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Nevada Bar No. 11427

2 **ALEX GHIBAUDO, ESQ.**

3 Nevada Bar No. 10592

NOGGLE LAW

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8 *Attorneys for Appellant*

Electronically Filed
May 03 2016 08:48 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

9 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

10 *****

11 KENNETH RENFROE,

) Supreme Court No.: 68907

) District Court No.: A-14-700520-C

12 Appellant,

)

)

13 vs.

)

)

14 LAKEVIEW LOAN SERVICE LLC.,)

)

15 Respondent.

)

16)

17
18 **SECOND SUPPLEMENTAL RESPONSE**

19
20 COMES NOW, Kenneth Renfroe ("Appellant"), through his attorney Alex
21 Ghibaud, Esq., of Noggle Law, and files his second supplemental response.

22 **POINTS AND AUTHORITIES**

23
24 This Court has suspended briefing in the above entitled matter because, at
25 the time of filing, not all the parties to the matter were dismissed from the case.
26 Specifically, Brian Ferguson and Jennifer Ferguson. As such, the Court issued an
27 Order to Show Cause why the appeal should not be dismissed. In response,
28

undersigned counsel indicated, as suggested by this court, that entry of default judgment would be forthcoming. Since then, a "prove-up" hearing was held and default judgment was entered against Brian and Jennifer Ferguson. An order was drafted and subsequently sent to Department III in the Eighth Judicial District Court.

Since then, the order entering default judgment against Brian Ferguson and Jennifer Ferguson has been entered, filed, and a notice of entry of order sent to all relevant parties.¹

DATED this 23rd day of April, 2016.

NOGGLE LAW

/s/ Alex Ghibaudo

ALEX GHIBAUDO, ESQ.

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Attorneys for Appellant

¹ See Exhibit 1, Order Entering Default Judgment.

CERTIFICATE OF SERVICE

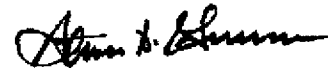
Pursuant to NRAP 25, on April 23rd, 2016 the SECOND
SUPPLEMENTAL RESPONSE was served upon each of the parties to appeal
68907 via electronic service through the Supreme Court of Nevada's electronic
filing.

/s/ Alex Ghibauda, Esq.

An Employee of NOGGLE LAW, PLLC

NOGGLE LAW
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Las Vegas, Nevada 89119

EXHIBIT 1



CLERK OF THE COURT

1 NEO

2 ROBERT B. NOGGLE, ESQ.

3 Nevada Bar No.: 11427

4 NOGGLE LAW PLLC

5 376 East Warm Springs Rd., Ste. 140

6 Las Vegas, Nevada 89119

7 PH: 702-450-6300 | Fax: 702-642-9766

8 Attorney for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

9 KENNETH RENFROE.

10 Plaintiff,

11 vs.

CASE NO.: A-14-700520-C

DEPT NO.: III

NOTICE OF ENTRY OF ORDER

12 LAKEVIEW LOAN SERVICING, LLC;
13 RECONTRUST COMPANY, N.A.; BRIAN J.
14 FERGUSON AND JENNIFER L. FERGUSON;

15 Defendants.

16 TO: ALL INTERESTED PARTIES:

17 PLEASE TAKE NOTICE that an **ORDER GRANTING JUDGMENT BY DEFAULT** has
18 been entered on the 18th day of March, 2016, in the above captioned matter, a copy of which is
19 attached hereto as **Exhibit 1**.

20 DATED this 24th day of March, 2016.

21 NOGGLE LAW PLLC

22 By: / s / Robert B. Noggle, Esq. /

23 Robert B. Noggle, Esq.

24 376 East Warm Springs Road, Ste. 140

25 Las Vegas, Nevada 89119

26 Attorney for Plaintiff

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP, NEFCR 9, and EDCR 8.05, I hereby certify that I am an employee of
3 NOGGLE LAW PLLC and on the 24th day of March, 2016, an electronic copy of the foregoing
4 **NOTICE OF ENTRY OF ORDER** was served on Opposing Counsel via the Court's electronic
5 service system to the following counsel of record:
6

7 **E-Service Master List**
8 **For Case**

9 **Akerman LLP**

10 **Contact**

Akerman Las Vegas Office

Natalie L. Winslow, Esq.

Email

akermanlas@akerman.com

natalie.winslow@akerman.com

11
12 DATED this 24th day of March, 2016.

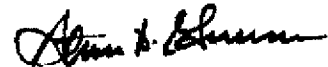
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14 /s/ Anna Shurova /
15 An Employee of NOGGLE LAW PLLC
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EXHIBIT 1

EXHIBIT 1

1 **OGM**

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3 Nevada Bar No.: 11427
4 Alex Ghibaud, Esq.
5 Nevada Bar No.: 10592
6 NOGGLE LAW PLLC
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9 PH: 702-450-6300/Fax: 702-642-9766
10 *Attorney for Plaintiff*



CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

9 KENNETH RENFROE,

11 Plaintiff,

12 vs.

13 LAKEVIEW LOAN SERVICING, LLC;
14 RECONTRUST COMPANY, N.A.; BRIAN J.
15 FERGUSON AND JENNIFER L. FERGUSON;

16 Defendants.

CASE NO.: A-14-700520-C
DEPT NO.: III

**ORDER GRANTING JUDGMENT BY
DEFAULT**

17 The Court having considered Plaintiff, Kenneth Renfro's Ex Parte Application for Judgment
18 by Default and the oral argument of counsel with no opposition, the Court finds as follows:

- 19 1. Defaults were entered against Defendants Brian Ferguson and Jennifer Ferguson on
20 November 24, 2014 and November 14, 2014, respectively;
21
22 2. That Default Judgments were never requested or entered against those Defendants.

23 ///

24 ///

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1 3. That no answer or other appearance having been filed and no further time having been
2 granted, the Default Judgment(s) of Brian Ferguson and Jennifer Ferguson for failing to
3 answer or otherwise plead to the Plaintiff's complaint are hereby GRANTED.
4

5
6 DATED this 14 day of March, 2016.

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9
10 
DISTRICT COURT JUDGE

11 Submitted by:

12 NOGGLE LAW

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14 
15 ALEX GHI BAUDO, ESQ.
16 Nevada Bar No. 12355
17 376 E. Warm Springs Road
Suite 140
Las Vegas, Nevada 89119
Attorneys for Plaintiff
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