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Temple Beth Sholom of Corona, Inc.
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10 **UNITED STATES BANKRUPTCY COURT**
CENTRAL DISTRICT OF CALIFORNIA
11 **RIVERSIDE DIVISION**

12 In re:

) Chapter 11

) Case No.: 6:11-bk-34883-WJ

14 TEMPLE BETH SHOLOM OF
15 CORONA, INC., California
Non-Profit Corporation,
16
17

) **DECLARATION OF KAREN SPIEGEL IN**
) **SUPPORT OF RESPONSE IN OPPOSITION**
) **TO CARMEL VALLEY PROPERTIES V,**
) **LLC'S, MOTION FOR ORDER TO**
) **TERMINATE THE AUTOMATIC STAY**
) **UNDER 11 U.S.C. §362**

18 Debtor and Debtor in Possession.
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) Continued Hearing:

) Date: December 9, 2011
) Time: 10:00 a.m.
) Place: Courtroom 302
) 3420 Twelfth Street
) Riverside, CA 92501

) **HONORABLE WAYNE E. JOHNSON**
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1 6. Whenever I complete aforesaid statements, I submit those statements in ordinary course
2 to Erik Hassold, Certified Public Accountant, of YOURCORONACPA.COM, for preparation of
3 external financial statements and any other accounting related documents. I also provide Erik Hassold
4 with any additional pertinent information communicated to me by the Board of Directors, officers or
5 agents of the Temple.

6 7. The Temple's Board of Directors has directed me to request Erik Hassold to put together
7 financial statements for 2006 through 2011 and draft financial forecast for 2011 through 2016, based on
8 the financial records accumulated by Erik Hassold from 2006 to present. The Board of Directors further
9 directed me to communicate to Erik Hassold the following facts that should be incorporated in Erik
10 Hassold's analysis of the provided financial data: (1) the executive committee's proposition to ask the
11 congregants for additional \$15,700.00 in contributions over the next 5 years for the building fund and
12 (2) Board of Directors resolution, adapted on or about July 1, 2011, to increase the billing of
13 Membership Pledges/Dues to the congregants for family memberships by 29 % (\$1200 to \$1800 per
14 year) and senior memberships by 64% (\$750 to \$1150) effective January 1, 2012. I provided Erik
15 Hassold with these requests.

16 8. Based on my personal knowledge and my knowledge gathered from the Temple's
17 financial records from the past 17 years, the executive committee's proposition to ask the congregants
18 to raise additional \$15,700.00 for the building fund over the next five years is reasonable. Specifically,
19 in 1994 an effort to progress forward, our congregation had a special pledge to finance two years of
20 Rabbi's salary (\$60,000.00). In 2001, the congregation decided to launch a building campaign to move
21 to a larger facility. It began with a matching contribution program of \$100,000.00. One member made
22 a \$50,000.00 commitment to be paid upon collection of the matching \$50,000.00 from the congregation.
23 The building fund was established in 2004 with the \$100,000.00. After the fund was established, an
24 additional amount of \$12,000.00 was raised by a couple of members to fund the trip and fees to draft
25 the Temple plans by an Architect of Jewish Worship. In 2005 we established a Building Fund Pledge
26 of \$6,000.00 per family/\$3,000 per seniors in addition to the regular contributions with over \$280,000
27 collected over 5 years.

28 9. Base on my personal knowledge and my knowledge gathered form the Temple financial
records, the increase in billing of Membership Pledges/Dues to the congregants for family memberships

1 by 29 % (\$1200 to \$1800 per year) and senior memberships by 64% (\$750 to \$1150) effective January
2 1, 2012 is also reasonable. Over the years I witnessed a numbers of increases in Membership
3 Pledges/Dues, all of which were well supported by the members, with no reduction in the number of
4 members.

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

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8 Dated: November 11, 2011


KAREN SPIEGEL, Declarant

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NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket.

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:
7925 Santa Monica Blvd, Suite 205
West Hollywood, CA 90046

A true and correct copy of the foregoing document described as Declaration of Karen Spiegel in Support of Response in Opposition to Carmel Valley Properties V, LLC's, Motion for Order to Terminate the Automatic Stay Under 11 U.S.C. 362 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 indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 11/10/2011, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Aslan Khodorovsky merritlaw@yahoo.com

Elizabeth A Lossing elizabeth.lossing@usdoj.gov

United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

Dan E Chambers dan.chambers@troutmansanders.com

Meghan C Sherrill meghan.sherrill@troutmansanders.com

Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On 11/11/2011, I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.

US Bankruptcy Court
Honorable Wayne E. Johnson
3420 Twelfth Street, Suite 345
Riverside, CA 92501

Meghan C. Sherrill, Esq.
Troutman Sanders LLP
5 Park Plaza, Suite 1400
Irvine, CA 92614

Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 11/11/2011, I served the following person(s) and/or entity(ies) by personal delivery, 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 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 of America that the foregoing is true and correct.

11/11/2011
Date

Dmitry Merrit
Type Name

Signature 

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.