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Cliff R.
CLERK OF THE COURT

1 OST - 0026
Neil J. Beller, Esq.
2 Nevada Bar No. 002360
NEIL J. BELLER, LTD
3 7408 W. Sahara Ave.
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4 (702) 368-7767
(702) 368-7720 Facsimile
5 Attorney for Plaintiffs

6
7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 TED R. BURKE; MICHAEL R and LAURETTA)
L. KEHOE; JOHN BERTOLDO; PAUL)
10 BARNARD; EDDY KRAVETZ; JACKIE and)
FRED KRAVETZ; STEVEN FRANKS; PAULA)
11 MARIA BARNARD; PETER T. and LISA A)
FREEMAN; LEON GOLDEN; C.A. MURFF;)
12 GERDA FERN BILLBE; BOB and ROBYN)
TRESKA; MICHAEL RANDOLPH, and)
13 FREDERICK WILLIS,)

Case No. A558629
Dept. XIII

14 Plaintiffs,

15 vs.

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

20 Defendants,

21 and

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

24 Nominal Defendants.
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**MOTION TO CONTINUE
EVIDENTIARY HEARING
ON DEFENDANT'S RENEWED
MOTION TO REQUIRE
SECURITY FROM PLAINTIFFS**

Date of Hearing: _____

Time of Hearing: _____

26 COMES NOW the Plaintiffs, by and through their attorney of record, NEIL J. BELLER,
27 ESQ., of the law firm of NEIL J. BELLER, LTD, and moves this Court for an Order Shortening Time
28 for the hearing of Plaintiffs' MOTION TO CONTINUE EVIDENTIARY HEARING ON

LAW OFFICES
NEIL J. BELLER, LTD.
A PROFESSIONAL CORPORATION
7408 WEST SAHARA AVENUE
LAS VEGAS, NEVADA 89117
AREA CODE 702-368-7767



1 DEFENDANT'S RENEWED MOTION TO REQUIRE SECURITY FROM PLAINTIFFS.

2 This Motion is made and based on the pleadings and papers on file herein, the Points and
3 Authorities, the attached Affidavits, and any argument of counsel at the time of the hearing of this
4 motion.

5 DATED this 23 day of June, 2008.

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NEIL J. BELLER, LTD.

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By:  #7301 / dv

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NEIL J. BELLER, ESQ.
Nevada Bar No. 2360
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
(702)368-7767
Attorney for Plaintiffs

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ORDER SHORTENING TIME

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It appearing to the satisfaction of the Court, and good cause appearing therefor, IT IS
HEREBY ORDERED that the foregoing MOTION TO CONTINUE EVIDENTIARY
HEARING ON DEFENDANT'S RENEWED MOTION TO REQUIRE SECURITY FROM
PLAINTIFFS shall be heard on the 26th day of June, 2008, at the hour of 10:00 a. m. in
Department XIII.

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MARK S. DENTON

DISTRICT JUDGE

to Strike believed that I would not be leaving town until June 29, 2008. Once it was determined that this Court had set an evidentiary hearing for Friday, June 27, 2008, it became necessary for Plaintiffs to file a Motion to Continue.

5. If the hearing on the 27th were only for the motion to require security from plaintiffs, then, I would be able to attend; but because Mr. Clary, requested an evidentiary hearing on an order shortening time, and based on my years of legal experience, I anticipate the hearing will take considerably longer than two hours. . Additionally, due to the Arbitration beginning Sunday and continuing through Wednesday, June 25th, my time is limited in which to prepare for a proper presentation at an evidentiary hearing. Because, out of necessity that I must leave by 12:30 p.m., I would not be able to be present should the hearing run beyond 12:30 p.m. If this Court does not grant Plaintiffs' Motion to Continue, Larry Smith, Esq. of Benson & Bertoldo will be present with me at the hearing on June 27th, but he has not previously been involved in this matter, and it would be an injustice to my clients to have another attorney not completely familiar with the matter continue with the hearing.

6. This Motion is not brought for the purpose of delay but to provide justice to the Plaintiffs.


NEIL J. BELLER, ESQ.

