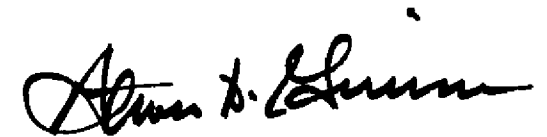


Exhibit K



CLERK OF THE COURT

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
Schwartz Flansburg PLLC
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; GO
GLOBAL, INC., a Nevada corporation, as
assignee of interests of THE ALEXANDER
CHRISTOPHER TRUST, a Trust established in
Nevada; NANYAH VEGAS, LLC, a Nevada
limited liability company,

Plaintiffs,

v.

SIG ROGICH aka SIGMUND ROGICH as
Trustee of The Rogich Family Irrevocable Trust;
ELDORADO HILLS, LLC, a Nevada limited
liability company; DOES I-X; and/or ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. A-13-686303-C

Dept. XXVII

**PLAINTIFFS' (A) REPLY TO
DEFENDANTS' OPPOSITION TO
MOTION FOR RECONSIDERATION
OR RELIEF FROM ORDER
GRANTING MOTION FOR PARTIAL
SUMMARY JUDGMENT; AND (B)
REQUEST FOR ORAL ARGUMENT**

**PLAINTIFFS (A) REPLY TO DEFENDANTS' OPPOSITION
TO MOTION FOR RECONSIDERATION OR RELIEF FROM
ORDER GRANTING MOTION FOR PARTIAL SUMMARY
JUDGMENT AND (B) REQUEST FOR ORAL ARGUMENT**

Plaintiffs Carlos A. Huerta and Go Global, Inc., as assignee of the interests and claims of
The Alexander Christopher Trust, a Trust established in Nevada (collectively, the "**Plaintiffs**"),
by and through their attorneys of record, Schwartz Flansburg PLLC, hereby file their (a) reply
(the "**Reply**") to the opposition of Sig Rogich, aka Sigmund Rogich, as Trustee of The Rogich

1 Family Irrevocable Trust (“**Rogich**” or the “**Defendant**”) to the Plaintiffs’ Motion for
2 Reconsideration or Relief from Order Granting Motion for Partial Summary Judgment; and (b)
3 request for oral argument (the “**Motion**”)¹ and request this Court set a hearing for oral argument
4 on the same. This Reply is made and based upon the pleadings and papers on file herein, the
5 following Memorandum of Points & Authorities, and any oral argument entertained by the Court
6 at the time of the hearing on this matter.
7
8

9 Dated this 22nd day of March, 2016.

10 SCHWARTZ FLANSBURG PLLC

11
12 By: /s/ Samuel A. Schwartz
13 Samuel A. Schwartz, Esq.
14 Nevada Bar No. 10985
15 Bryan A. Lindsey, Esq.
16 Nevada Bar No. 10662
17 Schwartz Flansburg PLLC
18 6623 Las Vegas Blvd. South, Suite 300
19 Las Vegas, Nevada 89119
20 Attorneys for Plaintiffs

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 **Preliminary Statement**

23 1. Similar to his previous strategy in this case, Rogich primarily opposes the Motion
24 on procedural issues. As set forth herein, this Court has a procedural basis to reconsider its prior
25 Partial Summary Judgment Order under NRCP 54(b) and NRCP 60(b). Indeed, the 6 month
26 time limit in NRCP 60(b) does not apply to sections 4 (judgment is void) and 5 (manifest
27 injustice, no longer equitable to enforce the order).

28 2. Turning to the substantive issues, the Motion provides evidence creditors were
paid in full, and to the extent this Court requires additional evidence, such evidence is attached

1 Capitalized terms not otherwise defined herein shall have those meanings ascribed to
them in the Motion.

1 hereto. Importantly, Rogich's statements regarding allegations that the Plaintiffs' creditors were
2 "grossly prejudiced" does not even remotely reflect the record in the Bankruptcy Court and the
3 fact that all impaired classes of creditors in the Plaintiffs' bankruptcy case voted to accept the
4 Chapter 11 Plan.

5
6 3. Finally, this Court's Prior Summary Judgment Order must be reconsidered
7 because the Bankruptcy Order's prior disclosure statement order, which found the Disclosure
8 Statement to contain "adequate information" as required by 11 U.S.C. § 1125, operates as res
9 judicata to Rogich's previous arguments, as is an order for which this Court must give full faith
10 and credit to pursuant to 28 U.S.C. § 157. In fact, this Court did not even have jurisdiction to
11 rule whether the Disclosure Statement contained adequate information, as only the Bankruptcy
12 Court is the proper jurisdiction to determine such issues. Accordingly, the Plaintiffs' Motion
13 should be granted.
14
15
16

17 Argument

18 **A. Current Procedural Posture and Applicable Standard.**

19 **This Court May Reconsider the Partial Summary Judgment Order Under NRCP 54(b).**

20
21 4. Rogich first opposes the Plaintiffs' Motion and argues this Court's prior Order
22 cannot be reconsidered under NRCP 54(b) because: (i) the fourth claim of Nanyah Vegas, LLC
23 ("Nanyah") in the action is "totally separate and misjoined" from the Plaintiffs' claims; and (ii)
24 this Court entered a Final Judgment against the Plaintiffs on February 23, 2015 (see Opposition,
25 Exhibit 7). Rogich is incorrect on both accounts.
26
27

28 5. First, Rogich cites no rule, statute or case law to support his position that
Nanyah's claims were totally separate and misjoined from the Plaintiffs' claims, rather, Rogich
simply states the claims were litigated separately, decided separately, and appealed separately.

1 6. The flaw in Rogich's argument, however, is that while it made sense from a
2 procedural standpoint to litigate the claims of Nanyah and the Plaintiffs' separately, all claims of
3 Nanyah and the Plaintiffs' arise from the same set of facts and transactions. Accordingly, a
4 claim cannot be certified by the court as final if it arises from the same set of facts and
5 transactions that gave rise to other claims in the action. KDI Sylvan Pools, Inc. v. Workman,
6 107 Nev. 340, 343, 810 P.2d 1217, 1219 (1991).
7

8
9 7. Second, while Rogich cites to this Court's entry of Final Judgment against the
10 Plaintiffs, the Final Judgment, which did not adjudicate the claims of Nanyah, can only be
11 entered upon the court's express determination that "there is no reason for delay." NRCP 54(b);
12 Rae v. All American Life and Cas. Co., 95 Nev. 920, 922, 605 P.2d 196, 197 (1979).
13

14
15 8. Here, the Final Order entered by this Court on February 23, 2015, does not
16 contain the express language that "there is no reason for delay." Importantly, as the Nanyah
17 judgment was reversed by the Nevada Supreme Court,² this Court has not adjudicated all of the
18 claims in this case. See Butler v. Eaton, 141 U.S. 240, 244 (1891) (explaining that a judgment
19 reversed by a higher court is "without any validity, force, or effect, and ought to have never
20 existed"). Therefore, the Order against the Plaintiffs is interlocutory, and may be reconsidered
21
22 "at any time" by this Court under NRCP 54(b).
23

24 **This Court May Reconsider the Partial Summary Judgment Order Under NRCP 60(b).**
25

26 9. Rogich's argument against reconsideration under NRCP 54(b) is essentially an
27 equitable argument, citing not rule, statute or case law, regarding his allegations that the claims
28 of Nanyah and the Plaintiffs were totally separate and misjoined. Interestingly, Rogich then

2 After the filing of the Motion, Defendant Rogich filed a Petition for Rehearing in the Nevada Supreme Court regarding the Nanyah Reversal Order. To the extent deemed necessary by this Court, the Plaintiffs consent to a continuance of the Court's decision on the Motion until the Nevada Supreme Court resolves the Petition for Rehearing.

1 argues against reconsideration under NRCP 60(b), based strictly on the 6-month time limit
2 language of the rule. Simply put, Rogich cannot have his cake and eat it too.

3
4 10. As set forth in the Motion, the Order may also be reconsidered under NRCP
5 60(b), which allows the court to reconsider a motion for: (1) mistake, advertence, surprise, or
6 excusable neglect; (2) newly discovered evidence; (3) fraud; (4) a void judgment; and (5) the
7 judgment has been satisfied, released, or discharged, or a prior judgment upon which it is based
8 has been reversed or otherwise vacated, or it is no longer equitable that an injunction should have
9 prospective application.
10

11
12 11. Although provisions (1), (2), and (3) of NRCP 60(b) carry a statutory time
13 restraint, it is proper for a court to “depart from a prior holding if it is convinced that it is clearly
14 erroneous and adhering to it would work a manifest injustice.” Hsu v. County of Clark, 123
15 Nev. 625, 630-32, 173 P.3d 724, 728-729 (2007). A manifest injustice is an observable error that
16 must be reversed because it is the result of overlooked conditions or a subsequent change in
17 circumstance. Hsu, 123 Nev. at 630-32, 173 P.3d at 728-729; Black’s Law Dictionary 1048 (9th
18 ed. 2009).
19
20

21 12. Here, the court Order was based on considerations for the Chapter 11 Bankruptcy
22 matter. That matter, however, is now resolved as the Plaintiffs’ creditors were paid in full.
23 Hence, when the Order was entered, this Court based its decision on the potential effect on the
24 Plaintiffs’ creditors for the non-disclosure of the Plaintiffs’ claims against Rogich. As such,
25 creditors were paid in full and, now, this Court has the power to reconsider its Order to prevent
26 manifest injustice to the Plaintiffs so that this case may be tried on the merits.
27
28

13. Alternatively, the court may also reconsider its Order on the grounds that it is no
longer equitable to enforce it. NRCP 60(b)(5). The time restraint on a motion to reconsider does

1 not apply to NRCP 60(b)(5). Stoecklein v. Johnson Elec., Inc., 109 Nev. 268, 271-272, 849 P.2d
2 305, 308 (1993). Reconsideration under this provision must only be made within a reasonable
3 time, which “can only be determined when considering the facts of each case.” United States v.
4 Holtzman, 762 F.2d 720, 725 (9th Cir. 1985).

6 14. The provision is applicable where the matter involves the same parties and
7 concerns of claim or issue preclusion may arise. Ford v. Branch Banking and Trust Co., 131
8 Nev. Adv. Op. 53, 353 P.3d 1200, 1202 (2015). Regardless of its label, the court categorizes a
9 judgment based on how it functions. Bally’s Grand Hotel & Casino v. Reeves, 112 Nev. 1487,
10 1488, 929 P.2d 936, 937 (1996).

13 15. Here, the Order functions like an injunction because it prevents the Plaintiffs from
14 pursuing their claim. Because the Order functions like an injunction, it is properly classified as
15 such. Also at issue here is Defendants’ inference of claim or issue preclusion. Accordingly,
16 NRCP 60(b)(5) applies, and allows the Court to reconsider its prior Order.

19 **B. The Plaintiffs Paid All Unsecured Creditors In Full.**
20 **The Evidence Demonstrates Plaintiffs’ Creditors Were Paid in Full.**

21 16. Rogich next opposes the substance of the Motion and argues there is no evidence
22 the Plaintiffs’ paid their creditors in full. Despite the declarations of Samuel A. Schwartz and
23 Carlos Huerta in support of the Motion, Rogich argues there is no evidence the creditors were
24 paid.
25

27 17. In addition to the two declarations filed with the Motion, attached hereto as
28 **Exhibit A** contains a spreadsheet (the “**Spreadsheet**”) used by the Plaintiffs to determine the
scheduled and allowed claims in the Plaintiffs’ Chapter 11 bankruptcy cases.

18. Importantly, Carlos Huerta personally paid the claims of creditors indicated as

1 “Paid by Carlos” on the Spreadsheet. See Declaration of Carlos Huerta, attached hereto as
2 **Exhibit B**. Additionally, as indicated in the declaration of Samuel A. Schwartz attached to the
3 Motion, Schwartz Flansburg PLLC issued checks for all remaining creditors listed on the
4 Spreadsheet. Copies of each check, along with a cover letter, are attached hereto to the
5 Declaration of Samuel A. Schwartz, attached hereto as **Exhibit C**.

7
8 **Plaintiffs’ Creditors Were Not Prejudiced by any Failure to Disclose the Rogich Claim.**

9 19. In his Opposition, Rogich also argues that notwithstanding whether Plaintiffs paid
10 their creditors in full, Plaintiffs’ creditors were “grossly prejudiced by the failure of the Plaintiffs
11 to apprise the creditors of their alleged Rogich claim.” See Opposition, p. 5, ll. 14-15. First, if
12 Plaintiffs’ creditors were “grossly prejudiced,” then it appears Rogich admits there is significant
13 merit to Plaintiffs’ claims against him, which supports Plaintiffs’ Motion for Reconsideration to
14 prevent manifest injustice.
15

16
17 20. Second, notwithstanding the above, Plaintiffs’ creditors were not “grossly
18 prejudiced” by any lack of disclosure in the Disclosure Statement, because all impaired classes
19 of creditors voted to accept the Plaintiffs’ Chapter 11 Plan. See Voting Declaration in
20 Bankruptcy Case (the “**Voting Declaration**”), a copy of which is attached hereto as **Exhibit D**.
21 Specifically, the Voting Declaration indicates the Plaintiffs received affirmative votes accepting
22 their Chapter 11 Plan in all creditor classes allowed to vote on the Plan. Id. Thus, regardless of
23 whether the Plaintiffs disclosed that creditors would be paid from recoveries from the Plaintiffs’
24 nearly \$5 million judgment against Hugo Paulson and his related entities (the “**Paulson**
25 **Judgment**”) or whether creditors would be paid from both the Paulson Judgment and the Rogich
26 Claim, creditors’ votes would not have changed, as all impaired creditor classes already voted to
27 accept the Plaintiffs’ Plan. Simply put, disclosure of the Rogich Claim would not have improved
28

1 upon 7 “yes” votes and zero “no” votes for the Plaintiffs’ Plan.

2 **The Glazier Group v. Premium Supply Co., Inc. is Directly on Point.**

3 21. The Glazier Group v. Premium Supply Co., Inc. case is directly on point, despite
4 Rogich’s allegations to the contrary. In fact, Rogich’s attempts to distinguish Glazier are
5 misplaced. In Glazier, the defendant, Premium, sought to dismiss the complaint of the debtor,
6 The Glazier Group (“**Glazier**” or “**GGI**”), based on a theory of judicial estoppel because the
7 claim against Premium was not disclosed in the debtor’s: (i) schedules; and (ii) disclosure
8 statement. The Glazier Group v. Premium Supply Co., Inc., 2013 WL 1727155, *1-2 (N.Y. Sup.
9 2013). The court in Glazier ruled disclosure of the claim was not required in the debtor’s
10 schedules because it arose post-petition. Id. at *2. That difference, as argued by Rogich, is not
11 material here, as the Plaintiffs’ claim against Rogich was disclosed in the Plaintiffs’ schedules.
12

13 22. Importantly, the rest of the facts of the Glazier case regarding disclosure of the
14 claim against Premium in the debtor’s disclosure statement are directly on point. First, the claim
15 against Premium was known to the debtor and not disclosed in the disclosure statement. Id. at
16 *1-2. Second, Premium was not a creditor of the debtor, as its claim against the debtor was
17 expunged. Id. at *1. Third, the debtor’s confirmation order in Glazier vested all assets in the
18 debtor post-confirmation. Id. at *3-4. Fourth, the Glazier court found disclosure of the claim
19 against Premium would not have materially affected the way creditors voted on the debtor’s plan
20 because any recoveries against Premium would have been paid to secured creditors, not
21 unsecured creditors. Id. at *4. Fifth, all unsecured creditors who voted on the debtor’s plan
22 accepted the plan. Id. Based on these facts, the Glazier court found:
23
24
25
26
27
28

“[T]he disclosure of the causes of action against Premium in the disclosure statement would not have been material, because it was unlikely to have affected the unsecured creditors’ vote on the plan.”

1 Id. at *5.

2 23. In this matter, all five facts outlined above apply in this matter. First, the claim
3 against Rogich was not disclosed in the disclosure statement. Second, Rogich is not a creditor of
4 the Plaintiffs. Third, the Plaintiffs' Chapter 11 Plan vests all assets in the Plaintiffs, including
5 causes of action. See Confirmation Order, Bankruptcy Case No. 10-14804-LED, Docket No.
6 507, Plan, Section E. Fourth, the disclosure of the Rogich Claim in the Disclosure Statement
7 would not have affected the vote of the Plaintiffs' creditors, as all voting creditors already
8 accepted the Plaintiffs' plan.³ Fifth, all creditors to vote on the Plaintiffs' plan voted in favor of
9 the Plan. See Exhibit D, attached hereto.

10 24. Despite the above facts, Rogich, while citing no evidence or authority, argues in
11 his Opposition that "[s]urely, if the creditors were aware of an alleged claim of more than \$2 1/2
12 million, it would have been a material consideration affecting the impairment of their claims."
13 See Opposition, p. 5, ll. 16-17. Based on the above facts, this statement could not be further
14 from the truth.

15
16
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19
20 **Reconsideration is Appropriate Because the Plaintiffs' Disclosure Statement**
21 **Order is a Final Order for Which this Court Must Give Full Faith and Credit**

22 25. Finally, this Court's prior Partial Summary Judgment Order must be reconsidered
23 by this Court for two reasons. First, prior to the Partial Summary Judgment Order, the
24 Bankruptcy Court entered an order approving the Plaintiffs' Disclosure Statement (the
25 "**Disclosure Statement Order**"), a copy of which is attached hereto as **Exhibit E**, and such
26 order operates as res judicata as to whether the Plaintiffs' Disclosure Statement contained
27
28

3 Even if all voting creditors did not vote in favor of the Plan, disclosure of the Rogich
Claim would not have made a difference, as the Plaintiffs proposed to pay creditors from the
recoveries to be collected from a judgment (the Paulson Judgment). Adding recoveries from a
claim (the Rogich Claim) is immaterial, as it is far quicker and easier to recover from a judgment
than a claim.

1 “adequate information” within the meaning of section 1125 of the Bankruptcy Code. In fact, the
2 Glazier court stated the following:

3
4 In any event, the Bankruptcy Court approved GGI’s disclosure statement by entering the
5 Disclosure Statement Order, and such order is res judicata as to whether GGI’s disclosure
6 statement contained “adequate information” within the meaning of section 1125 of the
7 Bankruptcy Code. Because Premium participated in GGI’s Chapter 11 case, and failed to
8 challenge the Disclosure Statement Order, Premium is precluded from collaterally
9 attacking the Disclosure Statement Order in this Court.

