

Exhibit 2:

Defendants Larry L. Hahn
and Hahn's World of
Surplus, Inc's Motion to
Quash Subpoenas

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ATTORNEY:	JJ
ROUTE TO:	

1 0334
 2 M NELSON SEGEL, CHARTERED
 3 M NELSON SEGEL, ESQUIRE
 Nevada Bar No. 0530
 4 624 South 9th Street
 Las Vegas, Nevada 89101
 Telephone: (702) 385-5266
 Attorneys for Defendants Larry Hahn
 and Hahn's World of Surplus, Inc.

DISTRICT COURT OF NEVADA
 COUNTY OF CLARK

-o0o-

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. FREEMAN; LEON GOLDEN;
 14 C.A. MURFF; GERDA FERN BILLBE; BOB and)
 ROBYN TRESKA; MICHAEL RANDOLPH, and)
 FREDERICK WILLIS,

Plaintiffs,

vs.

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

Defendants,

and

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

Nominal Defendants.

CASE NO. A558629
 DEPT. XIII

DEFENDANTS LARRY L. HAHN
 AND HAHN'S WORLD OF
 SURPLUS, INC.'S MOTION
 TO QUASH SUBPOENAS

DATE: 5/29/09
 TIME: 9:50 AM

27 Defendants LARRY HAHN ("HAHN") and HAHN'S WORLD OF SURPLUS, INC.
 28 ("SURPLUS")(HAHN and SURPLUS sometimes collectively referred to herein as "HAHN

1 DEFENDANTS”), by and through their attorney, M NELSON SEGEL, ESQUIRE, hereby move this
2 Court to Quash the five (5) subpoenas duces tecum attached hereto as Exhibit “B” and staying the
3 subpoenas pending the hearing on this matter and entering a protective order for the documentation
4 being sought (“Motion”). This Motion is made and based upon all of the pleadings and papers on
5 file, the points and authorities contained herein and the Declaration of M Nelson Segel, attached
6 hereto as Exhibit “A.

7 POINTS AND AUTHORITIES

8 FACTUAL BACKGROUND

9 This action was initially commenced by the filing of the original so-called Verified
10 Derivative Complaint on or about the 7th day of March, 2008. An evidentiary hearing was held to
11 enable Judge Denton to make a determination pursuant to NRS §41.520(a)(3). Judge Denton held
12 that “that there is no reasonable possibility that the prosecution of the cause of action alleged in the
13 complaint against the moving party will benefit the corporation or its security holders.” Based upon
14 the evidentiary hearing, Plaintiffs were required to post security in the sum of Seventy Five
15 Thousand Dollars (\$75,000) for Defendants’ attorneys’ fees and costs.

16 Plaintiffs posted the security with the Court and filed a so-called Verified Amended
17 Derivative Complaint (“AMENDED COMPLAINT”) on or about the 22nd day of September, 2008.
18 The AMENDED COMPLAINT named Patrick C. Clary, Esquire (“CLARY”), the attorney for
19 Kokoweef, Inc. (“KOKOWEEF”) as a defendant.

20 The HAHN DEFENDANTS filed a Motion to Dismiss the AMENDED COMPLAINT
21 (“DISMISSAL MOTION”). CLARY and KOKOWEEF joined in the DISMISSAL MOTION.
22 Plaintiffs responded with a Motion to Appoint Receiver and Injunctive Relief (“RECEIVER
23 MOTION”). The Court granted the DISMISSAL MOTION, in part, denied the request for a receiver
24 but granted the injunction relief only to prohibit KOKOWEEF from taking actions that were
25 improper and to which all defendants had agreed would not take place.

26 Answers were filed by the Defendants and a joint case conference was held on Thursday,
27 April 9, 2009, at the hour of 9:00 a.m. On Friday, April 10, 2009, Defendants advised SEGEL that
28 various accounts of KOKOWEEF, Explorations Incorporated of Nevada (“EIN”) and the HAHN

1 DEFENDANTS had been subpoenaed. The subpoenas, copies of which are attached hereto as
2 Exhibit "B", were issued on or about the 27th day of March, 2009, although no notice was ever
3 provided to counsel for the Defendants. Said subpoenas sought documents from KOKOWEEF, EIN,
4 SURPLUS, HAHN and Christina Hahn ("CHRISTINA") who is not a party to this litigation!

5 Upon learning about the issuance of the subpoenas on Friday, April 10, 2009, SEGEL
6 attempted to reach Jennifer Taylor, Esquire ("TAYLOR"), the attorney for Plaintiffs. She responded
7 later in the day that she was leaving Las Vegas for the Easter holiday and would not return until
8 Thursday, April 16, 2009. She also stated that taking action to seek a protective order prior to her
9 return would not be reasonable and in violation of EDCR 2.34.

10 Various emails were traded between TAYLOR and SEGEL. A telephone call occurred on
11 Thursday, April 16, 2009, and again on Monday, April 20, 2009. An agreement was reached that
12 the Defendants would not object to the production of the records relating to KOKOWEEF and EIN
13 and Plaintiffs would withdraw the subpoenas as they related to HAHN and CHRISTINA,
14 individually. No agreement could be reached as to SURPLUS and that is the basis of this Motion.
15 The Declaration of SEGEL attached hereto as Exhibit "A" sets forth the factual basis for the entry
16 of a protective order.

17 LEGAL ARGUMENT

18 THE ISSUANCE OF THE SUBPOENAS WERE IMPROPER SINCE
19 THEY WERE ISSUED PRIOR TO THE NRCP 16.1 CONFERENCE
AND FILING OF THE JOINT CASE CONFERENCE

20 NRCP 26(a) provides:

21 Discovery Methods. At any time after the filing of a joint case conference report, or
22 not sooner than 10 days after a party has filed a separate case conference report, or
23 upon order by the court or discovery commissioner, any party who has complied with
24 Rule 16.1(a)(1) may obtain discovery by one or more of the following additional
25 methods: depositions upon oral examination or written questions; written
interrogatories; production of documents or things or permission to enter upon land
or other property under Rule 34 or **Rule 45(a)(1)(C)**, for inspection and other
purposes; physical and mental examinations; and requests for admission. (Emphasis
added).

26 The actions of Plaintiffs that is in dispute in this Motion is the issuance of subpoenas *prior* to the
27 holding of the case conference pursuant to NRCP 16.1, as well as, failing to notify counsel for
28 Defendants that the subpoenas have been issued.

1 NRCP 45(a)(1)(C) provides:

2 a) Form; Issuance.

3 (1) Every subpoena shall

4 (A) state the name of the court from which it is issued; and

5 (B) state the title of the action, the name of the court in which it is
6 pending, and its civil case number; and

7 (C) command each person to whom it is directed to attend and give
8 testimony or to produce and permit inspection and copying of
9 designated books, documents or tangible things in the possession,
custody or control of that person, or to permit inspection of premises,
at a time and place therein specified; and

10 (D) set forth the text of subdivisions (c) and (d) of this rule.

11 A command to produce evidence or permit inspection may be joined with a command
12 to appear at trial or hearing or at deposition, or may be issued separately.

