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**FILED**

MAR - 9 2026

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF FRESNO  
BY \_\_\_\_\_ DEPUTY

6 Attorneys for Plaintiff CITY OF FRESNO

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF FRESNO, CENTRAL DIVISION**

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11 CITY OF FRESNO,

12 Plaintiff,

13 v.

14 ART A. TERZIAN, and DOES 1 through 100,  
15 inclusive,

16 Defendants.

Case No. 24CECG02985

[Assigned for All Purposes to the Hon. Kristi  
Culver Kapetan, Dept. 502]

**DECLARATION OF ANTHONY R.  
TAYLOR IN RESPONSE TO ORDER TO  
SHOW CAUSE RE SANCTIONS**

*{Filed Concurrently with Notice Of  
Withdrawal Of Application For Writ Of  
Assistance Pursuant To Code Of Civil  
Procedure Section 128.7(C)(2) And Request  
That Court Vacate The Order To Show Cause  
Re Sanctions}*

Date: April 14, 2026

Time: 3:30 pm

Dept: 502

Action Filed: 7/12/2024

Trial Date: 10/26/2026

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23 **DECLARATION OF ANTHONY R. TAYLOR**

24 I, Anthony R. Taylor, declare as follows:

25 1. I am an attorney duly admitted to practice before this Court. I am an equity partner  
26 of Aleshire & Wynder, LLP, attorneys of record for Plaintiff, City of Fresno (the "City") in this  
27 matter. I have personal knowledge of the facts set forth herein, except as to those stated on  
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1 information and belief and, as to those, I am informed and believe them to be true. If called as a  
2 witness, I could and would competently testify to the matters stated herein. This declaration is made  
3 in response to the Order to Show Cause re Sanctions that the Court set under Code of Civil Procedure  
4 section 128.7 for hearing on April 14, 2026 against Aleshire & Wynder LLP (“Aleshire & Wynder”)  
5 based on the improper citations in the application for writ of assistance that was prepared and signed  
6 by Carrie Raven, who was employed by Aleshire & Wynder at that time.  
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8         2. I have been licensed to practice by the State Bar of California since November  
9 2000. I have been practicing law before the Fresno Superior Court since 2014. I have never been  
10 disciplined by the State Bar of California. I have never been sanctioned by any court. I have never  
11 been admonished by any court for making any incorrect citations. I have never used ChatGBT or  
12 similar AI tools to prepare court filings. Moreover, I have given training to the litigation practice  
13 group of Aleshire & Wynder to carefully check all citations in court filings and to not use ChatGBT  
14 or similar AI tools to draft court filings.  
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16         3. In September 2025, I was diagnosed with Hodgkin’s lymphoma and I began  
17 intensive chemotherapy treatments that same month. Also, in September 2025, my partner, Michael  
18 Linden who was handling this case with me also had a major medical emergency. As such, both of  
19 the attorneys handling this case for the City had major medical emergencies occur in September  
20 2025.  
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22         4. In light of the medical emergencies that Michael Linden and I had as described above  
23 and other firm hiring needs, Aleshire & Wynder hired Carrie Raven in September 2025. I am  
24 informed and believe based on the records of the State Bar of California that Ms. Raven has been a  
25 licensed California attorney since June of 2006 with no public record of discipline. Ms. Raven had  
26 previously worked at two municipal law firms. Ms. Raven also explained during my interview of  
27 her that she handled eminent domain cases for those firms. As such, my understanding was that Ms.  
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**PROOF OF SERVICE**

**City of Fresno v. Art A. Terzian, et al.  
Fresno County Superior Court Case No. 24CECG02985**

**STATE OF CALIFORNIA, COUNTY OF RIVERSIDE**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Riverside, State of California. My business address is 3550 Vine Street, Suite 200, Riverside, CA 92507.

On March 6, 2026, I served true copies of the following document(s) described as **DECLARATION OF ANTHONY R. TAYLOR IN RESPONSE TO ORDER TO SHOW CAUSE RE SANCTIONS** on the interested parties in this action as follows:


**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Aleshire & Wynder, LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Riverside, California.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address pvasquez@awattorneys.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on Marc 6, 2026, at Riverside, California.

  
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Patricia A. Vasquez

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**SERVICE LIST**  
*City of Fresno v. Art A. Terzian, et al.*  
**Fresno County Superior Court Case No. 24CECG02985**

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*Attorneys for Defendants*  
ART A. TERZIAN and AVEDIS A.  
TERZIAN, as Trustee of Garnett  
Investment Trust Dated 8-8-85

***[By E-Mail Only]***

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*Attorneys for Defendant,*  
CALIFORNIA DEPARTMENT OF  
TAX AND FEE ADMINISTRATION

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***[By Mail Only]***

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*Doe Defendant 3*

***[By Mail Only]***

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*Doe Defendant 4*

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