10 The Glazier Group v. Premium Supply Co., Inc., 2013 WL 1727155, *4 (N.Y. Sup. 2013).

11 26. Here, the adequacy of information contained in the Plaintiffs’ Disclosure
12 Statement was already determined by the Bankruptcy Court as “adequate” pursuant to section
13 1125 of the Bankruptcy Code. See Disclosure Statement Order, p. 2. Second, res judicata
14 applies to Rogich here because he knew about the Plaintiffs’ bankruptcy case and was mailed a
15 copy of the Disclosure Statement and a notice of the hearing on the Disclosure Statement. See
16 Certificate of Service in Bankruptcy Case, Case No. 10-14804-BAM, Docket No. 436, p. 9-11, a
17 copy of which is attached hereto as **Exhibit F**. In fact, Melissa Olivas, chief financial officer of
18 Rogich Communications, previously testified in this case as follows:

19 Q. Were you aware that Carlos filed Chapter 11 bankruptcy?

20 A. Yes.

21 Q. How did you find out about that?

22 A. They noticed us. I mean, we received a notice in the mail.

23
24 See Deposition Transcript of Melissa Olivas, pp. 116-17, ll. 23-3, a copy of which is attached
25 hereto as **Exhibit G**. In fact, Rogich did receive notice of the Plaintiffs’ bankruptcy filing, and is
26 listed on the mailing matrix of the bankruptcy case, a copy of which is attached hereto as **Exhibit**
27 **H**.
28

29 27. Accordingly, Rogich could have objected to the Disclosure Statement and chose
30 not to do so. Pursuant to the Nevada Supreme Court’s rulings in Five Star Capital Corporation v.

1 Ruby, 124 Nev. 1048, 1057, 194 P.3d 709, 715 (2008) and Weddell v. Sharp, 350 P.3d 80 (Nev.
2 2015), res judicata applies and this Court's prior Partial Summary Judgment Order should be
3 vacated.
4

5 28. Second, reconsideration of this Court's Partial Summary Judgment Order is
6 necessary under NRCP 60(b)(5), as the judgment is void. Specifically, this Court is required to
7 give full faith and credit to the Disclosure Statement Order, as the Bankruptcy Court is the
8 proper jurisdiction to hear and determine all issues relating to the adequacy of information
9 contained in the disclosure statement. 28 U.S.C. §§ 157, 1409; see also The Glazier Group v.
10 Premium Supply Co., Inc., 2013 WL 1727155, *4-5 (N.Y. Sup. 2013) (finding the New York
11 state court is required to give full faith and credit to the disclosure statement order of the
12 bankruptcy court when determining all issues relating to the adequacy of information contained
13 in the disclosure statement).
14
15
16

17 29. Accordingly, this Court did not give full faith and credit to the Disclosure
18 Statement Order as required by federal law, and this Court lacked jurisdiction to even make a
19 finding that the Disclosure Statement contained insufficient information in accordance with 11
20 U.S.C. § 1125. Because this Court did not give full faith and credit to the Disclosure Statement
21 Order and lacked jurisdiction to enter a judgment contrary to the Disclosure Statement Order,
22 this Court's prior Partial Summary Judgment Order is void.
23
24
25

26 ///

27 ///

28 ///

///

///

Conclusion

30. For the reasons stated above, this Court should grant the Plaintiffs' Motion and vacate the prior Partial Summary Judgment Order granted in favor of Rogich. The Plaintiffs also request that this Court set the Motion for oral argument.

SCHWARTZ FLANSBURG PLLC

By: /s/ Samuel A. Schwartz
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Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Regular
U.S. Mail to the following on March 22, 2016:

Eldorado Hills, LLC
c/o Andrew M. Leavitt, Esq.
Matthew D. Cox, Esq.
Law Office of Andrew M. Leavitt, Esq.
633 South Seventh Street
Las Vegas, NV 89101

Sig Rogich, as Trustee of the Rogich Family Irrevocable Trust
c/o Samuel S. Lionel, Esq.
Brenoch R. Wirthlin, Esq.
Fennemore Craig, P.C.
300 South Fourth Street, Ste. 1400
Las Vegas, NV 89101

/s/ Christy L. Cahall
Christy L. Cahall

Exhibit A

<u>Creditor Name</u>	<u>Address</u>	<u>Account No.</u>	<u>Scheduled Amount</u>	<u>POC Number</u>	<u>POC Amount</u>	<u>Allowed Amount</u>
<i>American Express</i>	<i>P. O. Box 0001, Los Angeles, CA 90096</i>	xxxxxxx3005	\$ 3,000.00			<i>Paid by Carlos</i>
Arie Fisher	16 Rashi Street, Ra'anana, Israel 43214		\$ 41,200.00			<i>Paid by Carlos</i>
Bailus Cook & Kelesis	400 S. Fourth Street, Suite 300	xxxx31157	\$ 4,800.14			<i>Paid by Carlos</i>
Bank of America	P. O. Box 26012 NCA, 105-02-77, Greensboro, NC 27410	xxxx5099	\$ 46,774.04	5	\$ 46,946.67	\$ 46,946.67
Gordon & Silver	3960 Howard Hughes Pkwy, 9th Floor, Las Vegas, NV 89169		\$ 57,000.00	8	\$ 47,009.61	<i>Paid by Carlos</i>
Kolesar & Leatham	3320 W. Sahara Avenue, Suite 380, Las Vegas, Nevada 89102		\$ 17,346.91	3	\$ 16,174.50	<i>Paid by Carlos</i>
LL Bradford & Co.	8880 W. Sunset Road, Third Floor, Las Vegas, Nevada 89148		\$ 6,000.00			<i>Paid by Carlos</i>
Nevada State Bank	P. O. Box 990, Las Vegas, NV 89125	xxxx9002	\$ 653,000.00	5, 17	\$ 654,107.94	<i>Paid by Carlos</i>
Ray Koroghli	3055 Via Sarafina Avenue, Henderson, Nevada 89052		\$ 154,900.00			<i>Paid by Carlos</i>
ACS/Netnet (Education)	501 Bleecker Street, Utica, NY 13501	xxxx3881	\$ 17,033.00			\$ 17,033.00
<i>American Express</i>	<i>P. O. Box 0001, Los Angeles, CA 90096</i>	xxxx4003	\$ 2,800.00			<i>Paid by Carlos</i>
Bank of America	P. O. Box 37279, Baltimore, MD 21297	xxxx2390	\$ 260.00			\$ 260.00
Biltmore Village HOA	c/o Cadicorp Management Group, 7700 N. Kendall Drive, PH II, Miami, FL 33156		\$ 2,400.00			<i>Paid by Carlos</i>
Chase	P. O. Box 15298, Wilmington, DE 19850	xxxx4735	\$ 1,743.31			\$ 1,743.31
Chase Bank USA, N.A.	P. O. Box 15145, Wilmington, DE 19850	xxxx0898	\$ 398.45	8	\$ 398.45	\$ 398.45
Chase Bank USA, N.A.	P. O. Box 15145, Wilmington, DE 19850	xxxx2884	\$ 3,149.03	7	\$ 3,149.03	\$ 3,149.03
Chase Bank USA, N.A.	P. O. Box 15145, Wilmington, DE 19850	xxxx3432	\$ 23,987.41	6	\$ 23,987.41	\$ 23,987.41
Chase Bank USA, N.A.	P. O. Box 15145, Wilmington, DE 19850	xxxx4253	\$ 8,485.55	9	\$ 8,485.55	\$ 8,485.55
Discover Financial	P. O. Box 3025, New Albany, OH 43054	xxxx1814	\$ 7,200.00	14	\$ 6,156.25	\$ 6,156.25
Fairway Pines HOA	858 Tanager Street, Suite M, Incline Village, NV 89451		\$ 700.00			<i>Paid by Carlos</i>
FIA Card Services/Bank of America	c/o Becket and Lee, LLP, P. O. Box 3001, Malvern, PA 19355	xxxx1270	\$ 9,352.05	2, 11	\$ 9,352.05	\$ 9,352.05
FIA Card Services/Bank of America	c/o Becket and Lee, LLP, P. O. Box 3001, Malvern, PA 19355	xxxx5842	\$ 73.67	1, 12	\$ 73.67	\$ 73.67
FIA Card Services/Bank of America	c/o Becket and Lee, LLP, P. O. Box 3001, Malvern, PA 19355	xxxx2396	\$ 34.37	3, 13	\$ 34.37	\$ 34.37
Foley & Oakes	850 East Bonneville Avenue, Las Vegas, Nevada 89101		\$ 1,500.00			<i>Paid by Carlos</i>
Gap Credit Card	P. O. Box 960017, Orlando, Florida 32896	xxxx3757	\$ 459.44			\$ 459.44
Citibank, N.A.	P. O. Box 6305, The Lakes, NV 88901	xxxx7033	\$ 421.00	2	\$ 441.47	\$ 441.47
Quantum Collections	3224 Civic Center Dr., North Las Vegas, Nevada 89030	xxxx5190	\$ 138.00			\$ 138.00
Randall Daugherty	10541 Broadhead Court, Las Vegas, Nevada 89135		\$ 6,800.00			<i>Paid by Carlos</i>
Sierra Vista Ranchos HOA	P. O. Box 13044, Las Vegas, Nevada 89112	MV7004	\$ 1,200.00			<i>Paid by Carlos</i>
TOTAL:			\$ 1,072,156.37		\$ 816,316.97	\$ 118,658.67

Exhibit B

Ch

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Attorneys for the Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; GO
GLOBAL, INC., a Nevada corporation, as
assignee of interests of THE ALEXANDER
CHRISTOPHER TRUST, a Trust established in
Nevada; NANYAH VEGAS, LLC, a Nevada
limited liability company,

Plaintiffs,

v.

SIG ROGICH aka SIGMUND ROGICH as
Trustee of The Rogich Family Irrevocable Trust;
ELDORADO HILLS, LLC, a Nevada limited
liability company; DOES I-X; and/or ROE
CORPORATIONS I-X, inclusive.

Defendants.

Case No. A-13-686303-C

Dept. XXVII

DECLARATION OF CARLOS A. HUERTA

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CARLOS HUERTA, being duly sworn, deposes and says:

1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I
have personal knowledge of the facts set forth herein. I am the principal of Go Global, Inc. ("Go

1 Global"), and Go Global, along with myself, are Plaintiffs in the above-captioned matter. I make
2 this declaration in support of the Plaintiffs Reply to Defendants' Opposition to Motion for
3 Reconsideration or Relief from Order Granting Motion for Partial Summary Judgment (the "Motion").

4 2. Attached to the Motion as Exhibit A is a true and correct copy of the spreadsheet (the
5 "Spreadsheet") used by the Plaintiffs to determine the scheduled and allowed claims in the Plaintiffs'
6 Chapter 11 bankruptcy cases.

7 3. I personally paid the claims of creditors indicated as "Paid by Carlos" on the
8 Spreadsheet.
9

10 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
11 correct.

12 Dated this 22nd day of March, 2016.

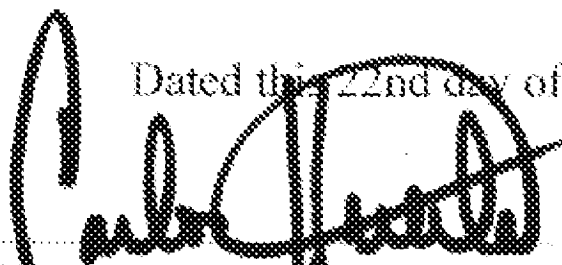
13 
14 CARLOS HUERTA
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit C

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
Schwartz Flansburg PLLC
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; GO
GLOBAL, INC., a Nevada corporation, as
assignee of interests of THE ALEXANDER
CHRISTOPHER TRUST, a Trust established in
Nevada; NANYAH VEGAS, LLC, a Nevada
limited liability company,

Plaintiffs,

v.

SIG ROGICH aka SIGMUND ROGICH as
Trustee of The Rogich Family Irrevocable Trust;
ELDORADO HILLS, LLC, a Nevada limited
liability company; DOES I-X; and/or ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. A-13-686303-C

Dept. XXVII

DECLARATION OF SAMUEL A. SCHWARTZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

SAMUEL A. SCHWARTZ, being duly sworn, deposes and says:

1 1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I
2 have personal knowledge of the facts set forth herein. I am an attorney and manager of Schwartz
3 Flansburg PLLC (“SF”), and am licensed to practice law in the State of Nevada. I am counsel to
4 Carlos Huerta and Go Global, Inc. in this matter, and served their bankruptcy counsel in their Chapter
5 11 cases. I make this declaration in support of the Plaintiffs’ Reply to Defendants’ Opposition to
6 Motion for Reconsideration or Relief from Order Granting Motion for Partial Summary Judgment (the
7 “Motion”).
8

9 2. Attached to the Motion as Exhibit A is a true and correct copy of the spreadsheet (the
10 “**Spreadsheet**”) prepared by SF to determine the scheduled and allowed claims in the Plaintiffs’
11 Chapter 11 bankruptcy cases. SF determined the scheduled and allowed claims by reviewing the
12 Plaintiffs’ bankruptcy schedules, reviewing all proofs of claim filed in the bankruptcy cases, and
13 reviewing all other relevant documents and pleadings related to claims in the bankruptcy cases.
14

15 3. As manager of SF, I caused SF to issue checks and cover letters to all claims listed on
16 the Spreadsheet, other than those indicated as “Paid by Carlos.” Attached hereto are true and correct
17 copies of the cover letters and checks issued to each creditor.

18 4. Only two checks were returned as “undeliverable,” one to Quantum Collections for
19 \$138.00, and one to Bank of America for \$260.00. Upon receiving the two checks as “undeliverable,”
20 SF obtained current addresses for these creditors and reissued the checks.
21

22 5. As of the date hereof, all checks have cleared SF’s bank account, with the exception of
23 one check to Bank of America in the amount of \$260.00. SF expects that check to clear shortly.
24
25
26
27
28

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22nd day of March, 2016.

/s/ Samuel A. Schwartz
SAMUEL A. SCHWARTZ, ESQ.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Quantum Collections
3224 Civic Center Dr.
N. Las Vegas, NV 89030

Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 5190

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$138.00, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001210

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Quantum Collections

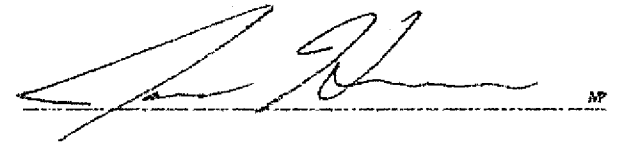
\$ **138.00

One Hundred Thirty-Eight and 00/100 ***** DOLLARS

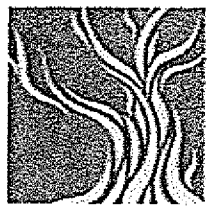
Quantum Collections
3224 Civic Center Drive
North Las Vegas, NV 89030

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THE WARNING BAND.



SCHWARTZ
FLANSBURG

Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Gap Credit Card
P.O. Box 960017
Orlando, FL 32896

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 3757**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$459.44, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001208

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Gap Credit Card

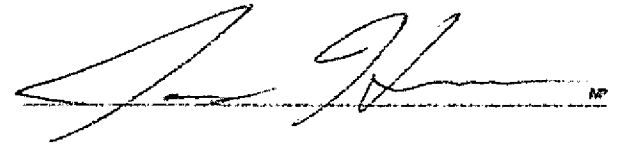
\$ **459.44

Four Hundred Fifty-Nine and 44/100***** DOLLARS

Gap Credit Card
PO Box 960017
Orlando, FL 32896

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.[†]
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

[†] Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
P.O. Box 3001
Malvern, PA 19355

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 5842**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$73.67, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,


Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001206

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

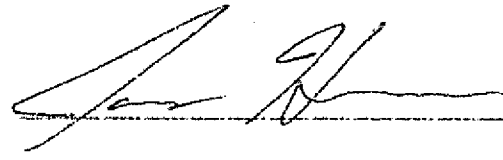
PAY TO THE ORDER OF FIA Card Services/Bank of America

\$ **73.67

Seventy-Three and 67/100***** DOLLARS

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
PO Box 3001
Malvern, PA 19355

VOID IF NOT CASHED IN 90 DAYS



MEMO

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
P.O. Box 3001
Malvern, PA 19355

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 2396**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$34.37, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001207

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

FIA Card Services/Bank of America

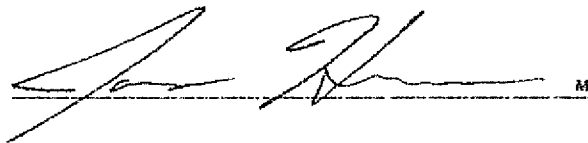
\$ **34.37

Thirty-Four and 37/100***** DOLLARS

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
PO Box 3001
Malvern, PA 19355

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THE SIGNATURE BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
P.O. Box 3001
Malvern, PA 19355

Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 1270

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$9,352.05, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001205

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

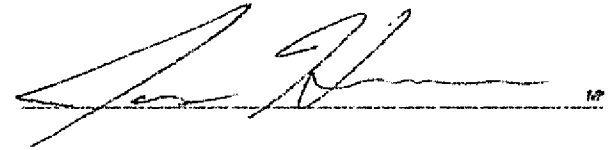
FIA Card Services/Bank of America

\$ **9,352.05

Nine Thousand Three Hundred Fifty-Two and 05/100***** DOLLARS

FIA Card Services/Bank of America
c/o Becket and Lee, LLP
PO Box 3001
Malvern, PA 19355

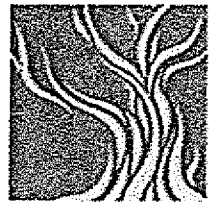
VOID IF NOT CASHED IN 90 DAYS



MEMO

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VOID BAND



SCHWARTZ
FLANSBURG

Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Discover Financial
P.O. Box 3025
New Albany, OH 43054

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 1814**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the **"Debtors"**) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the **"Bankruptcy Court"**) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors' Chapter 11 plan of reorganization (the **"Plan"**), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$6,156.25, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001204

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Discover Financial

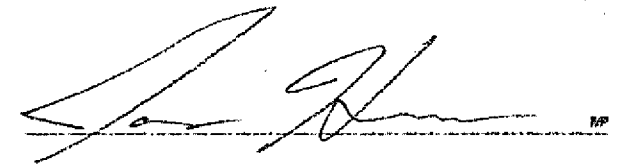
\$ **6,156.25

Six Thousand One Hundred Fifty-Six and 25/100***** DOLLARS

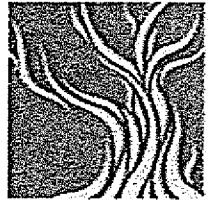
Discover Financial
PO Box 3025
New Albany, OH 43054

VOID IF NOT CASHED IN 90 DAYS

MEMO



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SCHWARTZ
FLANSBURG

Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Citibank, N.A.
P.O. Box 6305
The Lakes, NV 88901

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 7033**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the **"Debtors"**) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the **"Bankruptcy Court"**) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors' Chapter 11 plan of reorganization (the **"Plan"**), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$441.47, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001209

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Citibank, N.A.

