my rights under Family Code § 217/Elkins.
26 Concealment, school disruption, and attempts to locate

1 Since Sept. 8, 2025, Petitioner has concealed the children, blocked their phones/social access,
2 and misrepresented to schools that restraining orders existed against me. She provided unsigned
3 “protective” directives to Eliot Arts and Altadena Arts Magnet stating the children were to be
4 released only to her.

5 Petitioner repeatedly enrolled/un-enrolled the children at different schools (Oak Middle, La
6 Rosa, Eliot Arts Magnet, Altadena Arts Magnet). The children missed consecutive school days
7 (e.g., Sept. 9, 2025 – October 6, 2025). As of early October, I could not confirm enrollment in
8 Monrovia or Pasadena Unified.
9

10 After searching for approximately six weeks, I located Mia on her first day back at school. I was
11 able to see her only once, for approximately two hours. I immediately ensured I could
12 communicate with her by securing contact with her and her phone. On that same day, Petitioner
13 called the police on me despite my full authority to see my children; no lawful order barred my
14 contact.
15

16 On Oct. 1, 2025, I appeared at Monrovia Unified with a witness and presented identification and
17 birth certificates. I cited FERPA and Education Code provisions, yet access was refused absent a
18 custody order. Pasadena Unified confirmed the children were not enrolled there.
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20 When Petitioner’s supplemental declaration added new allegations shortly before the Oct. 15
21 hearing, I had only two court days to respond. I was unable, within that time, to secure
22 attendance of experts, percipient witnesses, or records custodians.
23

New Evidence Discovered After Oct. 15

24 On Oct. 16, 2025, DCFS social worker Tyler Polk interviewed our daughter at Eliot Middle
25 School; I learned of this on Oct. 19. She reported that no incident occurred at my home on Aug.
26 and that neither she nor Petitioner were there; she further reported Petitioner instructed her to
27 say she witnessed an assault, to say she had been hit, and to say I wanted to take the children
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1 away. She has never witnessed me hitting Petitioner. I intend to subpoena Mr. Polk and DCFS
2 records.

3 On Oct. 19, 2025, I recovered messages from our daughter's iPhone reflecting Petitioner's June
4 8, 2025 statements describing hand/eye issues and the need to rest, with a same-day photo of her
5 hand, and no mention of assault. These statements contradict later testimony and are consistent
6 with a non-assault cause.

7
8 On October 22, 2025, I received a July 19, 2024 text thread in which Petitioner and her sister
9 Tina Sayegh discusses "Botox and fillers" at a provider in Old Town Pasadena and attaches
10 photos of the provider's card and pricing sheet. Petitioner wrote: "The doctor I go to here in Old
11 Town whoever I bring in not only do I get 50% off of this and Botox and fillers ... so does the
12 person I bring in ... Cash though," and "He's Jordanian, whatever filler or Botox you don't use
13 he puts your name on saves for next time. Beautiful place he's in right by Tiffany's." She added,
14 "I'm gonna try to go get some more today or maybe I'll call them to see if they have any." The
15 attached photos show "Medical Weight Loss and Beauty — Dr. James Kojian, M.D., 24 E.
16 Colorado Blvd., Pasadena, CA 91105, (626) 777-7900 (text only)." This newly discovered
17 identification—together with prior references to LA Beauty Skin Center/Dr. Arman F.
18 Karapetyan—now allows targeted subpoenas for appointment logs, consent forms, procedure
19 notes, and invoices around November 3–4, 2023 (the date of the "lip" image).

20
21 **Jan. 19, 2022 Incident; Consequences and Programs**

22 Petitioner previously recanted material aspects of the Jan. 19, 2022 allegation to DDA Sara
23 Antoun and Detective Lohmann; in court she admitted being under the influence and the
24 aggressor (sweater/zipper scratch; thrown table) and acknowledged using makeup to embellish
25 injuries. Regardless, I suffered substantial collateral consequences, including approximately nine
26 months without the children, 18 months of DCFS supervision, and removal from the family
27 home for about nine months, and I completed multiple court-approved programs: a 52-week DV
28

1 program (The High Road), 52-week family therapy (Hannah Joo, LMFT), 18 DCFS family
2 meetings plus a Family Engagement Meeting, marriage counseling via Regain.us, individual
3 therapy (Dr. Stan Rushing), and parenting courses through Up to Parents and
4 CALPARENTS/Child Parent Institute (Transitioning to Co-Parenting; Managing Family Anger;
5 Positive Parenting). These facts are offered to address present risk, need, and tailoring—not as a
6 concession of guilt.

7 **Transcripts; supplementation**

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9 I ordered transcripts on Oct. 15 and Oct. 19 (both returned “case not found”) and resubmitted on
10 Oct. 23 (pending). I will promptly supplement this motion with certified transcripts upon receipt.
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12 I declare under penalty of perjury under the laws of the State of California that the foregoing is
13 true and correct. Executed on October 25, 2025, at Altadena, California.

