

CLERK OF THE COURT

**SUPP**  
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  
Facsimile: (702) 247-6227

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: XIII

) **PLAINTIFFS' SUPPLEMENT TO ITS**  
) **MOTION TO EXTEND EXPERT**  
) **DISCLOSURE AND DISCOVERY**  
) **DEADLINES; EX PARTE**  
) **APPLICATION FOR AN ORDER**  
) **SHORTENING TIME THEREON**  
) **(SECOND REQUEST)**

1 Plaintiffs Ted R. Burke; Michael R. And Laurretta L. Kehoe; John Bertoldo; Paul Barnard;  
2 Eddy Kravetz; Jackie and Fred Kravetz; Steven Franks; Paula Maria Barnard; Peter T. And Lisa  
3 A. Freeman; Leon Golden; C.A. Murff; Gerda Fern Billbe; Bob and Robyn Treska; Michael  
4 Randolph and Frederick Willis (hereinafter collectively referred to as "Plaintiffs"), by and  
5 through their undersigned counsel of record, Robertson & Vick LLP, files this Supplement to  
6 their Motion for an Extension of Expert Disclosure and Discovery Deadlines and Ex Parte  
7 Application for an Order Shortening Time (the "Motion").

8  
9  
10 **PROPOSED STIPULATION REGARDING**  
**EXPERT DISCLOSURE DEADLINES**

11 Pursuant to the Business Court Scheduling Order and Trial Setting Order dated June 2,  
12 2010, expert disclosures are due on September 3, 2010. After the Order Shortening Time was  
13 executed by this Court and the hearing on Plaintiffs' Motion set for September 14, 2010, counsel  
14 for Plaintiff contacted counsel for the Defendants requesting that the expert disclosure deadlines  
15 be briefly extended to await a ruling on the Motion and on Plaintiffs' Objection to the Discovery  
16 Commissioner's Report and Recommendation dated August 16, 2010 (the "Objection"). The  
17 proposed Stipulation would have extended the Expert Disclosure Deadline to September 17,  
18 2010, should the Court deny Plaintiffs' Motion and Objection. See Ex. 1, a true and correct copy  
19 of the email, a copy of the "print screen" version of the email showing the attachments to the  
20 email, and a copy of the proposed stipulation. Counsel for Plaintiffs also left a voice mail  
21 message for counsel for Defendants Larry Hahn and Hahn's World of Surplus (hereafter the  
22 "Hahn Defendants").

23 Counsel for the Hahn Defendants and counsel for Plaintiffs discussed this request at  
24 approximately 3:10pm on September 2, 2010. Counsel for the Hahn Defendants refused to agree  
25 to the proposed two-week stipulation. Plaintiffs' counsel reminded counsel for the Hahn  
26 Defendants of the extension recently granted at his request. Additionally, when counsel for the  
27 Hahn Defendants indicated that his client would not permit such a stipulation, Plaintiffs' counsel  
28 informed him that several extensions had been provided to him, over the objections of the

1 Plaintiffs themselves.<sup>1</sup> Still, counsel for the Hahn Defendants refused to agree to the two-week  
2 extension for expert disclosures. See Ex. 2, a true and correct copy of an email sent to counsel  
3 for the Hahn Defendants memorializing this conversation.

4 Counsel for Kokoweef and Patrick C. Clary simply sent an email claiming the Stipulation  
5 was not attached and refusing to sign the proposed stipulation. See Ex. 3. Counsel for  
6 Kokoweef and Patrick C. Clary may have misunderstood how to identify an attachment on an  
7 email. However, as seen in Ex. 1, the "Print Screen" version of the email clearly shows a  
8 WordPerfect document attached.

9 In light of the refusal to execute the Stipulation attached to Ex. 1, Plaintiffs have served  
10 expert disclosures in order to reserve their rights to file full expert reports after the hearing on  
11 Plaintiffs' Objection and the Motion. See Ex. 4. This Supplement is filed in order to update the  
12 Court on the status of communications between the parties in regard to the continued progress in  
13 this litigation and the status of Plaintiffs' Expert Disclosures in light of the pending Motion and  
14 Objection. See Declaration of Jennifer L. Taylor in support of this Supplement.

15 DATED this 3<sup>rd</sup> day of September, 2010.

16 ROBERTSON & VICK, LLP

17 By: 

18 ALEXANDER ROBERTSON, IV

19 Bar No. 8642

JENNIFER L. TAYLOR

20 Bar No. 5798

401 N. Buffalo Drive, Suite 202

21 Las Vegas, Nevada 89145

22 *Attorneys for Plaintiffs*

23  
24 <sup>1</sup> Nevada Rule of Professional Conduct 3.2(b) addresses this situation and states that the  
25 duty to expedite litigation consistent with the interests of the client "does not preclude a lawyer  
26 from granting a reasonable request from opposing counsel for an accommodation, such as an  
27 extension of time, or from disagreeing with a client's wishes, on administrative and tactical  
28 matters. . . ." Plaintiffs raise this rule because Plaintiffs' counsel has, on occasions, abided by  
this rule, and the pledge of professionalism set forth at the Clark County Bar Association's  
website,  
[http://www.clarkcountybar.org/index.php?option=com\\_content&task=blogcategory&id=77&Itemid=181](http://www.clarkcountybar.org/index.php?option=com_content&task=blogcategory&id=77&Itemid=181),  
in granting reasonable extensions to counsel for the Hahn Defendants in disagreement  
with her clients' wishes to decline those requests for extensions.

**DECLARATION OF JENNIFER L. TAYLOR, ESQ.**  
**IN SUPPORT OF PLAINTIFFS' SUPPLEMENT TO ITS MOTION TO EXTEND**  
**EXPERT DISCLOSURE AND DISCOVERY DEADLINES; AND EX PARTE**  
**APPLICATION FOR AN ORDER SHORTENING TIME**

STATE OF NEVADA            )  
  ) ss:  
COUNTY OF CLARK         )

JENNIFER L. TAYLOR, ESQ., being first duly sworn, deposes and states that she is an attorney licensed to practice in all courts in the State of Nevada, that she is counsel for Plaintiffs that she has personal knowledge of the facts stated herein, except for those stated and made upon information and belief, wherein so indicated.

1. I make this Declaration on behalf of Plaintiffs and in support of their Supplement to its Motion to Extend Expert Disclosure and Discovery Deadlines; and ex Parte Application for an Order Shortening Time (the "Supplement").

