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Electronically FILED by
Superior Court of California,
County of Los Angeles
1/28/2025 3:56 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By D. Jackson Aubry, Deputy Clerk

6 Attorneys for Defendants
HOLDING IP PARKS USA LLC, HOLDING IP PARKS,
7 LLC, KESG HOLDINGS, LLC, KIDS EMPIRE ANAHEIM,
8 LLC, KIDS EMPIRE BAKERSFIELD (CA), LLC, KIDS
EMPIRE COVINA, LLC, KIDS EMPIRE MONROVIA,
9 LLC, KIDS EMPIRE MONTCLAIR, LLC, KIDS EMPIRE
NORTHRIDGE, LLC, KIDS EMPIRE ONTARIO, LLC,
10 KIDS EMPIRE OTAY RANCH (CA), LLC, KIDS EMPIRE
POMONA, LLC, KIDS EMPIRE RIALTO, LLC, KIDS
11 EMPIRE RIVERSIDE, LLC, KIDS EMPIRE SOUTH
12 GATE, LLC, KIDS EMPIRE USA, LLC, KIDS EMPIRE
WOODLAND HILLS, LLC, HAIM ELBAZ

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES

16 YANIRA ROSAS, a minor, by and through her
guardian, DIANA TAPIA, individuals,

17 Plaintiffs,

18 v.

19 KIDS EMPIRE ANAHEIM, LLC, KIDS
20 EMPIRE BAKERSFIELD (CA), LLC, KIDS
EMPIRE COVINA, LLC, KIDS EMPIRE
21 MONROVIA, LLC, KIDS EMPIRE
MONTCLAIR, LLC, KIDS EMPIRE
22 NORTHRIDGE, LLC, KIDS EMPIRE
ONTARIO, LLC, KIDS EMPIRE OTAY
23 RANCH (CA), LLC, KIDS EMPIRE
POMONA, LLC, KIDS EMPIRE RIALTO,
24 LLC, KIDS EMPIRE RIVERSIDE, LLC,
KIDS EMPIRE SOUTH GATE, LLC, KIDS
25 EMPIRE USA, LLC, KIDS EMPIRE
WOODLAND HILLS, LLC, KESG
26 HOLDINGS, LLC, HAIM ELBAZ, an
individual, and DOES 1-10,

27 Defendants.
28

Case No. 21STCV24645

**DECLARATION OF STEVEN A.
GROODE RE POTENTIAL CY PRES –
NEIGHBORHOOD LEGAL SERVICES**

ASSIGNED FOR ALL PURPOSES TO
JUDGE STUART M. RICE

Trial Date: None assigned
Complaint Filed: July 6, 2021

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1. I am a shareholder with the law firm of Littler Mendelson, P.C. (“Littler Mendelson”) and counsel of record for the Kids Empire Defendants and Haim Elbaz (collectively, “Defendants”) in the above-captioned matter. I am licensed to practice law in the State of California and appear in the above-captioned matter. Except as otherwise indicated, I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, I could and would competently testify hereto.

3. Neither I, nor my law firm, sit on any board or govern or are involved in any matter in the affairs or business operations of the Neighborhood Legal Services, nor have any financial, pecuniary, or other interest in Neighborhood Legal Services.

Steve Kosh

4856-4415-7256.1 / 119042-1000

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not
4 a party to the within action; my business address is 130 North Brand Boulevard, Suite 410, Glendale,
5 California 91203.

6 On January 28, 2025, I served the foregoing document described as:

7 **DECLARATION OF STEVEN A. GROODE RE POTENTIAL CY PRES –**
8 **NEIGHBORHOOD LEGAL SERVICES**


9 on the interested parties set out as follows, by the method indicated below:

10 Steven Groode, Esq. (sgroode@littler.com)
11 Jacob Lahana, Esq. (jlahana@littler.com)
12 2049 Century Park East, Fifth Floor
13 Los Angeles, CA 90067
14 Phone: (310) 553-0308

15 **XXX** **(BY ELECTRONIC SERVICE)** Based on a court order or an agreement of the parties
16 to accept electronic service, I caused the documents to be sent to the persons at the
17 electronic service addresses listed above via third-party cloud service
18 **CASEANYWHERE.**

19 **XXX** **(STATE)** I declare under penalty of perjury under the laws of the State of California that the
20 above is true and correct.

21 Executed on January 28, 2025, at Glendale, California.

22 
23 Geri Johnston