

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Attorneys for Petitioner, [REDACTED]

CCP
[REDACTED]
[REDACTED]
[REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, NORTH DISTRICT**

Estate of: [REDACTED]
[REDACTED]
[REDACTED]
Deceased.

**FOURTH SUPPLEMENT TO PETITION
FOR PROBATE OF WILL AND FOR
LETTERS OF ADMINISTRATION WITH
WILL ANNEXED**

DATE: [REDACTED]
TIME: 8:30 a.m.
DEPT.: A12

Petitioner, [REDACTED], hereby supplements his Petition for Probate of Will and for Letters of Administration with Will Annexed for the fourth time as follows:

1. Attached hereto as **EXHIBIT 1** and incorporated herein by this reference is a memorandum dated January 5, 2006, by Mary Ritch, a paralegal at [REDACTED] who is also a genealogist. Ms. Ritch has engaged in genealogy since 2001, i.e. for about 5 years.

As indicated in the memorandum, Ms. Ritch has completed her search of the decedent's maternal living heirs. Ms. Ritch was able to locate 19 additional living heirs on the decedent's maternal side of the family, 14 of which are first cousins once removed and 4 of which are first cousins twice removed.

1 2. Attached hereto as **EXHIBIT 2** and incorporated herein by this reference is the
2 updated family tree of the decedent's **MATERNAL** side of the family based on the information
3 ascertained by Ms. Ritch. Petitioner's attorney's office, [REDACTED], prepared this family
4 tree based on information from Ms. Ritch's genealogy report dated January 5, 2006.

5 3. Accordingly, petitioner, as special administrator for the sole purpose of locating living
6 heirs of the decedent, has ascertained that the decedent has a total of 25 living heirs -- six on the
7 paternal side of the family ([REDACTED]
8 [REDACTED]) and 19 on the maternal side of the family ([REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]).

13 4. Unfortunately, we were unable to ascertain the addresses of four (4) of the living
14 relatives on the maternal side of the decedent's family, to wit: [REDACTED]n,
15 first cousins once removed, and [REDACTED] and [REDACTED] first cousins twice
16 removed. Several telephone messages were left with close relatives of these four heirs asking that
17 said heirs contact our office; however, no contact has been made by these individuals. Obviously,
18 they are not interested in ascertaining information or details about an unknown relative's estate.

19 5. Accordingly, 21 of the 25 living heirs have been given sufficient notice of these
20 probate proceedings. (See "Sixth Continuance" Notice of Petition to Administer Estate filed
21 herein on December 15, 2005).

22 6. It is clear from the foregoing that the Petitioner has more than complied with the due
23 process requirements of using 'reasonably diligent efforts' to locate the interested persons, as set
24 forth in *Tulsa Professional Collection Services, Inc. v. Pope* (1988) 485 US 478 and *Mullane v.*
25 *Central Hanover Bank & Trust Co.* (1950) 339 US 306. *Tulsa* and *Mullane* do not require
26 "impracticable and extended searches". Petitioner has fully complied with all legal requirements
27
28

1 for admission of decedent's will to probate and his appointment as Administrator with Will
2 Annexed.

3 7. Petitioner requests at this time that the Court proceed with appointing him
4 administrator with will annexed of the decedent's estate. The hearing on petitioner's petition has
5 been continued six (6) times. Petitioner has gone to great lengths in searching for living heirs of
6 the decedent and has spent over \$1,200.00 of his own money in doing so. Also, petitioner's
7 attorneys have incurred over \$5,000 in attorney's fees for both attorney time and paralegal time in
8 searching for these living heirs, notifying them of these proceedings, preparing supplements to the
9 petition, etc.

10 8. The decedent died over a year ago, i.e., on [REDACTED]. The decedent
11 executed a Last Will and Testament before his death leaving his estate to his friend and neighbor,
12 [REDACTED] None of the living heirs are beneficiaries of the decedent's estate.

13 9. Lastly, as far as petitioner's attorney's are aware, none of the living heirs who have
14 been given notice of these probate proceedings have filed any documents with the court contesting
15 the decedent's Will. Again, petitioner asks the court to proceed with appointing him administrator
16 with Will Annexed so that these estate proceedings can finally move forward.

