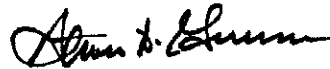


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OPPS
ALEXANDER ROBERTSON, IV
State Bar No. 8642
JENNIFER L. TAYLOR
State Bar No. 5798
ROBERTSON & VICK, LLP
401 N. Buffalo Dr., Suite 202
Las Vegas, Nevada 89145
Telephone: (702) 247-4661
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Attorneys for Plaintiffs

DISTRICT COURT
CLARK COUNTY, NEVADA

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

Plaintiffs,

vs.

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

Defendants,

and

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

Nominal Defendants.

CASE NO. A558629
DEPT: XI

PLAINTIFFS' OPPOSITION TO
KOKOWEEF'S MOTION TO COMPEL
AND COUNTERMOTION FOR
SANCTIONS

1 Plaintiffs Ted R. Burke; Michael R. And Lauretta L. Kehoe; John Bertoldo; Paul Barnard;
2 Eddy Kravetz; Jackie and Fred Kravetz; Steven Franks; Paula Maria Barnard; Leon Golden; C.A.
3 Murff; Gerda Fern Billbe; Bob and Robyn Treska; Michael Randolph and Frederick Willis
4 (hereinafter collectively referred to as "Plaintiffs"), by and through their undersigned counsel of
5 record, Robertson & Vick LLP, hereby file their Opposition to Defendants KOKOWEEF and
6 PATRICK C. CLARY's Motion to Compel (hereafter collectively "Defendants"); and file their
7 Countermotion for Sanctions based upon Defendants' Failure to comply with this Court's Order
8 on Plaintiffs' Motion to Compel heard on March 30, 2010.

9 This Opposition and Countermotion are based upon the points and authorities set forth
10 herein, the pleadings and papers on file herein, the exhibits attached hereto, and any oral
11 argument requested of counsel.

12 DATED this 26thth day of May, 2010.

13
14 ROBERTSON & VICK, LLP

15
16 By: 

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

17
18
19
20 *Attorneys for Plaintiffs*

21
22 **MEMORANDUM OF POINTS AND AUTHORITIES:**

23 **I. INTRODUCTION:**

24 Defendants' Motion to Compel lacks anything other than the assertions of their counsel
25 that their discovery is proper. There is no case law supporting the assertions and the
26 affidavit/declaration of its counsel fails to provide any additional support to compel the responses
27 of Plaintiffs. Additionally, Defendants' request for hearing this matter on an Order Shortening
28

ROBERTSON
& VICK, LLP

1 Time does not comport with the rules governing the shortening of time and demonstrates
2 Defendants' continued bad faith in this litigation.

3 **II. STATEMENT OF FACTS**

4 **A. Procedural History and Statement of Facts:**

5 On May 21, 2010, counsel for Plaintiff met and conferred with counsel for Kokoweef on
6 a number of items, including Plaintiffs' Responses to Defendants' overbroad, compound, and
7 unintelligible interrogatories and requests for production. Counsel for Plaintiff agreed to answer
8 certain interrogatories, but, as permitted under the Nevada Rules of Civil Procedure, maintained
9 certain objections. Further, counsel for Plaintiff agreed to respond to additional Interrogatories if
10 they were reworded. Counsel for Defendants refused to reword his Interrogatories.

11 At 4:10 p.m. yesterday afternoon, May 25, 2010, while counsel for Plaintiff was on a
12 conference call with another client, counsel for Defendant hand-delivered the instant Motion to
13 Compel. Additionally, today, another hand-delivery was made at 10:30 a.m. containing
14 Defendants' so-called Status Report to the Court Regarding Discovery. The Affidavits in
15 support of the Motion to Compel and the Status Report contain the predictable disparagement of
16 counsel for Plaintiff that has characterized the Defendants' consistent approach to this litigation.
17 This barrage of belittling commentary comes not only from counsel for Kokoweef but counsel
18 for the Hahn defendants as well. See Exhibit 1, correspondence from M. Nelson Segel and the
19 response of Alex Robertson thereto.

20 21 **III. LEGAL AUTHORITY:**

22 **A. STANDARD FOR THRESHHOLD DETERMINATION ON MOTIONS**

23 EDCR 2.20(f) states that: "A memorandum of points and authorities which consists of
24 bare citations to statutes, rules, or case authority does not comply with this rule and the court may
25 decline to consider it." Defendants' Motion contains no supporting points and authorities to
26 support their claim that Plaintiffs should be compelled to respond to their compound and
27 overbroad interrogatories.

28 ///

1 **B. DEFENDANTS DISCOVERY IS OUTSIDE THE BOUNDS OF NRCP 26**

2 NRCP 33 governs interrogatories and states:

3 (a) Availability. Without leave of court or written stipulation,
4 any party may serve upon any other party written
5 interrogatories, not exceeding 40 in number including all
6 discrete subparts, to be answered by the party served or, if
7 the party served is a public or private corporation or a
8 partnership or association or governmental agency, by any
officer or agent, who shall furnish such information as is
available to the party. Leave to serve additional
interrogatories shall be granted to the extent consistent with
the principles of Rule 26(b)(2).

9 (b) Answers and Objections:

10

11 (2) The answers are to be signed by the person making them, and the objections
signed by the attorney making them.

12 Case law interpreting this Rule clearly indicates that Defendants' Interrogatories are
13 objectionable because they are overbroad, compound, unintelligible and have the potential to
14 subject the party responding to undue harassment. While the Nevada Supreme Court has not
15 weighed in extensively on discovery disputes, the drafters of the 2004 Amendment to NRCP 33
16 noted: "The rule is amended to conform to the federal rule, except the limit on the number of
17 interrogatories." Therefore, the drafters intended litigants in Nevada to be able to rely upon
18 federal law and cases.

19 **1. Defendants' Interrogatories Nos. 7-9, and 14-26 are overbroad and Plaintiffs**
20 **should not be compelled to respond.**

21 This span of Interrogatories all improperly seek a blanket narrative account of the case,
22 which has been deemed by the federal courts as "too broad" for discovery purposes. See United
23 States v. Renault, Inc., 27 F.R.D. 23 (S.D. NY 1960) (sustaining objections to interrogatories
24 which sought extremely comprehensive outlines of legal theories); Greene v. Raymond, 41
25 F.R.D. 11, 14 (D. Colo. 1966) ("Even more frequently, interrogatories too indefinite or
26 all-inclusive have been struck down" as being irrelevant) (citing, Wedding v. Tallant Transfer
27 Co., 37 F.R.D. 8 (D. Ohio 1963), Stovall v. Gulf & South Am. S. S. Co., 30 F.R.D. 152 (D. Tex.
28 1961); Webster Motor Car Co. v. Packard Motor Car Co., 16 F.R.D. 350 (D. D.C. 1955). See

1 also Fisherman & Merchants Bank v. Burin, 11 F.R.D. 142, 143-44 (D. Cal. 1951) (concluding
2 that a party should not have to prepare, in advance of a trial, a complete summary of the evidence
3 which will be presented at the trial of the action on the merits).

4 **2. The majority of Defendants' Interrogatories are compound and result in**
5 **Interrogatories exceeding the number permitted under NRCP 33.**

6 Throughout Defendants' Interrogatories, Defendants are seeking responses on discrete
7 subparts to their Interrogatories. While Defendants can serve compound interrogatories, they
8 cannot do so as a means to circumvent the forty number limit in NRCP 33. See e.g., Banks v.
9 Office of Senate Sergeant-at-Arms, 222 F.R.D. 7 (D.D.C. 2004)) (compound questions
10 demanding documents, and raising topics: of employee's evaluations, employee's loss of certain
11 duties because of them, and what information was provided to the evaluators and from whom did
12 it come would be counted as four interrogatories for purposes of numerical restriction on
13 interrogatories).

14 Accordingly, Plaintiff should not be required to respond to the Interrogatories, as
15 numbered by Defendants because with the compound interrogatories, those numbers exceed the
16 forty interrogatories permitted by NRCP 33.

17 **3. Defendants' Interrogatory Nos. 28-30 are irrelevant and will result in harassment**
18 **of Plaintiffs.**

19 The Interrogatories numbered 28-30 by Defendants are, pursuant to NRCP 26 being
20 issued solely to harass Plaintiffs. Witness testimony and documents issued to other shareholders
21 by counsel for Defendants confirm that the sole purpose of this discovery is to harass Plaintiffs.

22 Counsel for Plaintiff met with Ralph Lewis. Mr. Lewis played a voice mail left on his
23 cellular phone from Mr. Hahn that threatened any shareholder helping Plaintiffs "wouldn't see a
24 dime". See Affidavit of Jennifer L. Taylor attached hereto. Clearly, Defendants' sole intent in
25 seeking this information is to provide a further list of shareholders to threaten them with
26 stripping of their rights. Such a clear threats mean that this interrogatory falls outside of
27 permissible discovery under NRCP 26, and Plaintiffs should be precluded from needing to
28 respond. See Bachman v. Collier, 23 F.R. Serv 2d 1461 (Dist. Col 1977) (preventing

1 Defendants, through a protective order, from interrogatories to unnamed class action plaintiffs,
2 which represented outrageous and needless invasion of privacy and revealed on their face
3 calculated effort to harass and discourage class members).

4 Defendants' actions, even at the outset of this litigation, evidence their intent to harass
5 and harm any dissenting shareholders. Specifically, on or about April 2008, the Plaintiffs in this
6 action who had been board members were all removed from the board. Additionally, during the
7 July 2008 evidentiary hearing, Larry Hahn testified that any shares issued to the Plaintiffs based
8 upon work performed, had been rescinded.

9
10 **4. Defendants' Interrogatories and Requests for Production which seek responses**
11 **on claims that have been dismissed are overly broad and irrelevant, and intended**
12 **only to harass Plaintiffs.**

13 NRCP 26 permits discovery regarding any matter . . . which is relevant to the subject
14 matter involved in the pending action. However, on January 29, 2009, Judge Denton issued an
15 Order which dismissed the following numbered causes of action: 1, 2, 3, 5, and 6. Yet,
16 Defendants seek information and documents related to these causes of action. Clearly, these fall
17 outside the parameters of NRCP 26 and Plaintiffs should not be compelled to answer them.

18 IV. CONCLUSION

19 Based on the foregoing, Defendants' Motion to Compel should be Denied.

20 DATED this 26th day of May, 2010.

21 ROBERTSON & VICK, LLP

22
23 By: _____

ALEXANDER ROBERTSON, IV

Bar No. 8642

JENNIFER L. TAYLOR

Bar No. 5798

401 N. Buffalo Drive, Suite 202

Las Vegas, Nevada 89145

Attorneys for Plaintiffs

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ROBERTSON
& VICK, LLP

1 **PLAINTIFFS' COUNTER-MOTION FOR SANCTIONS FOR KOKOWEEF'S FAILURE**
2 **TO COMPLY WITH ORDER**

3 **MEMORANDUM OF POINTS AND AUTHORITIES:**

4 **I. INTRODUCTION:**

5 Despite being ordered to Respond to Plaintiffs' Requests for Production and to sign that
6 response, Defendants still have failed to do so, and continue to simply assert that Plaintiffs have
7 been provided all the documents, when it is clear that this is not the case. Further, it is clear that
8 absent continued court intervention and oversight, Defendants will not properly comply with the
9 Court's Order.

10 **II. STATEMENT OF FACTS**

11 **A. Procedural History and Statement of Facts:**

12 As previously set out in great detail in Plaintiffs' Motion to Compel Responses to
13 Requests for Production, filed in February 2010, on August 14, 2009, Plaintiffs personally served
14 a Notice of Deposition Pursuant to NRCP 30(b)(6) of the Custodian and Keeper of Records of
15 Kokoweef, Inc. (hereafter the "Deposition Notice"). Since that date, Plaintiffs have been
16 attempting, in vain and at great time and expense to obtain Response to those Requests. .

17 On March 30, 2010, the Court heard arguments on Plaintiffs' Motion, and ordered that
18 Defendant Kokoweef respond to the Requests for Production. A true and correct copy of the
19 transcript is attached hereto as Ex. "2". On April 22, 2010, an order reflecting the Court's ruling
20 was entered. A true and correct copy of that Order is attached hereto as Ex. "3 ". The Order
21 stated that Kokoweef was to provide Plaintiffs with a "formal written response" pursuant to
22 NRCP 34 to the Request for Production of Documents no later than April 14, 2010.

23 On April 14, 2010, just before close of business, Defendant Kokoweef served upon
24 Plaintiffs its Response to Request for Production of Documents, a true and correct copy of which
25 is attached hereto as Ex. "4" and is hereafter referred to as "the Responses". The Responses
26 included an index allegedly identifying documents responsive to each request. It further included
27 a disk, identified as the "New Disk", which had additional unbates-stamped documents.
28

1 Pursuant to the Court's Order, the deposition of the Custodian of Records for Kokoweef
2 had been scheduled for April 30, 2010. In order to prepare for that deposition, Plaintiffs
3 reviewed Kokoweef's Responses in conjunction with bates-stamped disks that had been
4 produced (although never with any type of signed pleading by Kokoweef's counsel) and
5 attempted to identify which documents on those disks matched the index attached to the
6 Responses. The result of this analysis was that, again, most of the documents identified in the
7 index to the Responses did not exist on any of the disks, and Plaintiffs would have gone into the
8 deposition of Kokoweef's Custodian of Records with an incomplete and inaccurate set of
9 documents. See Affidavits of Monica L. Metoyer and Jennifer L. Taylor attached hereto.

10 Further, on April 28, 2010, at 6:23pm, counsel for Kokoweef emailed a letter which
11 stated:

12 "In preparing for the deposition on Friday, it occurred to me that,
13 while we have provided the corporate documents of Kokoweef,
14 Inc. on numerous occasions, because I do not recall the last date
15 that any corporate documents were produced, there may be some
16 minutes of corporate meetings that you do not have. Accordingly,
if you will provide me early tomorrow with a list of the minutes
that you do have assembled, I will provide you copies of the
minutes that you apparently do not have immediately after receiving
your list."

17 A true and correct copy of the email and correspondence from April 28, 2010 are attached hereto
18 as Exhibit "5". Attached hereto as Exhibit "6" is correspondence to Mr. Clary in response to
19 Exhibit "5".

20 On April 29, 2010, at 4:17 p.m., Kokoweef served Supplemental Response to So-Called
21 Nominal Defendant Kokoweef, Inc.'s Response to Documents Contained in Plaintiff's Notice of
22 Deposition Pursuant to NRCP 30(b)(6) of the Custodian and Keeper of Records of Kokoweef,
23 Inc. (the "Supplemental Response"), a true and correct copy of which (without the two-inch
24 unbates-stamped documents) is attached hereto as Ex. "7". These Supplemental Responses
25 clearly indicated that Kokoweef had not responded to Plaintiffs' Request for Production as
26 required by the Order and NRCP 34. See also Exhibit "8", correspondence to Patrick Clary
27 regarding the Supplemental Responses. Specifically, in the Supplemental Response to Request
28 No. 15, Kokoweef wrote: "Although voluminous corporate documents were previously

1 produced” by Kokoweef, but failed to indicate when such documents had been produced in the
2 litigation. Further, a review of Kokoweef’s sole NRCP 16.1 disclosure, a true and correct copy
3 of which is attached hereto as Ex. “9”, indicated no such disclosures, and the index to the
4 Responses, similarly disclosed no such responses.

5 The Supplemental Response to Request No. 24 was equally troubling and demonstrated
6 that Kokoweef had not properly responded to Plaintiffs requests as Ordered by the Court and as
7 required by NRCP 34. The Supplemental Response to Request No. 24 stated: “While all such
8 documents were produced at Kokoweef’s office . . . and scanned there . . . except for the
9 stockholders’ file for Peter and Lisa Freeman, which was inadvertently located in the
10 undersigned counsel’s office and just discovered . . . “

11 Despite the continued late production of documents by Kokoweef in violation of the
12 Court’s Order on the Motion to Compel, Plaintiffs were preparing for the Custodian of Records
13 Deposition scheduled for April 30, 2010. However, after hours of review by Plaintiffs’ counsel
14 and paralegal, it was clear that Kokoweef’s Responses were deficient, evasive and incomplete,
15 and that going forward with the April 30, 2010 deposition of the Custodian of Records a waste
16 of time and money. Accordingly, Plaintiffs sent correspondence to counsel for Kokoweef
17 outlining the extensive deficiencies in their Responses and requesting immediate compliance
18 with the Order and NRCP 34. A true and correct copy of this correspondence is attached hereto
19 as Ex. “10”.

20 In response, on May 7, 2010, counsel for Kokoweef sent correspondence indicating that
21 there was no deficiency in its production and listing only a few documents that would be
22 supplemented. A true and correct copy of this correspondence is attached hereto as Ex. “11”.
23 Counsel for Kokweef also identified numerous documents that were not produced because, he
24 believed, they had not been requested, despite the fact that they fell within the purview of
25 Plaintiffs’ Requests. What was clear from this correspondence was that Kokoweef continued to
26 insist that documents produced, without authentication or numbered identification, and prior to
27 the litigation was sufficient to fulfill its obligations under the Order. Yet, the letter failed to

1 provide any identification of the dates that these so-called "voluminous documents" were
2 produced, or any other identification that would be responsive to the Order or under NRCP 34.

3
4 **III. LEGAL AUTHORITY:**

5
6 **A. STANDARD FOR THRESHOLD DETERMINATION ON MOTIONS FOR**
7 **SANCTIONS**

8 NRCP 37, governs the failure to make disclosure or cooperate in discovery and
9 the imposition of sanctions, and in pertinent part state:

10 (3) Evasive or Incomplete Disclosure, Answer or Response. For purposes of this
11 subdivision an evasive or incomplete disclosure, answer or response is to be treated as a
12 failure to disclose, answer or respond.

13 (4) Expenses and Sanctions.

14 (A) If the motion is granted or if the disclosure or requested discovery is provided
15 after the motion was filed, the court shall, after affording an opportunity to be
16 heard, require the party or deponent whose conduct necessitated the motion or the
17 party or attorney advising such conduct or both of them to pay to the moving party
18 the reasonable expenses incurred in making the motion, including attorney's fees,
19 unless the court finds that the motion was filed without the movant's first making
20 a good faith effort to obtain the disclosure or discovery without court action, or
21 that the opposing party's nondisclosure, response or objection was substantially
22 justified, or that other circumstances make an award of expenses unjust.

23

24 (C) If the motion is granted in part and denied in part, the court may enter any
25 protective order authorized under Rule 26(c) and may, after affording an opportunity to be heard,
26 apportion the reasonable expenses incurred in relation to the motion among the parties and
27 persons in a just manner.

28 (c) Failure to Disclose; False or Misleading Disclosure; Refusal to Admit.

1 (1) A party that without substantial justification fails to disclose information required by
2 Rule 16.1, 16.2, or 26(e)(1), or to amend a prior response to discovery as required by Rule
3 26(e)(2), is not, unless such failure is harmless, permitted to use as evidence at a trial, at a
4 hearing, or on a motion any witness or information not so disclosed. In addition to or in lieu of
5 this sanction, the court, on motion and after affording an opportunity to be heard, may impose
6 other appropriate sanctions. In addition to requiring payment of reasonable expenses, including
7 attorney's fees, caused by the failure, these sanctions may include any of the actions authorized
8 under Rule 37(b)(2)(A), (B), and (C) and may include informing the jury of the failure to make
9 the disclosure.

10
11 **B. DEFENDANTS CANNOT CONTINUE TO REFER TO AND RELY UPON**
12 **DOCUMENTS THAT ARE OUTSIDE THOSE PRODUCED PURSUANT TO THE RULES**
OF CIVIL PROCEDURE

13 NRCP 16.1 and 26 require that documents intended to be used in the litigation be
14 produced in conjunction with the Rules of Civil Procedure. Specifically, NRCP 16.1(b)(1)
15 requires that counsel exchange documents intended to be used in "support of the allegations or
16 denials of the pleading filed by that party". Additionally, NRCP 26 requires supplementation of
17 prior disclosures. NRCP 26 (e)(1). Defendants' continued refrain that they have, at unknown
18 times, produced, "voluminous records" means nothing if those documents are not provided
19 pursuant to NRCP 16.1, 26 and/or 34.

20 In this case, this continued refrain is particularly problematic because of the mercurial
21 nature of the documents provided to Plaintiffs pre-litigation. Plaintiffs need to have Kokoweef's
22 so-called "voluminous documents" produced in a form that includes the signature or certification
23 of an attorney or Kokoweef representative in order to have confirmation that documents being
24 produced constitute the entire breadth of documents responsive to Plaintiffs' Requests for
25 Production. Without some level of definition in Kokoweef's production of documents, Plaintiffs
26 and their experts cannot reasonably be expected to rely upon these fugitive documents.

27 Additionally, the vague and kafka-esque responses of Defendants provides no further
28 guidance as to the documents that are intended to be responsive to each request. See Ex 4.

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IV. CONCLUSION

Based on the foregoing, Plaintiffs' request that the Court order Kokoweef immediately and completely supplement its evasive and incomplete responses to Plaintiffs' Requests for Production and order sanctions in the form of attorneys fees as a result of Plaintiffs' having to bring this further Motion.

DATED this 26th day of May, 2010.

ROBERTSON & VICK, LLP

By: _____

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

Attorneys for Plaintiffs

1 **DECLARATION OF JENNIFER L. TAYLOR, ESQ.**
2 **IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL AND IN SUPPORT OF**
3 **MOTION FOR SANCTIONS**

4 JENNIFER L. TAYLOR, ESQ., states:

5 1. that she is an attorney licensed to practice in all courts in the State of Nevada, that
6 she is counsel for Plaintiffs that she has personal knowledge of the facts stated herein, except for
7 those stated and made upon information and belief, wherein so indicated.

8 2. I make this Declaration on behalf of Plaintiffs and in support of their Opposition
9 to Defendants' Motion to Compel (hereafter the "Motion") filed by Defendants Kokoweef, Inc.
10 and Patrick C. Clary (hereafter "Defendants") and in support of Plaintiffs' Motion for Sanctions.

11 3. The conversations that have been held with both the defense counsel have been
12 numerous, extensive and not accurately represented by either of them. Following are relevant
13 portions of the recent conversations to give the Court additional background that is not solely
14 excerpted by Defendants' counsel for their own benefit.

15 4. On April 14, 2010 Plaintiffs received Defendants' so-called Responses to
16 Plaintiffs' Requests for Production. In preparation for the Custodian of Records Deposition
17 ordered by this Court, my paralegal and I reviewed the index and several discs of documents
18 provided to our office throughout this litigation. However, none of these disks have ever been
19 authenticated or produced pursuant to NRCP 16. 1 or NRCP 34. Additionally, most of the
20 documents allegedly produced, as set out in the Kokoweef Index of Documents, have not been
21 located in Kokoweef's production. See Affidavit of Monica Metoyer included along with this
22 pleading.

23 5. On May 21, 2010, I held a meet and confer with counsel for Kokoweef regarding
24 Plaintiffs' responses to Defendants' discovery and Kokoweef's responses to Plaintiffs' Requests
25 for Production. Counsel for Kokoweef conducted the meet and confer on his discovery in the
26 following manner. He would go to each interrogatory and ask for a "yes or no" response as to
27 whether I would be answering each. After going through this on a few Interrogatories, I told him
28 that I wanted to hear why it was that he felt his Interrogatories were not subject to any objections.
While he didn't want to have this discussion, he eventually went through each interrogatory and

1 stated that there was nothing wrong with any of them. Further, as has happened in the past in our
2 discussions, he informed me that, because he'd been practicing for decades longer than I had
3 been practicing, he had drafted thousands of interrogatories and knew if one was objectionable
4 or not.

5 6. While Mr. Clary did not swear at me in this conversation, as he has on many other
6 occasions, I told him that I was weary of him, and his co-defense counsel, making every effort in
7 pleadings and letters to make me look inexperienced and stupid, to disparage the type of law I
8 practice, and to engage in other bullying tactics. Mr. Clary's response was "have you ever been
9 sued", which I took to mean that his behavior was predicated on the fact that he was a named
10 defendant in this litigation. I said to him, as I've said to both him and his co-defense counsel on
11 other occasions, that if he was too emotionally invested to represent himself in this litigation, he
12 should hire an attorney to represent him so that the litigation could proceed with greater civility.
13 Mr. Clary posed the following questions to me: What if I can't afford one? Are you going to pay
14 for one?