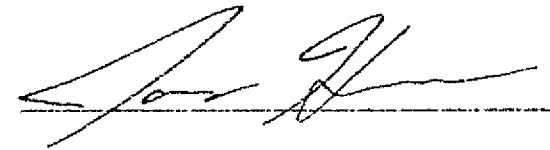
\$ **441.47

Four Hundred Forty-One and 47/100*****

DOLLARS

Citibank, N.A.
PO Box 6305
The Lakes, NV 88901

VOID IF NOT CASHED IN 90 DAYS



MEMO

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Chase
P.O. Box 15298
Wilmington, DE 19850

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 4735**

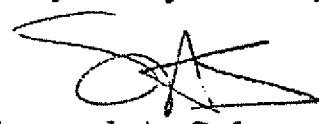
Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$1,743.31, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,



Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001199

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

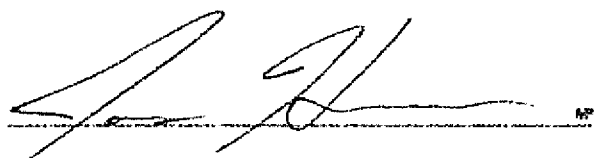
Chase

\$ **1,743.31

One Thousand Seven Hundred Forty-Three and 31/100***** DOLLARS

Chase
PO Box 15298
Wilmington, DE 19850

VOID IF NOT CASHED IN 90 DAYS



MEMO

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Chase
P.O. Box 15298
Wilmington, DE 19850

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 4253**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “**Debtors**”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “**Bankruptcy Court**”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “**Plan**”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$8,485.55, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001203

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Chase Bank USA, N.A.

\$ **8,485.55

Eight Thousand Four Hundred Eighty-Five and 55/100***** DOLLARS

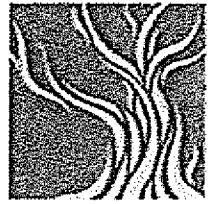
Chase Bank USA, N.A.
PO Box 15145
Wilmington, DE 19850

VOID IF NOT CASHED IN 90 DAYS

MEMO

 M^o

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SCHWARTZ
FLANSBURG

Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Chase
P.O. Box 15298
Wilmington, DE 19850

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 3432**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “**Debtors**”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “**Bankruptcy Court**”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “**Plan**”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$23,987.41, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001202

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Chase Bank USA, N.A.

\$ **23,987.41

Twenty-Three Thousand Nine Hundred Eighty-Seven and 41/100***** DOLLARS

Chase Bank USA, N.A.
PO Box 15145
Wilmington, DE 19850

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Chase
P.O. Box 15298
Wilmington, DE 19850

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 2884**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$3,149.03, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,


Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001201

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

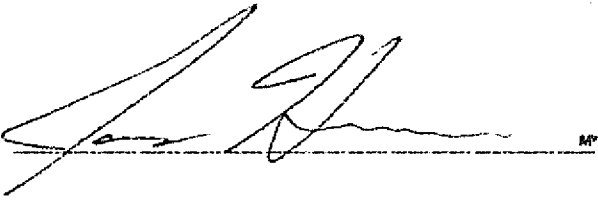
PAY TO THE ORDER OF Chase Bank USA, N.A.

\$ **3,149.03

Three Thousand One Hundred Forty-Nine and 03/100***** DOLLARS

Chase Bank USA, N.A.
PO Box 15145
Wilmington, DE 19850

VOID IF NOT CASHED IN 90 DAYS



MEMO

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Chase
P.O. Box 15298
Wilmington, DE 19850

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 0898**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “**Debtors**”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “**Bankruptcy Court**”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “**Plan**”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$398.45, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001200

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

Chase Bank USA, N.A.

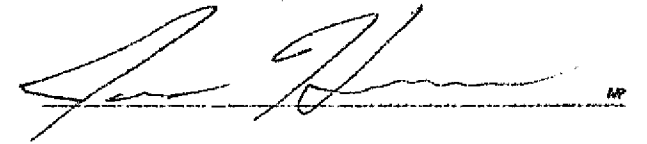
\$ **398.45

Three Hundred Ninety-Eight and 45/100***** DOLLARS

Chase Bank USA, N.A.
PO Box 15145
Wilmington, DE 19850

VOID IF NOT CASHED IN 90 DAYS

MEMO

 MP

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Bank of America
P.O. Box 26012 NC4-105-02-77
Greensboro, NC 27410

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 5099**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the **"Debtors"**) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the **"Bankruptcy Court"**) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors' Chapter 11 plan of reorganization (the **"Plan"**), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$46,946.67, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001195

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

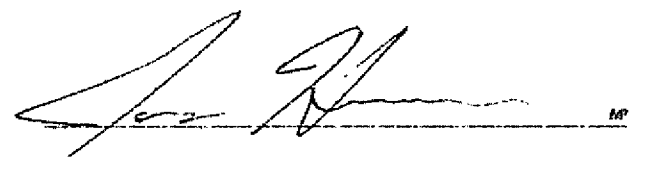
PAY TO THE ORDER OF Bank of America

\$ **46,946.67

Forty-Six Thousand Nine Hundred Forty-Six and 67/100 ***** DOLLARS

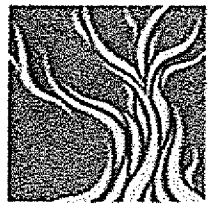
Bank of America
PO Box 26012
NC4-105-02-77
Greenboro, NC 27410

VOID IF NOT CASHED IN 90 DAYS



MEMO

THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THE WARNING BAND.



SCHWARTZ
FLANSBURG

Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

Bank of America
P.O. Box 37279
Baltimore, MD 21297

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 2390**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$260.00, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001198

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF Bank of America

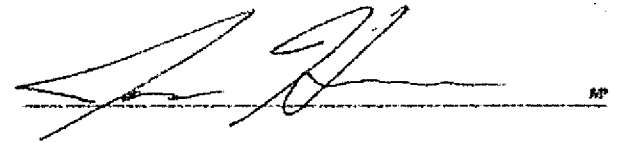
\$ **260.00

Two Hundred Sixty and 00/100***** DOLLARS

Bank of America
PO Box 37279
Baltimore, MD 21297

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORED BACKGROUND ON WHITE PAPER. MICROPRINT IS LOCATED BELOW THIS WARNING BAND.



Samuel A. Schwartz, Esq.*
Frank M. Flansburg III, Esq.†
Bryan A. Lindsey, Esq.
Brian Blankenship, Esq.
Troy Domina, Esq.

*Also licensed in Arizona, Florida and Illinois.

† Also licensed in Washington.

VIA U.S. MAIL

February 9, 2016

ACS /Nelnet (Education)
501 Bleecker Street
Utica, NY 13501

**Re: In re Go Global, Inc., Bankruptcy Case No. 10-14804;
In re Carlos & Christine Huerta, Bankruptcy Case No. 10-14456;
Account Ending in 3881**

Dear Creditor:

We represent In re Go Global, Inc., and Carlos & Christine Huerta (collectively, the “Debtors”) in connection with their confirmed Chapter 11 bankruptcy cases pending before the United States Bankruptcy Court (the “Bankruptcy Court”) for the District of Nevada, Case Nos. 10-14804 and 10-14456.

Please be advised that on July 22, 2013, the Bankruptcy Court entered an order approving the Debtors’ Chapter 11 plan of reorganization (the “Plan”), which Plan became effective on October 6, 2014. Please also be advised that on April 8, 2014, the Bankruptcy Court entered an order granting the Debtors their discharge in the Chapter 11 case.

Pursuant to the terms of the Plan, enclosed please find a check in the amount of \$17,033.00, which is the full amount of your allowed claim under the Plan. Should you have any questions regarding the contents of this letter, please do feel free to contact the undersigned.

Very Truly Yours,

Samuel A. Schwartz, Esq.

Enclosure:

cc: Carlos A. Huerta (via electronic mail)

001197

SCHWARTZ FLANSBURG PLLC
IOLTA ACCOUNT
6623 Las Vegas Blvd S Unit 300
Las Vegas, NV 89119-3246

Bank of America
300 S 4th St
Las Vegas, NV 89101
94-72/1224

2/9/2016

PAY TO THE
ORDER OF

ACS/Nelnet

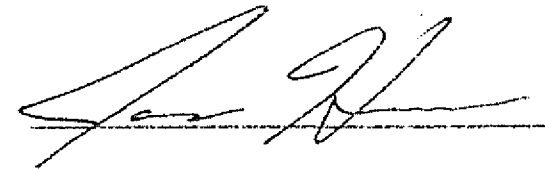
\$ **17,033.00

Seventeen Thousand Thirty-Three and 00/100 ***** DOLLARS

ACS/Nelnet
501 Bleecker Street
Utica, NY 13501

VOID IF NOT CASHED IN 90 DAYS

MEMO



THIS DOCUMENT CONTAINS A COLORFUL BACKGROUND

CROP PRINT IS LOCATED BELOW THIS LINE AND

Exhibit D

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Joint Administration Under
Go Global, Inc.,)	CASE NO.: 10-14804-BAM
Debtor,)	
In re:)	CASE NO.: 10-14804-BAM
Carlos A. Huerta, and)	CASE NO.: 10-14456-BAM
Christine H. Huerta,)	CASE NO.: 11-27226-BAM
Debtors.)	CASE NO.: 11-28681-BAM
In re:)	
Charleston Falls, LLC,)	
Debtor.)	Chapter 11
In re:)	
HPCH, LLC,)	Confirmation Hearing Dates and Times:
Debtor.)	June 19, 2013, at 9:00 a.m.
)	June 20, 2013, at 9:30 a.m.

**SUPPLEMENTAL DECLARATION OF SAMUEL A. SCHWARTZ
CERTIFYING VOTING ON AND TABULATION OF BALLOTS ACCEPTING
AND REJECTING THE DEBTORS' JOINT PLAN OF REORGANIZATION**

SAMUEL A. SCHWARTZ, ESQ., being duly sworn, deposes and says:

1. I am the principal of The Schwartz Law Firm, Inc. ("SLF" or the "Firm"), 6623 Las Vegas Blvd. South, Suite 300, Las Vegas, Nevada 89119. I am authorized to make this declaration on SLF's behalf and unless otherwise indicated, I have personal knowledge of the facts set forth herein.

2. On June 11, 2013, I filed that certain declaration certifying voting on and tabulation of ballots accepting and rejecting the Debtors' plan of reorganization (Docket No.

1 499). I now file this supplemental declaration to inform this Court that in Class 2(d), The Lionel
2 Foundation accepted the Debtors' Plan, and in Class 4, Hugo R. Paulson and the Paulson Entities
3 accepted the Debtors' Plan. Accordingly, as of the date and time of this Declaration, SLF
4 received 7 acceptances of the Plan and no rejections of the Plan.
5

6 3. In Class 2(a), Nevada State Bank **ACCEPTED** the Plan.
7

8 4. In Class 2(c), Wells Fargo Bank, N.A. **ACCEPTED** the Plan.
9

10 5. In Class 2(d), The Lionel Foundation **ACCEPTED** the Plan.
11

12 6. In Class 2(e), Aurora Loan Servicing, LLC **ACCEPTED** the Plan.
13

14 7. In Class 4, Hugo R. Paulson and the Paulson Entities **ACCEPTED** the Plan.
15

16 8. In Class 5, Nevada State Bank **ACCEPTED** the Plan.
17

18 9. In Class 6, Discover Bank and Ray Koroghli **ACCEPTED** the Plan.
19

20 10. No other votes were received.
21

22 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
23 and correct.
24

25 Dated this 18th day of June, 2013.
26

27 /s/ Samuel A. Schwartz
28 SAMUEL A. SCHWARTZ, ESQ.
29 Nevada Bar No. 10985
30 The Schwartz Law Firm, Inc.
31 6623 Las Vegas Blvd. South, Suite 300
32 Las Vegas, Nevada 89119
33 Telephone: (702) 385-5544
34 Facsimile: (702) 385-2741
Attorneys for the Debtors

Exhibit E

Bruce A. Markell

Honorable Bruce A. Markell
United States Bankruptcy Judge



Entered on Docket
April 08, 2013

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Joint Administration Under
Go Global, Inc.,)	CASE NO.: 10-14804-BAM
)	
Debtor.)	CASE NO.: 10-14804-BAM
In re:)	CASE NO.: 10-14456-BAM
Carlos A. Huerta, and)	CASE NO.: 11-27226-BAM
Christine H. Huerta,)	CASE NO.: 11-28681-BAM
)	
Debtors.)	
In re:)	Chapter 11
Charleston Falls, LLC,)	
)	
Debtor.)	
In re:)	
HPCH, LLC,)	Date of Hearing: March 26, 2013
Debtor.)	Time of Hearing: 10:00 a.m.
)	

ORDER (i) APPROVING THE DISCLOSURE STATEMENT; (ii) APPROVING THE FORM OF BALLOTS AND PROPOSED SOLICITATION AND TABULATION PROCEDURES; (iii) FIXING THE VOTING DEADLINE WITH RESPECT TO THE DEBTORS' CHAPTER 11 PLAN; (iv) PRESCRIBING THE FORM AND MANNER OF NOTICE THEREOF; (v) FIXING THE LAST DATE FOR FILING OBJECTIONS TO CHAPTER 11 PLAN; (vi) SCHEDULING A HEARING TO CONSIDER CONFIRMATION OF THE CHAPTER 11 PLAN; AND (vii) APPOINTING THE SCHWARTZ LAW FIRM AS SOLICITATION AND TABULATION AGENT

1 Upon the application dated January 22, 2013 (the “**Scheduling Motion**”),¹ with the
2
3 First Amended Disclosure Statement dated January 17, 2013, and the First Amended Plan of
4 Reorganization dated January 17, 2013, of the above-captioned debtors and debtors-in-
5 possession (the “**Debtors**”), for an order, (i) approving the disclosure statement; (ii) approving
6 the form of ballots and proposed solicitation and tabulation procedures for the Plan; (iii) fixing
7 the voting deadline with respect to the Plan, (iv) prescribing the form and manner of notice
8 thereof; (v) fixing the last day for filing objections to the Plan; (vi) scheduling a hearing to
9 consider the confirmation of the Plan, and (vii) approving The Schwartz Law Firm, Inc. as the
10 Debtors’ solicitation and tabulation agent (the “**Solicitation and Tabulation Agent**”); and it
11 appearing that the Court has jurisdiction over this matter; and Hugo Paulson, individually and
12 as Trustee of the Hugo Paulson SEP-IRA (“**Paulson**”) having filed an objection to the
13 Disclosure Statement; and the Debtors having filed their Second Amended Disclosure
14 Statement and Second Amended Plan of Reorganization on March 8, 2013 to address the issues
15 raised by Paulson; and the Debtors having filing their Third Amended Disclosure Statement
16 (the “**Disclosure Statement**”) and Third Amended Plan of Reorganization (the “**Plan**”) on
17 March 28, 2013 to accommodate additional requests by Paulson; and it further appearing that
18 the relief requested in the Scheduling Motion is in the best interests of the Debtors, their
19 bankruptcy estates and their creditors; and upon all of the proceedings had before the Court;
20 and after due deliberation and sufficient cause appearing therefore, it is hereby:
21
22
23
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27

28 **ORDERED** that the Pursuant to section 1125 of the Bankruptcy Code and Rule
29 3017(b) of the Federal Rules of Bankruptcy Procedure, the Disclosure Statement, as amended,
30 is hereby approved, and it is further
31

32 ¹ All capitalized terms not otherwise defined herein have the meaning ascribed to such terms in the Scheduling Motion.

1 **ORDERED** that the Debtors shall commence solicitation of their Plan by April 8,
2 2013; and it is further

3 **ORDERED** that pursuant to Bankruptcy Rule 3017(c), May 13, 2013, shall be the last
4 date to vote to accept or reject the Plan (the “**Voting Deadline**”); and it is further

5 **ORDERED** that any replies to objections to the Plan, ballot voting summaries and any
6 confirmation hearing briefs shall be due on May 31, 2013; and it is further

7 **ORDERED** that lists of witnesses and exhibits to be used at the Confirmation Hearing
8 shall be filed by June 7, 2013; and it is further

9 **ORDERED** that a pre-trial conference shall be held on June 11, 2013 at 11:00 a.m.;
10 and it is further

11 **ORDERED** that pursuant to section 1128(a) of the Bankruptcy Code and Bankruptcy
12 Rule 3017(c), the Confirmation Hearing in these Chapter 11 cases shall be held on June 19,
13 2013, at 9:30 a.m. and June 20, 2013 at 9:30 a.m.; and it is further

14 **ORDERED** that pursuant to Bankruptcy Rules 3020(b) and 9006(c)(1), objections, if
15 any, to confirmation of the Plan shall be in writing and shall (a) state the name and address of
16 the objecting party and the nature and amount of the claim or interest of such party, (b) state
17 with particularity the basis and nature of each objection or proposed modification to the Plan
18 and (c) be filed, together with proofs of service, with the Court (with a copy delivered to
19 chambers) and served so that such objections are actually received by the parties listed below,
20 no later than May 13, 2013 (the “**Confirmation Objection Deadline**”):

21 Samuel A. Schwartz, Esq.
22 The Schwartz Law Firm
23 6623 Las Vegas Blvd. South, Suite 300
24 Las Vegas, Nevada 89119
25 Facsimile: (702) 385-2741
26
27
28
29
30
31
32

1 and it is further

2 **ORDERED** that that any party failing to file and serve an objection to the Plan in
3 compliance with this Order shall be barred from raising any objections at the Confirmation
4 Hearing; and it is further

5
6 **ORDERED** that the Confirmation Hearing may be adjourned from time to time
7 without prior notice to holders of claims, holders of equity interests, or other parties in interest
8 other than the announcement of the adjourned hearing date at the Confirmation Hearing; and it
9 is further
10

11
12 **ORDERED** that pursuant to Bankruptcy Rules 3018(c) and 3017(a), the form of
13 ballots, attached to the Scheduling Motion as Exhibit B are approved; and it is further

14
15 **ORDERED** that pursuant to Bankruptcy Rules 3017(c) and 3018(a), the holders of
16 claims in Classes 1, 2, 3, 4, 5, 6 and 7 of the Plan as of the Record Date (as defined in the Plan)
17 may vote to accept or reject the Plan by indicating their acceptance or rejection of the Plan on
18 the ballots provided therefore; and it is further

19
20 **ORDERED** that the provision of notice in accordance with the procedures set forth in
21 this Order and the Voting Procedures shall be deemed good and sufficient notice of the
22 Confirmation Hearing, the Voting Deadline and the Confirmation Objection Deadline; and it is
23 further
24

25
26 **ORDERED** that, pursuant to Bankruptcy Rule 3017(c), but except as otherwise
27 expressly provided in the Voting Procedures, in order to be considered as acceptances or
28 rejections of the Plan, all ballots must be properly completed, executed, marked and actually
29 received by the Solicitation and Tabulation Agent on or before the Voting Deadline; and it is
30 further
31
32

1 **ORDERED** that the Solicitation and Tabulation Agent is authorized and directed to
2 effect any action reasonably necessary to accomplish the solicitation and tabulation services
3 contemplated by the Disclosure Statement and the Voting Procedures; and it is further
4

5 **ORDERED** that the Debtors are not required to mail a Solicitation Package, an
6 Unimpaired Class Notice or a Shareholder Notice (as the case may be) to any individual or
7 entity at an address from which notice of the Disclosure Statement Hearing was returned by the
8 United States Postal Office as undeliverable, unless the Debtors or the Solicitation and
9 Tabulation Agent are provided with a more accurate address prior to the Record Date. The
10 Solicitation and Tabulation Agent shall report any undeliverable solicitation packages in its
11 ballot declaration; and it is further
12
13

14 **ORDERED** that any entity entitled to vote to accept or reject the Plan may change its
15 vote before the Voting Deadline by casting a superseding ballot so that such superseding ballot
16 is actually received by the Solicitation and Tabulation Agent on or before the Voting Deadline;
17 and it is further
18
19

20 **ORDERED** that creditors who timely file an objection prior to the Confirmation
21 Objection Deadline, but fail to cast a ballot prior to the Voting Deadline, may cast a ballot
22 through the time of the Confirmation Hearing in connection with the resolution of their
23 objection; and it is further
24
25

26 **ORDERED** that the Debtors are authorized and empowered to take such other actions
27 and execute such other documents as may be necessary or appropriate to implement the terms
28 of this Order; and it is further
29

30 ///

31 ///

1 **ORDERED** that this Court shall, and hereby does, retain jurisdiction with respect to all
2 matters arising from or in relation to the implementation of this Order.
3

4
5 SUBMITTED BY:

6 THE SCHWARTZ LAW FIRM, INC.
7

8 By: /s/ Samuel A. Schwartz
9 Samuel A. Schwartz, Esq., NBN 10985
10 6623 Las Vegas Blvd. South, Suite 300
11 Las Vegas, Nevada 89119
12 Attorneys for Debtors
13
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SUBMISSION TO COUNSEL FOR APPROVAL PURSUANT TO LR 9021

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

_____ The court has waived the requirement set forth in LR 9021(b)(1).

_____ No party appeared at the hearing or filed an objection to the motion.

 X I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

_____ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of this order.

APPROVED: Bradley J. Stevens, Esq.