2. Pursuant to the Business Court Scheduling Order and Trial Setting Order dated June 2, 2010, expert disclosures are due on September 3, 2010. After the Order Shortening Time was executed by this Court and the hearing on Plaintiffs' Motion set for September 14, 2010, I contacted counsel for the Defendants requesting that the expert disclosure deadlines be briefly extended to await a ruling on the Motion and on Plaintiffs' Objection to the Discovery Commissioner's Report and Recommendation dated August 16, 2010 (the "Objection").

3. The proposed Stipulation would have extended the Expert Disclosure Deadline to September 17, 2010, should the Court deny Plaintiffs' Motion and Objection. See Ex. 1, a true and correct copy of the email, a copy of the "print screen" version of the email showing the attachments to the email, and a copy of the proposed stipulation. I also left a voice mail message for M. Nelson Segel, counsel for Defendants Larry Hahn and Hahn's World of Surplus (hereafter the "Hahn Defendants").

4. Mr. Segel and I discussed this request at approximately 3:10 pm on September 2,

1 2010. Mr. Segel refused to agree to the proposed two-week stipulation. I reminded him of the  
2 extension recently granted at his request regarding the deadline for the identification of experts.

3 5. Mr. Segel then indicated that his client would not permit the stipulation to extend  
4 the date for Expert Disclosures, even for two weeks. Plaintiffs' counsel informed him that  
5 several extensions had been provided to him, over the objections of the Plaintiffs themselves.  
6 Still, counsel for the Hahn Defendants refused to agree to the two-week extension for expert  
7 disclosures. See Ex. 2, a true and correct copy of an email sent to counsel for the Hahn  
8 Defendants memorializing this conversation.

9 6. I am aware of Nevada Rule of Professional Conduct 3.2(b), which addresses this  
10 situation and states that the duty to expedite litigation consistent with the interests of the client  
11 "does not preclude a lawyer from granting a reasonable request from opposing counsel for an  
12 accommodation, such as an extension of time, or from disagreeing with a client's wishes, on  
13 administrative and tactical matters. . . ." I raised this rule in our Supplement because Plaintiffs'  
14 counsel has, on occasions, abided by this rule, and the pledge of professionalism set forth at the  
15 Clark County Bar Association's website:

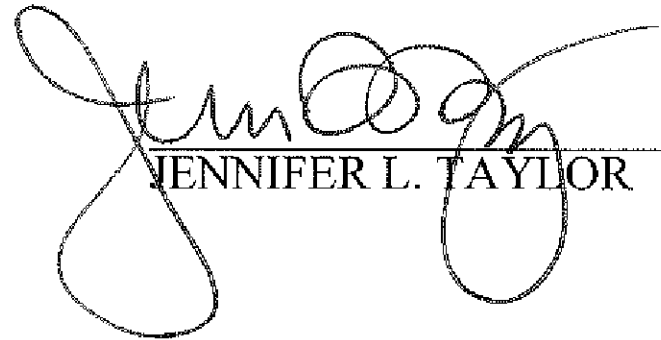
16 [http://www.clarkcountybar.org/index.php?option=com\\_content&task=blogcategory&id=77&Itemid=181](http://www.clarkcountybar.org/index.php?option=com_content&task=blogcategory&id=77&Itemid=181) in  
17 granting reasonable extensions to Mr. Segel in disagreement with my clients' wishes to decline  
18 those requests for extensions.

19 7. Patrick C. Clary, counsel for Kokoweef and Patrick C. Clary simply sent an email  
20 claiming the Stipulation was not attached and refusing to sign the proposed stipulation. See Ex.  
21 3. I was concerned that the stipulation had not been attached, but confirmed that it actually had  
22 been attached. Mr. Clary may have misunderstood how to identify an attachment on an email.  
23 However, as seen in Ex. 1, the "Print Screen" version of the email clearly shows a WordPerfect  
24 document attached.

25 8. In light of Messrs. Segel's and Clary's refusal to execute the Stipulation attached  
26 to Ex. 1, Plaintiffs have served expert disclosures in order to reserve their rights to file full expert  
27 reports after the hearing on Plaintiffs' Objection and the Motion. See Ex. 4. I filed this  
28 Supplement in order to update the Court on the status of communications between the parties in

1 regard to the continued progress in this litigation and the status of Plaintiffs' Expert Disclosures  
2 in light of the pending Motion and Objection.

3 I declare under the penalty of perjury that the foregoing is true and correct.  
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7 JENNIFER L. TAYLOR  
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28 ROBERTSON  
& VICK, LLP

**CERTIFICATE OF MAILING**

I hereby certify that on the 3rd day of September, 2010, service of the foregoing  
**PLAINTIFFS' SUPPLEMENT TO ITS MOTION TO EXTEND EXPERT DISCLOSURE  
AND DISCOVERY DEADLINES; EX PARTE APPLICATION FOR AN ORDER  
SHORTENING TIME THEREON (SECOND REQUEST)** was made this date by depositing  
a copy thereof for mailing at Las Vegas, Nevada, postage prepaid, addressed to:

M. Nelson Segel, Chartered  
M. Nelson Segel, Esq.  
624 South 9<sup>th</sup> Street  
Las Vegas, NV 89101  
Telephone: (702) 385-6266  
Facsimile: (702) 382-2967  
**Attorneys for Larry Hahn and  
Hahn's World of Surplus, Inc.**

Patrick C. Clary, Chartered  
Patrick C. Clary, Esq.  
7201 West Lake Mead Blvd., Suite 410  
Las Vegas, NV 89129  
Telephone: (702) 382-0813  
Facsimile: (702) 382-7277  
**Attorneys for Kokoweef, Inc.**



Melissa Taamai

# **EXHIBIT 1**



## Jennifer L. Taylor

**From:** Jennifer L. Taylor  
**Sent:** Thursday, September 02, 2010 11:55 AM  
**To:** 'nelson@nelsonsegellaw.com'  
**Cc:** 'Patrick C. Clary'  
**Subject:** RE: Extension of Expert Deadlines

Dear Mr. Segel:

I have, at your suggestion, filed a Motion to Extend Expert Deadlines on an OST. The OST was granted yesterday, and we will be hand-delivering it to you and Mr. Clary today. The hearing is on 9/14, which as you requested, should give you ample time to respond. I have also filed my Objection to the Discovery Commissioner's Report and Recommendation of 8/16/2010. I have not received a hearing date yet on the Objection.