13 The subpoenas that were issued in this matter were done pursuant to NRCP 45(a)(1)(C) which is
14 prohibited by NRCP 26. Since the subpoenas were issued in violation of NRCP 26, Defendants are
15 entitled to an order quashing the subpoenas.

16 COUNSEL IS REQUIRED TO PROVIDE A COPY OF SUBPOENAS TO
17 OPPOSING COUNSEL AT THE TIME OF ISSUANCE TO AVOID WHAT HAS HAPPENED

18 The propriety of the conduct of Plaintiffs in this matter was addressed by Commissioner
19 Bulla in the March 2009 edition of Nevada Lawyer. The article, entitled "Avoiding Common
20 Mistakes During Discovery", provided:

21 6. Serve Subpoenas On All Parties

22 Attorneys who issue subpoenas must also serve the subpoenas on all parties so that
23 any party desiring to object to the subpoena may do so before documents are
24 produced. The subpoena may include language that the records may be produced
25 pursuant to the subpoena in lieu of attending either a deposition (if a notice of
deposition is served contemporaneously with the subpoena) or appearing at the time
and date noticed in the subpoena for producing the documents.

26 In this case, Plaintiffs caused a subpoena to be issued on or about March 27, 2009, without notice
27 to Defendants who only learned about the subpoenas from the HAHN DEFENDANTS' bank on or
28 about April 10, 2009.

1 The HAHN DEFENDANTS were precluded from seeking a protective order by EDCR 2.34
2 which provides, in pertinent part:

3 (d) Discovery motions may not be filed unless an affidavit of moving counsel is
4 attached thereto setting forth that after a discovery dispute conference or a good faith
5 effort to confer, counsel have been unable to resolve the matter satisfactorily. A
6 conference requires either a personal or telephone conference between or among
7 counsel. Moving counsel must set forth in the affidavit what attempts to resolve the
8 discovery dispute were made, what was resolved and what was not resolved, and the
9 reasons therefor. If a personal or telephone conference was not possible, the affidavit
10 shall set forth the reasons.

11
12 If the responding counsel fails to answer the discovery, the affidavit shall set forth
13 what good faith attempts were made to obtain compliance. If, after request,
14 responding counsel fails to participate in good faith in the conference or to answer
15 the discovery, the court may require such counsel to pay to any other party the
16 reasonable expenses, including attorney's fees, caused by the failure. When a party
17 is not represented by counsel, the party shall comply with this rule.

18 Efforts were made to comply with EDCR 2.34, resulting in the delay of this Motion. SEGEL was
19 not able to speak to counsel for Plaintiffs until Thursday, April 16, 2009, when proposals for
20 resolution were initially discussed.

21 While all of the subpoenas were issued in violation of NRCP 26, and contrary to the rule set
22 forth in Commissioner Bulla's article, the Plaintiffs and Defendants have reached a partial
23 agreement. The Defendants are waiving the defects in the issuance of the subpoenas as they relate
24 to KOKOWEEF and EIN. Plaintiffs are withdrawing the subpoenas as they relate to HAHN and
25 CHRISTINA. Any documents produced for HAHN and CHRISTINA will be returned to SEGEL
26 without reviewing or otherwise disseminating the information. Any documents produced relating
27 to SURPLUS will be held by Plaintiffs' counsel, *in camera*, pending the outcome of this Motion.

28 **PLAINTIFFS HAVE NO LEGITIMATE BASIS FOR THE INVASION OF THE
PERSONAL AND BUSINESS RECORDS OF HAHN DEFENDANTS**

The issue that could not be resolved is the attempt of Plaintiffs to obtain the financial records
of SURPLUS. Each of the subpoenas request the financial or credit card records of SURPLUS.

The main claim that is presently before the Court is whether HAHN or SURPLUS have
diverted assets of KOKOWEEF. Since Plaintiffs have been unable to show the Court that they have
a possibility of success, allowing them to intrude into the personal financial records of HAHN and

1 CHRISTINA and the business financial records of SURPLUS cannot be justified. Plaintiffs have
2 agreed to withdraw the request as it relates to HAHN and CHRISTINA, but continue to demand the
3 records of SURPLUS.

4 The HAHN DEFENDANTS do not believe their personal financial records are proper for
5 disclosure. It does not appear that this specific issue has been addressed in Nevada. The Supreme
6 Court has reviewed the issue in the context of punitive damages in the case *Hetter v. Eighth Judicial*
7 *District Court*, 110 Nev. 513, 874 P.2d 7 (1994). The Court was addressing the request for financial
8 records as they related to punitive damages. The Court recognized in appropriate circumstances,
9 disclosure would be appropriate.

10 In denying access to the financial records, the Court stated, at page 520:

11 While this state does not recognize a privilege for tax returns or necessarily require
12 that liability for punitive damages be established before discovery of financial
13 condition, public policy suggests that tax returns or financial status not be had for the
14 mere asking. Claims for punitive damages can be asserted with ease and can result
15 in abuse and harassment if their assertion alone entitles plaintiff to financial
16 discovery. *See Moran v. International Playtex, Inc.*, 103 A.D.2d 375, 480 N.Y.S.2d
6, 8 (1984). We hold that before tax returns or financial records are discoverable on
the issue of punitive damages, the plaintiff must demonstrate some factual basis for
its punitive damage claim. Disclosure of Hetter's tax returns at this point is
unwarranted.

17 In this case, Plaintiffs have not made a showing that the allegations contained in their pleading has
18 merit. The Court ordered them to post security for the attorneys' fees and costs incurred by
19 Defendants. Allowing the intrusion into the personal and business financial records of the HAHN
20 DEFENDANTS is not justified.

21 HAHN DEFENDANTS ARE ENTITLED TO A STAY OF THE SUBPOENAS

22 EDCR 2.34(e) provides, "(e) [t]he commissioner may stay any disputed discovery proceeding
23 pending resolution by the judge." In the present case, the HAHN DEFENDANTS need a stay to be
24 issued to prevent Plaintiffs from obtaining the confidential business records of SURPLUS. By
25 issuing the subpoenas without notice and prior to the filing of the Joint Case Conference Report as
26 required by NRCP 26, SURPLUS has been deprived of the right to seek an order quashing the
27 subpoenas. However, SURPLUS has been advised that certain documents are ready to be delivered.
28 In fact, Plaintiffs have agreed to allow SURPLUS until Tuesday, April 21, 2009, to file the present

1 Motion. While it is the understanding of SURPLUS that no effort will be make to obtain the records
2 prior to the hearing on this matter, SURPLUS cannot be assured that this will occur. Therefore a
3 stay is necessary to protect SURPLUS' interests.

4 CONCLUSION

5 Based upon the foregoing, the Court should enter an order quashing the subpoenas that were
6 issued prior to the filing of the Joint Case Conference Report and without notice to the HAHN
7 DEFENDANTS, an order shortening time should be issued; or alternatively a stay ordered pending
8 the hearing on this matter.

