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15  
16 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
17 COUNTY OF ALAMEDA

18  
19 THE PEOPLE OF THE STATE OF  
20 CALIFORNIA,  
21 Plaintiff,  
22 v.  
23 HEARTBEAT INTERNATIONAL, INC., and  
24 REALOPTIONS, INC.,  
25 Defendants.

Case No.: 23CV044940

**DECLARATION OF ERIKA CARRILLO  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

1 I, Erika Carrillo, declare and state as follows:

2 1. I am a former patient of RealOptions, Inc. who received Abortion Pill Reversal  
3 treatment there. I am submitting this declaration in support of Heartbeat International's and  
4 RealOptions' motion for summary judgment or, alternatively, summary adjudication. I am over 18  
5 years of age and competent to submit this testimony. All of the matters discussed below are based  
6 on my own personal knowledge and experience.

7 2. My world was turned inside out roughly nine years ago when I learned I was  
8 unexpectedly pregnant. I was just a few years out of high school, with some college but no college  
9 degree, and felt intense external pressure to abort my child. Not sure of what other options I might  
10 have, I scheduled an appointment for an abortion and took the first pill I was given to cause that  
11 abortion.

12 3. I almost immediately regretted my decision and, agonizing over it at home that  
13 night, I got online to search for a way to reverse the effects of the first pill before it killed my child.  
14 I came across a website. I can't remember what website it was, given the passage of time, but it  
15 sparked a little flame of optimism that all hope was not yet lost. I realized that there might be a  
16 chance that my baby was still alive and that there was something I could do to increase the odds  
17 that he or she would stay alive until the first abortion drug wore off.

18 4. The website had a phone number I could call for more information. I called it and  
19 left a message. When I was called back, I described my plight and desire to save my baby, and the  
20 person on the other end of the line sprang into action to find a clinic close to where I then lived in  
21 East Palo Alto that could see me right away and that might be able to help.

22 5. The provider I was put into contact with was RealOptions. I called the RealOptions  
23 clinic and was given an appointment for later that day. At the appointment, I was given a pregnancy  
24 test to confirm my pregnancy and an ultrasound to confirm that my baby was still alive. I then  
25 began to receive supplemental progesterone, first as an injection and later as suppositories I picked  
26 up at no cost from a local pharmacy.

27 6. The immediate emergency soon subsided—my baby survived the first abortion drug  
28 and my pregnancy continued. But I kept going to RealOptions for prenatal care in the subsequent

1 months before I gave birth. Some of that care was redundant: I had a separate prenatal care  
2 provider, but I knew RealOptions cared about my baby and me. So, when I'd get scared—*I haven't*  
3 *felt my baby move for a while!*—I'd call RealOptions up for reassurance and to get a new  
4 ultrasound to confirm everything with my pregnancy still was okay.

5 7. I later gave birth to a little boy. He had no birth defects, and I myself had no  
6 complications from the abortion pill reversal treatment that had increased his chances of survival.  
7 My son will be celebrating his ninth birthday soon; I am amazed by the little man he's become and  
8 can't wait to see him live up to his great promise in the years to come.

9 8. I am eternally grateful to RealOptions for the gift of my son's life and for aiding me  
10 when I thought all was lost after I had buckled under intense pressure from others to kill my child.  
11 Although I am not in a position to donate to RealOptions or to actively volunteer for it given the  
12 competing demands on my time as a mom of a rambunctious little boy and as an assistant property  
13 manager at the Chinatown Community Development Center, I told my story in a video for  
14 RealOptions that is posted on YouTube to get the word out to other moms in need who might think  
15 they have nowhere to turn.



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24 *Figure 1: Baby Carrillo*

25 I declare under penalty of perjury under the laws of the United States and the State of  
26 California that the foregoing is true and correct. Executed on January 16, 2026, in San Mateo,  
27 California.

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Erika Carrillo