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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

In the matter of:

The Second Amended and Restated George
Saadian Revocable Living Trust, as amended
and restated.

Defendant.

Case No. 23STPB12471

[Assigned to the Hon. Ruben Garcia, Dept. 9]

**DECLARATION OF BOBBY SAADIAN IN
SUPPORT OF OPPOSITION TO MOTION
TO COMPEL COMPLIANCE WITH
SUBPOENA**

Date: August 27, 2026

Time: 9:30 a.m.

Place: Dept. 9

DECLARATION OF BOBBY SAADIAN

I, Bobby Saadian, declare, as follows:

1. I am an attorney duly licensed to practice law in the State of California. The matters set forth in this declaration are based on my personal knowledge, and if called to testify, I could and would testify competently thereto.

2. I make this declaration in support of my Opposition to the Trustee's Motion to Compel my Deposition (the "Motion").

3. I am a cousin of the parties in this litigation, including Petitioner Jonah Saadian, Brandon Saadian, and Trustee Matthew Barkohanai. I have no connection with The Second Amended and Restated George Saadian Revocable Living Trust (the "Trust").

4. More specifically, I am not a trustee, beneficiary, successor trustee, or party to the Trust, nor am I a party to this litigation or any of the related proceedings. I have no role whatsoever in the Trust, its creation, its amendment, or its administration.

5. I have no financial interest or stake in the Trust or its administration. Indeed, I stand to receive nothing from the Trust regardless of how this dispute is resolved. The outcome of this litigation has no bearing on any of my financial interests.

6. I am not funding, nor have I ever funded, Jonah Saadian's or Brandon Saadian's litigation against the Trustee in this matter or in any related proceeding. I have never provided any funds, directly or indirectly, to finance any legal proceedings related to the Trust or any other litigation involving Matthew Barkohanai. The text message attached to Barkohanai's Declaration in support of the Motion was simply an empty threat made in the midst of a family/business dispute between Matthew Barkohanai and me. (Barkohanai Decl., Exhibit I.)

7. I have not contributed to, promised to contribute to, or agreed to contribute to the payment of any attorneys' fees, costs, or expenses in connection with Jonah Saadian's Petition, Brandon Saadian's participation in these proceedings, or any other related proceeding. No such arrangement, whether written, oral, or implied, exists or has ever existed.

8. I acknowledge that I sent text messages to Trustee Matthew Barkohanai on or about November 11, 2024, and November 14, 2024. Again, as is very clear from the context of

1 those texts (which Barkohanai’s counsel clearly cherry-picked), those statements were made in
2 the heat of the moment during a family dispute and were not serious or actionable threats.
3 They were expressions of frustration, nothing more.

4 9. That frustration arose primarily from a separate, unrelated real estate dispute
5 between the Trustee and me. More specifically, the Trustee claims that I owe him a sales
6 commission in connection with a building that I purchased. That is indisputably false and the
7 situation had come to a head, which those texts reflect.

8 10. That unrelated personal dispute was the catalyst for the text messages, not any
9 involvement in, or knowledge of, the Trust litigation. My statements in those messages should
10 be understood in that context. Indeed, in one of the only texts that the Trustee attaches to his
11 Declaration in support of the Motion, I clearly state, “You have already damaged my family
12 relationship with you. I’m very disappointed in your behavior.” (Barkohanai Decl., Exhibit
13 H.)

14 11. I have conducted a reasonable and diligent search of my files, records,
15 electronic devices, and email accounts. Based on that search, I do not possess any documents
16 responsive to the requests for production of documents attached to the deposition subpoena at
17 issue here, much less any documents that would have any relevance to this case.

18 12. Further, to the extent that the Trustee would like any text messages between us,
19 he already has them in his possession. In addition, if he wants text messages from Jonah
20 Saadian, he could have gotten them from Jonah in discovery in the last nine months since he
21 filed the Motion.

22 13. I do not have any communications relating to the Petition, the administration of
23 the Trust accountings, Trust distributions, or the specific real properties identified in the
24 document requests. The only communications I have had with family members concerning the
25 Trust or the parties to this litigation are of a purely personal family nature and bear no
26 relevance to the Trust litigation or its subject matter.

27 14. I believe that the Trustee’s deposition subpoena and this motion to compel are
28 not motivated by any legitimate need for discovery. Rather, they are motivated by the Trustee

1 Matthew Barkohanai's personal animus toward me arising from our separate, above-referenced
2 unrelated real estate commission dispute. The Trustee is misusing the discovery process in this
3 Trust litigation as a vehicle to harass me and to gain leverage in our personal dispute.

4 15. Sitting for a deposition would impose a significant and undue burden on me. As
5 the founding partner and CEO of Wilshire Law Firm, PLC, I have substantial daily obligations
6 to my employees, attorneys, and clients. The burden of taking the time for this deposition far
7 outweighs any possible benefit to this litigation, given that I possess no relevant knowledge
8 concerning the Trust or its administration and no documents responsive to the subpoena. The
9 purpose is simply to harass me.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct, and that this declaration was executed on August 13, 2026, at Los
12 Angeles, California.

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15 Bobby Saadian
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 660 S. Figueroa St., Sky Lobby Los Angeles, CA 90017.

On August 14, 2026, I served **DECLARATION OF BOBBY SAADIAN IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL COMPLIANCE WITH SUBPOENA** on all interested parties in this action as set forth on the attached service list in the following manner:

☐ **BY MAIL:** I am familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

☐ **BY FACSIMILE:** In addition to service by mail as set forth above, a copy of said document(s) was also delivered by facsimile transmission to the addressee(s) pursuant to Code of Civil Procedure §1013(e).

☐ **BY OVERNIGHT MAIL:** I caused said document(s) to be picked up via FEDERAL EXPRESS for delivery to the addressee(s) set forth on the attached service list on the next business day.

☐ **BY PERSONAL SERVICE:** I caused said document(s) to be delivered via personal delivery to the addressee(s) set forth on the attached service list.

☒ **BY ELECTRONIC SERVICE:** Pursuant to the agreement of the parties, I caused said document(s) to be delivered via electronic mail to the addressee(s) set forth on the attached service list.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ **FEDERAL:** I declare that I am employed in the office of the member of the bar of this court at whose direction the service was made.

Executed on August 14, 2026, at Los Angeles, California.

FABIOLA COVARRUBIAS

SERVICE LIST

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