17
18 DATED: January 12, 2006.

19 [REDACTED]
20
21 By [REDACTED]
22 [REDACTED]
23 Attorneys for Petitioner, [REDACTED]
24
25
26
27
28

EXHIBIT "1"

MEMO

DATE: January 9, 2006
 FROM: Mary Ritch
 FOR: [REDACTED] Estate of [REDACTED]
 TO: [REDACTED]
 DocName: [REDACTED] Information\MRMEM201.DOC
 RE: Maternal First Cousins and First Cousins Once Removed of [REDACTED]

You had asked me to find as much information as I could on [REDACTED] maternal first cousins and first cousins once removed. The following is a summary of the results I found:

With the exception of [REDACTED], the decedent's maternal aunts and uncles were located in earlier genealogy reports. My goal was to find any information I could on [REDACTED] and also to find information on the children of [REDACTED] maternal aunts and uncles.

1. [REDACTED] (uncle of decedent) (date of death unknown)

[REDACTED] was listed on the 1885 Nebraska State Census as born abt. 1881 in Iowa, with both parents from Indiana.¹ In the 1900 Federal Census, [REDACTED] was still living with his parents. He was 19, born in Aug. 1880, born in Nebraska, and listed as "at school."² Note that he was 19 years old and still at school at that late age - I believe he may have been mentally disabled. There was a [REDACTED] listed in the 1910 census as an inmate in the Nebraska Institution for Feeble-Minded Youth. He was 29 years old, listed as born in Iowa with both parents born in Indiana.³ I searched the Nebraska census for any [REDACTED] born between 1880-1884 born in Iowa or Nebraska and this was the only "[REDACTED]" who came up. I couldn't find him on any later censuses. If he was institutionalized, chances are he did not marry.

I would suggest a further search for his death certificate from Nebraska to see if he was indeed married or not.

¹ Nebraska State Census 1885. [database online] Provo, UT: MyFamily.com, Inc., 2002. Original data: National Archives and Records Administration. Nebraska State Census 1885. M352, 56 rolls. Washington, D.C.: National Archives and Records Administration.

² 1900 Federal Census; Census Place: Omaha Ward 9, Douglas, Nebraska; Roll: T623 925; Page: 9B; Enumeration District: 91.

³ 1910 Federal Census; Census Place: Midland Twp, Gage, Nebraska; Series: T624; Roll: 846; Page: 111B; Enumeration District: 67; Part: 3; Line: [REDACTED]

2. [REDACTED] (aunt of decedent) (d. ca. 1915)

From earlier genealogy reports, [REDACTED] is listed as having had two children: [REDACTED]. I was unable to locate her date of death, but I believe she died sometime around 1915. In the 1930 Federal Census,⁴ her husband, [REDACTED], stated that he was 22 at the age of his first marriage, while his wife, [REDACTED], stated that she was 41 at the time of her first marriage. From this, I concluded that [REDACTED] was his second wife ([REDACTED] being his first wife). [REDACTED] were both 55 years old in the 1930 census. If she married at 41 (14 years prior), she would have married [REDACTED] around 1916. From earlier genealogy reports, the children, [REDACTED], were born ca. 1912 and 1914, respectively. It would appear that they were children by [REDACTED]'s former wife. (However, in the 1920 Federal Census,⁵ [REDACTED] lists his mother as from New York. [REDACTED], age 5, also lists his mother as from New York. In this census, [REDACTED] lists herself as from New York.) I obtained a death certificate for [REDACTED] but it lists his mother's birthplace as "unknown."⁶ I obtained death certificate on [REDACTED],⁷ which lists his mother's name as "[REDACTED]." However, the informant for the death certificate was his daughter, [REDACTED] and she may not have known the true identity of his birth mother. I therefore have not proved that [REDACTED] was their mother. However, [REDACTED]'s middle initial stands for "[REDACTED]" so this, plus the age calculations above, would be indirect evidence of his maternal ancestry. I would suggest obtaining birth certificates from Nebraska to conclusively prove that [REDACTED] and [REDACTED]'s mother was [REDACTED].

