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FILE #	5081-01
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ATTORNEY:	
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8 **DISTRICT COURT OF NEVADA**
 9 **COUNTY OF CLARK**

10 TED R. BURKE; MICHAEL R and LAURETTA)
 11 L. KEHOE; JOHN BERTOLDO; PAUL)
 12 BERNARD; EDDY KRAVETZ; JACKIE)
 and FRED KRAVETZ; STEVE FRANKS;)
 13 PAULA MARIA BARNARD; PETE T. and)
 LISA A. FREEMANLEON GOLDEN;)
 14 C.A. MURFF; GERDA FERN BILLBE; BOB and)
 ROBYN TRESKA; MICHAEL RANDOLPH, and)
 15 FREDERICK WILLIS,)

CASE NO. A558629
 DEPT. XIII

16 Plaintiffs,

17 vs.

**ANSWER TO AMENDED
 VERIFIED DERIVATIVE
 COMPLAINT**

18 LARRY L. HAHN, individually, and as President)
 of and Treasurer of Kokoweef, Inc., and former)
 19 President and Treasurer of Explorations)
 Incorporated of Nevada; HAHN'S WORLD OF)
 20 SURPLUS, INC., a Nevada corporation;)
 PATRICK C. CLARY, an individual;)
 21 DOES 1 through 100, inclusive;)

22 Defendants,

23 and

24 KOKOWEEF, INC., a Nevada corporation;)
 25 EXPLORATIONS INCORPORATED OF)
 NEVADA, a dissolved Nevada corporation;)

26 Nominal Defendants.

27
 28 Defendants LARRY HAHN ("HAHN") and HAHN'S WORLD OF SURPLUS, INC

1 ("SURPLUS")(HAHN and SURPLUS sometimes collectively referred to herein as "ANSWERING
2 DEFENDANTS") hereby responds to Plaintiffs' so-called Amended Verified Derivative Complaint
3 ("COMPLAINT") filed herein and admit, deny and otherwise pleads to the allegations set forth in
4 the COMPLAINT as follows:

5 1. ANSWERING DEFENDANTS deny the allegations contained in paragraph 1 of the
6 Nature of the Action and Factual Allegations section of the COMPLAINT.

7 2. In response to the allegations contained in paragraph 2 of the Nature of the Action
8 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
9 Explorations Incorporated of Nevada ("EIN") was incorporated on or about October 24, 1984, but
10 deny the remaining allegations contained in said paragraph.

11 3. In response to the allegations contained in paragraph 3 of the Nature of the Action
12 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS are without
13 sufficient knowledge or information to form a believe as to the meaning "all times relevant herein"
14 and; therefore, deny same, but admit the remaining allegations contained in said paragraph.

15 4. ANSWERING DEFENDANTS admit the allegations contained in paragraph 4 of the
16 Nature of the Action and Factual Allegations section of the COMPLAINT.

17 5. ANSWERING DEFENDANTS deny the allegations contained in paragraph 5 of the
18 Nature of the Action and Factual Allegations section of the COMPLAINT.

19 6. ANSWERING DEFENDANTS deny the allegations contained in paragraph 6 of the
20 Nature of the Action and Factual Allegations section of the COMPLAINT.

21 7. ANSWERING DEFENDANTS deny the allegations contained in paragraph 7 of the
22 Nature of the Action and Factual Allegations section of the COMPLAINT.

23 8. ANSWERING DEFENDANTS admit the allegations contained in paragraph 8 of the
24 Nature of the Action and Factual Allegations section of the COMPLAINT.

25 9. ANSWERING DEFENDANTS deny the allegations contained in paragraph 9 of the
26 Nature of the Action and Factual Allegations section of the COMPLAINT.

27 10. ANSWERING DEFENDANTS deny the allegations contained in paragraph 10 of the
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1 Nature of the Action and Factual Allegations section of the COMPLAINT.

2 11. ANSWERING DEFENDANTS deny the allegations contained in paragraph 11 of the
3 Nature of the Action and Factual Allegations section of the COMPLAINT.

4 12. ANSWERING DEFENDANTS deny the allegations contained in paragraph 12 of the
5 Nature of the Action and Factual Allegations section of the COMPLAINT.

