

1 John T. Hranek, Esq. State Bar No. 176300
2 31165 Temecula Parkway, Ste. 351
3 Temecula, CA 92592
4 TELEPHONE (916) 244-1640
5 FAX (888) 402-2710
6 E-Mail: lawyerjth@gmail.com

7 Attorney for Petitioners Marat Gabdullin and
8 Aigerim Bimoldina

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 IN AND FOR THE COUNTY OF ORANGE

11 MARAT GABDULLIN and AIGERIM
12 BIMOLDINA, individually and as Parents
13 and proposed or duly appointed Guardians
14 ad Litem of AILIN MARAT
15 GABDULLINA, a Minor,
16 Plaintiffs,

17 v.

18 RADY CHILDREN'S HEALTH ORANGE
19 COUNTY dba CHOC; CHILDREN'S
20 HOSPITAL OF ORANGE COUNTY; and
21 DOES 1 through 50, inclusive,
22 Defendants.

Case No.: 30-2026-01580246-CL-MC-CXC

SUPPLEMENTAL DECLARATION OF
MINOR'S PARENTS IN SUPPORT OF EX
PARTE APPLICATION FOR TEMPORARY
RESTRAINING ORDER

[CRC 3.1200–3.1207; CCP § 527]

Judge: Hon. Corey S. Cramin

Date: July 1, 2026

Dept: CX104

Time: 9:00 a.m.

23 MARAT GABDULLIN and AIGERIM BIMOLDINA, individually and as Parents and Guardians
24 ad Litem of AILIN MARAT GABDULLINA, a Minor, hereby submit the following declarations
25 in support of their minor daughter.

26 July 1, 2026

Respectfully Submitted,

/s/John T. Hranek, Esq.



- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

3
4

6
7
8
9

11

13

15
16
17

18
19
20

22

24

26

27

28

1
2 8. Despite repeated requests, we did not receive complete hospitalization records covering June 7
3 through June 30. We had only limited information available through MyChart, which was
4 insufficient for meaningful outside review.

5
6 9. The absence of complete records substantially impaired our ability to obtain independent
7 medical review and prevented outside facilities from evaluating whether they could accept Ailin.

8 **TRANSFER EFFORTS**

9
10 10. Since Ailin's hospitalization, my husband and I have contacted numerous hospitals and long-
11 term care facilities throughout California and the United States seeking transfer or evaluation.

12 11. Many facilities informed us they required physician-to-physician discussions before
13 determining whether transfer could occur.

14
15 12. We repeatedly asked CHOC physicians to contact those facilities. We were often informed
16 that CHOC would not initiate discussions unless a specific receiving physician was identified.

17 13. Several receiving facilities informed us they could not identify a specific physician in advance
18 because whichever physician was available would participate when CHOC called. This prevented
19 meaningful progress toward transfer.

20
21 14. HealthBridge is one example. We fully disclosed Ailin's condition, including CHOC's
22 determination following two brain-death examinations, ventilator dependence, blood-pressure
23 support, and the absence of tracheostomy or PEG placement. HealthBridge advised us it was
24 willing to evaluate a transfer and requested physician-to-physician communication.

25 15. After CHOC's physician spoke with HealthBridge, we were informed HealthBridge would not
26 accept the transfer. We were not included in that conversation and do not know what information
27 was provided or why the decision changed.

1 16. We continue making daily efforts to locate any facility willing to evaluate or accept Ailin.

2
3 **RELIGIOUS BELIEFS**

4 17. Our family are practicing Muslims. Our sincerely held religious beliefs require us to exhaust
5 all reasonable medical review and transfer opportunities before life-sustaining treatment is
6 withdrawn and to permit family prayer and presence.

7
8 **MEDICAL DIRECTIVE**

9
10 18. We prepared a Medical Directive (**Attached as Exhibit "A"**) requesting that CHOC begin
11 planning for medically feasible discharge home if appropriate, including evaluation for
12 tracheostomy and PEG placement if medically appropriate, coordination with insurance, home
13 nursing, equipment, transportation, caregiver training, and related services. This request was
14 intended to ensure all medically appropriate options were explored.

15 **REQUEST FOR RELIEF**

16
17 19. We are not asking the Court to practice medicine or substitute its judgment for treating
18 physicians. We respectfully request only a brief preservation of the status quo while complete
19 records are produced, physician-to-physician transfer discussions occur, outside facilities
20 complete their evaluations, and the Court receives competent evidence before any irreversible
21 action occurs.

