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Superior Court of California,  
County of San Diego

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR  
THE COUNTY OF SAN DIEGO – CENTRAL DIVISION**

AMY SHERLOCK, an individual and her  
children T.S. and S.S.,

Plaintiffs,

v.

BRADFORD HARCOURT, an individual;  
EULENTHIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
NINUS MALAN, an individual; SALAM  
RAZUKI, an individual; OLIVE TREE  
PATIENTS ASSOCIATION, a California  
corporation; ALLIED SPECTRUM, INC., a  
California corporation; PRODIGIOUS  
COLLECTIVES, LLC, a limited liability  
company; and DOES 1 through 50, inclusive,

Defendants

Case No.: 37-2021-00050889-CU-AT-CTL

**Related Case Nos.:**

37-2017-00010073-CU-BC-CTL  
37-2022-0000023-CU-MC-CTL

**PLAINTIFFS' REPLY MEMORANDUM  
OF POINTS AND AUTHORITIES IN  
SUPPORT OF MOTION FOR LEAVE TO  
FILE SECOND AMENDED  
COMPLAINT**

Date: February 27, 2026  
Time: 9:00 a.m.  
Dept.: C-75

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **INTRODUCTION**

3 This motion presents a straightforward application to settled California law. Plaintiffs seek  
4 leave to file a Second Amended Complaint to incorporate newly obtained documentary evidence and  
5 sworn witness information that directly supports already viable claims for conversion, civil  
6 conspiracy, declaratory relief, and unlawful business practices. The proposed amendment does not  
7 introduce new legal theories. It does not expand the scope of the case. It does not alter the core factual  
8 narrative this Court has already found sufficient to survive demurrer. It strengthens it with  
9 documentary corroboration.

10 The new evidence consists of: (1) a 2017 conflict waiver and multi-client consent listing Amy  
11 Sherlock as a signatory; (2) ownership structure documentation for ANOMAR Management and RAB  
12 Services; (3) email communications among the alleged participants; and (4) witness statements  
13 confirming that Mrs. Sherlock’s signature on key documents was not authentic. These materials were  
14 obtained in February 2024 through an independent investigator. They provide the evidentiary  
15 foundation for specific allegations in the proposed Second Amended Complaint that documents were  
16 forged and used to effectuate post-mortem transfers of the Sherlock Property.

17 Defendant does not claim prejudice. He does not argue loss of evidence. He does not assert  
18 inability to conduct discovery. His sole objection is that Plaintiffs now possess documentary support  
19 for allegations he would prefer remain less detailed.

20 California law does not permit denial of amendment for that reason. Code of Civil Procedure  
21 sections 473 and 576 mandate liberal allowance of amendment in furtherance of justice. Denial is  
22 appropriate only where the opposing party demonstrates actual prejudice. None exists here.

23 Moreover, this Court has already recognized that Plaintiffs’ conversion and conspiracy claims  
24 state viable causes of action based on allegations of falsified documents and unlawful transfers. The  
25 proposed amendment simply aligns the pleading with the evidentiary record now in hand.

26 In short, the motion asks the Court to allow Plaintiffs to plead what the documents show. Under  
27 settled California law, the answer is yes.

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**CALIFORNIA LAW REQUIRES LIBERAL ALLOWANCE OF AMENDMENT**

Defendant’s Opposition attempts to invert California law. Code of Civil Procedure section 473(a)(1) provides that the Court may, “in furtherance of justice,” allow amendment of any pleading. Section 576 goes further, authorizing amendment “at any time before or after commencement of trial.” The case law interpreting section 473 makes the governing principle unmistakable: The statute is remedial and “should receive a liberal construction to dispose of cases upon their substantial merits.” (*Nuckolls v. Bank of California, Nat’l Assn.* (1937) 10 Cal.2d 266).

Likewise, under section 576, liberality in permitting amendment “is the rule,” and the trial court’s ruling will be upheld absent manifest abuse of discretion. (*Weingarten v. Block* (1980) 102 Cal.App.3d 129.)

More importantly, it is reversible error to deny a motion for leave to amend where amendment will not prejudice the opposing party and would permit adjudication on the merits. (*Morgan v. Superior Court* (1959) 172 Cal.App.2d 527; *Dunzweiler v. Superior Court* (1968) 267 Cal.App.2d 569.)

Lake identifies no legally cognizable prejudice. He does not claim loss of evidence. He does not claim inability to conduct discovery. He does not claim surprise that would affect trial preparation. His sole complaint is that Plaintiffs have strengthened their case. That is not legally cognizable prejudice. That is litigation.

