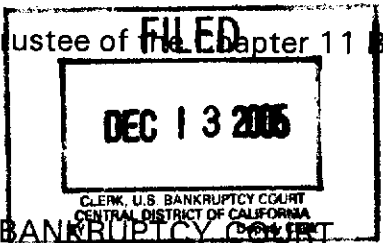


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2 RONALD P. SLATES, A PROFESSIONAL CORPORATION
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ORIGINAL

5 Attorneys for Plaintiff R. Todd Neilson, Trustee of the Chapter 11 Bankruptcy Estate of
6 Reed E. Slatkin



8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA NORTHERN DIVISION

11 In re) CASE NO. ND01-11549-RR
12 REED E. SLATKIN and Substantively) Chapter 11
Consolidated Affiliates TOPSIGHT)
13 OREGON, INC. and REED SLATKIN) Adv. No.: AD02-01225-RR
INVESTMENT CLUB, L.P.,)
14 Reorganized Debtors.)
15)
16 R. TODD NEILSON, Trustee of the Chapter)
11 Bankruptcy Estate of Reed E. Slatkin,)
17 Plaintiff,)
18 vs.)
19)
20 ARLO GORDIN, an individual, and DOES 1-)
30, Inclusive,)
21 Defendants.)

DECLARATION OF JOHNNY KIM, ESQ. IN SUPPORT OF APPLICATION AND ORDER FOR APPEARANCE AND EXAMINATION OF THIRD PERSON, CLAIRE LOEWING AS PERSON MOST KNOWLEDGEABLE OF UNIVERSAL CITY HEALTH MANAGEMENT GROUP, INC. PURSUANT TO C.C.P. SEC. 708.120 AND 708.130
DATE: January 4, 2006
TIME: 10:00 A.M.
PLACE: 1415 State St. Room 201 Santa Barbara, CA 93101-2511

23 I, JOHNNY KIM, do hereby declare and state as follows:
24
25 1. I am an attorney at law duly licensed to practice law before all of the
26 Courts of the State of California, as well as the United States District Court for the
27 Central District of California, and am an associate attorney employed by RONALD P.
28 SLATES, A PROFESSIONAL CORPORATION (the "Firm") specially appointed attorneys

1 for Plaintiff R. Todd Neilson, Chapter 11 Trustee of the Bankruptcy Estate of Reed E.
2 Slatkin ("Judgment Creditor")

3 2. I am making this Declaration in support of Judgment Creditor's Application
4 and Order for Appearance and Examination of Third Person, **CLAIRE LOEWING**
5 ("LOEWING").

6 3. In or about early December, 2005, Judgment Creditor caused the Firm to
7 file and serve an Application and Order for Appearance and Examination ("ORAP") upon
8 a Dr. Michael Pangelinan. Dr. Pangelinan is a Doctor of Chiropractic who is employed
9 by the Gordin Center, University City Medical Group, Inc. ("UCMG"), which medical
10 center features the name of Judgment Debtor in this matter, namely ARLO GORDIN
11 ("Judgment Debtor"), and headlines Judgment Debtor as the marquee chiropractic
12 doctor.

13 4. After serving Dr. Pangelinan with the aforementioned ORAP, on or about
14 December 8, 2005, your declarant engaged in a telephonic conference with Edward
15 Stark, Esq., attorney for Dr. Pangelinan.

16 5. During this telephonic conversation with Mr. Stark, your declarant learned
17 the following:

- 18 a. Judgment Debtor and the person to be examined, Loehwing, are the only
19 two signatories to the bank accounts of UCMG;
- 20 b. Loehwing has been the bookkeeper and the "right-hand" person of
21 Judgment Debtor from since at least 1994 through the present;
- 22 c. Whenever any income is generated and received by UCMG, it is taken from
23 the bank accounts of UCMG, by either Judgment Debtor or Loehwing, and
24 transferred to a corporation by the name of UNIVERSITY HEALTH
25 MANAGEMENT, INC., to which Judgment Debtor is the C.E.O. and only
26 owner; and
- 27 d. During the past year, Judgment Debtor and Loehwing on behalf of
28 Judgment Debtor, has withdrawn close to \$1,000,000.00 from the bank

1 accounts of UCMG and continue to withdraw monies from said accounts.

2 6. During said telephonic conference with Mr. Stark, your declarant further
3 learned that:

4 a. The person to be examined, LOEHWING, just recently formed a closely
5 held corporation by the name of UNIVERSAL CITY HEALTH MANAGE-
6 MENT GROUP, INC. ("UCHMG");

7 b. LOEHWING is the principal or owner of UCHMG;

8 c. In or about September or November, 2005, the doctors who work at
9 UCMG received a letter from an attorney representing UCHMG and
10 LOEHWING stating that UCHMG/LOEHWING just recently purchased all of
11 the hard assets used at UCMG (e.g. trade fixtures, medicine, office
12 equipment, etc.) from Judgment Debtor and that UCHMG/LOEHWING was
13 inquiring as to whether the doctors who worked at UCMG would be
14 interested in purchasing said assets from UCHMG/LOEHWING.

15 7. Based on the foregoing, your declarant respectfully submits that it is
16 reasonable to infer that there are or were monetary transfers between JUDGMENT
17 DEBTOR and UCHMG that will lead to the discovery of (admissible) evidence to recover
18 the assets of the Judgment Debtor.

19 8. Based on the foregoing, your declarant is further informed and believes
20 and based on such information and belief alleges that the party to be examined,
21 LOEHWING, as the principal owner and person most knowledgeable of UCHMG, has
22 control and custody of assets which belong to the Judgment Debtor, including but not
23 limited to monies owed to Judgment Debtor for the purchase by LOEHWING/UCHMG
24 of the assets used by UCMG, and/or may provide information regarding monies paid to
25 or currently owed to Judgment Debtor, and/or the location of items belonging to the
26 Judgment Debtor, and not currently in the direct care, custody, control or possession
27 of the Judgment Debtor himself.

28 9. In addition, your declarant is informed and believes and based upon such

1 information and belief alleges that Judgment Debtor has left the country in an attempt
2 to prevent Judgment Creditor from enforcing the judgment issued in favor of Judgment
3 Creditor and against Judgment Debtor, in the above-entitled matter.

4 10. Your declarant is therefore informed and believes and based upon such
5 information and belief alleges that UCHMG, as a corporation which just purchased
6 property from Judgment Debtor, could have documents e.g. documents which pertain
7 to the transfer of funds for said purchase or correspondence between Judgment Debtor
8 and UCHMG regarding said purchase, which could provide information as to the current
9 location and whereabouts of Judgment Debtor or information which could lead to the
10 current location and whereabouts of Judgment Debtor.

11 I have personal knowledge of the facts set forth above and if called upon as a
12 witness I could and would competently testify thereto.

13 I declare under penalty of perjury under the laws of the State of California that
14 my Declaration as set forth above is true and correct and that this Declaration was
15 executed at Los Angeles, California on December 12, 2005.

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19 JOHNNY KIM
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