In an earlier genealogy report, it was questioned whether or not [REDACTED] of Los Angeles listed in the 1920 and 1930 Federal Censuses was indeed the same man as [REDACTED] from the 1900 Federal Census in Omaha.⁸ This can be confirmed by the 1920 census, which lists his mother, [REDACTED], age 81, born in Tennessee, living with the family. This can also be indirectly confirmed by the fact that he listed his profession as "traveling salesman" on all Federal Censuses from 1900 to 1930 (1900: boots/shoes; 1910: shoes⁹; 1920: wholesale grocery; 1930: unspecified.)

2.1. [REDACTED] (first cousin of decedent) (d. 1971)

[REDACTED] was listed as 17 years old in the 1930 c. He would have been born ca. 1913. He was listed as part of the household of [REDACTED]. He was listed at the bottom of the census, but was clearly indicated as part of household number [REDACTED]. He listed his father as being [REDACTED].

⁴ 1930 Federal Census; Census Place: Los Angeles, Los Angeles, California; Roll: 137; Page: [REDACTED] Enumeration District: 131; Image: [REDACTED]

⁵ 1920 Federal Census; Census Place: Los Angeles Assembly District 72, Los Angeles, California; Roll: T625_113; Page: [REDACTED]; Enumeration District: 371; Image: [REDACTED]

⁶ [REDACTED], death certificate, State File No. [REDACTED] (1971), County Recorder's Office, Los Angeles, California.

⁷ [REDACTED], death certificate, State File No. [REDACTED] (1997), State of Maryland / Department of Health and Mental Hygiene, Division of Vital Records.

⁸ 1900 Federal Census; Census Place: Omaha Ward 9, Douglas, Nebraska, *supra*.

⁹ 1910 Federal Census; Census Place: 2-Wd Jamestown, Stutsman, North Dakota; Series: T624; Roll: 1147; Page: [REDACTED]; Enumeration District: 223; Part: 1; Line: [REDACTED]

from Illinois and mother as being born in the "United States." He was living with a 16-year-old [REDACTED], "lodger." A search of the California Death Index confirmed that he was born [REDACTED] May 1912 in Nebraska and died [REDACTED] Dec 1971 in Los Angeles.¹⁰ No mother's maiden name was listed.

I ran [REDACTED]'s SSN [REDACTED] (provided in earlier genealogy reports) through Accurant. No relevant information was found.

I obtained a copy of [REDACTED]'s death certificate which indicated that his middle initial was "[REDACTED]" and that his father's name was [REDACTED]. It also confirmed the birth and death dates above. It did not list any information for his mother. It stated that he had been an electrician for [REDACTED] Studios for 38 years. *(This was later confirmed in a telephone conversation by paralegal [REDACTED] with his nephew, [REDACTED] of Maryland¹¹)* His wife was [REDACTED]. His address at the time of death was [REDACTED] Dickens Street, Sherman Oaks, CA ([REDACTED] Apartments). I contacted both the mortuary which performed the services on him, as well as the apartment complex he lived in. I did not hear back.

I obtained an obituary for [REDACTED] which indicated that he was survived by his spouse, [REDACTED], and a son, [REDACTED], who had 3 children. He was also survived by a brother, [REDACTED].¹²

A search of Ancestry.com revealed an obituary for a sister of [REDACTED]¹³. The obituary indicated that as of December, 2004, [REDACTED] was still alive and residing in Sun City, CA. A search of Sun City phone records revealed no listing for her. However, I was able to contact the mortuary who performed the services and they put me in touch with the deceased sister's surviving spouse, who had contact information for [REDACTED]. Paralegal [REDACTED] spoke with [REDACTED], who gave her contact information for [REDACTED]'s son, [REDACTED]. [REDACTED] also spoke with [REDACTED]. [REDACTED] is [REDACTED]'s son by a prior marriage to a woman named "[REDACTED]." [REDACTED] and [REDACTED] had no other children, and [REDACTED] and [REDACTED] had no children.¹⁴

2.1.1. [REDACTED] (first cousin once removed of decedent) (living)

[REDACTED] Stansbury Avenue
Panorama City, CA 91402
[REDACTED]

¹⁰ California Death Index, 1940-1997; <ancestry.com>

¹¹ Telephone conversation by Paralegal [REDACTED] with [REDACTED] of Dundalk, Maryland, 16 Nov 2005.