In the meantime, the Scheduling Order contemplates disclosure of expert reports tomorrow, September 3, 2010. I would like to propose that we briefly extend the disclosure dates to September 17, 2010, to get past the hearing on the Motion to Extend Expert Deadlines. We could also extend rebuttal reports the same two weeks. If the Judge denies my motion to extend the deadlines, then we will serve expert reports on September 17, 2010. If she grants my motion, then we will roll the dates to whatever she directs. This minor extension and request will not cause any prejudice to you or your clients, or to your co-defendant and his clients, and is akin to the extension you recently requested, and I agreed to, for the identification of experts.

I have attached a proposed Stipulation for your and Mr. Clary's review. Please advise as soon as possible as to whether you are willing to execute a stipulation for this brief extension pending the outcome of our hearings with Judge Gonzales. Thank you in advance for your time and professional courtesy in this matter.

Sincerely,  
Jennifer L. Taylor  
Robertson & Vick, LLP  
401 N. Buffalo Dr., Suite 202  
Las Vegas, NV 89145

Office Phone (702) 247-4661  
Direct E-mail address: [jtaylor@rvcdlaw.com](mailto:jtaylor@rvcdlaw.com)

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-----Original Message-----

**From:** M Nelson Segel [mailto:[nelson@nelsonsegellaw.com](mailto:nelson@nelsonsegellaw.com)]  
**Sent:** Thursday, August 19, 2010 5:53 PM  
**To:** Jennifer L. Taylor  
**Cc:** 'Patrick C. Clary'  
**Subject:** Extension of Expert Deadlines

Ms. Taylor:

I have had an opportunity to consider your request for an extension of time to provide expert reports. As I understand your position, you do not believe that Mr. Stringham can provide a report without reviewing the bank accounts and credit card statements of Mr. & Mrs. Hahn, as well as, all of the

9/3/2010

financial documentation regarding Hahn's World of Surplus, Inc. ("Surplus"). Unfortunately, we do not understand the "need" for this information to enable Mr. Stringham to determine whether wrongful conduct has occurred.

As I understand it, Kokoweef, Inc. has provided your clients, and you, or you have obtained through the subpoenas we did not contest, with copies of all bank statements and checks, including front and back, for Kokoweef. This would enable you to trace all Kokoweef transactions. It should be obvious that much of this disclosure occurred prior to the commencement of the litigation because the original complaint included many checks payable to individuals, endorsed to Surplus and deposited in Surplus' bank account. Clearly, the Plaintiffs would not have been aware of these transactions if Kokoweef had not provided the documentation to them. You have made copies of ALL of the investor files and have the information regarding the moneys raised. It is my understanding that the records of Kokoweef account for all of these transactions.

Under the circumstances, I do not understand how making the intrusive inspection of my clients' personal finances would enhance your ability to prove wrongdoing. As I mentioned during our telephone conversation, I am willing to look at Mr. Stringham's affidavit in support of the need and I may change my mind. However, under the present circumstances, with the voluminous discovery that has been provided and with Ms. Van De Walker's opinion regarding what transpired, I am not in a position to stipulate to an extension of the disclosure date.

It does appear that the Court could advance all dates by 45 or 60 days and accommodate your request. However, I believe a motion to extend is more appropriate. I will not object to an OST; provided, adequate notice is given. Hopefully, this gives you the direction you need.

M Nelson Segel  
624 South 9th Street  
Las Vegas, Nevada 89101  
(702)385-5266

This email message is a confidential communication that may contain information that is privileged, attorney work product and exempt from disclosure under the law. If the recipient of this message is not the party to whom it is addressed, please immediately notify the sender at (702)385-5266 (collect) and delete this e-mail message and any attachments from your workstation or network mail system.

[illegible]

Sent: Thu 9/2/2010 11:55 AM

I have, at your suggestion, filed a Motion to Extend Expert Deadlines on an OBT. The OBT was granted yesterday, and we will be hand-delivering it to you and Mr. Clary today. The hearing is on 9/14, which as you requested, should give you ample time to respond. I have also filed my Objection to the Discovery Commissioner's Report and Recommendation of 8/15/2019. I have not received a hearing date yet on the Objection.

In the meantime, the Scheduling Order contemplates disclosure of expert reports tomorrow, September 3, 2010. I would like to propose that we briefly extend the disclosure dates to September 17, 2010, to get past the hearing on the Motion to Extend Expert Deadlines. We could also extend rebuttal reports the same two weeks. If the Judge denies my motion to extend the deadlines, then we will serve expert reports on September 17, 2010. If she grants my motion, then we will file the dates to whatever she directs. This minor extension and request will not cause any prejudice to you or your clients, or to your co-defendant and his clients, and is akin to the extension you recently requested, and I agreed to, for the identification of experts.

I have attached a proposed Stipulation for your and Mr. Clary's review. Please advise as soon as possible as to whether you are willing to execute a stipulation for this brief extension pending the outcome of our hearings with Judge Gonzalez. Thank you in advance for your time and professional courtesy in this matter.

Sincerely,  
Jennifer L. Taylor  
Robertson & Vack, LLP  
401 N. Buffalo Dr., Suite 402  
Las Vegas, NV 89148

Office Phone: (704) 247-1661  
Direct Email Address: [ttt408@rttjlaw.net](mailto:ttt408@rttjlaw.net)

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-----Original Message-----

From: M. Nelson Segel (mailto:[nelson@nelsonsegel.com](mailto:nelson@nelsonsegel.com))  
Sent: Thursday, August 19, 2010 5:53 PM  
To: Jennifer L. Taylor  
Cc: Patrick C. Clary  
Subject: Extension of Expert Deadlines

Ms. TAYLOR:













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

6 Attorneys for Plaintiffs

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8

DISTRICT COURT

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CLARK COUNTY, NEVADA

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

16

Plaintiffs,

) **STIPULATION & ORDER EXTENDING**  
) **EXPERT DISCLOSURE DEADLINES**  
)

17

vs.

18

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

22

Defendants,

23

and

24

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

26

Nominal Defendants.

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ROBERTSON  
& VICK, LLP

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Dated: September \_\_\_, 2010                      ROBERTSON & VICK, LLP

Dated: September \_\_, 2010                      M. NELSON SEGEL, CHTD.

Dated: September \_\_, 2010

ROBERTSON  
& VICK, LLP

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**ORDER**

IT IS HEREBY ORDERED that the expert disclosure deadline be extended to September 17, 2010.

