

1 Sanjay Bhandari (SBN 181920)
McNamara Smith LLP
2 655 West Broadway, Suite 1600
San Diego, California 92101
3 Telephone: 619-269-0400
Facsimile: 619-269-0401
4 Email: sbhandari@mcnamarallp.com

5 *Attorneys for Court-appointed Receiver,*

6

7

8

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

I, Thomas W. McNamara, hereby declare as follows:

1. I am the Receiver in this case and I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would competently testify to the facts stated herein.

2. I make this ~~Ex Parte Application Seeking~~ Compliance with Preliminary Injunction and Order to Show Cause as to Why Defendant Brandon Frere Should Not Be Held in Civil Contempt.

3. I have spoken to counsel for both Defendant ~~and Plaintiff~~ and ~~at approximately 11:00 a.m. PT on November 29, 2015~~ by the Court clerk