¹² Los Angeles Times (1886-Current File): Dec. 15, 1971; ProQuest Historical Newspapers Los Angeles Times (1881-1985) pg. [REDACTED]

¹³ Obituary of [REDACTED], The Press-Enterprise, [REDACTED] Dec 2004, Riverside, California <ancestry.com>

¹⁴ Telephone conversation by Paralegal [REDACTED] with [REDACTED] of Sun City, California and [REDACTED] of Panorama City, California, 22 Nov 2005.

2.2. [REDACTED] (d. 1997) (first cousin of decedent)

[REDACTED] was listed in the 1930 Federal Census as age 15 and living in the household of [REDACTED]. His father was from Illinois and mother was born in the "United States."

I found a [REDACTED] with the right birth and death dates listed in the Social Security Death Index.¹⁵ It indicated he was born [REDACTED] Nov 1914 and died [REDACTED] May 1997. It also indicated he last lived in Baltimore, Maryland. A search of address records on Ancestry.com revealed his last known address was at [REDACTED] Watersedge Road in Dundalk, Maryland, a suburb of Baltimore.¹⁶ I ran his SSN ([REDACTED]) through Accurint and found possible relatives [REDACTED] of Baltimore. I also found that his property on Watersedge Road had been sold by a [REDACTED] in 2000. I ran [REDACTED] through Whitepages.com and found his contact information -- in the same city as [REDACTED] -- Dundalk, Maryland. (It turned out that he was [REDACTED]'s son.) The Accurint report also gave me contact information for [REDACTED]'s sister. Paralegal [REDACTED] spoke with [REDACTED] and he confirmed the names and general whereabouts of his sisters: [REDACTED], who lives in NJ, and [REDACTED], who also lives in Baltimore.¹⁷ [REDACTED] also spoke with [REDACTED], who confirmed that she is the sister of [REDACTED] and offered to furnish us the contact information for her sisters at a later date.¹⁸ As she has refused further telephone contact with us, we have not been able to obtain this information from her. Her brother, [REDACTED], has also refused further telephone contact with us.

First Cousins Once Removed:

2.2.1. [REDACTED] (living) (age 56)

[REDACTED] Dineen Dr
Dundalk, MD 21222-4725
[REDACTED]

2.2.2. [REDACTED] (living) (age 54)

[REDACTED] Falls Rd.
Baltimore, MD 21211-1223
[REDACTED]

2.2.3. [REDACTED] (living)

New Jersey (?)

2.2.4. [REDACTED] (living)

Baltimore, MD (?)

¹⁵ Social Security Death Index (SDDI); <ancestry.com>

¹⁶ U.S. Phone and Address Directories, 1993-2002; <ancestry.com>

¹⁷ Telephone conversation by Paralegal [REDACTED] with [REDACTED], supra.

¹⁸ Telephone conversation by Paralegal [REDACTED] with [REDACTED] of Baltimore, Maryland, 21 Nov 2005

3. [REDACTED] (aunt of decedent) (covered fully in prior genealogy reports)

4. [REDACTED] (uncle of decedent)

From information supplied in a previous genealogy report, I searched the California Death Index¹⁹ for [REDACTED]. I came up with his SSN ([REDACTED]), which I then ran through Accurant. No useful information was found. I also found his wife, [REDACTED]'s, social security number ([REDACTED]) on the California Death Index, and ran her through Accurant. I found nothing.

I then reviewed the copy of his wife [REDACTED]'s death certificate for any useful information. I wrote to Pacific Beach Mortuary, the funeral home which had handled her mortuary services, and they gave me some very useful leads. I spoke with Crystal at Pacific Beach Mortuary,²⁰ who told me they could not locate records for [REDACTED], but they did locate records on [REDACTED].²¹ He was employed at San Diego City Schools and died at College Park Hospital on 6666 Montezuma Rd., San Diego 92115. I did a Google Search and this hospital did not show up. (Per Crystal, the hospital is no longer in business.) She also said the crematorium where his wife [REDACTED] was cremated (Cypress View) only keeps records for 10 years. Crystal wasn't allowed to fax me copies of any information, but she read the following to me from his file: The physician's certification was signed by Sol Lizerbram, M.D., 4205 Fairmont Ave. [REDACTED] had 12 grandchildren and 4 great-grandchildren at the time of his death, but she had no names. [REDACTED]'s daughter, [REDACTED], signed the contract for funeral expenses. They were to be paid out of a trust account at Imperial Savings under his SS#. She didn't know what branch. (Imperial went out of business in 1992). [REDACTED]'s address at the time was [REDACTED] S. Escondido Blvd., Escondido, CA 92025. She also showed a "daughter/neighbor" phone number of [REDACTED]. She also showed a [REDACTED] listed as son who lived in Riverside (no address).

