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15 Attorneys for Plaintiffs
16 Anaheim Japanese Free Methodist Church
17 and Debra Chiya

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF ORANGE**
14 **CENTRAL JUSTICE CENTER**

15 ANAHEIM JAPANESE FREE
16 METHODIST CHURCH, a California
17 Nonprofit Religious Corporation, DEBRA
18 CHIYA, member, board member and
19 corporate treasurer;

20 Plaintiffs,

21 vs.

22 THE VOICE CHURCH OF ORANGE
23 COUNTY, INC., a California Nonprofit
24 Religious Corporation, TAKA IGUCHI, as
25 an individual and officer; PACIFIC
26 COAST JAPANESE CONFERENCE OF
27 FREE METHODIST CHURCH OF
28 NORTH AMERICA, a California
Nonprofit Religious Corporation; and
DOES 1 through 50, inclusive,

Defendants.

**CASE NO. 30-2023-01322048-CU-PP-
NJC**

**DECLARATION OF BRUCE L.
ISHIMATSU RE EX PARTE NOTICE**

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I, BRUCE L. ISHIMATSU, declare as follows:

1. I am co-counsel of record for Plaintiffs Anaheim Japanese Free Methodist Church and Debra Chiya in this action. I make this declaration in support of the service of *ex parte* notice of Plaintiffs' Application for Temporary Restraining Order on calendar for May 3, 2023 at 9:00 a.m.

2. I am a member in good standing with the State Bar of California and competent to declare to the matters stated herein which are based on my personal knowledge.

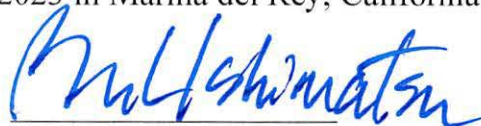
3. Today, May 2, 2023, prior to 10:00 a.m., I emailed written *ex parte* notice to Bradley Greenman, Esq., Defendants' counsel notifying him of Plaintiffs' intent to move the Court *ex parte* on May 3, 2023 at 9:00 a.m. requesting issuance of a Temporary Restraining Order ("TRO") and an Order to Show Cause be calendared for a Preliminary Injunction in Department N16 of the aforementioned Court.

4. Attached hereto as Exhibit "A" is a true and correct copy of my *ex parte* notice letter dated May 2, 2023 which I emailed to Defendants' counsel as indicated above.

5. Prior to 12:00 p.m. today, I will email Defendants' counsel copies of Plaintiffs' TRO papers in accordance with the Court's rules.

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

Executed on this 2nd day of May, 2023 in Marina del Rey, California.



Bruce L. Ishimatsu

Exhibit “A”

Ishimatsu Law Group
a professional corporation

4712 Admiralty Way, No. 1012
Marina del Rey, California 90292

t. 310.200.4060
f. 310.496.1540
e. bruce@ishimatsulaw.com

Via Email: bgreenman@tylerlawllp.com

May 2, 2023 (at 9:30 a.m.)

Bradley R. Greenman, Esq.
Tyler Law, LLP
25026 Las Brisas Road
Murrieta, California 92562

Re: *Ex Parte* Notice of Application for Temporary Restraining Order in *Anaheim Japanese Free Methodist Church, et al. v. The Voice Church of Orange County, Inc., Taka Iguchi, and Pacific Coast Japanese Conference of the Free Methodist Church of North America, et al.* (Case No. 30-2023-01322048-CU-PP-NJC)

Dear Mr. Greenman,

This letter is being sent to you as legal counsel who has accepted service of process of the Verified Complaint in the above action on behalf of the named Defendants.

On behalf of the Plaintiffs in the above action, we are hereby giving you notice that on **May 3, 2023 at 9:00 a.m.**, Plaintiffs will move *ex parte* in **Department N16** (Judge Donald F. Gaffney) of the Orange County Superior Court, North Justice Center, located at 1275 North Berkeley Avenue, Fullerton, California 92838 to request issuance of a Temporary Restraining Order (“TRO”) and an Order to Show Cause re Preliminary Injunction.

The TRO will seek to restrain your clients from the following:

1. Changing the name of the Anaheim Free Methodist Church (“AFMC”); and
2. Interfering with Plaintiffs’ use and occupation of the property on which AFMC operates; and
3. Removing the board of directors and other officers of the AFMC; and
4. Controlling and accessing AFMC’s funds and bank accounts; and
5. Terminating or replacing any members of the church staff, and

6. Entering into any contracts that seek to obligate AFMC for payment; and
7. Altering AFMC's online accounts (website, and social media); and
8. Installing "VOICE" marketing materials on AFMC property; and
9. Merging AFMC into The Voice Church of Orange County.

I will email you copies of our TRO papers before Noon today.

Let me know if you will oppose the TRO.

Very truly yours,

Bruce L. Ishimatsu

Bruce L. Ishimatsu