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16 Father Sayerd
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1 I am over the age of 18 years and not a party to this action. My business address is **409 East**
2 **Woodbury Road, Altadena, CA 91001.**

3 On **October 25, 2025**, I served the foregoing document entitled:

4 **SUPPLEMENTAL MOTION FOR RECONSIDERATION**

5 on the following person:

6 **Attorney for Petitioner**

7 **Kirk A. Kolodji, Esq.**

8 Kolodji Family Law, PC

9 35 North Lake Avenue, Suite 710

10 Pasadena, CA 91101

11 Tel: (310) 691-9671

12 Email: kirk@kolodjifamilylaw.com

13 **BY ELECTRONIC SERVICE (CRC 2.251):**

14 Based on a written agreement of the parties to accept service by electronic transmission, I caused
15 the document to be served to the email address listed above.

16 Executed on **October 25, 2025**, at **Altadena, California.**

17 X SAMERA ARKEL X

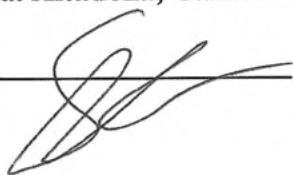
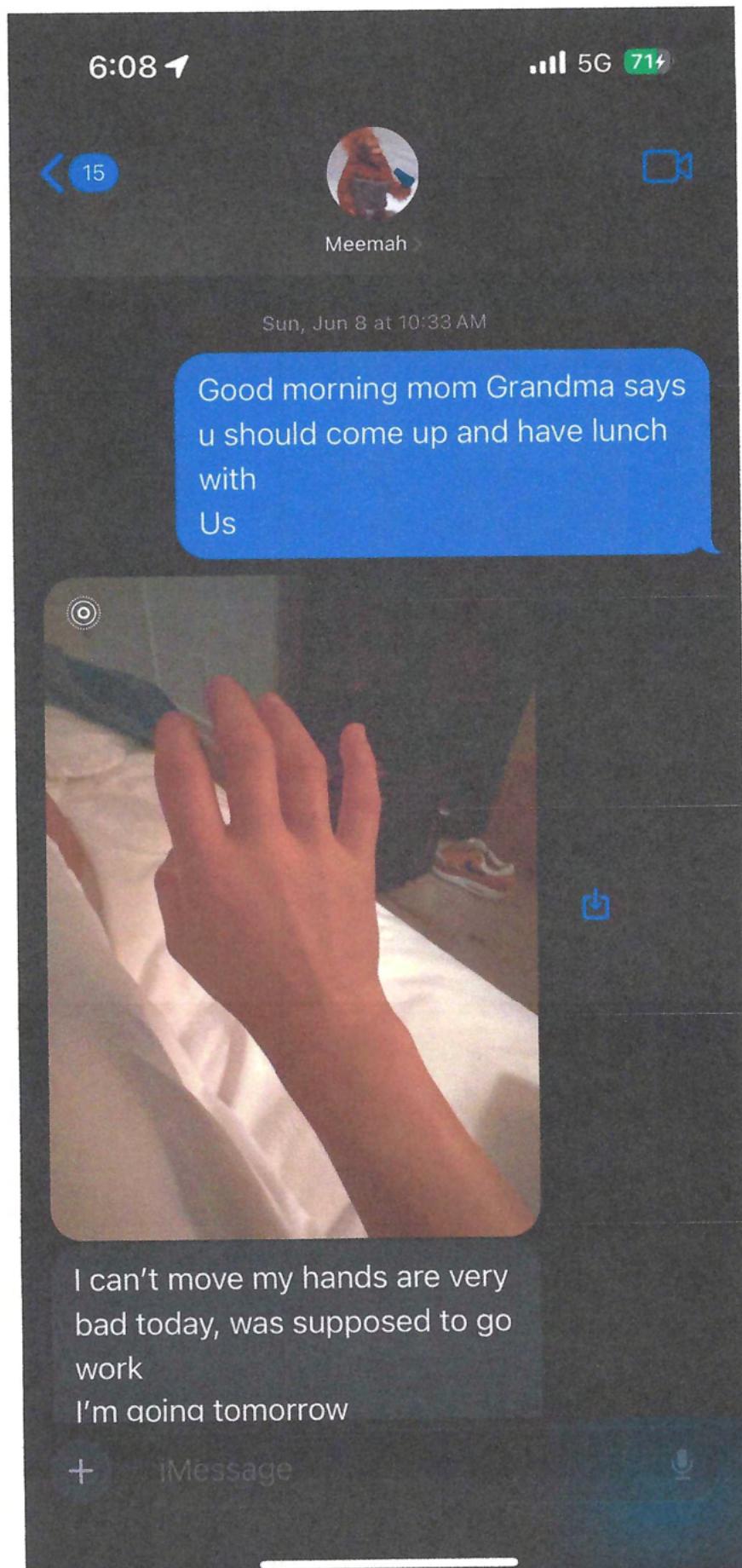


