

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LIQUIDITY SOLUTIONS, INC.,

Plaintiff,

vs.

PROCORP IMAGES, INC.,

Defendant.

Docket No.: 13-CV-06447-WJM-MF

Civil Action

**DECLARATION OF MICHAEL
KORIK IN OPPOSITION TO
DEFENDANT'S MOTION TO
DISMISS**

MICHAEL KORIK declares as follows:

1. I am an attorney-at-law of the State of New Jersey, and an associate with the Law Offices of Charles A. Gruen, attorneys for Plaintiff, LIQUIDITY SOLUTIONS, INC. ("LSI"), in the above-captioned matter. I am fully familiar with the underlying facts and circumstances of this case. I make this Declaration in opposition to Defendant, PROCORP IMAGES, INC.'s ("PROCORP") Motion to Dismiss.

2. Attached hereto as Exhibit "A" is a true copy of the Motion of the Trustee of the IBC Creditors Trust Seeking An Order To Disallow Certain Nonresponding Creditor Beneficiaries From Future Distribution of Trust Recoveries for Failure To Comply With Tax Related Obligations filed in the matter captioned "In Re: INTERSTATE BAKERIES CORPORATION, et al.,

Debtors” under Docket No. 04-45814 in the United States Bankruptcy Court for the Western District of Missouri, Kansas City Division.

3. On January 8, 2014, I performed an Internet search on Google using the Google Maps feature located at <https://www.google.com/maps> for the address of the Defendant, PROCORP.

4. I entered the street address of 359 Inverness Dr. S, Englewood, Colorado, 80112 and was presented with a map and a “Street View” image option which allowed me to see a photographic depiction of a street level view of the subject address.

5. While viewing the “street view,” I noticed a sign directing visitors to 359 Inverness Dr. S., Englewood, Colorado, 80112 to PROCORP IMAGES, INC., with an arrow visible from the street. A printout of the subject street view, as it appeared in the publicly available Google Search engine on January 8, 2014, is annexed hereto as Exhibit “B.”

6. In conducting some further research as to the address, I learned that the building is part of a complex known as “Inverness Business Center South.” See Exhibit “C”, at page 2.

7. Annexed hereto is a listing from Docket No. 04-45814 in the United States Bankruptcy Court for the Western District of Missouri, Kansas City Division for “Attorneys” showing that Thomas M. Franklin was the attorney of

record for PROCORP IMAGES, INC., and that he was registered with ECF to receive copies of all electronically filed notices/pleadings and correspondence.

See Exhibit "D."

I hereby declare that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

A handwritten signature in black ink, appearing to read 'MK' followed by a stylized flourish.

MICHAEL KORIK (MK0377)

Dated: January 20, 2014