

CLERK OF THE COURT

1 TDN
2 Kelly J. Brinkman, Esq.
3 Nevada Bar No. 6238
4 GOOLD PATTERSON
5 1975 Village Center Circle, Suite 140
6 Las Vegas, Nevada 89134
7 (702) 436-2600 (Telephone)
8 (702) 436-2650 (Fax)
9 kbrinkman@gooldpatterson.com
10 *Attorneys for Plaintiff*

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 B.E. UNO, LLC, a Nevada limited liability
10 company,

11 Plaintiff,

12 vs.

13 FAMSA, INC., a California corporation;
14 GRUPO FAMSA, S.A. de C.V., a Mexican
15 corporation,

16 Defendants.

CASE NO.: A-14-706336-C

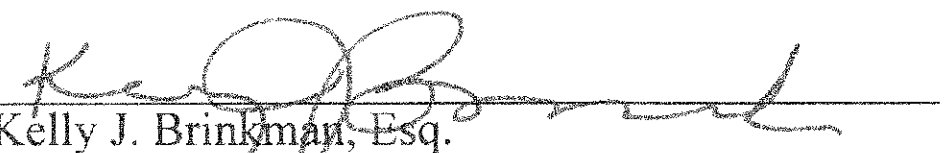
DEPT. NO.: XXXII

**THREE (3) DAY NOTICE OF INTENT
TO TAKE DEFAULT UPON
DEFENDANT GRUPO FAMSA, S.A. DE
C.V.**

17 PLEASE TAKE NOTICE that three (3) days from the date of mailing of this Notice as
18 shown herein, if Defendant Grupo Famsa, S.A. de C.V., a Mexican corporation, does not file a
19 responsive pleading, Plaintiff will enter its Default and thereafter, without further notice, request
20 the Court to enter Judgment.

21 DATED this 13th day of November, 2015.

22 GOOLD PATTERSON

23
24 By: 
25 Kelly J. Brinkman, Esq.
26 Nevada Bar No. 6238
27 1975 Village Center Circle, Suite 140
28 Las Vegas, Nevada 89134
Attorneys for Plaintiff

GOOLD PATTERSON
1975 VILLAGE CENTER CIRCLE, SUITE 140
LAS VEGAS, NEVADA 89134
(702) 436-2600 FAX: (702) 436-2650

CERTIFICATE OF MAILING

I hereby certify that I am an employee of the law firm of Goold Patterson, and on the 13th day of November, 2015, I served the foregoing THREE (3) DAY NOTICE OF INTENT TO TAKE DEFAULT UPON DEFENDANT GRUPO FAMSA, S.A. DE C.V. by enclosing a true and correct copy of the same in a sealed envelope, postage fully pre-paid thereon, and depositing said envelope in a mailbox of the United States Post Office, addressed as follows:

Christopher Byrd, Esq.
FENNEMORE CRAIG, P.C.
300 S. Fourth Street, Suite 1400
Las Vegas, NV 89101
*Attorneys for Defendant, Famsa, Inc.
and Grupo Famsa, S.A. de C.V.*


An employee of Goold Patterson

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

2 GRUPO FAMSA, S.A. DE C.V., a
3 Mexican corporation,

4 Petitioner and Defendant,

5 v.

6 THE EIGHTH JUDICIAL DISTRICT
7 COURT of the State of Nevada, in and for
8 the County of Clark, and THE
9 HONORABLE ROB BARE, District
10 Court Judge,

11 Respondents,

12 B.E. UNO, LLC, a Nevada limited
13 liability company,

14 Plaintiff,

CASE NO: 69119

Electronically Filed
Nov 23 2015 08:52 a.m.
District Court Case No. A-14-706336-C
Clerk of Supreme Court
Case No. A-14-706336-C
Clerk of Supreme Court

15 **PETITIONER'S SECOND SUPPLEMENTAL APPENDIX TO PETITION FOR**
16 **WRIT OF MANDAMUS**

17 Christopher Byrd, Esq. (No. 1633)
18 Daniel Nubel, Esq. (No. 13553)
19 **FENNEMORE CRAIG, P.C.**
20 300 S. Fourth Street Suite 1400
21 Las Vegas, NV 89101
22 Telephone: (702) 692-8000
23 Facsimile: (702) 692-8099
24 Attorneys for Petitioner