EXHIBIT A

**NEWLY DISCOVERED TEXTS
IN MIA SAYEGH CELL PHONE
DISCOVERED 10/19/2025**



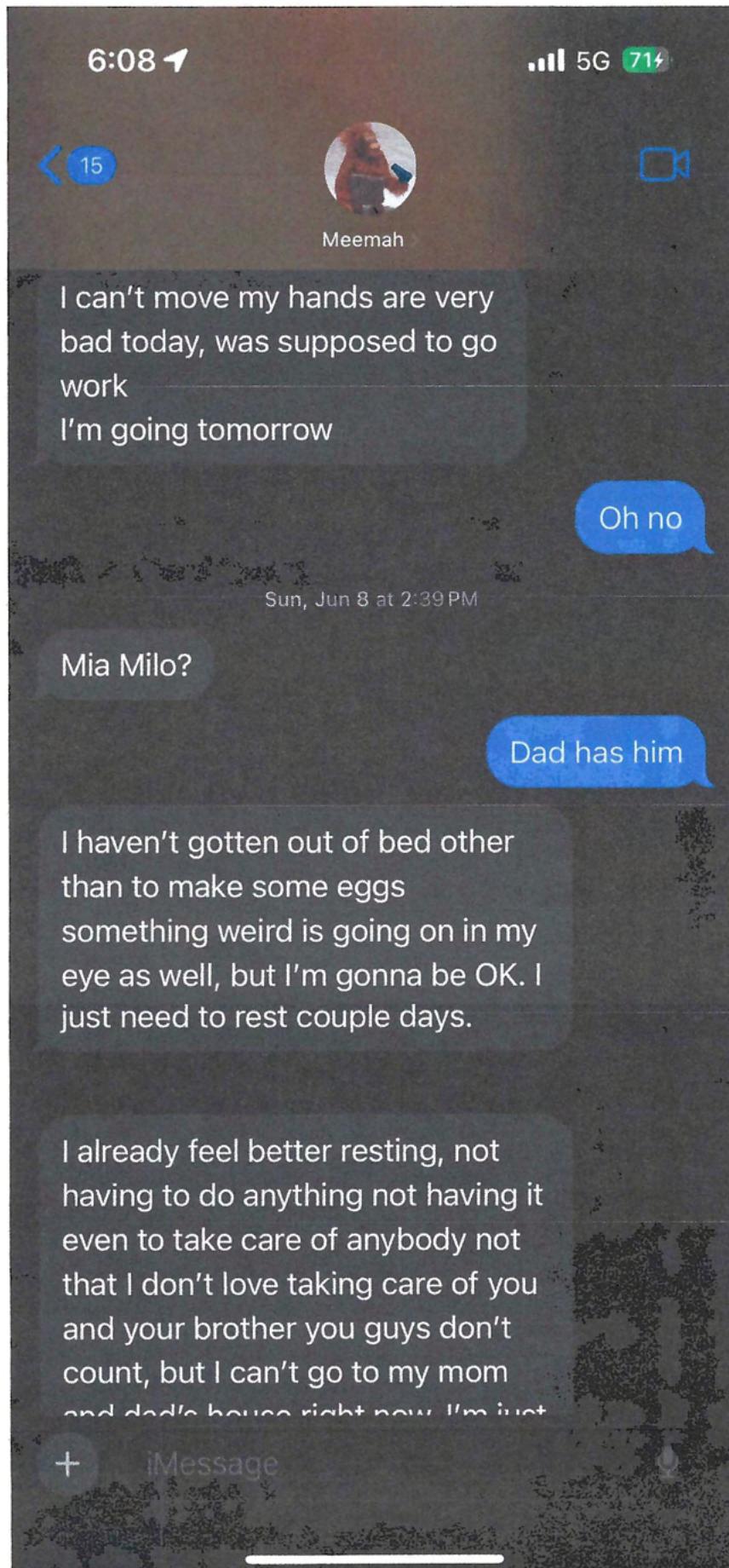


EXHIBIT A.1-A.5

COINCIDING TEXTS

BETWEEN MARGIE SAYEGH

AND NUHA SAYEGH

JUNE 8, 2025

You need to check please.

By the way, Ziad is making
lunch for uncle Abey be-
cause he's leaving your
dad went down there if you
wanna sneak to go see him

I got everything checked
they couldn't find anything
I told you remember I need
to go to an eastern doctor

What do you mean eastern
doctor?

