

2018 DEC 10 AM 10:44
FILED
CIRCUIT COURT
FOR MULTNOMAH

Verified Correct Copy of Original 12/11/2018.

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5 IN THE CIRCUIT COURT OF THE STATE OF OREGON
6 FOR THE COUNTY OF MULTNOMAH

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8 **OREGON STATE BAR**, a public
corporation of the State of Oregon,

Case No. 18CV31833

GENERAL JUDGMENT BY DEFAULT

9
10 **Plaintiff,**

11 **v.**

12 **KHULLAR P.A., DIVYA KHULLAR,**
13 **EMMANUEL ROSARIO GONZALES,**
14 **ALEXANDER PEÑA and ERICK SOTO,**

15 **Defendants.**

16 Based on the motion of plaintiff Oregon State Bar and the records and files herein, which
17 reveal that an order of default was entered on November 19, 2018, and the court being fully
18 advised in the premises; and now therefore,

19
20 **IT IS HEREBY ADJUDGED** that plaintiff Oregon State Bar have judgment against
21 defendants Khullar P.A., Divya Khullar, Emmanuel Rosario Gonzales and Alexander Peña in
22 the principal amount of \$152,884.00, plus post judgment interest at the rate of 9% per annum
23 commencing on the date this judgment is entered until paid, as restitution to be paid to those
24 victims who have been identified by Plaintiff as of the date of this judgment, and for plaintiff's
25 attorney fees, costs and disbursements incurred herein, pursuant to ORCP 68.

26 Page 1 – GENERAL JUDGMENT BY DEFAULT

DIANE S. SYKES, ATTORNEY AT LAW, P.C.
5911 S.E. 43rd Avenue
Portland, Oregon 97206
Ph: 503-504-7176
Fax: 503-432-3081
E-mail: diane@dianesykeslaw.com

1 **IT IS FURTHER HEREBY ADJUDGED** that plaintiff have a judgment for injunctive
2 relief against defendants Khullar P.A., Divya Khullar, Emmanuel Rosario Gonzales and Alex
3 Peña as follows:

4 A. prohibiting defendants from having personal contact with, meeting with or
5 obtaining information from individuals for the purpose of consultation, explanation,
6 recommendation or advice regarding legal matters unless licensed to practice law in the state of
7 Oregon or supervised by an attorney licensed to practice law in Oregon;

8 B. prohibiting defendants from advertising immigration services in the state of
9 Oregon;

10 C. prohibiting defendants from soliciting clients for the provision of immigration
11 services in the state of Oregon;

12 D. disallowing defendants from holding seminars or informational sessions about the
13 provision of immigration services in the state of Oregon;

14 E. prohibiting the provision of legal advice pertaining to immigration matters, or
15 selecting or filling out immigration forms for people in the state of Oregon, unless a licensed
16 attorney in the state of Oregon or an authorized immigration consultant;

17 F. prohibiting defendants from advising people in Oregon about the procedural
18 functions of the courts and administrative bodies as it relates to a person's immigration matter,
19 including advice regarding jurisdiction and venue;

20 G. prohibiting defendants from signing retainer agreements with or receiving funds
21 from consumers in the state of Oregon unless licensed to practice law in Oregon, are
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1 supervised by an attorney licensed to practice in Oregon or are an authorized immigration
2 consultant with USCIS or DOJ; and

3 H. ordering defendants to promptly close and refund all money paid to Oregon
4 consumers, not yet known, upon written request by the consumer within ten (10) days of the
5 request.
6

7 **MONEY AWARD**

9 Judgment Creditor:

Oregon State Bar
16037 SW Upper Boones Ferry Rd
Tigard, OR 97224
(503) 620-0222

12 Judgment Creditor's Lawyers:

Diane S. Sykes
Attorney at Law, P.C.
5911 SE 43rd Avenue
Portland, OR 97206
(503) 504-7176

Keith Dubanevich
Josh Ross
Stoll Berne, PC
209 SW Oak St., Ste 500
Portland OR 97204
(503) 227-1600

20 Person Other than Judgment Creditor Entitled
21 to any Portion of Judgment:

N/A

22 Judgment Debtors:

Khullar P.A.
4786 W Commercial Blvd.
Tamarac, FL 33319
(954) 642-2308

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Divya Khullar
4786 W Commercial Blvd.
Tamarac, FL 33319
(954) 642-2308

Emmanuel Rosario Gonzales
c/o Florida Help Group
18014 SW 154th Ave
Miami, FL 33187-7741
(305) 542-5513