15 7. Defendants continue their tactic of sandbagging Plaintiffs' counsel. Defendants'
16 Motion to Compel was delivered to our office after 4:00pm yesterday. Counsel for Defendants
17 signed the Motion of May 21, 2010, and could have served Plaintiffs' counsel with a courtesy
18 copy. However, he, instead, waited until one hour before close of business yesterday.
19 Additionally, today, at 10:30am, a representative from Mr. Clary's office hand-delivered a
20 unilaterally prepared "Status Report" to the Court. As further indication of the lack of
21 professionalism demonstrated by Mr. Clary's office, his representative simply walked into our
22 back offices and directly into my paralegal's office without seeking to announce themselves at
23 our receptionist's desk.

24 8. I believe that several of the Interrogatories will be used to continue to harass my
25 clients and shareholders who support their efforts. On June 20, 2009, I met Ralph Lewis at our
26 offices. Mr. Lewis and I discussed his background and history with Kokoweef. He told me that
27 he had been doing work either researching the mine or physically working at the mine since
28 1979. This work included the annual filings on the mining claims assessments. In early 2009,

1 Mr. Lewis was aware of the litigation, but had been trying to be "neutral" in the dispute.
2 However, he was asked by shareholder, Richard Dutchik, to allow a link to his series of articles
3 and memos about the Kokoweef legend's history to be placed on the home page of the
4 Kokoweef.com website. As a result of permitting this link, on February 3, 2009, Defendant
5 Larry Hahn left a message for Mr. Lewis on his cellular phone voice mail. On June 20, 2009,
6 Mr. Lewis played this voice mail for me. Mr. Lewis had saved this voicemail and intended to
7 save this voicemail. However, about a month ago, Mr. Lewis' cell phone provider had a system
8 wide error that deleted all saved voicemails. I attempted to obtain an affidavit from Mr. Lewis to
9 include with this Opposition and Countermotion. However, given that only one judicial day was
10 available to provide a pleading and Mr. Lewis is travelling today, he was unable to do so. Mr.
11 Lewis, is, however, available to provide testimony on the same, and will specifically testify that
12 Mr. Hahn's message stated that "Anyone who is with that [Kokoweef.com] website won't see a
13 dime out of this - even if I have to keep them in court forever."

14 I declare under the penalty of perjury that the foregoing is true and correct.

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18 JENNIFER L. TAYLOR
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**DECLARATION OF MONICA METOYÉR IN SUPPORT OF
OPPOSITION TO MOTION TO COMPEL AND IN
SUPPORT OF MOTION FOR SANCTIONS**

I, Monica Metoyér, state as follows:

1. I am a paralegal with Robertson & Vick, LLP, attorneys of record for Plaintiffs herein. The facts stated herein are based upon my own personal knowledge and if called to testify I could and would competently do so under oath.

2. On April 27, 2010, I began assisting with the preparation for the deposition of the Custodian of Records of Kokoweef.

3. I began the preparation by reviewing disks containing documents and records produced by Kokoweef and the Kokoweef Directory of Documents Produced. I cross-referenced both the documents and records on the disks and hard copies of documents produced to our office with the Kokoweef Directory of Documents Produced.

4. As I identified documents that were produced to our office on disk, I made a notation on the Kokoweef Directory of Documents Produced in the order that they were located. I then double-checked the hard copies of documents and noted those documents with a checkmark on the Kokoweef Directory of Documents Produced. I found that only a small percentage of the documents produced to our office were listed on the Kokoweef Directory of Documents Produced. Attached as Exhibit "12" is a true and correct copy of the Kokoweef Directory of Documents produced with my notations.

5. I spent approximately 7 hours reviewing the documents on the disks, the hard copies of the documents produced by Kokoweef and cross-referencing the documents with the Kokoweef Directory of Documents Produced.

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

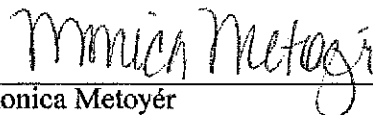

Monica Metoyér

Exhibit 1

LAW OFFICE OF
M NELSON SEGEL, ESQUIRE
624 SOUTH 9TH STREET
LAS VEGAS, NEVADA 89101
TELEPHONE (702) 385-5266
FAX (702) 382-2967
EMAIL: nelson@nelsonsegellaw.com

April 30, 2010

VIA EMAIL

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

Re: ***HAHN ET AL. ADV BURKE ET AL.***

Dear Ms. Taylor:

We are in receipt of your various emails and letters regarding the purported deficiencies in the production by Kokoweef, Inc. Without commenting on the contents of said letters, or acknowledging that Kokoweef did not properly respond, it is Kokoweef, not my clients, who were responsible for the production. I appreciate your keeping me in the loop and I believe it is appropriate.

I will make one observation. It appears that your requests are overbroad and burdensome. Had I responded, there would have been multiple objections. It is my belief that Kokoweef attempted to respond to requests.

I allowed you unfettered access to the "inner office" of Kokoweef. If you recall, our original agreement was to limit you to the "outer office." You were allowed to literally make a diagram of the entire "inner office." This should make it clear that Kokoweef had a desire to open and allow unfettered access.

Your background in CD cases makes it clear that you have a desire to go on a "fishing expedition" and to cause such expense to the defendants to bury them. You have essentially sought every piece of paper that was generated by Kokoweef or its predecessor EIN from their inception. That is likely to happen! However, this will not be a positive result for your clients.

Numerous times, I have requested a settlement offer, what your clients wanted, or at minimum, a computation of any category of damages claimed by your clients. No such information has ever been provided to us. After the hearing on your discovery motion, I contacted Mr. Robertson and you. I asked what your clients wanted. Mr. Robertson stated, "I am not authorized to tell you!"

While we were at the Kokoweef offices, I believe on Monday, April 19, 2010, I asked you what your clients wanted." You stated, in an agitated voice, that I had asked you this numerous times, you had many matters

Jennifer Taylor, Esquire
April 30, 2010
Page Two

with which you had to deal and you could not address it.

I am also not happy with your unilateral termination of the deposition that was scheduled twice and ordered by Judge Gonzalez to take place. It is clear that your clients do not have a desire to resolve this matter or to assist Kokoweef in ridding itself of an officer who allegedly acted improperly. Your clients' goals are to kill Kokoweef!

This letter shall serve as a formal demand for the immediate disclosure of your client's damages. Since you have set a deadline for performance by Kokoweef of May 10, 2010, we will use said date for your responses. It is the desire of my clients to end this litigation. It is clear that the Plaintiffs prefer to prolong it and avoid the true issues.

I look forward to hearing from you.

With great concern,

\s\ M Nelson Segel

M Nelson Segel

MNS:dlw

cc: Mr. Larry Hahn
Patrick C. Clary, Esquire

Robertson & Vick LLP

Attorneys at Law

880 Hampshire Road, Suite B
Westlake Village, California 91361
Telephone (805) 418-9900 • Fax (805) 418-9901
website: www.rvcdlaw.com

May 5, 2010

VIA FACSIMILE AND U.S. MAIL

M. Nelson Segel, Esq.
M. NELSON SEGEL, CHARTERED
624 South 9th Street
Las Vegas, NV 89101

Re: BURKE, et al. V. HAHN, et al.
Our File No.: 5081.0001

Dear Mr. Segel:

Your letter to Ms. Taylor, dated April 30, 2010, makes it clear that you have become emotionally invested in this case and lack objectivity. The first paragraph of your letter clarifies that you do not represent the corporation Kokoweef and are therefore not responsible for the deficiencies we contend exist with Kokoweef's production of documents. You then, however, spent the rest of your letter justifying Kokoweef's responses and suggest objections you would have raised had you prepared the responses on behalf of Kokoweef. The balance of your letter contains nothing more than enmity and vitriol against my firm and my clients.

Further, your attempt to mischaracterize our conversation concerning your request for a settlement demand is not only a mischaracterization of what I said but reveals the collective desperation of you and your client to terminate this litigation without having to produce the evidence long sought by our clients.

LOS ANGELES

LAS VEGAS

ALBUQUERQUE

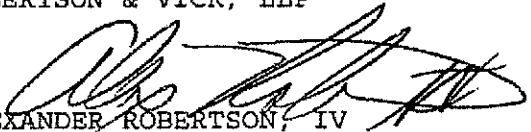
M. Nelson Segel, Esq.
May 5, 2010
Page 2

Contrary to your ascertain, our clients' goal is not to "kill Kokoweef!", but rather to reveal the massive fraud that your client has perpetrated on all shareholders. While this goal may be uncomfortable and frightening to your client, I request that you comport yourself with the degree of professionalism required as an officer of the court and that you refrain from any further diatribes against my firm, its attorneys and our clients. Reasonable minds are free to differ on the interpretation of the evidence, but it is counter productive to attach yourself to the emotions of your client.

Your unilaterally imposed "deadline" for our clients to disclose their damages is amusing and indicative of your failure to comprehend the nature and extent of this lawsuit. Simply put, our clients cannot calculate their damages unless and until Kokoweef fully complies with the court's order and produces all of its corporate records. Only then can our experts analyze this evidence and opine as to the amount of corporate waste and self-dealing committed by your client, as well as the precise nature of any securities violations that may have occurred. We will wait until this evidence has been produced and analyzed by our experts before giving you an imprecise calculation of our clients' damages.

Very truly yours,

ROBERTSON & VICK, LLP



ALEXANDER ROBERTSON, IV

ATR:amr
cc: All Counsel

M. Nelson Segel, Esq.

May 5, 2010

Page 3

bcc: All Clients

Jennifer L. Taylor, Esq.

Exhibit 2

ORIGINAL

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * * *

Alvin D. Schuman

CLERK OF THE COURT

9

TED BURKE, et al.	.	
Plaintiffs	.	CASE NO. A-558629
vs.	.	
LARRY HAHN, et al.	.	DEPT. NO. XI
Defendants	.	Transcript of
	.	Proceedings
	.	

BEFORE THE HONORABLE ELIZABETH GONZALEZ, DISTRICT COURT JUDGE

HEARING ON MOTION TO COMPEL

TUESDAY, MARCH 30, 2010

APPEARANCES:

FOR THE PLAINTIFFS: ALEXANDER ROBERTSON, IV, ESQ.
JENNIFER LANE TAYLOR, ESQ.

FOR THE DEFENDANTS: PATRICK C. CLARY, ESQ.
M. NELSON SEGEL, ESQ.

COURT RECORDER:	TRANSCRIPTION BY:
JILL HAWKINS	FLORENCE HOYT
District Court	Las Vegas, Nevada 89146

Proceedings recorded by audio-visual recording, transcript
produced by transcription service.

COPY

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * * *

TED BURKE, et al.	.	
	.	
Plaintiffs	.	CASE NO. A-558629
	.	
vs.	.	
	.	
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	.	
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APPEARANCES:

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COURT RECORDER:	TRANSCRIPTION BY:
JILL HAWKINS	FLORENCE HOYT
District Court	Las Vegas, Nevada 89146

Proceedings recorded by audio-visual recording, transcript
produced by transcription service.

1 LAS VEGAS, NEVADA, TUESDAY, MARCH 30, 2010, 9:09 A.M.
2 (Court was called to order)
3 MR. SEGEL: Good morning, Your Honor. I'm Nelson
4 Segel, counsel for defendants Larry Hahn.
5 THE COURT: Wait. We're going to start with Ms.
6 Taylor.
7 MR. SEGEL: I was waiting, Your Honor --
8 THE COURT: We start over there.
9 MR. SEGEL: -- but you wanted us to get moving. All
10 right.
11 THE COURT: Ms. Taylor, if you could identify
12 yourself and move across the room.
13 MS. TAYLOR: Yes, Your Honor. Good morning, Your
14 Honor. Jennifer Taylor on behalf of plaintiffs.
15 MR. ROBERTSON: 'Morning, Your Honor. Alex
16 Robertson on behalf of plaintiffs.
17 MR. SEGEL: M. Nelson Segel, counsel for Larry --
18 defendant Larry Hahn and Hahn's World of Surplus. And Mr.
19 Hahn is present, as well.
20 MR. CLARY: Patrick Clary, counsel for Kokoweef and
21 for myself.
22 THE COURT: Thank you.
23 Well, Mr. Segel?
24 MR. SEGEL: Your Honor, you want to do our motion
25 for summary judgment first, I guess.

1 THE COURT: I do.

2 MR. SEGEL: Okay.

3 MR. CLARY: Whose summary judgment, mine or his?

4 THE COURT: Well, I guess I don't want to really do
5 the summary judgment first. Let me do it a little
6 differently. I want to do the motion to compel first. And I
7 want you to tell me why I don't want to hear it. I don't
8 remember which of you said that I shouldn't hear it.

9 MR. SEGEL: That was -- Your Honor, it's not that we
10 don't want you to hear. I guess you're going to hear it no
11 matter what.

12 THE COURT: Absolutely.

13 MR. SEGEL: But the issue that we raised in our
14 opposition, and it was -- the motion to compel is against
15 Kokoweef. I know they keep talking about my client's
16 responsibilities at present, but it wasn't addressed to him.
17 Mr. Clary responded. He left for a cruise, unfortunately,
18 right when that was due, and so I did a little extra work
19 because I felt it was important.

20 The problem we have in this case, this discovery
21 motion is a perfect example, the plaintiffs do what they want
22 to do. They don't follow the rules of procedure, they don't
23 follow what the Court's telling them to do. And in this case
24 in discovery issues, and we had a Rule 16 conference with
25 Judge Denton, counsel specifically asked Judge Denton to take

1 over discovery. Judge Denton said, no.

2 Then we came before Your Honor on our motion to
3 transfer, and you enlightened us on why you wouldn't transfer
4 the case. And that's fine. And counsel again said, hey,
5 Judge, will you do discovery. And you asked Mr. Clary and I
6 to stipulate this was a complex case. While there are issues
7 in this case, it's far from complex, and we refused. And you
8 then instructed plaintiffs' counsel to file a motion to
9 determine it's a complex case and then you'd take over
10 discovery.

11 THE COURT: Sure.

12 MR. SEGEL: It was never done. Then they filed a
13 motion in front of Judge Denton, Department 13 -- speak to
14 your assistant and are told that, just leave it here. You
15 continued at our request for oral argument, so we're here
16 before you. So, you know, the issue of it was noticed to the
17 right department or not is not really a big issue. But the
18 whole point is that the rules and the case that I cited
19 specifically say that unless this case has been determined to
20 be complex, the Discovery Commissioner has to do discovery
21 motions.

22 THE COURT: True.

23 MR. SEGEL: You know, if it had been a motion to
24 determine as complex, we would have opposed that concept. And
25 if this Court decided it was going to take over discovery, we

1 have no objection to that. We have no issues with you ruling.
2 It's just, as we'll get into my motion for summary judgment,
3 there are rules of procedure. I used to live and die by the
4 rules. Very few judges enforce them anymore. I think you do
5 more than most. But I --

6 THE COURT: But still not as much as you want.

7 MR. SEGEL: Well, probably not. But, you know, no
8 one ever gets what they want, Your Honor. You're the best.
9 And hopefully we'll convince the Judge that we're right.

10 The key here is that we find ourselves -- it's
11 very difficult to defend a case like this one when we have
12 no clue what they're asking for -- and we'll talk about that
13 in my summary judgment motion -- and, two, when they don't do
14 what the rules require us to do. And so if you believe that
15 the cases that I cited are wrong and that you in fact have
16 the right sua sponte to take control of discovery, you'll hear
17 the motion. If you believe that the cases I cited and the
18 rules --

19 THE COURT: Well, I don't care. I've been told by
20 the Supreme Court in Business Court cases that they would
21 prefer that the Business Court judges handle discovery. You
22 know, that's okay. I don't care. It's either a one-step
23 process or a two-step process. I'm going to handle discovery
24 whether you go to the Discovery Commissioner first and then we
25 have a full-blown hearing up here -- that's how we're going to

1 do it. We're going to do it one way or the other. And we're
2 going to do it before we do the motions for summary judgment.

3 MR. CLARY: I didn't hear that last thing you said,
4 Your Honor.

5 THE COURT: We're going to finish the motion to
6 compel one way or the other before I hear the summary judgment
7 motion.

8 So do you want me to hear it, or do you want to go
9 to Commissioner Bulla and have her hear it and then you come
10 back up here and I rule on whatever objection comes out of
11 Commissioner Bulla?

12 MR. SEGEL: Well, Your Honor, since Mr. Clary's
13 counsel for Kokoweef, he just said to me, and I don't
14 disagree, we'll let you hear it. I do have some issues you
15 might want to have some supplemental briefing on on the issue,
16 if you don't mind, but --

17 THE COURT: That's fine. How long do you need?

18 MR. SEGEL: Well, I just -- I thought we could do
19 the arguments, Your Honor. Based on the arguments I may --
20 you know, there may be some issues that arise.

21 THE COURT: No. I like to have the briefing full
22 before you argue.

23 MR. CLARY: Well, but, Your Honor, the fact that we
24 -- the fact that we agree you could hear it doesn't mean we
25 consent to its being granted, obviously.

1 THE COURT: No. I know. That was why we wanted to
2 argue it.

3 MR. CLARY: We'll argue it, right.

4 THE COURT: Do you want to argue it now, or do you
5 want to file a supplemental brief? Because it doesn't matter
6 to me.

7 MR. CLARY: No. Let's argue now.

8 MR. SEGEL: Mr. Clary says argue now, Your Honor.

9 THE COURT: Okay. Come on, Mr. Segel, let's go.

10 MR. SEGEL: Well, it's their motion.

11 THE COURT: Well, yeah. You asked for documents,
12 they didn't give them to you, you're irritated.

13 Mr. Segel.

14 MR. SEGEL: Yes, Your Honor. Well, again, it's
15 Kokoweef. I don't represent Kokoweef, Your Honor. But
16 basically I don't think that the motion that -- and I wasn't
17 really prepared to argue, so Mr. Clary's going to argue. But
18 I didn't think that the motion set forth what it was we didn't
19 produce. As I set forth I think in our opposition, we've
20 given them probably two stacks this high, 12 inches or so, of
21 documentation.

22 The one thing we didn't give them and we're going to
23 fight over is a shareholders list. We don't think that it's
24 appropriate to give a shareholders list on this situation. If
25 they want to explain the benefit of why it's going to be of

1 value to them -- the problem that we've had is they've gone to
2 the Securities Division. We're now having to have
3 investigation by the Securities Division, which we think we'll
4 be successful in defending. But that's an expense of Kokoweef
5 that has to be borne that is not in the benefit of the
6 shareholders.

7 We're also subject to an IRS audit, which is not a
8 problem, because we're not concerned about it. But that's
9 also because of what they've been doing. They went to the
10 State Bar against Mr. Clary. They're doing everything they
11 can do -- the individual plaintiffs are doing everything they
12 could do to try to disrail and kill Kokoweef.

13 Our concern is that they are going to take the
14 shareholders list and contact each and every shareholder. And
15 because of the wonderful case of Thigg versus Oceans, which I
16 unfortunately know because Donna Thigg is the reason I live in
17 Las Vegas, and Dick Oceans's my first interview, you could do
18 anything you want to do. When a case is pending in court you
19 can say anything outside of court, almost, and it's not
20 slander, it's not libel. And so --

21 THE COURT: Well, there's this new CCSD case that
22 says that, too.

23 MR. SEGEL: It's -- the problem, Your Honor, is that
24 what they're doing, what they're saying about Mr. Hahn and
25 what we're doing is they're trying to influence the other

1 shareholders who have full faith in what Mr. Hahn has done
2 through the years, and they're trying to get to those
3 shareholders so that they can try to motivate them against Mr.
4 Hahn. And it's just creating more problems for Kokoweef.

5 So on the shareholder issue we don't think they've
6 shown a justifiable basis for having the shareholders list.
7 So we're fighting over them receiving that.

8 On the other documentation Mr. Clary and Ms. --
9 I'm sorry, I have a mental block.

10 MR. CLARY: Taylor.

11 MR. SEGEL: -- I'm sorry -- Ms. Taylor had a
12 telephone call, as I understand it -- I didn't participate,
13 that's why I shouldn't be arguing this part --

14 MR. CLARY: I'll argue.

15 MR. SEGEL: -- a long telephone conversation
16 December of 2009 where they discussed what would be produced,
17 what wouldn't be produced. And Ms. Taylor -- and this is
18 based on my conversation with Mr. Clary immediately following
19 that conversation --

20 MS. TAYLOR: Objection. Hearsay.

21 THE COURT: IT's an argument.

22 MS. TAYLOR: I'm sorry, Your Honor.

23 THE COURT: It was funny, though, Ms. Taylor.

24 MS. TAYLOR: Thank you, Your Honor.

25 MR. CLARY: I didn't hear what she said.

1 MR. SEGEL: She said, "Hearsay," and the Judge said,
2 this is oral argument.

3 THE COURT: She objected to the argument on hearsay,
4 and I laughed.

5 MR. CLARY: My hearing aids got found at the bottom
6 of the washing machine, so I'm in trouble today.

7 THE COURT: Do you want the cool headphones that we
8 have?

9 MR. CLARY: I'm beginning to think maybe I need
10 them.

11 (Off-record colloquy - Court and Marshal)

12 THE COURT: Hold on a second. Let's get Mr. Clary
13 the headphones.

14 MR. CLARY: When we have these side comments I like
15 to hear them. I might just say, Your Honor, on the issue that
16 Mr. Segel raised, to try to save some time, that we did have
17 that conversation. And her response to my point on that --

18 THE COURT: Hold on a second, Mr. Clary. Let's get
19 you the headphones first.

20 MR. CLARY: And my response to her -- and her
21 response to my affidavit in which I indicated that I had this
22 conversation with her, she doesn't deny that we had the
23 conversation. She just denies that she never communicated
24 with me again. She didn't communication with me, not -- but
25 not -- she never got back to me with the details that she said

1 she was going to set forth in the letter we'd agreed to.

2 THE COURT: Okay. Mr. Segel, you were arguing.

3 MR. SEGEL: Your Honor, the issue -- well, again, I
4 think I've basically -- Mr. Clary and Ms. Taylor had this
5 discussion of what was going to be produced. As Mr. Clary
6 just mentioned, Ms. Taylor theoretically was going to send a
7 letter memorializing what the agreement was, and then Mr.
8 Clary was going to go make sure he got those documents
9 together for her. That -- the letter never came. Mr. Clary
10 never did the work. And there's no new phone call, no new
11 attempt to resolve the issue, and the motion was filed. So
12 I'm sure 234 was satisfied.

13 The big issue that I've got, Your Honor, in being --
14 in saying they want documents and we're not -- okay, Mr.
15 Segel, now respond, is I don't know what they want. I mean,
16 they're saying -- you know, number one, Mr. Clary's position
17 was that -- they put this request for documents in the middle
18 of a notice of deposition. Mr. Clary's position is that
19 that's not proper. He never filed a formal response to the
20 request. So that's one of the issues they raise, as well,
21 there's never a response.

22 So we don't know -- you know, in a motion to compel
23 you're supposed to say, we asked for this and we didn't get
24 this, this, and this. I don't think they have that in their
25 motion. So we don't have the information to know what it is

1 that they claim we didn't produce.

2 There's one set of documents I know that I think we
3 need to supplement, and we're working on --

4 THE COURT: So you don't think that what is attached
5 as Exhibit 1 to their motion is the request for production?

6 MR. SEGEL: Well, let me just look at it, Your
7 Honor.

8 MR. CLARY: Your Honor, even though I objected
9 technically to the form of their request for production,
10 because they never gave one, the fact of the matter is that I
11 treated it as though it had been properly done, and we
12 produced all those documents. You know, I'd like to know what
13 documents we haven't produced. They've never told us. We've
14 asked them --

15 MR. SEGEL: Your Honor --

16 MR. CLARY: -- tell us what documents. And she was
17 going to write me a letter, and we had a procedure that we
18 were going to use. And, I mean, we spent, I don't know, an
19 hour or two on the telephone. And then I never heard from her
20 again, and then she files this motion. This is outrageous.

