

CLERK OF THE COURT

1 NOTC
ALEXANDER ROBERTSON, IV
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6 Attorneys for Plaintiffs
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8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

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11 TED R. BURKE; MICHAEL R. and) CASE NO. A558629
LAURETTA L. KEHOE; JOHN BERTOLDO;) Dept. XIII
12 PAUL BARNARD; EDDY KRAVETZ;)
JACKIE and FRED KRAVETZ; STEVE)
13 FRANKS; PAULA MARIA BARNARD;)
LEON GOLDEN; C.A. MURFF; GERDA) REQUEST FOR RULE 16 CONFERENCE
14 FERN BILLBE; BOB and ROBYN TRESKA;)
MICHAEL RANDOLPH; and FREDERICK)
15 WILLIS,)

16 Plaintiffs,

17 vs.

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

22 Defendants,

23 and

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

26 Nominal Defendants.
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ROBERTSON
& VICK, LLP

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1 COME NOW Plaintiffs by and through their attorneys ALEXANDER ROBERTSON and
2 JENNIFER TAYLOR of ROBERTSON & VICK, LLP, and request that this Court to set a
3 Conference pursuant to NRCPC Rule 16.

4 1. NRCPC Rule 16 provides in pertinent part as follows:

5 (a) Pretrial Conferences; Objectives. In any action, the court may in its discretion
6 direct the attorneys for the parties and any unrepresented parties to appear before
7 it for a conference or conferences before trial for such purposes as:

8 (1) Expediting the disposition of the action;

9 (2) Establishing early and continuing control so that the case will
10 not be protracted because of lack of management;

11 (3) Discouraging wasteful pretrial activities;

12 (4) Improving the quality of the trial through more thorough
13 preparation; and

14 (5) Facilitating the settlement of the case.

15 2. That at the hearing on October 29, 2009, this Court discussed setting a renewed
16 Rule 16 Conference, but deferred scheduling same based on Defendant Larry Hahn and Hahn's
17 World of Surplus, Inc.'s counsel, M. Nelson Segel's assertions that he would be filing a Motion
18 for Partial Summary Judgment. The Court decided to hold the conference after the motion was
19 filed.

20 3. That to date, Defendant's Motion for Partial Summary Judgment has not been
21 filed. Mr. Segel stated his intent to file his motion since July of 2009, but has yet failed to do so.
22 Yet, Mr. Segel has been arguing and relying on this impending motion as a basis for delay of
23 discovery deadlines, settlement conference and a renewed Rule 16 Conference.

24 4. That Defendants have had over seven months to file their motion and have failed
25 to do so.

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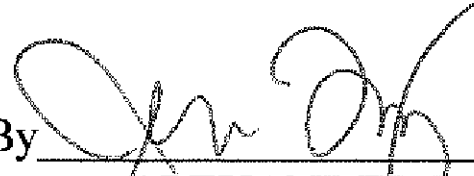
ROBERTSON
& VICK, LLP

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WHEREFORE, Plaintiffs request that this Court set a Rule 16 Conference for a date and time certain

Dated: February 5, 2010

ROBERTSON & VICK, LLP

By 
ALEXANDER ROBERTSON, IV
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Attorneys for PLAINTIFFS

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2010, I served a copy of the above and foregoing **REQUEST FOR RULE 16 CONFERENCE** by depositing a copy thereof for mailing at Las Vegas, Nevada, postage prepaid, addressed to:

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M. Nelson Segel, Esq.
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Monica Metoyer