**THE AMENDMENT IS SUPPORTED BY NEWLY OBTAINED DOCUMENTARY EVIDENCE AND WITNESS TESTIMONY**

Lake repeatedly asserts that there are “no new facts.” That assertion collapses once the Court examines how the newly obtained documentary evidence directly supports the specific causes of action pleaded in the proposed Second Amended Complaint.

**A. Evidence in the Report**

In February 2024, an independent investigator met with co-defendant Eulenthius “Duane” Alexander and obtained documentary materials that had never previously been in Plaintiffs’ possession. The investigative report documents:

- The May 5, 2017, Miltner & Menck conflict waiver letter;

- 1 • The multi-client consent signed by Lake, Bowden, Harcourt, Alexander, and purporting to
- 2 bear Amy Sherlock’s signature;
- 3 • The ANOMAR Management / RAB Services ownership structure;
- 4 • Email communications among the participants regarding the RAB agreement;
- 5 • Chain-of-custody documentation for the turnover of these materials.

6 These materials are not background color. They go to the heart of the pleaded claims.

7 **B. The New Evidence Supports the Proposed Causes of Action**

8 The new evidence is not window dressing but instead supports the proposed causes of action.

9 First, as to the **Conversion claim** (¶¶ 55–61), Plaintiffs allege that Defendants converted the Sherlock  
10 Property through forged documents and unlawful transfers. The conflict waiver and consent  
11 documents showing Amy Sherlock listed as a joint client, coupled with Alexander’s statement that her  
12 signature was not authentic, provide documentary support for the allegation in ¶¶ 33–38 and ¶ 50 that  
13 documents bearing her signature were forged and used to effectuate post-mortem transfers. Forgery of  
14 documents used to alter ownership and licensing records is not a peripheral detail. It is the mechanism  
15 of the alleged conversion.

16 Second, as to the **Civil Conspiracy claim** (¶¶ 62–70), the waiver letter and related emails  
17 demonstrate coordinated action among Lake, Harcourt, Bowden, and Alexander. The structure chart  
18 for ANOMAR and RAB Services shows the precise ownership configuration that Plaintiffs allege was  
19 manipulated to remove the Sherlock Family’s interests. This evidence directly supports ¶¶ 63–69,  
20 which allege that Lake and Harcourt acted “in concert” and used falsified documentation to effectuate  
21 transfers. Without the conflict waiver and multi-client documentation, Defendants could characterize  
22 these allegations as conjectural. With them, the SAC pleads a concrete, documentary trail tying the  
23 participants together.

24 Third, as to **Declaratory Relief** (¶¶ 72–78), the newly obtained documents support Plaintiffs’  
25 request for a declaration that all transfers post-dating Mr. Sherlock’s death are void. If documents  
26 bearing Amy Sherlock’s signature were forged and used to present ownership or agency authority to  
27 third parties, that evidence goes directly to whether the transfers were void ab initio under ¶ 74.

28 Fourth, as to the **Unfair Competition / UCL claim** (¶¶ 79–82), Plaintiffs allege that

1 Defendants filed documents with public offices based on forged materials in violation of Penal Code  
2 § 115. The conflict waiver and associated emails show the existence of documents that list Amy  
3 Sherlock as a signatory and participant in ownership structures she never agreed to. If such documents  
4 were used to support filings with municipal or state agencies, that is precisely the type of “unlawful”  
5 business practice pleaded in ¶ 80.

6 Finally, the SAC also alleges in ¶ 50 that Alexander admitted Mrs. Sherlock was an owner and  
7 that her signature on conflict waivers was forged. The February 2024 investigation is the evidentiary  
8 basis for that allegation.

9 This directly refutes the Defendant’s “no new facts” argument. It is newly obtained  
10 documentary corroboration that materially strengthens the pleaded elements of conversion,  
11 conspiracy, declaratory relief, and unfair competition.

12 Lake’s Opposition attempts to reduce these documents to irrelevance. But the SAC does not  
13 merely recite that documents exist. It pleads:

- 14 • The legal effect of forged signatures;
- 15 • The resulting voidness of post-death transfers;
- 16 • The coordinated conduct among participants;
- 17 • The unlawful filings effectuating ownership changes.

18 The February 2024 investigation supplies the factual foundation for those allegations. That is  
19 precisely why amendment is sought. To align the pleading with the documentary record.

