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14 JANICE M. McCLANAHAN

15 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF LOS ANGELES

17 JANICE M. McCLANAHAN,

18 Plaintiff,

19 vs.

20 HAROLD MANSDORF, individually and as
21 Trustee of the Mansdorf Family Revocable
22 Trust also known as the Mansdorf Family
23 Trust; MILDRED MANSDORF, NORMAN
24 MANSDORF and DOES 1 to 50 inclusive,
25 Defendants.

Case No.: BC 363659

Department 51

26 DECLARATION OF
27 TIMOTHY B. SOTTILE IN SUPPORT OF
28 DEFAULT JUDGMENT BY COURT

I, Timothy B. Sottile, declare as follows:

1. I am an attorney at law authorized to practice before this Court and the attorney of record for JANICE McCLANAHAN in this action. I have personal knowledge of the facts set forth herein and if called as a witness, could and would competently testify to the facts stated herein.

2. A brief summary of the case identifying the parties and the nature of the plaintiff's claim is filed concurrently herewith under separate cover.

3. Attached as Exhibit "A" is a true and correct copy of the proof of service by publication of the plaintiff's Statement of Damages in the above referenced case, which identified the

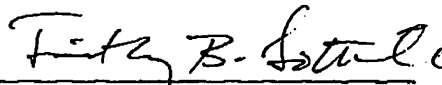
1 damages suffered by the plaintiff herein as \$1,000,000.00 in special economic damages;
2 \$1,000,000.00 in general damages and \$10,000,000.00 in punitive damages.

3 4. Defendants' defaults were entered on October 2, 2007.

4 5. A true and correct copy of Janice M. McClanahan's Declaration in Support of the
5 Default Judgment is attached hereto as Exhibit "B".
6

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct.

9 Executed this 1st day of November, 2007, at Woodland Hills, California.

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12 Timothy B. Sottile
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DECLARATION OF PUBLICATION

ORIGINAL FILED

AUG 29 2007

LOS ANGELES
SUPERIOR COURT

COPY

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

TIMOTHY B SOTTILE ESQ
SBN127026
TIMOTHY B SOTTILE APLC
21800 OXNARD ST
STE 750
WOODLAND HILLS CA 91367

STATEMENT OF DAMAGES
McCLANAHAN v. MANSDORF
BC363659

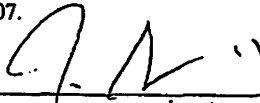
Case No. BC363659
STATEMENT OF DAMAGES
(Personal Injury or Wrongful Death)
Superior Court of California, County
of Los Angeles, 111 N. Hill Street, Los
Angeles, CA 90012, Central District
Plaintiff: JANICE M. McCLANAHAN
Defendant: HAROLD MANSDORF,

ET AL
To: HAROLD MANSDORF and
MILDRED MANSDORF
Plaintiff JANICE M. McCLANAHAN
seeks damages in the above-entitled
action, as follows:
1. General damages
a. Pain, suffering, and inconvenience \$500,000
b. Emotional distress \$500,000
2. Special damages
i. Other (specify) value of property
taken \$1,000,000
3. Punitive damages: Plaintiff
reserves the right to seek punitive dam-
ages in the amount of (specify) when
pursuing a judgment in the suit filed
against you. \$10,000,000.00
Date: June 6, 2007
TIMOTHY B. SOTTILE, SBN 127026
Attorney for Plaintiff
CN780925 McCLANAHAN Aug
8,13,20,27, 2007

The undersigned says:

I am over the age of 18 years and a citizen of the United States. I am not a party to and have no interest in this matter. I am a principal clerk of the METROPOLITAN NEWS-ENTERPRISE, a newspaper of general circulation in the City of Los Angeles, the Judicial District of Los Angeles, the County of Los Angeles, and the State of California, as adjudicated in Los Angeles Superior Court Case No. 601165. The notice, a printed copy of which appears hereon, was published on the following date(s): Aug 6,13,20,27, 2007

I declare under penalty of perjury that the foregoing is true and correct. Executed at Los Angeles, California on 08/27/07.


signature

Metropolitan News-Enterprise
P.O. Box 60859
Los Angeles, Ca 90060

Phone: (213) 346-0033
Fax: (213) 687-3886

Cust. Num.: 014950 Control Num.: 780925
Cust. Ref. Num.: McCLANAHAN

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DECLARATION OF JANICE M. McCLANAHAN

I, Janice M. McClanahan, declare as follows:

1. I have personal knowledge of the facts contained herein, except where stated on information and belief, and if called upon as a witness, would and could competently testify to the facts as stated herein.