I can't even hold my phone,

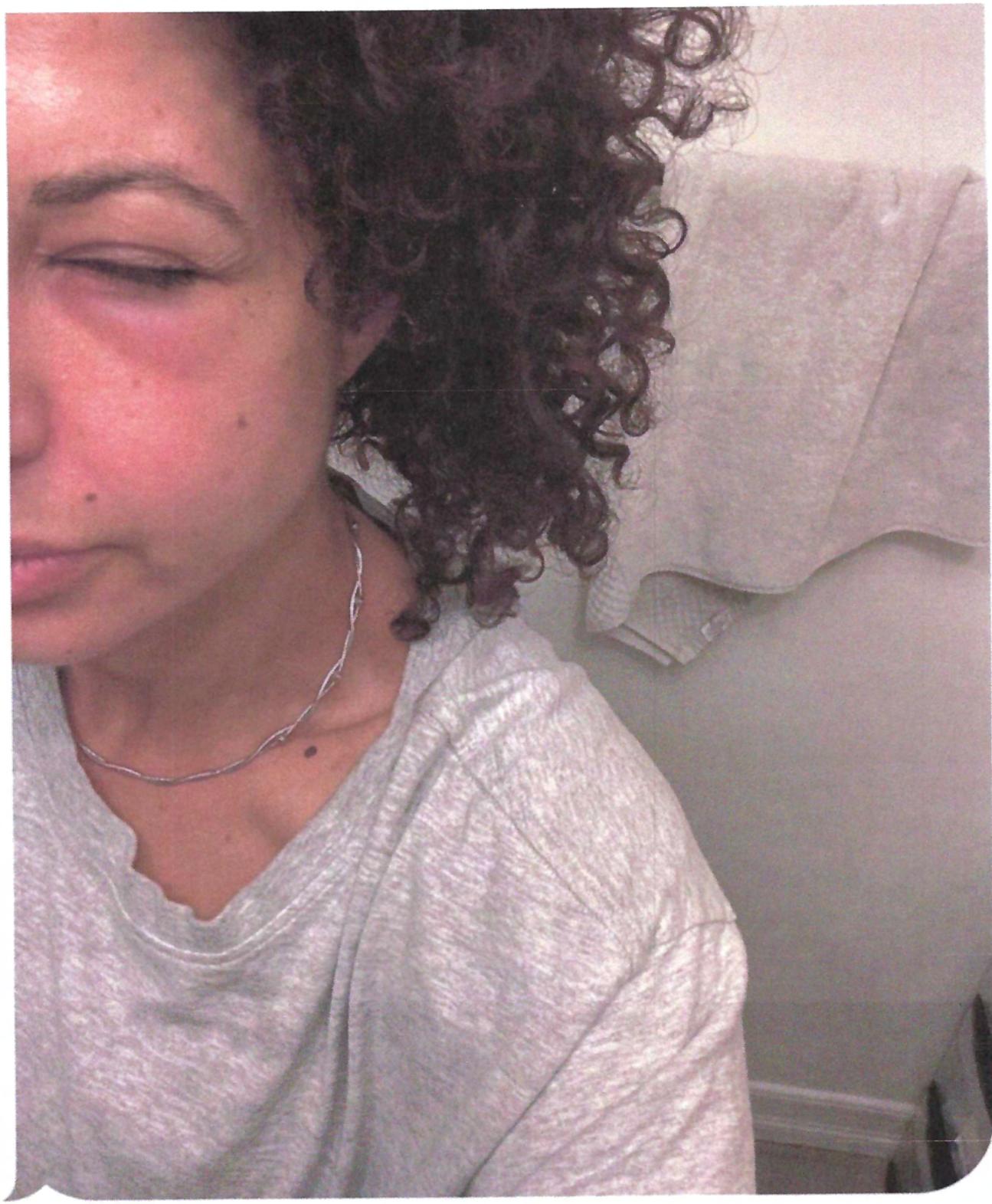
Sun, Jun 8 at 12:31PM

Good morning
I can't get my right eye.
Don't even open terrible re-
member yesterday I felt like
there was something weird
going on. There's like a
huge sack underneath my
eyeball.

Oh my God

Send me a picture

You need to get yourself
checked between your
swell up hand now your



Maybe alergies

Tina and Anthony leaving

I can't even hold my phone,
Momm I'm voice texting

I am sorry

This definitely is not RA. I
want you to know that.

Either an aftermath after
your treatment or some-
thing else, doctors are
overlooking

Western medicine eastern
medicine western they just
Band-Aid it give you pills
and send you home
Easter they do to the

to lay in bed all day

Are the kids having fun

Yes all good

I just put ac on cake got
picked up and put new
movie on Netflix called
straw Tyler Perry



EXHIBIT A.6-A.9

COINCIDING TEXTS

BETWEEN FAHED SAYEGH

AND NUHA SAYEGH

JUNE 8, 2025

JEFF LOGAN on Instagram: "My Friday night with my 3 year old son, You can't make this up man..."