6 13. In response to the allegations contained in paragraph 13 of the Nature of the Action
7 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit that
8 on or about September 18, 2007, BURKE was invited to attend a meeting with Defendant HAHN,
9 CLARY and others, admit that CLARY made the statements set forth in the last sentence of said
10 paragraph regarding the Securities & Exchange Commission, but deny the remaining allegations in
11 said paragraph.

12 14. ANSWERING DEFENDANTS deny the allegations contained in paragraph 14 of the
13 Nature of the Action and Factual Allegations section of the COMPLAINT.

14 15. ANSWERING DEFENDANTS deny the allegations contained in paragraph 15 of the
15 Nature of the Action and Factual Allegations section of the COMPLAINT.

16 16. In response to the allegations contained in paragraph 16 of the Nature of the Action
17 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
18 CLARY was general counsel for KOKOWEEF, INC and did not represent HAHN, that BURKE had
19 issues with which he addressed at the meeting but deny the remaining allegations of said paragraph.

20 17. ANSWERING DEFENDANTS deny the allegations contained in paragraph 17 of the
21 Nature of the Action and Factual Allegations section of the COMPLAINT.

22 18. ANSWERING DEFENDANTS deny the allegations contained in paragraph 18 of the
23 Nature of the Action and Factual Allegations section of the COMPLAINT.

24 19. In response to the allegations contained in paragraph 19 of the Nature of the Action
25 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
26 BURKE is a resident of Clark County, Nevada, but deny the remaining allegations of said paragraph.

27 20. In response to the allegations contained in paragraph 20 of the Nature of the Action
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1 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
2 Plaintiffs Michael R. Kehoe and Laretta L. Kehoe are residents of Clark County, Nevada, but deny
3 the remaining allegations of said paragraph.

4 21. In response to the allegations contained in paragraph 19 of the Nature of the Action
5 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
6 BERTOLDO is a resident of Clark County, Nevada, but deny the remaining allegations of said
7 paragraph.

8 22. In response to the allegations contained in paragraph 19 of the Nature of the Action
9 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
10 BERNARD is a resident of Clark County, Nevada, but deny the remaining allegations of said
11 paragraph.

12 23. In response to the allegations contained in paragraph 19 of the Nature of the Action
13 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
14 KRAVETZ is a resident of Clark County, Nevada, but deny the remaining allegations of said
15 paragraph.

16 24. In response to the allegations contained in paragraph 19 of the Nature of the Action
17 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
18 KRAVETZ is a resident of Clark County, Nevada, but deny the remaining allegations of said
19 paragraph.

20 25. In response to the allegations contained in paragraph 19 of the Nature of the Action
21 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
22 FRANKS is a resident of Clark County, Nevada, but deny the remaining allegations of said
23 paragraph.

24 26. In response to the allegations contained in paragraph 19 of the Nature of the Action
25 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
26 BARNARD is a resident of Clark County, Nevada, but deny the remaining allegations of said
27 paragraph.

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1 27. In response to the allegations contained in paragraph 27 of the Nature of the Action
2 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS are without
3 sufficient knowledge or information to form a belief as to the truth or falsity of the allegations
4 contained therein and; therefore, deny same.

5 28. In response to the allegations contained in paragraph 19 of the Nature of the Action
6 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
7 MURFF is a resident of Clark County, Nevada, but deny the remaining allegations of said paragraph.

8 29. In response to the allegations contained in paragraph 19 of the Nature of the Action
9 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
10 BILLBE is a resident of Clark County, Nevada, but deny the remaining allegations of said
11 paragraph.

12 30. In response to the allegations contained in paragraph 19 of the Nature of the Action
13 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
14 TRESKAS is a resident of Clark County, Nevada, but deny the remaining allegations of said
15 paragraph.

16 31. In response to the allegations contained in paragraph 19 of the Nature of the Action
17 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
18 RANDOLPH is a resident of Clark County, Nevada, but deny the remaining allegations of said
19 paragraph.

20 32. In response to the allegations contained in paragraph 19 of the Nature of the Action
21 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
22 WILLIS is a resident of Clark County, Nevada, but deny the remaining allegations of said paragraph.