2. I am the plaintiff in the lawsuit entitled Janice M. McClanahan v. Harold Mansdorf, et al, Los Angeles Superior Court Case No. BC 363659.

3. Lee Mansdorf and I had a longstanding intimate romantic relationship of more than twenty years' duration which continued until Lee Mansdorf's death on June 27, 2003.

4. During our relationship, I was repeatedly told by Lee Mansdorf that I would be taken care of upon his death and he reiterated this promise to me the day before he died.

5. As a result of my longstanding and close, personal, romantic relationship with Lee Mansdorf, I knew of his brother, Harold Mansdorf, for over twenty years prior to Lee Mansdorf's death and placed a great deal of trust in him. I understood that Lee and Harold were very close and that after Lee's death Harold was the Trustee of the Mansdorf Family Trust. Based on my having known of Harold for such a long time, and my knowing of the trust that Lee Mansdorf had placed in Harold, I expected that Harold Mansdorf would be honorable and truthful to me, as had his brother Lee, over the many years we were involved with each other.

6. Approximately five months after Lee Mansdorf's death, while I was still grieving his loss, Harold Mansdorf telephoned me and explained that a deed on a worthless piece of property which had been controlled by Lee Mansdorf listed me as a part owner of the property and that he needed me to sign a quit claim deed to him as the Trustee of the Mansdorf Family Trust, because he was in the process of wrapping up Lee's affairs at year-end, 2003 and that the negligible amount received from the sale of this small piece of vacant land would be used to pay taxes owed by Lee Mansdorf's estate. Trusting Harold Mansdorf and relying on his representation with respect to the property, I signed the quit deed to the property for no payment, attached as Exhibit "A" to the Complaint in this case on December 19, 2003. A true copy is also attached hereto and incorporated herewith as Exhibit "A". I was never paid anything whatsoever for the property. Thereafter, I spoke with Harold Mansdorf many

1 times and was told that Lee Mansdorf had not left a will and that although he had looked, he had not
2 turned up anything in Lee's house, which they shared, concerning me.

3 7. On or about March 1, 2006, I was asked by a long time business associate of Lee Mansdorf,
4 Richard Percell, how I was doing financially after Lee Mansdorf's death. I explained to Mr. Percell
5 that to my knowledge and despite Lee's assurances to me that I would be provided for financially upon
6 his death, Lee Mansdorf had not left me any money or assets, other than a small, worthless piece of
7 vacant land that had been in my name and that I had deeded, in December 2003, to his brother Harold
8 Mansdorf as Trustee of the Mansdorf Family Trust for no payment at his request, to clear up a tax issue
9 concerning Lee Mansdorf's estate at year end, 2003.

10 8. Mr. Percell expressed great shock and disappointment at this news and explained to me that the
11 property I had deeded to Harold Mansdorf in December 2003 was a valuable piece of land that was part
12 of a large land development project that he had been working on for many years with Lee Mansdorf.
13 He expressed further shock because he told me that he had been told by Harold Mansdorf, when he was
14 called to testify during the preceding year in a case brought against the Mansdorf Family Trust by Lee
15 Mansdorf's ex-wife, that Lee Mansdorf had left me \$500,000.00 and additional funds sufficient to buy
16 a new car, in his will.