DISAPPROVED:

FAILED TO RESPOND:

Submitted by:

THE SCHWARTZ LAW FIRM, INC.

By: /s/ Samuel A. Schwartz
Samuel A. Schwartz, Esq., NBN 10985
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Attorneys for Debtors

###

Exhibit F

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

E-Filed: January 22, 2013

THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	CASE NO.: 10-14804-BAM
)	
Go Global, Inc.,)	Chapter 11
)	
Carlos A. Huerta and Christine H. Huerta,)	Joint Administration With:
)	10-14456-BAM
Charleston Falls, LLC,)	11-27226-BAM
)	11-28681-BAM
HPCH, LLC,)	
)	Hearing date: March 5, 2013
Debtors.)	Hearing time: 10:00 a.m.
)	
)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the following:

1. Disclosure Statement with all exhibits attached, including the Debtor's Plan of Reorganization; and
2. Notice of Hearing for Approval of the Disclosure Statement

were sent via Electronic Mail on January 17, 2013, to the following:

MICHAEL W. CHEN on behalf of Creditor CHASE HOME FINANCE, LLC F/K/A CHASE MANHATTAN MORTGAGE CORPORATION F/K/A CHASE MORTGAGE COMPANY
yvette@ccfirm.com;mrosales@ccfirm.com;rdesimone@ccfirm.com;jcraig@ccfirm.com;jessica@ccfirm.com

RANDOLPH L. HOWARD on behalf of Special Counsel KOLESAR & LEATHAM, CHTD.
rhoward@klnevada.com, ckishi@klnevada.com;bankruptcy@klnevada.com

1 CHRISTOPHER M. HUNTER on behalf of Creditor AURORA BANK, FSB, ITS
2 ASSIGNEES AND/OR SUCCESSORS

3 bknotice@mccarthyholthus.com,
4 chunter@mccarthyholthus.com;nvbkcourt@mccarthyholthus.com

5 P STERLING KERR on behalf of Debtor HPCH, LLC

6 psklaw@aol.com, ecfnocesbk@gmail.com

7 JAMES A KOHL on behalf of Interested Party CANTANGO CAPITAL ADVISORS

8 jak@h2law.com, sgeorge@howardandhoward.com

9 BRANDON B. MCDONALD on behalf of Debtor HPCH, LLC

10 brandon@mlglawyer.com, veronica@mlglawyer.com

11 SHAWN W MILLER on behalf of Creditor WELLS FARGO BANK, N.A.

12 smiller@millerwrightlaw.com,
13 cmiller@millerwrightlaw.com,randerson@millerwrightlaw.com,efile@millerwrightlaw.com

14 SUSAN L. MYERS on behalf of Creditor HUGO PAULSON

15 smyers@lacs.org, emontes@lacs.org;bklsclv@lionelsawyer.com

16 AMBRISH S. SIDHU on behalf of Counter-Claimant DANIEL DEARMAS

17 ecfnoces@sidhulawfirm.com

18 MARK G SIMONS on behalf of Counter-Defendant GO GLOBAL, INC.

19 msimons@rbslatts.com, jalhasan@rbslatts.com

20 JENNIFER A. SMITH on behalf of Counter-Claimant AZURE SEAS HOLDINGS, LLC

21 cobrien@lionelsawyer.com, bklsr@lionelsawyer.com

22 NATHAN F. SMITH on behalf of Creditor Nationstar Mortgage LLC.

23 nathan@mclaw.org, amy@mclaw.org

24 JEFFREY R. SYLVESTER on behalf of Creditor NEVADA STATE BANK

25 jeff@sylvesterpolednak.com, tina@sylvesterpolednak.com;bridget@sylvesterpolednak.com

26 U.S. TRUSTEE - LV - 11

27 USTPRegion17.lv.ecf@usdoj.gov

28 UNITED ONE EQUITIES, LLC (all)

Loanresolutions@aol.com

GREGORY L. WILDE on behalf of Creditor WELLS FARGO BANK, N.A.

nvbk@tblaw.com,
jrgiordano@tblaw.com;mlbenson@tblaw.com;jlferran@tblaw.com;grgarrett@tblaw.com;pjkut
neski@tblaw.com;maerwin@tblaw.com;tmrovere@tblaw.com

I HEREBY CERTIFY that true and correct copies of the following:

1. Motion of the Debtor for the Entry of an Order: (i) Approving the Disclosure Statement; (ii) Approving the Form of Ballots and Proposed Solicitation and Tabulation Procedures; (iii) Fixing the Voting Deadline with Respect to the Debtor's Chapter 11 Plan; (iv) Prescribing the Form and Manner of Notice Thereof; (v) Fixing the Last Date for Filing Objections to the Chapter 11 Plan; (vi) Scheduling a Hearing to Consider Confirmation of the Chapter 11 Plan; and (vii) Appointing the Schwartz Law Firm, Inc. as Solicitation and Tabulation Agent; and
2. Notice of Hearing for Motion of the Debtor for the Entry of an Order: (i) Approving the Disclosure Statement; (ii) Approving the Form of Ballots and Proposed Solicitation and Tabulation Procedures; (iii) Fixing the Voting Deadline with Respect to the Debtor's Chapter 11 Plan; (iv) Prescribing the Form and Manner of Notice Thereof; (v) Fixing the Last Date for Filing Objections to the Chapter 11 Plan; (vi) Scheduling a Hearing to Consider Confirmation of the Chapter 11 Plan; and (vii) Appointing the Schwartz Law Firm, Inc. as Solicitation and Tabulation Agent

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yvette@ccfirm.com;mrosales@ccfirm.com;rdesimone@ccfirm.com;jcraig@ccfirm.com;jessica@ccfirm.com

RANDOLPH L. HOWARD on behalf of Special Counsel KOLESAR & LEATHAM, CHTD.
rhoward@klnevada.com, ckishi@klnevada.com;bankruptcy@klnevada.com

CHRISTOPHER M. HUNTER on behalf of Creditor AURORA BANK, FSB, ITS ASSIGNEES AND/OR SUCCESSORS
bknotice@mccarthyholthus.com,
chunter@mccarthyholthus.com;nvbkcourt@mccarthyholthus.com

P STERLING KERR on behalf of Debtor HPCH, LLC
psklaw@aol.com, ecfnocesbk@gmail.com

JAMES A KOHL on behalf of Interested Party CANTANGO CAPITAL ADVISORS
jak@h2law.com, sgeorge@howardandhoward.com

BRANDON B. MCDONALD on behalf of Debtor HPCH, LLC
brandon@mlglawyer.com, veronica@mlglawyer.com

SHAWN W MILLER on behalf of Creditor WELLS FARGO BANK, N.A.
smiller@millerwrightlaw.com,
cmiller@millerwrightlaw.com,randerson@millerwrightlaw.com,efile@millerwrightlaw.com

SUSAN L. MYERS on behalf of Creditor HUGO PAULSON
smyers@lacs.org, emontes@lacs.org;bklsclv@lionelsawyer.com

AMBRISH S. SIDHU on behalf of Counter-Claimant DANIEL DEARMAS
ecfnotices@sidhulawfirm.com

MARK G SIMONS on behalf of Counter-Defendant GO GLOBAL, INC.
msimons@rbslattys.com, jalhasan@rbslattys.com

JENNIFER A. SMITH on behalf of Counter-Claimant AZURE SEAS HOLDINGS, LLC
cobrien@lionelsawyer.com, bklsclv@lionelsawyer.com

NATHAN F. SMITH on behalf of Creditor Nationstar Mortgage LLC.
nathan@mclaw.org, amy@mclaw.org

JEFFREY R. SYLVESTER on behalf of Creditor NEVADA STATE BANK
jeff@sylvesterpolednak.com, tina@sylvesterpolednak.com;bridget@sylvesterpolednak.com

U.S. TRUSTEE - LV - 11
USTPRegion17.lv.ecf@usdoj.gov

UNITED ONE EQUITIES, LLC (all)
Loanresolutions@aol.com

GREGORY L. WILDE on behalf of Creditor WELLS FARGO BANK, N.A.
nvbk@tblaw.com,
jrgiordano@tblaw.com;mlbenson@tblaw.com;jlferran@tblaw.com;grgarrett@tblaw.com;pjkut
neski@tblaw.com;maerwin@tblaw.com;tmrovere@tblaw.com

I HEREBY CERTIFY that true and correct copies of the following:

1. Disclosure Statement with all exhibits attached, including the Debtor's Plan of Reorganization; and
2. Notice of Hearing for Approval of the Disclosure Statement

were sent via Regular US Postal Mail on January 22, 2013, to the following:

Securities and Exchange Commission
Los Angeles Regional Office
Rosalind Tyson, Regional Director
5670 Wilshire Boulevard, 11th Floor
Los Angeles, CA 90036-3648

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

United States Trustee
300 Las Vegas Blvd. South #4300
Las Vegas, NV 89101

Clark County Treasurer
Reference #138-19-818-006
500 S. Grand Central Pkwy
P.O. Box 551220
Las Vegas, NV 89155-1220

Nevada Department of Taxation
Bankruptcy Section
555 E. Washington Avenue, #1300
Las Vegas, NV 89101-1046

Antonio Nevada, LLC
8880 W. Sunset Road
3rd Floor
Las Vegas, NV 89148

Dept. of Employment, Training & Rehab
Employment Security Division
500 East Third Street
Carson City, NV 89713-0002

Arie Fisher
16 Rashi Street
Ra'anana, Israel 43214

State of Nevada Dept. of Motor Vehicles
Attn: Legal Division
555 Wright Way
Carson City, NV 89711-0001

Aurora Loan Services
Attn: Bankruptcy Dept.
Po Box 1706
Scottsbluff, NE 69363

Clark County Assessor
c/o Bankruptcy Clerk
500 S Grand Central Pkwy
Box 551401
Las Vegas, NV 89155-1401

Aurora Loan Services, LLC
c/o McCarthy & Holthus, LLP
9510 West Sahara Ave. Ste. 110
Las Vegas, NV 89117

ACND 1431, LLC
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

Azure Seas, LLC
5024 E. Lafayette Blvd
Phoenix, AZ 85018

Acs/nelnet Education
501 Bleecker St
Utica, NY 13501

Bac Home Loans Servicing
450 American St
Simi Valley, CA 93065

Aes/chase Elt Wac Llc
Pob 2461
Harrisburg, PA 17101

Bailus Cook & Kelesis
400 S. Fourth Street, Suite 300
Las Vegas, NV 89101

American Express
PO Box 0001
Los Angeles, CA 90096-0001

Bank Of America
Po Box 26078
Greensboro, NC 27420

American Express
c/o Becket and Lee LLP
Po Box 3001
Malvern, PA 19355

Bank Of America
Attention: Bankruptcy SV-314B
Po Box 5170
Simi Valley, CA 93062

Amex
c/o Beckett & Lee
Po Box 3001
Malvern, PA 19355

Bank of America
P.O. Box 37279
Baltimore, MD 21297

Bank Of America
4161 Piedmont Pkwy
Greensboro, NC 27410

Bank Of America
Po Box 15026
Wilmington, DE 19850

Biltmore Village HOA
c/o Cadicorp Management Group
7700 N. Kendall Drive
PH II
Miami, FL 33156

Bmw Financial Services
5550 Britton Parkway
Hilliard, OH 43026

Bsi Financial Services
314 S Franklin Street
Titusville, PA 16354
Cap One Na
Po Box 85520
Richmond, VA 23285

Capital One, N.a.
C/O American Infosource
Po Box 54529
Oklahoma City, OK 73154

Chase
Po Box 15298
Wilmington, DE 19850

Chase
N54 W 13600 Woodale Dr
Menomonee, WI 53051

Chase Bank USA, N.A.
Po Box 15145
Wilmington, DE 19850-5145

Chase Bank Usa, Na
Po Box 9007
Pleasanton, CA 94566

Chase Home Finance, LLC
PP-G7 Bankruptcy Payment Processing
Attn: Officer or Director
3415 Vision Drive
Columbus, OH 43218-2106

Chase Mht Bk
Attn: Bankruptcy
Po Box 15145
Wilmington, DE 19850

Chrysler Financial
11811 N Tatum Blvd Ste 4
Phoenix, AZ 85028

Citi
Po Box 6241
Sioux Falls, SD 57117

Citibank Usa
Attn.: Centralized Bankruptcy
Po Box 20363
Kansas City, MO 64195

Citifinancial Retail Services
Citifinancial/Attn: Bankruptcy Dept
1111 Northpoint Dr
Coppell, TX 75019

Citimortgage Inc
Po Box 9438
Gaithersburg, MD 20898

City National Bank
P.O. Box 60938
Los Angeles, CA 90060-0938

City of Cedar Park
600 N. Bell Blvd.
Cedar Park, TX 78613

Crovetti Bone and Joint Institute of SN
2779 W. Horizon Ridge Pkwy Suite 200
Henderson, NV 89052-4380

Discover Financial
Attention: Bankruptcy Department
Po Box 3025
New Albany, OH 43054

GEMB / HH Gregg
Attention: Bankruptcy
Po Box 103106
Roswell, GA 30076

Dsnb Bloom
Bloomington's Bankruptcy
Po Box 8053
Mason, OH 45040

GEMB / Mervyns
Attention: Bankruptcy
Po Box 103104
Roswell, GA 30076

Extra Space Storage
3008 E. Sunset Road
Las Vegas, NV 89120

GEMB / Old Navy
Attention: Bankruptcy
Po Box 103104
Roswell, GA 30076

Fairway Pines HOA
848 Tanager Street
Ste M
Incline Village, NV 89451

Gemb/banana Rep
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076

FIA Card Services aka Bank of America
c/o Becket and Lee, LLP
Attorneys/Agent for Creditor
P.O. Box 3001
Malvern, PA 19355-0701

Gemb/gap
Po Box 981400
El Paso, TX 79998

Foley & Oakes
850 East Bonneville Avenue
Las Vegas, NV 89101

Gemb/gapdc
Po Box 981400
El Paso, TX 79998

Fst Usa Bk B
1001 Jefferson Plaza
Wilmington, DE 19701

Gordon & Silver
3960 Howard Hughes Pkwy
9th Floor
Las Vegas, NV 89169

G M A C
Po Box 12699
Glendale, AZ 85318

Home Comings Financial
Attention: Bankruptcy Dept
1100 Virginia Drive
Fort Washington, PA 19034

G M A C
Po Box 130424
Roseville, MN 55113

Home Depot Credit Services
PO Box 6925
The Lakes, NV 88901

GAP Credit Card
P.O. Box 960017
Orlando, FL 32896

HPCH, LLC
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

Hsbc/rs
Pob 15521
Wilmington, DE 19805

Nevada State Bank
P.O. Box 990
Las Vegas, NV 89125

Hugo Paulson
c/o Jennifer A. Smith
Lionel Sawyer & Collins
50 W. Liberty Street, #1100
Reno, NV 89501

One Cap Financial
5440 W. Sahara Avenue
3rd Floor
Las Vegas, NV 89145

Hugo R. Paulson
5024 E. Lafayette Blvd.
Phoenix, AZ 85018

Pacific Monarch Resort
23091 Mill Creek Dr
Laguna Hills, CA 92653

Jjill/cbsd
Po Box 6497
Sioux Falls, SD 57117

Park City HOA
23807 Aliso Creek Road
Laguna Niguel, CA 92677

Kolesar & Leatham
3320 W. Sahara Avenue, Ste. 380
Las Vegas, NV 89102

Park City Homeowner's Association
P.O. Box 171439
Salt Lake City, UT 84117-1439

LL Bradford & Co.
8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

Phillip M. Stone
6900 McCarran Blvd.
Ste. 2040
Reno, NV 89509

Macys/fdsb
Macy's Bankruptcy
Po Box 8053
Mason, OH 45040

Quantum Collections
3224 Civic Center Dr
North Las Vegas, NV 89030

Mohawk/gemb
Po Box 981439
El Paso, TX 79998

Randall Daugherty
10541 Broadhead Court
Las Vegas, NV 89135

Monarch Grand Vacations
P.O. Box 15708
Sacramento, CA 95852-5708

Ray Koroghli
3055 Via Sarafina Avenue
Henderson, NV 89052

Nelnet
Attn: Claims
Po Box 17460
Denver, CO 80217

Realized Gains, LLC
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

Shell Oil / Citibank
Attn.: Centralized Bankruptcy
Po Box 20507
Kansas City, MO 64195

Sierra Vista Ranchos HOA
P.O. box 13044
Las Vegas, NV 89112

Wachov Mtg/ Wells Fargo
Attn: Bankruptcy
Po Box 10335
Des Moines, IA 50306

Sigmund Rogich
3883 Howard Hughes Pkwy
Ste. 550
Las Vegas, NV 89169

Wells Fargo
P.O. Box 14547
Des Moines, IA 50306

Silver State Bank
400 N Green Valley Pkwy
Henderson, NV 89074

Wells Fargo Bank N A
Po Box 31557
Billings, MT 59107

Suntrust Mortgage/cc 5
Attention: Bankruptcy
Po Box 85092
Richmond, VA 23286

Wells Fargo Hm Mortgage
3476 Stateview Blvd
Fort Mill, SC 29715

Sweetwater Lift Lodge
1255 Empire Avenue
Park City, UT 84060

Wendover Fin Srvs Corp
1550 Liberty Ridge
Wayne, PA 19087

Unvl/citi
Attn.: Centralized Bankruptcy
Po Box 20507
Kansas City, MO 64195

Wells Fargo Bank, N.A.
c/o Smith, Gambrell & Russell, LLP
Attn: John T. Vian, Esq.

