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EXHIBIT 1

Declaration of Michael Thom

COPY UNOFFICIAL

NO. _____

IN THE ESTATE OF

KANELLOS D. CHARALAMPOUS

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IN PROBATE COURT NO. _____

OF

HARRIS COUNTY, TEXAS

DECLARATION OF MICHAEL THOM

My name is Michael W. Thom. I am over 21 years of age, and my address is 4700 N.W. 23rd, Suite 115, Oklahoma City, Oklahoma 73127. I swear, under penalty of perjury, that the following statements are true and correct.

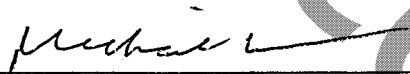
I am an attorney licensed to practice in the State of Oklahoma. I represent Baylor College of Medicine (“BCM”) and Texas Christian University (collectively, the “Charities”) in a proceeding styled No. PB-2024-19, *In the Matter of the Estate of Kanellos D. Charalampous, Deceased*, in the District Court of McClain County, Oklahoma (the “Oklahoma Action”).

In the Oklahoma Action, the Charities have objected to the jurisdiction of the Oklahoma Court for the reason that they believe Dr. Charalampous, the decedent, was a resident of Texas at the time of his death. The Charities have also filed a conditional petition to probate a will dated May 16, 2022 (the “2022 Will”), conditioned that the Oklahoma Court might find it has jurisdiction over the case.

As part of their conditional petition to probate the 2022 Will, I was tasked to locate, secure, and file the original of the 2022 Will. My understanding is that the original will was in the possession of Stephen Mendel, the Texas lawyer who prepared the 2022 Will. Mendel had deposited the original will with the Harris County Clerk in Texas. He met with a representative of BCM at the Harris County Clerk's office and withdrew the original will. A representative of BCM then delivered the original 2022 Will to me, and I filed it with the McClain County Court Clerk. That clerk maintains the original 2022 Will in her possession.

When I filed the original 2022 Will, I requested and obtained a certified copy of the original 2022 Will from the McClain County Court Clerk. Attached to my declaration is the certified copy of the original 2022 Will as maintained by the McClain County Court Clerk. The certified copy is identical to the original 2022 Will as delivered to me by the BCM representative, other than the cover page and the clerk's official stamp on page 10 of 10.

Dated: October 17, 2024.



Michael W. Thom