

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LANE

In re Judicial Dissolution of,
Zadeh Kicks LLC dba Zadeh Kicks
the Petitioner.

Case No. 22CV16510

DECLARATION OF DAVID P.
STAPLETON IN SUPPORT OF
RECEIVER'S MOTION TO EXTEND
AUTOMATIC STAY

I, David P. Stapleton, declare and state:

1. I am the court-appointed receiver in this case. I make this declaration in support of Receiver's Motion to Extend Automatic Stay. I have personal knowledge of the facts stated in my declaration, and I am competent to testify regarding them.

2. On May 20, 2022, this Court entered an order appointing me as the receiver for Zadeh Kicks LLC dba Zadeh Kick ("**Petitioner**").

3. At the time this Court entered an Order appointing the Receiver and shortly thereafter, there were two judgments entered against Zadeh Kicks in Utah.¹ The automatic stay resulted in the dismissal of Zadeh Kicks from that litigation.

4. I have taken control of and worked diligently to develop a plan to liquidate Zadeh Kicks' assets for maximum value then equitably distribute the proceeds to Zadeh Kicks' creditors.

5. Contemporaneous with this Motion to Extend Automatic Stay, I am filing a motion seeking approval of my proposed liquidation plan. The orderly sale or transfer of those assets is

¹ See *Nextwave Funding v. Zadeh Kicks LLC, et al.*, No. 220903272 in Third District Court for the State of Utah, Salt Lake County; *Nextwave Funding v. Zadeh Kicks LLC, et al.*, No. 220903272 in Third District Court for the State of Utah, Salt Lake County.

1 necessary to raise funds to pay creditors and other parties in interest. If there are ultimately disputed
2 claims in this proceeding, it will also be more cost-effective and efficient for this Court to resolve
3 those claims instead of devoting time and incurring legal fees litigating claims in multiple courts.

4 6. Absent the extension of the stay, the benefits of maximizing value and managing
5 competing claims could be lost, to the detriment of all creditors and parties in interest. For instance,
6 creditors could engage in a race to the courthouse, Nextwave Funding would revive its judgment
7 against Zadeh Kicks in Utah, and American Express may seek to add Zadeh Kicks to its pending
8 lawsuit against the company's former owner.²

9 7. Based on my business judgment, it is in the best interests of Zadeh Kicks' creditors
10 and the other interested parties, if this Court extends the stay for the duration of the receivership
11 so that I can focus on maximizing the creditors' recovery and ensuring a fair distribution of the
12 assets instead of spending time and the Receivership's assets defending against piecemeal
13 litigation.

14 8. I am confident that the more cost-effective, efficient and fair approach is for
15 creditor claims to be resolved before this Court, in this proceeding, after such time as the assets
16 can be sold or transferred and the claims can be paid in the priority required by the Oregon
17 receivership code.

18 **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE**
19 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE**
20 **FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.**

21 DATED this 3rd day of November, 2022.

22
23 

24 David P. Stapleton

25
26 ² *American Express National Bank v. Malekzadeh, et al.*, No. 6:22-cv-01070-AA in the United States District Court for the District of Oregon, Eugene Division

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF DAVID P. STAPLETON IN SUPPORT OF MOTION TO EXTEND AUTOMATIC STAY on the parties listed below by the method(s) indicated and on the attached Special Notice List via email on the date set forth below:

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DATED this 4th day of November, 2022.

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