9 DATED this 20th day of April, 2009.

10 M NELSON SEGEL, CHARTERED

11
12 By 

M NELSON SEGEL, ESQUIRE

Nevada Bar No. 0530

624 South 9th Street

Las Vegas, Nevada 89101

Attorneys for Defendants Larry L. Hahn and
Hahn's World of Surplus, Inc.

Exhibit A

1 7. Ironically, the meet and confer pursuant to NRCP 16.1 occurred at 9:30 a.m. the day
2 before, Thursday, April 9, 2009. As soon as I learned about the improperly issued subpoenas, I
3 attempted to contact Jennifer Taylor, Esquire ("TAYLOR"), counsel for Plaintiffs. When I could
4 not reach her, I sent an email. She responded that afternoon to inform me that she was leaving Las
5 Vegas and would not return until Thursday, April 16, 2009. She informed me that I had to provide
6 her with a reasonable period of time to respond. In an effort to assure that I complied with EDCR
7 2.34, I waited to speak to her. It is my belief that this affidavit complies with the requirements of
8 EDCR 2.34. TAYLOR and I have spoke at least three times and have reached a resolution of a
9 number of issues and are presenting an issue that requires the attention of the Court.

10 8. Various emails were traded between TAYLOR and me. I spoke to her by telephone
11 call occurred on Thursday, April 16, 2009, and again on Monday, April 20, 2009. An agreement was
12 reached that the Defendants would not object to the production of the records relating to
13 KOKOWEEF and EIN and Plaintiffs would withdraw the subpoenas as they related to HAHN and
14 CHRISTINA, individually. No agreement could be reached as to SURPLUS and that is the reason
15 for the Motion.

16 9. TAYLOR advised me on Monday, April 20, 2009, that certain documents had been
17 produced to her. We reached an agreement that she would return the documents relating to HAHN
18 and CHRISTINA without review or disclosure. She also agreed to hold the documents produced for
19 SURPLUS, *in camera*, without disclosure pending the outcome of this Motion.

20 10. The issue that is presently before the Court is whether HAHN or SURPLUS have
21 diverted assets of KOKOWEEF. Since Plaintiffs have been unable to show the Court that they have
22 a possibility of success, allowing them to intrude into the personal financial records of HAHN and

23 ...
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1 CHRISTINA and the business financial records of SURPLUS cannot be justified.

2 11. I believe the subpoena relating to SURPLUS should be quashed and a protective order
3 issued unless Plaintiffs can justify the intrusion.

4 The foregoing is true and correct to the best of my knowledge.

5 DATED this 20th day of April, 2009.

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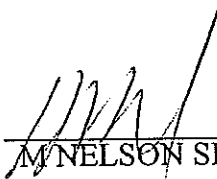

M NELSON SEGEL

Exhibit B



ROBERTSON & VICK, LLP

401 N. Buffalo Dr., Suite 202

Las Vegas, Nevada 89145

Telephone: (702) 247-4661

Facsimile: (702) 247-6227

April 13, 2009

FACSIMILE TRANSMISSION COVER SHEET

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Number of pages in transmission, including cover sheet: 27

To: Patrick C. Clary, Esq.
Facsimile No. 382-7277 Telephone No. 382-0813

To: Nelson Segel, Esq.
Facsimile No. 382-2967 Telephone No. 385-5266

From: Jennifer L. Taylor
Matter: Burke, et al. v. Hahn, et al.
File No.: 5081.01

COMMENT: Attached please find courtesy copies of 5 subpoenas that were served regarding Burke, et al. v. Hahn on March 30, 2009. Signed copies will follow via regular mail.

- COR American Express Company
- COR Nevada State Bank
- COR Citibank (S.D.), N.A.
- COR Home Depot USA Inc.
- COR U.S. Bank National Association

To confirm, or to let us know if you did not receive all of the pages of this transmission, please contact Sue at (702) 247-4661.

1 CC03
 2 ALEXANDER ROBERTSON, IV
 3 State Bar No. 8642
 4 JENNIFER L. TAYLOR
 5 State Bar No. 5798
 6 ROBERTSON & VICK, LLP
 7 401 N. Buffalo Drive, Suite 202
 8 Las Vegas, Nevada 89145
 9 Telephone: (702) 247-4661
 10 Facsimile: (702) 247-6227

Attorneys for Plaintiffs

DISTRICT COURT
 CLARK COUNTY, NEVADA

11 TED R. BURKE; MICHAEL R. and
 12 LAURETTA L. KEHOE; JOHN BERTOLDO;
 13 PAUL BARNARD; EDDY KRAVETZ;
 14 STEVE FRANKS; PAULA MARIA
 15 BARNARD; PETER T. and LISA A.
 16 FREEMAN; LEON GOLDEN; C.A. MURFF;
 17 GERDA FERN BILLBE; BOB and ROBYN
 18 TRESKA; MICHAEL RANDOLPH, and
 19 FREDERICK WILLIS,

CASE NO. A558629
 Dept. XIII

SUBPOENA DUCES TECUM

Plaintiffs,

vs.

18 LARRY H. HAHN, individually, and as
 19 President and Treasurer of Kokoweef, Inc., and
 20 former President and Treasurer of Explorations
 21 Incorporated of Nevada; HAHN'S WORLD OF
 22 SURPLUS, INC., a Nevada corporation; DOES
 23 I-X, inclusive; DOE OFFICERS, DIRECTORS
 24 and PARTICIPANTS I-XX,

Exempt from Arbitration
 (Shareholders Derivative Action-
 Equitable Relief)

Defendants,.

and

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

Nominal Defendants.

ROBERTSON
 & VICK, LLP

1 THE STATE OF NEVADA SENDS GREETINGS TO:

2

Custodian of Records
American Express Company
c/o CT Corporation System
1200 South Pine Island Road
Plantation, Florida 33324

3

4

5 YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside, you
6 appear and attend on the 30th day of April, 2009 at the hour of 3:00 p.m. at the Offices of

7 Robertson & Vick, 401 N. Buffalo Drive, Suite 202, Las Vegas, Nevada 89145 and to have with

8 you at the time and place the items listed in Exhibit "A". These items will be inspected and may

9 be copied at that time. You will not be required to surrender the original items. You may

10 comply with this subpoena by providing legible copies of the items to be produced to the attorney

11 whose name appears on this subpoena on or before the scheduled date of production. You may

12 condition the preparation of the copies upon the payment in advance of the reasonable cost of

13 preparation. You may mail or deliver the copies to the attorney whose name appears on this

14 subpoena and thereby eliminate your appearance at the time and place specified above. You have

15 the right to object to the production pursuant to this subpoena at any time before production by

16 giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT

17 BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

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ROBERTSON
& VICK, LLP

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If you fail to:

(1) appear as specified; or

(2) furnish the records instead of appearing as provided above; or

(3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated: _____

ROBERTSON & VICK, LLP

By _____
JENNIFER TAYLOR, ESQ.