DATED this \_\_\_\_\_ day of September, 2010

\_\_\_\_\_  
DISTRICT COURT JUDGE

Submitted by:  
ROBERTSON & VICK, LLP

By \_\_\_\_\_  
ALEXANDER ROBERTSON, IV  
Nevada Bar No. 8642  
JENNIFER L. TAYLOR, ESQ.  
Nevada Bar No. 5798  
401 N. Buffalo Drive, Suite 200  
Las Vegas, Nevada 89145  
Attorneys for PLAINTIFFS

# **EXHIBIT 2**

## Jennifer L. Taylor

---

**From:** Jennifer L. Taylor  
**Sent:** Friday, September 03, 2010 12:25 PM  
**To:** 'nelson@nelsonsegellaw.com'; 'Patrick C. Clary'  
**Subject:** RE: Extension of Expert Deadlines

Mr. Segel:

Thank you for your most recent missive. I do not know what "confusion" you are referring to. You were very clear in our conversation as to your position. I called to discuss with you my client's proposal for a simple two week extension of the expert deadlines to get past the September 14, 2010 hearing on my Motion for a longer extension of expert deadlines and for a ruling on the Objection to the DCRR. I told you that I was requesting my deadline be extended from September 3, 2010 to September 17, 2010, and that rebuttal expert designations would be similarly extended two weeks.

You told me that you weren't going to be stipulating to anything because you were mad about the timing of my motion. I explained to you that with the deadline on the Objection to the DCRR that was the soonest I could the Motion to Extend Discovery Deadlines on file, and I apologized because there was no ill intent in the timing of the filing of my Motion. I explained to you that I was surprised by your unequivocal refusal, given that I thought we had worked cooperatively of late, and that I had wanted to return to giving you the benefit of the doubt on your repeated assertions that you were a reasonable and fair, but zealous advocate. What was particularly troubling was that you admitted I would "probably win" my motion, but you were going to object because if you prevailed, then I would be precluded from proffering any expert opinions. You told me that you wouldn't agree because it severely prejudiced your client and you wanted your summary judgment motions back on for hearing. I asked how a postponement of 2 weeks prejudiced your client, and you simply insisted that it did. You said you would ask your client about the extension, but that you didn't think he would agree. I reminded you that I had granted your client(s) extensions on various other occasions in this litigation above the protests and objections of my clients. You told me you would ask, but assume the answer was "no".

As for your statement that Mr. Clary's position renders your (or your client's) refusal to stipulate moot, while you may not be able to control Mr. Clary in his capacity as a pro per defendant, he does represent the company for which your client, Larry Hahn, serves as President, Treasurer and Director. Therefore, your client should be able to exercise some control over Mr. Clary, as Kokoweef's counsel.

Nonetheless, you have made your position perfectly clear, and I don't have any confusion about your advocacy posture on this matter, in refusing to grant a reasonable, non-prejudicial extension of two weeks in order to resolve an outstanding issue related to the completion of expert reports.

Additionally, I have received your request related to allegedly "illegible documents". Specifically, you write:

I have had an opportunity to briefly review the two motions you provided to me in the last two days. A review of many of the exhibits show that the type is so small that the documents are illegible.

Let this email serve as a request for more legible documents.

I can read all the exhibits unassisted, and, therefore, do not find them illegible. In order to respond to your request, would you please provide more specificity as to exactly which documents you find "illegible"?

Thank you in advance for your time and assistance in this matter.

Sincerely,  
Jennifer L. Taylor

9/3/2010



Robertson & Vick , LLP  
401 N. Buffalo Dr., Suite 202  
Las Vegas, NV 89145

Office Phone (702) 247-4661  
Direct E-mail address: [jtaylor@rvcdlaw.com](mailto:jtaylor@rvcdlaw.com)

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-----Original Message-----

**From:** M Nelson Segel [mailto:[nelson@nelsonsegellaw.com](mailto:nelson@nelsonsegellaw.com)]  
**Sent:** Thursday, September 02, 2010 4:07 PM  
**To:** 'Patrick C. Clary'; Jennifer L. Taylor  
**Subject:** RE: Extension of Expert Deadlines

Ms. Taylor:

Mr. Clary's response makes my clients' position moot. I am certain that you realize I have no control over him.

My confusion during our discussion related to my having reviewed you email via my Blackberry while I was in Court. I must have only read part of it.

M Nelson Segel  
624 South 9th Street  
Las Vegas, Nevada 89101  
(702)385-5266

This email message is a confidential communication that may contain information that is privileged, attorney work product and exempt from disclosure under the law. If the recipient of this message is not the party to whom it is addressed, please immediately notify the sender at (702)385-5266 (collect) and delete this e-mail message and any attachments from your workstation or network mail system.

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**From:** Patrick C. Clary [mailto:[patclary@patclarylaw.com](mailto:patclary@patclarylaw.com)]  
**Sent:** Thursday, September 02, 2010 3:23 PM  
**To:** Jennifer L. Taylor  
**Cc:** [nelson@nelsonsegellaw.com](mailto:nelson@nelsonsegellaw.com)  
**Subject:** RE: Extension of Expert Deadlines

Dear Jennifer:

Your proposed Stipulation was not attached to your email to which this is a reply, but it doesn't matter because I will not agree to sign it.

Sincerely,  
Pat Clary  
Law Offices of Patrick C. Clary, Chartered

9/3/2010

7201 W. Lake Mead Blvd., Suite 410  
Las Vegas, Nevada 89128

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**From:** Jennifer L. Taylor [mailto:jtaylor@RVCDLAW.COM]  
**Sent:** Thursday, September 02, 2010 11:55 AM  
**To:** nelson@nelsonsegellaw.com  
**Cc:** Patrick C. Clary  
**Subject:** RE: Extension of Expert Deadlines

Dear Mr. Segel:

I have, at your suggestion, filed a Motion to Extend Expert Deadlines on an OST. The OST was granted yesterday, and we will be hand-delivering it to you and Mr. Clary today. The hearing is on 9/14, which as you requested, should give you ample time to respond. I have also filed my Objection to the Discovery Commissioner's Report and Recommendation of 8/16/2010. I have not received a hearing date yet on the Objection.

In the meantime, the Scheduling Order contemplates disclosure of expert reports tomorrow, September 3, 2010. I would like to propose that we briefly extend the disclosure dates to September 17, 2010, to get past the hearing on the Motion to Extend Expert Deadlines. We could also extend rebuttal reports the same two weeks. If the Judge denies my motion to extend the deadlines, then we will serve expert reports on September 17, 2010. If she grants my motion, then we will roll the dates to whatever she directs. This minor extension and request will not cause any prejudice to you or your clients, or to your co-defendant and his clients, and is akin to the extension you recently requested, and I agreed to, for the identification of experts.

