

1 MATTHEW OSTER (State Bar No. 190541)
moster@wrslawyers.com

2 DAVIS C ADAMS (State Bar No. 331603)
dcadams@wrslawyers.com

3 WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
11400 West Olympic Boulevard, 9th Floor
4 Los Angeles, California 90064-1582
Telephone: (310) 478-4100
5 Facsimile: (310) 479-1422

6 Attorneys for Defendant HOLY TRINITY
ROMANIAN AMERICAN ORTHODOX
7 CHURCH

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11 THE ROMANIAN ORTHODOX
12 EPISCOPATE OF AMERICA, a Michigan
nonprofit religious corporation,

13 Plaintiff,

14 vs.

15 HOLY TRINITY ROMANIAN
16 AMERICAN ORTHODOX CHURCH
formerly known as HOLY TRINITY
17 ROMANIAN ORTHODOX CHURCH, a
California nonprofit corporation; ALL
18 PERSONS UNKNOWN, CLAIMING
19 ANY LEGAL OR EQUITABLE RIGHT,
20 TITLE, ESTATE, LIEN, OR INTEREST
IN THE PROPERTY DESCRIBED IN
21 THE COMPLAINT ADVERSE TO
PLAINTIFF'S TITLE, OR ANY CLOUD
ON PLAINTIFF'S THERETO; and DOES
22 1 through 10, inclusive,

23 Defendants.

Case No. 24STCV14954

**DEFENDANT HOLY TRINITY
ROMANIAN AMERICAN
ORTHODOX CHURCH'S ANSWER
TO VERIFIED COMPLAINT**

Assigned to
Hon. Maurice A. Leiter, Department 54

Trial Date: February 2, 2026

1 Defendant Holy Trinity Romanian American Orthodox Church (“Defendant”)
2 hereby answers the Verified Complaint (the “Complaint”) of Plaintiff The Romanian
3 Orthodox Episcopate of America (“Plaintiff”) as follows:

4 **ANSWER TO VERIFIED COMPLAINT**

5 **THE PARTIES**

6 1. In answering paragraph 1 of the Complaint, Defendant lacks information and
7 belief sufficient to admit or deny the allegations contained therein and on that basis denies
8 each and every allegation contained therein.

9 2. In answering paragraph 2, Defendant admits that Defendant Holy Trinity
10 Romanian American Orthodox Church, formerly known as Holy Trinity Romanian
11 Orthodox Church, is a California nonprofit corporation with its headquarters in Los
12 Angeles, California. Defendant denies each and every remaining allegation in such
13 paragraph, except as are expressly admitted herein.

14 3. In answering paragraph 3 of the Complaint, Defendant lacks information and
15 belief sufficient to admit or deny the allegations contained therein and on that basis denies
16 each and every allegation contained therein.

17 4. In answering paragraph 4 of the Complaint, Defendant lacks information and
18 belief sufficient to admit or deny the allegations contained therein and on that basis denies
19 each and every allegation contained therein.

20 **JURISDICTION AND VENUE**

21 5. In answering paragraph 5 of the Complaint, Defendant admits the allegations
22 contained therein.

23 6. Defendant denies each and every allegation in paragraph 6 of the Complaint.

24 7. Defendant denies each and every allegation in paragraph 7 of the Complaint.

25 **GENERAL ALLEGATIONS**

26 8. In answering paragraph 8 of the Complaint, Defendant lacks information and
27 belief sufficient to admit or deny the allegations that Plaintiff was established in about
28 1930 and its Constitution and By-Laws were created in about 1932, and on that basis

1 denies each and every allegation contained therein. Defendant lacks information and belief
2 sufficient to admit or deny that Plaintiff's Constitution and By-Laws are set forth on
3 Plaintiff's website, [https://roea.org/files/Official-Documents/Const-Bv-Laws-](https://roea.org/files/Official-Documents/Const-Bv-Laws-ENGLISH.pdf)
4 ENGLISH.pdf, and on that basis, denies such allegation. Defendant lacks information and
5 belief sufficient to admit or deny that in or about 1943, Plaintiff was incorporated in
6 Michigan as a nonprofit religious corporation and denies such allegation on that basis.
7 Defendant admits that Plaintiff included many parishes throughout the United States.
8 Defendant denies each and every remaining allegation in such paragraph, except as are
9 expressly admitted herein.

