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11
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 GREGORY R.
OXFORD**

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

22 I, Gregory R. Oxford, declare and state:

23 1. I am a member in good standing of the State Bar of California and am one
24 of the attorneys representing Respondent General Motors LLC ("GM") in these
25 proceedings. I have personal knowledge of the matters set forth herein and could and
26 would competently testify thereto.

27 2. I previously represented GM in two protests filed on behalf of McConnell
28 Chevrolet Buick, Inc. (the "McConnell dealership"), Nos. PR 2369-13 and PR 2370-13,

1 by and through its counsel Jeff Carter. On October 7, 2013, before the October 22, 2013
2 hearing on the protests before Administrative Law Judge Diana Woodward Hagle, I
3 received a telephone call from Donald F. Woods of McKool Smith Hennigan LLC in Los
4 Angeles who advised me that he represented Kent Steffes. He subsequently sent me an e-
5 mail confirming what he told me orally during our call, a true and correct copy of which is
6 attached hereto as Exhibit A. As recited in Mr. Woods' e-mail, I explained to him GM's
7 position regarding the prior McConnell protests, including without limitation the then
8 current status of the protest proceedings and the scheduled hearing before Judge Hagle.

9 3. I have spent at least 16 hours reviewing the present protests filed by Mr.
10 Steffes, drafting GM's motion to dismiss and for an award of sanctions, reviewing the
11 Opposition filed by Mr. Steffes and drafting and researching GM's reply memorandum
12 and several declarations. I anticipate spending additional time, perhaps one hour,
13 preparing for and appearing at the telephonic hearing on the motion. I charge and GM
14 pays me an hourly rate of \$ 385 for my services. In addition, my firm has paid the Board
15 a \$200 filing fee on GM's behalf. GM's total costs and attorney's fees herein incurred
16 therefore will total at least \$ 6,745.00.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct and that this declaration is executed this 14th day of March,
19 2014 at Torrance, California.

20
21 
22 Gregory R. Oxford

EXHIBIT A

From: Don Woods <DWoods@McKoolSmithHennigan.com>
Subject: Settlement and Deferred Termination Agreement and Release
Date: October 7, 2013 11:11:35 AM PDT
To: "goxford@iccolaw.com" <goxford@iccolaw.com>

We represent Kent Steffes who is the chairman of the Board of Directors of McConnell Chevrolet Buick, Inc. and with his wife represents 2 of the 4 seats on the Board of Directors.

Since you are acting for GM in connection with the NMVB proceedings in which Mr. Carter purports to be acting for the corporation designated as the Dealer Company in the above mentioned document, we wanted to establish contact with you and inform you of various legal and business interests that are currently in play.

Please be advised that neither Mr. McConnell nor Mr. Marker have authority to sell all or substantially all of the assets of the corporation that owns the dealership. Nor has any purchase agreement involving Mr. Matharu been presented to the Board of Directors or Shareholders of the corporation for review or approval. Moreover, all of the assets of the corporation are equitably owned by our client Kent Steffes pursuant to his security interest in them.

Mr. Steffes has obtained a lease for premises to operate a dealership down the road from the former premises of McConnell Chevrolet Buick. He has developed a relationship with Terry Libbon who has many years of experience operating South Lake Tahoe Chevrolet and elsewhere. They are in the process of awaiting access to GM Global Connect to make a presentation to obtain a dealership for the Gridley area.

Thank you for taking my phone call this morning in which I explained the above and you were kind enough to explain GM's position in connection with the NMVB proceedings and GM's relationship with Mr. McConnell.

Please feel free to contact me at any time if you have any questions or wish to understand any aspect of the current ownership of McConnell Chevrolet Buick Inc.

Donald F. Woods, Jr.
McKool Smith Hennigan LLC
865 South Figueroa Street
Suite 2900
Los Angeles, California 90017
(213) 694-1167 desk
(213) 694-1200 reception

NOTICE OF CONFIDENTIALITY:

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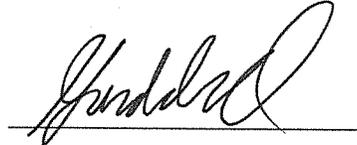
PROOF OF SERVICE

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 GREGORY R. OXFORD** 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