instagram.com

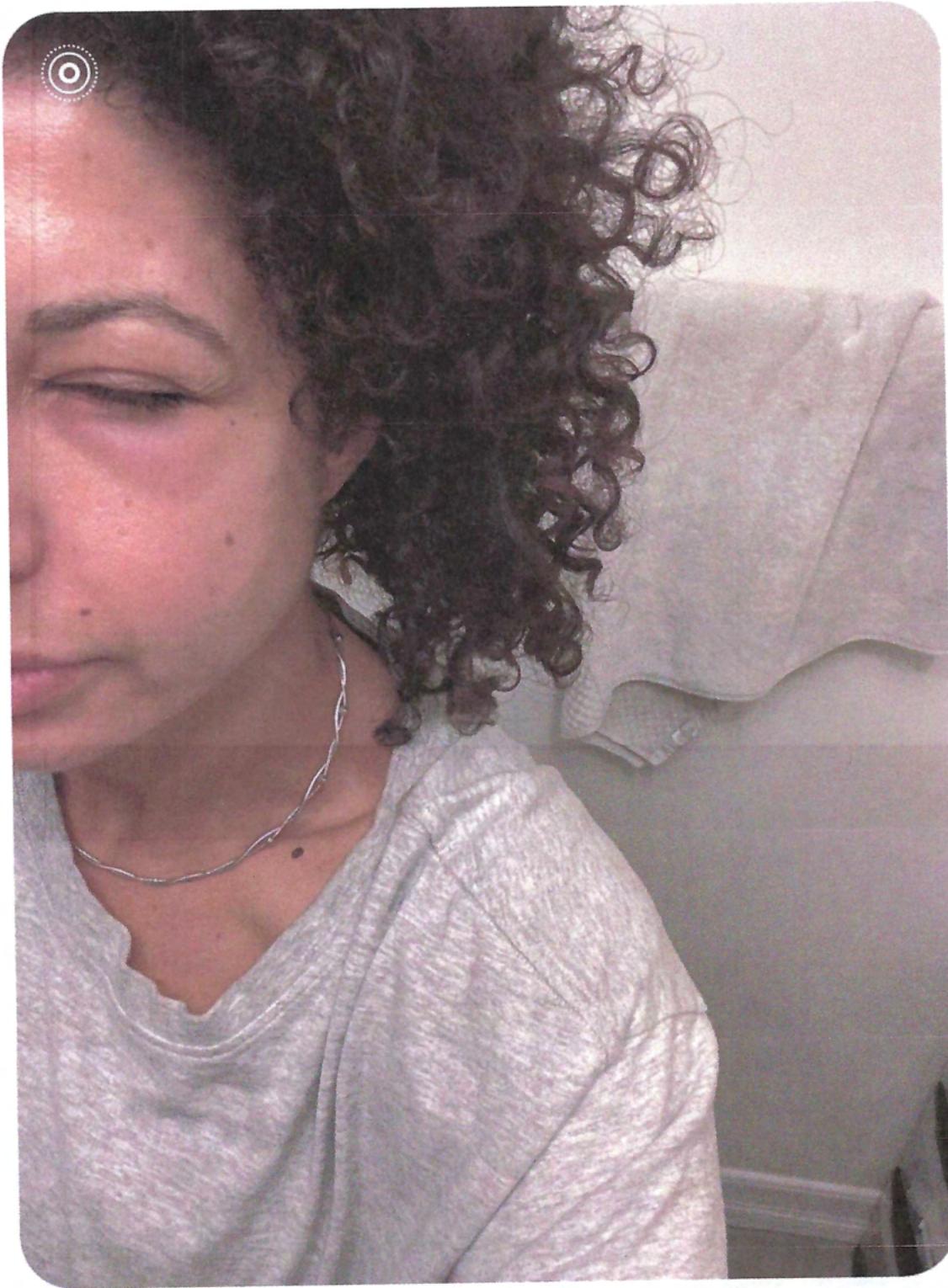
We're all going to my parents today
come
Over



his phone. I'm voice talking through.

Ouch

Sun, Jun 8 at 1:25 PM



To add to everything woke up my right
arm

Call me when you're on your way home. I gotta tell you about somebody at the wedding

Nothing urgent so literally just call me when you're by yourself in the car

Are you ok

Yeah I wanted to tell you who I'm pretty sure I know who's on crazy drugs like this guy was a nutcase

Sun, Jun 8 at 4:14 PM

What is the Wi-Fi password?