ALEXANDER ROBERTSON, IV
Nevada Bar No. 8642
JENNIFER L. TAYLOR
Nevada Bar No. 5798
401 N. Buffalo Dr., Suite 202
Las Vegas, Nevada 89145
Attorneys for PLAINTIFFS

ROBERTSON
& VICK, LLP 28

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EXHIBIT "A"

ITEMS TO BE PRODUCED

All banking records including bank statements, copies of checks, deposit slips, signature cards, lock box information; all credit card statements, receipts, applications for credit, or related documents for any account in the name of Larry Lou Hahn, aka Larry Leslie Hahn, aka Larry Osc, or Hahn's Christine Hahn, World of Surplus, aka Hahn's Surplus, Kokoweef, Inc., Explorations Inc, of Nevada (aka EIN) and/or any other authorized user on the below accounts, as well as any and all accounts over which the above individuals have signatory power including the following account numbers from 2001 to the present including information on the following account numbers:

Credit Card American Express		3722-603651-62007
Credit Card American Express	EIN and Larry Lou Hahn	3722-603651-63005

ROBERTSON
& VICK, LLP 28

EXHIBIT B
NEVADA RULES OF CIVIL PROCEDURE

1
2 **Rule 45**

3 **(c) Protection of Persons Subject to Subpoena**

4 (1) A party or an attorney responsible for the issuance and service of a subpoena shall
5 take reasonable steps to avoid imposing undue burden or expense on a person subject to that
6 subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and
7 impose upon the party or attorney in breach of this duty an appropriate sanction, which may
8 include but is not limited to lost earnings and a reasonable attorney's fee.

9 (2)(A) A person commanded to produce and permit inspection and copying of designated
10 books, papers, documents or tangible things, or inspection of premises, need not appear in person
11 at the place of production or inspection unless commanded to appear for deposition, hearing or
12 trial.

13 (2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and
14 permit inspection and copying may, within 14 days after service of the subpoena or before the
15 time specified for compliance if such time is less than 14 days after service, serve upon the party
16 or attorney designated in the subpoena written objection to inspection or copying of any or all of
17 the designated materials or of the premises. If objection is made, the party serving the subpoena
18 shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to
19 an order of the court by which the subpoena was issued. If objection has been made, the party
20 serving the subpoena may, upon notice to the person commanded to produce, move at any time
21 for an order to compel the production. Such an order to compel production shall protect any
22 person who is not a party or an officer of a party from significant expense resulting from the
23 inspection and copying commanded.

24 (3)(A) On timely motion, the court by which the subpoena was issued shall quash or
25 modify the subpoena if it

26 (i) fails to allow reasonable time for compliance;
27 (ii) requires a person who is not a party or an officer of a party to travel to a
28 place more than 100 miles from the place where that person resides, is employed or regularly
transacts business in person, except that such a person may in order to attend trial be commanded
to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no
exception or waiver applies, or

(iv) subjects a person to undue burden.

(3)(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research,
development, or commercial information, or,

(ii) requires disclosure of an unretained expert's opinion or information not
describing specific events or occurrences in dispute and resulting from the expert's study
made not at the request of any party, the court may, to protect a person subject to or affected by
the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
issued, shows a substantial need for the testimony or material that cannot be otherwise met
without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

24 **(d) Duties in Responding to Subpoena.**

25 (1) A person responding to a subpoena to produce documents shall produce them as
26 they are kept in the usual course of business or shall organize and label them to correspond with
27 the categories in the demand.

28 (2) When information subject to a subpoena is withheld on a claim that it is
privileged or subject to protection as trial preparation materials, the claim shall be made
expressly and shall be supported by a description of the nature of the documents,
communications or things not produced that is sufficient to enable the demanding party to contest
the claim.

RETURN OF SERVICE

State of Nevada

County of Clark

District Court

Case Number: A558629 Court Date: 4/30/2009 3:00 pm

Plaintiff:

TED R. BURKE; MICHAEL R. and LAURETA L. KEHOE; JOHN BERTOLDO; PAUL BARNARD; EDDY KRAVETZ; STEVE FRANKS; PAULA MARIA BARNARD; PETER T. and LISA A. FREEMAN; LEON GOLDEN; C.A.A. MURFF; GERDA FERN BILLBE; BOB and ROBYN TRESKA; MICHAEL RANDOLPH, and FREDERICK WILLIS

vs.

Defendant:

LARRY H. HAN, Individually, and a President and Treasurer of Explorations Incorporated of Nevada; HAHN'S WORLD OF SURPLUS, INC., a Nevada corporation; DOES I-X, Inclusive; DOE OFFICERS, DIRECTORS and PARTICIPANTS I-XX

For:

Jennifer L. Taylor, Esq.

Received by AM:PM Legal Solutions on the 30th day of March, 2009 at 9:20 am to be served on American Express Company, c/o CT Corporation System, Registered Agent /RC, 1200 S. Pine Island Rd., Plantation, FL 33324.

I, Eric Deal, do hereby affirm that on the 30th day of March, 2009 at 1:32 pm, I:

Served the within corporation by delivering a true copy of the Subpoena Duces Tecum; Exhibits on CT CORP SYSTEMS as Registered Agent, of the within named corporation, at 1200 S. Pine Island Rd., Plantation, FL 33324, pursuant to F.S. 48.081(3).

Additional Information pertaining to this Service:

For contact Donna Moch, Section Head Process for CT CORP.

I certify that I am over the age of 18, have no interest in the above action, and am a Special Process Server, in good standing, in the judicial circuit in which the process was served.

Under Penalties of Perjury, I declare I have read the foregoing document and the facts stated in it are true. NO NOTARY REQUIRED PURSUANT TO F.S. 92.525(2)



Eric Deal
SPS 336

AM:PM Legal Solutions
620 S. 7th Street
Suite B
Las Vegas, NV 89101
(702) 385-2676
Our Job Serial Number: 2008009048
Ref: 1114

1 CC03
 2 ALEXANDER ROBERTSON, IV
 3 State Bar No. 8642
 4 JENNIFER L. TAYLOR
 5 State Bar No. 5798
 6 ROBERTSON & VICK, LLP
 7 401 N. Buffalo Drive, Suite 202
 8 Las Vegas, Nevada 89145
 9 Telephone: (702) 247-4661
 10 Facsimile: (702) 247-6227

Attorneys for Plaintiffs

DISTRICT COURT
 CLARK COUNTY, NEVADA

11 TED R. BURKE; MICHAEL R. and) CASE NO. A558629
 12 LAURETTA L. KEHOE; JOHN BERTOLDO;) Dept. XIII
 13 PAUL BARNARD; EDDY KRAVETZ;)
 14 STEVE FRANKS; PAULA MARIA)
 15 BARNARD; PETER T. and LISA A.)
 16 FREEMAN; LEON GOLDEN; C.A. MURFF;) SUBPOENA DUCES TECUM
 17 GERDA FERN BILLBE; BOB and ROBYN)
 18 TRESKA; MICHAEL RANDOLPH, and)
 19 FREDERICK WILLIS,)

Plaintiffs,

vs.