Us Dept Of Education
Attn: Borrowers Service Dept
Po Box 5609
Greenville, TX 75403

Wfnnb/ann Taylor
Po Box 182273
Columbus, OH 43218

Vegas Valley Collection Services
P.O. Box 98344
Las Vegas, NV 89193-0344

Wfnnb/express
Attn: Bankruptcy
Po Box 18227
Columbus, OH 43218

Volvo Finance Na
P.o. Box 542000
Omaha, NE 68154

Wfnnb/j Crew
Po Box 182273
Columbus, OH 43218

VRI HOA
P.O. box 3620
Laguna Hills, CA 92654

World Omni F
6150 Omni Park Dr
Mobile, AL 36609

Zions Bank
Angela Stephenson
One South Main, Suite 1100
Salt Lake City, UT 84133-1109

Nevada State Bank
Attn: Mike Hanley
400 Green Valley Pkwy, 2nd Floor
Henderson, NV 89074

McLeod Business Centre
c/o Allesi & Koenig
9500 W. Flamingo Road, Ste. 205
Las Vegas, NV 89147

Zunesis, Inc.
9000 E. Nichols Avenue, Ste. 150
Englewood, CA 80112

I HEREBY CERTIFY that true and correct copies of the following:

1. Motion of the Debtor for the Entry of an Order: (i) Approving the Disclosure Statement; (ii) Approving the Form of Ballots and Proposed Solicitation and Tabulation Procedures; (iii) Fixing the Voting Deadline with Respect to the Debtor's Chapter 11 Plan; (iv) Prescribing the Form and Manner of Notice Thereof; (v) Fixing the Last Date for Filing Objections to the Chapter 11 Plan; (vi) Scheduling a Hearing to Consider Confirmation of the Chapter 11 Plan; and (vii) Appointing the Schwartz Law Firm, Inc. as Solicitation and Tabulation Agent;
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were sent via Regular US Postal Mail on January 22, 2013, to the following:

United States Trustee
300 Las Vegas Blvd. South #4300
Las Vegas, NV 89101

GE Money Bank
c/o Recovery Management Systems Corp.
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605
Attn: Ramesh Singh

United One Equities, LLC
1101 East Tropicana Avenue, Suite 2119
Las Vegas, NV 89119

GE Capital Retail Bank
c/o Recovery Management Systems Corp.
Attn: Ramesh Singh
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Troy A. Wallin, Esq.
Wallin Harrison PLC
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

American Express Bank, FSB
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355 0701

Ascension Capital Group, Inc.
Attn: BMW Bank of North America, Inc
P.O. Box 201347
Arlington, TX 76006

Stephanie L. Cooper, Esq.
THE COOPER CASTLE LAW FIRM
A Multi-Jurisdictional Law Firm
820 South Valley View Blvd.
Las Vegas, NV 89107

Kristin A. Schuler-Hintz, Esq.
McCarthy & Holthus, LLP
9510 West Sahara Avenue, Ste. 110
Las Vegas, NV 89117

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Clark County Treasurer
Reference #138-19-818-006
500 S. Grand Central Pkwy
P.O. Box 551220
Las Vegas, NV 89155-1220

Nevada Department of Taxation
Bankruptcy Section
555 E. Washington Avenue, #1300
Las Vegas, NV 89101-1046

Dept. of Employment, Training & Rehab
Employment Security Division
500 East Third Street
Carson City, NV 89713-0002

State of Nevada Dept. of Motor Vehicles
Attn: Legal Division
555 Wright Way
Carson City, NV 89711-0001

Clark County Assessor
c/o Bankruptcy Clerk
500 S Grand Central Pkwy
Box 551401
Las Vegas, NV 89155-1401

/s/ Janine Lee
Janine Lee

Exhibit G

Page 113

1 A. It's defunct. It was an art gallery that Sig
2 owned with some other people, and it was defunct prior
3 to or about the time of my employment with the Rogich
4 Communications Group.
5 Q. So prior to about 2000?
6 A. Yes.
7 Q. Do you know, is Olaphia, LLC, still active?
8 A. There's nothing in that.
9 Q. Do you know if Mr. Rogich has any other
10 trusts?
11 A. Yes.
12 Q. And what are they?
13 A. The Rogich Family Trust.
14 Q. Okay. Any others?
15 A. The Sigmund Rogich 2004 Family Irrevocable
16 Trust.
17 Q. Is that different than the one that --
18 A. Yes. Our estate attorney didn't do us any
19 favors.
20 Q. Okay. Do you know when those were set up?
21 A. 2004. The Rogich Family Trust was 1982.
22 Q. Do you know if Mr. Rogich is the beneficiary
23 for any other trusts?
24 A. I don't believe so.
25 Q. Prior to Carlos' buyout in 2008, did you

Page 114

1 communicate with Summer Rellamas regularly?
2 A. Yes.
3 Q. What were the communications that you had with
4 her?
5 A. We had a lot of communications.
6 Q. Discussing the transactions between the
7 parties?
8 A. Yes.
9 Q. I'm going to hand you a document. I'm not
10 going to mark it as an exhibit just yet. I just want
11 you to take a look at it.
12 MR. McDONALD: Here, Sam.
13 MR. LIONEL: Thank you.
14 BY MR. McDONALD:
15 Q. Do you recognize this document?
16 A. Yes.
17 Q. Do you know what -- or how do you recognize
18 it?
19 A. It's not the right draft of the one that we
20 used. I think it's probably like the first one that
21 Summer gave me.
22 Q. So you believe that this was sent to you by
23 Summer?
24 A. Yes.
25 Q. Okay. In 2008?

Page 115

1 A. Yes.
2 Q. October?
3 A. Yes.
4 Q. Okay. Do you believe that -- well, you said
5 that there was multiple drafts of this?
6 A. Yes.
7 Q. Okay. And what changed?
8 A. This number, as you referenced on the other
9 document, is now 2.7 something --
10 Q. Right.
11 A. -- and so I just remember she sent an updated
12 one of these with that number on it.
13 Q. Do you know what was changed?
14 A. Not off the top of my head.
15 Q. Or why?
16 A. No.
17 Q. Do you know if it was decreased by the amounts
18 contributed by Jared Smith, Craig Dunlap and Eric Rietz?
19 A. I don't.
20 Q. And do you recall seeing Nanyah Vegas on this
21 document for \$1.5 million through Canamex Nevada, LLC?
22 A. Yes.
23 Q. And the total at the bottom, it appears these
24 are capital contributions in an amount of \$6,821,046.10.
25 Do you see that?

Page 116

1 A. Yes.
2 Q. Do you believe those amounts are accurate?
3 A. I think we have gone through each of those.
4 So if you want to go back through them, we can.
5 Q. Do you believe that The Rogich Family
6 Irrevocable Trust contributed that \$2,141,625 at that
7 time?
8 A. Yes.
9 Q. And we did go over Go Global. Do you dispute
10 that amount at the top other than the fact that it
11 changed to 2.7 million?
12 A. I told you that the tax accountants were
13 questioning the \$600,000.
14 Q. 600,000? Other than the 600,000, did you have
15 any disputes as to this number?
16 A. As the capital balance at that time, no.
17 MR. McDONALD: Did we mark that -- I'll mark
18 that as an exhibit. I'm sorry, I didn't know if you
19 were going to actually recognize it or not.
20 10, Exhibit 10.
21 (Exhibit 10 was marked.)
22 BY MR. McDONALD:
23 Q. Were you aware that Carlos filed Chapter 11
24 bankruptcy?
25 A. Yes.

Page 117

1 Q. How did you find out about that?

2 A. They noticed us. I mean, we received a notice

3 in the mail.

4 Q. When did that happen? Do you recall?

5 A. No.

6 Q. Do you know the reason why he filed

7 bankruptcy?

8 A. No.

9 Q. Okay. Did you ever discuss with him any

10 dealings with a man named Hugo Paulson?

11 A. Yes.

12 Q. H-u-g-o. And what was discussed with regards

13 to that?

14 A. I remember there was a lawsuit. They had a

15 lawsuit. I don't remember what else.

16 Q. Carlos and Hugo?

17 A. Yes.

18 Q. Are you aware of the outcome of that case at

19 all?

20 A. No.

21 Q. Going back to just decisions at your office

22 regarding writing of checks, do you have ultimate say as

23 to what gets paid, or is that Sig?

24 A. Sig.

25 Q. Do you direct your assistant to print out

Page 118

1 certain checks for your signature?

2 A. She puts the checks in accounts payable. Then

3 she clicks on them to be paid. I look at them, and I

4 say "Yes, pay them" or "No, don't pay them."

5 Q. Those are standard transactions, right? When

6 you receive a bill, she enters them in?

7 A. Yes, uh-huh.

8 Q. What about nonstandard bills like, you know, a

9 payback of a loan to somebody that is not an every-month

10 kind of thing? Do you direct her to print out a check

11 for that kind of thing?

12 A. It varies.

13 Q. But occasionally you do?

14 A. Occasionally I print out checks?

15 Q. Uh-huh.

16 A. Yes.

17 Q. I'm assuming every check isn't run by Sig,

18 correct?

19 A. Correct.

20 Q. What types of checks do you have to run by

21 Sig?

22 A. Large dollar amount, out of the ordinary

23 checks.

24 Q. The ones I was referring to earlier?

25 A. Yes.

Page 119

1 MR. McDONALD: Okay. I'm almost done. Let me

2 just take a minute to talk to my client, and then we'll

3 be back. I think we'll be about done.

4 (Recess taken.)

5 BY MR. McDONALD:

6 Q. All right, are you ready?

7 A. Yes.

8 Q. Just a few follow-up questions.

9 Mr. Rogich in his deposition testified that

10 Mr. Eliades had invested approximately \$23 million or so

11 into Eldorado Hills. Do you recall that?

12 A. Yes.

13 Q. Do you know what his initial investment was?

14 A. 6 million.

15 Q. Did he eventually pay \$10 million to ANB

16 Financial?

17 A. No, he didn't pay it to ANB Financial. He

18 paid it to the person that bought the loan pool from the

19 FDIC.

20 Q. Okay.

21 A. Because remember I told you we were sold,

22 since we got the 5 million, we were sold as a performing

23 note.

24 Q. Right.

25 Okay. So 10 million and then the initial 6

Page 120

1 million. What accounts for the other \$7 million?

2 A. The other \$7 million -- Pete put all kinds of

3 money into the property paying for -- well, first of

4 all, those carry interest, an interest component. The

5 16 million carries an interest component. Pete put all

6 kinds of money into the property. He built two gun

7 ranges. He graded a bunch of the property. He bought

8 tanks. He built a restaurant. He made all kinds of

9 roads and moved towers. So essentially that was the --

10 that's the rest of it.

11 Q. Did he -- did he send you documents

12 demonstrating how much he was putting in?

13 A. No. He did not send me documents.

14 Q. How did you obtain the \$7 million figure I

15 guess is what I'm --

16 A. His bookkeeper told me that we needed to go

17 over some things because Pete had a huge loan to the

18 club and to Eldorado Hills on his books.

19 Q. Who was his bookkeeper?

20 A. Her name was Vallee Swan, V-a-l-l-e-e,

21 S-w-a-n. She's no longer with them. She has cancer.

22 Q. Do you know who is his new bookkeeper?

23 A. I don't. Natalie at Bradshaw Smith is

24 handling things for him, Natalie -- I forgot --

25 Marshall, Natalie Marshall.

Exhibit H

Label Matrix for local noticing
0978-2
Case 10-14804-led
District of Nevada
Las Vegas
Wed Aug 20 15:06:49 PDT 2014

CHARLESTON FALLS, LLC
3060 E. POST ROAD, SUITE 110
LAS VEGAS, NV 89120-4449

HPCH, LLC
3060 E. POST ROAD, STE. 110
LAS VEGAS, NV 89120-4449

Nationstar Mortgage LLC.
608 South 8th Street
Las Vegas, NV 89101-7005

UNITED ONE EQUITIES, LLC (all)
UNITED ONE EQUITIES, LLC
1101 E. TROPICANA AVE., STE 2119
LAS VEGAS, NV 89119-6629

AZURE SEAS, LLC C/O HUGO R. PAULSON
LIONEL SAWYER & COLLINS
ATTN: JENNIFER A. SMITH
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RENO, NV 89501-1951

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Ra-anana, Israel 43214

(p)BANK OF AMERICA
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EL PASO TX 79998-2238

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Las Vegas, NV 89120-4449

Dept of Employment, Training and Rehab
Employment Security Division
500 East Third Street
Carson City, NV 89713-0002

AMERICAN EXPRESS BANK FSB
C/O BECKET AND LEE LLP
POB 3001
MALVERN, PA 19355-0701

Citibank, N.A.
701 East 60th Street North
SIOUX FALLS, SD 57104-0493

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3320 WEST SAHARA AVENUE
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RECOVERY MANAGEMENT SYSTEMS CORPORATION
25 S.E. SECOND AVENUE
INGRAHAM BUILDING, SUITE 1120
MIAMI, FL 33131-1605

WESTERN NATIONAL TRUST COMPANY
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3800 HOWARD HUGHES PKWY, STE 1400
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PO Box 0001
Los Angeles, CA 90096-0001

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GO GLOBAL, INC.
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NEVADA STATE BANK
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7371 PRAIRIE FALCON RD, STE 120
LAS VEGAS, NV 89128-0834

U.S. TRUSTEE - LV - 11 11
300 LAS VEGAS BOULEVARD S.
SUITE 4300
LAS VEGAS, NV 89101-5803

United States Bankruptcy Court
300 Las Vegas Blvd., South
Las Vegas, NV 89101-5833

Antonio Nevada, LLC
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Las Vegas, NV 89148-5007

Bailus Cook & Kelesis
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Gordon & Silver
3960 Howard Hughes Pkwy
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HUGO R. PAULSON, AS TRUSTEE OF HUGO R. PAULSON
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CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
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Kolesar & Leatham, Chtd.
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MAC X2303-01A
1 HOME CAMPUS
1ST FLOOR
DES MOINES IA 50328-0001

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LAS VEGAS, NEVADA 89128-0834

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Las Vegas, NV 89101-1046

Nevada State Bank
Acct No 0180910033179005001
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Las Vegas, NV 89125-0990

One Cap Financial
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3rd Floor
Las Vegas, NV 89146-0354

Park City Homeowner's Association
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Salt Lake City, UT 84117-1439

Phillip M. Stone
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Ste. 2040
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Ray Koroghli
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Henderson, NV 89052-4031

Recovery Management Systems Corporation
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Miami, FL 33131-1605

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ATLANTA, GA 30309-3592

Sigmund Rogich
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Las Vegas, NV 89169-6751

Sweetwater Lift Lodge
1255 Empire Avenue
Park City, UT 84060

THE LIONEL FOUNDATION
c/o SAMUEL S. LIONEL
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United States Trustee
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Las Vegas, NV 89101-5803

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Idaho Falls, ID 83402

Zions Bank
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MARK G SIMONS
ROBISON, BELAUSTEGUI, SHARP & LOW
71 WASHINGTON ST
RENO, NV 89503-5636

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank Of America	Citibank South Dakota NA	IRS
Acct No 68181004915099	DBA	P.O. Box 21126
Po Box 26078	4740 121st St	DPN 781
Greensboro, NC 27420	Urbandale, IA 50323	Philadelphia, PA 19114

Meridian Financial Services, Inc.
P.O. Box 1410
Asheville, NC 28802-1410

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ORDINARY COURSE PROFESSIONALS	(u)WELLS FARGO BANK, N.A.	(d)AMERICAN EXPRESS BANK FSB C/O BECKET AND LEE LLP POB 3001 MALVERN PA 19355-0701
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(d)HPCH, LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120-4449	(d)CARLOS A. HUERTA 3060 E. POST RD. #110 LAS VEGAS, NV 89120-4449	End of Label Matrix Mailable recipients 61 Bypassed recipients 5 Total 66
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Exhibit J


CLERK OF THE COURT

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
Schwartz Flansburg PLLC
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; GO
GLOBAL, INC., a Nevada corporation, as
assignee of interests of THE ALEXANDER
CHRISTOPHER TRUST, a Trust established in
Nevada; NANYAH VEGAS, LLC, a Nevada
limited liability company,

Plaintiffs,

v.

SIG ROGICH aka SIGMUND ROGICH as
Trustee of The Rogich Family Irrevocable Trust;
ELDORADO HILLS, LLC, a Nevada limited
liability company; DOES I-X; and/or ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. A-13-686303-C

Dept. XXVII

**PLAINTIFFS' MOTION FOR
RECONSIDERATION OR RELIEF
FROM ORDER GRANTING
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

**PLAINTIFFS MOTION FOR RECONSIDERATION OR RELIEF FROM
ORDER GRANTING MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiffs Carlos A. Huerta and Go Global, Inc., as assignee of the interests and claims of
The Alexander Christopher Trust, a Trust established in Nevada (collectively, the "**Plaintiffs**"),
by and through their attorneys of record, Schwartz Flansburg PLLC, hereby file their Motion for
Reconsideration or Relief from Order Granting Motion for Partial Summary Judgment. This
Motion is made and based upon the pleadings and papers on file herein, the following

1 Memorandum of Points & Authorities, and any oral argument entertained by the Court at the
2 time of the hearing on this matter.

3 Dated this 22nd day of February, 2016.

4
5 SCHWARTZ FLANSBURG PLLC

6 By: /s/ Samuel A. Schwartz
7 Samuel A. Schwartz, Esq.
8 Nevada Bar No. 10985
9 Bryan A. Lindsey, Esq.
10 Nevada Bar No. 10662
11 Schwartz Flansburg PLLC
12 6623 Las Vegas Blvd. South, Suite 300
13 Las Vegas, Nevada 89119
14 Attorneys for Plaintiffs

15 **NOTICE OF MOTION**

16 You and each of you, will please take notice that the MOTION FOR
17 RECONSIDERATION OR RELIEF FROM ORDER GRANTING PARTIAL SUMMARY
18 JUDGMENT will come on regularly for hearing on the 29 day of March, 2016, at the
19 In Chambers
20 hour of _____ ~~XXX~~, or as soon thereafter as counsel may be heard, in Department XXVII
21 in the above-referenced court.

