

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Other/Civil

In re:

Assignment for the Benefit of Creditors of
Young America, LLC

Court File No. 27-CV-20-11191
Hon. Joseph R. Klein

AFFIDAVIT OF STEVEN L. VICTOR

Steven L. Victor, declares as follows:

1. I am an authorized representative of YA ABC, LLC (the “Assignee”) in this matter.
2. I make this affidavit in support of the Assignee’s motion regarding procedural issues (the “Motion”).
3. The Assignee, pursuant to the terms of the assignment, received Young America, LLC’s (the “Assignor”) leasehold interest in certain property as described more fully in paragraph 1.4 of that certain Lumber Exchange Building Office Lease entered into by Lumber, LLC (the “Landlord”) and the Assignor, dated December 31, 2014 (the “Leased Property”), attached to the Motion as **Exhibit 2**.
4. The Assignee, pursuant to the terms of the assignment, is also in receipt of certain physical property located at the Leased Property, including fixtures, goods, inventory, equipment, furniture, and furnishings (the “Office Property”).
5. I have conferred with the Landlord and the Assignee’s legal counsel, Stinson LLP, whose representative personally inspected the Leased Property and the Office Property, and have determined that both the Leased Property and Office Property are of immaterial value.

6. I am in discussions with the Landlord to relinquish the Assignee's interest in the Leased Property and the Office property in exchange for the Landlord's agreement to reduce the amount of any claim it may have in this matter.

RESPECTFULLY SUBMITTED this 23rd DAY OF SEPTEMBER, 2020

Dated: September 23, 2020

YA ABC, LLC

/s/ Steven L. Victor
Steven L. Victor