18 LARRY H. HAHN, individually, and as)
 19 President and Treasurer of Kokoweef, Inc., and)
 20 former President and Treasurer of Explorations) Exempt from Arbitration
 21 Incorporated of Nevada; HAHN'S WORLD OF) (Shareholders Derivative Action-
 22 SURPLUS, INC., a Nevada corporation; DOES) Equitable Relief
 23 I-X, inclusive; DOE OFFICERS, DIRECTORS)
 24 and PARTICIPANTS I-XX,)

Defendants,.

and

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

Nominal Defendants.

ROBERTSON
 & VICK, LLP

1 THE STATE OF NEVADA SENDS GREETINGS TO:

2 Custodian of Records
3 Nevada State Bank
4 c/o CSC Services of Nevada, Inc.
5 502 E. John Street
6 Carson City, Nevada 89706

7 YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
8 you appear and attend deposition on the 30th day of April, 2009 at 1:30 p.m. at the Offices of
9 Robertson & Vick, 401 N. Buffalo Drive, Suite 202, Las Vegas, Nevada 89145. Your attendance
10 is required to give testimony and/or to produce and permit inspection and copying of designated
11 books, documents or tangible things in your possession, custody or control, or to permit
12 inspection of premises. You are required to bring with you at the time of your appearance any
13 items set forth in Exhibit "A". If you fail to attend, you may be deemed guilty of contempt of
14 Court and liable to pay all losses and damages caused by your failure to appear. In lieu of
15 personal appearance, records may be produced to Robertson & Vick no later than April 17, 2009.
16 Please see Exhibit "B" attached hereto for information regarding the rights of the person subject
17 to this Subpoena.

18 ROBERTSON & VICK, LLP

19
20 By _____
21 ALEXANDER ROBERTSON, IV
22 Nevada Bar No. 8642
23 JENNIFER L. TAYLOR
24 Nevada Bar No. 5798
25 401 N. Buffalo Dr., Suite 202
26 Las Vegas, Nevada 89145
27 Attorneys for PLAINTIFFS

28 ROBERTSON
& VICK, LLP

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EXHIBIT "A"

ITEMS TO BE PRODUCED

All banking records including bank statements, copies of checks, deposit slips, signature cards, lock box information; all credit card statements, receipts, applications for credit, or related documents for any account in the name of Larry Lou Hahn, aka Larry Leslie Hahn, aka Larry Osc, or Hahn's Christine Hahn, World of Surplus, aka Hahn's Surplus, Kokoweef, Inc., Explorations Inc. of Nevada (aka EIN) and/or any other authorized user on the below accounts, as well as any and all accounts over which the above individuals have signatory power including the following account numbers from 2001 to the present including information on the following account numbers:

Bank account Nevada State Bank Hahn's Surplus 0072013139

ROBERTSON
& VICK, LLP 28

EXHIBIT B
NEVADA RULES OF CIVIL PROCEDURE

1
2 Rule 45

3 (c) **Protection of Persons Subject to Subpoena**

4 (1) A party or an attorney responsible for the issuance and service of a subpoena shall
5 take reasonable steps to avoid imposing undue burden or expense on a person subject to that
6 subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and
7 impose upon the party or attorney in breach of this duty an appropriate sanction, which may
8 include but is not limited to lost earnings and a reasonable attorney's fee.

9 (2)(A) A person commanded to produce and permit inspection and copying of designated
10 books, papers, documents or tangible things, or inspection of premises, need not appear in person
11 at the place of production or inspection unless commanded to appear for deposition, hearing or
12 trial.

13 (2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and
14 permit inspection and copying may, within 14 days after service of the subpoena or before the
15 time specified for compliance if such time is less than 14 days after service, serve upon the party
16 or attorney designated in the subpoena written objection to inspection or copying of any or all of
17 the designated materials or of the premises. If objection is made, the party serving the subpoena
18 shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to
19 an order of the court by which the subpoena was issued. If objection has been made, the party
20 serving the subpoena may, upon notice to the person commanded to produce, move at any time
21 for an order to compel the production. Such an order to compel production shall protect any
22 person who is not a party or an officer of a party from significant expense resulting from the
23 inspection and copying commanded.

24 (3)(A) On timely motion, the court by which the subpoena was issued shall quash or
25 modify the subpoena if it

- 26 (i) fails to allow reasonable time for compliance;
- 27 (ii) requires a person who is not a party or an officer of a party to travel to a
28 place more than 100 miles from the place where that person resides, is employed or regularly
transacts business in person, except that such a person may in order to attend trial be commanded
to travel from any such place within the state in which the trial is held, or
- (iii) requires disclosure of privileged or other protected matter and no
exception or waiver applies, or
- (iv) subjects a person to undue burden.

29 (3)(B) If a subpoena

- 30 (i) requires disclosure of a trade secret or other confidential research,
31 development, or commercial information, or,
- 32 (ii) requires disclosure of an unretained expert's opinion or information not
33 describing specific events or occurrences in dispute and resulting from the expert's study
34 made not at the request of any party, the court may, to protect a person subject to or affected by
35 the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
36 issued, shows a substantial need for the testimony or material that cannot be otherwise met
37 without undue hardship and assures that the person to whom the subpoena is addressed will be
38 reasonably compensated, the court may order appearance or production only upon specified
conditions.

39 (d) **Duties in Responding to Subpoena.**

40 (1) A person responding to a subpoena to produce documents shall produce them as
41 they are kept in the usual course of business or shall organize and label them to correspond with
42 the categories in the demand.

43 (2) When information subject to a subpoena is withheld on a claim that it is
44 privileged or subject to protection as trial preparation materials, the claim shall be made
45 expressly and shall be supported by a description of the nature of the documents,
46 communications or things not produced that is sufficient to enable the demanding party to contest
47 the claim.

ROBERTSON
& VICK, LLP

28

1 AFFIDAVIT of SERVICE

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DISTRICT COURT STATE OF NEVADA
COUNTY OF CLARK

5

6

TED R. BURKE, MICHAEL R. and LAURETTA L. KEHOE, JOHN BERTOLDO; PAUL BARNARD; EDDY KRAVETZ; STEVE FRANK; PAULA MARIA BARNARD; PETER T. and LISA A. FREEMAN; LEON GOLDEN; C.A. MURFF; GERDA FERN BILLBE; BOB and ROBYN TRESKA; MICHAEL RANDOLPH, and FREDERICK WILLIS,

CASE NO. A588629

DEPT. NO. XIII

7

8

9

Plaintiffs,

AFFIDAVIT of SERVICE.

10

vs

SUBPOENA DUCES TECUM

11

LARRY H. HAN, individually, and as President and Treasurer of Kokowest, Inc., and former President and Treasurer of Exploration Incorporated of Nevada; HAHN'S WORLD OF SURPLUS, INC., a Nevada corporation; DOES I - X, inclusive; DOE OFFICERS, DIRECTORS and PARTICIPANTS I - XX,

NEVADA STATE BANK

12

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Defendants,

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STATE OF NEVADA)
COUNTY OF WASHOE) ss:

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PATRICK J. PEREGRIN, hereby states that affiant is over 18 years of age, licensed to serve civil process in the State of Nevada, and not a party to, nor interested in, the above-captioned action.