22 Dated this 22nd day of February, 2016.

23 SCHWARTZ FLANSBURG PLLC

24 By: /s/ Samuel A. Schwartz
25 Samuel A. Schwartz, Esq.
26 Nevada Bar No. 10985
27 Bryan A. Lindsey, Esq.
28 Nevada Bar No. 10662
Schwartz Flansburg PLLC
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Attorneys for Plaintiffs

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1 4. Accordingly, the Plaintiffs now bring this Motion for Reconsideration or Relief
2 from Order Granting Partial Summary Judgment. As all of the Plaintiffs' creditors were paid in
3 full under the Plan, the disclosure of the Plaintiffs' claims against Rogich in the Disclosure
4 Statement is irrelevant. In fact, the lack of a discussion of the Plaintiffs' claims did not have any
5 impact on the return to creditors, as they are now paid. Importantly, the Plaintiff's claims (via
6 the Trust) are still timely under Nevada law, and should be vetted on their merits.
7

8
9 5. The Plan provided that creditors would be paid in full, and as of February 10,
10 2016, creditors in fact, were paid in full. Thus, this Motion should be granted.
11

12 Argument

13 A. **Current Procedural Posture and Applicable Standard.**

14 **The Partial Summary Judgment Order and the Findings of Fact and Conclusions**
15 **of Law are a Partial Adjudication Only, and thus are Interlocutory, Not Final.**
16

17 6. The Court's Partial Summary Judgment Order and related Findings of Fact and
18 Conclusions of Law are only a partial adjudication of this matter, and thus are only an
19 interlocutory, not final decision. See Liberty Mut. Ins. Co. v. Wetzel, 424 U.S. 737, 744 (1976)
20 (holding that orders granting partial summary judgment "are by their terms interlocutory");
21 Pintlar Corp. v. Fidelity and Cas. Co. of N.Y. (In re Pintlar Corp.), 124 F.3d 1310, 1312 (9th Cir.
22 1997).
23
24

25 7. Importantly, the Partial Summary Judgment Order only adjudicated Huerta's and
26 Go Global's claims against Rogich (via the trust), and did not decide the rights of the remaining
27 plaintiff, Nanyah Vegas, LLC, and thus is interlocutory. Although the Order indicated that on
28 October 1, 2014, an Order Granting Partial Summary Judgment dismissing Plaintiff Nanyah
Vegas, LLC's Fourth claim for relief, such order was reversed and remanded by the Nevada
Supreme Court on February 12, 2016. See Order of Reversal and Remand, a copy of which is

1 attached hereto as **Exhibit E**.

2 8. As a result of the Partial Summary Judgment Order being interlocutory, the
3 normal post-judgment avenues for relief -- Rules 59(e), 52(b) and/or 60(b) -- are not presently
4 available to the Plaintiffs, as those all require entry of a final judgment before such relief is
5 available.¹ As set forth below, however, the Plaintiffs may still seek reconsideration and relief
6 from the Partial Summary Judgment Order prior to the entry of a final judgment herein.
7

8 9. Moreover, this Court also has inherent authority to reconsider its prior orders.
9
10 Masonry & Tile Constrs. V. Jolley Urga & With, Ltd., 941 P.2d 486, 489 (1997) (stating that “A
11 district court may reconsider a previously decided issue if substantially different evidence is
12 subsequently introduced or the decision is clearly erroneous.”); Trail v. Faretto, 536 P.32d 1026,
13 1027 (Nev. 1975) (a district court may “for sufficient cause shown, amend, correct, resettle,
14 modify or vacate, as the case may be, an order previously made . . . “). Moreover, this Court
15 may entertain rehearing if it finds that it overlooked a germane legal or factual matter, which
16 resulted in an erroneous decision. Cannon v. Taylor, 493 P.2d 1313, 1314-15 (1972).
17
18

19
20 **Given the Interlocutory Nature of the Summary Judgment Order, the Court Can**
21 **Reconsider and Grant Relief from It and Any Other Previous Order Entered in the Case.**

22 10. This Motion is permitted pursuant to Rule 54(b) of the Nevada Rules of Civil
23 Procedure and the Court’s inherent power as derived from common law. Specifically, Rule
24 54(b), provides as follows:
25

26 When multiple parties are involved, the court may direct entry of a final judgment
27

28 1 Given the lack of a final judgment in the case at hand, relief pursuant to Rules 59(e) and/or 52(b)
is not presently available. See Balla v. Idaho State Bd. or Corrs., 869 F.2d 461, 466-67 (9th Cir. 1989);
Winnemucca Farms, Inc. v. Eckersell, 2009 WL 1328870, at *1 n.1 (D. Nev. May 12, 2009). Likewise,
relief pursuant to Rule 60(b) is also not presently available because of the lack of a final judgment. See
Prudential Real Estate Affiliates, Inc. v. PPR Realty, Inc., 204 F.3d 867, 880 (9th Cir. 2000); In re LDK
Solar Secs, Litig., 584 F.Supp. 2d 1230-1252-53 (N.D. Cal. 2008); Santamarina v. Sears, Roebuck & Co.,
466 F.3d 570, 572 (7th Cir. 2006).

1 as to one or more but fewer than all of the parties only upon an express
2 determination that there is no just reason for delay and upon an express direction
3 for the entry of judgment. In the absence of such determination and direction, any
4 order or other form of decision, however designated, which adjudicates the rights
5 and liabilities of fewer than all the parties shall not terminate the action as to any
6 of the parties, and the order or other form of decision is subject to revision at any
7 time before the entry of judgment adjudicating all the rights and liabilities of the
8 parties.

9 Nev. R. Civ. P. 54(b) (emphasis added).

10 11. “[A] district court has the inherent power to reconsider and modify its
11 interlocutory orders prior to the entry of judgment . . .” Smith v. Massachusetts, 543 U.S. 462,
12 475 (2005) (internal quotes omitted) (Ginsburg, J., dissenting); City of Los Angeles, Harbor Div.
13 v. Santa Monica Baykeeper, 254 F.3d 882, 885-89 (9th Cir. 2001) (noting that such authority
14 derives from common law); School Dist. No. 5 v. Lungren, 259 F.2d 101, 105 (9th Cir. 1958);
15 see also Lemmons v. Georgetown Univ. Hosp., 241 F.R.D. 15, 21-22 (D.D.C. 2007).²

16 12. Although a motion to alter or amend a judgment pursuant to Rule 59(e) may not
17 technically be available given the lack of a final judgment in this case, Nevada courts have still
18 used that same standard by analogy in deciding whether to grant relief from an interlocutory
19 order. See Keating v. Gibbons, 2009 WL 764546, at *1 (D. Nev. Mar. 20, 2009).

20 13. Under NRCP 59(e), the Court may grant reconsideration or rehearing when “new
21 issues of fact or law are raised supporting a ruling contrary to the ruling already reached”
22 Moore v. City of Las Vegas, 92 Nev. 402, 405, 551 P.2d 244, 246 (1976). Reconsideration is
23 also appropriate when “substantially different evidence is subsequently introduced or the
24 decision is clearly erroneous.” Masonry and Tile Contractors Ass’n of S. Nevada v. Jolley,

25 Federal cases interpreting the Federal Rules of Civil Procedure are “strong persuasive authority”
26 for Nevada courts in interpreting the Nevada Rules of Civil Procedure because the Nevada Rules “are
27 based in large part upon their federal counterparts.” Executive Mgmt. Ltd., v. Ticor Title Ins. Co., 118
28 Nev. 46, 53, 38 P.3d 872, 876 (2002); Nelson v. Heer, 121 Nev. 823, 834, 122 P.3d 1252, 1253 (2005).

1 Urga & Wirth, Ltd., 113 Nev. 737, 741, 941 P.2d 486, 489 (1997). Upon granting
2 reconsideration, “the court may make a final disposition of the cause without reargument or may
3 reset it for reargument or resubmission or may make such other orders as are deemed appropriate
4 under the circumstances of the particular case.” EDCR 2.24(c).

6 14. Here, the Plaintiffs request that the Court reconsider its Partial Summary
7 Judgment Order because the Plaintiff’s payoff of all creditors under their Plan in the Bankruptcy
8 Case is substantially different evidence, which shows that this motion is necessary to correct
9 manifest errors of law or fact upon which the judgment is based and is necessary to prevent
10 manifest injustice to the Plaintiffs.
11

13 **If Applicable, Nevada Rule of Civil Procedure 60 Also Supports Reconsideration**

14 15. Nevada Rule of Civil Procedure 60(b) is modeled on the Federal Rules of Civil
15 Procedure, as written before the amendment of the Federal Rules in 2007. See NC–DSH, Inc. v.
16 Garner, 125 Nev. 647, 650–51 nn. 1 & 2 (2009). Similarly, NRCP 60(b) permits relief from an
17 order of the Court by motion or separate action. In connection with motions, NRCP 60(b)
18 specifies permissible grounds, with some time limits in certain circumstances, however, the rule
19 does not limit the power of this court to entertain an independent action to relieve a party from a
20 judgment, order, or proceeding, or to set aside a judgment for fraud upon the court. See Bonnell
21 v. Lawrence, 282 P.3d 712, 714 (2012). The Plaintiffs submit that in light of the facts and
22 circumstances of this case, including both the remand of the Nanya Vegas, LLC claims, as well
23 as the payment of all creditors in the Bankruptcy Case, relief from the Partial Summary
24 Judgment is warranted and should be the result here.
25
26
27
28

16. Indeed, it is not disputed the Rogich parties were never the intended as
beneficiaries of the Disclosure Statement or the Plan. They were not creditors whose votes

1 needed solicitation. Therefore, the failure to disclose this litigation had no impact on the Rogich
2 parties. Critically, now that all unsecured creditors are paid in the Bankruptcy Case, the failure
3 to discuss this action had no impact on Go Global's creditors. Accordingly, to the extent
4 necessary or appropriate, the Summary Judgment Order should be lifted under NRCP 60(b) as
5 well.
6

7
8 **B. The Plaintiffs Paid All Unsecured Creditors**
9 **In Full Pursuant to their Chapter 11 Plan**

10 17. At its oral ruling on October 8, 2014, this Court stated that in Chapter 11
11 bankruptcy, "you declare your assets and then you tell creditors through a disclosure statement
12 how you will use assets to pay creditors." See October 8, 2014 Transcript, p. 2, ll. 12-14, a copy
13 of which is attached hereto as **Exhibit F**. Similarly, the Court later stated: "[I]n the Chapter 11
14 process you have the listing of assets then you have a disclosure statement that tells creditors
15 how they will get paid and then the plan really just says how much they'll get paid and when."
16 Id. at p. 3, ll. 13-16. Finally, this Court stated that the Plaintiffs' failure to list their claim against
17 Rogich in their Disclosure Statement "evidences no intention that the creditors of Go Global
18 would ever, ever, have benefited from this transaction." Id. at p. 3, ll. 22-23.
19
20

21
22 18. Simply put, this Court's granting of Rogich's Partial Motion for Summary
23 Judgment was based solely on the failure to disclose the Plaintiffs' claim against Rogich in their
24 Disclosure Statement, not the merits of the claims. Importantly, however, the Plan provided that
25 creditors would be paid 100% of their allowed claims. On February 10, 2016, all allowed claims
26 under the Plan were paid in full. See Exhibits B through D, attached hereto. With all creditors
27 paid in full pursuant to the Plan, the failure to list the Rogich claims specifically in the
28 Disclosure Statement is irrelevant, as it had no impact on creditors' recoveries.

19. Section 1125 of the United States Bankruptcy Code requires a disclosure

1 statement to contain adequate information of a kind that would enable a hypothetical reasonable
2 investor to make an informed judgment about a debtor's plan. 11 U.S.C. § 1125. Importantly,
3 however, "nonsubmissions of disclosure statements only operate to prevent solicitations of
4 acceptances or rejections of the plan," and that where no solicitations are made, no disclosure
5 statement is required. In re Bel Air Assocs., Ltd., 4 B.R. 168 (Bankr. W.D. Okla. 1980).

6
7
8 20. Moreover, in cases where claims or interests are not impaired under a plan, they
9 are "conclusively presumed" to have accepted the plan and the plan proponent is not required to
10 file a disclosure statement or solicit their votes. See In re Entz-White Lumber & Supply, Inc.,
11 850 F.2d 1338, 1340 n. 3 (9th Cir. 1988); In re Amster Yard Associates, 214 B.R. 122, 124 n. 5
12 (Bankr. S.D.N.Y. 1997) ("If all classes are unimpaired and no solicitation is required, the court
13 does not have to approve a disclosure statement prior to confirmation, if ever."); In re Highway
14 Truck Drivers & Helpers, Teamsters Local No. 107, 100 B.R. 209, 213 (Bankr. E.D. Pa. 1989)
15 ("[I]f all creditors were unimpaired by its plan of reorganization, there would be no need for a
16 disclosure statement as all creditors presumptively vote in favor of the plan."); In re Chiapetta,
17 159 B.R. 152 (Bankr. E.D. Pa. 1993) ("[S]ince no classes of claimants are impaired by the
18 Debtor's Plan, no disclosure statement is required.").

19
20
21
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23 21. Simply put, based on the case law above and the fact that the Plaintiffs paid all
24 allowed claims in full under their Plan, it is irrelevant whether the Plaintiffs detailed the Rogich
25 claims in this case. The Plaintiffs' creditors suffered no harm, and as a result, the Court's prior
26 Partial Summary Judgment Order dismissing the Plaintiffs' claims against Rogich for failure to
27 list such claims in their Disclosure Statement would result in a manifest injustice to the Plaintiffs.
28 The Plaintiffs paid all allowed claims under their Plan, and should be allowed to proceed with
their claims against Rogich and other defendants as if the Bankruptcy Case never occurred.

1 22. Finally, the facts of this case are nearly identical to The Glazier Group, Inc. v.
2 Premium Supply Co., Inc., 2013 WL1727155 (N.Y. Sup. Ct., April 16, 2013). In Glazier Group,
3 a Chapter 11 debtor had causes of action arise against a creditor post-petition, during the Chapter
4 11 proceedings and after the Bankruptcy Court entered an order disallowing the same creditor's
5 claims in the bankruptcy case. Glazier Group, 2013 WL 1727155, *3. The Glazier Group debtor
6 ultimately brought suit against the creditor, who in turn argued the claims should be dismissed
7 because they were not disclosed in the debtor's disclosure statement. Id. The Supreme Court,
8 New York for New York County, rejected these arguments.

9 23. Specifically, the New York State Court recognized that "[i]t is neither reasonable
10 nor practical to expect a debtor to identify in its plan of reorganization or disclosure schedules
11 every outstanding claim it intends to pursue with a degree of specificity that [defendants] would
12 require." Id. at *6. In other words, defendants in lawsuits filed by reorganized debtors cannot
13 assume that a debtor's failure to list in its disclosure statement each lawsuit it may bring post-
14 confirmation will bar the reorganized debtor from prosecuting those claims after it emerges from
15 bankruptcy.

16 24. Interestingly, the New York State Court found persuasive the debtor's argument
17 that the disclosure of an additional \$300,000 claim in the case would not have materially affected
18 the votes on the plan. Id. at *5. Therefore, the Glazier Group debtor's failure to explicitly
19 disclose its claim against a creditor did not prevent the claim from re-vesting in the reorganized
20 company. Id. at *6. The same result should occur here.

21 25. This case also draws an important distinction from those cases holding that a
22 chapter 11 debtor's failure to disclose potential causes of action against the debtor's creditors in
23 its disclosure statement precludes the debtor from litigating those claims post-confirmation.
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1 Those cases recognize that a creditor may vote differently on a debtor's plan if the creditor is
2 aware that it could face potential litigation from the debtor after confirmation. Here, however,
3 the Rogich parties were not creditors in the Bankruptcy Case, and had no right to vote.
4 Moreover, now that all creditors are paid in the Bankruptcy Case, there can be no argument the
5 failure to list the Rogich claims in the Disclosure Statement affected the voting. Simply put, the
6 Plaintiff's claims should go forward on their merits, and the Plaintiffs need to have their day in
7 court.
8

9 Conclusion

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11
12 26. For the reasons stated above, this Court should grant the Plaintiffs' Motion and
13 vacate the prior Partial Summary Judgment Order granted in favor of Rogich.
14

15 Dated this 22nd day of February, 2016.

16 SCHWARTZ FLANSBURG PLLC

17 By: /s/ Samuel A. Schwartz
18 Samuel A. Schwartz, Esq.
19 Nevada Bar No. 10985
20 Bryan A. Lindsey, Esq.
21 Nevada Bar No. 10662
22 Schwartz Flansburg PLLC
23 6623 Las Vegas Blvd. South, Suite 300
24 Las Vegas, Nevada 89119
25 Telephone: (702) 385-5544
26 Facsimile: (702) 385-2741
27 Attorneys for Plaintiffs
28

CERTIFICATE OF SERVICE

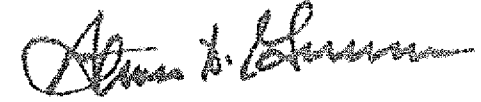
I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Regular
U.S. Mail to the following on February 22, 2016:

Eldorado Hills, LLC
c/o Andrew M. Leavitt, Esq.
Matthew D. Cox, Esq.
Law Office of Andrew M. Leavitt, Esq.
633 South Seventh Street
Las Vegas, NV 89101

Sig Rogich, as Trustee of the Rogich Family Irrevocable Trust
c/o Samuel S. Lionel, Esq.
Brenoch R. Wirthlin, Esq.
Fennemore Craig, P.C.
300 South Fourth Street, Ste. 1400
Las Vegas, NV 89101

/s/ Christy L. Cahall
Christy L. Cahall

EXHIBIT A



CLERK OF THE COURT

1 **ORD**
2 Samuel S. Lionel, NV Bar No. 1766
3 *slionel@lionelsawyer.com*
4 LIONEL SAWYER & COLLINS
5 300 South Fourth Street, 17th Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 383-8884
8 Fax: (702) 383-8845
9 *Attorneys for Defendant*

6 **DISTRICT COURT**
7
8 **CLARK COUNTY, NEVADA**

9 CARLOS A. HUERTA, an individual;
10 CARLOS A. HUERTA as Trustee of THE
11 ALEXANDER CHRISTOPHER TRUST, a
12 Trust established in Nevada as assignee of
13 interests of GO GLOBAL, INC., a Nevada
14 corporation; NANYAH VEGAS, LLC, a
15 Nevada limited liability company,

16 Plaintiffs,

17 v.

18 SIG ROGICH aka SIGMUND ROGICH as
19 Trustee of The Rogich Family Irrevocable
20 Trust; ELDORADO HILLS, LLC, a Nevada
21 limited liability company; DOES I-X; and/or
22 ROE CORPORATIONS I-X, inclusive

23 Defendants.

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Case No. A-13-686303-C

Dept. XXVII

**ORDER GRANTING PARTIAL
SUMMARY JUDGMENT**

ORDER GRANTING PARTIAL SUMMARY JUDGMENT

I.

UNDISPUTED MATERIAL FACTS

1. In March 2010, Carlos Huerta, Christine H. Huerta (collectively "Huerta") and Go Global, Inc. ("Go Global") filed voluntary Bankruptcy Petitions in the United States Bankruptcy Court for the District of Nevada ("the Huerta Bankruptcy").
2. On July 22, 2013, an Order Confirming Third Amended Joint Chapter 11 Plan of Reorganization of Go Global, Inc., Carlos and Christine Huerta was duly entered in the Huerta Bankruptcy.
3. On November 7, 2012, Huerta and Go Global wrote The Rogich Family Irrevocable Trust ("Rogich Trust") claiming that because the Rogich Trust had transferred its membership interest in Eldorado Hills, LLC, it was in breach of the Purchase Agreement between the parties and offered mediation, the Purchase Agreement prerequisite to litigation.
4. On April 4, 2011, Huerta and Go Global filed a Joint Disclosure Statement in the Huerta Bankruptcy. The statement did not identify or mention the Purchase Agreement or the Rogich Trust.
5. Huerta and Go Global filed Amended Disclosure Statements on January 17, 2013, March 8, 2013 and April 8, 2013. None of those statements identify or mention the Purchase Agreement, any relationship between Huerta, Go Global and the Rogich Trust, any receivable or other indebtedness of the Rogich Trust, any liquidation analysis identifying or identifying a possible claim against the Rogich Trust. The Huerta and Go Global Plan also does not identify or mention any such information.
6. Disclosure Statements inform creditors how they will be paid and are used by creditors to determine whether or not to accept a Plan of Reorganization. The creditors of Huerta and Go Global were never informed there was a receivable from the Rogich Trust to be collected.

