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6 Attorneys for Michael G. Kasolas, Trustee

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11
12 In re

13 FOX ORTEGA ENTERPRISES, INC.,
dba PREMIER CRU,

14
15 Debtor.

Case No. 16-40050-WJL

Chapter 7

**DECLARATION OF BRIAN NISHI IN
RESPONSE TO COURT MEMORANDUM
REGARDING ESTATE'S OBLIGATIONS**

16 Date: May 2, 2016

17 Time: 1:00 p.m.

18 Place: Courtroom 220

1300 Clay Street

Oakland, CA

19 Judge: William J. Lafferty, III

20 I, Brian Nishi, declare:

21 1. I am a former employee of Fox Ortega Enterprises, Inc., dba Premier Cru and have
22 been retained to assist the Trustee by preparing reports as requested by the Trustee or his counsel.
23 The following facts are true of my own personal knowledge and if called upon to do so, would and
24 could competently testify thereto, except as to those matters that are alleged upon information and
25 belief and as to those matters, I believe them to be true.

26 2. As previously stated in earlier declarations I am familiar with the Debtor's ordinary
27 business practices and how business records were created and maintained, and know what
28 information was kept electronically, what reports can be generated, and what material information

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CERTIFICATE OF SERVICE

Date: May 2, 2016
Time: 1:00 p.m.
Place: Courtroom 220
1300 Clay Street
Oakland, CA
Judge: The Hon. William J. Lafferty, III

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20 I, Pam Joakimson, declare:

21 I am a citizen of the United States and am employed in the County of Alameda. I am over
22 the age of 18 years and not a party to the within-entitled action. My business address is 1111
23 Broadway, 24th Floor, Oakland, California, 94607-4036.

24 On February 29, 2016, I caused to be served the following document(s):

25 **DECLARATION OF BRIAN NISHI IN RESPONSE TO**
26 **COURT MEMORANDUM REGARDING ESTATE'S OBLIGATIONS**

27 **[X]** by ECF to registered participants:
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 29, 2016, at Oakland, California.

/s/ Pam Joakimson
Pam Joakimson

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