

PLAINTIFF/PETITIONER: Lion Share Investments, LLC DEFENDANT/RESPONDENT: Rex Regum, LLC, et al.	CASE NUMBER: 19-CIV-00018
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COURT'S RECOVERY OF WAIVED COURT FEES AND COSTS

If a party whose court fees and costs were initially waived has recovered or will recover \$10,000 or more in value by way of settlement, compromise, arbitration award, mediation settlement, or other means, the court has a statutory lien on that recovery. The court may refuse to dismiss the case until the lien is satisfied. (Gov. Code, § 68637.)

Declaration Concerning Waived Court Fees

1. The court waived court fees and costs in this action for (name): Sara Jansohn
2. The person named in item 1 is (check one below):
 - a. not recovering anything of value by this action. [As of this partial dismissal. The action is still pending.]
 - b. recovering less than \$10,000 in value by this action.
 - c. recovering \$10,000 or more in value by this action. (If item 2c is checked, item 3 must be completed.)
3. All court fees and court costs that were waived in this action have been paid to the court (check one): Yes No

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: April 18, 2023

Craig Davis
 (TYPE OR PRINT NAME OF ATTORNEY PARTY MAKING DECLARATION)

▶ 
 (SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Craig Davis (SBN 268194), Law Offices of Craig Davis
912 Cole Street, Suite 102, San Francisco, CA 94117
TELEPHONE NO.: 415.857.5820 FAX NO. (Optional): 415.795.4595
E-MAIL ADDRESS (Optional): cdavis@craigdavislaw.com
ATTORNEY FOR (Name):

FOR COURT USE ONLY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO
STREET ADDRESS: 400 County Center
MAILING ADDRESS:
CITY AND ZIP CODE: Redwood City, CA 94063
BRANCH NAME:

PLAINTIFF/PETITIONER: Lion Share Investments, LLC
DEFENDANT/RESPONDENT: Rex Regum, LLC, et al.

REQUEST FOR DISMISSAL

CASE NUMBER: 19-CIV-00018

A conformed copy will not be returned by the clerk unless a method of return is provided with the document.

This form may not be used for dismissal of a derivative action or a class action or of any party or cause of action in a class action. (Cal. Rules of Court, rules 3.760 and 3.770.)

1. TO THE CLERK: Please **dismiss** this action as follows:

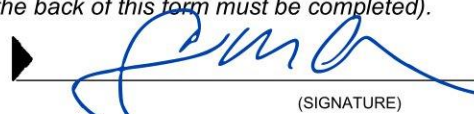
- a. (1) With prejudice (2) Without prejudice
- b. (1) Complaint (2) Petition
- (3) Cross-complaint filed by (name): on (date):
- (4) Cross-complaint filed by (name): on (date):
- (5) Entire action of all parties and all causes of action
- (6) Other (specify):* *Only* the claim for cancellation of instruments in Sara Jansohn's 4/30/19 cross-complaint

2. (Complete in all cases except family law cases.)

The court did did not waive court fees and costs for a party in this case. (This information may be obtained from the clerk. If court fees and costs were waived, the declaration on the back of this form must be completed).

Date: April 18, 2023

..... Craig Davis
(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)


(SIGNATURE)

*If dismissal requested is of specified parties only of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

Attorney or party without attorney for:
 Plaintiff/Petitioner Defendant/Respondent
 Cross-Complainant

3. TO THE CLERK: Consent to the above dismissal is hereby given.**

Date:

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)


(SIGNATURE)

** If a cross-complaint – or Response (Family Law) seeking affirmative relief – is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581 (i) or (j).

Attorney or party without attorney for:
 Plaintiff/Petitioner Defendant/Respondent
 Cross-Complainant

(To be completed by clerk)

- 4. Dismissal entered as requested on (date):
- 5. Dismissal entered on (date): as to only (name):
- 6. Dismissal **not entered** as requested for the following reasons (specify):
- 7. a. Attorney or party without attorney notified on (date):
- b. Attorney or party without attorney not notified. Filing party failed to provide a copy to be conformed means to return conformed copy

Date: Clerk, by _____, Deputy

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PROOF OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of 18 years and not a party to this action. My business address is: Law Offices of Craig Davis, 912 Cole Street, Suite 102, San Francisco, CA 94117-4316.