21 MR. SEGEL: Your Honor, in response to your
22 question, we have responded to most, if not all, of these
23 requests. My understanding of the rules for a motion to
24 compel is that the party that is moving to compel production
25 must list what the request was and what wasn't produced. Here

1 they just listed en banc their entire production. If the
2 Court wants me to go through here and tell you what we've
3 produced, I'll be glad to do that. But I'm telling you right
4 now --

5 THE COURT: Other than the shareholder list, what
6 else did you refuse to produce?

7 MR. SEGEL: The only thing we've -- I think we
8 refused to produce is the shareholders list. I may be wrong.
9 That's my recollection. We did not produce certain
10 documentation regarding loans. We're putting that information
11 together. And we hoped to get a report today. We're still
12 trying to get together. We've had issues -- the Hahns have
13 had issues that have prevented them from doing that in the
14 last few days. So otherwise we would have had that done
15 before.

16 But, you know, on the rest of the requests, with
17 those two -- we've given tax returns, we've given -- they
18 subpoenaed all our monthly statements. They subpoenaed a
19 court [unintelligible] where they subpoenaed the statements
20 not only for Kokoweef and EIN, but for the Hahns individually
21 and for Hahn's Surplus. And that was the protective order
22 that -- we stipulated even though they didn't properly
23 subpoena them, they didn't notice us, we didn't find out about
24 it until -- the 16.1 hadn't been held yet, the JCCR hadn't
25 been filed.

1 THE COURT: So have all the corporate documents and
2 minutes been produced?

3 MR. SEGEL: Yes, I believe they have, Your Honor.

4 THE COURT: Okay. And all of the accounting data
5 that's included in Request Number 16 been produced?

6 MR. SEGEL: Let me look at 16 before I respond, but
7 I believe the answer would be yes once I see it.

8 THE COURT: Well, it doesn't sound like from the
9 description of documents you told me were produced.

10 MR. SEGEL: Your Honor, we -- I'm fairly certain we
11 gave them the QuickBook backup. I'm not positive.

12 THE COURT: They asked for data files in native
13 format.

14 MR. SEGEL: Well, Your Honor, here's -- one of the
15 issues in this case, Mr. Burke a few years ago said, hey,
16 look, all your stuff -- this place was run like a small
17 company. Mr. Hahn -- there were no really paid employees to
18 speak of in the office. Mr. Hahn ran the place. He used a
19 part of his back of Hahn's Surplus as the office for Kokoweef.
20 All he had, volunteers. So there were pieces of paper
21 everywhere. It was not computerized. Mr. Burke demanded --
22 he was a director at the time -- demanded that they
23 computerize everything. So Mr. Burke brought in Rita
24 Vandenworker -- Vandewalker, and Ms. Vandewalker took all
25 these pieces of paper and put them into QuickBooks. That's

1 the first time we had a computerized system. That's all we
2 have.

3 THE COURT: Okay.

4 MR. SEGEL: Prior to the litigation we turned over
5 all those records to them. There was like four or five
6 binders, 3-inch binders of records, checks, backup and
7 whatnot, was given to them prior to the litigation, because
8 they were going to do an audit. Which they never did. And
9 that was a subject of the evidentiary hearing. Mr. Springem
10 [phonetic], their expert, testified that he had reviewed all
11 those documents. That was the basis of his initial finding of
12 red herrings or --

13 THE COURT: So we've never produced it in the native
14 format?

15 MR. SEGEL: No. No, no. I'm not saying no. I'm
16 not sure what you mean by native format. I believe we've
17 given them a disk --

18 THE COURT: It's an electronic backup of QuickBooks
19 that you make, you give it to them, and then their accountant
20 looks at it, and then you guys don't fight so much.

21 MR. SEGEL: I believe -- well, Your Honor, in this
22 case we'll never stop fighting. But I believe we've given
23 them a QuickBooks disk. If we haven't, we have no problem
24 doing it. But I think we have.

25 THE COURT: Okay.

1 MR. CLARY: Sure we have.

2 MR. SEGEL: I'm pretty sure we have. We gave them
3 the backup, the hard copy, before the litigation, as well as
4 supplemental stuff as part of this production.

5 MR. CLARY: I've given them at least five or six
6 disks.

7 THE COURT: Mr. Clary, hold on. Mr. Segel's
8 arguing.

9 Mr. Segel, what else do you think you've refused to
10 produce?

11 MR. SEGEL: The only thing that we refused to
12 produce from my recollection is the shareholders list.

13 THE COURT: Okay.

14 MR. SEGEL: I believe that we didn't fully respond
15 to the loans, and we're supplementing that. We're also going
16 through all the requests to see if there's anything else that
17 we can do to supplement.

18 THE COURT: Okay. Now, Ms. Taylor or Mr. Robertson.

19 MS. TAYLOR: Your Honor, let me first say that all
20 of the side comments that Mr. Segel made about prior motions,
21 et cetera, are really interesting, but not relevant to my
22 motion, which is very straightforward. 30(b)(5) lets me file
23 requests for production along with a 30(b)(6) deposition
24 notice. That's what I did. Rule 34 says, if you want to
25 oppose what's in a request for production you have to do it in

1 the written form. It also says if you want to produce
2 documents you have to do it in the ordinary course of how
3 they're kept in business, and you have to note each category
4 that that document is going to fulfill. And somebody has to
5 sign it, and somebody has to say it's either authentic or
6 certify it in some manner, shape or form.

7 MR. CLARY: How does she say that?

8 MS. TAYLOR: And that has never been done to this
9 date. There's a lot of things that haven't been produced.
10 The September 17th telephone conference with Mr. Clary, it was
11 a two-hour call. Couple of things that were resolved was that
12 he was going to get me tax records that had not been produced
13 from like '04 or '06. He did that several days later. But
14 then they had this whole wash of documents from like the '04
15 to '06 time period, plus they had receipts that hadn't been
16 done. And that's set out in the deposition, that their
17 purported PMK had said, I'm still not done copying receipts, I
18 do it when I have time and when I'm asked. They've never
19 produced that.

20 And so Mr. Clary told me, oh, well, they're scanning
21 documents, they're working on it, we'll get it to you before
22 Christmas. And I said, great, if I don't see it by Christmas,
23 I'm going to have to do a motion to compel, because our
24 September 17th conference would intended to comply with 2.34,
25 even though they had never opposed in written form any of my

1 requests. Never saw it before Christmas. Called him on
2 January 4th, said, give me the status of the rest of the
3 documents you're going to give me. He said, I'll get back to
4 you. He never got back to me. I had to file this motion.

5 I think it's really clear what we haven't gotten. I
6 mean, I said, we don't have the '04, '05, any of the corporate
7 records, we don't have hard copies of a lot of the receipts,
8 we don't know for a fact that we have all the hard copies of
9 the checks, because we can't get a PMK. They produced
10 somebody who was basically their copy service. You know, she
11 would get documents from other people, copy them, and that's
12 what she gave us. I went through very specifically with her
13 every single request. She couldn't tell me whether documents
14 complied with that request, nor could she tell me where they'd
15 come from, where else we might need to look, and who else
16 might know about them.

17 So we don't have that type of certification, we
18 don't have the bulk of the receipts, we don't know what has or
19 hasn't been produced, because we can't get a legitimate
20 certification. Mr. Segel's saying, I think it's all been
21 produced, is one of the problems that we've been having. And
22 that's why I did the depo notice with the RTPs the way I did
23 it.

24 We don't have stock certificates, we don't have a
25 ledger that would show consideration for the shares sold and

1 what the prices were, and until we see a written response and
2 a verification of what's been produced, which request they
3 think it complies with, and a certification from either a PMK
4 or their counsel that that's the totality of the records,
5 we're really in a bind, because we have to keep playing this
6 game with them of -- you know, I just hear for the first time
7 from Nelson, oh, they're still working on it. Now, that
8 totally belies what Mr. Clary said in his opposition, which
9 was, oh, we gave them everything. And so I have to do this
10 dance constantly to try to get records.

11 You know, it's -- there's so many things -- I don't
12 want to get into a he said-she said. The bottom line is they
13 haven't given us records. My deposition notice was proper.
14 They've never given me a legitimate basis to say that, not
15 putting a title on, not attaching it via staple versus
16 building it into the body is inappropriate under 30(b)(5), and
17 it's just really simple. We're requesting you make them
18 certify, you make them delineate under my requests, and you
19 make them produce within a certain time frame so we can get
20 rolling on this.

21 THE COURT: Okay. Anything else, Mr. Segel?

22 MR. SEGEL: Your Honor, I'm not sure the issue of
23 whether or not putting the notice -- the request inside the
24 notice of deposition is appropriate or not.

25 THE COURT: It is.

1 MR. SEGEL: If what they're requesting --

2 THE COURT: It's been for like 15 years.

3 MR. SEGEL: If they're -- oh. I don't --

4 THE COURT: You don't come over here too often.

5 MR. SEGEL: I'll go back to Bankruptcy and play with
6 them back there.

7 If the -- if what they're asking, Your Honor, is
8 that we give a formal response and Mr. Clary sign that formal
9 response --

10 THE COURT: Well, somebody has to sign it.

11 MR. SEGEL: Well, Mr. Clary represents Kokoweef. I
12 can't do it. The requests were to Kokoweef

13 -- then I don't think we have a problem giving that
14 response. And to the extent that we have anything to
15 supplement, we'll supplement. This idea of a certification,
16 I've never heard that we have any obligation to put a specific
17 certification. We have a request, we responded, we're stuck
18 with what we respond to as that's true or not.

19 The ledger -- again, the ledger, until they show the
20 Court why the ledger for the shares or the shares are
21 meaningful in this case, I don't think they should be
22 provided. I don't think there's a justification. I mean,
23 this is something I think that we've raised a sufficient issue
24 on.

25 Mr. Clary has stated to me, and he can up, if you

1 want him to, that he never got a phone call on January 4th,
2 that he never agreed to a December -- before Christmas
3 production, that wasn't the arrangement. But, you know, we
4 have what we have. If the issue with this Court, again, is we
5 give them a response, we give the response. But we believe --
6 with the exception of what I've told you, I believe we've
7 produced everything that we have in our possession. We are
8 continuing to try to go through the records. Again, it's all
9 volunteers. I don't have anybody being paid to do this work.
10 We have volunteers that are doing it. I have not been
11 involved. It sounds like I'm going to have to go over myself
12 and supervise this. I will do that if that satisfies the
13 Court. But Mr. Clary is counsel for Kokoweef. I'll be there
14 as Mr. Hahn, the president's attorney, protecting his
15 interests to make sure everything has been completed. Mr.
16 Clary will sign the response for them, if that's what they
17 need.

18 MS. TAYLOR: Your Honor, if can just -- I'm sorry.
19 Just two --

20 THE COURT: No. It's okay. I'm ready.

21 All right. I need a written response to the request
22 for production which was properly served within 15 days. It
23 needs to be signed by one of the counsel. It doesn't have to
24 be certified, it just needs to be signed with the written
25 responses delineating the documents that are produced in

1 conjunction with that.

2 With respect to the shareholder lists, it's one of
3 the requests. It needs to be produced. I understand you may
4 want some limitation as to the way that is used or disclosed,
5 and I'm happy to discuss with you a limitation on that use.

6 The PMK needs to be produced again after the
7 documents are provided, because the PMK was supposed to bring
8 all the documents with him to the deposition, which is why the
9 notice is served in the fashion it is, within 30 days.

10 As to the documents regarding loans, you say that
11 you're in the process of supplementing that, so you can
12 provide it with the written response.

13 And the QuickBooks electronic data file needs to be
14 produced as part of this.

15 MR. SEGEL: If it hasn't, we'll produce it.

16 MR. CLARY: Your Honor, we had produced five disks
17 for them. I mean --

18 MR. SEGEL: Your Honor, just one clarification. I
19 think we need to address this now. The limitation on the
20 shares. My position would be that if you're requiring us to
21 produced the information from the shareholders list and the
22 ledgers that they be in counsel's possession only and they're
23 not disclosed to the plaintiff at all. If there's a basis for
24 doing so, they can come back to court and --

25 THE COURT: That's right. That's how I usually do

1 it.

2 MS. TAYLOR: And, Your Honor, I would just like to
3 be able to produce them to my expert.

4 MR. SEGEL: [Unintelligible].

5 THE COURT: Okay.

6 MR. ROBERTSON: So stipulated.

7 MS. TAYLOR: Thank you, Your Honor.

8 THE COURT: That'll be the stipulation on the
9 restriction of the shareholders list.

10 MS. TAYLOR: Okay.

11 THE COURT: If you need to use it or have the basis
12 that you feel you need to communicate to any of the
13 shareholders, you have to come back and seek permission from
14 the Court, in which way we will come back with a protocol for
15 you to contact the shareholders in a way that both sides feel
16 that they're adequately informed.

17 MR. SEGEL: May we redact their personal information
18 or --

19 THE COURT: Can we take their Socials off.

20 MR. SEGEL: Well, the addresses and phone numbers,
21 as well, is what I'm asking.

22 MS. TAYLOR: No. Your Honor --

23 THE COURT: The Social Security numbers, yes. As to
24 the addresses, no.

25 But you're not to contact them, and your expert's

1 not to contact them.

2 MS. TAYLOR: That is fine, Your Honor.

3 MR. ROBERTSON: And, Your Honor, I just want to get
4 a clarification on the protective order. It's essential that
5 I be able to consult with my clients, who are shareholders in
6 that list, because the discrepancy is how many shares they own
7 between the plaintiffs and the corporation.

8 THE COURT: Here's the deal. You look at it, you
9 digest it, you can talk to your clients about it. You can't
10 show it to your clients, and you can't talk to any of the
11 shareholders --

12 MR. ROBERTSON: That's fine. I don't have --

13 THE COURT: -- except your clients.

14 MR. SEGEL: And they not disclose who a shareholder
15 is other than that individual shareholder.

16 THE COURT: He's the lawyer. He's going to digest
17 it. He will find out who the shareholders are. If he wants
18 to talk to his client about who a shareholder is, he can talk
19 to his client about that. But neither he nor his client or
20 his expert will contact the shareholders. He cannot show the
21 documents to his client.

22 MR. SEGEL: Your Honor, my concern is that, again,
23 Mr. Burke, who we've set forth -- as an aside, we're not
24 addressing that issue today -- is not really a shareholder,
25 because he holds his shares in an LLC. But Mr. Burke has --

1 you know, we've alleged in our pleadings throughout that Mr.
2 Burke's intent is to destroy Kokoweef. I have evidence of
3 their desires to get rid of Kokoweef and merge it with the
4 lesser of the mine. We have serious concerns, legitimate
5 concerns that any disclosure of any of the names of the
6 shareholders will somehow miraculously be disclosed. I would
7 ask at this point that the Court order that no disclosure of
8 any shareholders other than -- if they want to talk to Mr.
9 Burke about the number of shares we show that he has, I have
10 no problem with that, or show to Mr. Kehoe the shares that he
11 has, I have no issue with that. But disclosing any
12 information about any shareholder other than the specific
13 shareholder who they're discussing with I think at this stage
14 should be held in abeyance, should be restricted. If they
15 have an issue with that, I'll talk to Mr. Robertson or Ms.
16 Taylor. If we can reach an agreement, we do. Otherwise, come
17 back before Your Honor. There's serious issues here.

18 MR. CLARY: Your Honor, if I could --

19 THE COURT: Wait. Can I just say something, please.

20 My typical activity on what this is is an attorney
21 eyes only with a limited restriction. So you get one
22 corporate representative, you get one expert. The information
23 cannot be disclosed any further than that. In this case I am
24 restricting it. I'm not allowing them to show the information
25 to the one corporate representative. It is attorneys' eyes,

1 experts. Those are the only two. It will not be disclosed
2 further.

3 However, the information that is being reviewed in
4 order for counsel to properly handle the case, they have to be
5 able to go through the information, digest it, and then
6 discuss it with their clients.

7 So to the extent that they need to discuss with
8 their client who the other shareholders are, they will be
9 permitted to do so.

10 MR. SEGEL: All right. And so, Your Honor, you're
11 giving us 30 days to produce that; correct?

12 THE COURT: No. I gave you 20 days.

13 MR. SEGEL: Twenty days? I'm sorry.

14 MS. TAYLOR: Your Honor, I thought it was 15 days.

15 THE COURT: I'm sorry. Fifteen days. Fifteen. And
16 30 days to produce the PMK. Sorry.

17 MR. CLARY: Your Honor, there's one fact you need to
18 be made aware of. Mr. Segel gave you some background on
19 what's happened -- what's really happening in the case and how
20 we view the case. But you need to be aware of the fact that
21 Mr. Burke over here sends out these outrageous newsletters to
22 whatever shareholders' names he can get a hold of. And that
23 is the ultimate fear that we have.

24 THE COURT: If I find out that Mr. Burke sent a
25 newsletter to any new shareholders that he hasn't previously

1 sent the newsletter to after this information is shown to Alex
2 Robertson or Jennifer Taylor, then we might have a problem and
3 I might put somebody in jail if I find them in contempt of my
4 order.

5 MR. CLARY: Thank you very much.

6 MR. SEGEL: Your Honor, would the Court entertain a
7 motion on shortened time to have Mr. Burke disqualified as a
8 plaintiff in this case?

9 THE COURT: You may certainly file such a motion.

10 MR. SEGEL: Thank you, Your Honor.

11 THE COURT: And I, you know, will then set it, and
12 we'll figure out when to have it, and I'll look at my calendar
13 and see when I can give you.

14 MR. SEGEL: I appreciate that.

15 THE COURT: Okay. If there are any concerns
16 regarding the protective order that we've just talked about,
17 if you have trouble in reaching an agreement as to the
18 specific language, please email both versions to me by Tuesday
19 of next week so that Katie and I can then fashion the language
20 that I intended to communicate to you today if you don't agree
21 with what -- if you didn't both get the same version of what I
22 said.

23 MR. SEGEL: Has that ever happened, Your Honor?

24 THE COURT: Never.

25 MR. SEGEL: Thank you.

1 MR. ROBERTSON: Plaintiffs understand perfectly.

2 THE COURT: So the motions for summary judgment are
3 off calendar, to be renoticed after the completion of the
4 30(b)(6) deposition. So if you want to have them renoticed,
5 then you'll just refile it with a notice, attach it, and then
6 we'll have a supplemental opposition that'll include the
7 information from the 30(b)(6) depo.

8 MR. CLARY: Now, how do we determine who's going to
9 be -- appear? We in good -- I can tell you in good faith
10 based upon my interview of my clients and their employees or
11 their help, their unpaid employees, as to who is the most
12 informed person on the documents that they had requested. And
13 they contend that that wasn't the right person. Now, how am I
14 supposed to -- how are we ever going to have that deposition?
15 Because they're going to come back and say, they still didn't
16 designate the right person, they didn't designate the right
17 person.

18 THE COURT: Here's the deal, Mr. Clary.

19 MR. CLARY: How do we resolve that?

20 THE COURT: Under Rule 30 you are required to -- you
21 or your client are required to find a person or make a person
22 the most knowledgeable person with respect to the categories
23 that have been delineated in the notice of deposition.

24 MR. CLARY: So if we have to produce 15 people, we
25 produce 15 people?

1 THE COURT: That's how it usually works. And then
2 as each one is there they tell which area they have been
3 designated as the PMK for, and then the deposition goes
4 forward. That can be a cumbersome process, but it is the
5 process that Rule 30(b)(6) is designed to insure, because this
6 individual is the one who is binding the corporation. So
7 you're the one who gets to pick, and then the corporation gets
8 -- or the entity gets bound by it. So --

9 MR. SEGEL: Your Honor, could I -- you want to
10 continue the motion for summary judgment. And I appreciate
11 that. But my concern is that I think we've asked for three
12 different partial summary judgments. We asked for one on the
13 negligent misrepresentation --

14 THE COURT: I saw that.

15 MR. SEGEL: -- and --

16 THE COURT: I read them all.

17 MR. SEGEL: I'm sure you did. I'm sure you --

18 THE COURT: I even read the motions first before I
19 read the motion to compel. And I realized, gosh, I should
20 have read the motion to compel first.

21 MR. SEGEL: If I could have told you, I would have.
22 But I couldn't do that.

23 THE COURT: Yeah.

24 MR. SEGEL: The other is -- and that's against Mr.
25 Hahn individually, and then Mr. Clary has the same motion.

1 The second motion for summary judgment -- or partial
2 summary judgment is against Hahn Surplus as to unjust
3 enrichment.

4 And then the third is where we're asking this Court
5 to determine that this is not a derivative action based upon
6 the fact that the plaintiffs are seeking -- you've read it.

7 THE COURT: Yeah. They're saying arguably both
8 derivative and direct. And I'm not really clear on which it
9 is at this point.

10 MR. SEGEL: Well, me -- and my concern -- we could
11 use some direction, Your Honor. And I don't know if you're
12 prepared to address any portion of these. But the issue of
13 whether this is derivative or not I think has nothing to do
14 with what was produced or not produced. The issue of Hahn
15 Surplus, the record reflects that they received all of this
16 documentation. There's nothing in the requests that would
17 have given them any more information or any further ability to
18 defend this case today.

19 And the third issue, the motion for summary judgment
20 on the negligent representation I also don't think that --

21 THE COURT: Well, you're going to lose that one on
22 negligent misrepresentation. I thought they pled it
23 adequately. And since discovery is not completed, I was going
24 to deny it without prejudice for you to renew it following the
25 depositions. But instead I said we'd just continue it to

1 follow it.

2 MR. SEGEL: I guess we're continuing, then. All
3 right.

4 THE COURT: So here's the other deal. The issue on
5 the derivative versus direct action, I think your request to
6 disqualify the particular representative plaintiff is a more
7 effective way of handling that issue. And you made that
8 request and asked if I would sign an OST, and I said I would.
9 Because in reading this I am unable to say it's not a
10 derivative action; however, it does appear to me that there
11 may be issues with who the representative is. How's that?

12 MR. SEGEL: Well, the issue, Your Honor, is that all
13 of the plaintiffs as they sit here today are asking for relief
14 on their own. And then we also have this issue that seems to
15 be -- I don't know how we litigate it, but a prayer that says,
16 plaintiffs request reflect from defendants is
17 [unintelligible], and they ask for damages. There's nothing
18 as in the original complaint where they seek damages on behalf
19 of Kokoweef. And so my recollection of basic pleading was
20 that if you don't pray for it, you don't get it. And if it's
21 not in the prayer, how can this be a derivative action, how
22 can people that are seeking damages for themselves be
23 representatives of the -- all the shareholders when they're
24 seeking to get damages for their own benefit? And that's my
25 issue. I don't know how to address that.

1 THE COURT: I understand exactly what your issue is.
2 The issue is does the money go back to the corporation when we
3 have new people in charge of the corporation, or does the
4 money go back to the claimants who are making a direct action
5 that they lost -- had damages. I am unclear, after reading
6 the briefing, which this is. It appears to be a mixed group
7 of derivative and direct claims at this point, and I would
8 anticipate that at some time after the 30(b)(6) deposition is
9 completed that there will be a narrowing and tailoring of
10 those issues, because they have to make an election as to
11 whether they are going to pursue the claims on the derivative
12 basis or the direct basis. Because the same claim may be
13 both. The question is do the proceeds then go back to the
14 entity from a derivative standpoint, or do they go back to the
15 individuals as a direct standpoint. And if I've got to
16 disqualify someone as a representative because they've been
17 bad, then that's a whole complicating factor.

18 MR. CLARY: Well, the thing that bothers me, Your
19 Honor, is that it's not just the prayer. If you read this
20 huge -- how many pages amended complaint, the actual language
21 of the complaint itself, even if you didn't have the prayer,
22 doesn't state a claim against -- that's a derivative claim.

23 THE COURT: I understand your position, Mr. Clary.
24 So, Mr. Segel, it's your choice on whether I give
25 you a date now that's about 30 days after I anticipate the

1 30(b)(6) being completed, or if you want to just renotice it
2 after the completion of that and attach your motion. Because
3 I don't know that your motion's going to change. You may want
4 to supplement it with what happens between now and then. It's
5 up to you.

6 MR. SEGEL: Okay.

7 THE COURT: But my intention is not to have it heard
8 until I can get the briefing related to that motion.

9 MS. TAYLOR: Your Honor --

10 THE COURT: Hold on. I'm talking to Mr. Segel.

11 MR. SEGEL: Your Honor, I would --

12 MR. CLARY: Hold on a minute.

13 MR. SEGEL: Mr. Clary wants me to just renotice it.
14 I'll just do my best and not get my foreclosure mediation
15 scheduled so I can be here.

