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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 SERVICE EMPLOYEES INTERNATIONAL)
15 UNION, *et al.*,)

16 Plaintiffs,)

17 vs.)

18 SAL ROSSELLI, *et al.*,)

19 Defendants.)
20

Case No. 09-CV-0404 WHA

**SUPERSEDEAS BOND POSTED BY
DEFENDANT GLENN GOLDSTEIN**

Hon. William H. Alsup

21 A judgment was entered in the above-captioned case in the United States District Court
22 for the Northern District of California on April 12, 2010, against appellant Glenn R. Goldstein in
23 favor of appellee Service Employees International Union-United Healthcare Workers-West
24 (UHW) in the amount of \$73,850. UHW has levied \$875.23 in partial satisfaction of the
25 judgment, leaving \$72,974.77 as the amount outstanding on the judgment.
26

27 Glenn R. Goldstein has filed a timely notice of appeal of the judgment to the United
28 States Court of Appeals for the Ninth Circuit and desires to suspend enforcement of the
judgment pending determination of the appeal.

1 Glenn R. Goldstein undertakes and promises to pay to UHW all damages, costs, and
2 interest that may be awarded to it following the appeal of this matter up to the sum of \$91,218.46
3 if

- 4 a. the judgment so appealed is affirmed;
- 5 b. the appeal is dismissed; or.
- 6 c. Glenn R. Goldstein fails to promptly pay to UHW all sums awarded against him, in or
7 following the appeal in this action, including any costs that the court of appeal may
8 award if the judgment is modified.

9
10 If Glenn R. Goldstein fulfills the obligations on appeal set forth above, then this
11 obligation will become void. Otherwise this obligation will remain in full force and effect.

12 Glenn R. Goldstein hereby satisfies the requirement of Local Rule 65.1-1 of the United
13 States District Court for the Northern District of California, and the Court's orders by:

- 14 (1) Depositing 50 percent (\$45,609.23) of the required bond in cash with the
15 Clerk of the Court; and
- 16 (2) Pledging real property in California not exempt from execution, the value of
17 which is more than sufficient to satisfy the remaining 50 percent of the bond.

18 Glenn R. Goldstein declares as follows:

- 19 (1) The address of the property that I own that I am pledging as security for this
20 bond to secure payment of the judgment is 909 Creston Road, Berkeley, California
21 94708.
- 22 (2) I am the owner of said property and have the authority to pledge said property
23 as security.
- 24 (3) The fair market value of the property is \$800,000.
- 25 (4) The outstanding balance of all loans secured by the property is \$254,042.31.
- 26 (5) The names and addresses of all lenders of all loans secured by said property is:
27 Chase, PO BOX 78420, Phoenix, AZ 85062-8420.
- 28 (6) All liens, charges, and other encumbrances on the property are: none.

1 (7) I hereby promise not to alienate, encumber or impair the value of the property
2 until the bond is discharged without leave of Court.

3 (8) I hereby waive any homestead exemption pertaining to the property.

4 (9) I hereby promise to record this bond and the judgment against me with the
5 Alameda County Recorder promptly upon its approval by the Court.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed on
7 October 18, 2010, at Oakland, California.

8 

9 Glenn R. Goldstein

10 Execution of judgment is hereby stayed as to defendant Glenn Goldstein pending appeal.

11 Dated: November 18, 2010

