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5 Attorney for Plaintiff
6 H&H64, Inc.

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10 CENTRAL DISTRICT OF CALIFORNIA
11 U.S. BANKRUPTCY COURT
12 SANTA ANA DIVISION

13 In re

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15 MURAD SHUQOM,

16 Debtor.

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18 H&H64, INC., a Hawaii Corporation,

19 Plaintiff,

20 v.

21
22 MURAD SHUQOM, an Individual; RBS
ROYALTY MOTORSPORTS, INC., a California
23 Corporation; MOTORSPORTS STANDARD,
INC., a California; and DOES 1-100, Inclusive,

24 Defendants.
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Adversary Proceeding Case No. 8:14-ap-
01269

Bankruptcy Case No. 8:14-bk-14461-ES

DECLARATION OF ATTORNEY SETH
DAVIDSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

Date of Hearing: July 9, 2015

Time: 2:00 PM

Courtroom 5

Hon. Erithe Smith

Location: Ronald Reagan Courthouse
411 West Fourth Street
Santa Ana, CA 92701

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Declaration of Seth Davidson

1. My name is Seth Davidson. I am the attorney for H&H64, Inc., the plaintiff in this adversary proceeding, 14-01269. I have personal knowledge of the matters set forth in this declaration. If called upon to testify as to the matters stated herein, I could and would competently testify thereto.
2. This declaration is submitted in support of H&H64, Inc.'s motion for summary judgment.
3. Plaintiff's Requests for Admission of the Genuineness of Documents, Set One, as attached to this motion, are true and correct copies of these documents.
4. Defendant Shuqom's Verified Responses to Plaintiff's Requests for Admission of the Genuineness of Documents, Set One, as attached to this motion, are true and correct copies of these documents. They were served to me by Shuqom's attorneys.
5. Each response of Defendant Shuqom's Amended Responses to Plaintiff's Requests for Admissions, Set One, with Verification as attached to this motion, is a true and correct copy as served on me by Shuqom's attorneys.



Franklin Seth Davidson

Attorney for Plaintiff H&H64, Inc.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Pacific Tower, Suite 500, 21250 Hawthorne Blvd., Torrance, CA 90503

A true and correct copy of the foregoing document entitled (specify): DECLARATION OF SETH DAVIDSON IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; DECLARATION OF HIROMASA HORIKAWA IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) MAY 20, 2015 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Melissa A. Clark, bk_hearings@higbeeassociates.com; mcclark@firstsourcelaw.com
- Matt Higbee, mhigbee@higbeeassociates.com
- Frank Cadigan, frank.cadigan@usdoj.gov
- John Wolfe, john.wolfe@txitrustee.com

Service information continued on

attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on

attached page

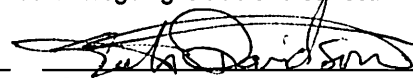
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) FEBRUARY 18, 2015, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on

attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

MAY 20, 2015 FRANKLIN SETH AVIDSON
Date Printed Name


Signature

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