

In the
Court of Appeal
of the
State of California
FOURTH APPELLATE DISTRICT
DIVISION ONE

D075028

SALAM RAZUKI,
Plaintiff-Respondent,

v.

NINUS MALAN, SAN DIEGO UNITED HOLDINGS GROUP, LLC,
FLIP MANAGEMENT, LLC, BALBOA AVE COOPERATIVE,
CALIFORNIA CANNABIS GROUP, DEVILISH DELIGHTS, INC.,
CHRIS HAKIM, MIRA ESTE PROPERTIES, LLC and ROSELLE PROPERTIES, LLC,
Defendants-Appellants.

APPEAL FROM THE SUPERIOR COURT OF SAN DIEGO COUNTY
HONORABLE EDDIE C. STURGEON · CASE NO. 37-2018-000034229-CU-BC-CTL

**APPLICATION FOR PERMISSION TO FILE THEIR CERTIFICATE
OF INTERESTED ENTITIES OR PERSONS UNDER SEAL**

*DANIEL T. WATTS, ESQ. (277861)
LOUIS A. GALUPPO, ESQ. (143266)
G10 GALUPPO LAW, APLC
2792 Gateway Road, Suite 102
Carlsbad, California 92009
(760) 431-4575 Telephone
(760) 431-4579 Facsimile

*Attorneys for Appellants,
Ninus Malan, San Diego United Holdings Group, LLC,
Flip Management, LLC, Balboa Ave Cooperative,
California Cannabis Group and Devilish Delights, Inc.*



**APPLICATION FOR PERMISSION TO
FILE THEIR CERTIFICATE OF
INTERESTED ENTITIES OR PERSONS UNDER SEAL**

Pursuant to California Rule of Court 8.208(d)(2), Appellants, Ninus Malan, San Diego United Holdings Group, LLC, Flip Management, LLC, Balboa Ave Cooperative, California Cannabis Group and Devilish Delights, Inc. respectfully make this application for permission to file their Certificate of Interested Entities or Persons under seal.

All parties respectfully request to keep identity of any party or any entity or person subject to disclosure under this rule confidential, as ownership interests have not been publicly disclosed in the proceedings.

For these reasons, Appellants respectfully request that this Court grant this application for permission to file its Certificate of Interested Entities or Persons under seal. Counsel certifies that he has provided a copy of this application to his clients.

Dated: July 3, 2019

Respectfully submitted,

/s/ Daniel T. Watts
Daniel T. Watts
Attorneys for Appellants,
*Ninus Malan, San Diego United
Holdings Group, LLC, Flip
Management, LLC, Balboa Ave
Cooperative, California Cannabis Group
and Devilish Delights, Inc.*

DECLARATION OF DANIEL T. WATTS

I, Daniel T. Watts, declare as follows:

1. I am an attorney licensed to practice law in the State of California and I am an associate attorney with G10 Galuppo Law, APLC, appellate counsel for Defendants-Appellants Ninus Malan, San Diego United Holdings Group, LLC, Flip Management, LLC, Balboa Ave Cooperative, California Cannabis Group and Devilish Delights, Inc., in this matter. I have personal knowledge of the facts set forth herein, except where specifically stated on information and belief, and would testify competently hereto if called to do so.

2. My clients respectfully request that the Court keep identity of any party or any entity or person subject to disclosure under California Rule of Court 8.208(d)(2) confidential, as ownership interests have not been publicly disclosed in the proceedings.

3. Attached as Exhibit A hereto is the Certificate of Interested Parties the Appellants to file under seal, and Exhibit B, the redacted version.

4. I certify that I have delivered a copy of this application to my clients.

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

Executed on July 3, 2019, at Carlsbad, California.

/s/ Daniel T. Watts
Daniel T. Watts

EXHIBIT - A

CERTIFICATE OF INTERESTED PERSONS OR ENTITIES

Pursuant to California Rules of Court, Rule 8.208, the following persons or entities that have an interest in the outcome of this appeal:

- o Balboa Ave Cooperative, a non-profit mutual benefit corporation (owners of more than 10% interest include Ninus Malan)
- o Devilish Delights, Inc., a non-profit mutual benefit corporation (owners of more than 10% interest include Ninus Malan)
- o California Cannabis Group, a non-profit mutual benefit corporation (owners of more than 10% interest include Ninus Malan, Chris Hakim)
- o San Diego United Holdings Group, LLC (owners of more than 10% interest include Ninus Malan, Chris Hakim, Calgrow Trading, Inc.)
- o Mira Este Properties, LLC (owners of more than 10% interest include Ninus Malan, Chris Hakim)
- o Roselle Properties, LLC (owners of more than 10% interest include Ninus Malan, Chris Hakim)
- o Flip Management, LLC (owners of more than 10% interest include Ninus Malan)
- o Monarch Management Consulting, Inc. (owners of more than 10% interest include Ninus Malan, Chris Hakim)
- o Ninus Malan (owner/member-manager of non-profit mutual benefit corporations Balboa Ave Cooperative, Devilish Delights, Inc., California Cannabis Group, owner of more than 10% of San Diego United Holdings Group, LLC, Flip Management, LLC, Monarch Management Consulting, Inc., Roselle Properties, LLC, and Mira Este Properties, LLC; alleged owner of more than 10% of RM Property Holdings, LLC)
- o Calgrow Trading, Inc. (contingent owner of greater than 10% interest in San Diego United Holdings Group, LLC and Balboa Ave Cooperative)
- o Chris Hakim (owner/member-manager of California Cannabis Group, 50% owner of Mira Este Properties, LLC and Roselle Properties, LLC)
- o Salam Razuki (alleged owner of more than 10% of RM Property Holdings, LLC)
- o RM Property Holdings, LLC (alleged contingent owner of San Diego United, Mira Este, Roselle, Flip; allegedly owned by Salam Razuki and Ninus Malan)
- o SoCal Building Ventures, LLC (ownership unknown)
- o San Diego Building Ventures, LLC (ownership unknown)
- o Michael Essary (court-appointed receiver)