20 California law expressly recognizes that the mere fact that some information may have existed  
21 in the abstract does not bar amendment. (*Kroplin v. Huston* (1947) 79 Cal.App.2d 332.) Amendment  
22 is particularly appropriate where it clarifies or amplifies an existing theory based on newly obtained  
23 proof. (*City of Stanton v. Cox* (1989) 207 Cal.App.3d 1557.) The proposed amendment does exactly  
24 that.

25 **DEFENDANT’S “HEARSAY” ARGUMENT IS LEGALLY MISPLACED**

26 Lake argues that portions of the Clarke declaration reference hearsay or expert opinion. That  
27 objection is premature and legally irrelevant at this stage.

28 Plaintiffs’ motion for leave to amend the complaint is not a summary judgment motion. The

1 Court does not weigh admissibility of ultimate trial evidence when determining whether amendment  
2 should be allowed. The inquiry is whether amendment is sought in furtherance of justice and whether  
3 prejudice results.

4 Courts have repeatedly held that evidentiary objections are not a basis to deny amendment.  
5 (See *Rainer v. Community Memorial Hosp.* (1971) 18 Cal.App.3d 240, recognizing flexibility under  
6 §§ 473 and 576 to prevent miscarriage of justice.)

7 If Lake believes certain testimony is inadmissible, he may test it by motion in limine or at trial.  
8 That is not a valid basis on which the Court could deny Plaintiffs’ proposed amendment.

9 **THERE HAS BEEN NO UNREASONABLE DELAY — THE CASE WAS ON APPEAL**  
10 **SEVERAL TIMES**

11 Lake’s “unreasonable delay” argument ignores the procedural record. The docket reflects that  
12 the case has been on appeal on several occasions:

- 13 • **Notice of Appeal on August 23, 2022.**
- 14 • **Notice of Appeal filed on September 1, 2022.**
- 15 • **Notice of Appeal filed on January 30, 2023.**
- 16 • **Notice of Appeal filed on July 10, 2024.**
- 17 • **Notice of Appeal filed on September 10, 2025.**

18 The appeals remained with the Court of Appeal for varying periods but for some, counted in  
19 years. The Court of Appeal formally returned jurisdiction to the Superior Court on various occasions,  
20 including November 29, 2023, July 10, 2024, and December 12, 2024.

21 While the appeal was pending, this Court lacked jurisdiction to entertain substantive  
22 amendments. The case did not simply “sit idle.” It was in the Court of Appeal. After remittitur issued  
23 and jurisdiction returned, the case resumed in the trial court. The Alexander investigation occurred in  
24 February 2024, as documented in the investigator’s report.

25 Delay attributable to appellate proceedings cannot be characterized as “unreasonable.”  
26 California courts expressly recognize that delay alone does not justify denial of leave absent prejudice.  
27 (*Nelson v. Specialty Records, Inc.* (1970) 11 Cal.App.3d 126.) Lake shows no prejudice. None exists.

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**THE COURT HAS ALREADY RECOGNIZED THE CORE TORT THEORIES**

This Court previously overruled the demurrer to conversion and civil conspiracy based on allegations that Lake and Harcourt worked together to wrongfully dispossess Plaintiffs of property interests through falsified documents. This decision is reflected in the Court’s August 19, 2022, Minute Order (attached as Exhibit A for convenience).

The SAC does not change that core theory. It strengthens it with documentary corroboration and additional factual detail. Refusing amendment would elevate procedural rigidity over substantive justice, precisely what §§ 473 and 576 were designed to prevent.

**CONCLUSION**

California law favors adjudication on the merits. Sections 473 and 576 mandate liberal allowance of amendment in furtherance of justice. The amendment here is supported by newly obtained documentary evidence, causes no prejudice, and clarifies already viable claims. Defendant’s Opposition shows no prejudice. It is an attempt to prevent the pleading from reflecting the full evidentiary record. The Motion should be granted.

DATED: February 20, 2026

KELLEY | CLARKE, PC

By: Matthew M. Clarke  
Matthew M. Clarke  
Attorneys for PLAINTIFFS

# **EXHIBIT A**

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

**MINUTE ORDER**

DATE: 08/19/2022

TIME: 09:00:00 AM

DEPT: C-75

JUDICIAL OFFICER PRESIDING: James A Mangione

CLERK: Richard Day

REPORTER/ERM: Not Reported

BAILIFF/COURT ATTENDANT: Adrian Cervantes

CASE NO: **37-2021-00050889-CU-AT-CTL** CASE INIT.DATE: 12/03/2021

CASE TITLE: **Sherlock vs Austin [EFILE]**

CASE CATEGORY: Civil - Unlimited CASE TYPE: Antitrust/Trade Regulation

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**EVENT TYPE:** Demurrer / Motion to Strike

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**APPEARANCES**

Andrew Flores, counsel, present for Plaintiff(s).