23 33. ANSWERING DEFENDANTS admit the allegations contained in paragraph 33 of
24 the Nature of the Action and Factual Allegations section of the COMPLAINT.

25 34. In response to the allegations contained in paragraph 34 of the Nature of the Action
26 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS deny EIN was
27 incorporated in 1984, but admit the remaining allegations contained therein.

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1 35. ANSWERING DEFENDANTS admit the allegations contained in paragraph 35 of
2 the Nature of the Action and Factual Allegations section of the COMPLAINT.

3 36. In response to the allegations contained in paragraph 36 of the Nature of the Action
4 and Factual Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
5 SURPLUS is a corporation organized and existing under the laws of the state of Nevada, that it
6 conducts business in North Las Vegas, Nevada, and that HAHN has previously been the President
7 of said corporation; but deny the remaining allegations contained in said paragraph.

8 37. ANSWERING DEFENDANTS deny the allegations contained in paragraph 37 of the
9 Nature of the Action and Factual Allegations section of the COMPLAINT.

10 38. ANSWERING DEFENDANTS deny the allegations contained in paragraph 38 of the
11 Nature of the Action and Factual Allegations section of the COMPLAINT.

12 39. ANSWERING DEFENDANTS deny the allegations contained in paragraph 39 of the
13 Derivative and Demand Excused Allegations section of the COMPLAINT.

14 40. ANSWERING DEFENDANTS deny the allegations contained in paragraph 40 of the
15 Derivative and Demand Excused Allegations section of the COMPLAINT.

16 41. ANSWERING DEFENDANTS deny the allegations contained in paragraph 41 of the
17 Derivative and Demand Excused Allegations section of the COMPLAINT.

18 42. In response to the allegations contained in paragraph 42 of the Derivative and
19 Demand Excused Allegations section of the COMPLAINT, ANSWERING DEFENDANTS admit
20 Plaintiffs did not make any demand upon the KOKOWEEF board of directors prior to commencing
21 this action, but deny the remaining allegations contained in said paragraph.

22 43. The Court has dismissed the First Cause of Action; therefore, no response is
23 necessary to paragraph 43 of the COMPLAINT.

24 44. The Court has dismissed the First Cause of Action; therefore, no response is
25 necessary to paragraph 44 of the COMPLAINT.

26 45. The Court has dismissed the First Cause of Action; therefore, no response is
27 necessary to paragraph 45 of the COMPLAINT.

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1 46. The Court has dismissed the First Cause of Action; therefore, no response is
2 necessary to paragraph 46 of the COMPLAINT.

3 47. The Court has dismissed the First Cause of Action; therefore, no response is
4 necessary to paragraph 47 of the COMPLAINT.

5 48. The Court has dismissed the Second Cause of Action; therefore, no response is
6 necessary to paragraph 48 of the COMPLAINT.

7 49. The Court has dismissed the Second Cause of Action; therefore, no response is
8 necessary to paragraph 49 of the COMPLAINT.

9 50. The Court has dismissed the Second Cause of Action; therefore, no response is
10 necessary to paragraph 50 of the COMPLAINT.

11 51. The Court has dismissed the Second Cause of Action; therefore, no response is
12 necessary to paragraph 51 of the COMPLAINT.

13 52. The Court has dismissed the Second Cause of Action; therefore, no response is
14 necessary to paragraph 52 of the COMPLAINT.

15 53. The Court has dismissed the Second Cause of Action; therefore, no response is
16 necessary to paragraph 53 of the COMPLAINT.

17 54. The Court has dismissed the Second Cause of Action; therefore, no response is
18 necessary to paragraph 54 of the COMPLAINT.

19 55. The Court has dismissed the Second Cause of Action; therefore, no response is
20 necessary to paragraph 55 of the COMPLAINT.

21 56. The Court has dismissed the Second Cause of Action; therefore, no response is
22 necessary to paragraph 56 of the COMPLAINT.

23 57. The Court has dismissed the Third Cause of Action; therefore, no response is
24 necessary to paragraph 57 of the COMPLAINT.

25 58. The Court has dismissed the Third Cause of Action; therefore, no response is
26 necessary to paragraph 58 of the COMPLAINT.

