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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 CYNTHIA MICHEL  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

1 I, Cynthia Michel, declare and state as follows:

2 1. I received Abortion Pill Reversal treatment at a pregnancy help clinic in California  
3 approximately 15 years ago. I am submitting this declaration in support of Heartbeat International  
4 and RealOptions' motion for summary judgment or, alternatively, summary adjudication. I am over  
5 18 years of age and competent to submit this testimony. All of the matters stated below are based  
6 on my own personal knowledge and experience, and I could and would be competent to testify to  
7 the facts stated herein if called as a witness in this case.

8 2. I am a resident of San Diego County, California. In or around 2014, I received a  
9 Bachelor's degree in Political Science from San Diego State University. I am currently employed as  
10 a contracts manager for an engineering firm. I have never been employed by, compensated by, or  
11 volunteered with, Heartbeat International, Inc. ("Heartbeat") or RealOptions, Inc. ("RealOptions").

12 3. Approximately fifteen years ago, when I was 19, I had an unplanned pregnancy. I  
13 first visited a Planned Parenthood to confirm that I was pregnant through a pregnancy test. Planned  
14 Parenthood did not perform an ultrasound. I believe I was in my sixth or seventh week of  
15 pregnancy at the time.

16 4. I then obtained the first abortion pill, mifepristone, at a non-Planned Parenthood  
17 facility in the San Diego area. At this appointment, the facility performed an ultrasound, but I was  
18 not allowed to see the screen, even after I specifically asked to see it. I did not fully understand the  
19 abortion pill, how it worked, or the process involved, when I first received and took it.

20 5. Shortly after taking mifepristone for the first time, I experienced profound emotional  
21 distress and regret. Before experiencing regret at taking mifepristone, I had no knowledge of APR,  
22 had not searched for it online, and did not view or rely on any APR websites, advertisements, or  
23 promotional materials.

24 6. After I expressed regret to my mother, she then told a priest, who came to speak  
25 with me because I was so upset. The priest connected me with individuals associated with Culture  
26 of Life Family Services, which led to my speaking with Dr. George Delgado. This referral occurred  
27 through personal contact, not through advertising or solicitation.

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1           7.     Dr. Delgado explained to me that progesterone might counteract the effects of the  
2 first abortion pill, but he clearly stated that there were no guarantees and that the outcome was  
3 uncertain. He made no promises of success or certainty about APR's effectiveness.

4           8.     Before proceeding with progesterone treatment, I contacted the facility from which I  
5 had received the abortion pill as well as a Planned Parenthood facility. Those providers told me that  
6 not taking the second abortion pill could result in serious complications and/or fetal deformities and  
7 that my pregnancy was likely not viable.

8           9.     After speaking with the Planned Parenthood facility and the facility at which I had  
9 received the abortion pill, I visited Dr. Delgado's clinic. This was the day after I took the first  
10 abortion pill. At his clinic, I received an ultrasound that showed a fetal heartbeat. Seeing this  
11 heartbeat was the primary reason I decided to attempt APR and continue my pregnancy.

12          10.    I received progesterone by injection at Dr. Delgado's clinic approximately 24 hours  
13 after taking the abortion pill. I continued receiving progesterone injections and was monitored by  
14 Culture of Life Family Services, and my progesterone levels were monitored through blood tests at  
15 Labcorp. I continued these treatments until my progesterone levels stabilized, which occurred  
16 around my first trimester.

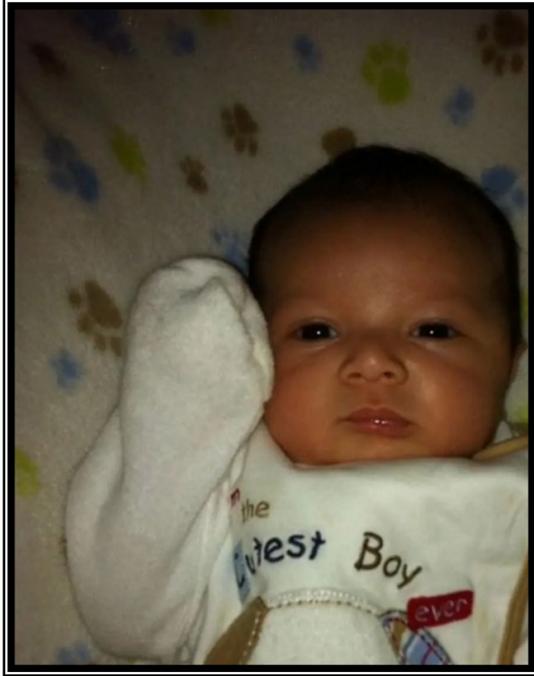
17          11.    Neither Dr. Delgado nor Culture of Life charged me for the progesterone treatments  
18 or my related care, and I do not recall giving them my health insurance information. I also paid no  
19 money to either Heartbeat International or RealOptions.

20          12.    Following the progesterone treatments, I received standard prenatal care through my  
21 health insurance provider. My pregnancy progressed normally, and I ultimately gave birth to a  
22 healthy baby boy, who is now 14 years of age.

23          13.    Many years later, I asked and was allowed to share my personal experience at a  
24 Culture of Life Family Services fundraising event. I have also shared my personal experience in  
25 media interviews as well as in a speech at a San Diego Walk for Life event. I was not paid for  
26 speaking at these events, and I was not directed, coached, or scripted by any defendant or affiliated  
27 organizations about what I should say.

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1           14.     I am now the proud mother of three children, including the son I almost aborted. I  
2 am extremely grateful to Dr. Delgado for the care he provided me.

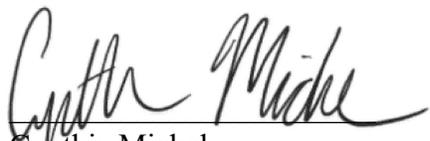


15                     *Figure 1: Baby Michel*



15                     *Figure 2: Now-teenaged "Baby" Michel*

16           I declare under penalty of perjury under the laws of the United States and the State of  
17 California that the foregoing is true and correct. Executed on January 18, 2026, in San Diego,  
18 California.

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20                                       
21                                     Cynthia Michel

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