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20

March 27, 2009, affiant received a Subpoena Duces Tecum service upon Nevada State Bank.

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March 30, 2009 at 1:05 p.m., Affiant served a true and correct copy of the Subpoena Duces Tecum upon Nevada State Bank, accepted by Cyndy Woodgate of OSC Services of Nevada, Inc., as Resident Agent, at 502 E. John St., Ste., "E", in the City of Carson, State of Nevada.

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I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

25

FURTHER YOUR AFFIANT SAYETH NAUGHT

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EXECUTED March 30, 2009

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SUBSCRIBED and SWORN to before me, March 30, 2009 by Patrick Peregrin

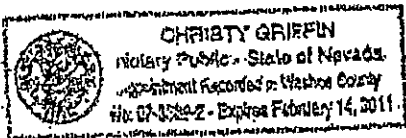
28

Christy Griffin

NOTARY PUBLIC

Patrick Peregrin

Patrick Peregrin



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 3 State Bar No. 8642
 4 JENNIFER L. TAYLOR
 5 State Bar No. 5798
 6 ROBERTSON & VICK, LLP
 7 401 N. Buffalo Drive, Suite 202
 8 Las Vegas, Nevada 89145
 9 Telephone: (702) 247-4661
 10 Facsimile: (702) 247-6227

11 Attorneys for Plaintiffs

12 DISTRICT COURT
 13 CLARK COUNTY, NEVADA

14

<p>11 TED R. BURKE; MICHAEL R. and 12 LAURETTA L. KEHOE; JOHN BERTOLDO; 13 PAUL BARNARD; EDDY KRAVETZ; 14 STEVE FRANKS; PAULA MARIA 15 BARNARD; PETER T. and LISA A. 16 FREEMAN; LEON GOLDEN; C.A. MURFF; 17 GERDA FERN BILLBE; BOB and ROBYN 18 TRESKA; MICHAEL RANDOLPH, and 19 FREDERICK WILLIS,</p>	}	<p>CASE NO. A558629 Dept. XIII</p> <p>SUBPOENA DUCES TECUM</p>
---	---	---

20 Plaintiffs,

21 vs.

22 LARRY H. HAHN, individually, and as
 23 President and Treasurer of Kokoweef, Inc., and
 24 former President and Treasurer of Explorations
 25 Incorporated of Nevada; HAHN'S WORLD OF
 26 SURPLUS, INC., a Nevada corporation; DOES
 27 I-X, inclusive; DOE OFFICERS, DIRECTORS
 28 and PARTICIPANTS I-XX,

Exempt from Arbitration
 (Shareholders Derivative Action-
 Equitable Relief)

29 Defendants,.

30 and

31 KOKOWEEF, INC, a Nevada corporation;
 32 EXPLORATIONS INCORPORATED OF
 33 NEVADA, a dissolved corporation;

34 Nominal Defendants.

ROBERTSON
 & Vick, LLP 28

1 THE STATE OF NEVADA SENDS GREETINGS TO:

2 Custodian of Records
3 Citibank S.D., N.A.
4 8725 W. Sahara Avenue
5 Las Vegas, Nevada 89117-5873

6 YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
7 you appear and attend deposition on the 30th day of April, 2009 at 12:00 p.m. at the Offices of
8 Robertson & Vick, 401 N. Buffalo Drive, Suite 202, Las Vegas, Nevada 89145. Your attendance
9 is required to give testimony and/or to produce and permit inspection and copying of designated
10 books, documents or tangible things in your possession, custody or control, or to permit
11 inspection of premises. You are required to bring with you at the time of your appearance any
12 items set forth in Exhibit "A". If you fail to attend, you may be deemed guilty of contempt of
13 Court and liable to pay all losses and damages caused by your failure to appear. In lieu of
14 personal appearance, records may be produced to Robertson & Vick no later than April 17, 2009.
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16 to this Subpoena.

17 ROBERTSON & VICK, LLP

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19 By _____
20 ALEXANDER ROBERTSON, IV
21 Nevada Bar No. 8642
22 JENNIFER L. TAYLOR
23 Nevada Bar No. 5798
24 401 N. Buffalo Dr., Suite 202
25 Las Vegas, Nevada 89145
26 Attorneys for PLAINTIFFS

27 ROBERTSON
28 & VICK, LLP

1

EXHIBIT "A"

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ITEMS TO BE PRODUCED

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4 All banking records including bank statements, copies of checks, deposit slips, signature cards,
 5 lock box information; all credit card statements, receipts, applications for credit, or related
 6 documents for any account in the name of Larry Lou Hahn, aka Larry Leslie Hahn, aka Larry
 7 Osc, or Hahn's Christine Hahn, World of Surplus, aka Hahn's Surplus, Kokoweef, Inc.,
 8 Explorations Inc. of Nevada (aka EIN) and/or any other authorized user on the below accounts,
 9 as well as any and all accounts over which the above individuals have signatory power including
 10 the following account numbers from 2001 to the present including information on the following
 11 account numbers:

9	Credit Card Citibank	EIN and Larry Lou Hahn	5472-3301-0142-4991
10	Credit Card Citibank	Larry Lou Hahn	5472-3301-0627-9325
11	Credit Card Citibank	name unknown	5424-1803-5218-1470

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ROBERTSON
& VICK, LLP 28

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EXHIBIT B**NEVADA RULES OF CIVIL PROCEDURE**

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Rule 45**(c) Protection of Persons Subject to Subpoena**

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(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include but is not limited to lost earnings and a reasonable attorney's fee.

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(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises, need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

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(2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

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(3)(A) On timely motion, the court by which the subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(3)(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or,

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued, shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

24

(d) Duties in Responding to Subpoena.

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(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications or things not produced that is sufficient to enable the demanding party to contest the claim.

AFFIDAVIT OF SERVICE

State of Nevada

County of Clark

District Court

Case Number: A558629 DEPT. XIII Court Date: 4/30/2009

Plaintiff:

Ted R. Burke; Michael R. and Laurretta L. Kehoe; John Bertoldo; Paul Barnard; Eddy Kravetz; Steve Franks; Paula Maria Barnard; Peter T. and Lisa A. Freeman; Leon Golden; C.A. Murff; Gerda Fern Billbe; Bob and Robyn Traska; Michael Randolph; Frederick Willis

vs.

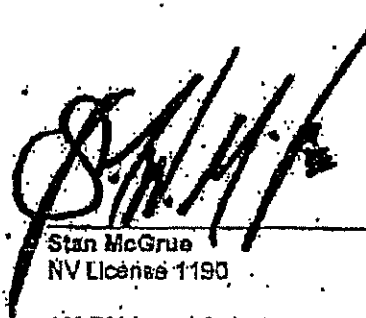
Defendant:

Larry H. Hahn; Individually and as President and Treasurer of Kokowarf, Inc., and former President and Treasurer of Explorations Incorporated of Nevada; Hahn's World of Surplus, Inc., a Nevada corporation

Received by AM:PM Legal Solutions on the 27th day of March, 2009 at 3:15 pm to be served on COR for Citibank S.D., N.A., 8725 W. Sahara Ave., Las Vegas, NV 89117.