I have attached a proposed Stipulation for your and Mr. Clary's review. Please advise as soon as possible as to whether you are willing to execute a stipulation for this brief extension pending the outcome of our hearings with Judge Gonzales. Thank you in advance for your time and professional courtesy in this matter.

Sincerely,  
Jennifer L. Taylor  
Robertson & Vick, LLP  
401 N. Buffalo Dr., Suite 202  
Las Vegas, NV 89145

Office Phone (702) 247-4661  
Direct E-mail address: [jtaylor@rvcdlaw.com](mailto:jtaylor@rvcdlaw.com)

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-----Original Message-----

**From:** M Nelson Segel [mailto:nelson@nelsonsegellaw.com]  
**Sent:** Thursday, August 19, 2010 5:53 PM  
**To:** Jennifer L. Taylor  
**Cc:** 'Patrick C. Clary'  
**Subject:** Extension of Expert Deadlines

Ms. Taylor:

I have had an opportunity to consider your request for an extension of time to provide expert reports. As I understand your position, you do not believe that Mr. Stringham can provide a

9/3/2010

report without reviewing the bank accounts and credit card statements of Mr. & Mrs. Hahn, as well as, all of the financial documentation regarding Hahn's World of Surplus, Inc. ("Surplus"). Unfortunately, we do not understand the "need" for this information to enable Mr. Stringham to determine whether wrongful conduct has occurred.

As I understand it, Kokoweef, Inc. has provided your clients, and you, or you have obtained through the subpoenas we did not contest, with copies of all bank statements and checks, including front and back, for Kokoweef. This would enable you to trace all Kokoweef transactions. It should be obvious that much of this disclosure occurred prior to the commencement of the litigation because the original complaint included many checks payable to individuals, endorsed to Surplus and deposited in Surplus' bank account. Clearly, the Plaintiffs would not have been aware of these transactions if Kokoweef had not provided the documentation to them. You have made copies of ALL of the investor files and have the information regarding the moneys raised. It is my understanding that the records of Kokoweef account for all of these transactions.

Under the circumstances, I do not understand how making the intrusive inspection of my clients' personal finances would enhance your ability to prove wrongdoing. As I mentioned during our telephone conversation, I am willing to look at Mr. Stringham's affidavit in support of the need and I may change my mind. However, under the present circumstances, with the voluminous discovery that has been provided and with Ms. Van De Walker's opinion regarding what transpired, I am not in a position to stipulate to an extension of the disclosure date.

It does appear that the Court could advance all dates by 45 or 60 days and accommodate your request. However, I believe a motion to extend is more appropriate. I will not object to an OST; provided, adequate notice is given. Hopefully, this gives you the direction you need.

M Nelson Segel  
624 South 9th Street  
Las Vegas, Nevada 89101  
(702)385-5266

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No virus found in this incoming message.  
Checked by AVG - [www.avg.com](http://www.avg.com)  
Version: 9.0.851 / Virus Database: 271.1.1/3102 - Release Date: 09/01/10 23:34:00

## Jennifer L. Taylor

---

**From:** postmaster@RVCDLAW.COM  
**Sent:** Friday, September 03, 2010 12:25 PM  
**To:** Jennifer L. Taylor  
**Subject:** Delivery Status Notification (Relay)



ATT530683.txt  
(234 B)



RE: Extension of  
Expert Deadli...

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

nelson@nelsonsegellaw.com

## Jennifer L. Taylor

---

**From:** System Administrator  
**To:** Patrick C. Clary  
**Sent:** Friday, September 03, 2010 12:25 PM  
**Subject:** Delivered:RE: Extension of Expert Deadlines

Your message

**To:** nelson@nelsonsegellaw.com; Patrick C. Clary  
**Subject:** RE: Extension of Expert Deadlines  
**Sent:** 9/3/2010 12:25 PM

was delivered to the following recipient(s):

Patrick C. Clary on 9/3/2010 12:25 PM

## Jennifer L. Taylor

---

**From:** nelson@nelsonsegellaw.com  
**Sent:** Friday, September 03, 2010 12:33 PM  
**To:** Jennifer L. Taylor  
**Subject:** Delivered: RE: Extension of Expert Deadlines



ATT530769.txt  
(157 B)

Your message was delivered to the recipient.

# EXHIBIT 3

## Jennifer L. Taylor

---

**From:** Patrick C. Clary [patclary@patclarylaw.com]  
**Sent:** Thursday, September 02, 2010 3:23 PM  
**To:** Jennifer L. Taylor  
**Cc:** nelson@nelsonsegellaw.com  
**Subject:** RE: Extension of Expert Deadlines

Dear Jennifer:

Your proposed Stipulation was not attached to your email to which this is a reply, but it doesn't matter because I will not agree to sign it.

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

---

**From:** Jennifer L. Taylor [mailto:jtaylor@RVCDLAW.COM]  
**Sent:** Thursday, September 02, 2010 11:55 AM  
**To:** nelson@nelsonsegellaw.com  
**Cc:** Patrick C. Clary  
**Subject:** RE: Extension of Expert Deadlines

Dear Mr. Segel:

I have, at your suggestion, filed a Motion to Extend Expert Deadlines on an OST. The OST was granted yesterday, and we will be hand-delivering it to you and Mr. Clary today. The hearing is on 9/14, which as you requested, should give you ample time to respond. I have also filed my Objection to the Discovery Commissioner's Report and Recommendation of 8/16/2010. I have not received a hearing date yet on the Objection.

In the meantime, the Scheduling Order contemplates disclosure of expert reports tomorrow, September 3, 2010. I would like to propose that we briefly extend the disclosure dates to September 17, 2010, to get past the hearing on the Motion to Extend Expert Deadlines. We could also extend rebuttal reports the same two weeks. If the Judge denies my motion to extend the deadlines, then we will serve expert reports on September 17, 2010. If she grants my motion, then we will roll the dates to whatever she directs. This minor extension and request will not cause any prejudice to you or your clients, or to your co-defendant and his clients, and is akin to the extension you recently requested, and I agreed to, for the identification of experts.

I have attached a proposed Stipulation for your and Mr. Clary's review. Please advise as soon as possible as to whether you are willing to execute a stipulation for this brief extension pending the outcome of our hearings with Judge Gonzales. Thank you in advance for your time and professional courtesy in this matter.

