

LAW OFFICES
OF
CHITRA RAMANATHAN

39510 PASEO PADRE PARKWAY
SUITE 190
FREMONT, CA 94538

TELEPHONE (510)460-1494

FACSIMILE (510)796-1624

September 19, 2019

Jagdeep Hansra
Hansra Cardenas LLP
19925 Stevens Creek Blvd. Suite 100
Cupertino, CA 95014-2358

Sent via email: jh@ej-law.com

Re: Preliminary Injunction and Order issued in *Chahal et al. v. Sikh Gurdwara-San Jose, California et al.*, Santa Clara Superior Court Case number 19CV353904;

Dear Mr. Hansra,

Attached please find a Notice of Payment of Undertaking and the file endorsed copy of the bond which was filed today with the Court.

We require compliance with the Court's Order which is in effect and expect that a notice the election is not taking place on September 22, 2019 be emailed to the Gurdwara membership tonight.

Sincerely,



CHITRA RAMANATHAN
Attorney at Law

1 LAW OFFICE OF CHITRA RAMANATHAN
2 Chitra Ramanathan, Esq. (SBN296291)
3 39510 Paseo Padre Parkway
4 Suite 190
5 Fremont, CA 94538
6 Phone No: 510-460-1494
7 Fax No.: 510-796-1624
8 Email: cramanathan1@gmail.com

6 Attorney for Plaintiffs
7 Harpal Singh Chahal and
8 Manpreet Badesha

9 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA**
10 **DOWNTOWN SUPERIOR COURT**

12 HARPAL SINGH CHAHAL and
13 MANPREET BADESHA
14 Plaintiffs,

14 vs.

15 SIKH GURDWARA-SAN
16 JOSE(CALIFORNIA) a California Non-Profit
17 Religious Corporation, BHUPINDER
18 DHILLON, and DOES 1-50

18 Defendants.

DOCKET NO. 19 CV 353904

**NOTICE OF PAYMENT OF
UNDERTAKING**

Dept: 12
Time: 1:30 p.m.
Date: September 22, 2019

20 On September 19, 2019, Plaintiffs filed with the Clerk of Court at the above-mentioned
21 Court the undertaking pursuant to the Code of Civil Procedure §529 in the amount of \$60,000.00
22 per the Court's Order filed on September 18, 2019. A file endorsed copy is attached.

23
24 

25 Chitra Ramanathan
26 Attorney for Plaintiffs

PROOF OF SERVICE BY ELECTRONIC MAIL

I declare that:

I am employed in the County of Alameda, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 39510 Paseo Padre Parkway, Suite 190, Fremont, California 94538.

On September 19, 2019 I served the foregoing document described as Notice of Payment of Undertaking on defendants’ attorney, Jagdeep Hansra, Esq., in this action by sending by electronic mail a true copy thereof as follows:

Jagdeep Hansra, Esq. E-mail address: jh@ej-law.com

The electronic service address from which I served the above-described documents is: cramanathan1@gmail.com.

The time of service: p.m.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 19, 2019 at Fremont, California.

CHITRA RAMANATHAN

(ENDORSED)
FILED
SEP 19 2019

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA
Clerk of the Court
Superior Court of CA County of Santa Clara
BY [Signature] DEPUTY

**HARPAL SINGH CHAHAL and
MANPREET BADESHA,**

Plaintiff(s),

v.

**SIKH GURDWARA-SAN JOSE (CALIFORNIA)
a California Non-Profit Religious Corporation,
BHUPINDER DHILLON, and DOES 1-50,**

Defendant(s).

)
) **Case No. 19 CV 353904**
)
)

) **UNDERTAKING OF CORPORATE SURETY**
)

) **Bond No. 2280541**
)
)
)
)

WHEREAS, HARPAL SINGH CHAHAL and MANPREET BADESHA, as Principals, desire to give an undertaking for a PRELIMINARY INJUNCTION as provided by Code of Civil Procedure Section 529.

Now, Therefore, NORTH AMERICAN SPECIALTY INSURANCE COMPANY, a corporation authorized to transact the business of Surety in the State of California, does hereby obligate itself, its successors and assigns to the defendants as shown above under said statutory obligations in the sum of SIXTY THOUSAND DOLLARS AND 00/100 (\$60,000.00).