27 59. The Court has dismissed the Third Cause of Action; therefore, no response is
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1 necessary to paragraph 59 of the COMPLAINT.

2 60. The Court has dismissed the Third Cause of Action; therefore, no response is
3 necessary to paragraph 60 of the COMPLAINT.

4 61. The Court has dismissed the Third Cause of Action; therefore, no response is
5 necessary to paragraph 61 of the COMPLAINT.

6 62. The Court has dismissed the Third Cause of Action; therefore, no response is
7 necessary to paragraph 62 of the COMPLAINT.

8 63. The Court has dismissed the Third Cause of Action; therefore, no response is
9 necessary to paragraph 63 of the COMPLAINT.

10 64. The Court has dismissed the Third Cause of Action; therefore, no response is
11 necessary to paragraph 64 of the COMPLAINT.

12 65. In response to paragraph 65 of the Fourth Cause of Action section of the
13 COMPLAINT, ANSWERING DEFENDANTS repeat and reallege their responses to paragraphs 1
14 through 38 of the COMPLAINT as though fully set forth herein.

15 66. ANSWERING DEFENDANTS deny the allegations contained in paragraph 66 of the
16 Fourth Cause of Action section of the COMPLAINT.

17 67. ANSWERING DEFENDANTS deny the allegations contained in paragraph 67 of the
18 Fourth Cause of Action section of the COMPLAINT.

19 68. ANSWERING DEFENDANTS deny the allegations contained in paragraph 68 of the
20 Fourth Cause of Action section of the COMPLAINT.

21 69. ANSWERING DEFENDANTS deny the allegations contained in paragraph 69 of the
22 Fourth Cause of Action section of the COMPLAINT.

23 70. ANSWERING DEFENDANTS deny the allegations contained in paragraph 70 of the
24 Fourth Cause of Action section of the COMPLAINT.

25 71. ANSWERING DEFENDANTS deny the allegations contained in paragraph 71 of the
26 Fourth Cause of Action section of the COMPLAINT.

27 72. The Court has dismissed the Fifth Cause of Action; therefore, no response is
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1 necessary to paragraph 72 of the COMPLAINT.

2 73. The Court has dismissed the Fifth Cause of Action; therefore, no response is
3 necessary to paragraph 73 of the COMPLAINT.

4 74. The Court has dismissed the Fifth Cause of Action; therefore, no response is
5 necessary to paragraph 74 of the COMPLAINT.

6 75. The Court has dismissed the Fifth Cause of Action; therefore, no response is
7 necessary to paragraph 75 of the COMPLAINT.

8 76. The Court has dismissed the Fifth Cause of Action; therefore, no response is
9 necessary to paragraph 76 of the COMPLAINT.

10 77. The Court has dismissed the Fifth Cause of Action; therefore, no response is
11 necessary to paragraph 77 of the COMPLAINT.

12 78. The Court has dismissed the Fifth Cause of Action; therefore, no response is
13 necessary to paragraph 78 of the COMPLAINT.

14 79. The Court has dismissed the Fifth Cause of Action; therefore, no response is
15 necessary to paragraph 79 of the COMPLAINT.

16 80. The Court has dismissed the Fifth Cause of Action; therefore, no response is
17 necessary to paragraph 80 of the COMPLAINT.

18 81. The Court has dismissed the Fifth Cause of Action; therefore, no response is
19 necessary to paragraph 81 of the COMPLAINT.

20 82. The Court has dismissed the Fifth Cause of Action; therefore, no response is
21 necessary to paragraph 82 of the COMPLAINT.

22 83. The Court has dismissed the Sixth Cause of Action; therefore, no response is
23 necessary to paragraph 83 of the COMPLAINT.

24 84. The Court has dismissed the Sixth Cause of Action; therefore, no response is
25 necessary to paragraph 84 of the COMPLAINT.

26 85. The Court has dismissed the Sixth Cause of Action; therefore, no response is
27 necessary to paragraph 85 of the COMPLAINT.

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1 86. The Court has dismissed the Sixth Cause of Action; therefore, no response is
2 necessary to paragraph 86 of the COMPLAINT.