House

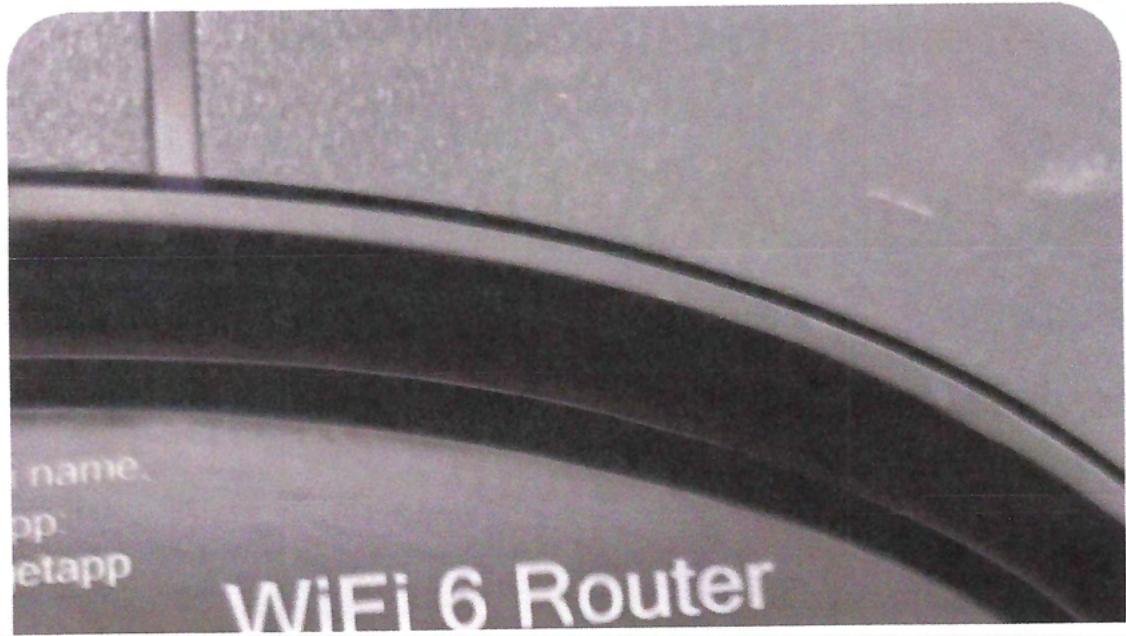


EXHIBIT B

NEWLY DISCOVERED TEXTS

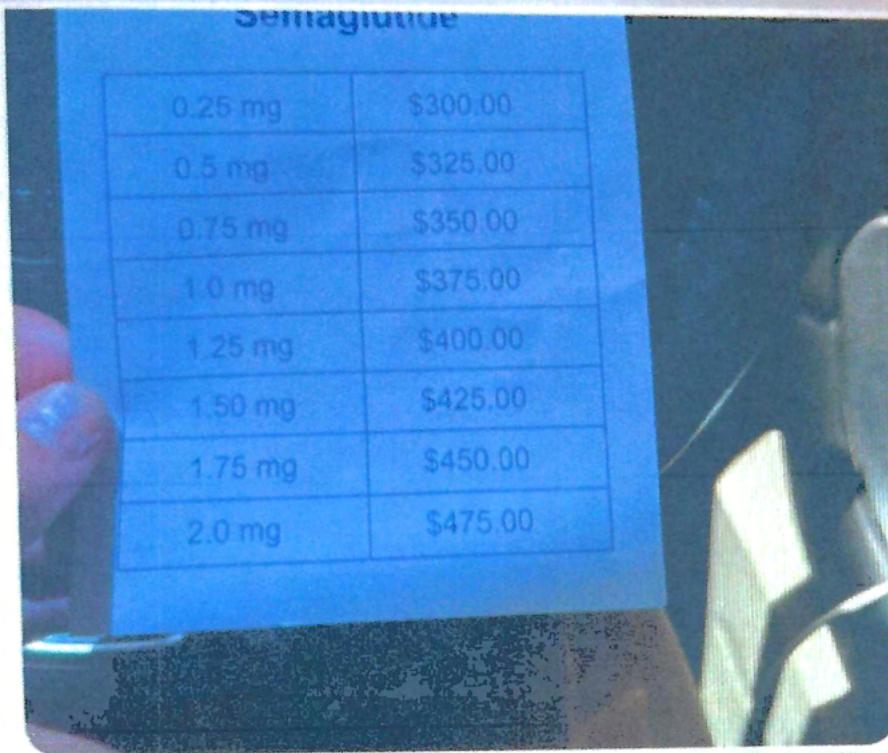
REGARDING

BOTOX/FILLERS/INJECTIONS

DR. INFORMATION

DISCOVERED 10/22/2025

To: Baba, Lenda, Queen, Nuha



The doctor I go to here in Old Town whoever I bring in not only do I get 50% off of this and Botox and fillers ext..... so does the person I bring in gets half off of all. Cash though



Caption (Page 4):

Second screenshot of the same thread (July 19, 2024). Price list image included. Petitioner repeats: "The doctor I go to here in Old Town.. I get 50% off of this and Botox and fillers... Cash though." A participant replies: "I'm gonna try to go get some more today or maybe I'll call them to see if they have any."

Exhibit B — July 19, 2024 Group Texts: Dr. James Kojian, M.D. (Botox/Fillers)

Case: Sayegh v. Sayegh | Submitted by Respondent: Fahed "Freddy" Sayegh
Relevance: Petitioner discusses obtaining Botox/filler treatments from Dr. James Kojian in Pasadena and plans to get more the same day. Offered to show a non-assault, cosmetic explanation for later appearance and to impeach credibility concerning the alleged events of August 26, 2025.