Amy Sherlock, Plaintiff is present.

Andrew Hall, counsel, present for Defendant(s) via remote audio conference.

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The Court hears oral argument and MODIFIES the tentative ruling as follows:

Defendant Steven Lake's Demurrer to Plaintiffs' First Amended Complaint is overruled in part and sustained leave to amend in part.

*Cartwright Act (First Cause of Action)*

The Cartwright Act prohibits combinations in restraint of trade. (Bus. & Prof. Code, § 16720.) Under the act, "[a]ny person who is injured in his or her business or property by reason of anything forbidden or declared unlawful by this chapter, may sue therefor . . ." (Bus. & Prof. Code, § 16750, subd. (a).) Antitrust standing is required under the Cartwright Act. (See *Kolling v. Dow Jones & Co.* (1982) 137 Cal.App.3d 709, 723.) To establish such standing, a plaintiff must show: (1) the existence of an antitrust violation with resulting harm to the plaintiff; (2) an injury of a type which the antitrust laws were designed to redress; (3) a direct causal connection between the asserted injury and the alleged restraint of trade; (4) the absence of more direct victims so that the denial of standing would leave a significant antitrust violation unremedied; and (5) the lack of a potential for double recovery." (*Vinci v. Waste Management, Inc.* (1995) 36 Cal.App.4th 1811, 1814 (footnotes removed).)

Here, Plaintiffs have not shown that the injuries caused by Defendant-the alleged theft of Mr. Sherlock's interests in the Partnership Agreement, LERE, and the Balboa and Ramona CUPs ("the Sherlock Property")-constitute the type of antitrust injury required to establish standing. Furthermore, to the extent Plaintiffs are relying on the alleged "Proxy Practice" to establish the Cartwright Act violations, they have failed to demonstrate any connection between their injuries and the Proxy Practice, as the FAC alleges that Mr. Sherlock obtained the Ramona and Balboa CUPs legally, outside of any such practice. Finally, Plaintiffs have not alleged sufficient facts to establish Defendant's participation in the Proxy Practice.

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Therefore, the demurrer on this cause of action is sustained with leave to amend.

Conversion (Second Cause of Action)

"Conversion is the wrongful exercise of dominion over the property of another. The elements of a conversion claim are: (1) the plaintiff's ownership or right to possession of the property; (2) the defendant's conversion by a wrongful act or disposition of property rights; and (3) damages." (*Lee v. Hanley* (2015) 61 Cal.4th 1225, 1240 (alterations and quotation marks omitted).) Plaintiffs allege that Defendant and Harcourt worked together to illegally obtain ownership of the Sherlock Property, which Plaintiffs were entitled to under probate law after Mr. Sherlock's death. Specifically, Plaintiffs allege that Defendant and Harcourt falsified documents dissolving LERE and transferring Mr. Sherlock's interest in the CUPs. These are personal property rights, subject to a claim of conversion. (See *Malibu Mountains Recreation, Inc. v. County of Los Angeles* (1998) 67 Cal.App.4th 359, 367–368 ("A CUP creates a property right which may not be revoked without constitutional rights of due process."); *Holistic Supplements, L.L.C. v. Stark* (2021) 61 Cal.App.5th 530, 542 ("Kersey's membership interest in the LLC was personal property belonging to her as an individual.") (citing Corp. Code, § 17701.02(r)).) Plaintiffs have sufficiently pled that Defendant wrongfully dispossessed them of their personal property rights. Therefore, the demurrer on this cause of action is overruled.

Civil Conspiracy (Third and Seventh Causes of Action)

"The elements of an action for civil conspiracy are the formation and operation of the conspiracy and damage resulting to plaintiff from an act or acts done in furtherance of the common design." (*Richard B. LeVine, Inc. v. Higashi* (2005) 131 Cal.App.4th 566, 574 (quotation marks omitted).) "There is *no separate tort* of civil conspiracy, and there is *no civil action* for conspiracy to commit a recognized tort unless the *wrongful act* itself is committed and damage results therefrom." (*Id.* (quotation marks and alterations omitted).)