22 20. If support is withdrawn before these opportunities are exhausted, the harm to our daughter and
23 family will be permanent and irreparable.

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

26 Executed on July 1, 2026, at Irvine, California.

27 

28 Aigerim Bimoldina

1 **SUPPLEMENTAL DECLARATION OF MARAT GABDULLIN**

2 I, Marat Gabdullin, declare:

- 3 1) I am the biological father of Ailin Marat Gabdullina.
- 4 2) Ailin is 23 months old and turns two on July 18, 2026.
- 5 **3) CHOC has stated that they intend to discontinue ventilation and medical services to**
6 **our child today at 7-1-26 at 5:00 PM, unless a court Order is submitted prior to that**
7 **time.**
- 8 4) Because Ailin is such a young child, my spouse and I understand that the brains of infants
9 and very young children are still developing. My spouse and I have also been informed
10 that young children may have greater neuroplasticity than adults. While my spouse and I
11 recognize that these considerations do not determine the legal or medical issues before the
12 Court, they are among the reasons we respectfully believe that she deserves additional
13 time before any irreversible action is taken.
- 14 5) On 6-26-2026 my spouse and I submitted a written Medical Directive to the hospital
15 requesting several additional evaluations because we want to be certain that every
16 reasonable opportunity has been considered before any irreversible decision is carried out.
- 17 6) Specifically, my spouse and I requested:
- 18 A cerebral blood flow study to determine whether any cerebral blood flow remains.
- 19 Thyroid testing, including TSH, Free T3, and Free T4. If any clinically significant
- 20 abnormalities are identified, we requested that they be evaluated and treated as medically
- 21 appropriate.
- 22 Continuous EEG monitoring so that every reasonable effort has been made to evaluate her
- 23 neurological condition.
- 24 7) At this time, the hospital has not agreed to perform these requested evaluations and I
25 request the court make an order that Respondent CHOC perform the requested
- 26 evaluations.
- 27 8) My spouse and I understand that the hospital follows established medical protocols and
28 that these additional evaluations may not be part of its standard protocol for determining
 brain death. We respect the medical team's expertise and responsibilities.

- 1 9) However, as Ailin's parents, and in accordance with our sincerely held religious beliefs
2 and long-standing family traditions, we feel a profound moral obligation to be certain that
3 every reasonable opportunity has been provided before accepting an irreversible
4 conclusion. For us, this is not solely a medical issue - it is also a matter of conscience,
5 faith, and parental responsibility.
- 6 10) Our religious beliefs do not permit us to accept the withdrawal of life-sustaining treatment
7 after only three weeks unless we are convinced that every reasonable step has been taken
8 and that sufficient time has been allowed for careful evaluation. We are respectfully
9 asking only for additional time so that we may fulfill our responsibilities as her parents.
- 10 11) My spouse and I are not asking the Court to resolve the underlying medical questions or to
11 substitute its judgment for that of the physicians. Rather, we respectfully ask the Court to
12 preserve the status quo for a limited period of time so that we may continue pursuing
13 reasonable additional evaluations, continue searching for another hospital willing to
14 accept Ailin, and exercise our rights consistent with our sincerely held religious beliefs.
- 15 12) If life support is withdrawn before these opportunities can be pursued, the harm to our
16 family will be permanent and irreversible. By contrast, granting a short period of
17 additional time would preserve these opportunities while the Court considers our request.
- 18 13) My spouse and I also respectfully request sufficient time for our close family members
19 from Kazakhstan, including Ailin's great-grandmother, the elder of our family, to travel to
20 the United States to be with her and say goodbye if that ultimately becomes necessary.
- 21 14) During this additional time, my spouse and I hope to continue searching for another
22 hospital that may be willing to accept Ailin for ongoing care. If such a hospital is found,
23 we respectfully request the opportunity to transfer her.
- 24 15) Ailin is our youngest child. She cannot speak for herself or advocate for her own interests.
25 As her parents, we believe it is our solemn duty to do everything within our power,
26 consistent with our faith and our responsibilities, before any irreversible decision is made.
- 27 16) My spouse and I do not want to spend the rest of our lives wondering whether something
28 more could have been done. We simply seek the peace of mind that every reasonable
opportunity was provided and that we fulfilled our obligations as Ailin's parents.

