

1 ROB BONTA
Attorney General of California
2 LISA W. CHAO
Supervising Deputy Attorney General
3 DOUGLAS J. BETETA
Deputy Attorney General
4 State Bar No. 260377
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013-1230
Telephone: (213) 269-6014
6 Fax: (916) 731-2144
E-mail: Douglas.Beteta@doj.ca.gov

7 *Attorneys for Petitioner Insurance Commissioner of*
8 *the State of California, in his capacity as the*
Liquidator of Western General Insurance Company

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/30/2026 3:53 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By M. Ismael, Deputy Clerk

Exempt from Filing Fees Pursuant to
Government Code §6103

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12 CENTRAL DISTRICT

13 **INSURANCE COMMISSIONER OF THE**
14 **STATE OF CALIFORNIA,**

Petitioner,

15
16 v.

17 **WESTERN GENERAL INSURANCE**
18 **COMPANY,**

Respondent.

Case No. 21STCP01655

DECLARATION OF DOUGLAS J.
BETETA IN SUPPORT OF INSURANCE
COMMISSIONER'S MOTION TO
CONFIRM DISTRIBUTION PURSUANT
TO LANDLORD PROOF OF CLAIM

Date: December 11, 2026
Time: 9:30 a.m.
Dept: 833
Judge: The Honorable Joseph Lipner
Trial Date: N/A
Action Filed: May 21, 2021

1 I, Douglas J. Beteta, declare:

2 1. I am the attorney of record herein for Petitioner Ricardo Lara, Insurance
3 Commissioner of the State of California (Commissioner). I am an attorney at law, duly authorized
4 to practice before all courts of the State of California and this Court and am a Deputy Attorney
5 General for the California Office of the Attorney General, which represents the Commissioner in
6 this action. I have personal knowledge of the facts recited herein, and if called and sworn, would
7 competently so testify.

8 2. I am on the service list for the above-captioned action and I have checked the Court's
9 online docket. As of the date of this declaration, no party has filed an order to show cause or any
10 other pleading challenging the determination letter attached as Exhibit 1 to the concurrently filed
11 declaration of Scott Pearce.

12 3. Attached to the concurrently filed Request for Judicial Notice as Exhibit 3 is a true
13 and correct copy of the December 15, 2025 Minute Order Granting Motion for Order for
14 Appointment of Receiver and Issuance of Preliminary Injunction in Aid of Receiver filed in the
15 matter of *Wells Fargo Bank v. RBE 29899 Agoura LLC et al.*, Superior Court of the State of
16 California for the County of Los Angeles, Case No. 25VECV0281.

17 4. Attached to the concurrently filed Request for Judicial Notice as Exhibit 4 is a true
18 and correct copy of the December 15, 2025 Order for Appointment of Receiver and Issuance of
19 Preliminary Injunction filed in the matter of *Wells Fargo Bank v. RBE 29899 Agoura LLC et al.*,
20 Superior Court of the State of California for the County of Los Angeles, Case No. 25VECV0281.

21 5. I found and pulled Exhibits 3 and 4 from the docket search function on Lexis.com.
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on September 25, 2026, in South Pasadena, California.

25 

26 _____
27 Douglas J. Beteta
28

DECLARATION OF ELECTRONIC SERVICE AND SERVICE BY U.S. MAIL

Case Name: Insurance Commissioner v. Western General Insurance Co.
Case Number: 21STCP01655
Party Represented: Insurance Commissioner of the State of California, in his capacity as
the Liquidator of Western General Insurance Company

Declaration of Electronic Service

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, County of Los Angeles.
3. My electronic service address is Cindy.Pain@doj.ca.gov.
4. On September 28, 2026, I electronically served the following document[s]:

**DECLARATION OF DOUGLAS J. BETETA IN SUPPORT OF INSURANCE
COMMISSIONER'S MOTION TO CONFIRM DISTRIBUTION PURSUANT TO
LANDLORD PROOF OF CLAIM**

5. I electronically served the aforementioned document[s] by emailing them to the following individual[s]:

See Attached Service List

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on September 28, 2026.

Cindy Pain
Declarant

/s/ Cindy Pain
Signature

Declaration of Service by U.S. Mail

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 300 South Spring Street, Suite 1702, Los Angeles, CA 90013-1230, County of Los Angeles.
3. On September 28, 2026, I served the following document[s]:

**DECLARATION OF DOUGLAS J. BETETA IN SUPPORT OF INSURANCE
COMMISSIONER'S MOTION TO CONFIRM DISTRIBUTION PURSUANT TO
LANDLORD PROOF OF CLAIM**

4. I served the aforementioned documents by mailing them to the following individual[s]:

See Attached Service List

5. I am readily familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
6. On September 28, 2026, I enclosed the documents identified in paragraph [3] in a sealed envelope or package addressed to the persons at the address listed in paragraph [4] and placed the envelope for collection and mailing, following our ordinary business practices.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on September 28, 2026.

L. Siaumau

/s/ L. Siaumau

Declarant

Signature

LA2020603913
68760259

DECLARATION OF SERVICE BY E-MAIL and U.S. MAIL

Case Name: **Insurance Commissioner v. Western General Insurance Co.**

Case No.: **21STCP01655**

John E. McPherson, Esq.
Hinshaw & Culbertson LLP
350 South Grand Ave., Suite 3600
Los Angeles, CA 90071-3476
E-mail: jmcpherson@hinshawlaw.com
Attorneys for Western General Insurance Company

Chris Neilson
Trigild IVL
390 N. Pacific Coast Highway, Suite 3100
El Segundo, CA 90245
(858) 242-1222
E-mail: Chris.Neilson@trigild.com

Colorado Calabasas LLC
c/o Norman Kravetz
21800 Oxnard Street, Suite 500
Woodland Hills, CA 91367
E-mail: nkravetz@rbelc.com

David Wallace, ESQ
General Counsel, Trigild IVL
RE: Receivership Estate of RBE 29899
Agoura, LLC, et al.
8111 Douglas Ave., Ste. 600
Dallas, TX 75225
E-mail: David.Wallace@trigild.com

Warner World, LLC
c/o Norman Kravetz
21800 Oxnard Street, Suite 500
Woodland Hills, CA 91367
E-mail: nkravetz@rbelc.com

Norman Kravetz
Warner World, LLC
c/o Robert Plotkowski, ESQ
2121 Avenue of the Stars, Ste. 2600
Los Angeles, CA 90067-5050

PERKINS COIE LLP
Ronald A. McIntire,
E-mail: RMcIntire@perkinscoie.com
1888 Century Park East, Suite 1700
Los Angeles, California 90067-1721
Telephone: (310) 788-9900
Facsimile: (310) 788-3399
Counsel for Wells Fargo Bank