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5 Attorneys for Defendants
HEAL THE WORLD FOUNDATION and
6 UNITED FLEET

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11
12 JOHN G. BRANCA, Special
Administrator of the Estate of Michael
13 J. Jackson; JOHN MCCLAIN, Special
Administrator of the Estate of
14 Michael J. Jackson; TRIUMPH
INTERNATIONAL, INC., a California
15 corporation,

16 Plaintiffs,

17 vs.

18 HEAL THE WORLD FOUNDATION,
a California corporation; UNITED
19 FLEET, a California corporation; and
DOES 1-10, inclusive,

20 Defendants.
21

CASE NO: CV-09-07084 DMG [PLAx]
Honorable Dolly M. Gee
Courtroom 7

**DECLARATION OF STEVEN C.
SMITH IN SUPPORT OF THE
REQUEST FOR APPROVAL OF
SUBSTITUTION OF ATTORNEY**

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23 To the Honorable Court and all interested parties:

24 The following declaration of Steven C. Smith is submitted in support of the
25 Request for Approval of Substitution of Attorney being filed concurrently herewith.
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28

Smith | Campbell | Clifford | Kearney | Gore

Smith | Campbell | Clifford | Kearney | Gore

1 1. I am an attorney at law licensed to practice before the United States
2 District Court, Central District of California.

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4 2. I am a partner at Smith Campbell Clifford Kearney Gore. I have
5 personal knowledge of the facts hereinafter stated, and if called as a witness, I could
6 and would competently testify to the facts contained herein.

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8 3. I have been retained by Heal the World Foundation, a California
9 corporation and United Fleet, a California corporation (hereinafter "Defendants") as
10 of August 27, 2011 to represent both in the above captioned case bearing Case No.
11 CV-09-07084 DMG (PLAx) in place of the current attorney of record Scott Barbag.
12

13 4. I am informed by Melissa Johnson, President of Heal the World
14 Foundation and United Fleet, that neither corporation desires to be further
15 represented in the case by Scott Barbag.
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17 5. I have read Scott Barbag's declaration in support of Defendants'
18 Motion for Substitution of Attorney. As Mr. Barbag indicated, he is being replaced
19 as "attorney of record" pursuant to the direction of the Defendants. The Defendants
20 have terminated the services of Mr. Barbag as their attorney.
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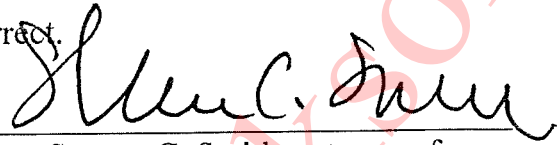
22 6. The Defendants have been advised that each lacks authority to
23 represent itself before this honourable court. Accordingly, the Defendants require
24 the attendant substitution of attorney to continue having assistance of counsel and
25 appropriate representation before this Court.
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28 7. I have accepted this case with the intention of remaining as counsel to

1 the Defendants until all proceedings before this Court are concluded or stayed due to
2 the filing of an appeal.

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4 I swear, under penalty of perjury, under the laws of the United States of
5 America that the foregoing is true and correct.

6 Dated: August 29, 2011



7 Steven C. Smith, attorney for
8 Defendants

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Smith | Campbell | Clifford | Kearney | Gore

PROOF OF SERVICE

Branca et al. vs. Heal the World Foundation, et al.

I declare that I am employed in the City of Santa Ana, County of Orange, State of California. I am over the age of eighteen years and not a party to the within action; my business address is: 1800 North Broadway, Suite 200, Santa Ana, California 92706

On August 29, 2011, I served the foregoing document(s):

DECLARATION OF STEVEN C. SMITH IN SUPPORT OF THE REQUEST FOR APPROVAL OF SUBSTITUTION OF ATTORNEY

on all interested parties in this action by placing [] the original [X] a true copy thereof, enclosed in a sealed envelope with postage pre-paid, addressed as follows:

Vincent H. Chieffo, State Bar No. 49069 Nina D. Boyajian, State Bar No. 246415 GREENBERG TRAUERIG, LLP 2450 Colorado Avenue, Suite 400E Santa Monica, CA 90404-5524 Phone: (310) 586-7700 Fax: (310) 586-7800 ChieffoV@gtlaw.com BoyajianN@gtlaw.com	Attorneys for Plaintiffs John G. Branca and John McClain, Special Administrators of the Estate of Michael J. Jackson, Triumph International, Inc.
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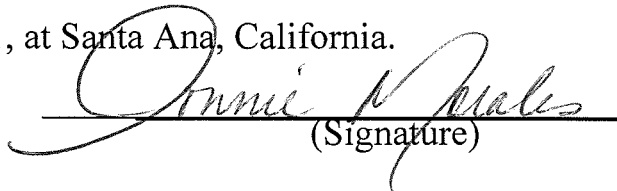
[X] By ELECTRONIC FILE TRANSFER TO ECF FILE & SERVE:

By transmitting a true copy of the document(s) listed above for service on all parties in this case pursuant to applicable statutes, local rules and/or order of the Court.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on August 29, 2011, at Santa Ana, California.

CONNIE MORALES
(Print Name)



(Signature)

Smith | Campbell | Clifford | Kearney | Gore