1 17) Please grant the TRO, additional evaluations and additional time to arrange a transfer to
2 another hospital.

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

5 Executed on July 1, 2026, at Irvine, California.

6
7 

8 Marat Gabdullin
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

AIGERIM BIMOLDINA VS. RADY CHILDREN'S HEALTH ORANGE COUNTY
Orange County Superior Court
Case No.: 30-2026-01580246-CL-MC-CXC

I am employed in the County of Riverside, State of California; I am over the age of
eighteen years and am not a party to this action; my business address is
31165 Temecula Parkway, Ste. 351, Temecula, CA 92592
and my email address is: LAWYERJTH@GMAIL.COM

On the date set forth below, I caused the foregoing document described as:

SUPPLEMENTAL DECLARATION OF MINOR'S PARENTS IN SUPPORT OF EX PARTE
APPLICATION FOR TEMPORARY RESTRAINING ORDER

to be served on the interested parties in this action as follows:

/ X / BY EMAIL and FAX (C.C.P. § 1013(g) and CRC, Rule 2.251): Pursuant to
the Code and the California Rules of Court, the above documents were sent by
electronic mail to the email listed above. A true and correct copy of the transmittal
will be produced if requested by any party or the court.

Thomas Peabody, Esq.
Counsel for CHILDREN'S HOSPITAL OF ORANGE COUNTY
tpeabody@pbllplaw.com

/ / (STATE) I declare under penalty of perjury under the laws of the State of
California that the above is true and correct. (C.C.P. § 2015.5)

Executed on 7-1-2026, at Temecula, CA.

/s/ John Hranek, Esq.

EXHIBIT "A"

Medical Directive

FOR PATIENT CHART

(Note to Staff: At all times this Directive is to be displayed at the front of **Ailin Marat Gabdullina's Medical Chart**.)

June 27, 2026

TO: All Doctors, Nurses, and All Other Individuals and Corporate Entities of Rady Children's Health Orange County (formerly CHOC), 1201 W. La Veta Avenue, Orange, CA 92868, involved in Healthcare of Ailin Marat Gabdullina, D.O.B. July 18, 2024.

I, Marat Gabdullin, father of **Ailin Marat Gabdullina**, and Aigerim Bimoldina, mother of **Ailin Marat Gabdullina**, are deeply grateful for your having **Ailin Marat Gabdullina**, our daughter, as a patient.

We want **Ailin Marat Gabdullina** to live her entire lifespan representing **Ailin Marat Gabdullina's** full, proper potential. We do not want anyone to shorten her life or hasten her death in any manner.

We agree with all tests to safely diagnose any disease that **Ailin Marat Gabdullina** has or might have. We directed, however, that the apnea test not be done. Over our extreme pleading, it was done anyway, more than once. Our right to speak for our child was overridden. We are disappointed beyond our trust and belief.

We request to be fully, explicitly, and promptly informed (in advance as appropriate) about all tests, treatments, conditions, and diagnoses of **Ailin Marat Gabdullina**.

We are extremely disappointed to learn TSH, T3, and T4 have not been done. We request that all 3 tests be done immediately and we are promptly given the results with reference range for all tests. If T3 is low, we ask that it be given immediately, preferably into the blood of **Ailin Marat Gabdullina**; likewise, if T4 is low, we ask that it be given immediately. We ask that T3 and T4 medication be given in dosage and route to treat hypothyroidism. We expect that tests will be repeated and dosage adjusted to correct thyroid function.

We hereby direct that **Ailin Marat Gabdullina** receives all treatments and care, including all needed surgeries, proper nutrition and hydration to protect and preserve **Ailin Marat Gabdullina's** life.

We anticipate that **Ailin Marat Gabdullina** will need continued ventilatory and nutritional support. We request tracheostomy and PEG tube be done now to facilitate transfer to another hospital, continued treatment outside of an ICU in the hospital, or take her home.

Do not take any organ for transplantation or any other purpose.

We hereby always advise that **Ailin Marat Gabdullina** is to be deemed, and consistently treated, as having a FULL CODE STATUS, unless otherwise explicitly directed in writing by both of us.



Marat Gabdullin, father of **Ailin Marat Gabdullina** 06/27/2026
Date



Aigerim Bimoldina, mother of **Ailin Marat Gabdullina** 06/27/2026
Date

WITNESS Date