16 But I do have one issue we need to address, as well,
17 about the pleading. And the issue is these late surreplies.

18 THE COURT: I didn't read it.

19 MR. SEGEL: I appreciate that. But I --

20 THE COURT: It was too late.

21 MR. SEGEL: But could we please have an order from
22 this Court that we follow the rules unless you get a Court
23 order to do otherwise?

24 THE COURT: Well, here's the deal. If I don't get
25 it in time, I don't read it. So it's better than the rule.

1 MR. SEGEL: All right. I got that. Thank you. I'm
2 slow, but I learn.

3 MR. CLARY: Well, the reply in support of this
4 motion we're arguing right now wasn't on time.

5 THE COURT: Well, there's this flexible -- when the
6 Supreme Court changed the service rules, they didn't change
7 the when notices of motion -- when notices of motions are set,
8 so there is inherently a conflict that I'm currently trying to
9 fix with the new rules that have been discussed at the last
10 two civil judges meetings where Mr. Segel was lucky enough to
11 attend. So we're trying to fix that. But there is by
12 necessity of the change that was made two years ago and the
13 lack of change by the Eighth Judicial District Court, a
14 conflict of when reply briefs get filed. And I recognize
15 that, and I'm really trying real hard from an administrative
16 perspective to fix it, but I haven't got it done yet.

17 MR. CLARY: Well, we wish you luck on doing so.

18 THE COURT: Yeah. And once I get it done, then it
19 takes six months for the Supreme Court to approve it.

20 MR. SEGEL: Thank you, Your Honor.

21 THE COURT: Welcome to my world of administration.
22 Anything else on this case today?

23 MR. SEGEL: Ms. Taylor had a comment.

24 THE COURT: Ms. Taylor.

25 MR. CLARY: Long as I don't have to attend any more

1 meetings, that's good.

2 MS. TAYLOR: Your Honor, part of my motion to compel
3 asked for an extension.

4 THE COURT: I know. I'm not moving the dates yet.

5 MS. TAYLOR: Will I be able to --

6 THE COURT: You're going to be able to ask me to
7 move the expert dates after you get the documents in 15 days,
8 and then you're going to tell me, Judge, I got the documents,
9 I still need to do Z, Y, and Z, I looked at your schedule, the
10 schedule looks good to me, so if you and Mr. Segel and Mr.
11 Clary are able to stipulate this kind of looks good to me, but
12 I wanted to make sure you got the documents, because I thought
13 the schedule might be too aggressive, depending on what
14 documents you've got.

15 MS. TAYLOR: Okay. Thank you, Your Honor.

16 MR. SEGEL: Your Honor, I think once we have the --
17 you hear the summary judgment motion, we may or may not be
18 willing to an extension of time. Thank you.

19 THE COURT: I'm not really worried about it. It's
20 going to get extended one way or the other if the documents
21 are too voluminous or -- yeah.

22 MR. SEGEL: I appreciate it. I think we're pretty --

23 THE COURT: Okay.

24 MR. SEGEL: Thank you, Your Honor.

25 THE PROCEEDINGS CONCLUDED AT 9:43 A.M.

CERTIFICATION

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE AUDIO-VISUAL RECORDING OF THE PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

AFFIRMATION

I AFFIRM THAT THIS TRANSCRIPT DOES NOT CONTAIN THE SOCIAL SECURITY OR TAX IDENTIFICATION NUMBER OF ANY PERSON OR ENTITY.

FLORENCE HOYT
Las Vegas, Nevada 89146

Florence M. Hoyt

FLORENCE HOYT, TRANSCRIBER

3/31/10

DATE

Exhibit 3


CLERK OF THE COURT

1 **ORDR**
2 **M NELSON SEGEL, CHARTERED**
3 **M NELSON SEGEL, ESQUIRE**
4 Nevada Bar No. 0530
5 624 South 9th Street
6 Las Vegas, Nevada 89101
7 Telephone: (702) 385-5266
8 Attorneys for Defendants Larry Hahn
9 and Hahn's World of Surplus, Inc.

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DISTRICT COURT OF NEVADA
COUNTY OF CLARK

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

16 Plaintiffs,

17 vs.

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

22 Defendants,

23 and

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

26 Nominal Defendants.

CASE NO. 08A558629
DEPT NO. XI

DATE: 3/30/10
TIME: 9:00 a.m.

ORDER REGARDING PLAINTIFFS' MOTION TO COMPEL

1 Plaintiffs' Motion to Compel ("MOTION") having come on for hearing on the 30th day of
2 March, 2010, Plaintiffs appearing by and through their attorneys, Alexander Robertson, Esq., and
3 Jennifer Taylor, Esq., Defendant Patrick C. Clary and Nominal Defendant Kokoweef, Inc.
4 ("KOKOWEEF") appearing by and through Patrick C. Clary, Chartered and Defendants Larry Hahn
5 and Hahn's World of Surplus, Inc. appearing by and through their counsel, M Nelson Segel, Esq.,
6 the Court having reviewed the pleadings and papers on file, having heard the arguments of counsel
7 and good cause appearing therefor; it is hereby

8 ORDERED that Nominal Defendant KOKOWEEF is directed to provide Plaintiffs with a
9 formal, written response, pursuant to NRCP 34, to their Request for Production of Documents as
10 contained in the Notice of Deposition of Pursuant to NRCP 30(b)(6) of the Custodian and Keeper
11 of Records of Kokoweef, Inc. ("REQUEST") no later than April 14, 2010; and it is further

12 ORDERED that not in limitation of the language set forth above, but as further clarification,
13 Nominal Defendant KOKOWEEF is directed to provide a computer disk with the information
14 requested in Request No. 16, if not previously provided to Plaintiffs, no later than April 14, 2010;
15 and it is further

16 ORDERED that not in limitation of the language set forth above, but as further clarification,
17 Nominal Defendant KOKOWEEF is directed to provide responses to Request No. 8 no later than
18 April 14, 2010; and it is further

19 ORDERED that not in limitation of the language set forth above, but as further clarification,
20 Nominal Defendant KOKOWEEF is directed to provide the shareholder documents requested in
21 Requests No. 14 and 24 to Plaintiffs' counsel no later than April 14, 2010, subject to the provisions
22 of this Order; and it is further

23 ORDERED that all documents provided to Plaintiffs' counsel in response to Requests No.
24 14 and 24 shall be segregated from any other documents produced and designated as being produced
25 pursuant to Requests No. 14 and 24 ("Shareholder Records"); and it is further

26 ORDERED that all Shareholder Records shall be held by counsel for Plaintiffs as
27 confidential and shall not be disclosed to anyone without further order of this Court or as provided
28 herein; and it is further

1 ORDERED that Plaintiffs' counsel may provide copies of the Shareholder Records to Ed
2 Apenbrink, the expert that has been retained by Plaintiffs in this matter; and it is further

3 ORDERED that Plaintiffs' counsel may discuss the contents of the Shareholder Records with
4 the following three (3) Plaintiff representatives, Ted Burke, Michael Randolph and Lauretta Kehoe,
5 but may not provide copies to or allow any shareholder to review the Shareholder Records; and it
6 is further

7 ORDERED that nothing contained herein shall prevent Plaintiffs' counsel from disclosing
8 to any of the Plaintiffs the contents of, but not the actual records, of their Shareholder Records; and
9 it is further

10 ORDERED that any disclosure of the information contained in the Shareholder Records by
11 any person without a further order of this Court, or the stipulation of all parties hereto, shall
12 constitute a violation of this Order and subject such person to contempt of Court; and it is further

13 ORDERED that neither Plaintiffs, Plaintiffs' counsel, Plaintiffs' aforesaid expert nor anyone
14 acting on their behalf shall make any effort to contact or disseminate any information about any of
15 the shareholders who are identified in the Shareholder Records unless direct contact had been made
16 with said shareholder by Plaintiffs, Plaintiffs' counsel or Plaintiffs' expert prior to 30th day of March,
17 2010; and it is further

18 ORDERED that disclosure of the information contained in the Shareholder Records to
19 employees of Plaintiffs' counsel or Plaintiffs' said expert who have a need to review said documents
20 in the course of providing services on behalf of Plaintiffs in this matter shall not constitute an
21 improper disclosure of the Shareholder Records; and it is further

22 ORDERED that each person who is to be given access to, and allowed to review, the
23 Shareholder Records shall be provided a copy of this Order; and it is further

24 ORDERED that a continued deposition of the corporate designee, or designees, pursuant to
25 NRCP 30(b)(6), as set forth in the Notice of Deposition Pursuant to NRCP 30(b)(6) of the Custodian
26 and Keeper of Records of Kokoweef, Inc. dated and served on the 14th day of August, 2009, shall
27 be held at Litigation Services, 1640 Alta Drive, Las Vegas, Nevada, on the 30th day of April, 2010,
28 at the hour of 9:00 a.m.; and it is further

1 ORDERED that the pending Motions for Partial Summary Judgment shall be taken off
2 calendar and may be renoticed after the deposition of KOKOWEEF's NRCP 30(b)(6) witness or
3 witnesses.

4 DATED this 19 day of April, 2010.

5
6 
7 DISTRICT COURT JUDGE

8 Submitted by:

9 M NELSON SEGEL, CHARTERED

Approved:

ROBERTSON & VICK

10
11 By 

12 M NELSON SEGEL, ESQUIRE
13 Nevada Bar No. 0530
624 South 9th Street
14 Las Vegas, Nevada 89101
Attorneys for Defendants Larry Hahn
and Hahn's World of Surplus, Inc.

By 

JENNIFER TAYLOR, ESQUIRE
Nevada Bar No. 5798
401 North Buffalo Drive, Suite 202
Las Vegas, Nevada 89145
Attorneys for Plaintiffs

15 Approved:

16 PATRICK C. CLARY, CHARTERED

17
18 By 

19 PATRICK C. CLARY, ESQUIRE
20 Nevada Bar No. 0053
7201 West Lake Mead Blvd, Suite 410
21 Las Vegas, Nevada 89101
Attorneys for Defendants Kokoweef, Inc. and
Patrick C. Clary

Exhibit 4

1 RSPN
2 PATRICK C. CLARY, CHARTERED
3 Patrick C. Clary
4 Nevada Bar No. 00053
5 City Center West, Suite 503
6 7201 West Lake Mead Boulevard
7 Las Vegas, Nevada 89128
8 Telephone: 702.382.0813
9 FAX: 702.382-7277

6 Attorneys for so-called Nominal
7 Defendant Kokoweef, Inc. and
8 Defendant Patrick C. Clary

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 -oOo-

11 TED R. BURKE; MICHAEL R. and) CASE NO. A558629
12 LAURETTA L. KEHOE; JOHN BERTOLDO;) DEPT NO. XI
13 PAUL BARNARD; EDDY KRAVETZ; JACKIE)
14 & FRED KRAVETZ; STEVE FRANKS;) SO-CALLED NOMINAL DEFENDANT
15 PAULA MARIA BARNARD; PETE T. and) KOKOWEEF, INC.'S RESPONSE TO
16 LISA A. FREEMAN; LEON GOLDEN;) REQUEST FOR PRODUCTION OF
17 C.A. MURFF; GERDA FERN BILLBE;) DOCUMENTS CONTAINED IN PLAIN-
18 BOB and ROBYN TRESKA; MICHAEL) TIFFS' NOTICE OF DEPOSITION
19 RANDOLPH; and FREDERICK WILLIS,) PURSUANT TO NRCP 30(b)(6) OF
20) THE CUSTODIAN AND KEEPER OF
21) RECORDS OF KOKOWEEF, INC.
22 Plaintiffs,)
23 vs.)
24)
25 LARRY H. HAHN, individually, and)
26 as President and Treasurer of)
27 Kokoweef, Inc., and former)
28 President and Treasurer of)
Explorations Incorporated of)
Nevada; HAHN'S WORLD OF SURPLUS,)
INC., a Nevada corporation;)
PATRICK C.CLARY, an individual;)
DOES 1 through 100, inclusive;)
Defendants,)
and)
KOKOWEEF, INC., a Nevada)
corporation; EXPLORATIONS)
INCORPORATED OF NEVADA, a)
dissolved corporation,)
Nominal Defendants.)

1 REQUEST NO. 1: All Federal and State Income Tax Returns,
2 including all schedules, forms, attachments, and other supporting
3 documents or writing for each such return for each of the following
4 years: 2004-2008.

5 RESPONSE: All requested documents have been heretofore produced
6 and delivered to the Plaintiffs' attorneys and, except for the 2008
7 Return, are identified in the Directory of Documents Produced ("the
8 Directory") attached hereto as Exhibit A and incorporated herein by
9 this reference.

10 REQUEST NO. 2: All statements for each month for each year from
11 2004 - 2009 for any accounts at any financial institution, including
12 but not limited to, checking accounts, savings accounts, money market
13 accounts, time deposit accounts, retirement accounts, pension plan
14 accounts, profit sharing accounts, stock purchase plan accounts,
15 annuity accounts, stock accounts, bond accounts, ready asset accounts,
16 mutual fund accounts, loan accounts, credit accounts, mortgage
17 accounts, or any similar such accounts.

18 RESPONSE: There were and are no savings accounts, money market
19 accounts, time deposit accounts, retirement accounts, pension
20 accounts, profits sharing accounts, stock purchase loan accounts,
21 annuity accounts, stock accounts, bond accounts, ready assets
22 accounts, mutual funds accounts, loan accounts, or mortgage accounts.
23 All other requested documents have previously been produced on
24 computer discs heretofore delivered to Plaintiffs' attorneys and are
25 identified in the Directory.

26 REQUEST NO. 3: For all months in all years from 2004 - 2009, all
27 cancelled checks, voucher portions of checks, or other document or
28 writing evidencing withdrawals or transfers of funds from each account

1 for which statements are produced as requested in No. 2 above and are
2 identified in the Directory.

3 RESPONSE: All documents requested have been heretofore produced
4 as set forth in Response No. 2 and are identified in the Directory.

5 REQUEST NO. 4: For all months in all years from 2004 - 2009, all
6 deposit slips or any other document or writing evidencing the source
7 of funds deposited to each account for which statements are produced
8 as requested in No. 2 above.

9 RESPONSE: See Response to Request No. 3 above.

10 REQUEST NO. 5: For all months in all years from 2004- 2009, all
11 ledgers, reconciliation reports, registers, or other type of list used
12 for tracking the balance of each account for which statements are
13 produced as requested in No. 2 above.

14 RESPONSE: See Response to Request No. 3 above.

15 REQUEST NO. 6: For all months in all years from 2004 - 2009, any
16 communications with any individual concerning any of the accounts at
17 any of the financial institutions for which statements are produced
18 as requested in No. 2 above.

19 RESPONSE: No such documents are known to exist.

20 REQUEST NO. 7: For all months in all years from 2004-2009, all
21 statements or billings received from each and every creditor of debts
22 incurred or paid during the discovery period, including but not
23 limited to, copies of all vendor invoices or statements and other paid
24 bill files.

25 RESPONSE: See Response to Request No. 3 above. Additional
26 documents in response to this Request are hereby produced on the
27 computer disc bearing the label "KI files 4-12-10," which is being
28 delivered to the Plaintiffs' attorneys herewith ("the New Disc") and

1 are identified in the Directory on page 5 thereof as the "SIMSHAUSER
2 NOTES." Also see Response to Request No. 26 below.

3 REQUEST NO. 8: For all months in all years from 2004 - 2009, all
4 mortgages, promissory notes, or other types of indebtedness
5 representing monies owed.

6 RESPONSE: The requested documents are hereby produced on the New
7 Disc and are identified in the Directory on page 5 thereof as the as
8 the "SIMSHAUSER NOTES." See also Response to Request No. 26 below.

9 REQUEST NO. 9: For all months in all years from 2004 - 2009, all
10 loan applications, treatment of, deductions from cash value of, and
11 disposition of any proceeds from any insurance policies for which
12 documents are produced pursuant to the above request.

13 RESPONSE: See Response to Request No. 6 above.

14 REQUEST NO. 10: Any writings or other documents which evidence
15 or describe your treatment of, deductions from cash value of, and
16 disposition of any proceeds from any insurance policies for which
17 documents are produced pursuant to the above request.

18 RESPONSE: See Response to Request No. 6 above.

19 REQUEST NO. 11: Any documents or writing evidencing any real
20 estate acquired or disposed of between 2004 - 2009.

21 RESPONSE: See Response to Request No. 6 above.

22 REQUEST NO. 12: All registration, title of ownership, tax
23 assessments, or other documents or writings evidencing each purchase,
24 sale, use, or ownership of all vehicles, snowmobiles, trailers,
25 motorcycles, boats, watercraft, trucks, campers, off-highway vehicles,
26 and any other similar type of assets from 2004 to present.

27 RESPONSE: See document entitled "Detail Report" attached hereto
28 as Exhibit B.

1 REQUEST NO. 13: All documents or writing evidencing, explaining,
2 or detailing any inquiries, offers made, or offers received for
3 purchase or sale of any stock, real estate, personal property, or
4 business interest from 2004 to the present.

5 RESPONSE: All documents requested have been heretofore produced
6 as set forth in Response No. 2 and are identified in the Directory.
7 See also Responses to Request Nos. 14 and 24.

8 REQUEST NO. 14: All stockholder lists or ledgers outlining the
9 name, address, phone number, and number of shares held for each
10 stockholder from any time.

11 RESPONSE: All documents in response to this Request which are
12 hereby produced on the New Disc and are also identified in the
13 Directory.

14 REQUEST NO. 15: Any business agreements, corporate documents,
15 organizational documents, articles of incorporation, by-laws, minutes,
16 joint venture agreements, operating agreements, partnership
17 agreements, limited liability company agreements, documents amending
18 any such documents, or other such similar documents or writings
19 pertaining to any type of organization.

20 RESPONSE: There are no joint venture agreements, operating
21 agreements, partnership agreements, limited liability company
22 agreements known to exist. See Response to Request No. 1 above.

23 REQUEST NO. 16: Copies of ESI files, in native format, for all
24 computer programs utilized in the management and record keeping of
25 Kokoweef, including but not limited to:

- 26 a. QuickBooks data files
27 b. Microsoft Money data files
28 c. Peachtree Accounting data files
 d. MAS90 data files
 e. Quicken data files

- f. Usernames and passwords for the administrative account for all data files
- g. Name and version of program for which data file operates

RESPONSE: A computer disc containing the QuickBooks data files was previously produced and delivered to the Plaintiffs' Counsel and are identified in the Directory.

REQUEST NO. 17: All financial budgets or projections for Kokoweef prepared or started in 2004 and running through the present.

RESPONSE: No such documents are known to exist

REQUEST NO. 18: Cash receipt registers/ledgers and cash disbursements register/ledgers for Kokoweef for all periods from 2004 through 2009.

RESPONSE: See Response to Request Nos. 7 above and 26 below.

REQUEST NO. 19: Any list, document, writing, or schedule that shows, reflects, or establishes all assets, property, and equipment that is used by Kokoweef, including but not limited to:

- a. Description
- b. Date acquired
- c. Original purchase price
- d. Acquisition type (lease or purchase)
- e. Acquisition amount
- f. Useful life information
- g. Date replacement anticipated
- h. Estimate of current value
- i. Depreciation schedule

RESPONSE: See said Exhibit B attached hereto.

REQUEST NO. 20: Any recent property tax assessments or other appraisals for any of the above items if such exist.

RESPONSE: See Response to Request No. 2. No appraisals exist.

REQUEST NO. 21: Any list, document, writing, or schedule that shows, reflects or establishes all prepaid expenses for Kokoweef.

RESPONSE: No such documents are known to exist except with respect to payments relating to mining claims and insurance.

1 REQUEST NO. 22: All existing agreements and contracts including,
2 but not limited to: Covenants not to compete; Supplier agreements;
3 Equipment leases; Rental contracts; Loan agreements; Labor contracts;
4 and so on for Kokoweef.

5 RESPONSE: No such documents are known to exist.

6 REQUEST No. 23: All claims held, patented, unpatented or
7 otherwise, an all documents demonstrating renewals for 2009 and
8 forward.

9 RESPONSE: All requested documents have been heretofore produced
10 and delivered to the Plaintiffs' attorneys.

11 REQUEST NO. 24; All shareholder ledgers, stock certificates, and
12 any other information delineating the number of shares sold, the
13 identity of shareholders, the amounts paid for the same, and the
14 current value of the shares.

15 RESPONSE: See Response to Request No. 14; however, time
16 constraints made it impossible to timely copy the voluminous Stock
17 Register and the Stock Ledgers (and to redact the social security
18 numbers therefrom), both of which will made available for inspection
19 at Kokoweef's offices located at 2908 East Lake Mead Blvd., North Las
20 Vegas, Nevada, at an early date and time to be mutually agreed upon
21 among counsel for the respective parties hereto.

22 REQUEST NO. 25: Any and all documents relating to, leading up to
23 or prepared in anticipation of the November 2005, "Agreement and Plan
24 of Reorganization" between EIN and KOKOWEEF, including all documents
25 related to EIN's assets and liabilities.

26 RESPONSE: All requested documents have been heretofore produced
27 and delivered to the Plaintiffs' attorneys.

28 REQUEST NO. 26: For all months in all years from 2004 - 2009, any

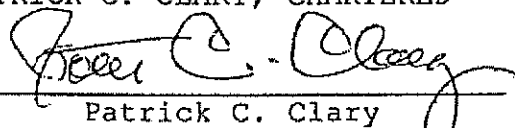
Law Offices of
PATRICK C. CLARY, CHARTERED
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Tel: 702.382.0813 - Fax: 702.382-7277

1 and all receipts, invoices, purchase order or other such documentation
2 that correspond to the checks written and the deposits made as
3 requested in Nos. 3 and 4 above.

4 RESPONSE: All documents requested have been heretofore produced
5 as set forth in Response No. 2 and are identified in the Directory
6 except for the additional documents in response to this Request which
7 are hereby produced on the New Disc and are also identified in the
8 Directory.

9 DATED: April 14, 2010.


10 PATRICK C. CLARY, CHARTERED

11 By 
12 Patrick C. Clary
13 Attorneys for so-called Nominal
14 Defendant Kokoweef, Inc. and
15 Defendant Patrick C. Clary

16 REICEIPT OF COPY

17 Receipt of the above and foregoing So-called Nominal Defendant
18 Kokoweef, Inc.'s Response to Request for Production of Documents
19 Contained in Plaintiffs' Notice of Deposition Pursuant to NRCp
20 30(b)(6) of the Custodian and Keeper of Records of Kokoweef, Inc.,
21 along with one (1) computer disc labeled "K1 Files 4-12-10" is hereby
22 acknowledged.

23 DATED: April 14, 2010.

24 By 
25 Jennifer Taylor, Esq.
26 ROBERTSON & VICK, LLP
27 Attorneys for Plaintiffs

By _____
M. Nelson Segel, Esq.
M. Nelson Segel, Chartered
Attorneys for Defendants
Larry Hahn and Hahn's World of
Surplus, Inc.