IN WITNESS THEREOF, The official signature of the Surety is hereto affixed and I hereby declare under penalty of perjury that I am its authorized Attorney-in-Fact acting under an unrevoked power of attorney which is properly executed and attached to this official document.

Signed, sealed and dated this 19th day of September, 2019.

NORTH AMERICAN SPECIALTY INSURANCE COMPANY
1450 American Lane, Suite 1100, Schaumburg, IL 60173

[Signature]
By: **Nicholas A. Hanley, Attorney-in-fact**
CA License No. OG73394

SWISS RE CORPORATE SOLUTIONS

NORTH AMERICAN SPECIALTY INSURANCE COMPANY
WASHINGTON INTERNATIONAL INSURANCE COMPANY

GENERAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, THAT North American Specialty Insurance Company, a corporation duly organized and existing under laws of the State of New Hampshire, and having its principal office in the City of Overland Park, Kansas, and Washington International Insurance Company, a corporation organized and existing under the laws of the State of New Hampshire and having its principal office in the City of Overland Park, Kansas, each does hereby make, constitute and appoint:

WILLIAM R. HANLEY, NICHOLAS A. HANLEY and APRIL M. REAGAN

and

JOINTLY OR SEVERALLY

Its true and lawful Attorney(s)-in-Fact, to make, execute, seal and deliver, for and on its behalf and as its act and deed, bonds or other writings obligatory in the nature of a bond on behalf of each of said Companies, as surety, on contracts of suretyship as are or may be required or permitted by law, regulation, contract or otherwise, provided that no bond or undertaking or contract or suretyship executed under this authority shall exceed the amount of:

FIFTEEN MILLION (\$15,000,000.00) DOLLARS

This Power of Attorney is granted and is signed by facsimile under and by the authority of the following Resolutions adopted by the Boards of Directors of both North American Specialty Insurance Company and Washington International Insurance Company at meetings duly called and held on the 9th of May, 2012:

RESOLVED, that any two of the Presidents, any Managing Director, any Senior Vice President, any Vice President, any Assistant Vice President, the Secretary or any Assistant Secretary be, and each or any of them hereby is authorized to execute a Power of Attorney qualifying the attorney named in the given Power of Attorney to execute on behalf of the Company bonds, undertakings and all contracts of surety, and that each or any of them hereby is authorized to attest to the execution of any such Power of Attorney and to attach therein the seal of the Company; and it is

FURTHER RESOLVED, that the signature of such officers and the seal of the Company may be affixed to any such Power of Attorney or to any certificate relating thereto by facsimile, and any such Power of Attorney or certificate bearing such facsimile signatures or facsimile seal shall be binding upon the Company when so affixed and in the future with regard to any bond, undertaking or contract of surety to which it is attached.



By [Signature] Steven F. Anderson, Senior Vice President of Washington International Insurance Company & Senior Vice President of North American Specialty Insurance Company



By [Signature] Michael A. Ito, Senior Vice President of Washington International Insurance Company & Senior Vice President of North American Specialty Insurance Company

IN WITNESS WHEREOF, North American Specialty Insurance Company and Washington International Insurance Company have caused their official seals to be hereunto affixed, and these presents to be signed by their authorized officers this 20 day of December, 2017.

North American Specialty Insurance Company
Washington International Insurance Company

State of Illinois
County of Cook ss:

On this 20 day of December, 2017, before me, a Notary Public personally appeared Steven P. Anderson, Senior Vice President of Washington International Insurance Company and Senior Vice President of North American Specialty Insurance Company and Michael A. Ito, Senior Vice President of Washington International Insurance Company and Senior Vice President of North American Specialty Insurance Company, personally known to me, who being by me duly sworn, acknowledged that they signed the above Power of Attorney as officers of and acknowledged said instrument to be the voluntary act and deed of their respective companies.



M. Kenny, Notary Public

I, Jeffrey Goldberg, the duly elected Assistant Secretary of North American Specialty Insurance Company and Washington International Insurance Company, do hereby certify that the above and foregoing is a true and correct copy of a Power of Attorney given by said North American Specialty Insurance Company and Washington International Insurance Company, which is still in full force and effect.

IN WITNESS WHEREOF, I have set my hand and affixed the seals of the Companies this 19 day of September, 2019.

Jeffrey Goldberg, Vice President & Assistant Secretary of Washington International Insurance Company & North American Specialty Insurance Company