I wrote to the California State Teachers' Retirement System as well as the California Public Employees Retirement System for any beneficiary information. CalSTRS had no information. I have not heard back yet from CalPERS. I also wrote to his physician, Sol Lizerbram, who informed me that he was just the staff physician on call at the hospital and Butler was not his patient and he had no information.

I knew from a previous genealogy report that [REDACTED] had deposited a will in San Diego in 1980. I contacted the San Diego Superior Court and since we are not authorized to receive a certified copy of [REDACTED]'s death certificate, we cannot obtain a copy of the deposited will without a court order.

¹⁹ California Death Index, *supra*.

²⁰ Telephone conversation by Mary Ritch of [REDACTED] with Crystal at Pacific Beach Mortuary of San Diego, California, 11 Nov 2005.

²¹ [REDACTED] death certificate, State File No. [REDACTED] (1979), County Recorder's Office, San Diego, California.

From information supplied in a previous genealogy report (from the 1930 Federal Census), I knew that [REDACTED] had four children: [REDACTED] I only knew their names and approximate years of birth.

I searched on Ancestry.com and found the following information:

- 4.1. [REDACTED] (first cousin of decedent) (d. 1989)
(b. [REDACTED] Oct 1916 in Nebraska – d. [REDACTED] Mar 1989 in San Diego, CA)

I searched the California Birth Index²² for all persons of the surname [REDACTED] whose mother's maiden name was [REDACTED] and found a listing for [REDACTED]. I also found his SSN ([REDACTED]), which I ran through Accurint. I found no useful information, other than a contact at the address where his property was located ([REDACTED] Concrete Construction, Inc.).

I contacted the San Diego Public Library for a copy of his obituary. They were unable to locate it in the archives of the San Diego County Union-Tribune Newspaper.

I searched Ancestry.com and found his WWII enlistment records, which showed he was single with no dependents at the time of his enlistment, [REDACTED] Apr 1941. His civil occupation was as a construction carpenter and had taken an examination for the same.²³ I have not yet researched any military pension records or examination records.

I obtained a copy of [REDACTED]'s death certificate.²⁴ Per his certificate, his remains were cremated and given to his niece, [REDACTED]. She had an address in common with [REDACTED] – [REDACTED] Hubbles Lane in Santee, CA. Here is her contact info from when she lived at the same address as [REDACTED] did. Note her husband's name:

[REDACTED]
Spouse: [REDACTED]
Address: [REDACTED] Hubbles Ln City: Santee
State: California Zip Code: 92071
Phone Number: [REDACTED]
Residence Years: 1996

I ran an Accurint report on her at this address and found that she had worked for [REDACTED] Concrete Pumping during this time. (*This company name had come up on the Accurint report I ran on [REDACTED].*) Per Accurint, here is [REDACTED]'s current address and phone as of October, 2005:

²² California Birth Index, 1905-1995; <ancestry.com>

²³ National Archives and Records Administration. U.S. World War II Army Enlistment Records, 1938-1946 [database online]. Provo, Utah: MyFamily.com, Inc., 2005. Original data: Electronic Army Serial Number Merged File, 1938-1946 [Archival Database]; World War II Army Enlistment Records; Records of the National Archives and Records Administration, Record Group 64; National Archives at College Park, College Park, MD.

²⁴ [REDACTED] death certificate, State File No. [REDACTED] (1989), County Recorder's Office, San Diego, California.