10 9. In answering paragraph 9 of the Complaint, Defendant lacks information and
11 belief sufficient to admit or deny the allegations contained therein and on that basis denies
12 each and every allegation contained therein.

13 10. In answering paragraph 10 of the Complaint, Defendant lacks information
14 and belief sufficient to admit or deny the allegations contained therein and on that basis
15 denies each and every allegation contained therein.

16 11. In answering paragraph 11 of the Complaint, Defendant admits that its
17 amended Articles of Incorporation dated May 31, 1998, state that Defendant "submits
18 itself to the administrative and canonical jurisdiction and supervision of the Romanian
19 Orthodox Episcopate of America," and that it will "govern itself according to the
20 Constitution and By-Laws of the said Romanian Orthodox Episcopate of America" and
21 "conduct and manage its affairs in accordance with the said By-Laws." Defendant denies
22 all remaining allegations in paragraph 11.

23 12. In answering paragraph 12 of the Complaint, Defendant admits all
24 allegations contained therein.

25 13. In answering paragraph 13 of the Complaint, Defendant denies all
26 allegations contained therein.

27 14. In answering paragraph 14 of the Complaint, Defendant admits that in or
28 about 1982, Plaintiff appointed Father Constantin Alecse as the parish priest for

1 Defendant. Defendant admits that Fr. Alecse continues to serve as its parish priest.

2 Defendant denies all remaining allegations contained in paragraph 14.

3 15. In answering paragraph 15 of the Complaint, Defendant admits all
4 allegations contained therein.

5 16. In answering paragraph 16 of the Complaint, Defendant denies all
6 allegations contained therein.

7 17. In answering paragraph 17 of the Complaint, Defendant admits that, on or
8 about August 14, 2022, Defendant's Board of Directors/Parish Council held a meeting at
9 which a quorum was present and voted to disassociate from Plaintiff. Defendant admits
10 that its Board of Directors/Parish Council also voted to join the Romanian Canonical
11 Orthodox nonprofit entity, ROMA-Romanian Orthodox Metropolia of the Americas,
12 effective immediately upon adjournment of such meeting. Defendant admits that, on or
13 about September 25, 2022, Defendant's Parish Council signed a written "Resolution to
14 Disassociate HTROC from ROEA." Defendant denies all the remaining allegations
15 contained therein.

16 18. In answering paragraph 18 of the Complaint, Defendant admits that, on or
17 about October 18, 2022, Defendant filed amended Articles of Incorporation with the
18 California Secretary of State. Defendant also admits that the amended Articles of
19 Incorporation state that the name "Holy Trinity Romanian Orthodox Church" is changed to
20 "Holy Trinity Romanian American Orthodox Church." Defendant further admits that
21 amended Articles of Incorporation further state that the property of the Defendant, on
22 dissolution or winding up, will be distributed to a nonprofit fund, foundation or
23 corporation which is organized and operated exclusively for religious purposes and which
24 has established its tax exempt status under Internal Revenue Code Section 501(c)(3).
25 Defendant denies all the remaining allegations contained therein.

26 19. In answering paragraph 19 of the Complaint, Defendant lacks information
27 and belief sufficient to admit or deny the allegations contained therein and on that basis
28 denies each and every allegation contained therein.

1 20. In answering paragraph 20 of the Complaint, Defendant lacks information
2 and belief sufficient to admit or deny the allegations contained therein and on that basis
3 denies each and every allegation contained therein.

4 21. In answering paragraph 21 of the Complaint, Defendant lacks information
5 and belief sufficient to admit or deny the allegations contained therein and on that basis
6 denies each and every allegation contained therein.

7 22. In answering paragraph 22 of the Complaint, Defendant denies all
8 allegations contained therein.

9 23. In answering paragraph 23, Defendant lacks information and belief sufficient
10 to admit or deny the allegations contained therein and on that basis denies each and every
11 allegation contained therein.

12 24. In answering paragraph 24 of the Complaint, Defendant admits all
13 allegations contained therein.

