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6 Attorneys for Defendants  
San Diego United Holdings Group, LLC, Ninus Malan  
7 And Balboa Ave Cooperative

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**09/06/2017** at 02:58:00 PM  
Clerk of the Superior Court  
By Mary E. Bane, Deputy Clerk

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SAN DIEGO- CENTRAL DIVISION**

11  
12 MONTGOMERY FIELD BUSINESS  
CONDOMINIUMS ASSOCIATION, a  
13 California Nonprofit Mutual Benefit  
Corporation,

14 Plaintiff,

15 vs.

16 BALBOA AVE COOPERATIVE, a  
California corporation; SAN DIEGO  
17 UNITED HOLDINGS GROUPS, LLC, a  
California limited liability company;  
18 NINUS MALAN, an individual; RAZUKI  
INVESTMENTS, LLC, a California  
19 limited liability company; SALAM  
RAZUKI, an individual; and DOES 1  
20 through 25, inclusive;

21 Defendants.  
22

**CASE NO. 37-2017-00019384-CU-CO-CTL**

Assigned to Judge: Honorable Ronald L. Styn

**DECLARATION OF SALAM RAZUKI IN  
SUPPORT OF DEFENDANTS BALBOA  
AVE COOPERATIVE, SAN DIEGO  
UNITED HOLDINGS GROUP, LLC, AND  
NINUS MALAN'S OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

[IMAGED FILE]

**DATE:** September 8, 2017

**TIME:** 11:00 a.m.

**DEPT:** C-62

23 I, Salam Razuki, declare:

24 1. I am over the age of 18 and am a party to this action. I have personal knowledge  
25 of the facts stated in this declaration. If called as a witness, I would testify competently thereto. I  
26 provide this supplemental declaration in support of defendants San Diego United Holdings  
27 Group, LLC, Balboa Ave Cooperative, and Ninus Malan's opposition to plaintiff Montgomery  
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1 Field Business Condominiums Association's ("Association" or "Plaintiff") request for preliminary  
2 injunction ("Plaintiff's Motion").

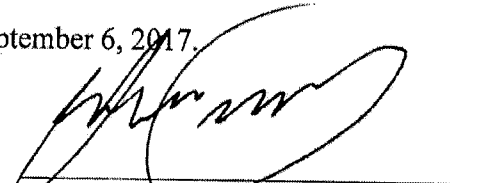
3 2. I am the former owner of 8863 Balboa Ave Unit E, San Diego CA 92123 and  
4 because of my ownership, a former member of the Montgomery Field Business Condominiums  
5 Association (the "Association").

6 3. In 2016, I met with Peter Michelet and he told me that he was the Association  
7 Secretary and had been since 2010. He also stated that the only other board members were Daniel  
8 Burakowski and Glenn Strand. He said that no one else wanted to be on the board because Mr.  
9 Burakowski operated everything by himself. When I inquired about Ed Quinn's role with the  
10 Association, he said Mr. Quinn was only an owner and the reason why he was always present at  
11 meetings was because they were often held at his office because it was the nicest.

12 4. In early 2017, I met with Ed Quinn in his office and he told me that he had never  
13 been the Association's Secretary or an officer; and that there was never anything in writing  
14 indicating that he was the Secretary or an officer of the Association. He indicated that his office  
15 was used for Association meetings.

16 5. I showed Mr. Quinn the 2015 Amendment to the Association's CC&Rs that  
17 contained his signature and he stated that it was his signature, but he did not know why Mr.  
18 Burakowski asked him to sign it. He said he was bothered by the fact that Mr. Burakowski had  
19 him sign it when he was never on the Board of Directors or the Association's Secretary.

20 I declare under penalty of perjury under California state law that the foregoing is true and  
21 correct. Executed in San Diego, California, on September 6, 2017.

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24   
Salam Razuki

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