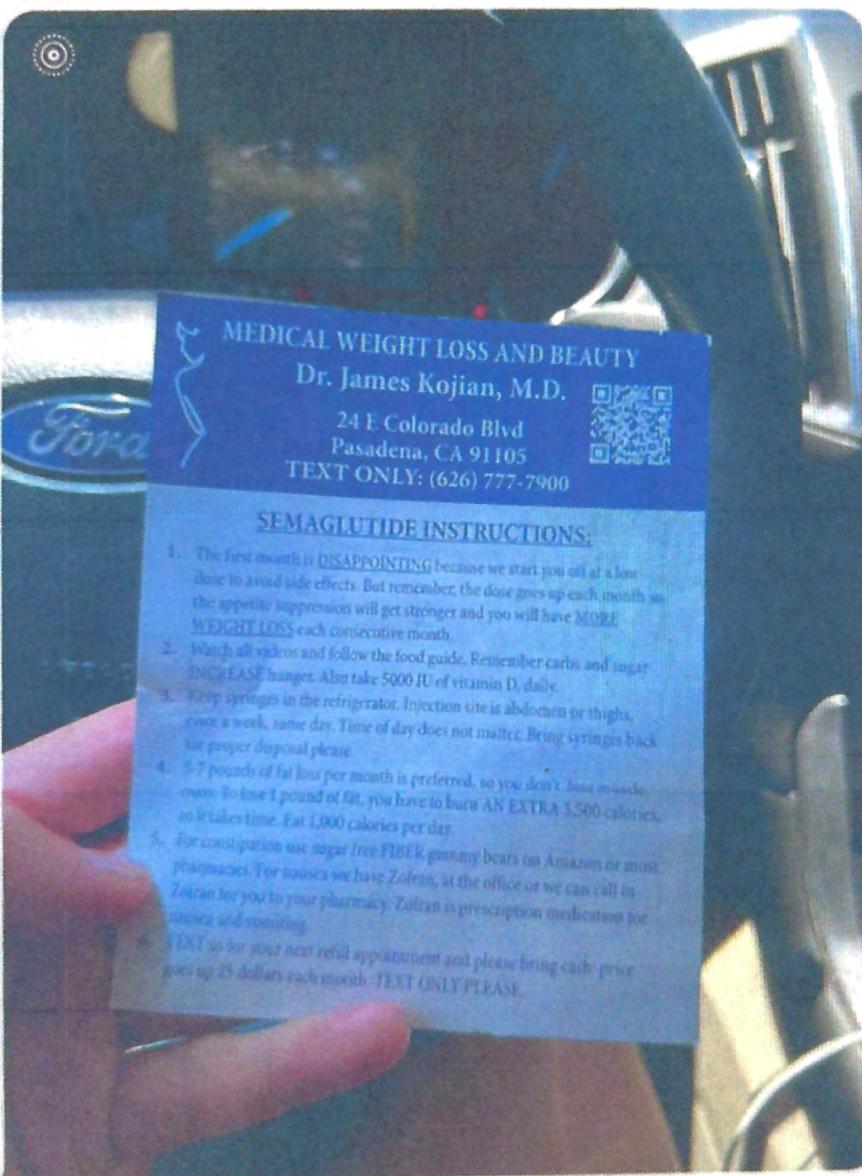
Authentication: To be established via device screenshots/metadata and testimony from a participant/recipient or custodian. See Evid. Code §§ 1400-1402; People v. Goldsmith (2014) 59 Cal.4th 258; People v. Valdez (2011) 201 Cal.App.4th 1429.

Prepared: 2025-10-25 17:43

To: Baba, Lenda, Queen, Nuha



The doctor I go to here in Old Town whoever I bring in not only do I get 50% off of this and Botox and fillers ext..... so does the person I bring in gets half off of all. Cash though



He's Jordanian, whatever filler or Botox you don't use he puts your name on saves for next time. Beautiful place he's in right by Tiffany's.

Jul 19, 2024, 3:04 PM

Queen

I'm gonna try to go get some more today or maybe I'll call them to see if they have any

Nuha Sayegh

Caption (Page 2):

Screenshot of group iMessage thread dated July 19, 2024. Petitioner: "The doctor I go to here in Old Town... I get 50% off of this and Botox and fillers... Cash though." Further message: "He's Jordanian, whatever filler or Botox you don't use he puts your name on saves for next time."

EXHIBIT C

TRIAL TRANSCRIPT REQUEST

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

CASE NAME: Sayegh v Sayegh

CASE NUMBER: 25PDRO1246

TRANSCRIPT REQUEST - CORRESPONDENCE LETTER

Date: 10/16/2025

Dear Sir or Madam:

The Court is in receipt of your request for transcript(s) in the above-referenced matter.