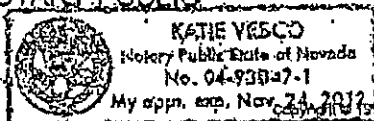
I, Stan McGrue, being duly sworn, depose and say that on the 30th day of March, 2009 at 10:31 am, I:

at all times herein was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made and served the within named Witness by delivering a true and correct copy of the Subpoena Duces Tecum on the date and hour of service endorsed thereon by me, at the aforementioned address, to, Diané Gonzalez (COR) as an individual/agent authorized to accept service for the within named Witness.


Stan McGrue
NV License 1190

Subscribed and Sworn to me on the 30th day of March, 2009 . . .


NOTARY PUBLIC


KATHY YESCO
Notary Public State of Nevada
No. 04-93817-1
My exp. exp. Nov 24, 2012

AM:PM Legal Solutions
520 S. 7th St., Ste. B
Las Vegas, NV 89104
(702) 385-2675

Our Job Serial Number: 2009001110
Ref. 5081.01

1 CC03
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11 Attorneys for Plaintiffs

12 DISTRICT COURT
 13 CLARK COUNTY, NEVADA

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20 Plaintiffs,

21 vs.

<p>18 LARRY H. HAHN, individually, and as 19 President and Treasurer of Kokoweef, Inc., and 20 former President and Treasurer of Explorations 21 Incorporated of Nevada; HAHN'S WORLD OF 22 SURPLUS, INC., a Nevada corporation; DOES 23 I-X, inclusive; DOE OFFICERS, DIRECTORS 24 and PARTICIPANTS I-XX,</p>	}	<p>Exempt from Arbitration (Shareholders Derivative Action- Equitable Relief)</p>
--	---	---

25 Defendants,

26 and

27 KOKOWEEF, INC, a Nevada corporation;
 28 EXPLORATIONS INCORPORATED OF
 NEVADA, a dissolved corporation;

Nominal Defendants.

ROBERTSON & VICK, LLP

1 THE STATE OF NEVADA SENDS GREETINGS TO:

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3 Home Depot USA Inc.
4 c/o CSC Services of Nevada, Inc.
5 502 E. John Street
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11 books, documents or tangible things in your possession, custody or control, or to permit
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18 ROBERTSON & VICK, LLP

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21 Nevada Bar No. 8642
22 JENNIFER L. TAYLOR
23 Nevada Bar No. 5798
24 401 N. Buffalo Dr., Suite 202
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26 Attorneys for PLAINTIFFS

27 ROBERTSON
28 & VICK, LLP

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Credit Card Home Depot	Hahn's Surplus	6035-3221-2957-3964
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ROBERTSON
& VICK, LLP 28

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EXHIBIT B
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Rule 45

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(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications or things not produced that is sufficient to enable the demanding party to contest the claim.

ROBERTSON
& VICK, LLP

1 AFFIDAVIT of SERVICE

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3

4

DISTRICT COURT STATE OF NEVADA

6

COUNTY OF CLARK

6

TED R. BURKE, MICHAEL R. and LAURETTA L. KEHOE, JOHN BERTOLDO; PAUL BARNARD; EDDY KRAVETZ; STEVE FRANK; PAULA MARIA BARNARD; PETER T. and LISA A. FREEMAN; LEON GOLDEN; C.A. MURFF; GERDA FERN BILLBE; BOB and ROBYN TRESKA; MICHAEL RANDOLPH, and FREDERICK WILLIS,

CASE NO. A558629

DEPT. NO. XIII

7

AFFIDAVIT of SERVICE

8

SUBPOENA DUCES TECUM

9

Plaintiffs,

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vs

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LARRY H. HAN, individually, and as President and Treasurer of Kokoweef, Inc., and former President and Treasurer of Exploration Incorporated of Nevada; HAHN'S WORLD OF SURPLUS, INC., a Nevada corporation; DOES I - X, inclusive; DOE OFFICERS, DIRECTORS and PARTICIPANTS I - XX,

HOME DEPOT USA, INC.

12

13

14

Defendants,

15

STATE OF NEVADA)
COUNTY OF WASHOE) Ss:

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17

PATRICK J. PEREGRIN, heraby states that affiant is over 18 years of age, licensed to serve civil process in the State of Nevada, and not a party to, nor interested in, the above-captioned action.

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March 27, 2009, affiant received a Subpoena Duces Tecum service upon Home Depot USA, Inc.

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March 30, 2009 at 1:05 p.m., Affiant served a true and correct copy of the Subpoena Duces Tecum upon Home Depot USA, Inc., accepted by Cyndy Woodgate of CSC Services of Nevada, Inc., as Resident Agent, at 502 E. John St., Ste., "E", in the City of Carson, State of Nevada.

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23

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

24

FURTHER YOUR AFFIANT SAYETH NAUGHT

25

EXECUTED March 30, 2009

26

SUBSCRIBED and SWORN to before me, March 30, 2009 by Patrick Peregrin

27

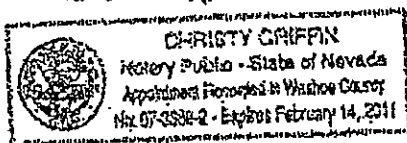
Christy Griffin

NOTARY PUBLIC

Patrick Peregrin

Patrick Peregrin

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1 CC03
 2 ALEXANDER ROBERTSON, IV
 3 State Bar No. 8642
 4 JENNIFER L. TAYLOR
 5 State Bar No. 5798
 6 ROBERTSON & VICK, LLP
 7 401 N. Buffalo Drive, Suite 202
 8 Las Vegas, Nevada 89145
 9 Telephone: (702) 247-4661
 10 Facsimile: (702) 247-6227

11 Attorneys for Plaintiffs

12 DISTRICT COURT
 13 CLARK COUNTY, NEVADA

14

11 TED R. BURKE; MICHAEL R. and 12 LAURETTA L. KEHOE; JOHN BERTOLDO; 13 PAUL BARNARD; EDDY KRAVETZ; 14 STEVE FRANKS; PAULA MARIA 15 BARNARD; PETER T. and LISA A. 16 FREEMAN; LEON GOLDEN; C.A. MURFF; 17 GERDA FERN BILLBE; BOB and ROBYN 18 TRESKA; MICHAEL RANDOLPH, and 19 FREDERICK WILLIS,	}	CASE NO. A558629 Dept. XIII SUBPOENA DUCES TECUM
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20 Plaintiffs,

21 vs.

18 LARRY H. HAHN, individually, and as 19 President and Treasurer of Kokoweef, Inc., and 20 former President and Treasurer of Explorations 21 Incorporated of Nevada; HAHN'S WORLD OF 22 SURPLUS, INC., a Nevada corporation; DOES 23 I-X, inclusive; DOE OFFICERS, DIRECTORS 24 and PARTICIPANTS I-XX,	}	Exempt from Arbitration (Shareholders Derivative Action- Equitable Relief)
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25 Defendants,

26 and

27 KOKOWEEF, INC, a Nevada corporation;
 28 EXPLORATIONS INCORPORATED OF
 NEVADA, a dissolved corporation;

Nominal Defendants.

