
EXHIBIT D

Declaration of Nuha Sayegh

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

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.

I. AUTHORIZATION TO DOCUMENT THE MEETING

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.

II. ADMISSION OF EXECUTOR STATUS

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.”**

III. EVIDENCE OF BAD FAITH ASSET CONVERSION

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.”**

IV. EVIDENCE OF SPOLIATION

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.

Nuha Sayegh
Declarant

END OF EXHIBIT D