1 7. On November 7, 2012, when Huerta and Go Global sent their letter to the Rogich Trust,
2 Huerta and Go Global were aware that they had a claim against the Rogich Trust.

3 8. On June 18, 2013, Carlos Huerta filed a Declaration, under oath that stated in paragraph 4
4 thereof:

5 "In connection with confirmation of the Plan, I reviewed the Plan (as amended),
6 Disclosure Statement (as amended) and all related exhibits thereto. The statements in those
7 documents are true and accurate..." *N/A THIS Declaration allowed Huerta & Go Global to confirm a Ch. 11 Plan 7/22/13*

8 10. On July 30, 2013, Huerta and Go Global assigned to the Alexander Christopher Trust "all
9 money, assets or compensation remaining to be paid pursuant to the Purchase Agreement
10 or from any act of recovery seeking to enforce the obligations of the parties thereto.
11 Carlos Huerta and Christine Huerta are the grantors of said Trust and Carlos Huerta is
12 the Trustee of said Trust.

13 11. On July 31, 2013, Carlos Huerta individually and as Trustee of said Trust filed this action
14 against The Rogich Trust to recover the sum of \$2,747,729.50 allegedly due under the
15 Purchase Agreement.

16 LEGAL DETERMINATION

17 1. On November 7, 2012, Huerta and Go Global were aware that they had a claim against
18 the Rogich Trust.

19 2. The said claim was not disclosed in Huerta's and Go Global's First Amended, Second
20 Amended or Third Amended Disclosure Statements.

21 3. The said claim was not disclosed in Huerta's and Go Global's Plan or their first, second or
22 third Amendments to the Plan.

23 WHEREFORE IT IS ORDERED that The Rogich Family Irrevocable Trust's Motion for
24 Partial Summary Judgment be, and is hereby granted and the First, Second and Third claims for
25 relief of Carlos A. Huerta, individually and as Trustee of the Alexander Christopher Trust are
26 dismissed.

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AND WHEREAS on October 1, 2014, an Order Granting Partial Summary Judgment dismissing Plaintiff Nanyah Vegas', LLC's Fourth claim for relief was duly entered.

AND WHEREAS all claims for relief alleged in the Amended Complaint have been dismissed.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that the Amended Complaint herein, be, and it is, hereby dismissed.

DATED this 3 day of ^{November} ~~October~~, 2014.

Nancy L. Alif
DISTRICT COURT JUDGE

SUBMITTED:
LIONEL SAWYER & COLLINS

By: [Signature]
Samuel S. Lionel
300 S. Fourth Street, #1700
Las Vegas, NV 89101
Attorneys for Defendant

APPROVED
McDonald Law Offices, PLC

By: _____
Brandon McDonald
2505 Anthem Village Dr., Suite E-474
Henderson, NV 89052
Attorney for Plaintiffs

EXHIBIT B

Samuel A. Schwartz, Esq.
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Bryan A. Lindsey, Esq.
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Facsimile: (702) 385-2741
Attorneys for the Debtors

E-Filed: February 22, 2016

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	Hearing Date: March 29, 2016
Debtors.)	Hearing Time: 9:30 a.m.
)	

**MOTION TO CLOSE THE GO GLOBAL, INC. AND CARLOS A. HUERTA
AND CHRISTINE H. HUERTA CASES PURSUANT TO 11 U.S.C. § 350, RULE
3022 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE
3022 OF THE LOCAL RULES OF BANKRUPTCY PRACTICE OF THE UNITED
STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

Go Global, Inc. (“**Go Global**”) and Carlos A. Huerta and Christine H. Huerta (“**Huerta**”) (Go Global and Huerta are collectively referred to as “**Debtors**”), by and through their attorneys of record, The Schwartz Law Firm, Inc., file this motion (the “**Motion**”) seeking to close their bankruptcy cases (the “**Cases**”) pursuant to section 350 the Bankruptcy Code, Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 3022 of the Local Rules of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada (the “**Local Rules**”) and that their Cases be closed pursuant to a final decree. In support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1
2 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157
3 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before
4 this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

5
6 **PROCEDURAL AND FACTUAL BACKGROUND**

7 2. The Bankruptcy Case. On May 11, 2010 and May 23, 2010, Huerta and Go
8 Global retained the Schwartz Law Firm, Inc. (“SLF”) as bankruptcy counsel, respectively. On
9 March 18, 2010, Huerta filed a voluntary petition for relief under chapter 11 of the Bankruptcy
10 Code. On March 23, 2010, Go Global filed a voluntary petition for relief under chapter 11 of
11 the Bankruptcy Code.

12 3. On April 5, 2010, this Court entered an order jointly administering the Go
13 Global, Inc. case (10-14804) and the Carlos and Christine Huerta (10-14456) case. See Docket
14 No. 35. The Debtors continue to operate their business and manage their properties as debtors-
15 in-possession.
16

17 4. The Plan and Disclosure Statement. On April 4, 2011, debtors Go Global, Inc.
18 and Carlos and Christine Huerta filed their Joint Plan of Reorganization and Joint Disclosure
19 Statement. On January 17, 2013, the Debtors filed their First Amended Joint Plan of
20 Reorganization and First Amended Joint Disclosure Statement. On March 08, 2013, the
21 Debtors filed their Second Amended Joint Plan of Reorganization and Second Amended
22 Disclosure Statement. On March 28, 2013, the Debtors filed their Third Amended Joint Plan of
23 Reorganization (the “**Plan**”)¹ and Third Amended Joint Disclosure Statement (the “**Disclosure**
24 **Statement**”). By order dated April 8, 2013, this Court entered an order approving the
25
26

27

1 Capitalized terms used herein but not defined herein shall have the meanings ascribed to such terms in the Plan.

1 Disclosure Statement and solicitation of the acceptance of the Plan commenced on April 8,
2 2013.

3 5. The Plan allowed for the Debtors to reorganize their properties and business
4 affairs.

5 6. The Effective Date. On June 19, 2013, this Court confirmed the Plan at the
6 confirmation hearing. On July 22, 2013, this Court entered an order (the “**Confirmation**
7 **Order**”) confirming the Plan. The Plan became effective on October 6, 2014 (the “**Effective**
8 **Date**”).
9

10 7. On April 8, 2014, this Court entered a Discharge of Individual Debtor in a
11 Chapter 11 Case relative to Carlos A. Huerta and Christine H, Huerta. See Docket No. 169.

12 8. On February 10, 2016, all allowed unsecured claims pursuant to the Debtors’
13 Plan were paid in full. See Declarations of Samuel A. Schwartz and Carlos A. Huerta, attached
14 hereto as **Exhibits A and B**, respectively. All secured claims are being treated as set forth in
15 the Plan and in accordance with their respective loan agreements.
16

17 9. Statutory Fees. In accordance with Section 3.04 of the Plan, all fees payable
18 pursuant to section 1930 of title 28 of the United States Code (the “**Trustees’ Fees**”), as
19 determined by the Bankruptcy Court at the hearing on the Plan, were paid by the Debtors on or
20 before the Effective Date. The Trustees’ Fees continue to be paid to the Office of the United
21 States Trustee (“UST”) and upon information and belief, the Debtors are current with their
22 Trustees’ Fees.
23

24
25 **RELIEF REQUESTED**
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27

1 (Bankr. E.D.N.Y. 1999); In re JMP-Newcor Int'l, 225 B.R. 462, 465 (Bankr. N.D. Ill. 1998).
2 Rather, the six factors act as mere guidelines to aid a court in its determination. See In re Mold
3 Makers, Inc., 124 B.R. 766, 768-69 (Bankr. N.D. Ill. 1990). Such a fluid formula has produced
4 widely varying results. “At one extreme, an estate could be fully administered, when a Chapter
5 11 Plan is confirmed and the estate dissolved... [a]t the other extreme, an estate could be fully
6 administered when all that is called for under a plan occurs.” Id. at 768.
7

8 5. Finally, Rule 3022 of the Local Rules states that “[u]nless otherwise provided in
9 the plan or by court order, or unless there are pending contested matters or adversary
10 proceedings, a case is deemed fully administered 180 days after plan confirmation, and the
11 clerk may then enter a final decree without further notice.” LR 3022.

12 6. In this case, a final decree, as requested herein, is appropriate in the Closing
13 Debtors’ Chapter 11 cases. The Confirmation Order is final and non-appealable. The Plan has
14 been substantially consummated. Moreover, all pending motions are resolved, and there are no
15 pending motions, contested matters or adversary proceedings at this time. Furthermore, the
16 Debtors’ Chapter 11 cases were confirmed on July 22, 2013, more than 180 days ago.
17 Accordingly, the rights of creditors will not be adversely affected by the close of the Debtors’
18 Chapter 11 cases.
19

20 7. Finally, the Closing Debtors are nonetheless incurring Trustees’ Fees and will
21 continue to incur such fees until their cases are closed. Absent an order closing the Debtors’
22 cases, the Closing Debtors will be forced to incur the substantial and ongoing burden of paying
23 quarterly fees to the UST, despite having made all distributions under the Plan and having their
24 cases being fully administered. Entry of the final decree requested herein will avoid the
25 considerable administrative costs and expense associated with maintaining the Closing
26 Debtors’ Chapter 11 cases.
27

CONCLUSION

8. WHEREFORE, based on the foregoing, the Debtors respectfully request that the Court: (i) enter an order closing the Chapter 11 cases of Go Global, Inc. (Case No. 10-14804-LED) and Carlos A. Huerta and Christine H. Huerta (Case No. 10-14456-LED), and to the extent necessary under Rule 9006, the Final Decree be effective when the deadlines required by LR 3022.1 have passed, and (ii) any other relief that is necessary and proper.

Dated: February 22, 2016.

Respectfully submitted,

/s/ Samuel A. Schwartz Esq.

Samuel A. Schwartz, Esq.

Nevada Bar No. 10985

Bryan A. Lindsey, Esq.

Nevada Bar No. 10662

The Schwartz Law Firm, Inc.

6623 Las Vegas Blvd. South, Suite 300

Las Vegas, Nevada 89119

Telephone: (702) 385-5544

Facsimile: (702) 385-2741

Attorneys for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF System on February 22, 2016, to the following:

MICHAEL W. CHEN on behalf of Creditor CHASE HOME FINANCE, LLC F/K/A CHASE MANHATTAN MORTGAGE CORPORATION F/K/A CHASE MORTGAGE COMPANY
bknotice@mccarthyholthus.com,
mchen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

MICHAEL W. CHEN on behalf of Creditor CHASE MORTGAGE COMPANY/ CHASE HOME FINANCE LLC
bknotice@mccarthyholthus.com,
mchen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

FRANK A ELLIS, III on behalf of Respondent MT. CHARLESTON INVESTMENTS, LLC
fellis@lvbusinesslaw.com, laurenc@lvbusinesslaw.com;gailk@lvbusinesslaw.com

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JAMES A KOHL on behalf of Interested Party WESTERN NATIONAL TRUST COMPANY
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ANDREW M LEAVITT on behalf of Defendant ELDORADO HILLS, LLC
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ANDREW M LEAVITT on behalf of Defendant TELD, LLC
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12 GREGORY L. WILDE on behalf of Creditor WELLS FARGO BANK, N.A.
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14 BRENOCH R WIRTHLIN on behalf of Defendant SIG ROGICH
15 bwirthli@fclaw.com, aharris@fclaw.com

16 I HEREBY CERTIFY that in accordance with the Confirmation Order in this case (See
17 Docket No. 507) a true and correct copy of the foregoing was sent via U.S. REGULAR MAIL on
18 February 22, 2016, to the following:

19 United States Trustee
20 300 Las Vegas Blvd. South #4300
21 Las Vegas, NV 89101

22 /s/ Christy L. Cahall
23 Christy L. Cahall
24
25
26
27

EXHIBIT A

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	
Debtors.)	
)	

DECLARATION OF SAMUEL A. SCHWARTZ, ESQ.

SAMUEL A. SCHWARTZ, ESQ., being duly sworn, deposes and says:

1. I am the principal of The Schwartz Law Firm, Inc. (“SLF” or the “Firm”), 6623 Las Vegas Blvd. South, Suite 300, Las Vegas, Nevada 89119. I am authorized to make this declaration on SLF’s behalf and unless otherwise indicated, I have personal knowledge of the facts set forth herein.

2. I am counsel for the above-captioned debtors (the “Debtors”) and make this declaration in support of their motion to close their Chapter 11 bankruptcy cases.

3. As counsel for the Debtors, we reviewed the Debtors’ plan, scheduled claims and proofs of claims filed in the Debtors bankruptcy cases. After reviewing such claims and

1 corresponding with Mr. Carlos A. Huerta regarding the remaining claims to be paid in full, Mr.
2 Huerta issued a wire transfer to my office in the amount of \$118,658.67.

3
4 4. My office, in turn, drafted a cover letter to each creditor, and issued via regular
5 mail checks to pay 100% of the allowed claims of all remaining creditors under the Debtor's
6 Chapter 11 plan of reorganization.
7

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
9 and correct.
10

11 Dated this 22nd day of February, 2016.

12 /s/ Samuel A. Schwartz
13 SAMUEL A. SCHWARTZ, ESQ.
14 Nevada Bar No. 10985
15 Attorneys for the Debtors
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EXHIBIT B

Samuel A. Schwartz, Esq.
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Bryan A. Lindsey, Esq.
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Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	Joint Administration Under
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Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	
Debtors.)	
)	

DECLARATION OF CARLOS A. HUERTA

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CARLOS HUERTA, being duly sworn, deposes and says:

1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I have personal knowledge of the facts set forth herein. I am the principal of Go Global, Inc. (“Go Global”), and an individual debtor (collectively, the “Debtors”) in the foregoing bankruptcy cases. I make this declaration in support of the above-captioned Debtors’ motion to close their Chapter 11 cases.

2. In early February 2016, I caused payment to be made to several of the Debtors' creditors, which paid such creditors 100% of their allowed claims under the Debtors' Chapter 11 plan of reorganization, including, but not limited to, the stipulated allowed claim of Nevada State Bank in the amount of \$478,901.86.

3. On February 9, 2016, I caused a wire in the amount of \$118,658.67 to be sent to my bankruptcy counsel, who in turn, used such funds to pay 100% of all remaining allowed claims under the Debtor's plan.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 22nd day of February, 2016.


CARLOS HUERTA

Samuel A. Schwartz, Esq.
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Bryan A. Lindsey, Esq.
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Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	Hearing Date: March 29, 2016
Debtors.)	Hearing Time: 9:30 a.m.
)	

NOTICE OF (a) HEARING ON MOTION TO CLOSE THE GO GLOBAL, INC. AND CARLOS A. HUERTA AND CHRISTINE H. HUERTA CASES PURSUANT TO 11 U.S.C. § 350, RULE 3022 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3022 OF THE LOCAL RULES OF BANKRUPTCY PRACTICE OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA AND (b) COMSUMMATION OF THE PLAN AND PAYMENT OF UNSECURED CREDITORS IN FULL

TO: ALL INTERESTED PARTIES, CREDITORS AND TRUSTEES

The Court, the Debtors, all creditors in receipt of electronic notice and parties in interest are hereby notified of a hearing on Go Global, Inc. and Carlos A. Huerta and Christine H. Huerta's (collectively, the "**Debtors**") Motion seeking to close their bankruptcy cases pursuant to section 350 the Bankruptcy Code, Rule 3022 of the Federal Rules of Bankruptcy Procedure and Rule 3022 of the Local Rules of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada

1 and that their Cases be closed pursuant to a final decree (the “**Motion**”), filed in this case on
2 February 22, 2016.

3 Take further notice that on February 10, 2016, the Debtors paid all unsecured creditors in full
4 in accordance with the terms of their Third Amended Chapter 11 Plan of Reorganization.

5 Take further notice that any party who objects to the Motion must file a written objection
6 pursuant to Local Rule 9014(d):
7

8
9 Oppositions to a motion must be filed and service of the opposition must
10 be completed on the movant no later than fourteen (14) days preceding
11 the hearing date for the motion. The opposition must set forth all
12 relevant facts and any relevant legal authority. An opposition must be
13 supported by affidavits or declarations that conform to the provisions of
14 subsection (c) of this rule.

15 If an objection is not timely filed and served, an order for the aforementioned Motion and
16 request for relief may be granted. LR 9014(a)(1).

17 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with
18 the court. You *must* also serve your written response on the undersigned attorneys who sent you this
19 notice.
20

21 If you do not file a written response with the court, or if you do not serve your written response
22 as set forth herein, then:
23

- 24 1. The court may *refuse to allow you to speak* at the scheduled hearing; and
25 2. The court may *rule against you* without formally calling the matter at the hearing.
26

27 WHEREFORE, notice is further given that the hearing on the Motion will be held before the
28 Honorable United States Bankruptcy Judge Laurel E. Davis, in the Foley Federal Building, 300 Las
29 Vegas Boulevard South, Las Vegas, NV 89101 in Courtroom #3, on **March 29, 2016, at 9:30 a.m.**
30

31 ///

32 ///

1 Dated: February 22, 2016.

2 Respectfully Submitted,

3 /s/Samuel A. Schwartz

4 Samuel A. Schwartz, Esq.

5 Nevada Bar No. 10985

6 Bryan A. Lindsey, Esq.

7 Nevada Bar No. 10662

8 The Schwartz Law Firm, Inc.

9 6623 Las Vegas Blvd. South, Suite 300

10 Las Vegas, Nevada 89101

11 Telephone: (702) 385-5544

12 Facsimile: (702) 385-2741

13 Attorneys for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF System on February 22, 2016, to the following:

MICHAEL W. CHEN on behalf of Creditor CHASE HOME FINANCE, LLC F/K/A CHASE MANHATTAN MORTGAGE CORPORATION F/K/A CHASE MORTGAGE COMPANY
bknotice@mccarthyholthus.com,
mchen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

MICHAEL W. CHEN on behalf of Creditor CHASE MORTGAGE COMPANY/ CHASE HOME FINANCE LLC
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mchen@ecf.courtdrive.com;nvbkcourt@mccarthyholthus.com;mchen@mccarthyholthus.com

FRANK A ELLIS, III on behalf of Respondent MT. CHARLESTON INVESTMENTS, LLC
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RANDOLPH L. HOWARD on behalf of Special Counsel KOLESAR & LEATHAM, CHTD.
rhoward@klnevada.com,
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17 nvbk@tblaw.com, gwaring@tblaw.com;llcano@tblaw.com;maerwin@tblaw.com

18 BRENOCH R WIRTHLIN on behalf of Defendant SIG ROGICH
19 bwirthli@fclaw.com, aharris@fclaw.com

20 I HEREBY CERTIFY that in accordance with the Confirmation Order in this case (See
21
22 Docket No. 507) a true and correct copy of the foregoing was sent via U.S. REGULAR MAIL on
23 February 22, 2016, to the following:

24 United States Trustee
25 300 Las Vegas Blvd. South #4300
26 Las Vegas, NV 89101

27 /s/ Christy L. Cahall
28 Christy L. Cahall
29
30
31
32
33
34

EXHIBIT C

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	
Debtors.)	
)	

DECLARATION OF SAMUEL A. SCHWARTZ, ESQ.