3 87. The Court has dismissed the Sixth Cause of Action; therefore, no response is
4 necessary to paragraph 87 of the COMPLAINT.

5 88. The Court has dismissed the Sixth Cause of Action; therefore, no response is
6 necessary to paragraph 88 of the COMPLAINT.

7 89. The Court has dismissed the Sixth Cause of Action; therefore, no response is
8 necessary to paragraph 89 of the COMPLAINT.

9 90. The Court has dismissed the Sixth Cause of Action; therefore, no response is
10 necessary to paragraph 90 of the COMPLAINT.

11 91. The Court has dismissed the Sixth Cause of Action; therefore, no response is
12 necessary to paragraph 91 of the COMPLAINT.

13 92. The Court has dismissed the Sixth Cause of Action; therefore, no response is
14 necessary to paragraph 92 of the COMPLAINT.

15 93. In response to paragraph 93 of the Seventh Cause of Action section of the
16 COMPLAINT, ANSWERING DEFENDANTS repeat and reallege their responses to paragraphs 1
17 through 38 of the COMPLAINT as though fully set forth herein.

18 94. In response to the allegations contained in paragraph 94 of the Seventh Cause of
19 Action, ANSWERING DEFENDANT admit that HAHN, as an officer or director of KOKOWEEF
20 and EIN, owed a corporate fiduciary duty to the shareholders of each corporation but deny the
21 remaining allegations contained in said paragraph.

22 95. ANSWERING DEFENDANTS deny the allegations contained in paragraph 95 of the
23 Seventh Cause of Action section of the COMPLAINT.

24 96. ANSWERING DEFENDANTS deny the allegations contained in paragraph 96 of the
25 Seventh Cause of Action section of the COMPLAINT.

26 97. ANSWERING DEFENDANTS deny the allegations contained in paragraph 97 of the
27 Seventh Cause of Action section of the COMPLAINT.

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1 98. In response to paragraph 98 of the Eight [sic] Cause of Action section of the
2 COMPLAINT, ANSWERING DEFENDANTS repeat and reallege their responses to paragraphs 1
3 through 38 of the COMPLAINT as though fully set forth herein.

4 99. ANSWERING DEFENDANTS deny the allegations contained in paragraph 99 of the
5 Eight [sic] Cause of Action section of the COMPLAINT.

6 100. ANSWERING DEFENDANTS deny the allegations contained in paragraph 100 of
7 the Eight [sic] Cause of Action section of the COMPLAINT.

8 101. ANSWERING DEFENDANTS deny the allegations contained in paragraph 101 of
9 the Eight [sic] Cause of Action section of the COMPLAINT.

10 102. In response to paragraph 102 of the Ninth Cause of Action section of the
11 COMPLAINT, ANSWERING DEFENDANTS repeat and reallege their responses to paragraphs 1
12 through 38 of the COMPLAINT as though fully set forth herein.

13 103. ANSWERING DEFENDANTS deny the allegations contained in paragraph 103 of
14 the Ninth Cause of Action section of the COMPLAINT.

15 104. ANSWERING DEFENDANTS deny the allegations contained in paragraph 104 of
16 the Ninth Cause of Action section of the COMPLAINT.

17 105. ANSWERING DEFENDANTS deny the allegations contained in paragraph 105 of
18 the Ninth Cause of Action section of the COMPLAINT.

19 106. ANSWERING DEFENDANTS deny the allegations contained in paragraph 106 of
20 the Ninth Cause of Action section of the COMPLAINT.

21 107. In response to paragraph 107 of the Tenth Cause of Action section of the
22 COMPLAINT, ANSWERING DEFENDANTS repeat and reallege their responses to paragraphs 1
23 through 38 of the COMPLAINT as though fully set forth herein.

24 108. ANSWERING DEFENDANTS deny the allegations contained in paragraph 108 of
25 the Tenth Cause of Action section of the COMPLAINT.

26 109. ANSWERING DEFENDANTS deny the allegations contained in paragraph 109 of
27 the Tenth Cause of Action section of the COMPLAINT.

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1 110. ANSWERING DEFENDANTS deny the allegations contained in paragraph 110 of
2 the Tenth Cause of Action section of the COMPLAINT.