EXHIBIT A

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '07 NONCONSECUTIVE) CREDIT CARD #4991	EIN-BC 1 of 100	PL000001 to PL 000100
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '04 NONCONSECUTIVE) CREDIT CARD #4991 & #9325	EIN-BC 1 of 91	PL000101 to PL 000191
2	US Bank Corporate Credit Card (Kokoweef Card, '04-'08, NONCONSECUTIVE) CREDIT CARD #3683	EIN-BUS 1 of 43	PL000192 to PL000232
2	American Express Corporate Credit Card #62007 & #71005, NONCONSECUTIVE	EIN--BAMEX 1 of 100	PL000235 to PL000333
2	American Express Corporate Credit Card #62007, NONCONSECUTIVE, '03 TO '04	EIN--BAMEX2 1 of 100	PL000335 to PL000433
2	American Express Corporate Credit Card #62007 & #63005, NONCONSECUTIVE, '04 to '05	EIN-BAMEX3 1 OF 100	PL000435 to PL000533
2	American Express Corporate Credit Card #63005, NONCONSECUTIVE, '05 to '07	EIN-BAMEX4 1 OF 89	PL000535 to PL000623
2	US Bank Bank Statement (Explorations, '02-'09, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS 1 of 100	PL000624 to PL000723
2	US Bank Bank Statement (Explorations, '06-'08, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS3 1 of 100	PL000724 to PL000823
2	US Bank Bank Statement (Kokoweef & Explorations, '06-'09, NONCONSECUTIVE) CREDIT CARD EIN/#4121 & KI/#3683	EIN-BUS4 1 of 100	PL000824 to PL000923
3	Investor checks and money orders to EIN and KI, '02 to '03	EIN-CK 1	PL002485 TO PL002584
3	Investor checks and money orders to EIN and KI, '04	EIN-CK2 1 of 100	PL003685 TO PL003784
2, 3	Investor checks and money orders to EIN and KI, '03 to '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK3 1 of 100	PL003085 TO PL003184
2, 3	Investor checks and money orders to EIN and KI, '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK4 1 of 100	PL003285 TO PL003384
3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK5 1 of 100	PL004085 TO PL004184
2, 3	Investor checks and money orders to EIN, '04 & '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK6 1 of 100	PL003785 TO PL003884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK7 1 of 100	PL004184 TO PL004284
2, 3	Investor checks and money orders to EIN, '02, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK9 1 of 100	PL002484 TO PL002385
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK8 1 of 100	PL003985 TO PL004084
2, 3	Investor checks and money orders to EIN, '03 & '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK10 1 of 100	PL002985 TO PL003084
3	Investor checks and money orders to EIN, '03, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK11 1 of 100	PL002785 TO PL002884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK12 1 of 100	PL004285 TO PL004384
2, 3	Investor checks and money orders to EIN, '05 & '06, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK13 1 of 100	PL004485 TO PL004584
	Hahn's Surplus Payroll Account "03	HS-US 1 of 100	PL001085 TO PL001184
2, 3, 7, 26	Kokoweef Payouts '06 to '09 & Investor checks and money orders to KI, '07, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	KI-CK2 1-100	PL005285 TO PL005384
	Kokoweef Payouts '06 to '09, NONCONSECUTIVE	KI-CK3 1-100	PL004585 TO PL004684
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK7 1-100	PL005085 TO PL005184
3	Kokoweef Deposit Slips & Investor checks and money orders to KI '07 to '08, NONCONSECUTIVE	KI-USD1 1-100	PL005385 TO PL005484

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK8 1-100	PL005185 TO PL005284
7, 26	Kokoweef Payouts '07, NONCONSECUTIVE	KI-CK6 1-100	PL004985 TO PL005084
7, 26	Kokoweef Payouts KI '07, NONCONSECUTIVE	KI-CK5 1-100	PL004785 TO PL004884
7, 26	Kokoweef Payouts EIN'06, NONCONSECUTIVE	EIN CK29 1 of 100	PL001885 TO PL001984
3, 7, 26	Kokoweef Payouts EIN'06, Investor checks and money orders to EIN '02 to '09, NONCONSECUTIVE	EIN CK30 1 of 100	PL001985 TO PL002084
3	Investor checks and money orders to EIN & KI '04 to '06, and Deposit slips, NONCONSECUTIVE	KICK1 1 of 87	PL005485 TO PL005571
3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EINUS1 1 of 100	PL002185 TO PL002284
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS2 1 of 100	PL003385 TO PL003484
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS3 1 of 100	PL003485 TO PL003584
2	US Bank Statements for Kokoweef '05 to '06, NONCONSECUTIVE	KI-US53 1 of 61	PL001026 TO PL001084
2	US Bank Statements for Kokoweef '06 TO '08, NONCONSECUTIVE	KI-US52 1 of 61	PL000924 TO PL001023
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-US4 1 of 100	PL003485 TO PL003584
	Kokoweef Payouts '07	KI-CK4 1 of 100	PL004685 TO PL004784
2	US Bank Statements for Kokoweef & Exploration '04 TO '09, NONCONSECUTIVE & signature cards	KIUS5 1 of 43	PL000192 TO PL000234
3	Investor checks and money orders to EIN '05 to '06, and Deposit slips, NONCONSECUTIVE	EIN-CK13 1 of 43	PL004385 to PL004484
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK14 1 of 100	PL002085 to PL002184
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK15 1 of 100	PL002885 to PL002984
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK16 1 of 100	PL003585 to PL003684
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK17 1 of 100	PL002685 to PL002784
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK18 1 of 100	PL002585 to PL002684
4, 3	Investor checks and money orders to EIN '05, and Deposit slips, NONCONSECUTIVE	EIN-CK19 1 of 100	PL003885 to PL003984
4, 3	Investor checks and money orders to EIN '03 to '05, and Deposit slips, NONCONSECUTIVE	EIN-CK20 1 of 100	PL003185 to PL003284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK21 1 of 100	PL002285 to PL002384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK22 1 of 100	PL001185 to PL001284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK23 1 of 100	PL001285 to PL001384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK24 1 of 100	PL001385 to PL001484
4, 3	Investor checks and money orders to EIN '03 to '04, and Deposit slips, NONCONSECUTIVE	EIN-CK25 1 of 100	PL001485 to PL001584
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK26 1 of 100	PL001585 to PL001684
7, 26	EIN Payouts '04 to '05, NONCONSECUTIVE	EIN-CK27 1 of 100	PL001685 to PL001784
7, 26	EIN Payouts '05 to '06, NONCONSECUTIVE	EIN-CK28 1 of 100	PL001785 to PL001884

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
4, 3	Investor checks and money orders to EIN '06, and Deposit slips, NONCONSECUTIVE & EIN Payouts '06, NONCONSECUTIVE	EIN.KIC 1 of 1010	PL005574 to PL006580
7, 26	EXPLORATIONSTABLE OF RECEIPTS 2003	EIN 2003 cks and receipts	EX03 1 of 137
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2004	EIN 2004 cks and receipts	EX-04 1 of 86
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2005	EIN 2005 cks and receipts	EX05 - 1 of 90
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2006	EIN 2006 cks and receipts	EX06 - 1 of 94
3, 7, 26	Hahns Surplus Checks	Hahn's Surplus cks and receipts	HS - 1 of 108
4	KI_USbank statements '07	Bank Statements '07	USKI - 1 of 12
	KOKOWEEF INC. presentation	Explanation of cks and receipts given	KIP - 1 of 25
7, 26	KOKOWEEF TABLE OF RECEIPTS 2006	KI 2006 cks and receipts	KO - 06 1 of 27
7, 26	KOKOWEEF TABLE OF RECEIPTS 2007	KI 2007 cks and receipts	KO - 07 1 of 37
7, 26	KOKOWEEF TABLE OF RECEIPTS Brad Johnson	Brad Johnson cks and receipts	BJ 1 of 6
7, 26	KOKOWEEF TABLE OF RECEIPTS Laurie Wright	Laurie Wright cks and receipts	T&L 1 of 19
7, 26, 13	Mayan gold & etc.	Drilling Rig bill of sale & Myan Gold Info	MGECT 1 of 11
7, 26	Payouts	Payouts and receipts	PO 1 of 32
3	04 EIN -- Check Info	EIN_04_bank_check_in fo	EINCI 1 of 70
2	04 EIN --Bank Statements	EIN_04_bank_stateme nts	EIN04BS 1 of 45
2	04 EIN --Bank Statements2	EIN_04_bank_stateme nts2	EIN04BS2 1 of 79
2	04 EIN --Bank Statements3	EIN_04_bank_stateme nts3	EIN04BS3 1 of 68
5	04 EIN --Credit Card Info	EIN_04_credit_card	EINCC04 1 of 50
5	04 EIN --General Ledger	EIN_general_ledger_04	ENGL 1 of 13
5	04 EIN --Balance Sheet	EIN_ledger_balance_sh eet_04	EINLB5 1 of 2
7, 26	04 EIN --Receipts	EIN_receipts_04	EINR04 1 of 71
5	04 EIN --Revenue	EIN_revenue_04	EINPL04 1 of 43
5	KI-09 -- Accounts Payable	KI_09_accounts_payab le	KIAP09 1 of 15
2	KI-09 -- Bank Statements	KI_09_bank_state	KIBS09 1 of 141
3	KI-09 -- Check Detail	KI_09_ck_detail	KICD09 1 of 43
5	KI-09 --Financials	KI_09_financials	KIF09 1 of 2
5	KI -09 --General Ledger	KI_09_general_ledger	KIGL09 1 of 11
5	KI-09 --Proof Ledger Receipts	KI_09_proof_ledger_re ceipt	KIPR09 1 of 5
7, 26	EIN -- 04 Receipts	EIN.KI_04_receipts	EIN.KI04R 1 of 227
7, 26	EIN -- 07 Receipts	EIN.KI_07_receipts	EIN.KI07R 1 of 44
7, 26	EIN -- 08 Receipts	EIN.KI_08_receipts	EIN.KI08R 1 of 333

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
1	EIN and KI 07 Tax Returns	EIN_07_tax_returns	EIN.KI07 1 of 11
2,3	EIN -- Bank Statements & check detail	EIN_07- 9_bank_sta_ck_detail	EIN07-9BSCD 1 of 134
3	EIN-07 -- Checks	EIN_07-9_checks	EIN07-9C 1 of 4
4	EIN-07 -- Deposits	EIN_07-9_deposits	EIN07-9D 1 of 4
5	EIN-07 -- Financials	EIN_07-9_financials	EIN07-9F 1 of 6
5	EIN-07 -- General Ledger	EIN_07- 9_general_ledger	EIN07-9GL 1 of 22
5	KI-07 -- Accounts Payable	KI_07- 9_accounts_payable	KI07-9AP 1 of 13
2	KI-07 -- Bank Records	KI_07- 9_bank_records1	KI07-9BR 1 of 337
3	KI-07 -- Check Detail	KI_07- 9_ck_detail_proof_reg	KI07-9CDPR 1 of 8
5	KI-07 -- Check Reconciliation Detail	KI_07- 9_ck_detail_reconcliat ion	KI07-9CDR 1 of 114
5	KI-07 -- Financials	KI_07-9_financials	KI07-9F 1 of 6
5	KI-07 -- General Ledger	KI_07- 9_general_ledger	KI07-9GL 1 of 22
7, 26	KI-07 -- Receipts	KI_07_receipts	KI07R 1 of 57
3	KI -- Checks cashed by Hahn's Surplus	KI_ck_cshd_hahns	KICKHS <<1>> of 125
5	KI_09_accounts_payable	Accounts Payable	KIAP09 1 of 15
2	KI_09_bank_state	Bank Statements	KIBS09 1 of 141
3	KI_09_ck_detail	Check Detail	KICD09 1 of 43
5	KI_09_financials	Financials	KIF09 1 of 2
5	KI_09_general_ledger	General Ledger	KIGL09 1 of 11
5	KI_09_proof_ledger_receipt	Proof Ledger Receipts	KIPR09 1 of 5
7, 26	EIN.KI_04_receipts	04 Receipts	EIN.KI04R 1 of 227
7, 26	EIN.KI_07_receipts	07 Receipts	EIN.KI07R 1 of 44
7, 26	EIN.KI_08_receipts	08 Receipts	EIN.KI08R 1 of 333
1	EIN_07_tax_returns	EIN and KI 07 Tax Returns	EIN.KI07 1 of 11
2	EIN_07-9_bank_sta_ck_detail		EIN07-9BSCD 1 of 134
3	EIN_07-9_checks		EIN07-9C 1 of 4
4	EIN_07-9_deposits		EIN07-9D 1 of 4
5	EIN_07-9_financials		EIN07-9F 1 of 6
5	EIN_07-9_general_ledger		EIN07-9GL 1 of 22
5	KI_07-9_accounts_payable		KI07-9AP 1 of 13
2	KI_07-9_bank_records1		KI07-9BR 1 of 337
3	KI_07-9_ck_detail_proof_reg		KI07-9CDPR 1 of 8
3	KI_07-9_ck_detail_reconciliation		KI07-9CDR 1 of 114
5	KI_07-9_financials		KI07-9F 1 of 6
5	KI_07-9_general_ledger		KI07-9GL 1 of 22
7, 26	KI_07_receipts		KI07R 1 of 57
3, 5, 2, 16	KI Quickbooks disc copy (Hand Delivered during Laurie Wright's Deposition)	NOT BATE STAMPED Quickbooks file	
3	KI_ck_cshd_hahns	Checks cashed by Hahn's Surplus	KICKHS <<1>> of 125

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
7, 26	KI-07 -- recelpts added -- 07 receipts for dick skoy	KI.DICKSKOY.RECEIPTS. 07	1 of 2
7, 26, 8	KI-07 -- SIMSHOUSER NOTES 04-08	KI.LOAN.BS.04-08	1 OF 6
7, 26	KI-07 -- SOLAR & RIG RECEIPTS 07	KI.BofS.SOLAR.07	1 OF 2
7, 26	KI-07 -- WALT RECEIPTS PAID IN 00	KI.WALT.RECEIPTS 07	1 OF 30
14, 24	KI ISSUED CERTIFICATES	NOT BATE STAMPED (WORD DOCUMENTS)	
14, 24	KI TRANSFER RECORDS	NOT BATE STAMPED (WORD DOCUMENTS)	
14	KI STOCKHOLDERS	NOT BATE STAMPED PDF FILE	

EXHIBIT B

Exhibit 5

Jennifer L. Taylor

From: Patrick C. Clary [patclary@patclarylaw.com]
Sent: Wednesday, April 28, 2010 6:23 PM
To: Jennifer L. Taylor
Subject: Burke, et al. v. Hahn, et al.

See copy of letter attached.

Sincerely,
Pat Clary
Law Offices of Patrick C. Clary, Chartered
7201 W. Lake Mead Blvd., Suite 410
Las Vegas, Nevada 89128
702.382.0813/702.382.7277FAX

CONFIDENTIALITY NOTICE: This e-mail transmission (and/or the attachments accompanying it) contains confidential information belonging to the sender. The information is intended only for the use of the intended recipient. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. Furthermore, any unauthorized interception of this transmission is prohibited. If you have received this transmission in error, please notify the sender by reply e-mail, and then destroy all copies of this transmission.

5/26/2010

Law Offices of
Patrick C. Clary, Chartered
A Professional Corporation
CITY CENTER WEST, SUITE 410
7201 WEST LAKE MEAD BOULEVARD
LAS VEGAS, NEVADA 89128

Telephone: 702.382.0813
Fax: 702.382.7277
email: patclary@patclarylaw.com
www.patclarylaw.com

April 28, 2010

Branch Office
543 Plumas Street
Reno, Nevada 89509
Telephone: 775.348.0099
Fax: 775.348.1738

Email: jltaylor@rvcdlaw.com
& Original by Regular Mail

Jennifer L. Taylor, Esq.
Robertson & Vick, LLP
401 North Buffalo Drive, Suite 202
Las Vegas, Nevada 89145

Re: Burke, et al. v. Hahn, et al.

Dear Jennifer:

In preparing for the deposition on Friday, it occurred to me that, while we have provided the corporate documents of Kokoweef, Inc. on numerous occasions, because I do not recall the last date that any corporate documents were produced, there may be some minutes of corporate meetings that you do not have.

Accordingly, if you will provide me early tomorrow with a list of the minutes that you do have assembled, I will provide you copies of the minutes that you apparently do not have immediately after receiving your list.

Sincerely yours,



Patrick C. Clary

PCC:bhc
cc: M Nelson Segel, Esq.

Exhibit 6

Robertson & Vick LLP

Attorneys at Law

401 N. Buffalo Dr, Suite 202

Las Vegas, Nevada 89145

Telephone (702) 247-4661 • Fax (702) 247-6227

website: www.rvcdlaw.com

April 29, 2010

VIA FACSIMILE and EMAIL

Patrick C. Clary

Law Offices of Patrick C. Clary, Chtd.

7201 West Lake Mead Boulevard, Suite 410

Las Vegas, Nevada 89128

Re: Burke, et al. v. Hahn, et al.
District Court Case No. A558629
Our File No.: 5081.01

Dear Pat:

I am in receipt of your letter of last night regarding the production of corporate minutes. Corporate minutes were one of the items listed in Plaintiffs' Request for Production No. 15. Accordingly, I would have expected that all corporate minutes would have been produced and delineated as part of your response to Request No. 15. After reviewing the index attached to Kokoweef's Responses to Plaintiffs' Request for Production and Kokoweef's prior document disclosures, it appears that no corporate minutes have ever been produced by Kokoweef pursuant to NRCP 16.1, NRCP 34, or Judge Gonzales' Order on Plaintiffs' Motion to Compel.

Despite Kokoweef's failure to comply with NRCP 16.1, NRCP 34, or Judge Gonzales' Order on Plaintiffs' Motion to Compel in regard to corporate minutes as requested in Plaintiffs' Request for Production No. 15, I discussed with my clients the extent to which they may have corporate minutes. I am informed that they have no corporate minutes dated after August 2007.

LOS ANGELES

LAS VEGAS

ALBUQUERQUE

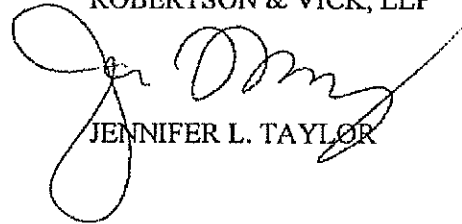
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Patrick C. Clary
April 29, 2010
Page 2

Therefore, please formally supplement your Responses to Requests for Production, as required by NRCP 16.1, with a complete set of corporate minutes dated August 2007, and beyond.

Very truly yours,

ROBERTSON & VICK, LLP

A handwritten signature in black ink, appearing to read "Jennifer L. Taylor", is written over the printed name. The signature is fluid and cursive, with a large loop at the end.

JENNIFER L. TAYLOR

JLT:sgj

cc: Nelson Segel, Esq.

Exhibit 7

Law Offices of
PATRICK C. CLARY, CHARTERED
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Tel: 702.382.0813 - Fax: 702.382-7277

1 SUPP

PATRICK C. CLARY, CHARTERED
Patrick C. Clary
Nevada Bar No. 00053
City Center West, Suite 503
7201 West Lake Mead Boulevard
Las Vegas, Nevada 89128
Telephone: 702.382.0813
FAX: 702.382-7277

6 Attorneys for so-called Nominal
Defendant Kokoweef, Inc. and
7 Defendant Patrick C. Clary

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 -oOo-

11 TED R. BURKE; MICHAEL R. and) CASE NO. A558629
LAURETTA L. KEHOE; JOHN BERTOLDO;) DEPT NO. XI
12 PAUL BARNARD; EDDY KRAVETZ; JACKIE)
& FRED KRAVETZ; STEVE FRANKS;)
13 PAULA MARIA BARNARD; PETE T. and)
LISA A. FREEMAN; LEON GOLDEN;)
14 C.A. MURFF; GERDA FERN BILLBE;) SUPPLEMENTAL RESPONSE TO
BOB and ROBYN TRESKA; MICHAEL) SO-CALLED NOMINAL DEFENDANT
15 RANDOLPH; and FREDERICK WILLIS,) KOKOWEEF, INC.'S RESPONSE TO
DOCUMENTS CONTAINED IN PLAIN-
16 Plaintiffs,) TIFF'S NOTICE OF DEPOSITION
Pursuant to NRCP 30(b)(6) OF
17 vs.) THE CUSTODIAN AND KEEPER OF
RECORDS OF KOKOWEEF, INC.

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

23 Defendants,)

24 and)

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

28 Nominal Defendants.)

1 REQUEST NO. 15: Any business agreements, corporate documents,
2 organizational documents, articles of incorporation, by-laws, minutes,
3 joint venture agreements, operating agreements, partnership
4 agreements, limited liability company agreements, documents amending
5 any such documents, or other such similar documents or writings
6 pertaining to any type of organization.

7 SUPPLEMENTAL RESPONSE: Although voluminous corporate documents
8 were previously produced by So-called Nominal Defendant Kokoweef, Inc.
9 ("Kokoweef"), upon inquiry by the undersigned counsel to the Plaintiff
10 counsel of what copies minutes of Kokoweef corporate minutes the
11 Plaintiffs' possess (especially given that Plaintiff Ted R. Burke was
12 an officer and director of Kokoweef until March 26, 2008), the
13 Plaintiff's counsel replied that she and her clients "have no
14 corporate minutes dated after July 2007" and requested that "a
15 complete set of corporate minutes dated August 2007, and beyond" be
16 produced; accordingly, copies of all such corporate minutes and
17 written consents in lieu of minutes are hereby produced as Exhibit A
18 attached hereto.

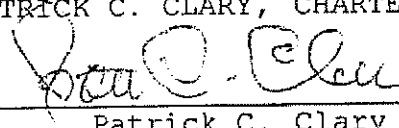
19 REQUEST NO. 24: All shareholder ledgers, stock certificates, and
20 any other information delineating the number of shares sold, the
21 identity of shareholders, the amounts paid for the same, and the
22 current value of the shares.

23 SUPPLEMENTAL RESPONSE: While all such documents were produced at
24 Kokoweef's office located at 2908 East Lake Mead Blvd., North Las
25 Vegas, Nevada, on April 16, 19, 20, and 21, 2010, and scanned there
26 (although copies the electronic discs thereof which were supposed to
27 be provided to the Defendants' counsel have not been received to date)
28 except for the stockholders' file for Peter and Lisa Freeman, which

1 was inadvertently located in the undersigned counsel's office and just
2 discovered, copies of the entire content of which are hereby produced
3 as Exhibit B attached hereto.

4 DATED: April 29, 2010.

5 PATRICK C. CLARY, CHARTERED

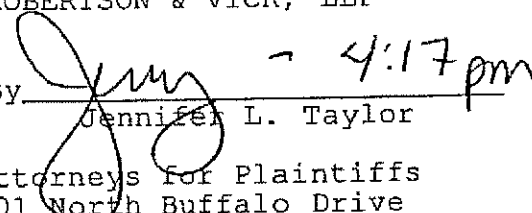
6 By 
7 Patrick C. Clary

8 Attorneys for so-called Nominal
9 Defendant Kokoweef, Inc. and
10 Defendant Patrick C. Clary

11 ACKNOWLEDGMENT OF SERVICE

12 Receipt of the above and foregoing Supplemental Response to So-
13 called Nominal Defendant Kokoweef, Inc.'s Response to Request for
14 Production of Documents Contained in Plaintiffs' Notice of Deposition
15 Pursuant to NRCP 30(b)(6) of the Custodian and Keeper of Records of
16 Kokoweef, Inc., together with Exhibits A and B thereto, is hereby
17 acknowledged on this 29th day of April, 2010.

18 ROBERTSON & VICK, LLP

19 By  - 4:17 pm
20 Jennifer L. Taylor

21 Attorneys for Plaintiffs
22 401 North Buffalo Drive
23 Suite 202
24 Las Vegas, Nevada 89145

25 M NELSON SEGEL, CHARTERED

26 By _____
27 M Nelson Segel

28 Attorneys for Defendant
Larry L. Hahn and Hahn's
World of Surplus, Inc.
624 North 9th Street
Las Vegas, Nevada 89101

Law Offices of
PATRICK C. CLARY, CHARTERED
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Tel: 702.382.0813 - Fax: 702.382-7277

Law Offices of
PATRICK C. CLARY, CHARTERED
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Tel: 702.382.0813 - Fax: 702.382-7277

1 was inadvertently located in the undersigned counsel's office and just
2 discovered, copies of the entire content of which are hereby produced
3 as Exhibit B attached hereto.

4 DATED: April 29, 2010.

5 PATRICK C. CLARY, CHARTERED

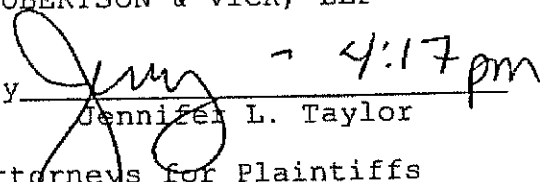
6 By 
7 Patrick C. Clary

8 Attorneys for so-called Nominal
9 Defendant Kokoweef, Inc. and
Defendant Patrick C. Clary

10 ACKNOWLEDGMENT OF SERVICE

11 Receipt of the above and foregoing Supplemental Response to So-
12 called Nominal Defendant Kokoweef, Inc.'s Response to Request for
13 Production of Documents Contained in Plaintiffs' Notice of Deposition
14 Pursuant to NRCP 30(b)(6) of the Custodian and Keeper of Records of
15 Kokoweef, Inc., together with Exhibits A and B thereto, is hereby
16 acknowledged on this 29th day of April, 2010.