Sincerely,  
Jennifer L. Taylor  
Robertson & Vick, LLP  
401 N. Buffalo Dr., Suite 202  
Las Vegas, NV 89145

Office Phone (702) 247-4661  
Direct E-mail address: [jtaylor@rvcdlaw.com](mailto:jtaylor@rvcdlaw.com)

9/3/2010



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-----Original Message-----

**From:** M Nelson Segel [mailto:[nelson@nelsonsegellaw.com](mailto:nelson@nelsonsegellaw.com)]

**Sent:** Thursday, August 19, 2010 5:53 PM

**To:** Jennifer L. Taylor

**Cc:** 'Patrick C. Clary'

**Subject:** Extension of Expert Deadlines

Ms. Taylor:

I have had an opportunity to consider your request for an extension of time to provide expert reports. As I understand your position, you do not believe that Mr. Stringham can provide a report without reviewing the bank accounts and credit card statements of Mr. & Mrs. Hahn, as well as, all of the financial documentation regarding Hahn's World of Surplus, Inc. ("Surplus"). Unfortunately, we do not understand the "need" for this information to enable Mr. Stringham to determine whether wrongful conduct has occurred.

As I understand it, Kokoweef, Inc. has provided your clients, and you, or you have obtained through the subpoenas we did not contest, with copies of all bank statements and checks, including front and back, for Kokoweef. This would enable you to trace all Kokoweef transactions. It should be obvious that much of this disclosure occurred prior to the commencement of the litigation because the original complaint included many checks payable to individuals, endorsed to Surplus and deposited in Surplus' bank account. Clearly, the Plaintiffs would not have been aware of these transactions if Kokoweef had not provided the documentation to them. You have made copies of ALL of the investor files and have the information regarding the moneys raised. It is my understanding that the records of Kokoweef account for all of these transactions.

Under the circumstances, I do not understand how making the intrusive inspection of my clients' personal finances would enhance your ability to prove wrongdoing. As I mentioned during our telephone conversation, I am willing to look at Mr. Stringham's affidavit in support of the need and I may change my mind. However, under the present circumstances, with the voluminous discovery that has been provided and with Ms. Van De Walker's opinion regarding what transpired, I am not in a position to stipulate to an extension of the disclosure date.

It does appear that the Court could advance all dates by 45 or 60 days and accommodate your request. However, I believe a motion to extend is more appropriate. I will not object to an OST; provided, adequate notice is given. Hopefully, this gives you the direction you need.

M Nelson Segel  
624 South 9th Street  
Las Vegas, Nevada 89101  
(702)385-5266

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9/3/2010

# EXHIBIT 4

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

8 DISTRICT COURT  
9 CLARK COUNTY, NEVADA  
10

11 TED R. BURKE, MICHAEL R. and ) CASE NO. A558629  
12 LAURETTA L. KEHOE; JOHN BERTOLDO; ) Dept. XIII  
13 PAUL BARNARD; EDDY KRAVETZ; )  
14 JACKIE and FRED KRAVETZ; STEVE )  
15 FRANKS; PAULA MARIA BARNARD; )  
LEON GOLDEN; C.A. MURFF; GERDA )  
16 FERN BILLBE; BOB and ROBYN TRESKA; )  
MICHAEL RANDOLPH, and FREDERICK )  
17 WILLIS, ) **PLAINTIFFS' EXPERT DESIGNATION**  
18 Plaintiffs, )  
19 vs. )  
20 LARRY H. HAHN, individually, and as )  
21 President and Treasurer of Kokoweef, Inc., and )  
former President and Treasurer of Explorations )  
22 Incorporated of Nevada; HAHN'S WORLD OF )  
23 SURPLUS, INC., a Nevada corporation; DOES )  
I-X, inclusive; DOE OFFICERS, DIRECTORS )  
and PARTICIPANTS I-XX, )  
24 Defendants,. )  
25 and )  
26 KOKOWEEF, INC, a Nevada corporation; )  
EXPLORATIONS INCORPORATED OF )  
27 NEVADA, a dissolved corporation; )  
28 Nominal Defendants.

1 COMES NOW Plaintiffs, TED R. BURKE, MICHAEL R. and LAURETTA L.  
2 KEHOE; JOHN BERTOLDO; PAUL BARNARD; EDDY KRAVETZ; JACKIE and FRED  
3 KRAVETZ; STEVE FRANKS; PAULA MARIA BARNARD; LEON GOLDEN; C.A. MURFF;  
4 GERDA FERN BILLBE; BOB and ROBYN TRESKA; MICHAEL RANDOLPH, and  
5 FREDERICK WILLIS, ("Plaintiffs"), by and through their attorneys of record, ROBERTSON &  
6 VICK, LLP, and hereby submits its designation of expert witnesses:

7 Plaintiffs are, at this time, only able to designate experts pursuant to NRCP 16.1(2)(B)  
8 because Plaintiffs' Experts are unable to complete their analysis absent a review of the Larry C.  
9 Hahn and Hahn's World of Surplus records, which are the subject of Plaintiffs' pending  
10 Objection to the August 16, 2010 Discovery Commissioner's Report and Recommendation (the  
11 "Objection"). Plaintiffs reserve the right to submit expert reports until after the ruling on  
12 Plaintiffs' pending Objection and on Plaintiffs' Motion to Extend Expert Disclosure and  
13 Discovery Deadlines, currently scheduled for September 14, 2010. Plaintiffs further reserve the  
14 right to supplement this production as discovery continues.

15  
16 **EXPERT WITNESSES**

- 17 1. Talon C. Stringham CPA, ABV, CFE, CCE, ASA  
18 Sage Forensic Accounting  
19 3753 Howard Hughes Parkway  
Suite 200  
Las Vegas, Nevada 89169

20 Mr. Stringham will testify as a forensic accounting expert regarding the financial status,  
21 books and records of Defendants and his review of said financial records. Mr. Stringham will be  
22 compensated at his standard billing rate of \$200.00 per hour. Mr. Stringham's CV is attached  
23 hereto as Exhibit 1.

- 24 2. Ed Apenbrink  
25 2708 Beachside Court  
Las Vegas, Nevada 89117

26 Mr. Appenbrink will testify as a securities expert regarding the legal status of securities  
27 sold by Defendants and his review of said securities records. Mr. Apenbrink will be

28 ROBERTSON  
& VICK, LLP

1 compensated at his standard billing rate of \$250.00 per hour. Mr. Apenbrink's CV is attached  
2 hereto as Exhibit 2.

