

1 Charles S. LiMandri, SBN 110841
 2 cslimandri@limandri.com
 3 Paul M. Jonna, SBN 265389
 4 pjonna@limandri.com
 5 Jeffrey M. Trissell, SBN 292480
 6 jtrissell@limandri.com
 7 Brian M. McPherson, SBN 345196
 8 bmcpherson@limandri.com
 9 LiMANDRI & JONNA LLP
 10 P.O. Box 9120
 11 Rancho Santa Fe, CA 92067
 12 Telephone: (858) 759-9930
 13 Facsimile: (858) 759-9938

9 Peter Breen, *pro hac vice*
 10 pbreen@thomasmoresociety.org
 11 THOMAS MORE SOCIETY
 12 309 W. Washington St., Ste. 1250
 13 Chicago, IL 60606
 14 Telephone: (312) 782-1680

13 *Attorneys for Defendants Heartbeat*
 14 *International, Inc. & RealOptions, Inc.*

Andrew S. Hollins, SBN 80194
 ahollins@messner.com
 Ethan A. Reimers, SBN 311020
 ereimers@messner.com
 MESSNER REEVES LLP
 650 Town Center Drive, Suite 700
 Costa Mesa, CA 92626
 Telephone: (949) 612-9128
 Facsimile: (310) 889-0896

Attorneys for Defendant RealOptions, Inc.

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

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 NAJIA
 MAYBERRY (NAJERA) IN SUPPORT
 OF DEFENDANTS' MOTION FOR
 SUMMARY JUDGMENT**

1 I, Najia Mayberry (Najera), declare and state as follows:

2 1. I received Abortion Pill Reversal treatment in California in 2023. I am submitting this
3 declaration in support of Heartbeat International’s and RealOptions’ motion for summary judgment
4 or, alternatively, summary adjudication. I am over 18 years of age and competent to submit this
5 declaration. All of the matters discussed below are based on my own personal knowledge and
6 experience, and I could and would be competent to testify to the facts stated herein if called as a
7 witness in this case.

8 2. I am currently enrolled at Merced Junior College studying child development and
9 early childhood education. I have never been employed by, or volunteered with, either Heartbeat
10 International or RealOptions. In the past, I volunteered with Alpha Pregnancy Center, but I have no
11 knowledge of whether it currently offers, or has ever offered, Abortion Pill Reversal.

12 3. In September 2023, I went to FPA Women’s Health in Modesto, California, to obtain
13 a medication abortion after previously confirming I was pregnant through a pregnancy test at the
14 Planned Parenthood in Merced. FPA Women’s Health told me I was approximately eight weeks
15 pregnant based on the ultrasound it performed.

16 4. At the time, I was very apprehensive about my pregnancy because the father of my
17 unborn child left me when he learned I was pregnant, and I was concerned about surviving as a young
18 unwed mother on my own.

19 5. During my appointment with FPA Women’s Health, I received the abortion pill and
20 took the first pill in the presence of the provider. Before taking the pill, the provider warned me about
21 its potential side effects, including vomiting, cramping, and bleeding. The provider also told me that
22 I absolutely had to later take the four misoprostol pills and that I could not “reverse” the abortion if
23 I changed my mind.

24 6. At FPA Women’s Health, I was told that my baby was just a “clump of cells” and that
25 I could always “make another one” if I would just “sling around more sperm and more eggs.” I felt
26 pressure from the provider to choose abortion. I was additionally told that I needed to schedule a
27 follow up appointment because I might need a dilation and curettage to remove any parts of my
28 unborn child that remained in my uterus after taking the course of drugs. FPA Women’s Health also

1 gave me a photo from the ultrasound performed on me, which showed my unborn son. But seeing
2 this photo made me realize my baby was not simply a “clump of cells.”

3 7. Almost as soon as I left FPA Women’s Health, I felt overwhelming guilt, hopelessness,
4 depression, and regret. I looked at the ultrasound picture of my baby multiple times that day. I spoke
5 with my mother and other family and immediately began searching the Internet to see if I could
6 reverse the effects of the first pill I had taken. At the time, I did not know about abortion pill reversal;
7 I was simply searching for any alternative because I no longer wanted to go through with aborting
8 my unborn child. In conducting my search, I eventually came across a website for the APR Network,
9 which had a 24-hour hotline to call for help. I instantly felt a sense of hope and gratitude.

10 8. Once I found the number for the hotline, I called it and was able to speak with a nurse
11 for between thirty minutes to an hour. She discussed the APR process with me, including the
12 possibility that it may not be effective at saving my baby. I did not have any further contact with the
13 nurse from the APR Network or the hotline other than a follow up email thanking me for the call and
14 providing some general information. Thanks to this call, I felt immediate relief because I now had
15 potential options to choose life for my unborn son.

16 9. After my conversation with the nurse who answered my call to the 24-hour hotline, I
17 was then contacted by a physician in Modesto affiliated with the APR Network, who prescribed me
18 progesterone and scheduled an in-office appointment. Both the physician and the pharmacist at
19 Walgreen’s, where I picked up my prescription, warned me about the possible side effects of
20 progesterone. I took the course of progesterone, as prescribed, and had at least one more follow-up
21 appointment with this physician. I never had to pay for any of these appointments with this
22 physician’s office.

23 10. My decision to take progesterone was a completely well-informed decision that I
24 knowingly and freely made. In contrast to the treatment I received at FPA Women's Health, the
25 physician referred to me by the APR Network made me feel respected and reassured and did not
26 pressure me to make a certain decision.

27 11. For the remainder of my pregnancy, my treating OB/GYN was Dr. Laurie Mata. She
28 had no connection with the APR Network. I told her about how I had taken progesterone to save my

1 pregnancy, and she said she was happy I decided to keep my unborn child. She did not tell me that
2 taking progesterone would cause any disabilities or complications, and she confirmed my son was
3 healthy in utero.

4 12. On May 9, 2024, I gave birth to my son. There were no complications with my
5 delivery, and he was completely healthy with no birth defects.

6 13. I did not have pay anything for my APR treatment. I have never donated money to
7 either Heartbeat International or RealOptions, and I have never been asked to share my experience
8 publicly prior to being deposed in this case.

9 14. APR saved the life of my unborn son. I am incredibly grateful to the APR Network
10 and others who provide this lifesaving service, and I am thankful I had the ability to choose life for
11 my unborn child.



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23 *Figure 1: Baby Najera*

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

27
28
Signed by:
Najia Mayberry
8C2A612B11F54E8...
Najia Mayberry (Najera)