████████████████████
██████████ W MADISON AVE APT ██████████
EL CAJON CA 92020-3253

Per her Accurint report, her husband's name was ██████████. He was born ██████████ Nov 1940 and died ██████████ Aug 2001 in San Diego. Per the California Birth Index, his mother's maiden name was ██████████ and he was born in San Diego.²⁵ I concluded that this must be the son of ██████████ (b. ca. 1919 in Nebraska). (This was subsequently confirmed.)

For further information on ██████████, see the entry below on ██████████.

Per ██████████'s death certificate, he was divorced. I have been unable to determine if he had any issue. Since the informant on his death certificate and the custodian of his remains was his niece, it is possible he did not have any living children at the time of his death. This information was not confirmed by ██████████ during her phone conversation with ██████████.²⁶ We need to address this in future contact with Mrs. ██████████.

4.2. ██████████ (first cousin of decedent)
(b. ██████████ Jul 1918 in Nebraska – d. ██████████ Dec 1977 in San Diego)

Prior to obtaining the information from ██████████'s death certificate, I had done a preliminary search on ██████████ and had found a possible match in the U.S. Social Security Death Index; however, this person had died in Santa Barbara. I had run the number through Accurint and had found no useful information. Since two of her siblings had died in San Diego, it was reasonable to assume that I was looking for someone who had died in San Diego. I had found no listings in the California Death Index of any ██████████ with a mother's maiden name of ██████████ who were born in 1919 in Nebraska and died in San Diego. I had also searched surrounding years of birth, for all counties in California, and turned up nothing. I also had found no marriage records on Ancestry.com.

Once I determined that ██████████'s husband, ██████████, was probably the child of ██████████, I searched the California Death Index for a ██████████ who died in San Diego, and came up with our ██████████. Her birth date is correct (it was 1918, not 1919) and she was born in Nebraska. Below is her information.²⁷ As of November 30, I have not yet run an Accurint search on her Social Security Number.

████████████████████
Social Security #: ██████████
Sex: FEMALE
Birth Date: ██████████ Jul 1918
Birthplace: NEBRASKA

²⁵ California Birth Index, *supra*.

²⁶ Telephone conversation by Paralegal ██████████ with ██████████ of El Cajon, California, 1 Dec 2005.

²⁷ California Death Index, *supra*.

Death Date: █ Dec 1977
Death Place: SAN DIEGO

I searched the California Birth Index for children born in San Diego to the surname █ with the mother's maiden name of Butler and found the following names. The close proximity of their birth dates led me to conclude they were probably the other children of █²⁸, and this was subsequently confirmed by █²⁹. She also supplied the names of her and █'s children, as follows.

First Cousins Once Removed of Decedent:

4.2.1. █ (d. 2001)

█ is the only one who is deceased, per a search of the California Death Index and the Social Security Death Index. His social security number was █. I did not run an Accurant search on his Social Security Number.³⁰

4.2.1.1. █ (first cousin twice removed of Decedent) (living)

b. █ Oct 1968³¹
█ Marsh Street
Kansas City, MO 64134

4.2.1.2. █ (first cousin twice removed of Decedent) (living)

b. █ Sep 1970³²
█ W. Madison Avenue, Apt. █
El Cajon, CA 92020-3253

4.2.2. █ (b. █ Nov 1941 San Diego) (living)³³

█ Decook Drive
Sterling Heights, MI 48313
█

4.2.3. █ (b. █ Sep 1942 San Diego) (living)³⁴

█ Holland Lane
Anza, CA 92539

²⁸ California Birth Index, *supra*.

²⁹ Telephone conversation by Paralegal █ with █, *supra*.

³⁰ Social Security Death Index (SDDI), *supra*.

³¹ California Birth Index, *supra*.

³² California Birth Index, *supra*.

³³ Telephone conversation by Paralegal █ with █ (spouse of █) of Detroit, Michigan, 1 Dec 2005.

³⁴ Telephone conversation by Paralegal █ with █, *supra*.

