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6 Attorneys for Co-Trustee
INVENZ, INC.
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF RIVERSIDE**
10

11 In re the
12 DIA KENSHALO ABRAMS TRUST DATED
DECEMBER 16, 2016.
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14 _____
15 CLINTON ABRAMS, an individual; and
CRISARA ABRAMS, an individual,

16 Petitioners,

17 vs.

18 KEITH HARPER, an individual and as trustee;
19 DIANA FEDDER (aka DIANE FEDDER), an
individual and as trustee; and DOES 1 through
20 50, inclusive,

21 Respondents.
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Case No. PRIN2100297
Assigned to the Hon. Russell M. Velasquez
Department: PS3

**NOTICE OF ENTRY OF ORDER RE
STIPULATION AND STAY AWAY
ORDER**

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORDS:

NOTICE IS HEREBY GIVEN that the Petitioner and Co-Trustee Invenz, Inc.'s Stipulation and Stay Away Order has been granted by the Court. A copy of the said Stipulation and Stay Away Order is attached hereto as **Exhibit A.**

DATED: January 24, 2024

BUCHALTER
A Professional Corporation

By: /s/ Michael L. Wachtell
MICHAEL L. WACHTELL
GORDON C. STUART
Attorneys for Co-Trustee,
INVENZ, INC.

EXHIBIT A

1 BUCHALTER
2 A Professional Corporation
3 MICHAEL L. WACHTELL (SBN: 47218)
4 GORDON C. STUART (SBN: 294321)
5 1000 Wilshire Blvd., Suite 1500
6 Los Angeles, CA 90017
7 Email: gstuart@buchalter.com;
8 Attorneys for Co-Trustee, Invenz, Inc.

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JAN 23 2024

A. Vallejo Garcia

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

10 In re the
11 DIA KENSHALO ABRAMS TRUST
12 DATED DECEMBER 16, 2016

13 CLINTON ABRAMS, an individual; and
14 CRISARA ABRAMS, an individual;

15 Petitioners,

16 v.

17 KEITH HARPER, an individual and as trustee;
18 DIANA FEDDER (aka DIANE FEDDER), an
19 individual and as trustee; and DOES 1 through
20 50, inclusive,

21 Respondents.

Case No. PRIN2100297
Assigned to Honorable Russell M. Velasquez
Department: PS3

**STIPULATION AND
STAY AWAY ORDER**

21 This Stipulation concerns the Dia Kenshalo Abrams Trust, dated December 16, 2016 (the
22 "Trust"), and is made and entered into by Trustee Invenz, Inc., by its Chief Executive Officer
23 Richard Munro ("Mr. Munro"), on the one hand, and Keith Harper ("Harper"), on the other hand,
24 by and through their attorneys of record, who hereby stipulate and mutually agree as follows:

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RECITALS

WHEREAS, Mr. Munro is the sole acting trustee of the Trust, with exclusive authority to
manage all assets of the Trust, both tangible and intangible, including all financial accounts;

1 **WHEREAS**, the Trust assets include, *inter alia*, the real property and improvements
2 located at 58111 Bonita Vista Road, Mountain Center, CA 92561 (the “Bonita Vista Property”), as
3 well as the tangible personal property situated on and in the Bonita Vista Property, along with the
4 real property and improvements located at 28893 Bonita Vista Road, Mountain Center, CA 92561
5 (the “Sky High Property”), as well as the tangible personal property situated on and in the Sky High
6 Property, and the real property and improvements located at 36581 Tool Box Spring Road,
7 Mountain Center, CA 92561 (the “Tool Box Spring Property”), as well as the tangible personal
8 property situated on and in the Tool Box Spring Property (collectively, Bonita Vista Property, Sky
9 High Property, and Tool Box Spring Property are referred to herein as the “Trust Properties”);

10 **WHEREAS**, on November 22, 2023, Mr. Munro provided Harper with written notice to
11 vacate the Bonita Vista Property within sixty (60) days and to not remove any personal property
12 from on or within the Bonita Vista Property, other than personal property purchased by and
13 personally belonging to Harper, which he can prove is his and that he paid for such personal
14 property from his own personal funds;

15 **WHEREAS**, Mr. Munro has received credible reports that Harper has improperly removed
16 personal property from the Bonita Vista Property, and as such, is considering taking appropriate
17 legal action to enjoin Harper from any further access to the Bonita Vista Property;

