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Attorneys for Respondent
FRANK C. CARSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF STANISLAUS

In the Matter of the Assumption of
Jurisdiction over the Law Practice of

FRANK C. CARSON
No. 136261

Case No. 2016630

**DECLARATION OF JOHN
HILLENBRAND IN OPPOSITION TO
APPLICATION FOR ASSUMPTION OF
JURISDICTION OVER LAW PRACTICE**

FILED
2015 SEP -1 PM 3: 29
CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS
R. DeRiviter

1 I, JOHN HILLENBRAND, declare as follows:

2 1. I am an attorney licensed to practice law in California. Unless otherwise stated, I
3 make this declaration based on my personal knowledge and could and would testify to the facts
4 stated herein.

5 2. I became licensed to practice law in California in 2000. I was admitted in New
6 York and Connecticut earlier the same year.

7 3. In 2001 I was a Deputy District Attorney in Stanislaus County. Since 2002 my
8 practice has been devoted exclusively to criminal law in both State and Federal Court, throughout
9 the State of California.

10 4. I have agreed to represent Frank Carson's clients while he is incarcerated, and to
11 the extent necessitated by Mr. Carson's defense in his criminal case thereafter.

12 5. I am informed and believe that attorney Ryan Roth is also representing some of
13 Mr. Carson's clients.

14 6. I have met with some of Mr. Carson's clients to explain the circumstances and
15 seek their consent to my representation. Each of the clients with whom I have met has signed a
16 consent to be represented by Mr. Carson with the assistance of myself and/or Mr. Roth. Consents
17 executed by the clients with whom I have met are attached hereto as Exhibit A.

18 7. Prior to Mr. Carson's arrest I would regularly meet with him to review and plan
19 for events in cases. As a result, when he was arrested, I was already familiar with many of the
20 pending matters in his office.

21 8. Since Mr. Carson's arrest, I have met with him regularly, sometimes more than
22 once a day, to discuss his clients' matters. Together, we address upcoming events in those
23 matters and prepare strategy. He has expressed to me and his clients confidence in my ability to
24 represent them in his absence.

25 9. I see and communicate with Mr. Carson's legal assistant, Jessica Duran, as well as
26 Mr. Roth, several times a day. We review open matters and review coverage for upcoming
27 hearing dates. In these meetings I review Mr. Carson's instructions regarding case management
28 and disposition.

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10. Ms. Duran provides a daily calendar of matters requiring court appearances, office appointments or other actions and distributes these to me and Mr. Roth.

11. I have appeared in court in several of Mr. Carson's cases to seek continuances due to his unavailability. I have obtained continuances in three cases. In every instance, the judge granted a continuance.

12. The phone is answered in Mr. Carson's office and I am aware that messages are being returned. An investigator employed by Mr. Carson, Jack Able, continues to work on his client matters and I am informed and believe discovery in those matters is ongoing.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Declaration was executed on August 27th, 2015 at Modesto, California.


JOHN HILLENBRAND