

1 Jeffrey Lewis (Bar No. 183934)
2 Kyla Dayton (Bar No. 346221)
3 **JEFF LEWIS LAW, APC**
4 827 Deep Valley Drive, Suite 209
5 Rolling Hills Estates, CA 90274
6 Tel. (310) 935-4001
7 Fax. (310) 872-5389
8 E-Mail: Jeff@JeffLewisLaw.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
2/28/2024 5:39 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By V. Sino-Cruz, Deputy Clerk

Attorneys for Defendant
FAITH BALLIN

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 MELISSA BACELAR, et al.,

12 Plaintiffs,

13 vs.

14 KIM SILL, et al.,

15 Defendants.

) Case No.: 24STCV01638

) **DECLARATION OF FAITH**
) **IN SUPPORT OF MOTION F**
) **UNDERTAKING**

) (Assigned for all purposes to
) Hon. Michael P. Linfield, Dept. 34)

) RES ID: 853713800084

Date: March 28, 2024
Time: 8:30 a.m.
Department: 34

Case Filed: January 22, 2024
Trial Date: None Set

23 I, Faith [REDACTED], declare as follows:

24 1. I am a defendant herein.

25 2. I have personal knowledge of the truth and accuracy of the facts set

26 forth herein, and if called upon as a witness, I could competently testify thereto. I do
27 not intend to waive the attorney-client privilege or work product doctrine by making
28 any statement herein.

DECLARATION



Jeff Lewis Law, APC
827 Deep Valley Drive, Suite 209
Rolling Hills Estates, CA 90274

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3. I have reviewed the complaint and am familiar with the allegations made against me.

4. I do not own or control the two websites, thetruthaboutwagmorpets.com or https://shelterhopepetshop.org, nor do I own or control the Instagram accounts, @thetruthaboutwagmorpets.com or @shelterhope_petshop described in the complaint.


5. I did not contact a 13-year-old Instagram social media influencer about Plaintiffs. I did not speak with the minor about Plaintiffs. I did not encourage that minor to make posts about Plaintiffs.


6. It is difficult to understand what exactly I am being accused of in this lawsuit because there are no dates or quotes, but based on the allegations, I do not believe I am responsible for what is alleged in terms of hacking accounts, "threats" or "cyber bullying."

7. I am very concerned about Plaintiffs' mistreatment of animals and wish to preserve the right to speak out about Plaintiffs. The pending lawsuit seeks to chill my free speech rights.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed this 27th day of February 2024, at Issaquah, Washington.


by eSIL (Feb 27, 2024 13:52 PST)

Faith 



PROOF OF SERVICE

Bacelar, et al. v. Kim Sill, et al.
Los Angeles County Superior Court Case No.: 24STCV01638

I, Renee Miramontes, declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the within action; my business address is 827 Deep Valley Drive, Suite 209, Rolling Hills Estates, CA 90274.

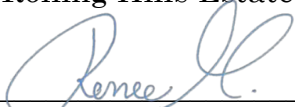
On **February 28, 2024**, I served the foregoing: **DECLARATION OF FAITH BALLIN IN SUPPORT OF MOTION FOR UNDERTAKING** on the interested parties in this action by placing the original a true copy thereof, enclosed in a sealed envelope with postage pre-paid, addressed as follows:

**** See Attached Service List ****

BY ELECTRONIC SERVICE. I served the foregoing document(s) on interested parties by using the electronic filing service ACE ATTORNEY SERVICE to serve and file documents electronically as mandated by the Los Angeles County Superior Court. The documents were electronically transmitted to the e-mail addresses of the persons set forth the above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **February 28, 2024**, in Rolling Hills Estates, California.



Renee Miramontes

Jeff Lewis Law, APC
827 Deep Valley Drive, Suite 209
Rolling Hills Estates, CA 90274



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SERVICE LIST

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Bacelar, et al. v. Kim Sill, et al.

Los Angeles County Superior Court Case No.: 24STCV01638

LEONARD, DICKER SCHREIBER LLP
10940 Wilshire Blvd., Suite 2100
Los Angeles, CA 90024-3963

Steven A. Schuman, Esq.
Email: sschuman@ldslaw.com

Attorneys for Plaintiffs:

Melissa Bacelar

Wagmor Pets

**Wylder's Holistic Pet Center
dba The Wagmor**

Jeff Lewis Law, APC
827 Deep Valley Drive, Suite 209
Rolling Hills Estates, CA 90274

