

FILED

2015 SEP -1 PM 3: 28

COURT OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS

BY: R. DeRuiter DEPUTY

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13 FRANK C. CARSON

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF STANISLAUS

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

Case No. 2016630

**DECLARATION OF RYAN ROTH IN  
OPPOSITION TO APPLICATION FOR  
ASSUMPTION OF JURISDICTION OVER  
LAW PRACTICE**

18 FRANK C. CARSON  
19 No. 136261

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

7 3. I am informed and believe that attorney John Hillenbrand is also representing  
8 some of Mr. Carson's clients.

9 4. I have met with many of Mr. Carson's clients to explain the circumstances and  
10 seek their consent to my representation. Each of the clients with whom I have met has signed a  
11 consent to be represented by Mr. Carson with the assistance of myself and/or Mr. Hillenbrand.  
12 Consents executed by the clients with whom I have met are attached hereto as Exhibit A.

13 5. I have been receiving instructions from Mr. Carson regarding cases in which I am  
14 representing his clients. With his supervision I have been working on resolving pending matters.  
15 Yesterday, I successfully obtained the dismissal of *People v. Scroggins* Case No.1485335.

16 6. I meet several times a day with Mr. Carson's legal assistant, Jessica Duran, as well  
17 as Mr. Hillenbrand, to review open matters and review coverage for upcoming hearing dates. In  
18 these meetings I review with Mr. Hillenbrand, Mr. Carson's instructions regarding case  
19 management and disposition.

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

22 8. I have appeared in court in several of Mr. Carson's cases to seek continuances due  
23 to his unavailability. I have obtained continuances in at least eight cases. There has been no  
24 instance in which a judge has denied my continuance request.

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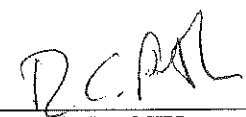
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9. The phone is answered in Mr. Carson's office and I am aware that messages are being returned. An investigator employed by Mr. Carson, Jack Able, continues to work on his client matters and I am informed and believe discovery in those matters is 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 27, 2015 at Modesto, California.

  
\_\_\_\_\_  
RYAN ROTH