On **April 18, 2023**, I served the following document(s) described as:

**SARA JANSOHN’S CASE MANAGEMENT AND TRIAL SETTING
CONFERENCE STATEMENT**

by serving a true copy of the above-described document(s) in the following manner:

BY EMAIL

Based on an agreement of the parties to accept electronic service, I emailed the above-referenced document(s) from my electronic service address, *cdavis@craigdavislaw.com*, to:

I enclosed the above-described document(s) in a sealed envelope or package addressed to the persons at the addresses set forth below and deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

Jeffrey H. Lowenthal
Steyer Lowenthal Boodrookas Alvarez &
Smith LLP
235 Pine Street, 15th Floor
San Francisco, CA 94104

*Attorneys for Plaintiff and Cross-Defendant
Lion Share Investments, LLC*

David A. Trinh
Trinh Law
255 North Market Street #125
San Jose, CA 95110

*Attorneys for Cross-Defendant
Lion Share Investments, LLC and John Chau*


Justin Rodgers Hall
Rex Regum, LLC
1626 N. Wilcox Ave #128
Hollywood, CA 90028

*Defendants and Cross-Defendants Justin Rodgers Hall
and Rex Regum, LLC (Self-represented)*

Andrew S. Cantor
Law Office of Andrew S. Cantor
4132 3rd St #7
San Francisco, CA 94124

*Limited Scope Attorney for Defendant and
Cross-Defendant Rex Regum, LLC*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **April 18, 2023**, in San Francisco, California.



Craig Davis
LAW OFFICES OF CRAIG DAVIS

1 **III. Status of the Pleadings**

2 All parties have been served the complaint and cross-complaint. Cross-Defendant Miller
3 never answered Jansohn's cross-complaint. Jansohn has filed a request for entry of default as to
4 Miller and a request to dismiss her claim for cancellation of instruments. Jansohn's only remaining
5 claim is the claim for elder financial abuse against all parties.

6 **IV. Status of ADR**

7 The parties, except for Miller, attended a productive mediation session on August 2, 2021.
8 Jansohn does not understand why Defendants Justin Rodgers Hall and Rex Regum LLC have since
9 refused to discuss finalizing a settlement. Rex Regum LLC received \$997,000 from Plaintiff Lion
10 Share in exchange for a grant deed that has since been declared *void*. Plaintiff has repeatedly
11 explained to Hall and Rex Regum that the order declaring that grant deed void is final because
12 Lion Share's appeal in the criminal matter was unsuccessful. It is baffling that Hall and Rex Regum
13 apparently think they can retain the proceeds of a purported sale that has since been declared void.

14 **V. Trial Setting**

15 This CMC/TSC has been previously continued to allow time for the conclusion of the
16 criminal trial against Justin Rodgers Hall. Jansohn asks that that the trial be set sometime between
17 March and May 2024; she requests a 5-7 day jury trial for Jansohn's elder financial abuse claims.

18 **VI. Status of Discovery**

19 Jansohn and Lion Share have exchanged documents and Jansohn sat for a deposition.
20 Jansohn still needs to depose Lion Share. Defendant Hall has been uncooperative in discovery and
21 has indicated that he will not cooperate until his criminal trial is complete. Jansohn wants to get
22 documents from Hall and Rex Regum before deposing Plaintiff/Cross-Defendant Lion Share.

24 Dated: April 18, 2023

Respectfully submitted,

25 */s/ Craig Davis*

26 _____
27 Craig Davis
28 LAW OFFICES OF CRAIG DAVIS
Attorney for Sara Jansohn

1 Jansohn repeatedly contacted defendant Justin Hall and counsel for defendant Rex Regum
2 to attempt to meet and confer prior to this CMC/TSC. They both refused to acknowledge me.
3 Defendants received \$997,000 from sale that has been *voided*. They refuse to return the money.
4 Jansohn intends to file an *ex parte* application next week to seek a TRO and preliminary injunction
5 to prevent Hall and Rex Regum from absconding with the \$997,000.

6 **I. Statement of the Case.**

7 Sara Jansohn has lived at her family home, at 147 Alameda de las Pulgas in Redwood City,
8 for nearly her entire life. In July 2018, Jansohn had over a million dollars of equity in her home and
9 sought a reverse mortgage to pay her property taxes. Defendant Tonika Miller, a licensed real estate
10 professional, came to Jansohn's house unsolicited and promised to help Jansohn secure a reverse
11 mortgage. At a meeting with Miller at Applebee's on July 23, 2018, Jansohn thought she was signing
12 papers for a reverse mortgage. Less than an hour later, as the County Recorder's office was closing
13 at 5:00 pm, a purported July 23, 2018 Grant Deed was recorded in the San Mateo County Official
14 Records. This Grant Deed purported to convey Jansohn's family home to Rex Regum LLC, the
15 LLC controlled by Defendant Justin Rodgers Hall, for \$800,000.

16 Less than a month later, Plaintiff Lion Share purportedly paid \$997,000 to Rex Regum for
17 Jansohn's home. Lion Share then filed this quiet title action. Jansohn filed a cross-complaint against
18 all parties for elder financial abuse and for cancellation of the purported July 23, 2018 Grant Deed.

