

**LAW OFFICES OF**  
**JAYAN HONG**

3600 Wilshire Blvd., Ste 1914  
Los Angeles, CA 90010  
Tel: (213) 222-6560  
Fax: (213) 985-1545

Jayan Hong  
Jay@HongLawOffices.com

April 18, 2018

**VIA REGULAR MAIL AND EMAIL TO: RMK@CORPMGT.COM**

Richard Kipperman  
8324 Allison Avenue  
La Mesa, CA 91942

**RE: Neighborhood Market Association, Inc.**  
**Demand for Action to Protect NMA**

Mr. Kipperman:

Our firm has been retained by Mr. Joe Yousif, a former Neighborhood Market Association, Inc. (the "NMA") Executive Board member, Mr. Esia Joby, a former NMA Treasurer and Executive Board member, and Mr. Isam Mansour, a former NMA Executive Board member. Messrs. Yousif, Joby and Mansour are also current members of the NMA.

It has come to our attention that the plaintiffs in the well-publicized lawsuit against Mr. Mark Arabo, the former President of the NMA, are attempting to obtain a judgment against the NMA in the amount of approximately \$1.8M. It has also come to our attention that you, the court-appointed receiver of the NMA, are refusing to take any action whatsoever to oppose their efforts. We were informed that you have even rejected the NMA's request to prepare a simple declaration to the court explaining the NMA's current financial condition and expected earnings in 2018, and that such a judgment would, in all likelihood, cause the NMA to file for bankruptcy and ultimately dissolve.

It is difficult to understand why you are quite proactive on certain issues that you deem to be in the NMA's best interest but are not willing to take a position against the plaintiffs' pending motion for fees and costs, which will have a far more devastating effect on the NMA.

This is a demand that you take action to oppose the plaintiffs' request for fees and costs no later than 10:00 a.m. tomorrow, April 19, 2018, and to confirm the same. Your refusal to take such action constitutes a breach of your duties to the NMA - the very organization that you have been entrusted to protect. If you do not either join the opposition of the NMA's current counsel or oppose the fees request vigorously in another manner, our clients will take any and all lawful action to protect the NMA's interests. Such action will include initiating formal legal proceedings against you for failure to faithfully discharge your duties to the NMA.

Richard Kipperman

April 18, 2018

Page 2 of 2

Should you have any questions, please feel free to contact me at (213) 222-6560.

Best regards,

A handwritten signature in black ink, appearing to read 'Jayan Hong', written in a cursive style.

Jayan Hong, Esq.