3 111. ANSWERING DEFENDANTS deny the allegations contained in paragraph 111 of
4 the Tenth Cause of Action section of the COMPLAINT.

5 112. It has been necessary for ANSWERING DEFENDANTS to retain attorneys to defend
6 this matter and they are entitled to a reasonable sum as and for their attorneys' fees herein.

7 FIRST AFFIRMATIVE DEFENSE

8 The COMPLAINT fails to state a claim against ANSWERING DEFENDANTS upon which
9 relief can be granted.

10 SECOND AFFIRMATIVE DEFENSE

11 The damages, if any, sustained by PLAINTIFFS is due to their own actions and
12 ANSWERING DEFENDANTS are not liable to them.

13 THIRD AFFIRMATIVE DEFENSE

14 PLAINTIFFS have failed to name a necessary party.

15 FOURTH AFFIRMATIVE DEFENSE

16 PLAINTIFFS have unclean hands and are barred from recovery herein.

17 FIFTH AFFIRMATIVE DEFENSE

18 PLAINTIFFS failed to mitigate their damages and may not recover from ANSWERING
19 DEFENDANTS herein.

20 SIXTH AFFIRMATIVE DEFENSE

21 PLAINTIFFS' damages, if any, were caused by the actions of third parties over whom
22 ANSWERING DEFENDANTS had no control.

23 SEVENTH AFFIRMATIVE DEFENSE

24 PLAINTIFFS assumed the risk that is the basis of their claim of damages and may not
25 recover their damages, if any, from ANSWERING DEFENDANTS herein.

26 EIGHTH AFFIRMATIVE DEFENSE

27 PLAINTIFFS are estopped from asserting a claim against ANSWERING DEFENDANTS
28

1 herein.

2 NINTH AFFIRMATIVE DEFENSE

3 PLAINTIFFS have a waived any right to a claim against ANSWERING DEFENDANTS
4 that may have existed.

5 TENTH AFFIRMATIVE DEFENSE

6 The negligence of PLAINTIFFS is greater than that of ANSWERING DEFENDANTS;
7 therefore, they may not recover their damages, if any, from ANSWERING DEFENDANTS.

8 ELEVENTH AFFIRMATIVE DEFENSE

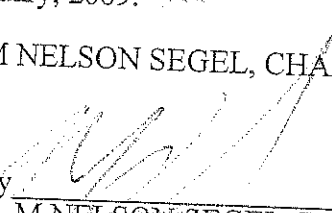
9 PLAINTIFFS claims may be barred by additional affirmative defenses as set forth in
10 NRCP 8(c). However, because discovery has not yet been completed, the applicability of those
11 defenses is, as yet, unknown. Therefore, under NRCP 11, ANSWERING DEFENDANTS
12 reserve the right to supplement this list of affirmative defenses at a later date.

13 WHEREFORE, ANSWERING DEFENDANTS pray for relief as follows:

- 14 1. That the COMPLAINT be dismissed;
- 15 2. That they be awarded the costs of suit;
- 16 3. That they be awarded a reasonable attorneys' fee for having to defend this action;
- 17 4. That the funds being held by the Court as security be disbursed to ANSWERING
18 DEFENDANTS as reimbursement of a portion of their attorneys' fees herein; and
- 19 5. For such other and further relief that the Court deems just and proper in the
20 premises.

21 DATED this 20th day of February, 2009.

22 M NELSON SEGEL, CHARTERED

23
24 By 
25 M NELSON SEGEL, ESQUIRE
26 Nevada Bar No. 0530
27 624 South 9th Street
28 Las Vegas, Nevada 89101
Attorneys for Defendants


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CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 20th day of February, 2009, she served the foregoing ANSWER TO AMENDED VERIFIED DERIVATIVE COMPLAINT by causing a true and correct copy to be placed in the United States Mail, postage fully prepaid thereon and addressed as follows:

Jennifer Taylor, Esquire
401 North Buffalo Drive
Suite 202
Las Vegas, Nevada 89145

Patrick C. Clary, Esquire
7201 West Lake Mead
Suite 410
Las Vegas, Nevada 89128


An employee of M Nelson Segel, Chartered