18 **WHEREAS**, in lieu of Mr. Munro taking such legal action, Harper has agreed to voluntarily
19 vacate and forever stay away from the Bonita Vista Property, and all the other Trust Properties, to
20 cease and desist from removing any personal property from on or in all of the Trust Properties
21 henceforth, to immediately return to Mr. Munro any personal property and/or other assets of the
22 Trust that he removed from the Bonita Vista Property any of the other Trust Properties, and to stay
23 at least one mile away from all of the Trust Properties at all future dates and times. As to the vintage
24 army jeep, exercise/gymnasium equipment, and a red Suzuki 4 Wheel ATV already removed by
25 Mr. Harper, the vintage army jeep and exercise/gymnasium equipment shall be returned by January
26 28, 2024. Mr. Harper may present evidence to Mr. Munro by January 24, 2024, of his ownership
27 of those particular items, and, if satisfactory in Mr. Munro’s sole discretion, Mr. Harper may retain
28 those particular items. Absent such satisfactory proof, he must return those particular items by

1 January 28, 2024, and shall have thirty (30) days to offer proof of ownership to Mr. Munro. All
2 other items that have already been removed from the Trust Properties are to be returned by January
3 28, 2024. Mr. Harper shall give to his counsel on record a list of the items of personal property for
4 which he claims to be his no later than January 24, 2024, which shall be furnished to counsel for
5 Mr. Munro. Any items in dispute over ownership shall be held in trust until such time that the
6 parties can come to an agreement and/or valid proof of ownership can be provided by either party.
7 During such time as the items remain in dispute, the Trustee shall not liquidate or otherwise dispose
8 of those items pending resolution amongst the parties or a court order.

9 **NOW, WHEREFORE, IT IS HEREBY STIPULATED:**

10 Pursuant to California Civil Code section 527, et seq., Harper agrees to voluntarily and
11 forever vacate by no later than January 28, 2024, and stay away from the Bonita Vista Property and
12 to not return to the Bonita Vista Property, or any of the other Trust Properties, absent prior written
13 consent by Mr. Munro, made in writing at least forty-eight (48) hours in advance. Harper further
14 agrees to cease and desist the removal of any personal property from on or in the Bonita Vista
15 Property, or any of the Trust Properties, absent prior written consent from Mr. Munro and to
16 immediately return and restore the Trust personal property and/or any other assets of the Trust
17 which Harper has removed from any of the Trust Properties.

18 As to the vintage army jeep, exercise/gymnasium equipment, and a red Suzuki 4 Wheel
19 ATV already removed by Mr. Harper, the vintage army jeep and exercise/gymnasium equipment
20 shall be returned by January 28, 2024. Mr. Harper may present evidence to Mr. Munro by January
21 24, 2024, of his ownership of those particular items, and, if satisfactory in Mr. Munro's sole
22 discretion, Mr. Harper may retain those particular items. Absent such satisfactory proof, he must
23 return those particular items by January 28, 2024, and shall have thirty (30) days to offer proof of
24 ownership to Mr. Munro. All other items that have already been removed from the Trust Properties
25 are to be returned by January 28, 2024. Mr. Harper shall give to his counsel on record a list of the
26 items of personal property for which he claims to be his no later than January 24, 2024, which shall
27 be furnished to counsel for Mr. Munro. Any items in dispute over ownership shall be held in trust
28 until such time that the parties can come to an agreement and/or valid proof of ownership can be

1 provided by either party. During such time as the items remain in dispute, the Trustee shall not
2 liquidate or otherwise dispose of those items pending resolution amongst the parties or a court
3 order.

4 **IT IS SO STIPULATED.**

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6 DATED: January 17, 2024

BUCHALTER
A Professional Corporation

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8
9 By: 

MICHAEL L. WACHTELL
GORDON C. STUART
Attorneys for Co-Trustee Invenz, Inc.

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12 DATED: January 19, 2024

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14 By: 

KEITH HARPER (Jan 19, 2024 17:29 PST)

KEITH HARPER

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25 [Proposed] Order on following page.
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ORDER

In consideration of the Stipulation of the Parties, and FOR GOOD CAUSE APPEARING,
IT IS HEREBY ORDERED:

Pursuant to California Civil Code section 527, et seq., Harper shall voluntarily and forever vacate by no later than January 28, 2024, and stay away from the Bonita Vista Property and not return to the Bonita Vista Property, or any of the Trust Properties, and to stay at least one mile away from all of the Trust Properties at all future dates and times, absent prior written consent by Mr. Munro, made in writing at least forty-eight (48) hours in advance. Harper shall cease and desist the removal of any personal property from on or in the Bonita Vista Property, or any of the other Trust Properties, absent prior written consent from Mr. Munro and shall immediately return and restore the Trust personal property and/or any other assets of the Trust which Harper has removed from any of the Trust Properties.