19 **II. Related Cases**

20 The District Attorney has filed related felony complaints against Defendants Miller and Hall.

21 18-SF-014403-B - *The People of the State of California vs. Tonika Lynette Miller*

22 Miller pled *nolo contendere* to three criminal charges, including the procurement and offering
23 of a false and forged grant deed, in violation of Penal Code § 115(a). At her sentencing, Miller
24 admitted that she falsely told Jansohn that the documents were for a "reverse mortgage." On
25 October 19, 2020, Judge Lee ordered that the purported July 23, 2018 Grant Deed is void *ab initio*.
26 Lion Share appealed that order, but the Court of Appeal affirmed. The order is now final.

27 18-SF-014403-A - *The People of the State of California vs. Justin Rodgers Hall*

28 The People's case against Hall is set for a trial readiness conference on April 28, 2023.

1 LAW OFFICES OF CRAIG DAVIS

2 Craig Davis (SBN 268194)

3 cdavis@craigdavislaw.com

4 912 Cole Street, Suite 102

5 San Francisco, CA 94117-4316

6 Tel.: 415.857.5820

7 Fax: 415.795.4595

8 Attorney for Defendant and Cross-Complainant

9 SARA JANSOHN

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN MATEO

12 UNLIMITED JURISDICTION

13 LION SHARE INVESTMENTS, LLC,

14 Plaintiff,

15 v.

16 REX REGUM, LLC;
17 JUSTIN RODGERS HALL;
18 TONIKA LYNETTE MILLER;
19 SARA JANE JANSOHN;
20 and DOES 1-100,

21 Defendants.

CASE NO. 19-CIV-00018

**CASE MANAGEMENT AND TRIAL
SETTING CONFERENCE STATEMENT
OF CROSS-COMPLAINANT AND
DEFENDANT SARA JANSOHN**

Date: April 18, 2023

Time: 9:00 a.m.

Dept.: Department 2

Place: 400 County Center,
Redwood City, CA 94063

22 SARA JANE JANSOHN,

23 Cross-Complainant,

24 v.

25 REX REGUM, LLC;
26 JUSTIN RODGERS HALL;
27 TONIKA LYNETTE MILLER;
28 LION SHARE INVESTMENTS, LLC;
JOHN CHAU;
and DOES 101-200,

Cross-Defendants.

Assigned To: Hon. Marie S. Weiner

Department: 2

Action Filed: January 3, 2019

Trial Date: TBD

Plaintiff/Petitioner: Lion Share Investments, LLC Defendant/Respondent: Rex Regum, LLC, et al.	CASE NUMBER: 19-CIV-00018
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8. Declaration of nonmilitary status (required for a judgment).

No defendant/respondent named in item 1c is in the military service of the United States as defined by either the Servicemembers Civil Relief Act (see 50 U.S.C. § 3911(2)) or California Military and Veterans Code sections 400 and 402(f).

I know that no defendant/respondent named in item 1c is in the U.S. military service because (check all that apply):

- a. the search results that I received from <https://scra.dmdc.osd.mil/> say the defendant/respondent is not in the U.S. military service.
- b. I am in regular communication with the defendant/respondent and know that they are not in the U.S. military service.
- c. I recently contacted the defendant/respondent, and they told me that they are not in the U.S. military service.
- d. I know that the defendant/respondent was discharged from U.S. military service on or about (date):
- e. the defendant/respondent is not eligible to serve in the U.S. military because they are:
 - incarcerated
 - a business entity
- f. other (specify):

Notice

U.S. military status can be checked online at <https://scra.dmdc.osd.mil/>.

If the defendant/respondent is in the military service, or their military status is unknown, the defendant/respondent is entitled to certain rights and protections under federal and state law before a default judgment can be entered.

For more information, see <https://selfhelp.courts.ca.gov/military-defaults>.

I declare under penalty of perjury under the laws of the State of California that the foregoing item 8 is true and correct.

Date:

_____  _____

(TYPE OR PRINT NAME) (SIGNATURE OF DECLARANT)

Plaintiff/Petitioner: Lion Share Investments, LLC Defendant/Respondent: Rex Regum, LLC, et al.	CASE NUMBER: 19-CIV-00018
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4. **Legal document assistant or unlawful detainer assistant (Bus. & Prof. Code, § 6400 et seq.).** A legal document assistant or unlawful detainer assistant did did **not** for compensation give advice or assistance with this form. If declarant has received **any** help or advice for pay from a legal document assistant or unlawful detainer assistant, state:

- a. Assistant's name:
- b. Street address, city, and zip code:
- c. Telephone no.:
- d. County of registration:
- e. Registration no.:
- f. Expires on (date):

5. **Declaration under Code Civ. Proc., § 585.5** (for entry of default under Code Civ. Proc., § 585(a)). This action

- a. is is not on a contract or installment sale for goods or services subject to Civ. Code, § 1801 et seq. (Unruh Act).
- b. is is not on a conditional sales contract subject to Civ. Code, § 2981 et seq. (Rees-Levering Motor Vehicle Sales and Finance Act).
- c. is is not on an obligation for goods, services, loans, or extensions of credit subject to Code Civ. Proc., § 395(b).