17 ROBERTSON & VICK, LLP

18 By  - 4:17 pm
19 Jennifer L. Taylor

20 Attorneys for Plaintiffs
21 401 North Buffalo Drive
Suite 202
22 Las Vegas, Nevada 89145

23 M NELSON SEGEL, CHARTERED

24 By _____
25 M Nelson Segel

26 Attorneys for Defendant
27 Larry L. Hahn and Hahn's
World of Surplus, Inc.
28 624 North 9th Street
Las Vegas, Nevada 89101

Exhibit 8

Robertson & Vick LLP

Attorneys at Law

401 N. Buffalo Dr, Suite 202

Las Vegas, Nevada 89145

Telephone (702) 247-4661 • Fax (702) 247-6227

website: www.rvcdlaw.com

April 30, 2010

Via United States Mail, Electronic Mail and Facsimile:

Patrick C. Clary

Law Offices of Patrick C. Clary, Chtd.

Clary Gibson Lowry LLP

7201 West Lake Mead Boulevard, Suite 410

Las Vegas, Nevada 89128

Facsimile: (702) 382-7277

Re: **Burke, et al. v. Hahn, et al.**

District Court Case No. A558629

Our File No.: 5081.01

Compliance with Court Order regarding Motion to Compel

Dear Mr. Clary:

Thank you for your Supplemental Response to Plaintiffs' Requests for Production (the "Supplement"), which was hand-delivered to our office at 4:17pm yesterday afternoon. The Supplement provides documents and written responses to Request Nos. 15 and 24. However, this Supplement still does not cure the deficiencies outlined in our letter of yesterday.

For example, your response to Request No. 15 claims that "voluminous corporate documents were previously produced" by Kokoweef. However, neither your April 14, 2010 Responses to Plaintiffs Requests for Production, nor the Supplement provide copies of these "voluminous corporate documents", as detailed in Request No. 15. The evasive and incomplete responses in your Supplement, along with the entirety of the evasive and incomplete responses in your April 14, 2010 Responses, which we outlined yesterday, compels us to again request Kokoweef properly supplement its April 14, 2010 Responses, and the newly received

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LAS VEGAS

ALBUQUERQUE

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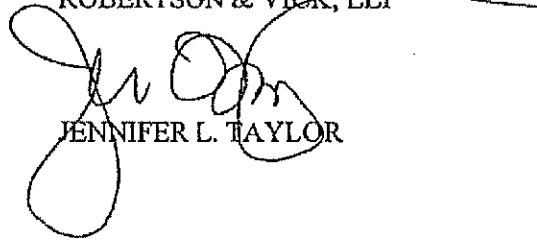
Patrick C. Clary
April 30, 2010
Page 2

Supplement, in accordance with NRCP 16.1, NRCP 34 and Judge Gonzales' Order no later than May 10, 2010. If you fail to do so by May 10, 2010, we will request Judge Gonzales' issue an Order to Show Cause regarding Kokoweef's continued non-compliance.

Thank you in advance for your time and prompt attention to this matter.

Very truly yours,

ROBERTSON & VICK, LLP

A handwritten signature in black ink, appearing to read "Jennifer L. Taylor", is written over the printed name. The signature is fluid and cursive, with a long horizontal line extending to the right.

JENNIFER L. TAYLOR

cc: Nelson Segel

JLT:sjg

Exhibit 9

Law Offices of
PATRICK C. CLARY, CHARTERED
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1 PATRICK C. CLARY, CHARTERED
Patrick C. Clary
2 Nevada Bar No. 00053
City Center West, Suite 503
3 7201 West Lake Mead Boulevard
Las Vegas, Nevada 89128
4 Telephone: 702.382.0813
FAX: 702.382-7277

5 Attorneys for so-called Nominal
6 Defendant Kokoweef, Inc. and
Defendant Patrick C. Clary
7

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 -o-o-

11 TED R. BURKE; MICHAEL R. and)
LAURETTA L. KEHOE; JOHN BERTOLDO;)
12 PAUL BARNARD; EDDY KRAVETZ; JACKIE)
& 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)
15 RANDOLPH; and FREDERICK WILLIS,)

16 Plaintiffs,)

17 vs.)

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

23 Defendants,)

24 and)

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

28 Nominal Defendants.)

FILE # 5081.01
INDEX: YES _____ NO _____
CALENDAR:
DATE 1 _____
DATE 2 _____
BY _____
FILED BY _____
ROUTED TO _____

CASE NO. A558629
DEPT NO. XIII

DEFENDANTS KOKOWEEF, INC.'S
PATRICK C. CLARY'S LIST
OF DOCUMENTS AND WITNESSES

1 So-called Nominal Defendant Kokoweef, Inc. and Defendant Patrick
2 C. Clary hereby set forth their list of documents and witnesses
3 pursuant to Rule 16,1 of the Nevada Rules of Civil Procedure.

4 I.

5 DOCUMENTS

6 1. Amended Answer of Defendant Patrick C. Clary filed March 16,
7 2009;

8 2. Amended Answer of So-called Nominal Defendant Kokoweef, Inc.
9 Filed March 16, 2009;

10 3. Books and records of Explorations Incorporated of Nevada;

11 4. Books and records of Kokoweef, Inc.;

12 5. Exhibits offered and received into evidence at the Evidentiary
13 Hearing held herein on July 30, 2008;

14 6. Mayan Gold letter dated March 27, 2007 with exhibits;

15 7. Documents filed with the Securities Division of the office of
16 the Secretary of State of the State of Nevada in Las Vegas, Nevada;

17 So-called Nominal Defendant Kokoweef, Inc. and Defendant Patrick
18 C. Clary reserve (1) the right to utilize any document identified by
19 the Plaintiffs or presented at the trial of the above-captioned case
20 and (2) the right to supplement this document as they become aware of
21 further documents.

22 II.

23 WITNESSES

24 1. All witnesses designated in Defendants Larry L. Hahn and
25 Hahn's World of Surplus, Inc.'s List of Documents and Witnesses
26 Pursuant to NRCP 16.1;

27 3. Carol Chervenak, whose address is P. O. Box 34993, Las Vegas,
28 Nevada 89133, and who will testify to the facts and circumstances

1 circumstances surrounding or related to the allegations contained in
2 the pleadings herein;

3 3. Richard Dutchik, whose address is 812 Coral Springs Street,
4 Suntree, Florida, 32940 and who will testify to the facts and
5 circumstances surrounding or related to the allegations contained in
6 the pleadings herein;

7 4. Van G. Hewitt, whose address is 8156 S. 535 E., Sandy, Utah
8 84070, and who will testify to the facts and circumstances surrounding
9 or related to the allegations contained in the pleadings herein;

10 5. Michael Mackey, whose address is 326 Main Street, East
11 Randolph, New York 14730, and who will testify to the facts and
12 circumstances surrounding or related to the allegations contained in
13 the pleadings herein;

14 6. Richard Renel, whose address is 4125 North Torrey Pines Drive,
15 Las Vegas, Nevada 89108, and who will testify to the facts and
16 circumstances surrounding or related to the allegations contained in
17 the pleadings herein;

18 7. James Serrill, whose address is 8501 Del Webb Blvd., #240-B,
19 Las Vegas, Nevada 89134-8677, and who will testify to the facts and
20 circumstances surrounding or related to the allegations contained in
21 the pleadings herein;

22 8. Larry Voss, whose address is 6641 Painted Desert Drive, Las
23 Vegas, Nevada 89108, and who will testify to the facts and
24 circumstances surrounding or related to the allegations contained in
25 the pleadings herein.

26 So-called Nominal Defendant Kokoweef, Inc. and Defendant Patrick
27 C. Clary reserve (1) the right to call any witnesses identified or
28 utilized by the Plaintiffs or the other Defendant herein and (2) the

Law Offices of
PATRICK C. CLARY, CHARTERED
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Tel: 702.382.0813 - Fax: 702.382-7277

1 right to supplement this list of witnesses as additional individual
2 become known.

3 PATRICK C. CLARY, CHARTERED

4
5 By


Patrick C. Clary

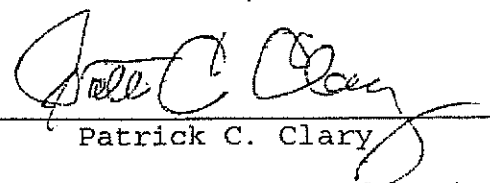
6
7 Attorneys for so-called Nominal
8 Defendant Kokoweef, Inc. and
9 Defendant Patrick C. Clary

10 CERTIFICATE OF SERVICE BY MAILING

11 The above and foregoing Defendants Kokoweef, Inc.'s and Patrick
12 C. Clary's List of Documents and Witnesses was served on the
13 Plaintiffs by mailing a copy thereof, first-class postage prepaid, to
14 their attorneys, Robertson & Vick, LLP, 401 North Buffalo Drive, Suite
15 202, Las Vegas, Nevada 89145, and was served on Defendants Larry Hahn
16 and Hahn's World of Surplus, Inc. by mailing a copy thereof, first-
17 class postage prepaid, to their attorney, M Nelson Segel, Esq., M
18 Nelson Segel, Chartered, 624 South 9th Street, Las Vegas, Nevada
19 89101, on April 20, 2009.

20 PATRICK C. CLARY, CHARTERED

21 By


Patrick C. Clary

22 Attorneys for so-called Nominal
23 Defendant Kokoweef, Inc. and
24 Defendant Patrick C. Clary
25
26
27
28

Exhibit 10

Robertson & Vick LLP

Attorneys at Law

401 N. Buffalo Dr, Suite 202
Las Vegas, Nevada 89145
Telephone (702) 247-4661 • Fax (702) 247-6227
website: www.rvcdlaw.com

April 29, 2010

Via United States Mail, Electronic Mail and Facsimile:

Patrick C. Clary
Law Offices of Patrick C. Clary, Chtd.
Clary Gibson Lowry LLP
7201 West Lake Mead Boulevard, Suite 410
Las Vegas, Nevada 89128
Facsimile: (702) 382-7277

Nelson M. Segel, Esq.
624 S. 9th Street
Las Vegas, Nevada 89101
Facsimile: (702) 382-2967

Re: **Burke, et al. v. Hahn, et al.**
District Court Case No. A558629
Our File No.: 5081.01
Compliance with Court Order regarding Motion to Compel

Dear Messrs. Clary and Segel:

You and your client have still failed to fully comply with Judge Gonzales' Order granting Plaintiffs' Motion to Compel further production of documents. Your Responses to Plaintiffs' Request for Production are evasive and incomplete, your production of documents is incomplete, and last night Mr. Clary faxed me a letter, after hours, stating it had just "occurred" to him that Kokoweef had failed to produce all of its corporate minutes. Further, our clients have just incurred substantial costs to copy more than 19,000 records at Kokoweef's office over the past few weeks, and for you to suddenly recall that you failed to produce all of the relevant records, twenty four (24) hours before the deposition of your client's custodian of records, is inexcusable. As such, we will not be going forward with the deposition scheduled for tomorrow, April 30, 2010, as it would be a further waste of our time and our clients' money. Once Kokoweef has

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fully complied with the Court's Order, we will re-notice this deposition so that it can be completed in one session, and with all of the court-ordered documents.

Therefore, we are requesting that Kokoweef properly comply with NRCP 16.1, NRCP 34 and Judge Gonzales' Order no later than May 10, 2010. Should you and your client fail to comply, we will be forced to file a request for an Order to Show Cause why Kokoweef should not be held in contempt of Judge Gonzales' Order Granting Plaintiffs' Motion to Compel.

The specifics of Kokoweef's non-compliance follows. Kokoweef has failed to produce documents responsive to Plaintiffs' Requests for Production of Documents that exist at the Kokoweef office and that were either identified during the deposition of Laurie Wright or identified during the onsite inspection and copying of documents allegedly responsive to Req. No. 24. This belief is confirmed by your letter of April 28, 2010, sent after 6:00 p.m., stating that Kokoweef had not produced its corporate minutes.

Additionally, in reviewing Kokoweef's Responses to Plaintiffs' Requests for Production of Documents (the "Responses"), including the Kokoweef Directory of Documents Produced (the "Directory"), it appears that:

- 1) documents identified in the Directory have not been produced;
- 2) documents previously produced with bates-numbers have not been listed in the Directory; or
- 3) that documents previously dumped on Plaintiffs have neither been bates-stamped nor identified as responsive to each of Plaintiffs' Requests for Production as required by NRCP 34.

In analyzing the Responses and the Directory, we reviewed the following:

- 1) A disc titled as "Kokoweef Inc. Taylor Copy, 7-2009, COR" (the "July disc");
- 2) A disc titled "Kokoweef Inc. Files - Copy for Jennifer L. Taylor, 10-2009, included: KI 09 Paperwork, Receipts, KI 08 Tax Return, KI Fixed Asset Report, Other Tax Information" (the "October disc");
- 3) The Quick Books disc produced to counsel for Plaintiffs on October 5, 2009; and
- 4) A disc titled "KI Files 4-12-10, Paid in 07 Receipts, Added, KI Info: Certs, Transfers, Shareholders" (the "April disc");
- 5) The NRCP 16.1 Disclosures by all Defendants.
- 6) Unidentified documents in a series of six binders which are not organized in any way to comply with the Court's Order or respond to Plaintiffs'

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Requests for Production, and which have no bates-stamps or other identifying documents, no custodian of records affidavit or other document indicating authenticity, and no pleading containing the signature of any counsel accompanies these documents;

**The Responses remain incomplete, and documents identified
in the Directory have not been produced**

The Responses remain significantly incomplete, and in comparing the Responses and the Directory, it is patently clear that documents have not been produced.

For example, in regard to Response No. 15, which was the subject of correspondence earlier today, Kokoweef responds:

“There are no joint venture agreements, operating agreements, partnership agreements, limited liability company agreements known to exist. See Response to Request No. 1 above.”

When you look at Response to Request No. 1, it states:

“All requested documents have been heretofore produced and delivered to the Plaintiffs’ attorney and, except for the 2008 Return, are identified in the Directory of Documents Produced (the “Directory”) attached hereto as Exhibit A and incorporated herein by this reference.”

When you refer to the Directory, there is nothing in the “Matches Request #” column for Request No. 15, and the only item which is delineated as “Matches Request #” for Request No. 1 is “EIN_07_tax_returns”, which is not responsive to Request No. 15, which sought:

“Any business agreements, corporate documents, organizations documents, articles of incorporation, by-laws, minutes, joint venture agreements, operating agreements, partnership agreements, limited liability company agreements, documents amending any such documents, or other such similar documents or writings pertaining to any type of organization.”

This non-responsive cross-referencing is systemic in the Responses. As a further example, Req. No. 2 seeks, in summary, banking records. Kokoweef’s responses states:

“There were and are no savings accounts, money market accounts, time deposit accounts, retirement accounts, pension accounts, profits sharing accounts, stock

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purchase loan accounts, annuity accounts, stock accounts, bond accounts, ready assets accounts, mutual funds accounts, loan accounts or mortgage accounts. All other requested documents have previously been produced on computer discs heretofore delivered to Plaintiffs' attorneys and are identified in the Directory."

(Emphasis added). However, when you review the Directory, there is only one entry indicating "Matches Request #" 2 that has actually been produced on either the July, October or April discs. For your ease of reference, I have attached notes from our review of the Directory showing the scant number of documents that were actually "previously" produced on computer discs. Any documents identified in the July, October or April discs have been noted in handwriting.

The same deficiency exists in your Responses to Request Nos. 3, 4, 5, 7, 8, 18 and 20. The Response to Request No. 3 refers me back to the Response to Request No. 2. The Response to Request No. 4, refers me back to Request No. 3. The Response to Request No. 5 refers me back to Request No. 3. The Response to Req. No. 18 refers me to the Response to Req. No. 7. The Response to Req. Nos. 7 and 8 refer me to the Response to Req. No. 26, which refers me back to the Response to Req. No. 2, for which documents identified have not been produced. Similarly, the Response to Req. No. 20 refers me back to Req. No. 2. And, when I review the Directory, Kokoweef has only produced a scant number of the documents identified in the Directory as responsive to Request Nos. 2, 3-5, 7-8, 18, and 26.

Response to Request No. 13 is also non-compliant. It the response to Request No. 13, Kokoweef responds:

"All documents requested have been heretofore produced as set forth in Response No. 2 and are identified in the Directory. See also Responses to Request Nos. 14 and 24."

If I refer to the Directory, the only entry in the "Matches Request #" Column that refers to Req. No. 13 is the Mayan Gold correspondence. Are documents identified in the Response and Directory as responsive to Request No. 2 also, then, responsive to Request No. 13? If so, they have not been produced.

Kokoweef's Response to Req. No. 21 is similarly problematic. Kokoweef responds that "no documents exist", in regard to prepaid expenses for Kokoweef, "except with respect to payments relating to mining claims and insurance." Yet, no expenses related to mining claims and insurance are produced or referred to in the Directory.

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Further, Kokoweef's Responses to Req. Nos. 23 and 25 are also non-compliant. The Response to Req. No. 23 simply states, in regard to a request for production of mining claims, "All requested documents have been heretofore produced and delivered to the Plaintiffs' attorneys." Yet, the Response to Req. No. 23 doesn't even provide a reference to the Directory or to a bates-stamped document. The Response to Req. No. 25 presents the same issue of non-compliance. In response to a request for all documents related to the "Agreement and Plan of Reorganization", Kokoweef simply states: "All requested documents have been heretofore produced and delivered to the Plaintiffs' attorneys." However, there is no bates-stamp reference and no reference in the Directory.

Kokoweef has not complied with Request No. 14. As discussed throughout this letter, Plaintiffs are aware of several other "stockholder lists or ledgers outlining the name, address, phone number, and number of shares held for each stockholder from any time." Laurie Wright testified that her father kept a disc reflecting this information in his Hahn's World of Surplus office safe. Two additional lists were identified during the on-site copying at Kokoweef. Therefore, the Response is not accurate or compliant.

Further, as you are aware, Plaintiffs had to go on site at the Kokoweef office to obtain copies of these documents. Plaintiffs were made aware, for the first, time that Kokoweef's "time constraints" prevented production of these documents on April 13, 2010 at approximately 3:30pm. Plaintiffs' counsel are still reviewing the nearly 19,000 pages that they copied, at their sole expense. Had Kokoweef apprised Plaintiffs' that it intended to permit "inspection" and not produce these documents prior to the eve of the April 14, 2010 Court ordered production deadline, Plaintiffs' counsel could have obtained access to review these documents earlier. As it is, Plaintiffs' counsel are still reviewing these documents to determine if there are any deficiencies in the documents copied.

Additionally, in reviewing the documents produced, it does not appear that records from creditors, as delineated in Request No. 7, such as insurance providers and telephone companies, were produced. Our request requires that phone bills be produced, not only for Kokoweef and its predecessor in interest, EIN, but for those phones of Hahn's World of Surplus, Larry Hahn, Laurie Wright or any other persons or entities whose phones have been used for Kokoweef, and/or its predecessor in interest, EIN, from 2004 to present. No such documents have been produced in the Responses.

A significantly larger volume of documents were observed at the Kokoweef offices than have been produced to Plaintiffs

In spending three and a half days, between 4/16/01 and 4/21/10 at the Kokoweef offices, it appears that there are far more documents than have been produced. Since we were only

permitted on site to copy shareholder records, I did not even request inspection of the numerous binders, bound record books, envelopes and boxes of documents I observed in the office. Specifically, I observed the following in plain view at the Kokoweef offices:

I. A closet containing four long shelves along the main part of the closet, three smaller shelves at the back of the closet, and boxes stacked along the floor of the closet.

- a) Top shelf: 16 binders
 - 1) Co 1,2,3
 - 2) Co 4, 5
 - 3) Co 5 cont'd
 - 4) Co 5 cont'd
 - 5) Co 5 cont'd
 - 6) Co 5 cont'd
 - 7) Co 6
 - 8) Audit 2004 - 2007/US Bank Checks & Statements
 - 9) EIN, Inc. - Financials 05-06
 - 10) Exp. 2005-06
 - 11) Kokoweef 2005-06 (cont'd)
 - 12) Evidentiary Hearing - Checks, Receipts Paid Outs, Hahn's Surplus Checks Receipts 2003-2006
 - 13) Kokoweef, Inc. 07
 - 14) Explorations 11/07 - 06/09
 - 15) EIN/KI Receipts '09; Misc. George Owen '08
 - 16) EIN/KI Receipts '04, '08 ('07 covered up)

- b) Second shelf from top:
 - 1) Black notebook
 - 2) Dick's Stock Certificate Original Work Sheets
 - 3) Dick's Original Stock Certificate Work Sheets
 - 4) Complete Book of Corporate Forms
 - 5) Explorations of NV, Inc. 2003 - _____
 - 6) Explorations of NV, Inc. 2004
 - 7) Investors Total
 - 8) Paid outs - Audit Evidentiary Hearing 2003, 2004, 2005, 2006, 2007
 - 9) Summons March 2008 Audit
 - 10) Check & Receipts 2003 - 2004
 - 11) Book I
 - 12) Book 2

- 13) Minutes
- 14) Proxy - 3/26/08 - Remove-Burke-Keyhoe-Dut.
- 15) Proxies Audit June 2008
- 16) Proxy Aug 2007
- 17) Unlabeled Green file portfolio
- 18) Green cardboard folder - Proxies June '08
- 19) News Letters - '06, '07, '08
- 20) Proxy 09
- 21) Clear box - front sheet "2009 Board Election - 6/7/09"

c) Third Shelf from Top

- 1) Pat's pictures
- 2) Unlabeled folders
- 3) "Notice for Exploratory Drilling" - 7/10/00
- 4) Reference INU Explorations
- 5) Reference INU Data
- 6) Unlabeled Black Binder
- 7) "Kokoweef" - handwritten block letters
- 8) Manilla envelope - "Explorations, Inc. Stock Certificates"
- 9) Original Receipts - Explorations Checks 2005 2006
- 10) Law Suit 7-11-07 to 11-17-08
- 11) 2008 Lawsuit
- 12) Lawsuit '09
- 13) Lawsuit Nov. '08 - 2009
- 14) Kokoweef 2008
- 15) Kokoweef 2009
- 16) 3 plastic baskets:
 - bottom basket - write;
 - middle - blue w/red folders - "financial report";
 - top-white "to be filed"
- 17) Stacker divider w/ folders in 3 sections
 - front - picture of boxes with envelopes in it.

d) Bottom Shelf

- 1) Black binder - unlabeled
- 2) Blue binder - "T650 Drill"
- 3) Stacks of paper, unidentifiable, below
- 4) 2 bound books - one green, one burgundy, one box top full of unidentifiable papers
- 5) Black binder unlabeled

- 6) Carhartt binder
- 7) Metal stackers with folders: Assayer/Consultant, Roger J. Smid; -
Green "Minutes-Letter & Articles"

e) Boxes on floor of Closet -

Left to right: Column 1

- 1) Top - Larry's Map Box - open box top - loose maps
- 2) Middle - "Paid Misc. Mine Receipts 2000, 01, 02, 03, 2004, 05,
06"
- 3) Bottom - L Tools -

Column 2:

- 1) Top - Kokoweef Financials & Bank 2004
- 2) Bottom - Old Extra News Letters
- 3) Mine Claims
- 4) Misc. Paid Receipts - Kokoweef & Check Stubs thru 2005
- 5) Explorations Financials & Banks - 2003 - 2007
- 6) Mine Bank Statements - 2003, 2004, 2005, 2006

Two Boxes next to shelf

- 1) Bottom - Blue plastic box
- 2) Unlabeled Box

Box - at back of closet with Binders & Books, including
- "Of men and gold"
- "Descent Team"

f) Shelves at back of closet

- 1) Bottom Shelf: Box with apparently dozens of manilla folders with
green post it notes identifying the contents. Examples of plainly
visible post-it notes include: 2006, 2004, 1980, 1/00 - 12/00, 2000,
2001, Jan - Dec. 2001, 2002, Dec. 2006
- 2) Left of closet (back to door)

II. File Cabinets:

- a) Brown vertical file cabinet - Four drawers
- b) Yellow vertical file cabinet - Four drawers containing shareholder records
identified as 1- 1049
- c) Blue two-drawer lateral file cabinet:
- top drawer unlabeled

– bottom drawer containing additional shareholder records and labeled as
“1101 - 1300”

III. Shelf above desk located next to lateral file cabinet:

- a) Five (5) binders each denoted as “Stock Certificates and Ledgers”.