ROBERTSON & VICK, LLP 28

1 THE STATE OF NEVADA SENDS GREETINGS TO:

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Custodian of Records
U.S. Bank National Association
2200 E. Lake Mead Blvd.
North Las Vegas, Nevada 89030

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside, you appear and attend deposition on the 30th day of April, 2009 at 9:00 a.m. at the Offices of Robertson & Vick, 401 N. Buffalo Drive, Suite 202, Las Vegas, Nevada 89145. Your attendance is required to give testimony and/or to produce and permit inspection and copying of designated books, documents or tangible things in your possession, custody or control, or to permit inspection of premises. You are required to bring with you at the time of your appearance any items set forth in Exhibit "A". If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. In lieu of personal appearance, records may be produced to Robertson & Vick no later than April 17, 2009. Please see Exhibit "B" attached hereto for information regarding the rights of the person subject to this Subpoena.

ROBERTSON & VICK, LLP

By _____
ALEXANDER ROBERTSON, IV
Nevada Bar No. 8642
JENNIFER L. TAYLOR
Nevada Bar No. 5798
401 N. Buffalo Dr., Suite 202
Las Vegas, Nevada 89145
Attorneys for PLAINTIFFS

ROBERTSON
& VICK, LLP 28

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EXHIBIT "A"

ITEMS TO BE PRODUCED

All banking records including bank statements, copies of checks, deposit slips, signature cards, lock box information; all credit card statements, receipts, applications for credit, or related documents for any account in the name of Larry Lou Hahn, aka Larry Leslie Hahn, aka Larry Osc, or Hahn's Christine Hahn, World of Surplus, aka Hahn's Surplus, Kokoweef, Inc., Explorations Inc. of Nevada (aka EIN) and/or any other authorized user on the below accounts, as well as any and all accounts over which the above individuals have signatory power including the following account numbers from 2001 to the present including information on the following account numbers:

Bank account US Bank	Hahn's Surplus	153700849901
Bank account US Bank	EIN	153700554121
Bank account US Bank	Kokoweef	153790903683
Credit Card US Bank	Kokoweef	4798-1738-7000-0012
Credit Card US Bank	Kokoweef	4798-1738-7000-0020

ROBERTSON
& VICK, LLP

EXHIBIT B
NEVADA RULES OF CIVIL PROCEDURE

1
2 Rule 45

3 (c) Protection of Persons Subject to Subpoena

4 (1) A party or an attorney responsible for the issuance and service of a subpoena shall
5 take reasonable steps to avoid imposing undue burden or expense on a person subject to that
6 subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and
7 impose upon the party or attorney in breach of this duty an appropriate sanction, which may
8 include but is not limited to lost earnings and a reasonable attorney's fee.

9 (2)(A) A person commanded to produce and permit inspection and copying of designated
10 books, papers, documents or tangible things, or inspection of premises, need not appear in person
11 at the place of production or inspection unless commanded to appear for deposition, hearing or
12 trial.

13 (2)(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and
14 permit inspection and copying may, within 14 days after service of the subpoena or before the
15 time specified for compliance if such time is less than 14 days after service, serve upon the party
16 or attorney designated in the subpoena written objection to inspection or copying of any or all of
17 the designated materials or of the premises. If objection is made, the party serving the subpoena
18 shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to
19 an order of the court by which the subpoena was issued. If objection has been made, the party
20 serving the subpoena may, upon notice to the person commanded to produce, move at any time
21 for an order to compel the production. Such an order to compel production shall protect any
22 person who is not a party or an officer of a party from significant expense resulting from the
23 inspection and copying commanded.

24 (3)(A) On timely motion, the court by which the subpoena was issued shall quash or
25 modify the subpoena if it

26 (i) fails to allow reasonable time for compliance;
27 (ii) requires a person who is not a party or an officer of a party to travel to a
28 place more than 100 miles from the place where that person resides, is employed or regularly
transacts business in person, except that such a person may in order to attend trial be commanded
to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no
exception or waiver applies, or

(iv) subjects a person to undue burden.

(3)(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research,
development, or commercial information, or,

(ii) requires disclosure of an unretained expert's opinion or information not
describing specific events or occurrences in dispute and resulting from the expert's study
made not at the request of any party, the court may, to protect a person subject to or affected by
the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is
issued, shows a substantial need for the testimony or material that cannot be otherwise met
without undue hardship and assures that the person to whom the subpoena is addressed will be
reasonably compensated, the court may order appearance or production only upon specified
conditions.

24 (d) Duties in Responding to Subpoena.

25 (1) A person responding to a subpoena to produce documents shall produce them as
26 they are kept in the usual course of business or shall organize and label them to correspond with
27 the categories in the demand.

28 (2) When information subject to a subpoena is withheld on a claim that it is
privileged or subject to protection as trial preparation materials, the claim shall be made
expressly and shall be supported by a description of the nature of the documents,
communications or things not produced that is sufficient to enable the demanding party to contest
the claim.

AFFIDAVIT OF SERVICE

State of Nevada

County of Clark

District Court

Case Number: A568829 DEPT. XIII Court Date: 4/30/2009

Plaintiff:

Ted R. Burke; Michael R. and Lauretta L. Kehoe; John Bertoldo; Paul Barnard; Eddy Kravetz; Steve Franks; Paula Maria Barnard; Peter T. and Lisa A. Freeman; Leon Golden; C.A. Murff; Gerda Fern Billbe; Bob and Robyn Trecka; Michael Randolph; Frederick Willis

vs.

Defendant:

Larry H. Hahn, individually and as President and Treasurer of Kokowasf, Inc., and former President and Treasurer of Explorations Incorporated of Nevada; Hahn's World of Surplus, Inc., a Nevada corporation

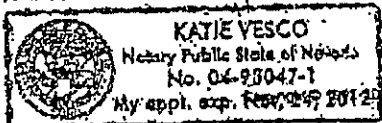
Received by AM:PM Legal Solutions on the 27th day of March, 2009 at 3:15 pm to be served on COR for U.S. Bank National Association, 2200 E. Lake Mead Blvd., N. Las Vegas, NV 89030.

I, Stan McGrue, being duly sworn, depose and say that on the 27th day of March, 2009 at 3:58 am, I:

at all times herein was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceeding in which this affidavit is made and served the within named Witness by delivering a true and correct copy of the Subpoena Duces Tecum on the date and hour of service endorsed thereon by me, at the aforementioned address, to, Alicia Perez (Customer Service Manager) as an individual/agent authorized to accept service for the within named Witness.

Subscribed and Sworn to me on the 30th day of March, 2009.

NOTARY PUBLIC



Stan McGrue
NV License 1190

AM:PM Legal Solutions
820 S. 7th St., Ste. B
Las Vegas, NV 89101
(702) 385-2676

Our Job Serial Number: 2009001111
Ref: 5081:01