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12 STATE OF CALIFORNIA
13 NEW MOTOR VEHICLE BOARD
14

15 In the Matter of the Protests of
16 MCCONNELL CHEVROLET BUICK,
INC.

17 Protestant,

18 v.

19 GENERAL MOTORS LLC,

20 Respondent.
21

Protest Nos.: PR 2382-14
PR 2383-14

**DECLARATION OF MILAN
GOLUSIN**

Hearing Date: March 17, 2014
Time: 10:00 a.m.
ALJ: Anthony M. Skrocki

22 I, Milan Golusin, declare and state:

23 1. I am employed by Channel Vantage, Inc., which supplies dealer contractual
24 services to respondent General Motors LLC ("GM"). I have personal knowledge of the
25 matters set forth herein and could and would competently testify thereto.

26 2. As part of my job responsibilities I handle contacts with authorized GM
27 dealers concerning contractual matters. In 2013, I had a number of such contacts with
28 respect to Protestant McConnell Chevrolet Buick, Inc. (the "McConnell dealership"),

1 which formerly operated an authorized Chevrolet and Buick dealership in Gridley,
2 California pursuant to two General Motors Dealer Sales and Service Agreements (“Dealer
3 Agreements”).

4 3. In June 2013, GM delivered notices to the McConnell dealership and its
5 Dealer-Operator, Michael McConnell, that GM intended to terminate the Dealer
6 Agreements based on breach of Article 14.5.3 of the Standard Provisions. These notices
7 were sent by registered mail to the dealership’s address of record, 1646 Highway 99E,
8 Gridley, CA 95948. Subsequently, the McConnell dealership, through counsel Jeff
9 Carter, filed protests with the California New Motor Vehicle Board (“Board”) pursuant to
10 section 3060 of the California Vehicle Code. Prior to the hearing and determination of the
11 protest proceedings, I received a request from Mr. Kent Steffes for approval of a proposed
12 change in McConnell’s ownership and management. In response to this request I initiated
13 a Change Request on GM’s DCICR system and provided on-line access to the DCICR
14 system to Mr. Steffes to enable him to submit this request electronically.

15 4. On November 12, 2013, before GM acted on the request, the Board issued
16 its Decision overruling McConnell’s protests and permitting GM to terminate the Dealer
17 Agreements, effective “forthwith.” In accordance with the Board’s Decision, GM
18 terminated the Dealer Agreements on November 14, 2013 and the pending Change
19 Request was deactivated.

20 5. On December 10, 2013, I advised Mr. Steffes of the Board’s Decision by e-
21 mail and further advised him that GM had deactivated the pending Change Request. Mr.
22 Steffes replied to my e-mail later that same day, indicating his awareness of the Board’s
23 Decision at that time. The true and correct copy of the text of our e-mail exchange on
24 December 10, 2013 is attached hereto as Exhibit A.

25 I declare under penalty of perjury under the laws of the State of California that the
26 foregoing is true and correct and that this declaration is executed this 13th day of March,
27 2014 at Detroit, Michigan.

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Milan Golusin

EXHIBIT A

From: Kent Steffes [mailto:kent@kentsteffes.com]
Sent: Tuesday, December 10, 2013 3:05 PM
To: Milan Golusin
Subject: RE: DCICR Access Request (3).docx

Milan,
Could you call me at 310 991-5368 to discuss. Rather than get into the whole New Motor Vehicle Board decision, I thought the change request was to apply a New Candidate at the new location. The candidate has all the qualifications to apply for a dealership in Gridley and will lease the property that has already been approved by GM. Please let us know what we need to do to apply.

Regards,

Kent

From: Milan Golusin [mailto:milan.golusin@gm.com]
Sent: Tuesday, December 10, 2013 11:37 AM
To: Kent Steffes
Subject: RE: DCICR Access Request (3).docx

Hi Kent,

Pursuant to the November 12, 2013, Decision of the California New Motor Vehicle Board, General Motors' Dealer Sales and Service Agreements with McConnell Chevrolet Buick, Inc. have been terminated. Thus, Change Request #58256 is moot and has been deactivated by GM.

Thank you,

Milan Golusin
Team Lead - West Region
ChannelVantage
General Motors
100 Renaissance Center, Mail Code 482-A16-C66
Detroit, MI 48265-1000
Phone: 313.667.5482
Fax: 313.483.0546

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

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PROOF OF SERVICE

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 21515 Hawthorne Blvd., Suite 950, Torrance, California 90503.

- ✓ **VIA FEDERAL EXPRESS OVERNIGHT DELIVERY** on March 14, 2014, I served the foregoing document described as **DECLARATION OF MILAN GOLUSIN** on the parties in this action by, by placing a true copy thereof enclosed in an envelope or package designated by the express service carrier for overnight delivery with delivery fees provided for, and deposited in a box or other facility regularly maintained by the express service carrier on March 14, 2014, which envelope or package was addressed as follows:

Kent Steffes
366 N. Skyewiay Road
Los Angeles, California 90049
kent@kentsteffes.com

Executed on March 14, 2014 at Torrance, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Gwendolyn Oxford