Additionally, as you are aware, the shareholder records that we copied on site were identified by numbers tabbed on the side of the folders. Wanda, who was supervising the onsite copying, volunteered that there were spread sheets that cross-referenced shareholders by name and by file number. She asked if I wanted a copy and I said that I would discuss it with you. I am requesting, therefore, a copy of these records as they are responsive to Request Nos. 14 and 24. They were kept on the desk below the shelves with the 5 binders denoted as “stock certificates and ledger”.

Documents identified during the deposition of Laurie Wright or set out in Plaintiffs’
Requests for Production have not been produced

In reviewing the documents produced with your disk, there are still documents that were identified by your PMK in October which have still not been produced. For example, Laurie Wright testified that there was a box of original receipts that were not “readable” and therefore not been produced. Additionally, in your prior productions, there are receipts that have been folded over or otherwise physically altered so that they have become unreadable. We, therefore, request that the original receipts, as stored in the ordinary course of business, and as described by Laurie Wright, be produced. Again, if that means that you produce a box of receipts you claim to be “unreadable”, so be it. If you are uncomfortable producing these records to us, my suggestion, again, is that they be stored at a document depository such as Litigation Services and Technology. Again, this request is for Kokoweef, as defined in our Requests for Production of Documents, which includes its predecessor in interest, EIN.

Further, Laurie Wright testified that she had not been asked to scan documents for a while, yet, none of the documents produced as part of the April disc or identified in the Directory post date her deposition of more than 6 months ago. Additionally, it does not appear that the documents produced on the April disc or identified in the Directory fill in gaps from last documents produced.

Additionally, during her testimony, Laurie Wright testified that there were numerous documents in a safe in the office of Larry Hahn that is actually part of the Hahn’s World of Surplus. She testified that documents in that safe included “proof journals” and various computer disks, including disks of share holder records. Wright Dep. 118-120. It does not appear that these documents or disks were produced. Further, while reviewing the documents

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shareholder documents, at least two of the records, folders numbered 447 and 459 had handwritten notes indicating: "paper work in safe." Therefore, it is clear that not all documents were produced or even made available for inspection.

Finally, your response to Request No. 14 states: "All documents in response to this Request which are hereby produced on the New Disc and are also identified in the Directory". However, as noted above, there are at least two other stockholder lists or ledgers outlining the shareholder located in Kokoweef's offices, and at least one disc of information located in Larry Hahn's office safe, as testified to by your PMK. Therefore, Plaintiffs' request that the Responses be properly supplemented and these additional documents produced.

**Documents previously produced in the April or October Discs have
not been listed in the Directory**

In reviewing the April and October discs, the following documents, which had been produced on those discs, were not identified in the Responses or the Directory.

- EINBR 1 of 253
- KIBS 1 of 550
- KICD 1 of 95
- EINCD 1 of 170
- DD 1 of 38
- EINF 1 of 42
- Invoices 1 of 7
- KIF 1 of 32
- Misc. 1 of 5
- EINRJ 1 of 86
- KI Rec 05 1 of 16
- EIN Citi CC 1 of 28
- KIC CUS 1 of 32
- KI Rev 2 of 8
- KI Rec 1 of 74
- KI Rec 07 1 of 54
- FA 1 of 3

Does this mean that none of these documents respond to any of the Requests? If that is the case, please let us know. If not, Kokoweef's Responses need to be supplemented to include these documents.

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**Documents have not been bates-stamped nor identified as responsive to a particular
Request for Production**

As noted above, in reviewing documents from this litigation, there are numerous binders of unauthenticated, unidentified documents that appear to be Kokoweef or EIN records. However, they have no bates-stamps and have not been identified in any NRCP 16.1 disclosure of Kokoweef's Directory as set forth in the Responses. Yet, on several Responses, Kokoweef continues to assert that all documents have been produced, with no other reference to a specific document. Such a simplistic assertion runs afoul of NRCP 34 and Judge Gonzales' Order. Any document that Kokoweef believes is responsive to one of Plaintiffs' Requests must be identified in the Responses.

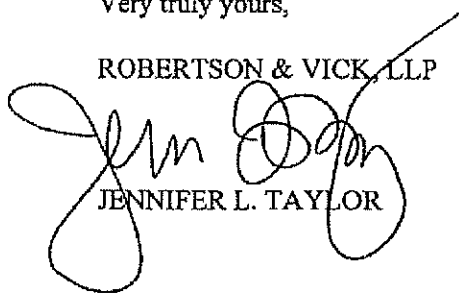
Further, the Stock Certificates identified as "KI Issued Certificates" produced on the April disc are not bates-stamped, and are produced in such a way as to provide no information at all as to the number of pages in each document. This dumping of documents on the April disc provides no way to subsequently identify them or ensure that a complete set has been produced.

As noted above, as a result of this non-compliance, Plaintiffs have no choice but to vacate tomorrow's deposition until such time as Kokoweef has fully complied with the Court's Order. In the event that Kokoweef does not properly supplement its Responses by May 10, 2010 to comply with NRCP 16.1, NRCP 34 and Judge Gonzales' Order, Plaintiffs will be forced to seek an Order to Show Cause on this continued non-compliance.

Thank you in advance for your time and prompt attention to this matter.

Very truly yours,

ROBERTSON & VICK, LLP

A handwritten signature in black ink, appearing to read "Jennifer L. Taylor", is written over the printed name. The signature is stylized with large loops and a long horizontal stroke extending to the left.

JENNIFER L. TAYLOR

JLT:sjg
Enclosure

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '07 NONCONSECUTIVE) CREDIT CARD #4991	EIN-BC 1 of 100	PL000001 to PL 000100
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '04 NONCONSECUTIVE) CREDIT CARD #4991 & #9325	EIN-BC 1 of 91	PL000101 to PL 000191
2	US Bank Corporate Credit Card (Kokoweef Card, '04-'08, NONCONSECUTIVE) CREDIT CARD #3683	EIN-BUS 1 of 43	PL000192 to PL000232
2	American Express Corporate Credit Card #62007 & #71005, NONCONSECUTIVE	EIN-BAMEX 1 of 100	PL000235 to PL000333
2	American Express Corporate Credit Card #62007, NONCONSECUTIVE, '03 TO '04	EIN-BAMEX2 1 of 100	PL000335 to PL000433
2	American Express Corporate Credit Card #62007 & #63005, NONCONSECUTIVE, '04 to '05	EIN-BAMEX3 1 of 100	PL000435 to PL000533
2	American Express Corporate Credit Card #63005, NONCONSECUTIVE, '05 to '07	EIN-BAMEX4 1 of 89	PL000535 to PL000623
2	US Bank Bank Statement (Explorations, '02-'09, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS 1 of 100	PL000624 to PL000723
2	US Bank Bank Statement (Explorations, '06-'08, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS3 1 of 100	PL000724 to PL000823
2	US Bank Bank Statement (Kokoweef & Explorations, '06-'09, NONCONSECUTIVE) CREDIT CARD EIN/#4121 & KI/#3683	EIN-BUS4 1 of 100	PL000824 to PL000923
3	Investor checks and money orders to EIN and KI, '02 to '03	EIN-CK 1	PL002485 TO PL002584
3	Investor checks and money orders to EIN and KI, '04	EIN-CK2 1 of 100	PL003685 TO PL003784
2, 3	Investor checks and money orders to EIN and KI, '03 to '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK3 1 of 100	PL003085 TO PL003184
2, 3	Investor checks and money orders to EIN and KI, '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK4 1 of 100	PL003285 TO PL003384
3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK5 1 of 100	PL004085 TO PL004184
2, 3	Investor checks and money orders to EIN, '04 & '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK6 1 of 100	PL003785 TO PL003884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK7 1 of 100	PL004184 TO PL004284
2, 3	Investor checks and money orders to EIN, '02, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK9 1 of 100	PL002484 TO PL002385
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK8 1 of 100	PL003985 TO PL004084
2, 3	Investor checks and money orders to EIN, '03 & '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK10 1 of 100	PL002985 TO PL003084
3	Investor checks and money orders to EIN, '03, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK11 1 of 100	PL002785 TO PL002884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK12 1 of 100	PL004285 TO PL004384
2, 3	Investor checks and money orders to EIN, '05 & '06, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK13 1 of 100	PL004485 TO PL004584
	Hahn's Surplus Payroll Account '03	HS-US 1 of 100	PL001085 TO PL001184
2, 3, 7, 26	Kokoweef Payouts '06 to '09 & Investor checks and money orders to KI, '07, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	KI-CK2 1-100	PL005285 TO PL005384
	Kokoweef Payouts '06 to '09, NONCONSECUTIVE	KI-CK3 1-100	PL004585 TO PL004684
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK7 1-100	PL005085 TO PL005184
3	Kokoweef Deposit Slips & Investor checks and money orders to KI '07 to '08, NONCONSECUTIVE	KI-USD1 1-100	PL005385 TO PL005484

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK8 1-100	PL005185 TO PL005284
7, 26	Kokoweef Payouts '07, NONCONSECUTIVE	KI-CK6 1-100	PL004985 TO PL005084
7, 26	Kokoweef Payouts KI '07, NONCONSECUTIVE	KI-CK5 1-100	PL004785 TO PL004884
7, 26	Kokoweef Payouts EIN'06, NONCONSECUTIVE	EIN_CK29 1 of 100	PL001885 TO PL001984
3, 7, 26	Kokoweef Payouts EIN'06, Investor checks and money orders to EIN '02 to '09, NONCONSECUTIVE	EIN_CK30 1 of 100	PL001985 TO PL002084
3	Investor checks and money orders to EIN & KI '04 to '06, and Deposit slips, NONCONSECUTIVE	KICK1 1 of 87	PL005485 TO PL005571
3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EINUS1 1 of 100	PL002185 TO PL002284
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS2 1 of 100	PL003385 TO PL003484
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS3 1 of 100	PL003485 TO PL003584
2	US Bank Statements for Kokoweef '05 to '06, NONCONSECUTIVE	KI-US53 1 of 61	PL001026 TO PL001084
2	US Bank Statements for Kokoweef '06 TO '08, NONCONSECUTIVE	KI-US52 1 of 61	PL000924 TO PL001023
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-US4 1 of 100	PL003485 TO PL003584
	Kokoweef Payouts '07	KI-CK4 1 of 100	PL004685 TO PL004784
2	US Bank Statements for Kokoweef & Exploration'04 TO '09, NONCONSECUTIVE & signature cards	KIUS5 1 of 43	PL000192 to PL000234
3	Investor checks and money orders to EIN '05 to '06, and Deposit slips, NONCONSECUTIVE	EIN-CK13 1 of 43	PL004385 to PL004484
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK14 1 of 100	PL002085 to PL002184
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK15 1 of 100	PL002885 to PL002984
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK16 1 of 100	PL003585 to PL003684
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK17 1 of 100	PL002685 to PL002784
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK18 1 of 100	PL002585 to PL002684
4, 3	Investor checks and money orders to EIN '05, and Deposit slips, NONCONSECUTIVE	EIN-CK19 1 of 100	PL003885 to PL003984
4, 3	Investor checks and money orders to EIN '03 to '05, and Deposit slips, NONCONSECUTIVE	EIN-CK20 1 of 100	PL003185 to PL003284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK21 1 of 100	PL002285 to PL002384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK22 1 of 100	PL001185 to PL001284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK23 1 of 100	PL001285 to PL001384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK24 1 of 100	PL001385 to PL001484
4, 3	Investor checks and money orders to EIN '03 to '04, and Deposit slips, NONCONSECUTIVE	EIN-CK25 1 of 100	PL001485 to PL001584
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK26 1 of 100	PL001585 to PL001684
7, 26	EIN Payouts '04 to '05, NONCONSECUTIVE	EIN-CK27 1 of 100	PL001685 to PL001784
7, 26	EIN Payouts '05 to '06, NONCONSECUTIVE	EIN-CK28 1 of 100	PL001785 to PL001884

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
4, 3	Investor checks and money orders to EIN '06, and Deposit slips, NONCONSECUTIVE & EIN Payouts '06, NONCONSECUTIVE	EIN.KIC 1 of 1010	PL005574 to PL006580
7, 26	EXPLORATIONSTABLE OF RECEIPTS 2003	EIN 2003 cks and receipts	EX03 1 of 137 2 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2004	EIN 2004 cks and receipts	EX-04 1 of 86 3 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2005	EIN 2005 cks and receipts	EX05 - 1 of 90 4 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2006	EIN 2006 cks and receipts	EX06 - 1 of 94 5 ^v
3, 7, 26	Hahns Surplus Checks	Hahn's Surplus cks and receipts	H5 - 1 of 108 1 ^v
4	KI_USbank statements '07	Bank Statements '07	USKI - 1 of 12 6 ^v
	KOKOWEEF INC. presentation	Explanation of cks and receipts given	KIP - 1 of 25 7 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS 2006	KI 2006 cks and receipts	KO - 06 1 of 27 8 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS 2007	KI 2007 cks and receipts	KO - 07 1 of 37 9 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS Brad Johnson	Brad Johnson cks and receipts	BJ 1 of 6 10 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS Laurie Wright	Laurie Wright cks and receipts	T&L 1 of 19 11 ^v
7, 26, 13	Mayan gold & etc.	Drilling Rig bill of sale & Myan Gold Info	MGECT 1 of 11 12 ^v
7, 26	Payouts	Payouts and receipts	PO 1 of 32 13 ^v
3	04 EIN -- Check Info	EIN_04_bank_check_in fo	EINCI 1 of 70
2	04 EIN --Bank Statements	EIN_04_bank_stateme nts	EIN04B5 1 of 45
2	04 EIN --Bank Statements2	EIN_04_bank_stateme nts2	EIN04B52 1 of 79
2	04 EIN --Bank Statements3	EIN_04_bank_stateme nts3	EIN04B53 1 of 68
5	04 EIN --Credit Card Info	EIN_04_credit_card	EINCC04 1 of 50
5	04 EIN --General Ledger	EIN_general_ledger_04	ENGL 1 of 13
5	04 EIN --Balance Sheet	EIN_ledger_balance" sh eet_04	EINLBS 1 of 2
7, 26	04 EIN --Receipts	EIN_receipts_04	EINRD4 1 of 71
5	04 EIN --Revenue	EIN_revenue_04	EINPL04 1 of 43
5	KI-09 -- Accounts Payable	KI_09_accounts_payab le	KIAP09 1 of 15
2	KI-09 -- Bank Statements	KI_09_bank_state	KIB509 1 of 141
3	KI-09 -- Check Detail	KI_09_ck_detail	KICD09 1 of 43
5	KI-09 --Financials	KI_09_financials	KIF09 1 of 2
5	KI-09 --General Ledger	KI_09_general_ledger	KIGL09 1 of 11
5	KI-09 --Proof Ledger Receipts	KI_09_proof_ledger_re celpt	KIPRO9 1 of 5
7, 26	EIN -- 04 Receipts	EIN.KI_04_receipts	EIN.KI04R 1 of 227
7, 26	EIN -- 07 Receipts	EIN.KI_07_receipts	EIN.KI07R 1 of 44
7, 26	EIN -- 08 Receipts	EIN.KI_08_receipts	EIN.KI08R 1 of 333

7 dupes

7 dupes

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
1	EIN and KI 07 Tax Returns	EIN_07_tax_returns	EIN.KI07 1 of 11
2,3	EIN -- Bank Statements & check detail	EIN_07- 9_bank_sta_ck_detail	EIN07-9BSCD 1 of 134
3	EIN-07 -- Checks	EIN_07-9_checks	EIN07-9C 1 of 4
4	EIN-07 -- Deposits	EIN_07-9_deposits	EIN07-9D 1 of 4
5	EIN-07 -- Financials	EIN_07-9_financials	EIN07-9F 1 of 6
5	EIN-07 -- General Ledger	EIN_07- 9_general_ledger	EIN07-9GL 1 of 22
5	KI-07 -- Accounts Payable	KI_07- 9_accounts_payable	KI07-9AP 1 of 13
2	KI-07 -- Bank Records	KI_07- 9_bank_records1	KI07-9BR 1 of 337
3	KI-07 -- Check Detail	KI_07- 9_ck_detail_proof_reg	KI07-9CDPR 1 of 8
5	KI-07 -- Check Reconciliation Detail	KI_07- 9_ck_detail_reconcliat ion	KI07-9CDR 1 of 114
5	KI-07 -- Financials	KI_07-9_financials	KI07-9F 1 of 6
5	KI-07 -- General Ledger	KI_07- 9_general_ledger	KI07-9GL 1 of 22
7, 26	KI-07 -- Receipts	KI_07_receipts	KI07R 1 of 57
3	KI -- Checks cashed by Hahn's Surplus	KI_ck_cshd_hahns:	KICKHS <<1>> of 125
5	KI_09_accounts_payable	Accounts Payable	KIAP09 1 of 15 14 ✓
2	KI_09_bank_state	Bank Statements	KIBS09 1 of 141 15 ✓
3	KI_09_ck_detail	Check Detail	KICD09 1 of 43 16 ✓
5	KI_09_financials	Financials	KIF09 1 of 2 17 ✓
5	KI_09_general_ledger	General Ledger	KIGL09 1 of 11 18 ✓
5	KI_09_proof_ledger_receipt	Proof Ledger Receipts	KIPR09 1 of 5 19 ✓
7, 26	EIN.KI_04_receipts	04 Receipts	EIN.KI04R 1 of 227 20 ✓
7, 26	EIN.KI_07_receipts	07 Receipts	EIN.KI07R 1 of 44 21 ✓
7, 26	EIN.KI_08_receipts	08 Receipts	EIN.KI08R 1 of 333 22 ✓
1	EIN_07_tax_returns	EIN and KI 07 Tax Returns	EIN.KI07 1 of 11 23 ✓
2	EIN_07-9_bank_sta_ck_detail		EIN07-9BSCD 1 of 134
3	EIN_07-9_checks		EIN07-9C 1 of 4
4	EIN_07-9_deposits		EIN07-9D 1 of 4
5	EIN_07-9_financials		EIN07-9F 1 of 6
5	EIN_07-9_general_ledger		EIN07-9GL 1 of 22
5	KI_07-9_accounts_payable		KI07-9AP 1 of 13
2	KI_07-9_bank_records1		KI07-9BR 1 of 337
3	KI_07-9_ck_detail_proof_reg		KI07-9CDPR 1 of 8
3	KI_07-9_ck_detail_reconciliation		KI07-9CDR 1 of 114
5	KI_07-9_financials		KI07-9F 1 of 6
5	KI_07-9_general_ledger		KI07-9GL 1 of 22
7, 26	KI_07_receipts		KI07R 1 of 57
3, 5, 2, 16	KI Quickbooks disc copy (Hand Delivered during Laurie Wright's Deposition)	NOT BATE STAMPED Quickbooks file	
3	KI_ck_cshd_hahns	Checks cashed by Hahn's Surplus	KICKHS <<1>> of 125

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
7, 26	KI-07 -- receipts added -- 07 receipts for dick skoy	KI.DICKSKOY.RECEIPTS. 07	1 of 2 <i>24</i> ✓
7, 26, 8	KI-07 -- SIMSHOUSE NOTES 04-08	KI.LOAN.BS.04-08	1 OF 6 <i>25</i> ✓
7, 26	KI-07 -- SOLAR & RIG RECEIPTS 07	KI.Bofs.SOLAR.07	1 OF 2 <i>26</i> ✓
7, 26	KI-07 -- WALT RECEIPTS PAID IN 00	KI.WALT.RECEIPTS 07	1 OF 30 <i>27</i> ✓
14, 24	KI ISSUED CERTIFICATES	NOT BATE STAMPED (WORD DOCUMENTS)	<i>partial</i> <i>28</i> ✓
14, 24	KI TRANSFER RECORDS	NOT BATE STAMPED (WORD DOCUMENTS)	
14	KI STOCKHOLDERS	NOT BATE STAMPED PDF FILE	<i>29</i> ✓

Exhibit 11

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May 7, 2010

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Jennifer L. Taylor, Esq.
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Las Vegas, Nevada 89145

FILE #	<u>5081.01</u>
INDEX: YES	<u>NO</u>
CALENDAR:	
DATE 1:	
DATE 2:	
BY:	
OTHER:	<u>JK</u>
ATTORNEY:	<u>JK</u>
ROUTE TO:	

Branch Office
543 Plumas Street
Reno, Nevada 89509
Telephone: 775.348.0099
Fax: 775.348.1738

Re: Burke, et al. v. Hahn, et al.

Dear Jennifer:

This is my best attempt to respond to your monstrosity of a second letter to me dated April 29, 2010 ("your 11-page letter"). Your 11-page letter is in sharp contrast to the first letter you wrote to me on April 29, 2010 in response to my letter to you of April 28, 2010. In your first April 29th letter, you indicated that, in response to my inquiry, neither you nor your clients had any copies of corporate minutes of Kokoweef, Inc. ("Kokoweef") for the period of August 2007 to date, so I supplied copies thereof to you also on April 29th in order that the continued deposition of "the corporate designee on the custody and keeping of the records of Kokoweef" could proceed as scheduled on August 30th. Nevertheless, and in direct violation of the Court's Order Regarding Plaintiff's Motion to Compel entered and filed on April 22, 2010 ("the Subject Order"), which all counsel had expressly approved, you unilaterally and at the last minute cancelled the deposition. Thus, it is you, rather than my client or me, who is not in compliance with the Subject Order.

Contrary to your erroneous allegations, I have acted in good faith in attempting to get all documents to you that are covered by the subject Order and previous to that in producing the documents that were covered by the request for production of documents contained within your previous Notice of Deposition served on August 14, 2009.

What you have forgotten or choose to ignore is that voluminous documents were produced during the so-called "audit" period (although there was never any audit) to your predecessor counsel, Neil Beller, before the filing of the so-called derivative complaint in this case, and then additional documents were, as I recall, also produced. Do you have copies of those documents? Do you even know what they consist of? If you do, did you ever bate-stamp them? If not, why not? We should not have to produce these same documents a second time.

Since it is obvious to me that you have not acted in good faith during the discovery process, I agree with Nelson Segel that the purpose of your continuing conduct of harassment, which has and still consists of a "fishing expedition" not permitted under applicable law, is to overwhelm Kokoweef and its counsel as well as Mr. Hahn and his affiliate defendant and their counsel and ultimately to destroy Kokoweef.

With respect to the second full paragraph of your 11-page letter, your belief stated therein is incorrect. I know that corporate minutes are covered by the overly broad description contained in Request No. 14. The fact is that we have previously produced corporate minutes, so I properly inquired of you what corporate minutes you requested and you responded by advising me of the corporate minutes that you stated you and your clients that they didn't have and demanded that they be produced, and I complied.

It remains to be seen whether documents identified in the Directory (as defined by you) have not been produced. There are, of course, documents that were previously produced before you requested that subsequent documents be bated-stamped which were not bate-stamped. Again, why didn't you bate-stamp them yourself? No documents were ever "dumped" on Plaintiffs as you wrongfully allege, and they were identified at the time they were produced. Either they were produced to your previous counsel, who never objected to the form of productions made to him, or, if they were produced after you and your firm came into the case and not bated-stamped, either you weren't paying attention or you never requested then that they be bate-stamped.

With respect to your diatribe in the middle of page 3 of your 11-page letter, the responses are correct because (1) there are no "joint venture agreements operating agreements, partnership agreements, limited liability company agreements" and (2) the only document that we believe could fall into this category would be the idiot agreement that was given little or no consideration with the phoney company, Mayan Gold, that Ted Burke introduced and proposed.

Responding to the first two paragraphs on page 4 of your 11-page letter, the reason that the documents you reference are "Scant" in number is that that is all that there are! The rest of your comments don't make sense. Suffice it to say that, except for documents produced when you were not counsel, all of the documents that have been produced on computer discs are set forth in the Directory to the best of our knowledge, information and belief.