As to the vintage army jeep, exercise/gymnasium equipment, and a red Suzuki 4 Wheel ATV already removed by Mr. Harper, the vintage army jeep and exercise/gymnasium equipment shall be returned by January 28, 2024. Mr. Harper may present evidence to Mr. Munro by January 24, 2024, of his ownership of those particular items, and, if satisfactory in Mr. Munro's sole discretion, Mr. Harper may retain those particular items. Absent such satisfactory proof, he must return those particular items by January 28, 2024, and shall have thirty (30) days to offer proof of ownership to Mr. Munro. All other items that have already been removed from the Trust Properties are to be returned by January 28, 2024. Mr. Harper shall give to his counsel on record a list of the items of personal property for which he claims to be his no later than January 24, 2024, which shall be furnished to counsel for Mr. Munro. Any items in dispute over ownership shall be held in trust until such time that the parties can come to an agreement and/or valid proof of ownership can be provided by either party. During such time as the items remain in dispute, the Trustee shall not liquidate or otherwise dispose of those items pending resolution amongst the parties or a court order.

DATED JAN. 23, 2024


RUSSELL M. VELASQUEZ
JUDGE OF THE SUPERIOR COURT DP 53

1 **PROOF OF SERVICE**

2 *In re the Dia Kenshalo Abrams Trust Dated December 16, 2016*
3 Case No. PRIN2100297

4 I am employed in the County of Los Angeles , State of California. I am over the age of 18
5 and not a party to the within action. My business address is at BUCHALTER, A Professional
6 Corporation, 1000 Wilshire Boulevard, Suite 1500, Los Angeles, CA 90017-2457.

7 On the date set forth below, I served the foregoing document described as

8 **STIPULATION AND [PROPOSED] STAY AWAY ORDER** on all other parties and/or their
9 attorney(s) of record as follows:

10 Matthew R. Owens
11 Sheppard, Mullin, Richter & Hampton LLP
12 12275 El Camino Real, Suite 100
13 San Diego, CA 92130

mowens@sheppardmullin.com
*Attorneys for Crisara Abrams and Clinton
Abrams*

14 Maryann Briseno
15 The Briseno Law Firm
16 32395 Clinton Keith Rd., Ste. A-206
17 Wildomar, CA 2595

maryann@thebrisenofirm.com
Attorneys for Co-Trustee Keith Harper

18 **BY MAIL** I am readily familiar with the business' practice for collection and
19 processing of correspondence for mailing with the United States Postal Service. The address(es)
20 shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in
21 the United States Postal Service at Buchalter in Los Angeles, California on **January 23, 2024**.
22 The envelope was sealed and placed for collection and mailing with first-class prepaid postage on
23 this date following ordinary business practices.

24 **BY EMAIL** On **January 23, 2024**, I personally served from my electronic address
25 tvallejo@buchalter.com, in "PDF" format, the document(s) described above, with attachments, to
26 the individuals stated above to their known email/electronic addresses as shown above. The
27 transmission was reported as complete and without error. (CRC § 2.251, et seq.)

28 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct to the best of my knowledge. Executed on **January 23, 2024**, at Los
Angeles, California.

Tatiana Vallejo

/s/ Tatiana Vallejo

(Signature)

BN 80598073V1

1 **PROOF OF SERVICE**

2 *In re the Dia Kenshalo Abrams Trust Dated December 16, 2016*
3 *Riverside County Sup. Ct. Case No. PRIN2100297*

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
5 and not a party to the within action. My business address is at BUCHALTER, A Professional
6 Corporation, 1000 Wilshire Boulevard, Suite 1500, Los Angeles, CA 90017-2457.

7 On the date set forth below, I served the foregoing document described as **NOTICE OF**
8 **ENTRY OF ORDER RE STIPULATION AND STAY AWAY ORDER** on all other parties
9 and/or their attorney(s) of record as follows:

10 Matthew R. Owens
11 **SHEPPARD MULLIN RICHTER & HAMPTON LLP**
12 12275 El Camino Real, Suite 100
13 San Diego, CA 92130
14 Email: mowens@sheppardmullin.com

Attorneys for Crisara Abrams and Clinton Abrams

Attorneys for Co-Trustee Keith Harper

15 Maryann Briseno
16 **THE BRISENO LAW FIRM**
17 32395 Clinton Keith Road, Suite A-206
18 Wildomar, CA 2595
19 Email: maryann@thebrisenofirm.com

20 **BY MAIL:** I am readily familiar with the business' practice for collection and
21 processing of correspondence for mailing with the United States Postal Service. The address(es)
22 shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in
23 the United States Postal Service at Buchalter in Los Angeles, California on **January 24, 2024**.
24 The envelope was sealed and placed for collection and mailing with first-class prepaid postage
25 on this date following ordinary business practices.

26 **BY EMAIL:** On **January 24, 2024**, I personally served from my electronic address
27 ehernandez@buchalter.com, in "PDF" format, the document(s) described above, with
28 attachments, to the individuals stated above to their known email/electronic addresses as shown
above. The transmission was reported as complete and without error. (CRC § 2.251, et seq.)

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct to the best of my knowledge. Executed on **January 24, 2024**, at Los
Angeles, California.

Elizabeth Hernandez

/s/ Elizabeth Hernandez

(Signature)