17 9. After March 2006, I learned that contrary to the false representations that Harold Mansdorf
18 made to me in December 2003, the supposedly valueless piece of property I was requested to quit claim
19 to Harold Mansdorf on December 19, 2003, had in fact been sold by the Mansdorf Family Trust for
20 \$600,000.00 on December 5, 2003, which sale was recorded on December 31, 2003.

21 10. Harold Mansdorf's fraudulent inducement of me to quit claim this property in breach of the trust
22 I had reposed in him and during the time I was still grieving the loss of his brother, Lee Mansdorf, my
23 longtime romantic companion, has caused me substantial financial damage and emotional distress.

24 I declare under penalty of perjury under the law of the State of California, that the foregoing is
25 true and correct.

26 Executed this 23 day of July, 2007 at Las Vegas, Nevada.

27 
28 JANICE M. McCLANAHAN

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DECLARATION OF JANICE M. McCLANAHAN

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RECORDING REQUESTED BY Lawyers Title Company WHEN RECORDED MAIL THIS DOCUMENT
AND TAX STATEMENTS TO: Harry Mansdorf 811 North Alta Drive Beverly Hills, CA 90210

APN: 2562-006-009 Escrow No: 02001297-200-MM1 Title No: 2001297-70

Space above this line for
Recorder's use

GRANT DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S)

DOCUMENTARY TRANSFER TAX IS \$NONE - CORRECTION DEED, CITY TAX 0.00
computed on full value of property conveyed,, AND

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

JANICE McCLANAHAN, an unmarried woman

hereby GRANT(S) to

HARRY MANSDORF, TRUSTEE OF THE LEE MANSDORF FAMILY REVOCABLE TRUST
DATED JULY 13, 2001

the following described real property in the City of Los Angeles, County of Los Angeles, State
of California:

See Exhibit A attached hereto and made a part hereof.

Commonly known as: Vacant Land, Los Angeles, CA

Dated: December 19, 2003

	
Janice McClanahan	

STATE OF CALIFORNIA COUNTY OF } SS: On, before me, Notary Public, personally appeared,
personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose
name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed
the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the
instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the
instrument. WITNESS my hand and official seal. Signature: FOR NOTARY SEAL OR STAMP
MAIL TAX STATEMENTS AS DIRECTED ABOVE

ZABA -

811 Alta Dr.

4/11/04

EXHIBIT "A"

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I certify that the foregoing is true, correct and complete to the best of my knowledge and belief.

Signed _____ Dated _____
NEW OWNER/CORPORATE OFFICER

Please Print Name of New Owner/Corporate Officer _____

Phone Number where you are available from 8:00 a.m. - 5:00 p.m. _____

(NOTE: The Assessor may contact you for further information)

If a document evidencing a change of ownership is presented to the recorder for recordation without the concurrent filing of a preliminary change of ownership report, the recorder may charge an additional recording fee of twenty dollars (\$20).

Exhibit A

All that certain real property situated in the County of Los Angeles, State of California, described as follows:

Parcel 1:

That portion of the northeast one-quarter of fractional section 25, township 2 north, range 14 west, in V. Beaudry's Mountains, in the city of Los Angeles, state of California as per map recorded in book 36 pages 67 to 71 inclusive of miscellaneous records, in the office of the county recorder of said county, described as follows:

Beginning at a point in the northerly line of a strip of land 84.00 feet wide, described in the deed to the city of Los Angeles, recorded on February 6, 1958 as instrument no. 28, described in parcel 47837-1, amended in the final decree of condemnation entered in superior court of Los Angeles county, case no. NC C 87878, a certified copy of which was recorded on May 3, 1976 as instrument no. 2743, of official records, in the office of the county recorder; thence north 15° 59' 50" west 115.76 feet; thence north 24° 11' 56" east, 270.80 feet; thence north 84° 48' 20" east, 243.10 feet; thence north 79° 58' 52" east, 762.91 feet to the east line of said Section 25; thence along said east line south 0° 32' 22" east, 196.06 feet to the northerly line of said strip of land 84.00 feet wide; thence along said last mentioned northerly line, south 73° 33' 39" west, 1,120.00 feet to the point of beginning.