Your comments on the bottom of page 4 and the top of page 5 of your 11-page letter are also misleading, because the expense payments made are recorded in the disc containing Kokoweef's Quick Books program. I am

Jennifer L. Taylor, Esq.
Robertson & Vick, LLP
May 7, 2010 - Page Three

informed that the list of mining claims, which is a matter of public record, was produced on a one-page hard document that was provided to you but was not on a disc and not date-stamped. If you can't find it, we will give you another copy. The only "reorganization documents," which consist of the Agreement and Plan of Reorganization dated November 20, 2005 and the Closing Agreement, Assignment and Receipt dated August 31, 2006, have been in your clients' possession for years; otherwise, you wouldn't even know about the transactions covered by them. In case you haven't reviewed the corporate minutes we produced last week, copies of both are included therein.

With respect to the second paragraph on page 5 of your 11-page letter, the referenced documents are contained in the "19,000 documents" (according to you) that you scanned and placed on discs. You will have to make your own lists of those documents. Incidentally, you still haven't provided us with copies of those discs as you promised. We will anticipate receiving the disks on or before Friday, May 14, 2010. If there is some reason that they cannot be produced, please let me know as soon as possible.

As to the last full paragraph on page 5 of your 11-page letter, see "QUICK BOOKS." As to documents of Mr. Hahn and his affiliated company, you will have to speak to Nelson Segel.

Referring to page 6 of your 11-page letter, I have been unable to speak to Laurie Wright as she is, and was prior to the delivery of your letter, out of town for her employer, but we believe that all of the documents listed as I a) 1-16) are in the discs supplied with the response to request for production of documents served April 14, 2010. Ms. Wright is returning to Las Vegas on or about Monday, May 10, 2010; however, as stated below I will be out of town that entire week; ; therefore, I will not be able to speak to her about this issue until I return.

As to I b) 1), the documents contained therein, consisting of documents reflecting visitors to the mine and letters from old stockholders all from 1988. Documents in I b) 2-3) consist of duplicate work sheets that were scanned by you in the stockholders' files. We did not produce item no I b) 4), because it is merely a corporate form book from 1986 and contains no corporate documents of Kokoweef. As to "I b) 5-6)," these records are included in the Directory as documents date-stamped as "EIN" and clearly described as for '03 and '04. No. I b) 7) was not produced because it is a virtually empty binder containing three pages that mean nothing. No. I b) 8) are documents produced at the evidentiary hearing and are clearly identified as stated in the Directory. No. I b) 9) was not produced because they are court documents filed in this case. No. I b) 10) contains documents that are identified in the Directory. Nos. I

b) 11) and 12) were not produced because they are books containing corporate minutes for 1884-1990 and 1990-1997, respectively. Nos. I) b) 13-21) were not produced because they were not requested, provided, however, that I agree that proxies (although not specifically named in the Request) may be interpreted as corporate records that should have been produced, but, accordingly, if you want copies of these proxies we will produce them, , since there are thousands of them, you will have to make the same type of arrangements as you recently did to scan the voluminous shareholder files.

No. I c) 1-3), consisting of (1) of photographs of rock, (2) assays, and (3) a safety book for BLM No. I c) 4) contains an assay, which was not produced because it was not requested and a document relating to Mayan Gold, which is referred to above. No. I) c) 5) contains documents relating to a wind/solar system, which was not produced because it was not requested. No. I c) 6) contains documents relating to underground procedure, which was not produced because it was not requested. No. I c) 7) contains photographs of a drill rig, which was not produced because they were not requested. No. I c) 8) contains blank, unused stock certificates of Explorations Incorporated of Nevada ("EIN"), which was not produced because they were not requested. No. I c) 9) are in the Director so described. Nos. I c) 10-13) speak for themselves as copies of court documents in this lawsuit. No. I c) 16) contains unfiled and duplicate court documents in this case. No. I c) 17) contains a photograph of the mail-out of the stockholders' meeting for '09 an operating manual, solar information, report on Drill Hole 13, and an explosive permit, which were not produced because they were not requested.

No. I d) 1) contains maps, the 1993 newsletter, a geological report by Hewitt, and a parts catalogue, which were not produced because they were not requested. No. I d) 2) contains drill rig information, which was not produced because it was not requested. No. I d) 3) contains duplicate copies from the bank that were subpoenaed in this case in 2009 which were not produced because you already have them! No. I d) 4) consist of the green and burgundy books containing the Quick Books records that are identified in the Directory, while the box contains copies of documents which Ted Burke put on the unauthorized "Kokoweef.com" web site, which were not produced because they were not requested. No. I d) 5 is an empty black binder. No. I d) 6) contains miscellaneous court documents in this case. No. I d) 7) contains a copy of an assay report, which Ted Burke possesses, and extra copies of documents that have been previously produced.

I e) "Column 1:" No. 1) contains maps, which were not produced because they were not requested. No. 2) contains receipts for 2003-2006, which

are set forth in the Directory. No. 3) contains tools, which were not produced because they were not requested.

I e) "Column 2:" The documents in no. 1 are identified in the Directory. No. 2 contains extra copies of old newsletters, which were not produced because they were not requested. No. 3 contains obsolete miscellaneous papers relating to mining claims covering the period 1991-2000, which were not produced because they were not requested. Nos. 4-6) are identified in the Directory.

I e) "Two Boxes next to shelf:" No. 1) is empty. No. 2) contain receipts that were produced and are listed in the Directory.

I e) The "Box - at back of closet with Binders & Books" contains old Mining manuals, books and catalogues, which were not produced because they were not requested.

I f) "Shelves at back of closet:" No. 2 contains paid receipts covering 2003-2006 which are included in the Directory.

No. II a) contains reference materials, tools, empty file folders, and old unfiled, unorganized documents, which were not produced because they were not requested. No. II b) contains shareholder records that were scanned by you. With respect to II c), the bottom drawer is empty, because its contents set forth on the label on the drawer were moved up to the top drawer, and those shareholders records were scanned by you, except for blank Kokoweef office forms remaining in the bottom drawer, which were not produced because they were not requested.

III a), as stated, contains "Stock Certificates and Ledgers," which were scanned by you except for returned EIN stock certificates that were exchanged for Kokoweef stock certificates, but the information contained there is set forth in the stockholder files, which were scanned by you.

I have no objection to your receiving a copy of the spread sheets, provided, however, that you understand that they are not as current and up-to-date as the information that you received in the shareholder files.

With respect to the "unreadable receipts" referred to in the second full paragraph on page 9 of your 11-page letter, during the so-called "audit" period, Mr. Beller made arrangements with Kokoweef for removal of various corporate petty cash receipts and had them scanned. There were certain of those receipts that were not readable because of the passage of time, and, therefore, they were separated from the readable receipts. Those unreadable receipts were apparently not returned and cannot now be located. We will continue our efforts, however, to find them and will advise if we do.

Jennifer L. Taylor, Esq.
Robertson & Vick, LLP
May 7, 2010 - Page Six

Once again Laurie Wright is not available right now; consequently, I am not able at this time to comment on the content of the third and fourth full paragraphs of your 11-page letter. Nevertheless, I can assure that, with respect to the remainder of the preceding set forth at the top of page 10 of your 11-page letter, there are no Kokoweef documents in any safe, where none have been since on or about September 3, 2008.

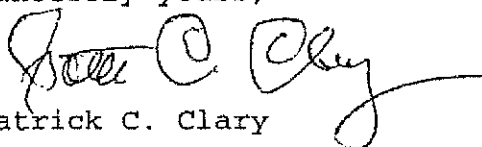
With respect to the first full paragraph on page 10 of your 11-page letter, I am informed that the two shareholder lists were offered to you when you were in Kokoweef's office and that your reply was that you would ask Nelson Segel for the lists. Did you ask Nelson? If not, are you now asking me for them? If so, you can have them. I don't appreciate your misleading commentary that would suggest that we were deliberately withholding them from you.

With respect to the last half of page 10 of your 11-page letter, my comments above regarding Laurie Wrights being unavailable also apply.

I cannot figure out what you mean or what you want me to do in the generalized comments contained in the first and second full paragraphs on page 11 of your 11-page letter. As to the third full paragraph on page 10, your continuing threats and your arbitrary and unauthorized deadline of May 10, 2010, when in fact it is you, not the undersigned, who is violation of the aforesaid Order of the court, are also not appreciated.

as I alluded to above, on Monday, May 10, 2010, I will be flying early in the morning to Washington, D. C. to attend the CARE National Conference and Celebration and won't return to Las Vegas until the following Monday, May 17, 2010. Please govern yourself accordingly.

Sincerely yours,



Patrick C. Clary

PCC:lf

cc: M Nelson Segel, Esq.
Larry Hahn, President
Kokoweef, Inc.

Exhibit 12

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '07 NONCONSECUTIVE) CREDIT CARD #4991	EIN-BC 1 of 100	PL000001 to PL 000100
2	Citibank Corporate Credit Card (company credit card statement, RANGING FROM '02 TO '04 NONCONSECUTIVE) CREDIT CARD #4991 & #9325	EIN-BC 1 of 91	PL000101 to PL 000191
2	US Bank Corporate Credit Card (Kokoweef Card, '04-'08, NONCONSECUTIVE) CREDIT CARD #3683	EIN-BUS 1 of 43	PL000192 to PL000232
2	American Express Corporate Credit Card #62007 & #71005, NONCONSECUTIVE	EIN-BAMEX 1 of 100	PL000235 to PL000333
2	American Express Corporate Credit Card #62007, NONCONSECUTIVE, '03 TO '04	EIN-BAMEX2 1 of 100	PL000335 to PL000433
2	American Express Corporate Credit Card #62007 & #63005, NONCONSECUTIVE, '04 to '05	EIN-BAMEX3 1 OF 100	PL000435 to PL000533
2	American Express Corporate Credit Card #63005, NONCONSECUTIVE, '05 to '07	EIN-BAMEX4 1 OF 89	PL000535 to PL000623
2	US Bank Bank Statement (Explorations, '02-'09, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS 1 of 100	PL000624 to PL000723
2	US Bank Bank Statement (Explorations, '06-'08, NONCONSECUTIVE) CREDIT CARD #4121	EIN-BUS3 1 of 100	PL000724 to PL000823
2	US Bank Bank Statement (Kokoweef & Explorations, '06-'09, NONCONSECUTIVE) CREDIT CARD EIN/#4121 & KI/#3683	EIN-BUS4 1 of 100	PL000824 to PL000923
3	Investor checks and money orders to EIN and KI, '02 to '03	EIN-CK 1	PL002485 TO PL002584
3	Investor checks and money orders to EIN and KI, '04	EIN-CK2 1 of 100	PL003685 TO PL003784
2, 3	Investor checks and money orders to EIN and KI, '03 to '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK3 1 of 100	PL003085 TO PL003184
2, 3	Investor checks and money orders to EIN and KI, '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK4 1 of 100	PL003285 TO PL003384
3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK5 1 of 100	PL004085 TO PL004184
2, 3	Investor checks and money orders to EIN, '04 & '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK6 1 of 100	PL003785 TO PL003884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK7 1 of 100	PL004184 TO PL004284
2, 3	Investor checks and money orders to EIN, '02, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK9 1 of 100	PL002484 TO PL002385
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK8 1 of 100	PL003985 TO PL004084
2, 3	Investor checks and money orders to EIN, '03 & '04, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK10 1 of 100	PL002985 TO PL003084
3	Investor checks and money orders to EIN, '03, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK11 1 of 100	PL002785 TO PL002884
2, 3	Investor checks and money orders to EIN, '05, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK12 1 of 100	PL004285 TO PL004384
2, 3	Investor checks and money orders to EIN, '05 & '06, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	EIN-CK13 1 of 100	PL004485 TO PL004584
	Hahn's Surplus Payroll Account "03	HS-US 1 of 100	PL001085 TO PL001184
2, 3, 7, 26	Kokoweef Payouts '06 to '09 & Investor checks and money orders to KI, '07, NONCONSECUTIVE & EIN USBank DEPOSIT SLIPS	KI-CK2 1-100	PL005285 TO PL005384
	Kokoweef Payouts '06 to '09, NONCONSECUTIVE	KI-CK3 1-100	PL004585 TO PL004684
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK7 1-100	PL005085 TO PL005184
3	Kokoweef Deposit Slips & Investor checks and money orders to KI '07 to '08, NONCONSECUTIVE	KI-USD1 1-100	PL005385 TO PL005484

KOKOWEEF DIRECTORY OF DOCUMENTS PRODUCED

MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
7, 26	Kokoweef Payouts '08, NONCONSECUTIVE	KI-CK8 1-100	PL005185 TO PL005284
7, 26	Kokoweef Payouts '07, NONCONSECUTIVE	KI-CK6 1-100	PL004985 TO PL005084
7, 26	Kokoweef Payouts IG '07, NONCONSECUTIVE	KI-CK5 1-100	PL004785 TO PL004884
7, 26	Kokoweef Payouts EIN'06, NONCONSECUTIVE	EIN_CK29 1 of 100	PL001885 TO PL001984
3, 7, 26	Kokoweef Payouts EIN'06, Investor checks and money orders to EIN '02 to '09, NONCONSECUTIVE	EIN_CK30 1 of 100	PL001985 TO PL002084
3	Investor checks and money orders to EIN & KI '04 to '06, and Deposit slips, NONCONSECUTIVE	KICK1 1 of 87	PL005485 TO PL005571
3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EINUS1 1 of 100	PL002185 TO PL002284
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS2 1 of 100	PL003385 TO PL003484
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EINUS3 1 of 100	PL003485 TO PL003584
2	US Bank Statements for Kokoweef '05 to '06, NONCONSECUTIVE	KI-US53 1 of 61	PL001026 TO PL001084
2	US Bank Statements for Kokoweef '06 TO '08, NONCONSECUTIVE	KI-US52 1 of 61	PL000924 TO PL001023
3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-US4 1 of 100	PL003485 TO PL003584
	Kokoweef Payouts '07	KI-CK4 1 of 100	PL004685 TO PL004784
2	US Bank Statements for Kokoweef & Exploration'04 TO '09, NONCONSECUTIVE & signature cards	KIUS5 1 of 43	PL000192 to PL000234
3	Investor checks and money orders to EIN '05 to '06, and Deposit slips, NONCONSECUTIVE	EIN-CK13 1 of 43	PL004385 to PL004484
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK14 1 of 100	PL002085 to PL002184
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK15 1 of 100	PL002885 to PL002984
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK16 1 of 100	PL003585 to PL003684
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK17 1 of 100	PL002685 to PL002784
4, 3	Investor checks and money orders to EIN '03, and Deposit slips, NONCONSECUTIVE	EIN-CK18 1 of 100	PL002585 to PL002684
4, 3	Investor checks and money orders to EIN '05, and Deposit slips, NONCONSECUTIVE	EIN-CK19 1 of 100	PL003885 to PL003984
4, 3	Investor checks and money orders to EIN '03 to '05, and Deposit slips, NONCONSECUTIVE	EIN-CK20 1 of 100	PL003185 to PL003284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK21 1 of 100	PL002285 to PL002384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK22 1 of 100	PL001185 to PL001284
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK23 1 of 100	PL001285 to PL001384
4, 3	Investor checks and money orders to EIN '02, and Deposit slips, NONCONSECUTIVE	EIN-CK24 1 of 100	PL001385 to PL001484
4, 3	Investor checks and money orders to EIN '03 to '04, and Deposit slips, NONCONSECUTIVE	EIN-CK25 1 of 100	PL001485 to PL001584
4, 3	Investor checks and money orders to EIN '04, and Deposit slips, NONCONSECUTIVE	EIN-CK26 1 of 100	PL001585 to PL001684
7, 26	EIN Payouts '04 to '05, NONCONSECUTIVE	EIN-CK27 1 of 100	PL001685 to PL001784
7, 26	EIN Payouts '05 to '06, NONCONSECUTIVE	EIN-CK28 1 of 100	PL001785 to PL001884

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MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
4, 3	Investor checks and money orders to EIN '06, and Deposit slips, NONCONSECUTIVE & EIN Payouts '06, NONCONSECUTIVE	EIN.KIC 1 of 1010	PL005574 to PL006580
7, 26	EXPLORATIONSTABLE OF RECEIPTS 2003	EIN 2003 cks and receipts	EX03 1 of 137 2 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2004	EIN 2004 cks and receipts	EX-04 1 of 86 3 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2005	EIN 2005 cks and receipts	EX05 - 1 of 90 4 ^v
7, 26	EXPLORATIONS TABLE OF RECEIPTS 2006	EIN 2006 cks and receipts	EX06 - 1 of 94 5 ^v
3, 7, 26	Hahns Surplus Checks	Hahn's Surplus cks and receipts	H5 - 1 of 108 1 ^v
4	KI_USbank statements '07	Bank Statements '07	USKI - 1 of 12 6 ^v
	KOKOWEEF INC. presentation	Explanation of cks and receipts given	KIP - 1 of 25 7 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS 2006	KI 2006 cks and receipts	KO - 06 1 of 27 8 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS 2007	KI 2007 cks and receipts	KO - 07 1 of 37 9 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS Brad Johnson	Brad Johnson cks and receipts	BJ 1 of 6 10 ^v
7, 26	KOKOWEEF TABLE OF RECEIPTS Laurie Wright	Laurie Wright cks and receipts	T&L 1 of 19 11 ^v
7, 26, 13	Mayan gold & etc.	Drilling Rig bill of sale & Myan Gold Info	MGECT 1 of 11 12 ^v
7, 26	Payouts	Payouts and receipts	PO 1 of 32 13 ^v
3	04 EIN - Check Info	EIN_04_bank_check_in fo	EINCI 1 of 70
2	04 EIN --Bank Statements	EIN_04_bank_stateme nts	EIN04BS 1 of 45
2	04 EIN --Bank Statements2	EIN_04_bank_stateme nts2	EIN04BS2 1 of 79
2	04 EIN --Bank Statements3	EIN_04_bank_stateme nts3	EIN04BS3 1 of 68
5	04 EIN --Credit Card Info	EIN_04_credit_card	EINCC04 1 of 50
5	04 EIN --General Ledger	EIN_general_ledger_04	ENGL 1 of 13
5	04 EIN --Balance Sheet	EIN_ledger_balance_sh eet_04	EINLBS 1 of 2
7, 26	04 EIN --Receipts	EIN_receipts_04	EINRO4 1 of 71
5	04 EIN --Revenue	EIN_revenue_04	EINPLO4 1 of 43
5	KI-09 -- Accounts Payable	KI_09_accounts_payab le	KIAP09 1 of 15
2	KI-09 -- Bank Statements	KI_09_bank_state	KIBS09 1 of 141
3	KI-09 -- Check Detail	KI_09_ck_detail	KICD09 1 of 43
5	KI-09 --Financials	KI_09_financials	KIF09 1 of 2
5	KI-09 --General Ledger	KI_09_general_ledger	KIGL09 1 of 11
5	KI-09 --Proof Ledger Receipts	KI_09_proof_ledger_re celpt	KIPRO9 1 of 5
7, 26	EIN -- 04 Receipts	EIN.KI_04_receipts	EIN.KI04R 1 of 227
7, 26	EIN -- 07 Receipts	EIN.KI_07_receipts	EIN.KI07R 1 of 44
7, 26	EIN -- 08 Receipts	EIN.KI_08_receipts	EIN.KI08R 1 of 333

→ dupes

→ dupes

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MATCHES REQUEST #	Description	BATE STAMPS	BATE STAMPS PAGE #
1	EIN and KI 07 Tax Returns	EIN_07_tax_returns	EIN.KI07 1 of 11
2,3	EIN - Bank Statements & check detail	EIN_07- 9_bank_sta_ck_detail	EIN07-9BSCD 1 of 134
3	EIN-07 -- Checks	EIN_07-9_checks	EIN07-9C 1 of 4
4	EIN-07 -- Deposits	EIN_07-9_deposits	EIN07-9D 1 of 4
5	EIN-07 -- Financials	EIN_07-9_financials	EIN07-9F 1 of 6
5	EIN-07 -- General Ledger	EIN_07- 9_general_ledger	EIN07-9GL 1 of 22
5	KI-07 -- Accounts Payable	KI_07- 9_accounts_payable	KI07-9AP 1 of 13
2	KI-07 -- Bank Records	KI_07- 9_bank_records1	KI07-9BR 1 of 337
3	KI-07 -- Check Detail	KI_07- 9_ck_detail_proof_reg	KI07-9CDPR 1 of 8
5	KI-07 -- Check Reconciliation Detail	KI_07- 9_ck_detail_reconcliat ion	KI07-9CDR 1 of 114
5	KI-07 -- Financials	KI_07-9_financials	KI07-9F 1 of 6
5	KI-07 -- General Ledger	KI_07- 9_general_ledger	KI07-9GL 1 of 22
7, 26	KI-07 -- Receipts	KI_07_receipts	KI07R 1 of 57
3	KI -- Checks cashed by Hahn's Surplus	KI_ck_cshd_hahns	KICKHS <<1>> of 125
5	KI 09 accounts payable	Accounts Payable	KIAP09 1 of 15 14 ✓
2	KI 09 bank state	Bank Statements	KIBS09 1 of 141 15 ✓
3	KI 09 ck detail	Check Detail	KICD09 1 of 43 16 ✓
5	KI 09 financials	Financials	KIF09 1 of 2 17 ✓
5	KI 09 general ledger	General Ledger	KIGL09 1 of 11 18 ✓
5	KI 09 proof ledger receipt	Proof Ledger Receipts	KIPR09 1 of 5 19 ✓
7, 26	EIN.KI 04 receipts	04 Receipts	EIN.KI04R 1 of 227 20 ✓
7, 26	EIN.KI 07 receipts	07 Receipts	EIN.KI07R 1 of 44 21 ✓
7, 26	EIN.KI 08 receipts	08 Receipts	EIN.KI08R 1 of 333 22 ✓
1	EIN_07_tax_returns	EIN and KI 07 Tax Returns	EIN.KI07 1 of 11 23 ✓
2	EIN 07-9 bank sta ck detail		EIN07-9BSCD 1 of 134
3	EIN 07-9 checks		EIN07-9C 1 of 4
4	EIN 07-9 deposits		EIN07-9D 1 of 4
5	EIN 07-9 financials		EIN07-9F 1 of 6
5	EIN 07-9 general ledger		EIN07-9GL 1 of 22
5	KI 07-9 accounts payable		KI07-9AP 1 of 13
2	KI 07-9 bank records1		KI07-9BR 1 of 337
3	KI 07-9 ck detail proof reg		KI07-9CDPR 1 of 8
3	KI 07-9 ck detail reconciliation		KI07-9CDR 1 of 114
5	KI 07-9 financials		KI07-9F 1 of 6
5	KI 07-9 general ledger		KI07-9GL 1 of 22
7, 26	KI 07 receipts		KI07R 1 of 57
3, 5, 2, 16	KI Quickbooks disc copy (Hand Delivered during Laurie Wright's Deposition)	NOT BATE STAMPED Quickbooks file	
3	KI_ck_cshd_hahns	Checks cashed by Hahn's Surplus	KICKHS <<1>> of 125

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7, 26	KI-07 -- receipts added -- 07 receipts for dick skoy	KI.DICKSKOY.RECEIPTS. 07	1 of 2 <i>24</i> <i>MD</i> ✓
7, 26, 8	KI-07 -- SIMSHOUSE NOTES 04-08	KI.LOAN.BS.04-08	1 OF 6 <i>25</i> <i>AA</i> ✓
7, 26	KI-07 -- SOLAR & RIG RECEIPTS 07	KI.Bofs.SOLAR.07	1 OF 2 <i>26</i> <i>RG</i> ✓
7, 26	KI-07 -- WALT RECEIPTS PAID IN 00	KI.WALT.RECEIPTS 07	1 OF 30 <i>27</i> <i>WA</i> ✓
14, 24	KI ISSUED CERTIFICATES	NOT BATE STAMPED (WORD DOCUMENTS)	<i>partial</i> <i>28</i> ✓
14, 24	KI TRANSFER RECORDS	NOT BATE STAMPED (WORD DOCUMENTS)	
14	KI STOCKHOLDERS	NOT BATE STAMPED PDF FILE	<i>29</i> ✓