

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RNS SERVICING, LLC, and Illinois Limited
Liability Company,

Plaintiff,

v.

SPIRIT CONSTRUCTION SERVICES, INC.,
a Delaware Corporation, STEVEN VAN DEN
HEUVEL, a citizen of the State of Wisconsin,
and SHARAD TAK, a Citizen of the State of
Florida,

Defendants.

Case No. 17-cv-108

Judge Edmond E. Chang

DECLARATION OF BRIAN C. LANGS

I, Brian C. Langs, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an adult resident of the State of Illinois, licensed to practice law by and in good standing with the State Bar of Illinois.
2. I am one of the attorneys for Plaintiff RNS Servicing, Inc. in the above-captioned case.
3. Attached hereto as Exhibit W is a true and correct copy of the April 10, 2008 deposition transcript of Ronald Van Den Heuvel (“Ron VDH”) taken in the Second IFC Lawsuit referenced in the First Amended Complaint.
4. Attached hereto as Exhibit X is a true and correct copy of the April 8, 2008 deposition transcript of Steven Van Den Heuvel (“Steve VDH”) taken the Second IFC Lawsuit referenced in the First Amended Complaint.

5. Attached hereto as Exhibit Y is a true and correct copy of a List of VHC, Inc. Common Stock Holders which was produced by Defendants Steve VDH and Spirit Construction Services, Inc. (“Spirit”) in this matter.

6. Attached hereto as Exhibit X is a true and correct copy of the December 18, 2018 deposition transcript of Steve VDH taken in this matter.

7. Attached hereto as Exhibit AA is a true and correct copy of the November 14, 2006 Oconto Falls/DePere Upgrades EPC Contract, which is one of the EPC Contracts referenced in the Continuing Pledge Agreement (“CPA EPC Contracts”) and the First Amended Complaint (“FAC”).

8. Attached hereto as Exhibit BB is a true and correct copy of the November 14, 2006 DePere EPC Contract, which is one of the CPA EPC Contracts referenced in the Continuing Pledge Agreement and FAC.

9. Attached hereto as Exhibit CC is a true and correct copy of the November 14, 2006 St. George, Utah EPC Contract, which is one of the CPA EPC Contracts referenced in the Continuing Pledge Agreement and FAC.

10. Attached hereto as Exhibit DD is a true and correct copy of the November 14, 2006 Pennsylvania Site EPC Contract, which is one of the CPA EPC Contracts referenced in the Continuing Pledge Agreement and FAC.

11. Attached hereto as Exhibit EE is a true and correct copy of the Defendants’ Answer to IFC Credit Corporation’s Complaint in the Second IFC Lawsuit referenced in the First Amended Complaint.

12. Attached hereto as Exhibit FF is a true and correct copy of the December 18, 2018 deposition transcript of Marc Langs taken in this matter.

13. Attached hereto as Exhibit GG is a true and correct copy of the June 25, 2009 resignation of Marc Langs from IFC.

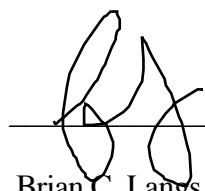
14. Attached hereto as Exhibit HH is a true and correct copy of the September, 21 2017 deposition transcript of Sharad Tak (“Tak”) taken in this matter.

15. Attached as Exhibit II is a true and correct copy of the September 19, 2017 Declaration of Tak, which includes as exhibits the four CPA EPC Contracts referenced in the Continuing Pledge Agreement and FAC.

16. Attached as Exhibit JJ is a true and correct copy of the March 28, 2016 Amended Trustee’s Final Report filed by the IFC Bankruptcy Trustee in Case No. 09-27094 in the U.S. Bankruptcy Court in the Northern District of Illinois.

17. I offer this declaration in opposition to Defendants’ Joint Motion for Summary Judgment in this matter.

Dated: May 5, 2019



Brian C. Langs