6. **Declaration of mailing (Code Civ. Proc., § 587).** A copy of this *Request for Entry of Default* was

a. **not mailed** to the following defendants, whose addresses are unknown to plaintiff or plaintiff's attorney (names):

b. **mailed** first-class, postage prepaid, in a sealed envelope addressed to each defendant's attorney of record or, if none, to each defendant's last known address as follows:

- (1) Mailed on (date): April 18, 2023
- (2) To (specify names and addresses shown on the envelopes):
Tonika Miller
5017 Colfax Ave, Apt 5
North Hollywood, CA 91601

I declare under penalty of perjury under the laws of the State of California that the foregoing items 4, 5, and 6 are true and correct.
Date: April 18, 2023

Craig Davis

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

7. **Memorandum of costs** (required if money judgment requested). Costs and disbursements are as follows (Code Civ. Proc., § 1033.5):

- a. Clerk's filing fees \$
- b. Process server's fees \$
- c. Other (specify): \$
- d. \$
- e. **TOTAL** \$ _____

f. Costs and disbursements are waived.

g. I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing item 7 is true and correct.
Date:



(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: NAME: Craig Davis (SBN 268194) FIRM NAME: Law Offices of Craig Davis STREET ADDRESS: 912 Cole Street, Suite 102 CITY: San Francisco STATE: CA ZIP CODE: 94117 TELEPHONE NO.: 415-857-5820 FAX NO.: 415-795-4595 E-MAIL ADDRESS: cdavis@craigdavislaw.com ATTORNEY FOR (name): Sara Jansohn	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94063 BRANCH NAME:	
Plaintiff/Petitioner: Lion Share Investments, LLC Defendant/Respondent: Rex Regum, LLC, et al.	
REQUEST FOR <input checked="" type="checkbox"/> Entry of Default Clerk's Judgment (Application) Court Judgment	CASE NUMBER: 19-CIV-00018
Not for use in actions under the Fair Debt Buying Practices Act (Civ. Code, § 1788.50 et seq.) (see form CIV-105)	

1. TO THE CLERK: On the complaint or cross-complaint filed
- a. on (date): **April 30, 2019** [Cross-Complaint; served 8/21/2019; POS filed on 8/29/2019]
 - b. by (name): **Sara Jane Jansohn**
 - c. Enter default of defendant (names): **Tonika Lynette Miller**

d. I request a court judgment under Code of Civil Procedure sections 585(b), 585(c), 989, etc., against defendant (names):

(Testimony required. Apply to the clerk for a hearing date, unless the court will enter a judgment on an affidavit under Code Civ. Proc., § 585(d).)

e. Enter clerk's judgment

- (1) for restitution of the premises only and issue a writ of execution on the judgment. Code of Civil Procedure section 1174(c) does not apply. (Code Civ. Proc., § 1169.)
 Include in the judgment all tenants, subtenants, named claimants, and other occupants of the premises. The *Prejudgment Claim of Right to Possession* was served in compliance with Code of Civil Procedure section 415.46.
- (2) under Code of Civil Procedure section 585(a). (Complete the declaration under Code Civ. Proc., § 585.5 on the reverse (item 5).)
- (3) for default previously entered on (date):

2. **Judgment to be entered.**

	<u>Amount</u>		<u>Credits acknowledged</u>	<u>Balance</u>
a. Demand of complaint	\$	\$	\$	\$
b. Statement of damages*				
(1) Special	\$	\$	\$	\$
(2) General	\$	\$	\$	\$
c. Interest	\$	\$	\$	\$
d. Costs (see reverse)	\$	\$	\$	\$
e. Attorney fees	\$	\$	\$	\$
f. TOTALS	\$	\$	\$	\$

g. **Daily damages** were demanded in complaint at the rate of: \$ _____ per day beginning (date): _____
 (* Personal injury or wrongful death actions; Code Civ. Proc., § 425.11.)

3. (Check if filed in an unlawful detainer case.) **Legal document assistant or unlawful detainer assistant** information is on the reverse (complete item 4).

Date: **April 18, 2023**
Craig Davis

(TYPE OR PRINT NAME)


 (SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

FOR COURT USE ONLY	(1)	Default entered as requested on (date):	
	(2)	Default NOT entered as requested (state reason):	
Clerk, by _____, Deputy			