14 25. In answering paragraph 25, Defendant denies all allegations contained
15 therein as the documents referenced in paragraph 25 speak for themselves and any attempt
16 to interpret or summarize said documents is improper at this time.

17 26. In answering paragraph 26, Defendant denies all allegations contained
18 therein as the documents referenced in paragraph 26 speak for themselves and any attempt
19 to interpret or summarize said documents is improper at this time.

20 27. In answering paragraph 27, Defendant denies all allegations contained
21 therein as the documents referenced in paragraph 27 speak for themselves and any attempt
22 to interpret or summarize said documents is improper at this time.

23 **FIRST CAUSE OF ACTION**

24 **(DECLARATORY RELIEF)**

25 28. Defendant incorporates by reference each denial, defense, and response
26 stated in paragraphs 1 through 27 of this answer as though fully stated herein.

27 29. In answering paragraph 29, Defendant denies all allegations contained
28 therein.

1 30. In answering paragraph 30, Defendant lacks information and belief sufficient
2 to admit or deny the allegations contained therein and on that basis denies each and every
3 allegation contained therein.

4 31. In answering paragraph 31, Defendant denies all allegations contained
5 therein.

6 32. In answering paragraph 32, Defendant avers that the Court should adopt the
7 “neutral principles of law” approach as set forth by the California Supreme Court in
8 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
9 allegations contained therein.

10 33. In answering paragraph 33, Defendant admits that the Court should adopt the
11 “neutral principles of law” approach as set forth by the California Supreme Court in
12 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
13 allegations contained therein.

14 **SECOND CAUSE OF ACTION**

15 **(QUIET TITLE TO REAL PROPERTY)**

16 34. Defendant incorporates by reference each denial, defense, and response
17 stated in paragraphs 1 through 33 of this answer as though fully stated herein.

18 35. In answering paragraph 35, Defendant lacks information and belief sufficient
19 to admit or deny the allegations contained therein and on that basis denies each and every
20 allegation contained therein.

21 36. In answering paragraph 36, Defendant denies all allegations contained
22 therein.

23 37. In answering paragraph 37, Defendant denies all allegations contained
24 therein.

25 38. In answering paragraph 38, Defendant denies that Plaintiff is the
26 hierarchical church which has jurisdiction over and which governs Defendant. Defendant
27 denies any and all other allegations contained therein as the documents referenced in
28

1 paragraph 38 speak for themselves and any attempt to interpret or summarize said
2 documents is improper at this time.

3 39. In answering paragraph 39, Defendant avers that that the Court should adopt
4 “neutral principles of law” approach as set forth by the California Supreme Court in
5 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
6 allegations contained therein.

7 40. In answering paragraph 40, Defendant admits that the Court should adopt the
8 “neutral principles of law” approach as set forth by the California Supreme Court in
9 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
10 allegations contained therein.

11 **THIRD CAUSE OF ACTION**

12 **(QUIET TITLE TO PERSONAL PROPERTY)**

13 41. Defendant incorporates by reference each denial, defense, and response
14 stated in paragraphs 1 through 40 of this answer as though fully stated herein.

15 42. In answering paragraph 42, Defendant denies all allegations contained
16 therein.

17 43. In answering paragraph 43, Defendant denies all allegations contained
18 therein on the basis that they are requests for relief that do not allege any facts requiring
19 response.

20 **FOURTH CAUSE OF ACTION**

21 **(DECLARATORY RELIEF-REAL PROPERTY)**

22 44. Defendant incorporates by reference each denial, defense, and response
23 stated in paragraphs 1 through 43 of this answer as though fully stated herein.

24 45. In answering paragraph 45, Defendant denies all allegations contained
25 therein.

26 46. In answering paragraph 46, Defendant denies all allegations contained
27 therein.

47. In answering paragraph 47, Defendant denies all allegations contained therein.

48. In answering paragraph 48, Defendant avers that that the Court should adopt “neutral principles of law” approach as set forth by the California Supreme Court in *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other allegations contained therein.