4.2.4. [REDACTED] (b. [REDACTED] Sep 1945 San Diego) (living)³⁵
[REDACTED] Dessi Street
Kanapolis, NC 28051

4.2.5. [REDACTED] (b. [REDACTED] Feb 1955 San Diego) (living)
[REDACTED] Mobile Home Park
[REDACTED] Highway 8 Business, Space [REDACTED]
Lakeside, CA 92040-5220

Because I initially had no information on [REDACTED]'s current address, I ran searches on Google and Accurint on him and came up with an address and phone. Paralegal [REDACTED] called on 12/8 and got no answer and no machine. She also called his last address (in Lemon Grove, CA, per Accurint) and was informed that although they used to rent to him, he no longer lives there. A "[REDACTED]" and "[REDACTED]" showed up on his Accurint report as possible children. A search of the California Birth Index showed he had 3 sons: [REDACTED], [REDACTED], and that his wife's maiden name was [REDACTED]. All three were born in San Diego.³⁶ A search of their names on Accurint revealed that they were living in [REDACTED] Mobile Home Park in Lakeside, CA. [REDACTED] called the manager of the mobile home park ([REDACTED]) who said she would give [REDACTED] the message to call us. [REDACTED] subsequently spoke with [REDACTED] who verified that [REDACTED]'s address is at the same mobile home park in Lakeside as his sons.³⁷

4.3. [REDACTED] (first cousin of decedent) (d. 2000)
(b. ca. 1/[REDACTED] 1921 in Nebraska - d. 8/[REDACTED] 2000 in San Diego)

I located an obituary for [REDACTED]. It gave her birth and death dates, and indicated she was born in Nebraska and was a homemaker. Survivors included her husband, [REDACTED]; daughter, [REDACTED]; son, [REDACTED]; and two grandchildren. Private services were held at El Camino Memorial Park. Arrangements: Pacific Beach Mortuary. She resided in Escondido.³⁸

A search of the California Death Index for children with the surname [REDACTED] whose mother's name was [REDACTED] revealed the following children:³⁹

- [REDACTED], b. [REDACTED] Apr 1948 in San Diego County
- [REDACTED], b. [REDACTED] Sep 1953 in Alameda County

A search of the Social Security Death Index gave me [REDACTED]'s social security number and last known residence, which was the same address she gave on the death certificate of her

³⁵ Telephone conversation by Paralegal [REDACTED] with [REDACTED], *supra*

³⁶ California Birth Index, *supra*

³⁷ Telephone conversation by Paralegal [REDACTED] with [REDACTED] of El Cajon, California, 14 Dec 2005

³⁸ The San Diego Union-Tribune County Obituaries, August 25, 2000, Page(s): [REDACTED] Record Number: [REDACTED]

³⁹ California Birth Index, *supra*.

father, [REDACTED]⁴⁰ This was confirmed by an Accurint search, which also gave me her prior residences which were at the same mobile home park as her parents. It also gave me her spouse's name and children's names and son's contact information. Paralegal [REDACTED] contacted [REDACTED] and spoke with his wife [REDACTED] and confirmed his and his sister's addresses.⁴¹ She also discovered that they had a sister named [REDACTED] who had murdered her husband and committed suicide in the 1990s. She had children but [REDACTED] did not know the names.

First Cousins Once Removed:

4.3.1. [REDACTED] (living)

[REDACTED] Trebber St. NE
Keizer OR 97303-1736
[REDACTED]

4.3.2. [REDACTED] (living)

[REDACTED] Cinnamon Hill Drive SE
Salem, OR 97306

4.3.3. [REDACTED] (d. May 1995, San Diego)

b. [REDACTED] Oct 1941 (San Diego Co.)

A search the California Death Index for a child named "[REDACTED]" whose mother's name was [REDACTED] revealed [REDACTED]'s birth and death dates in San Diego, and her social security number.⁴² She died in 1995, which is consistent with her sister-in-law's story. However, her surname was [REDACTED], which may indicate that [REDACTED] had a prior marriage to a man named [REDACTED].

An Accurint search on [REDACTED] revealed a possible husband, [REDACTED] whose date of death was the same as hers. This is consistent with [REDACTED] story. The murder-suicide story was confirmed by an article found in the San Diego County Union-Tribune. It also confirmed the name of [REDACTED]'s husband, [REDACTED]. According to the article, their [REDACTED]-year-old son ([REDACTED]) discovered the bodies. Homicide Sgt. [REDACTED] handled the case. I have not yet contacted him for any information.⁴³

The Accurint search also revealed the following possible children:

4.3.3.1. [REDACTED] b. June 1976 (first cousin twice removed) (living)

4.3.3.2. [REDACTED] b. Oct 1977 (first cousin twice removed) (living)

⁴⁰ Social Security Death Index (SDDI), *supra*.