1 POINTS AND AUTHORITIES

2 Patrick C. Clary, Esq., counsel for Kokoweef, Inc. filed its Renewed Motion to Require
3 Security from Plaintiffs on June 12, 2008. Plaintiffs filed their Motion to Strike on an order
4 shortening time, which was filed on June 18, 2008. Before the court even set Plaintiffs motion on
5 an order shortening time, Mr. Clary filed Kokoweef, Inc.'s Opposition to Plaintiffs Motion to Strike
6 and a motion for order shortening time. Mr. Clary's motion for an OST was attached as an exhibit
7 to that motion. It was Plaintiffs' understanding that the motion on an OST was for the subject
8 motion and not for an evidentiary hearing. Plaintiffs then filed a Renewed Motion to Strike because
9 the paralegal preparing the Motion to Strike believed that Mr. Beller would not be leaving town until
10 June 29, 2008. Once it was determined that this Court had set an evidentiary hearing for Friday, June
11 27, 2008, it has become necessary for Plaintiffs to file a Motion to Continue the Hearing.

12 Plaintiffs request that their Motion to Continue be heard on June 26, 2008 at the time set for
13 the hearing of Plaintiffs' Renewed Motion to Strike Renewed Motion to Require Security from
14 Plaintiffs for the reason that their counsel, Neil J. Beller, Esq. will be continuing a bifurcated AAA
15 Arbitration beginning on Sunday, June 22, 2008 and ongoing through Wednesday, June 25th before
16 a three judge arbitration panel involving extensive and significant legal issues. Mr. Beller is
17 available on Thursday, June 26, 2008. It is necessary for Mr. Beller to leave his residence by 1:30
18 p.m. on Friday, June 27, 2008 to catch a 4:00 p.m. plane for his out of the country trip. Although
19 he could be available for court on June 27th, he could only be present until 12:30 p.m. and would
20 then have to leave immediately.

21 If the hearing on the 27th were only for the motion to require security from plaintiffs, then,
22 Mr. Beller would be able to attend; but because Mr. Clary, requested an evidentiary hearing on an
23 order shortening time, and Plaintiffs' anticipate the hearing will take considerably longer than two
24 hours, Mr. Beller could only be available until 12:30 p.m. Additionally, due to the Arbitration
25 beginning Sunday and continuing through Wednesday, June 25th, Mr. Beller's time is limited in
26 which to prepare for a proper presentation at an evidentiary hearing. Because, out of necessity that
27 Mr. Beller must leave by 12:30 p.m., he would not be able to be present should the hearing run
28 beyond 12:30 p.m. If this Court does not grant Plaintiffs' Motion to Continue, Larry Smith, Esq. of

1 Benson & Bertoldo will be present with Mr. Beller at the hearing on June 27th, but he has not
2 previously been involved in this matter, and it would be an injustice to Plaintiffs to have another
3 attorney not completely familiar with the matter continue with the hearing.

4 Plaintiffs request the evidentiary hearing be continued until a date after July 16, 2008.

5 **III. CONCLUSION**

6 Based on the foregoing, Plaintiffs respectfully request their MOTION TO CONTINUE
7 EVIDENTIARY HEARING ON DEFENDANT'S RENEWED MOTION TO REQUIRE
8 SECURITY FROM PLAINTIFFS be granted.

9 DATED this 2nd day of June 2008.

10 NEIL J. BELLER, LTD.

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13 By:  #7301 for

14 NEIL J. BELLER, ESQ.
15 Nevada Bar No. 2360
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19 Attorney for Plaintiffs
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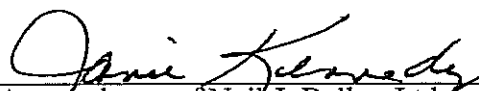
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23 day of June, 2008, service of the foregoing
**PLAINTIFFS' REPLY TO DEFENDANT KOKOWEEF, INC.'S OPPOSITION TO
PLAINTIFFS' RENEWED MOTION TO STRIKE RENEWED MOTION TO REQUIRE
SECURITY FROM PLAINTIFFS AND OPPOSITION TO MOTION FOR SANCTIONS**
was made this date by serving via facsimile a true copy of the same addressed as follows:

M. Nelson Segel, Chartered
M. Nelson Segel, Esq., NBN 000530
624 South 9th Street
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Attorneys for Defendant Larry Hahn and Hahn's World of Surplus, Inc.
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CLARY CANNON, LLP
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An employee of Neil J. Beller, Ltd.