- The request has been forwarded to Court Reporter _____
for the date(s) of _____
- The request cannot be processed for the following reason:
- The request is lacking pertinent information. Please resubmit the request with the case name and number, the court location and department number, and the date(s) of the proceedings that you are requesting to be transcribed.
 - Pursuant to Government Code Section 69955(e), the stenographic notes have been destroyed.
- You may contact the Records, Exhibits, and Archives Unit to retrieve a copy of the transcript at: (213) 830-0198
- Other: According to our records the case number listed does not match our records, please resubmit your request with the correct information in order for it to be processed.

Prepared by: E.Soto, Deputy

TRANSCRIPT REQUEST CORRESPONDENCE LETTER

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

CASE NAME: Sayegh v Sayegh

CASE NUMBER: 25PDFL01441

TRANSCRIPT REQUEST - CORRESPONDENCE LETTER

Date: 10/20/2025

Dear Sir or Madam:

The Court is in receipt of your request for transcript(s) in the above-referenced matter.

- The request has been forwarded to Court Reporter _____
for the date(s) of _____
- The request cannot be processed for the following reason:
- The request is lacking pertinent information. Please resubmit the request with the case name and number, the court location and department number, and the date(s) of the proceedings that you are requesting to be transcribed.
 - Pursuant to Government Code Section 69955(e), the stenographic notes have been destroyed.
- You may contact the Records, Exhibits, and Archives Unit to retrieve a copy of the transcript at: (213) 830-0198
- Other: According to our records there was no court proceedings held for the date and case number listed, for this reason we are unable to process your request.

Prepared by: E.Soto, Deputy

TRANSCRIPT REQUEST CORRESPONDENCE LETTER



Freddy Sayegh <freddy@thefoxxfirm.com>

SAYEGH OCTOBER 15, 2025 HEARING TRANSCRIPT ESTIMATE

3 messages

Tosha Kopplin <toshakop@yahoo.com>

Thu, Oct 23, 2025 at 2:00 PM

To: "FREDDY@THEFOXXFIRM.COM" <FREDDY@thefoxxfirm.com>

Good afternoon,
The estimated cost on the above matter is as follows:

2-WEEK TURNAROUND	\$550
-------------------	-------

Just a note, I will be on vacation October 25, through November 3, 2025. If you are interested in purchasing the transcript, I need payment through Zelle (818-512-4762). Please indicate name of parties, date of hearing, and case number in the "memo." Upon receipt of payment when I return, I will provide an electronic copy within the two-week turnaround timeframe.

Thank you,

Tosha Townsend

Freddy Sayegh <Freddy@thefoxxfirm.com>

Thu, Oct 23, 2025 at 2:12 PM

To: Tosha Kopplin <toshakop@yahoo.com>

Transcript Order – DVRO Hearing (October 15, 2025) – Nuha Sayegh (Petitioner) v. Fahed Sayegh (Respondent)

2:07 

Confirmation



We're sending your money now. Tosha Townsend will get it in a few minutes.

\$550.00

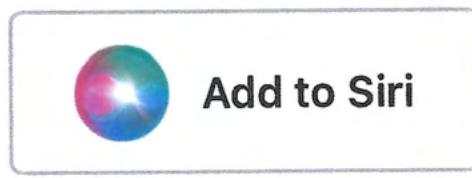


Tosha Townsend

Registered as TOSHA TOWNSEND

(818) 512-4762

Add a Siri shortcut, such as "Pay Tosha," to save time when sending money.



Dear Ms. Townsend,

Thank you for your message and for confirming your schedule and turnaround time.

Please prepare the transcript for the following matter:

Case Name: Nuha Sayegh (Petitioner) v. Fahed ("Freddy") Sayegh (Respondent)

LASC Case No.: 25PDRO1246

(r/w 25PDFL01441 [Dissolution – Lead]; r/w 25PDRO01260 [Related DV Matter])

Hearing Date: October 15, 2025

I have sent the \$550 payment via Zelle to 818-512-4762 and included the case name, date, and number in the memo line as requested.

Please confirm receipt at your convenience. I understand the electronic transcript will be delivered within the two-week turnaround following your return on November 3, 2025.

If possible, please ensure that the transcript includes the entire hearing, including all testimony, arguments, and the Court's final ruling.

Thank you again for your assistance and professionalism.

**Freddy Sayegh
THE ALTADENA COALITION
407 East Woodbury
Pasadena, California 91001
O/310-877-5033
F/310-895-1180
www.thealtadena.com**

[Quoted text hidden]

Tosha Kopplin <toshakop@yahoo.com>
To: Freddy Sayegh <freddy@thefoxxfirm.com>

Thu, Oct 23, 2025 at 2:17 PM

Received. Transcript will be delivered within 2 weeks AFTER November 3, 2025.

Thank you,

Tosha Townsend
[Quoted text hidden]

EXHIBIT D

HIPPA AUTHORIZATION

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: gglaw2004@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

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 [x] 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:

[x] 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 #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: gglaw2004@yahoo.com | Address: 206 S. Stimson Ave, La Puente, CA 91744

Purpose of disclosure (check all that apply):

[] Continuity of care [x] 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:

[x] 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.)