

EXHIBIT 111

Substitution of Attorney, San Diego Superior Court (No.
37-2022-00026691)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): D. Edward Hays (SBN 162507) Marshack Hays Wood LLP 870 Roosevelt Irvine, CA 92620 TELEPHONE NO.: (949) 333-7777 FAX NO. (Optional): (949) 333-7778 E-MAIL ADDRESS (Optional): ehays@marshackhays.com ATTORNEY FOR (Name): Petitioners Tyler Davis and TopDevz, LLC	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Diego 10/14/2025 6:13:53 PM Clerk of the Superior Court By R. Stille , Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: Same CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Hall of Justice	
CASE NAME: Tyler Davis, et al. v. Ashkan Rajaei, et al.	
SUBSTITUTION OF ATTORNEY—CIVIL (Without Court Order)	CASE NUMBER: 37-2022-00026691-CU-PA-CTL

THE COURT AND ALL PARTIES ARE NOTIFIED THAT (name): Tyler Davis and TopDevz, LLC makes the following substitution:

- Former legal representative** ☐ Party represented self ☒ Attorney (name): Scott R. Carpenter
- New legal representative** ☐ Party is representing self* ☒ Attorney
 - Name: D. Edward Hays
 - State Bar No. (if applicable): 162507
 - Address (number, street, city, ZIP, and law firm name, if applicable): Marshack Hays Wood LLP, 870 Roosevelt, Irvine, CA 92620
 - Telephone No. (include area code): (949) 333-7777
- The party making this substitution is a ☐ plaintiff ☐ defendant ☒ petitioner ☐ respondent ☐ other (specify):
 Petitioners Tyler Davis and TopDevz, LLC

***NOTICE TO PARTIES APPLYING TO REPRESENT THEMSELVES**

- Guardian • Personal Representative • Guardian ad litem
- Conservator • Probate fiduciary • Unincorporated
- Trustee • Corporation association

If you are applying as one of the parties on this list, you may NOT act as your own attorney in most cases. Use this form to substitute one attorney for another attorney. SEEK LEGAL ADVICE BEFORE APPLYING TO REPRESENT YOURSELF.

NOTICE TO PARTIES WITHOUT ATTORNEYS

A party representing himself or herself may wish to seek legal assistance. Failure to take timely and appropriate action in this case may result in serious legal consequences.

4. I consent to this substitution.

Date: October 3, 2025

Tyler Davis and on behalf of TopDevz, LLC

(TYPE OR PRINT NAME)

► 
 (SIGNATURE OF PARTY)

5. ☒ I consent to this substitution.

Date: October 3, 2025

Scott R. Carpenter

(TYPE OR PRINT NAME)

► 

(SIGNATURE OF FORMER ATTORNEY)

6. ☒ I consent to this substitution.

Date: October 3, 2025

D. Edward Hays

(TYPE OR PRINT NAME)

► 

(SIGNATURE OF NEW ATTORNEY)

(See reverse for proof of service by mail)

CASE NAME:

Tyler Davis, et al. v. Ashkan Rajaei, et al.

CASE NUMBER:

37-2022-00026691-CU-PA-CTL

PROOF OF SERVICE BY MAIL
Substitution of Attorney—Civil

Instructions: After having all parties served by mail with the Substitution of Attorney—Civil, have the person who mailed the document complete this Proof of Service by Mail. An unsigned copy of the Proof of Service by Mail should be completed and served with the document. Give the Substitution of Attorney—Civil and the completed Proof of Service by Mail to the clerk for filing. If you are representing yourself, someone else must mail these papers and sign the Proof of Service by Mail.

1. I am over the age of 18 and **not a party to this cause**. I am a resident of or employed in the county where the mailing occurred. My residence or business address is (*specify*):
2. I served the Substitution of Attorney—Civil by enclosing a true copy in a sealed envelope addressed to each person whose name and address is shown below and depositing the envelope in the United States mail with the postage fully prepaid.

(1) Date of mailing: 10/14/2025

(2) Place of mailing (*city and state*): Irvine, CA

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

Date: October 14, 2025

Layla Buchanan

(TYPE OR PRINT NAME)



(SIGNATURE)

NAME AND ADDRESS OF EACH PERSON TO WHOM NOTICE WAS MAILED

4. a. Name of person served: Ashkan Rajaei
- b. Address (*number, street, city, and ZIP*): 1968 S. Coast Highway, Suite 3550, Laguna Beach, CA 92651
- c. Name of person served: Cummins & White, LLP - Scott R. Carpenter
- d. Address (*number, street, city, and ZIP*): 2424 S.E. Bristol Street, Suite 300, Newport Beach, CA 92660
- e. Name of person served: Law Offices of Joseph W. Scalia, APC
- f. Address (*number, street, city, and ZIP*): 1620 Lead Hill Boulevard, Roseville, CA 95661
- g. Name of person served: Kirk & Toberty - J. Douglas Kirk
- h. Address (*number, street, city, and ZIP*): 2201 Dupont Drive, Suite 820, Irvine, CA 92612
- i. Name of person served:
- j. Address (*number, street, city, and ZIP*):

☐ List of names and addresses continued in attachment.