⁴¹ Telephone conversation by Paralegal [REDACTED] with [REDACTED] of Keizer, Oregon, 17 Nov 2005

⁴² California Death Index, *supra*.

⁴³ San Diego County Union-Tribune, May 19, 1995, p. [REDACTED], Record No. [REDACTED]

Paralegal [REDACTED] called the phone numbers listed for both of them on the Accurint search; however, they were generic voice mail systems and it was not evident that they were at the numbers. Also, the numbers were not listed to them; rather, they were listed to other people living at the same address. Messages were left on 11/21/05, but we have not yet heard back. Accurint and Whitepages.com searches were conducted on them, but yielded no useful results, except a possible associate common to both, [REDACTED] who also showed up on their mother's Accurint report. [REDACTED] called her on 11/21/05 and left a message on her voice mail at [REDACTED]. (Paralegal [REDACTED] heard from [REDACTED] of El Cajon, CA ([REDACTED]'s ex-wife) on 11/28/05. She said [REDACTED] lives in Washington and she would ask him to call us and give us contact information for him and his brother. [REDACTED] called back on 12/7 and said she would give him the message again to call us.⁴⁴ We have not yet heard from him.

Several addresses and phone numbers were found for [REDACTED] in Spokane, WA but they were generic voice recorders. [REDACTED] left messages on 12/7/05. Also, attempts were made to reach [REDACTED]'s possible spouses or girlfriends in Spokane per his Accurint report, [REDACTED] or [REDACTED] and [REDACTED] but their numbers were disconnected. [REDACTED] left a message on the number for a "[REDACTED]" in Spokane (" [REDACTED]" was another name of his) but we have not yet heard back. [REDACTED] called another [REDACTED] [REDACTED] in Maple Valley, WA on 12/8 and left a message. (She called back on 12/12 and advised [REDACTED] that she is not related to him in any way.) [REDACTED] also called the number at his last address per Accurint ([REDACTED]) on 12/8 and was told he does not live there.

4.3.4. [REDACTED] (possible first cousin once removed)

b. [REDACTED] Nov 1944 in San Francisco County

A search of the California Birth Index for children with mother's maiden name [REDACTED] and father's surname [REDACTED] revealed this child, who may be [REDACTED]'s brother. He was born 3 years after she was. It is conceivable that he was born in San Francisco County because of the war. At any rate, it is too coincidental to ignore.

An Accurint report revealed possible contact information for him at [REDACTED] Hideaway Lane, Plano TX 75093-2608. A search through Whitepages.com revealed the following phone number and address, which is consistent with a recent address from his Accurint report: RR [REDACTED] Bonham, TX 75418-9701, [REDACTED]. Paralegal [REDACTED] called and left a message at this number on 11/21/05, but we have not yet heard back.

4.4. [REDACTED] (first cousin of decedent) (death date unknown)

(b. [REDACTED] Jun 1924 in San Diego County, CA – d. aft. 1930)

I searched the California Birth Index for all children with the surname [REDACTED] born with a mother's maiden name of [REDACTED], and found a listing for [REDACTED]⁴⁵ I found no others.

⁴⁴ Telephone conversations by Paralegal [REDACTED] with [REDACTED] of El Cajon, California, 28 Nov 2005 and 7 Dec 2005.

⁴⁵ California Birth Index, *supra*.

██████████ may have died before 1940 because he was not in the California Death Index, which starts in 1940, and I could not find him in any searches of the WWII or Korean War military indexes. He would have been 18 in 1942 so chances are he would have enlisted. (His brother did.) Or he may still be alive, but I found no phone listings for him in San Diego County, and I found no such person in Accurint.

I contacted the San Diego Public Library Newspaper Room on 12/8/05 to try to find any obituaries or newspaper articles on him. They found nothing in obituaries and gave me the names of local researchers to try.

EXHIBIT "2"

Table of Consanguinity

(Maternal Side)

as of January 5, 2006

