

1 KING LAW FIRM ATTORNEYS AT LAW, INC.  
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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**05/25/2022** at 10:40:00 AM  
Clerk of the Superior Court  
By Casey Morales, Deputy Clerk

6 Attorney for Petitioner, Aaron Babbitt

7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SAN DIEGO – CENTRAL COURTHOUSE**

10 In re:  
11  
12 Estate of Ashli Elizabeth Babbitt AKA Ashli  
Elizabeth McEntee,  
13  
14 Decedent.

Case No.: 37-2021-00017010-PR-LS-CTL  
**DECLARATION OF ATTORNEY  
RACHEL KING IN SUPPORT OF THE  
EX PARTE APPLICATION AND  
PETITION FOR INSTRUCTION**

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16  
17 I, Rachel King, declare as follows:

18 1. I am an attorney at law licensed to practice before the Courts of the State of California.

19 I have personal knowledge of the matters set forth herein and if called as a witness in a court of law,  
20 I could and would competently testify to the same.

21 2. I am the attorney of record in this matter for Petitioner Aaron Babbitt.

22 3. Petitioner sent my office the April 26, 2022, letter attached hereto as Exhibit A and  
23 incorporated herein as reference, in which he indicates that if Petitioner does not retain counsel by  
24 May 30, 2022, in regard to the wrongful death civil litigation, he would need be refunding the crowd-  
25 funding money back to the donors.  
26  
27  
28

1 4. Petitioner has indicated that Judicial Watch is currently reviewing the case to  
2 determine if they will be taking it on. However, they are a 501(c)3 and therefore they do not accept  
3 money for services.

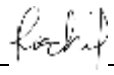
4 5. Petitioner is still in the process of retaining new counsel and his counsel of choice is  
5 unable to retrieve the funds.

6 6. As refunding the donated funds back to the donors would be a significant waste to the  
7 estate as the funds are to be used in the hopeful positive outcome of the wrongful death litigation,  
8 Petitioner respectfully requests instruction from the Court and an order to retrieve the Donated Funds  
9 on behalf of the Estate to secure the Donated Funds into a blocked account in which the Estate would  
10 use such Funds for the sole Purpose of the wrongful death suit pending court approval.

11  
12 I certify under penalty of perjury under the laws of the State of California that the foregoing  
13 is true and correct.

14  
15 **KING LAW FIRM ATTORNEYS AT LAW, INC.**

16  
17 DATED: 05 / 25 / 2022

18 

19 Rachel King  
20 Attorney for Petitioner, Aaron Babbitt

**EXHIBIT “A”**

**EXHIBIT “A”**

TERRELL N. ROBERTS, III  
(MD, D.C., VA)  
DOUGLAS J. WOOD  
(MD, D.C.)  
CHRISTOPHER A. GRIFFITHS  
(MD, D.C.)

**ROBERTS & WOOD**  
ATTORNEYS AT LAW  
6801 KENILWORTH AVENUE  
BERKSHIRE BUILDING, SUITE 202  
RIVERDALE, MARYLAND 20737

(301) 699-0764  
(301) 699-8706 FAX

April 26, 2022

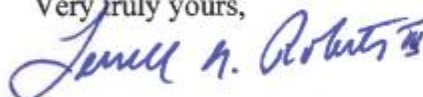
**Via Email**

Mr. Aaron Babbitt  
4849 Cape May Avenue  
San Diego, California 92107

Dear Mr. Babbitt:

I am in receipt of your email yesterday informing me that you are waiting to hear back from lawyers who may take the case. I understand that a lawyer needs time to review a case. However, we are at a point where enough time has passed for that to have occurred. Any lawyer who looks at this case already has the benefit of the video tapes of the shooting, the documentation of the ambulance, hospital and autopsy, our investigative notes, the investigation conducted by the Metropolitan Police Department, and a work-up of the economic and non-economic damages. I notified you of my withdrawal on February 25, 2022, and I provided you with copies of the file on March 23, 2022. In short, there has been more than enough time for a lawyer to decide whether the case has sufficient merit. Therefore, if you have not retained a lawyer by May 30, 2022, I will take for granted that a lawsuit is not going to be filed, and I will refund the crowd-funding money back to the donors. Thank you.

Very truly yours,



Terrell N. Roberts, III

**SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF SAN DIEGO  
CENTRAL**

**MINUTE ORDER**

DATE: 06/03/2022

TIME: 08:45:00 AM

DEPT: 503

JUDICIAL OFFICER PRESIDING: Julia C. Kelety

CLERK: Hannah Snyder

REPORTER/ERM: Not Reported

BAILIFF/COURT ATTENDANT:

CASE NO: **37-2021-00017010-PR-LS-CTL** CASE INIT.DATE: 04/16/2021

CASE TITLE: **Estate of Ashli Elizabeth Babbitt AKA Ashli Elizabeth McEntee [IMAGED]**

CASE CATEGORY: Probate

CASE TYPE: Letters Of Special Administration

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**EVENT TYPE:** Ex Parte

MOVING PARTY: Aaron Babbitt

CAUSAL DOCUMENT/DATE FILED: Ex Parte Application - Other and Supporting Documents Ex Parte Notice of Application and Ex Parte Application to Petition for Instructions, 05/25/2022

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**APPEARANCES**

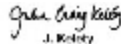
Attorney Rachel King appearing via remote video on behalf of Petitioner, Aaron Babbitt, present telephonically.

Attorney Terrell Roberts, III, appearing via remote video.

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ROA #48 - Ex Parte Notice of Application and Ex Parte Application and Petition for Instruction filed on 05/25/2022 is denied without prejudice.

IT IS SO ORDERED.

  
J. Kelety

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Judge Julia C. Kelety