3 As noted above, Plaintiffs reserve the right to supplement this list of expert witnesses as  
4 necessary during the course of discovery of this matter.

5 DATED: September 3, 2010

ROBERTSON & VICK, LLP

6  
7 By: 

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

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28 ROBERTSON  
& VICK, LLP

**Exhibit 1**

## EXHIBIT 1: TALON C. STRINGHAM CURRICULA VITAE AND TESTIFYING EXPERIENCE



Talon C. Stringham has over 10 years of professional experience including providing litigation support services, expert witness testimony, forensic and investigative accounting, economic loss calculations, and business valuation services. He is one of only a few professionals in Utah to have formal training, expertise, and experience in forensic, or investigative accounting, business valuation and computer forensics.

The following is a summary of Mr. Stringham's business valuation, investigative accounting, bankruptcy/liquidation, economic loss calculation, personal injury, patent infringement, computer forensics, and general litigation experience.

### **Business Valuations**

- Calculated the value of closely held companies in a wide variety of industries for a wide variety of purposes, including gift and estate tax planning, ESOP valuations, divorce settlements, shareholder disputes, and other litigation situations.
- Informed as to the rules and processes that guide appraisals. Experienced in performing appraisals in both contentious and cooperative environments.
- Performed an appraisal of a heavy-duty truck brake company in a California Anti-Trust case that involved elements of both lost profits and destruction of business.
- Performed an appraisal of a satellite communications provider whose owners were involved in a shareholder dispute. The company, a U.S. government subcontractor, provides satellite communication services for the U.S. government around the world.
- Performed five separate appraisals for three different companies involved in the paper mill industry in a Washington legal malpractice case.
- Performed a combined appraisal of seven different adult entertainment oriented nightclubs for a Utah divorce case.
- Performed appraisals of various automobile dealerships throughout the Intermountain area.
- Performed appraisals of various construction and real estate development companies, including companies with sales in excess \$100 million.
- Performed appraisals of various professional services firms, including a CPA practice and an engineering/architectural firm for divorce settlement purposes.
- Performed numerous appraisals of family limited partnerships and holding companies for gift and estate tax planning.
- Performed an appraisal of an educational film company involved in a shareholder dispute.
- Performed an appraisal of a parcel insurance provider involved in a shareholder dispute.

### **Forensic/Investigative Accounting**

- Supervised and performed reconstruction of accounting records as a result of theft, floods, fires, and other natural disasters.
- Supervised and performed investigative accounting work for criminal fraud trials and claims.
- Supervised and performed investigative accounting services on the assets of marital estates in divorce cases.
- Supervised and performed investigative accounting services on officers and directors litigation and partnership disputes.
- Performed investigative accounting work related to accountants malpractice litigation.

### **Bankruptcy/Liquidations**

- Performed analysis related to alter ego in fraudulent conveyance and substantive consolidation proceedings.
- Supervised and performed an asset tracing analysis related to cash held in a constructive trust action.

### **Economic Loss Calculation**

- Calculated losses due to business interruption for a wide variety of industries on various insurance claims.
- Assisted both plaintiff and defense attorneys with analysis of various economic loss situations.
- Prepared economic loss calculation for a large coal mining loss in Central Utah.

### **Personal Injury, Wrongful Death and Wrongful Termination**

- Prepared analyses for a wide variety of individuals in personal injury, wrongful death, and wrongful termination cases.

### **Patent Infringement**

- Analyzed and performed damage calculations for various patent infringement claims, including the performance of elasticity of demand analyses.
- Performed analyses for litigation involving an exercise equipment patent.
- Performed analyses for litigation involving computer equipment.
- Perform an analysis for litigation involving cushioning materials patents.

### **Computer Forensic Services**

- Familiar with software and methodologies related to the recovery of electronic evidence.
- Recovered electronic evidence on a variety of electronic media for use in divorce cases.
- Recovered electronic evidence on electronic media for use in employment law actions.

### **General Litigation Services**

- Analyzed and performed damage calculation on anti-trust cases.
- Computed damages related to contract disputes.
- Computed damages on intellectual property cases.
- Computed damages involving losses associated with construction contracts.
- Computed damages on many different cases involving lost business profits.

### **Sample Industry Experience**

Advertising	Agriculture	Building Materials	Coal Mining
Construction	Computer	Educational Multi-Media	Entertainment
	Software/Hardware		
Forestry	Glass	Hardware	Hospitality
Insurance	Internet Commerce	Medical Supplies	Multi-Level Marketing
Nutritional Supplements	Real Estate	Residential Treatment Center	Restaurant/Bars
Satellite Communications	Services	Telemarketing	Tooth Whitening

### **Educational Qualifications**

Mr. Stringham earned a Bachelor of Arts degree in Accounting and a Master of Science degree in Accounting, with an emphasis in Finance, from Utah State University.

### **Professional Credentials, Affiliations and Activities**

- Certified Public Accountant (CPA), licensed in Idaho, Nevada and Utah



- Accredited Senior Appraiser (ASA) of the American Society of Appraisers
- Certified Fraud Examiner (CFE) of the Association of Certified Fraud Examiners
- Accredited in Business Valuation (ABV) from the AICPA
- Certified in Financial Forensics (CFF) from the AICPA
- Certified Information Technology Professional (CITP) from the AICPA
- Certified Computer Examiner (CCE) from the ISFCE
- EnCase Certified Examiner (EnCE) from Guidance Software
- Member of the American Institute of Certified Public Accountants (AICPA)
- Member of the Utah Association of Certified Public Accountants (UACPA)
- Chair, UACPA Business Valuation Committee, 2004
- Treasurer, Utah Chapter of Certified Fraud Examiners, 2004 - present

#### **Publications and Courses Taught**

- Author of "Fair Value in Utah," THE UTAH BAR JOURNAL (December 2003)
- Author of "Valuation Discounts for Holding Companies," THE JOURNAL ENTRY (October 2005)
- Author of "Personal Injury: How Much for How Long?" THE JOURNAL ENTRY (November 2005)
- Presented continuing legal education course on Discovering Hidden Assets
- Presented continuing legal education course on Understanding Business Valuations

#### **Testifying Experience**

Case Name	Law Firm	Client/Attorney	Court
Advanced Comfort Technology, Inc. v. Edizone LC, et al.	Berman & Savage, P.C.	E. Scott Savage	Third Judicial District Court, Salt Lake County, Utah
Burke, et al v. Hahn & Kokoweef, Inc., et al.	Neil J. Beller, LTD.	Neil J. Beller	District Court, Clark County, Nevada
SkyPark Airport Association, LLC, et al. v. Jensen, et al.	Dunn & Dunn	Kevin D. Swenson	Second Judicial District Court, Davis County

## Exhibit 2

EDWIN J. APENBRINK  
2708 Beachside Court  
Las Vegas, Nevada 89117  
(702) 255-4320

SENIOR STATE REGULATION OF SECURITIES ATTORNEY

Thirty-five years experience in working with and for government agencies and regulatory bodies.