Dated: July 3, 2019

/s/ Daniel T. Watts

Daniel T. Watts

EXHIBIT - B

[REDACTED] CERTIFICATE OF INTERESTED PERSONS OR ENTITIES

Pursuant to California Rules of Court, Rule 8.208, the following persons or entities that have an interest in the outcome of this appeal:

- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]
- o [REDACTED]

Dated: July 2, 2019

/s/ Daniel T. Watts
Daniel T. Watts

**[PROPOSED] ORDER GRANTING APPELLANTS' APPLICATION
FOR PERMISSION TO FILE THEIR CERTIFICATE OF
INTERESTED ENTITIES OR PERSONS UNDER SEAL**

Appellants' Application for Permission to File Their Certificate of Interested Entities or Persons Under Seal was filed on July 3, 2019, with the above-entitled Court. The Court has considered the Application and supporting papers, as well as any opposition. Accordingly, and for good cause shown, the Court hereby GRANTS the Application. Appellants Ninus Malan, San Diego United Holdings Group, LLC, Flip Management, LLC, Balboa Ave Cooperative, California Cannabis Group and Devilish Delights, Inc., may file their Certificate of Interested Entities or Persons under seal.

IT IS SO ORDERED.

Dated: _____ By: _____
Presiding Justice

State of California)
County of Los Angeles)
)

Proof of Service by:
US Postal Service
Federal Express

I, Kirstin Largent, declare that I am not a party to the action, am over 18 years of age and my business address is: 626 Wilshire Blvd., Suite 820, Los Angeles, California 90017.

On 7/3/2019 declarant served the within: Appellants' Application to File Their Certificate of Interest Entities/Person Under Seal upon:

Copies FedEx USPS

ELECTRONICALLY SERVED ON:
Steven Anmar Elia, Esq.
Law Offices Of Steven A. Elia, APC
2221 Camino Del Rio South, Suite 207
San Diego, California 92108
steve@elialaw.com

Attorney for Respondent Salam Razuki

Copies FedEx USPS

ELECTRONICALLY SERVED ON:
Maura Griffin, Esq.
ATTORNEY AT LAW
2221 Camino Del Rio South, Suite 203
San Diego, California 92108
mg@mauragriffinlaw.com

Attorney for Respondent Salam Razuki

Copies FedEx USPS

ELECTRONICALLY SERVED ON:
James Joseph, Esq.
Elia Law Firm, APC
2221 Camino Del Rio South, Suite 207
San Diego, California 92108
james@elialaw.com

Attorney for Respondent Salam Razuki

Copies FedEx USPS

ELECTRONICALLY SERVED ON:
Charles F. Goria, Esq.
Goria, Weber & Jarvis
1011 Camino del Rio South, Suite 210
San Diego, California 92108
chasgoria@gmail.com
Attorney for Appellants Chris Hakim, Mira Este Properties, LLC and Roselle Properties, LLC

the address(es) designated by said attorney(s) for that purpose by depositing **the number of copies indicated above**, of same, enclosed in a postpaid properly addressed wrapper in a Post Office Mail Depository, under the exclusive custody and care of the United States Postal Service, within the State of California, or properly addressed wrapper in an Federal Express Official Depository, under the exclusive custody and care of Federal Express, within the State of California

I further declare that this same day the **original and** copies has/have been hand delivered for filing OR the **original and** copies has/have been filed by third party commercial carrier for next business day delivery to:

ELECTRONICALLY FILED ON THE
CALIFORNIA COURT OF APPEAL
Fourth Appellate District, Division One

I declare under penalty of perjury that the foregoing is true and correct:

Signature: /s/ Kirstin Largent

STATE OF CALIFORNIA
California Court of Appeal, Fourth
Appellate District Division 1

PROOF OF SERVICE

STATE OF CALIFORNIA
California Court of Appeal, Fourth
Appellate District Division 1

Case Name: **Razuki v. Malan et al.**

Case Number: **D075028**

Lower Court Case Number: **37-2018-000034229-CU-BC-
CTL**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **dwatts@galuppolaw.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
MOTION - MOTION (FEE PREVIOUSLY PAID)	D075028_Motion to Seal CIP_Malan et al - Appellants

Service Recipients:

Person Served	Email Address	Type	Date / Time
Daniel Watts G10 GALUPPO LAW, APLC	dwatts@galuppolaw.com	e-Serve	7/3/2019 4:25:45 PM
Charles Gorla Gorla, Weber & Jarvis	chasgorla@gmail.com	e-Serve	7/3/2019 4:25:45 PM
Steven Blake G10 Galuppo Law, APLC	sblake@galuppolaw.com	e-Serve	7/3/2019 4:25:45 PM
Andrew Hall G10 GALUPPO LAW, APLC	ahall@galuppolaw.com	e-Serve	7/3/2019 4:25:45 PM
Linda Koller	lkoller@galuppolaw.com	e-Serve	7/3/2019 4:25:45 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

7/3/2019

Date

/s/Linda Koller

Signature

Watts, Daniel (277861)

Last Name, First Name (PNum)

G10 Galuppo Law

Law Firm