49. In answering paragraph 49, Defendant admits that the Court should adopt the “neutral principles of law” approach as set forth by the California Supreme Court in *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other allegations contained therein

FIFTH CAUSE OF ACTION

(DECLARATORY RELIEF-FUNDS)

50. Defendant incorporates by reference each denial, defense, and response stated in paragraphs 1 through 49 of this answer as though fully stated herein.

51. In answering paragraph 51, Defendant denies all allegations contained therein.

52. In answering paragraph 52, Defendant denies all allegations contained therein.

53. In answering paragraph 53, Defendant denies all allegations contained therein.

54. In answering paragraph 54, Defendant avers that that the Court should adopt “neutral principles of law” approach as set forth by the California Supreme Court in *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other allegations contained therein.

55. In answering paragraph 55, Defendant admits that the Court should adopt the “neutral principles of law” approach as set forth by the California Supreme Court in *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other allegations contained therein

1 56. In answering paragraph 56, Defendant denies all allegations contained
2 therein.

3 **SIXTH CAUSE OF ACTION**

4 **(DECLARATORY PERSONAL PROPERTY)**

5 57. Defendant incorporates by reference each denial, defense, and response
6 stated in paragraphs 1 through 56 of this answer as though fully stated herein.

7 58. In answering paragraph 58, Defendant denies all allegations contained
8 therein.

9 59. In answering paragraph 59, Defendant denies all allegations contained
10 therein.

11 60. In answering paragraph 60, Defendant denies all allegations contained
12 therein.

13 61. In answering paragraph 61, Defendant avers that that the Court should adopt
14 “neutral principles of law” approach as set forth by the California Supreme Court in
15 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
16 allegations contained therein.

17 62. In answering paragraph 62, Defendant admits that the Court should adopt the
18 “neutral principles of law” approach as set forth by the California Supreme Court in
19 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
20 allegations contained therein

21 63. In answering paragraph 63, Defendant denies all allegations contained
22 therein.

23 **SEVENTH CAUSE OF ACTION**

24 **(ACCOUNTING)**

25 64. Defendant incorporates by reference each denial, defense, and response
26 stated in paragraphs 1 through 63 of this answer as though fully stated herein.

27 65. In answering paragraph 65, Defendant denies all allegations contained
28 therein.

1 66. In answering paragraph 66, Defendant denies all allegations contained
2 therein.

3 67. In answering paragraph 67, Defendant denies all allegations contained
4 therein.

5 68. In answering paragraph 68, Defendant admits all allegations contained
6 therein

7 69. In answering paragraph 69, Defendant avers that that the Court should adopt
8 “neutral principles of law” approach as set forth by the California Supreme Court in
9 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
10 allegations contained therein.

11 70. In answering paragraph 70, Defendant admits that the Court should adopt the
12 “neutral principles of law” approach as set forth by the California Supreme Court in
13 *Episcopal Church Cases* (2009) 45 Ca1.4th 467. Defendant denies any and all other
14 allegations contained therein

15 71. In answering paragraph 71, Defendant denies all allegations contained
16 therein.

17 **EIGHTH CAUSE OF ACTION**

18 **(CONSTRUCTIVE TRUST)**

19 72. Defendant incorporates by reference each denial, defense, and response
20 stated in paragraphs 1 through 71 of this answer as though fully stated herein.

21 73. In answering paragraph 73, Defendant denies all allegations contained
22 therein.

23 74. In answering paragraph 74, Defendant denies all allegations contained
24 therein.

25 75. In answering paragraph 75, Defendant denies all allegations contained
26 therein.

27 **PRAYER FOR RELIEF**

1 In answering the Prayer For Relief, Defendant denies any and all allegations
2 contained therein.

3 **FIRST AFFIRMATIVE DEFENSE**

4 **(Failure to State a Cause of Action)**

5 1. This answering Defendant alleges that the Complaint and each purported
6 cause of action set forth therein, or some of them, fail to state facts sufficient to constitute
7 a cause of action against this answering Defendant upon which relief can be granted.

8 **SECOND AFFIRMATIVE DEFENSE**

9 **(Unjust Enrichment)**

10 2. This answering Defendant alleges that the Complaint and each purported
11 cause of action set forth therein is barred by the doctrine of unjust enrichment in that, if
12 Plaintiff was allowed to recover on its claims, it would be unjustly enriched and would
13 obtain benefits in excess of alleged damages incurred, if any.

