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15 **UNITED STATES BANKRUPTCY COURT**
 16 **EASTERN DISTRICT OF CALIFORNIA**
 17 **SACRAMENTO DIVISION**

18 In re
 19 CITY OF STOCKTON, CALIFORNIA,
 20 Debtor.

Case No. 2012-32118
 DC No. SEJ-1
 Chapter 9

**REQUEST FOR JUDICIAL NOTICE IN
 SUPPORT OF MOTION FOR ORDER (1)
 CONFIRMING INAPPLICABILITY OF
 AUTOMATIC STAY AND (2) GRANTING
 RELIEF FROM THE AUTOMATIC STAY
 TO THE EXTENT THE AUTOMATIC
 STAY IS APPLICABLE**

Date: July 1, 2014
 Time: 9:30 a.m.
 Place: United States Courthouse
 Dept. C, Courtroom 35
 501 "I" Street
 Sacramento, California 95814

1 Darshan Singh, an individual ("Singh"); Kulwinder Kaur, an individual ("Kaur"); Komal Bros,
2 Inc., a California corporation ("Komal Bros"); and Wilshire Bank fka Wilshire State Bank, a
3 California banking corporation ("Bank"), respectfully request that the Court, pursuant to Federal Rule
4 of Evidence 201 (made applicable by Federal Rule of Bankruptcy Procedure 9017), take judicial
5 notice of the following:

6 1. Complaint in Eminent Domain commencing case number 39-2011-00256897 ("State
7 Court Action") filed by the People of the State of California, acting by and through the Department of
8 Transportation ("Caltrans"), with the California Superior Court for the County of San Joaquin ("State
9 Court") on January 20, 2011, a true and correct copy of which is attached hereto as Exhibit 1.

10 2. Notice of Deposit and Summary of the Basis for the Appraisal filed by Caltrans in the
11 State Court Action on March 21, 2011, a true and correct copy of which is attached hereto as Exhibit
12 2.

13 3. Notice of Motion and Motion for Order of Possession filed by Caltrans in the State
14 Court Action on November 22, 2011, a true and correct copy of which is attached hereto as Exhibit 3.

15 4. Declaration of Alex Menor in Support of Motion for Order for Possession filed by
16 Caltrans in the State Court Action on November 22, 2011, a true and correct copy of which is attached
17 hereto as Exhibit 4.

18 5. Order for Possession entered by the State Court in the State Court Action on January 4,
19 2012, a true and correct copy of which is attached hereto as Exhibit 5.

20 6. Minute Order entered by the State Court in the State Court Action on May 1, 2013, a
21 true and correct copy of which is attached hereto as Exhibit 6.

22 7. Bank's First Amended Answer to Complaint in Eminent Domain; Claims of Interest;
23 and Demand for Compensation filed in the State Court Action on June 26, 2013, a true and correct
24 copy of which is attached hereto as Exhibit 7.

25 8. Plaintiff's Supplement to List of Expert Witnesses and Statements of Valuation Data
26 filed by Caltrans in the State Court Action on May 2, 2014, a true and correct copy of which is
27 attached hereto as Exhibit 8.

28 9. Plaintiff's Supplement to List of Expert Witnesses and Statements of Valuation Data

1 filed by Caltrans in the State Court Action on May 2, 2014, a true and correct copy of which is
2 attached hereto as Exhibit 9.

3 10. List of Expert Witnesses and Statements of Valuation Data filed by the Bank in the
4 State Court Action on March 26, 2014, a true and correct copy of which is attached hereto as Exhibit
5 10.

6 11. List of Expert Witnesses and Statements of Valuation Data filed by Singh, Kaur, and
7 Komal Bros in the State Court Action on March 26, 2014, a true and correct copy of which is attached
8 hereto as Exhibit 11.

9 12. Supplement to List of Expert Witnesses and Statements of Valuation Data filed by
10 Singh, Kaur, and Komal Bros in the State Court Action on April 9, 2014, a true and correct copy of
11 which is attached hereto as Exhibit 12.

12 13. Supplement to List of Expert Witnesses and Statements of Valuation Data filed by
13 Singh, Kaur, and Komal Bros in the State Court Action on or about April 15, 2014, a true and correct
14 copy of which is attached hereto as Exhibit 13.

15 14. Answer of Defendant City of Stockton ("City") to Complaint in Eminent Domain filed
16 in the State Court Action on May 2, 2014, a true and correct copy of which is attached hereto as
17 Exhibit 14.

18 15. Notice of Automatic Stay filed by the City in the State Court Action on May 2, 2014, a
19 true and correct copy of which is attached hereto as Exhibit 15.

20 16. Order entered by the State Court in the State Court Action on May 7, 2014, a true and
21 correct copy of which is attached hereto as Exhibit 16.

22 DATED: June 3, 2014

JENNY & JENNY, LLP

23
24 By: /s/ Scott E. Jenny
25 SCOTT E. JENNY
26 Attorneys for DARSHAN SINGH, KULWINDER
27 KAUR, and KOMAL BROS, INC.
28

1 DATED: June 3, 2014

FRANDZEL ROBINS BLOOM & CSATO, L.C.
THOMAS M. ROBINS III
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CHRISTOPHER D. CROWELL

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By: /s/ Christopher D. Crowell
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