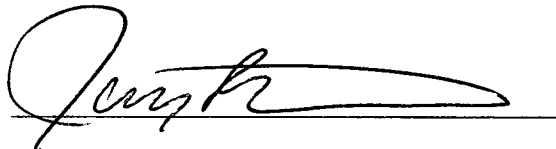
Alex Peña
c/o Khullar P.A.
4786 W Commercial Blvd.
Tamarac, FL 33319
(954) 642-2308

Judgment Debtor's Lawyer:	Pro Se
Judgment Amount:	\$152,884.00
Prejudgment Interest:	n/a
Postjudgment Interest:	Simple interest at the rate of 9% per Annum, to be compounded annually from the date of this money judgment until paid.
Prevailing Party Fee:	To be awarded pursuant to ORCP 68
Other Costs:	To be awarded pursuant to ORCP 68
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1 Attorney Fees: To be awarded pursuant to ORCP 68
2 Total Money Judgment (not including attorney fees): \$152,884.00
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6 12/7/18

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9 Submitted by:

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11 Diane S. Sykes, Attorney at Law, P.C.
12 OSB No. 980990
13 5911 SE 43rd Avenue
14 Portland, Oregon 97206
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16 Fax: (503) 432-8031
17 Keith S. Dubanevich, OSB No. 975200
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20 Fax: 503- 227-6840
21 Of Attorneys for Plaintiff
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UTCR 5.100 CERTIFICATE OF COMPLIANCE

This proposed order or judgment is ready for judicial signature because:

- 1. Service is not required under UTCR 5.100 (1)(c) because the other party has been found in default and an order of default has been entered.
- 2. Each party affected by this order or judgment has stipulated to the order or judgment, as shown by each party's signature on the document being submitted.
- 3. Each party affected by this order or judgment has approved the order or judgment, as shown by each party's signature on the document being submitted or by written confirmation of approval sent to me.
- 4. I have served a copy of this order or judgment on each party entitled to service and:
 - a. No objection has been served on me.
 - b. I received objections that I could not resolve with a party despite reasonable efforts to do so. I have filed a copy of the objections I received and indicated which objections remain unresolved.
 - c. After conferring about objections, [role and name of objecting party] agreed to independently file any remaining objection.
- 4. Service is not required pursuant to subsection (3) of this rule, or by statute, rule, or otherwise.
- 5. This is a proposed judgment that includes an award of punitive damages and notice has been served on the Director of the Crime Victims' Assistance Section as required by subsection (5) of this rule.
- 6. Other: _____

DIANE S. SYKES, ATTORNEY AT LAW, P.C.

/s/ Diane S. Sykes
Diane S. Sykes, OSB No. 980990
Of Attorneys for Plaintiff Oregon State Bar

Verified Correct Copy of Original 12/11/2018.

CERTIFICATE OF SERVICE

I hereby certify that counsel for plaintiffs served the foregoing **PLAINTIFF'S ATTORNEY DECLARATION IN SUPPORT OF MOTION FOR JUDGMENT BY DEFAULT, PLAINTIFF OREGON STATE BAR'S MOTION FOR JUDGMENT BY DEFAULT AGAINST KHULLAR P.A., DIVYA KHULLAR, EMMANUEL ROSARIO GONZALES and ALEXANDER PEÑA ONLY, and DEFAULT GENERAL JUDGMENT** on the following:

Khullar P.A.
4786 W. Commercial Blvd
Tamarac, FL 33319
Dkhullar@Khullarlaw.com

Mr. Divya Khullar
c/o Khullar PA
4786 W. Commercial Blvd.
Tamarac, FL 33319
Dkhullar@Khullarlaw.com

Emmanuel Rosario
c/o Florida Help Group Inc.
18014 SW 154th Ave
Miami, FL 33187-7741
emmanuel@flhelpgroup.com

Alexander Peña
c/o Khullar P.A.
4786 W. Commercial Blvd.
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alex_pena7@hotmail.com

Erick Soto
c/o R. Grant Cook
Lafky & Lafky, Attorneys at Law
429 Court Street, NE
Salem, Oregon 97301
gcook@lafky.com

By email to the above referenced email addresses, and by mailing in a sealed envelope with postage prepaid thereon, at the above addresses with an e-mail courtesy copy, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.

Dated this 20th day of November, 2018.

DIANE S. SYKES, ATTORNEY AT LAW, P.C.

/s/ Diane S. Sykes
Diane S. Sykes, OSB No. 980990
Of Attorneys for Plaintiff Oregon State Bar