14 **THIRD AFFIRMATIVE DEFENSE**

15 **(Estoppel)**

16 3. This answering Defendant alleges that the Complaint and each purported
17 cause of action set forth therein, or some of them, are barred by the doctrine of estoppel.

18 **FOURTH AFFIRMATIVE DEFENSE**

19 **(Waiver)**

20 4. This answering Defendant alleges that the Complaint and each purported
21 cause of action set forth therein, or some of them, are barred, in whole or in part, by the
22 doctrine of waiver.

23 **FIFTH AFFIRMATIVE DEFENSE**

24 **(Excuse)**

25 5. This answering Defendant alleges that the Complaint and each purported
26 cause of action set forth therein, or some of them, are barred, in whole or in part, to the
27 extent that any duties, obligations, actions, and/or failures to act were excused by the
28 conduct, breaches, or non-performance of Plaintiff or other parties.

1 **SIXTH AFFIRMATIVE DEFENSE**

2 **(Unclean Hands)**

3 6. This answering Defendant alleges that Plaintiff and each purported cause of
4 action set forth therein, or some of them, are barred by the doctrine of unclean hands.

5 **SEVENTH AFFIRMATIVE DEFENSE**

6 **(Assumption of Risk)**

7 7. This answering Defendant alleges that any damages or injury allegedly
8 suffered by Plaintiff, if any, were caused by risks of which Plaintiff was aware and which
9 Plaintiff voluntarily assumed.

10 **EIGHTH AFFIRMATIVE DEFENSE**

11 **(Failure to Mitigate Damages)**

12 8. Any damages allegedly incurred by Plaintiff, if any, are the result, in whole
13 or in part, of Plaintiff's failure to exercise reasonable care to reduce or mitigate its alleged
14 damages, and by virtue of this failure, Plaintiff's recovery must be barred or reduced by
15 the amount of those damages which Plaintiff failed to mitigate.

16 **NINTH AFFIRMATIVE DEFENSE**

17 **(Offset)**

18 9. This answering Defendant alleges that the Complaint and each purported
19 cause of action set forth therein, or some of them, are barred, in whole or in part, by rights
20 of offset or setoff against Plaintiff.

21 **TENTH AFFIRMATIVE DEFENSE**

22 **(Statute of Limitations)**

23 10. This answering Defendant alleges that the Complaint and each purported
24 cause of action set forth therein, or some of them, are barred by the applicable statutes of
25 limitations, including Code of Civil Procedure sections 337, 337a, 338, 339, 340.

26 **ELEVENTH AFFIRMATIVE DEFENSE**

27 **(Proximate Cause)**

28 11. Any damages allegedly suffered by Plaintiff are the direct and proximate

1 result of Plaintiff's own acts, omissions and conduct.

2 **TWELFTH AFFIRMATIVE DEFENSE**

3 **(Ratification of Acts)**

4 12. Plaintiff's complaint and each cause of action thereof are barred by reason of
5 Plaintiff's ratification of Defendant's alleged conduct.

6 **THIRTEENTH AFFIRMATIVE DEFENSE**

7 **(Business Purposes)**

8 13. Plaintiff's Complaint and each cause of action thereof are barred by reason
9 of the fact that the acts alleged to have been committed by Defendant were privileged and
10 committed in the exercise of legitimate and lawful business purposes.

11 **FOURTEENTH AFFIRMATIVE DEFENSE**

12 **(Judicial Reference)**

13 14. Pursuant to the governing documents, this dispute must be resolved through
14 judicial reference.

15 **FIFTEENTH AFFIRMATIVE DEFENSE**

16 **(Superseding Cause)**

17 15. Defendant alleges that superseding actions of at least one third party caused
18 any injuries allegedly suffered by Plaintiff herein, if any, such that these answering
19 Defendant is not responsible for any such alleged injuries, if any.

20 **SIXTEENTH AFFIRMATIVE DEFENSE**

21 **(No Duty Owed)**

22 16. Defendant alleges that no duty was owed to Plaintiff with respect to the
23 matters averred in the complaint. To the extent that Defendant may be found to have had a
24 duty to Plaintiff, Defendant satisfactorily and reasonably fulfilled such duty.