Except therefrom, that portion lying southerly of the northerly line of La Tuna Canyon road, 60.00 feet wide as shown on county surveyor's map no. B-725, on file in the office of the county engineer of said county.

Also except therefrom that portion of said land included within the land as described in parcel 47837-1 (amended) in the final decree of condemnation entered in the Los Angeles county superior court, case no. NC C 87878, a certified copy of which was recorded May 3, 1976 as instrument no. 2743, in book 47065 page 531, official records of said county.

Parcel 2:

The south half of the northwest quarter of the northwest quarter of Section 30, Township 2 North, Range 13 West, in the City of Los Angeles, County of Los Angeles, State of California, as shown on County Surveyor's Map B-725 on file in the office of the County Engineer of said county.

Except that portion of said land conveyed to the City of Los Angeles, by Deed recorded

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December 20, 1960 as Instrument No. 1385, in Book D1069 Page 778, Official Records.

Also except the northeast one-fourth of the southeast one-fourth of the northwest one-fourth of the northwest one-fourth of said section.

Also except therefrom, that portion of said land lying southerly of the northerly line of La Tuna Canyon Road, as shown on County Surveyor's Map B-259, Sheet 2, on file in the office of the County Engineer of said county.

Also except therefrom that portion of said land included within the lines of that certain strip of land, 84.00 feet wide, described in the Deed to the City of Los Angeles, recorded on February 6, 1958 as Instrument No. 3279, in Book D5 Page 675, Official Records of said county.

Also except therefrom, that portion of said land included within the land as described in Parcel 47837-1 (amended) in the Final Decree of Condemnation entered in the Los Angeles County Superior Court, Case No. C87878, a certified copy of which was recorded May 3, 1976 as Instrument No. 2743, in Book D7065 Page 531, Official Records of said county.

Parcel 3:

The south half of the northeast quarter of the northwest quarter of Section 30, Township 2 North, Range 13 West, in the City of Los Angeles, County of Los Angeles, State of California, as shown on county Surveyor's Map B-725 on file on the office of the County Engineer of said county.

Except therefrom, that portion of said land lying southerly of the northerly line of La Tuna Canyon Road, as shown on County Surveyor's Map No. B-259, Sheet 2, on file in the office of the County Engineer of said county.

Also except therefrom that portion of said land included within the lines of that certain strip of land 84.00 feet wide, described in the Deed to the City of Los Angeles, recorded on February 6, 1958 as Instrument No. 3279, in Book D5 Page 675, Official Records of said county.

Also except therefrom, that portion of said land included within the land as described in Parcels 47837-1 (amended), 47837-1, 49264 and 56121, in the Final Decree of Condemnation, entered in the Los Angeles County Superior Court Case No. NC C87878, a certified copy of which was recorded May 3, 1976 as Instrument No. 2743, in Book D7065 Page 531, Official Records of said county.

Parcel 4:

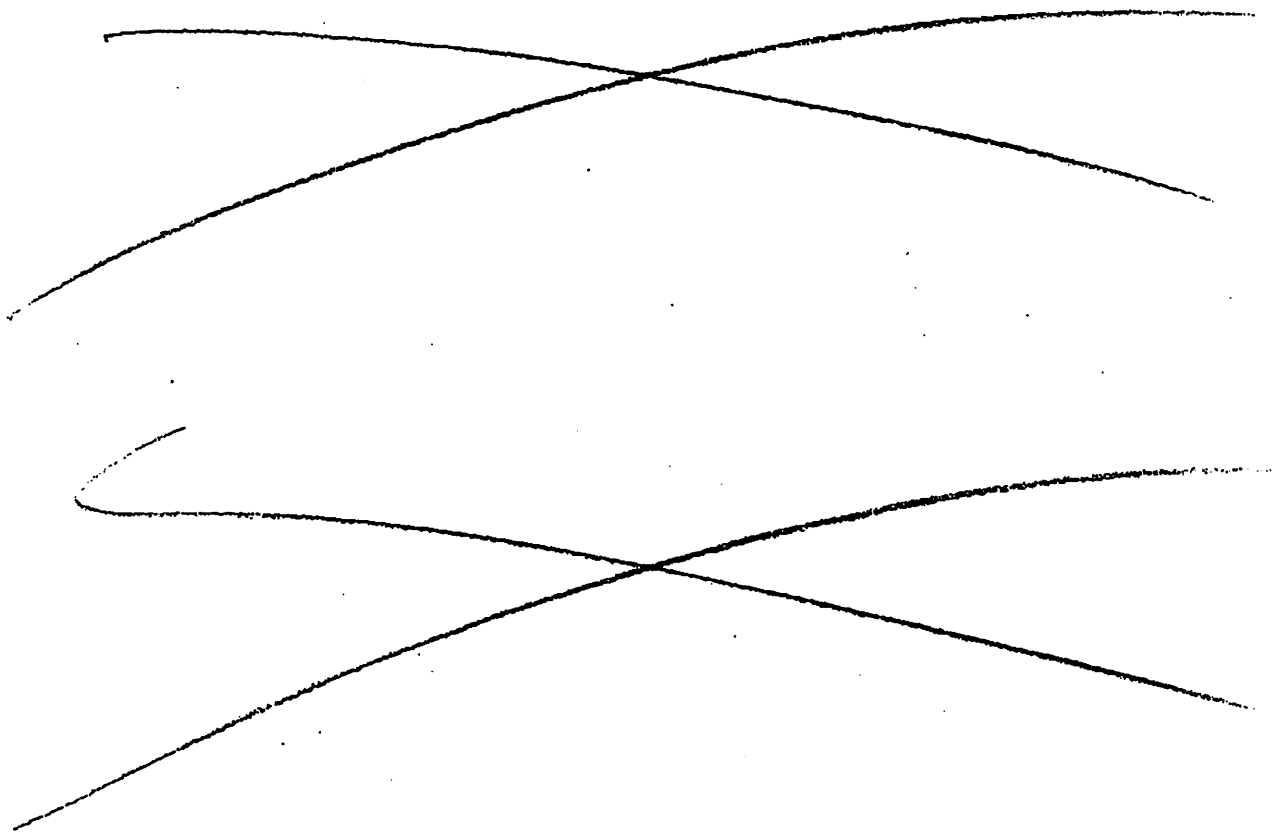
That portion of the northeast quarter of the southeast quarter of the northwest quarter of the northwest quarter of Section 30, Township 2 North, Range 13 West, in V. Beaudry's Mountains, as per Map recorded in Book 36 Pages 67 to 71 inclusive of Miscellaneous Record Maps, in the office of the County Recorder of said County, described in Deed (State Parcel 47840) recorded January 27, 1970 in Book D4616 Page 861 of Official Records in said office, described as follows:

Beginning at the intersection of the westerly line of the land described in said Deed with the general northerly line of the land described in the Deed recorded December 20, 1960 as Instrument No. 1385 in Book D1069 Page 778 of said Official Records, thence along said westerly line, north 00° 32' 22" west, 144.55 feet; thence south 82° 59' 47" east 69.82 feet; thence south 83° 09' 40" east, 261.96 feet to the easterly line of said first described land; thence along said easterly line, south 00° 32' 22" east, 174.88 feet to said general northerly

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line; thence westerly along said general northerly line to the point of beginning.



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(individual)

STATE OF NEVADA
COUNTY OF Clark } ss.

On 12-22-03 before me, the undersigned, a Notary Public in and for said
State, personally appeared

Janice McClanahan

personally known (or proved) to me

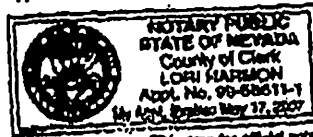
to be the person whose name subscribed
to the above instrument who acknowledged that Janice McClanahan
executed the same.

WITNESS my hand and official seal.

Signature Laci Harman

Laci Harman
Name (Typed or Printed)

FORM 602



(This area for official notarial seal)

12/22/03

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