25 *In association with:*

26 **LEVINSON ARSHONSKY & KURTZ,**
27 **LLP**
28 Richard I. Arshonsky, Esq. (No. 4518)
15303 Ventura Blvd., Suite 1650
Sherman Oaks, CA 91403
Telephone: (818) 382-3434
Facsimile: (818) 382-3433
Attorneys for Petitioner

PETITIONER'S SECOND SUPPLEMENTAL APPENDIX TO PETITION FOR WRIT OF MANDAMUS

DOCUMENTS

**BATES
STAMP NO.**

1. Complaint dated December 3, 2012 0001-0009
2. Order Granting Motion to Quash dated March 18, 2014 0010-0013
3. Judgment dated April 28, 2014 0014-0018
4. Complaint dated August 29, 2014 0019-0027
5. Defendant Grupo FAMSA, S.A., DE C.V.'s Motion to Quash Service of Process dated June 1, 2015 0028-0035
6. Order Denying Defendant Grupo FAMSA's Motion for Order to Quash Service of Process and Setting Deadline to File an Answer to Complaint dated August 4, 2015 0036-0039
7. Defendant Grupo FAMSA, S.A. DE C.V.'s Motion to Stay All Proceedings Relating to Grupo FAMSA, S.A. DE C.V. Pending Outcome of Petition for Writ of Prohibition on an Order Shortening Time dated August 7, 2015 0040-0046
8. Petition for Writ of Prohibition dated August 14, 2015 0047-0067
9. Order Denying Defendant Grupo FAMSA's Motion to Stay All Proceedings Related to Grupo FAMSA, S.A. DE C.V. Pending Outcome of Writ of Prohibition dated August 19, 2015 0068-0069
10. Order Granting Temporary Stay and Directing Answer dated August 21, 2015 0070-0073
11. Real Party in Interest/Plaintiff's Opposition to Petitioner's Emergency Motion Under NRAP 27(e) to Stay Proceedings Against Petitioner Pending Resolution of Writ Petition Challenging Service of Process on Due Process Grounds dated August 24, 2015 0074-0081

1	12. Plaintiff's Motion for Order Fixing Supersedeas Bond in	0082-0087
2	Connection With Temporary Stay Pending Writ of	
3	Prohibition in Favor of Grupo FAMSA, S.A. DE C.V. on an	
4	Order Shortening Time; Declaration of Kelly J. Brinkman in	
5	Support dated October 14, 2015	
6	13. Defendant Grupo FAMSA, S.A. de C.V.'s Opposition to	0088-0092
7	Plaintiff B.E. Uno, LLC's Motion for Order Fixing	
8	Supersedeas Bond in Connection with Temporary Stay	
9	Pending Writ of Prohibition dated October 23, 2015	
10	14. Plaintiff's Reply in Support of its Motion for Order Fixing	0093-0099
11	Supersedeas Bond in Connection with Temporary Stay;	
12	Declaration of Warren Kellogg in Support dated October 27,	
13	2015	
14	15. Transcript of Proceedings dated November 2, 2015	0100-0118
15	16. Order Fixing Supersedeas Bond in Connection with	0119-0121
16	Temporary Stay Pending Writ of Prohibition in Favor of	
17	Grupo FAMSA, S.A. DE C.V. dated November 3, 2015	
18	17. Notice of Entry of Order regarding Stipulated Protective	0122-0133
19	Order dated November 5, 2015	
20	18. File-stamped Order Fixing Supersedeas Bond in Connection	0134-0136
21	with Temporary Stay Pending Writ of Prohibition in Favor	
22	of Grupo FAMSA, S.A. DE C.V. dated November 10, 2015	
23	19. Three (3) Day Notice of Intent to Take Default Upon	0137-0138
24	Defendant Grupo FAMSA, S.A. DE C.V. dated	
25	November 13, 2015	
26		
27		
28		