25 **SEVENTEENTH AFFIRMATIVE DEFENSE**

26 **(Avoidable Consequences Doctrine)**

27 17. Defendant alleges that the Complaint and each of its causes of action are
28 barred, in whole or in part, by Plaintiff's failure to exercise reasonable care and diligence

1 to avoid harm or loss that could have reasonably been prevented by such reasonable
2 efforts.

3 **EIGHTEENTH AFFIRMATIVE DEFENSE**

4 **(Standing)**

5 18. Defendant alleges that that Plaintiff lacks standing to bring this action;
6 therefore, Plaintiff is barred from seeking any affirmative relief against these answering
7 defendants.

8 **NINETEENTH AFFIRMATIVE DEFENSE**

9 **(No Privity)**

10 19. Defendant is informed and believes and based thereon alleges that Plaintiff
11 lacks privity to assert the Complaint, or any causes of action therein, against this answering
12 Defendant.

13 **RESERVATION OF ADDITIONAL DEFENSES**

14 Defendant presently has insufficient knowledge or information, or pleading notice,
15 upon which to form a belief as to whether there may be additional affirmative defenses,
16 and Defendant thereby reserves the right to assert additional affirmative defenses in the
17 event discovery or other investigation indicates such defenses would be appropriate.
18 Defendant will seek leave of this Court to amend this Answer should they later discover
19 facts demonstrating the existence of additional affirmative defenses.

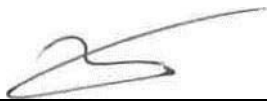
20
21 WHEREFORE, Defendants pray for judgment as follows:

- 22 1. That Plaintiff takes nothing by its Complaint;
23 2. For costs of suit incurred herein; and,
24 3. For such other relief as the Court deems proper.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: November 11, 2024

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP

By: 
MATTHEW OSTER

Attorneys for Defendant HOLY TRINITY
ROMANIAN AMERICAN ORTHODOX
CHURCH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFICATION

I have read the foregoing **DEFENDANT HOLY TRINITY ROMANIAN AMERICAN ORTHODOX CHURCH'S ANSWER TO VERIFIED COMPLAINT** and know its contents.

I am an Officer of **HOLY TRINITY ROMANIAN AMERICAN ORTHODOX CHURCH**, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on November 8, 2024, at Los Angeles, CA.

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

Rajitha Dissanayake	
_____ Print Name of Signatory	_____ Signature

1 **PROOF OF SERVICE**

2 **Case No. 24STCV14954**

3 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

4 At the time of service, I was over 18 years of age and not a party to this action. I
5 am employed in the County of Los Angeles, State of California. My business address is
6 11400 West Olympic Boulevard, 9th Floor, Los Angeles, CA 90064-1582.

7 On November 11, 2024, I served true copies of the following document(s) described
8 as **DEFENDANT HOLY TRINITY ROMANIAN AMERICAN ORTHODOX**
9 **CHURCH'S ANSWER TO VERIFIED COMPLAINT** on the interested parties in this
10 action as follows:

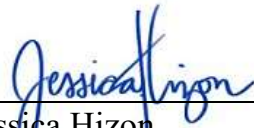
11 Paul E. Gaspari
12 Benjamin J. Lewis
13 Audrey A. Millemann
14 WEINTRAUB TOBIN CHEDIAK
15 COLEMAN GRODIN, LAW
CORPORATION
475 Sansome Street, Suite 510
San Francisco, CA 94111
Email: pgaspari@weintraub.com
Email: blewis@weintraub.com
Email: amillemann@weintraub.com
Email: daguillen@weintraub.com
Email: mcooper@weintraub.com

Attorneys for Plaintiff The Romanian
Orthodox Episcopate of America

16 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
17 document(s) to be sent from e-mail address jhizon@wrslawyers.com to the persons at the
18 e-mail addresses listed in the Service List. I did not receive, within a reasonable time after
the transmission, any electronic message or other indication that the transmission was
unsuccessful.

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

21 Executed on November 11, 2024, at Los Angeles, California.

22 
23 _____
24 Jessica Hizon
25
26
27
28