Experienced in:

- |   |                                   |   |                               |
|---|-----------------------------------|---|-------------------------------|
| * | State Securities Law              | * | Broker Dealer Registration    |
| * | Financial & Business Transactions | * | Initial Public Offerings      |
| * | Government Relations              | * | Investment Company Regulation |

CAREER SUMMARY

State of Nevada, Securities Division - Las Vegas, Nevada 1992-2008

DIRECTOR OF SECURITIES REGISTRATION & LICENSING

Worked with State Regulatory Agency.

- \* Supervised personnel, policies and procedures in the Registration and Licensing section.
- \* Reviewed and approved or denied applications for registration of securities.
- \* Reviewed and approved applications for licensure of broker dealers, sales representatives, investment advisors, and investment advisor representatives.
- \* Supervised staff of compliance audit investigators in monitoring broker dealers and investment advisors, reviewed reports on such audits, reviewed and approved exit letters.
- \* Researched and drafted position papers, opinions and no-action letters.
- \* Participated in drafting amendments to statute and rules and regulations.

Calfee, Halter & Griswold - Cleveland, Ohio

1987-1991

SENIOR ASSOCIATE

Managed State Regulation of Securities Department .

- \* Dealt with regulators and government officials in all 53 jurisdictions in order to gain registration of securities on behalf of regional underwriter. Industries covered were Industrial instrumentation, auto leasing, household applications.
- \* Arranged for private placement of securities in all 53 jurisdictions by negotiating approvals and clearances with agency administrators.
- \* Qualified employee benefit plans, i.e. 401K pension, profit-sharing plans, with Appropriate agencies.
- \* Gained clearances and perfected exemptions for general obligation bonds and conduit Financings issued by public bodies and agencies.
- \* Drafted documents relative to the above.

King & Spalding - Atlanta, Georgia

1986-1987

**SENIOR ASSOCIATE**

Established, recruited, trained and supervised staff of State Regulation of Securities Department.

- \* Dealt with regulators and government officials in all 53 jurisdictions in order to gain registration of initial public offerings of securities on behalf of regional underwriter. Industries covered were trucking, textile, retail clothing, cellular communications, underground construction.
- \* Arranged private placement of securities in all 53 jurisdictions by negotiating approvals And clearances with agency administrators.
- \* Qualified employee benefit plans, i.e. 401K pension, profit -sharing plans, with appropriate agencies.
- \* Drafted documents relative to the above.

Strook & Strook & Lavan - New York, New York

1985

**SENIOR ASSOCIATE**

Established, recruited, trained and supervised staff of State Regulation of Securities Department.

- \* Dealt with regulators and government officials in all 53 jurisdictions in order to gain registration of securities on behalf of national underwriter. Industries covered were banking and land development (private).
- \* Arranged private placement of complicated tax-sheltered securities in all 53 jurisdictions.
- \* Drafted documents relative to the above.

Winthrop, Stimson, Putnam & Roberts - New York, New York

1979-

1985

**SENIOR ASSOCIATE**

Managed State Regulation of Securities Department.

- \* Dealt with regulators and government officials in all 53 jurisdictions in order to gain registration of securities on behalf of national underwriter. Industries covered were public utilities, medical instruments, gaming or recreational, mining and Home Depot stores.
- \* Arranged private placement of securities in all 53 jurisdictions by negotiating approvals and clearances with agency administrators.
- \* Qualified employee benefit plans, i.e. 401K, pension, profit sharing plans, with appropriate agencies.
- \* Drafted documents relative to the above.

State of Illinois, Securities Division - Springfield, Illinois

1974-1979

Worked with State Regulatory Agency.

- \* Examined proposed offerings of debt, equity and tax-sheltered securities.
- \* Drafted proposed legislation and held hearings with appropriate committees of the State House and Senate;
- \* Drafted rules and regulations, held public hearings and kept them current.
- \* Investigated possible violations of the Securities Act.
- \* Prepared opinion letters for the Agency.
- \* Served as Hearing Officer in enforcement actions under the Securities Act.

#### EDUCATION

B.A. - St. Louis University (1968)  
J.D. - St. Louis University School of Law(1971)

#### PROFESSIONAL AFFILIATIONS

American Bar Association;  
Past member of Business Law Section -  
    Committee on State regulation of Securities;  
        Subcommittee on Investment Company Management;  
        Subcommittee on Simplification of Capital Formation; and  
        Subcommittee on Disclosure Standards.

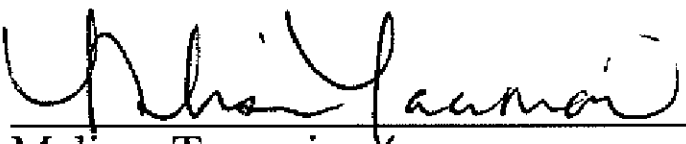
Missouri Bar Association  
Illinois Bar Association  
New York Bar Association  
Georgia Bar Association  
Ohio Bar Association

**CERTIFICATE OF MAILING**

I hereby certify that on the 3rd day of September, 2010, service of the foregoing  
**PLAINTIFF'S EXPERT DESIGNATION** was made this date by depositing a copy thereof for  
mailing at Las Vegas, Nevada, postage prepaid, addressed to:

M. Nelson Segel, Chartered  
M. Nelson Segel, Esq.  
624 South 9<sup>th</sup> Street  
Las Vegas, NV 89101  
Telephone: (702) 385-6266  
Facsimile: (702) 382-2967  
**Attorneys for Larry Hahn and  
Hahn's World of Surplus, Inc.**

Patrick C. Clary, Chartered  
Patrick C. Clary, Esq.  
7201 West Lake Mead Blvd., Suite 410  
Las Vegas, NV 89129  
Telephone: (702) 382-0813  
Facsimile: (702) 382-7277  
**Attorneys for Kokoweef, Inc.**

  
\_\_\_\_\_  
Melissa Taamai