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12 JILL PRICE

13 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CRUZ  
14 CIVIL – UNLIMITED JURISDICTION

16 MICHAEL PRICE, JILL PRICE, and EMMA  
17 LACE PRICE by and through her successors-in-  
interest MICHAEL PRICE and JILL PRICE,

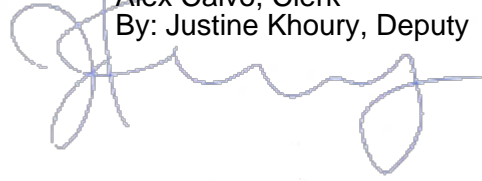
18 Plaintiffs,

19 v.

20 MICHAEL J. RUSSELL, PRICILLA ANN  
RUSSELL, MICHAEL B. RUSSELL, and  
21 DOES 1-10,

22 Defendants.

ELECTRONICALLY FILED  
Superior Court of California  
County of Santa Cruz  
8/5/2022 10:35 AM  
Alex Calvo, Clerk  
By: Justine Khoury, Deputy



Case No. 22CV01679

**COMPLAINT FOR DAMAGES**

**Wrongful Death and Survival Action**

Negligence, Strict Liability, Sexual Battery  
(Statutory Rape), Battery (Administering  
Drugs)

CCP §377.60, §377.30

23  
24 COMES NOW MICHAEL PRICE and JILL PRICE, parents of Decedent EMMA LACE  
25 PRICE, and allege against Defendants MICHAEL J. RUSSELL, PRICILLA RUSSELL, MICHAEL  
26 B. RUSSELL, and DOES 1-10, as follows:

27 //

28 //



















# Exhibit A





1 LESLEY HARRIS (SBN 124248)  
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LACE PRICE by and through her successors-in-  
17 interest MICHAEL PRICE and JILL PRICE,

18 Plaintiffs,

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20 MICHAEL\_\_\_ RUSSELL, PRICILLA ANN  
RUSSELL, MICHAEL B. RUSSELL, and  
21 DOES 1-10,

22 Defendants.

Case No.

**DECLARATION OF JILL PRICE,  
DECEDENT'S SUCCESSOR IN  
INTEREST**

23  
24 I, JILL PRICE, declare as follows:

- 25 1. The decedent is my daughter, Emma Lace Price.
- 26 2. Plaintiff Michael Price and I commenced this action by filing the Complaint to which  
27 this Declaration is attached.
- 28 3. On November 12, 2021, decedent Emma Lace Price was pronounced dead of an acute  
drug overdose.

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4. No proceeding is now pending in California for administration of the decedent's estate.

5. Plaintiff Michael Price and I are the decedent's successor in interest, as defined in Code Civ. Proc., § 377.11, and succeeded to the decedent's interest in the survival action.

6. No other person has a superior right to commence the action or to be substituted for the decedent in the pending action.

7. I, JILL PRICE, have personal knowledge of the matters contained in this declaration and, if called as a witness to testify, I could and would competently testify to them.

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

Date: \_\_\_\_\_  
Plaintiff Jill Price