Here, the third cause of action appears to allege a civil conspiracy between Defendant and Harcourt to steal the Sherlock Property. As discussed above, the FAC alleges that Defendant and Harcourt worked together to illegally obtain ownership of the Sherlock Property through, among other things, submitting falsified documents. This is sufficient to allege a civil conspiracy claim between Defendant and Harcourt. Therefore, the demurrer to this cause of action is overruled.

However, the seventh cause of action appears to be either duplicative of the third cause of action or allege Defendant was a member of the conspiracy engaged in the "Proxy Practice." As discussed above, Plaintiffs' allegations fail to tie Defendant to the alleged Proxy Practice. Therefore, the seventh cause of action is either duplicative or fails to state a claim upon which relief can be granted. Regardless, the demurrer to this cause of action is sustained without leave to amend.

Declaratory Relief (Fourth Cause of Action)

Defendant demurs to this cause of action based on the claim that Mr. Sherlock "did not have an interest in the Balboa CUP" and that Defendant did not have "an interest in LERE" or participate in its dissolution. However, this argument is directly contradicted by facts pled in the FAC, which the Court must accept as true when ruling on a demurrer. Therefore, the demurrer to this cause of action is overruled.

Unfair Competition (5th Cause of Action)

"California's unfair competition law permits civil recovery for any unlawful, unfair, or fraudulent business act or practice and unfair, deceptive, untrue, or misleading advertising. Cal. Bus. & Prof. Code § 17200. A private person may assert a UCL claim only if she (1) has suffered injury in fact and (2) has lost money

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or property as a result of the unfair competition." (*Golden State Seafood, Inc. v. Schloss* (2020) 53 Cal.App.5th 21, 39, *reh'g denied* (Aug. 6, 2020), *review denied* (Oct. 28, 2020) (citations and quotation marks omitted).) Here, Plaintiffs allege that "[t]he filing of all documents with public offices effectuating the transfer of the Sherlock Property after the death of Mr. Sherlock are based on forged documents and violate Penal Code § 115." (FAC ¶ 313.) This is sufficient to state a claim under Business and Professions Code section 17200. Therefore, the demurrer to this cause of action is overruled.

The minute order is the order of the Court.

Plaintiffs are directed to serve notice on all parties within five (5) court days.

*James A. Mangione*

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Judge James A Mangione

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

3 I am employed in the County of Collin, State of Texas. I am over the age of 18 years and not  
4 a party to this action. My business address is 603 E. Broadway Street, Prosper, Texas 75078. On  
5 February 20, 2026, I served the foregoing document described as **PLAINTIFFS' REPLY  
MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR  
LEAVE TO FILE SECOND AMENDED COMPLAINT** on the interested parties in this action:

6 **SEE ATTACHED SERVICE LIST**

7  **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I enclosed  
8 the document in a sealed envelope or package addressed to the person(s) at the address(es)  
9 above and placed the envelope(s) for collection and mailing, following our ordinary business  
10 practices. I am readily familiar with this firm's practice of collecting and processing  
11 correspondence for mailing. On the same day that correspondence is placed for collection  
12 and mailing, it is deposited in the ordinary course of business with the United States Postal  
13 Service at Highland Village, Texas, in a sealed envelope with postage fully paid.

14  **BY FACSIMILE:** The document(s) were served by facsimile. The facsimile transmission  
15 was without error and completed prior to 5:00 p.m. A copy of the transmission report is  
16 available upon request.

17 **BY OVERNIGHT DELIVERY:** The document(s) were served by overnight delivery via  
18 FedEx. I enclosed the document in a sealed envelope or package addressed to the person(s)  
19 and the address(es) above and placed the envelope(s) for pick-up by FedEx. I am readily  
20 familiar with the firm's practice of collecting and processing correspondence on the same day  
21 with this courier service, for overnight delivery.

22  **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an  
23 agreement of the parties to accept service by e-mail or electronic transmission, I caused the  
24 documents to be sent to the persons at the e-mail addresses listed above. I did not receive,  
25 within a reasonable time after the transmission, any electronic message or other indication  
26 that the transmission was unsuccessful.

27  **BY HAND DELIVERY:** The document(s) were delivered by hand during the normal course  
28 of business, during regular business hours.

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

(Federal) 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. I declare under penalty of perjury under the laws of  
the United States of America that the foregoing is true and correct.

Executed on February 20, 2026, at Prosper, Texas.



Tasha Starks

1 **SERVICE LIST**

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