SAMUEL A. SCHWARTZ, ESQ., being duly sworn, deposes and says:

1. I am the principal of The Schwartz Law Firm, Inc. (“SLF” or the “Firm”), 6623 Las Vegas Blvd. South, Suite 300, Las Vegas, Nevada 89119. I am authorized to make this declaration on SLF’s behalf and unless otherwise indicated, I have personal knowledge of the facts set forth herein.

2. I am counsel for the above-captioned debtors (the “Debtors”) and make this declaration in support of their motion to close their Chapter 11 bankruptcy cases.

3. As counsel for the Debtors, we reviewed the Debtors’ plan, scheduled claims and proofs of claims filed in the Debtors bankruptcy cases. After reviewing such claims and

1 corresponding with Mr. Carlos A. Huerta regarding the remaining claims to be paid in full, Mr.
2 Huerta issued a wire transfer to my office in the amount of \$118,658.67.

3
4 4. My office, in turn, drafted a cover letter to each creditor, and issued via regular
5 mail checks to pay 100% of the allowed claims of all remaining creditors under the Debtor's
6 Chapter 11 plan of reorganization.

7
8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
9 and correct.

10
11 Dated this 22nd day of February, 2016.

12 /s/ Samuel A. Schwartz
13 SAMUEL A. SCHWARTZ, ESQ.
14 Nevada Bar No. 10985
15 Attorneys for the Debtors
16
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EXHIBIT D

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
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Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	Joint Administration Under
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Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	
Debtors.)	
)	

DECLARATION OF CARLOS A. HUERTA

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CARLOS HUERTA, being duly sworn, deposes and says:

1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I have personal knowledge of the facts set forth herein. I am the principal of Go Global, Inc. (“Go Global”), and an individual debtor (collectively, the “Debtors”) in the foregoing bankruptcy cases. I make this declaration in support of the above-captioned Debtors’ motion to close their Chapter 11 cases.

2. In early February 2016, I caused payment to be made to several of the Debtors' creditors, which paid such creditors 100% of their allowed claims under the Debtors' Chapter 11 plan of reorganization, including, but not limited to, the stipulated allowed claim of Nevada State Bank in the amount of \$478,901.86.

3. On February 9, 2016, I caused a wire in the amount of \$118,658.67 to be sent to my bankruptcy counsel, who in turn, used such funds to pay 100% of all remaining allowed claims under the Debtor's plan.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 22nd day of February, 2016.

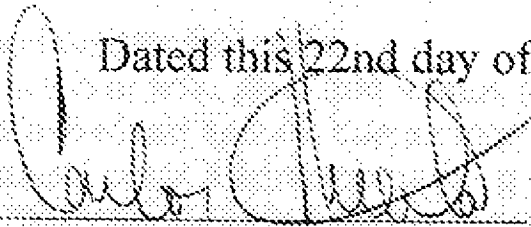

CARLOS HUERTA

EXHIBIT E

IN THE SUPREME COURT OF THE STATE OF NEVADA

NANYAH VEGAS, LLC, A NEVADA
LIMITED LIABILITY COMPANY,
Appellant,
vs.
SIG ROGICH A/K/A SIGMUND
ROGICH AS TRUSTEE OF THE
ROGICH FAMILY IRREVOCABLE
TRUST; AND ELDORADO HILLS, LLC,
A NEVADA LIMITED LIABILITY
COMPANY,
Respondents.

No. 66823

FILED

FEB 12 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
CHIEF DEPUTY CLERK

ORDER OF REVERSAL AND REMAND

This is an appeal from a district court final judgment in a contract action. Eighth Judicial District Court, Clark County; Nancy L. Alf, Judge.

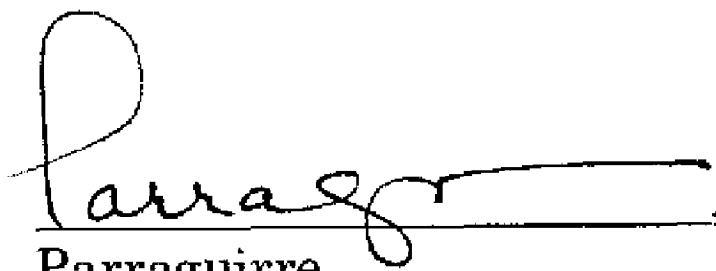
Appellant argues that the district court erred by granting summary judgment in favor of respondent Eldorado Hills, LLC, based on a finding that appellant's unjust enrichment claim was time-barred under the four-year statute of limitations. According to appellant, the statute of limitations did not begin to run until appellant became aware that it would not be repaid and that it owned no interest in Eldorado Hills. Having considered the parties' arguments and appendices, we conclude that the district court erred in granting summary judgment on statute-of-limitations grounds. *Wood v. Safeway, Inc.*, 121 Nev. 724, 729, 121 P.3d 1026, 1029 (2005) (holding that this court reviews summary judgments de novo and that summary judgment is only appropriate if the pleadings and


other evidence on file, viewed in the light most favorable to the nonmoving party, demonstrate that no genuine issue of material fact remains in dispute and that the moving party is entitled to judgment as a matter of law); *Oak Grove Inv'rs v. Bell & Gossett Co.*, 99 Nev. 616, 623, 668 P.2d 1075, 1079 (1983) (placing the burden of demonstrating the absence of a genuine issue of material fact as to when a party discovered or should have discovered the facts underlying a claim on the party seeking summary judgment on statute-of-limitations grounds), *disapproved on other grounds by Calloway v. City of Reno*, 116 Nev. 250, 993 P.2d 1259 (2000).

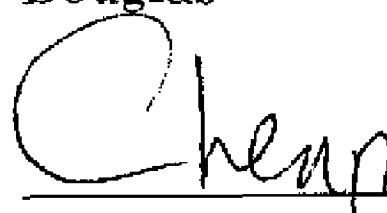
Appellant's claim for unjust enrichment did not accrue until Eldorado Hills retained \$1.5 million under circumstances where it was inequitable for Eldorado Hills to do so. *See Certified Fire Prot. Inc. v. Precision Constr.*, 128 Nev., Adv. Op. 35, 283 P.3d 250, 257 (2012) ("Unjust enrichment exists when the plaintiff confers a benefit on the defendant, the defendant appreciates such benefit, and there is acceptance and retention by the defendant of such benefit under circumstances such that it would be inequitable for him to retain the benefit without payment of the value thereof"). As Eldorado Hills failed to demonstrate that no genuine issues of material fact remain regarding whether the limitations period on appellant's unjust enrichment claim commenced when Eldorado Hills received the \$1.5 million or at a later date when Eldorado Hills allegedly failed to issue a membership interest to appellant or to repay the money as a loan, the district court erred in granting summary judgment based on the expiration of the statute of limitation. *Oak Grove Inv'rs*, 99 Nev. at 623, 668 P.2d at 1079; *see* NRS 11.190(2)(c) (setting a four year

statute of limitation for "[a]n action upon a contract, obligation or liability not founded upon an instrument in writing"). Accordingly, we

ORDER the judgment of the district court REVERSED AND REMAND this matter to the district court for proceedings consistent with this order.

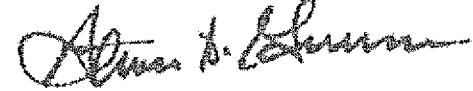
 C.J.
Parraguirre

 J.
Douglas

 J.
Cherry

cc: Hon. Nancy L. Allf, District Judge
Ara H. Shirinian, Settlement Judge
McDonald Law Offices, PLLC
Fennemore Craig Jones Vargas/Las Vegas
Eighth District Court Clerk

EXHIBIT F



CLERK OF THE COURT

TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA

CARLOS HUERTA,

Plaintiffs,

vs.

ELDORADO HILLS LLC,

Defendants.

CASE NO. A686303

DEPT. NO. XXVII

BEFORE THE HONORABLE NANCY ALLF, DISTRICT COURT JUDGE

WEDNESDAY, OCTOBER 8, 2014

RECORDER'S PARTIAL TRANSCRIPT OF PROCEEDINGS:

DEFENDANT SIG ROGICH, TRUSTEE OF THE ROGICH FAMILY
IRREVOCABLE TRUST'S MOTION FOR PARTIAL SUMMARY JUDGMENT
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR PARTIAL
SUMMARY JUDGEMENT AND COUNTER-MOTION FOR PARTIAL SUMMARY
JUDGMENT

PLAINTIFFS' MOTION TO CONTINUE TRIAL ON ORDER SHORTENING TIME

RULING

APPEARANCES:

For the Plaintiffs:

BRANDON B. MCDONALD, ESQ.
SAMUEL A. SCHWARTZ, ESQ.

For the Defendants:

SAMUEL S. LIONEL, ESQ.

RECORDED BY: SANDRA PRUCHNIC, COURT RECORDER

1 LAS VEGAS, NEVADA, WEDNESDAY, OCTOBER 8, 2014, 10:53 A.M.

2 [PORTION OF PROCEEDINGS BEGAN AT 11:28 A.M.]

3 * * * * *

4 THE COURT: The matter is under the submission. This is a really long
5 ruling but I'd like to do it orally simply because I think I'm prepared well enough to
6 do that without taking the time and delay of doing this in writing for you. I am going
7 to grant the motion for the following reasons: the -- and I'm sorry, forgive me. I
8 assume this case will go up so I'm going to kind of do a bankruptcy tutorial with it.
9 In Chapter 7 people declare what their assets are and then they get a discharge of
10 debt. When they don't declare their assets the courts cut them off from going later
11 to go collect their assets and case law is really clear, that's the *Hamilton* case as
12 well as the *Henderson* case. But in Chapter 11 it's a little different because you
13 declare your assets and then you tell creditors through a disclosure statement how
14 you will use those assets to pay creditors.

15 And here are the salient dates in this case: a bankruptcy was filed on
16 or about March 23 of 2010 by Go Global and on June 4 of 2010 it admits that it has
17 a receivable. I do find that the listing of the receivable from Sig Rogich is sufficient
18 to establish they have told their creditors that they have this receivable but it's after
19 that that the problem begins to me. In the first disclosure statement filed on April 4
20 of 2011 it talks about avoidance of transfer; it mentions Paulson but never this
21 transaction. When it talks about payments to creditors it's only from sale of assets.
22 This receivable is never identified; litigation is never identified. There's no recovery
23 of what might still at that point be a fraudulent transfer. And in page 18 of the first
24 disclosure statement the liquidation analysis identifying assets only lists real estate
25 and no receivables.

1 Now after that while the disclosure statement is pending the Plaintiff
2 makes a demand for payment on November 7 of 2012. So at that point this Plaintiff
3 is charged with the knowledge that it knows it has a receivable but yet when it
4 comes back on January 17 of 2013 with the first amended disclosure statement, it's
5 the same thing again: payment to creditor by sale of assets, no identification of a
6 receivable, no identification of litigation. And the same -- Exhibit C, liquidation
7 analysis lists only real estate and no receivables. The second disclosure
8 statement, March 8 of 2013, same thing; no liquidation analysis identifying this so
9 that creditors are never being told that this may be an asset that may be collected.
10 We have the third amended disclosure statement on April 8 of 2013, again the
11 disclosure statement, the liquidation analysis, income expenses, real estate only. It
12 never lists the receivable or cause of action.

13 And the reason that it matters is that in the Chapter 11 process you
14 have the listing of the assets then you have a disclosure statement that tells
15 creditors how they will get paid and then the plan really just says how much they'll
16 get paid and when. It's that disclosure statement that's operative and what the
17 creditors use to vote whether or not to accept the plan. They were never told that
18 there was a receivable to be collected. And the thing that really concerns me the
19 most is that when the plan is confirmed on July 22 of 2013 with the affidavit of
20 Mr. Huerta saying that everything in the plan and disclosure statement is true and
21 accurate, eight days later Go Global assigns the receivable and sues somewhere
22 else under a different name; it evidences no intention that the creditors of Go Global
23 would ever, ever have benefited from this transaction. This is a case that's very
24 ripe for judicial estoppel and under the applicable case law the motion is granted.
25 So Mr. Lionel to prepare the order.

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Mr. Schwartz I assume you want to sign off on that.

MR. SCHWARTZ: Yes please, Your Honor.

MR. LIONEL: Yes, certainly.

THE COURT: You can incorporate the findings by reference. It can be a simple order.

MR. LIONEL: Yes, Your Honor.


THE COURT: Very good. And if there's any question about the order guys let me know and we'll do a telephonic on the language.

MR. LIONEL: Yes, Your Honor.

THE COURT: Thank you both. Court will be in recess.

PROCEEDING CONCLUDED AT 11:32 A.M.

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio-video recording of this proceeding in the above-entitled case.



TRACI RAWLINSON
Court Recorder/Transcriber

Exhibit I


CLERK OF THE COURT

TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA

CARLOS HUERTA,

Plaintiffs,

vs.

ELDORADO HILLS LLC,

Defendants.

CASE NO. A686303

DEPT. NO. XXVII

BEFORE THE HONORABLE NANCY ALLF, DISTRICT COURT JUDGE

WEDNESDAY, OCTOBER 8, 2014

RECORDER'S PARTIAL TRANSCRIPT OF PROCEEDINGS:

DEFENDANT SIG ROGICH, TRUSTEE OF THE ROGICH FAMILY
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SUMMARY JUDGEMENT AND COUNTER-MOTION FOR PARTIAL SUMMARY
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PLAINTIFFS' MOTION TO CONTINUE TRIAL ON ORDER SHORTENING TIME

RULING

APPEARANCES:

For the Plaintiffs:

BRANDON B. MCDONALD, ESQ.
SAMUEL A. SCHWARTZ, ESQ.

For the Defendants:

SAMUEL S. LIONEL, ESQ.

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25 So Mr. Lionel to prepare the order.

1 Mr. Schwartz I assume you want to sign off on that.

2 MR. SCHWARTZ: Yes please, Your Honor.

3 MR. LIONEL: Yes, certainly.

4 THE COURT: You can incorporate the findings by reference. It can be a
5 simple order.

6 MR. LIONEL: Yes, Your Honor.

7 THE COURT: Very good. And if there's any question about the order guys
8 let me know and we'll do a telephonic on the language.

9 MR. LIONEL: Yes, Your Honor.

10 THE COURT: Thank you both. Court will be in recess.

11 PROCEEDING CONCLUDED AT 11:32 A.M.

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19 ATTEST: I do hereby certify that I have truly and correctly transcribed the audio-
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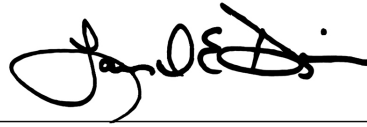
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Traci Rawlinson
TRACI RAWLINSON
Court Recorder/Transcriber

Exhibit H



Honorable Laurel E. Davis
United States Bankruptcy Judge



Entered on Docket
March 30, 2016

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	Hearing Date: March 29, 2016
Debtors.)	Hearing Time: 9:30 a.m.
)	

ORDER ADMINISTRATIVELY CLOSING THE GO GLOBAL, INC. AND CARLOS A. HUERTA AND CHRISTINE H. HUERTA CHAPTER 11 CASES PURSUANT TO 11 U.S.C. § 350, RULE 3022 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE 3022 OF THE LOCAL RULES OF BANKRUPTCY PRACTICE OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

Upon consideration of the Motion (the “**Motion**”) of Go Global, Inc. and Carlos A. Huerta and Christine H. Huerta (collectively, the “**Debtors**”), seeking entry of an order pursuant to section 350 of 11 U.S.C. §§ 101, *et seq.*, Rule 3022 of the Federal Rules of Bankruptcy Procedure and Rule 3022 of the Local Rules of Bankruptcy Practice of the United States District

1 Court for the District of Nevada closing the Debtors' jointly administered Chapter 11 Cases; and
2 it appearing that this Court has jurisdiction to consider this Motion and the relief requested
3 therein in accordance with 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core
4 proceeding within the meaning of 28 U.S.C. § 157(b); and it appearing that venue of this
5 proceeding and this Motion is proper in this district in accordance with 28 U.S.C. §§ 1408 and
6 1409; and due and proper notice of the Motion having been given; and it appearing that no other
7 further notice is necessary; and the Court finding that the Debtors made all payments in
8 accordance with their Chapter 11 Plan and paid their creditors in full; and the Court finding that
9 the relief requested in the Motion is appropriate and a benefit to the Debtors' estates, it is hereby,
10

11 **ORDERED** that the Motion is **GRANTED**; and it is further
12

13 **ORDERED** that the Debtors' jointly administered chapter 11 cases are hereby
14 administratively CLOSED, without prejudice to the rights of the Debtors or any other party in
15 interest to seek to reopen such case for good cause shown; and it is further
16

17 **ORDERED** that this Court shall retain jurisdiction over any and all matters arising from
18 or related to the implementation or interpretation of this Order.

19 Submitted by:

20 THE SCHWARTZ LAW FIRM, INC.

21 By: /s/ Samuel A. Schwartz, Esq.
22 Samuel A. Schwartz, Esq., NBN 10985
23 6623 Las Vegas Blvd. South, Suite 300
24 Las Vegas, NV 89119
25 Attorneys for the Debtors
26
27
28

SUBMISSION TO COUNSEL FOR APPROVAL PURSUANT TO LR 9021

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

_____ The court has waived the requirement set forth in LR 9021(b)(1).

 X No party appeared at the hearing or filed an objection to the motion.

_____ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

_____ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of this order.

APPROVED:

DISAPPROVED:

FAILED TO RESPOND:

Submitted by:

THE SCHWARTZ LAW FIRM, INC.

By: /s/ Samuel A. Schwartz
Samuel A. Schwartz, Esq., NBN 10985
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Attorneys for the Debtors

###

Exhibit G

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	Joint Administration Under
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Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	
Debtors.)	
)	

DECLARATION OF CARLOS A. HUERTA

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CARLOS HUERTA, being duly sworn, deposes and says:

1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I have personal knowledge of the facts set forth herein. I am the principal of Go Global, Inc. (“Go Global”), and an individual debtor (collectively, the “Debtors”) in the foregoing bankruptcy cases. I make this declaration in support of the above-captioned Debtors’ motion to close their Chapter 11 cases.

2. In early February 2016, I caused payment to be made to several of the Debtors' creditors, which paid such creditors 100% of their allowed claims under the Debtors' Chapter 11 plan of reorganization, including, but not limited to, the stipulated allowed claim of Nevada State Bank in the amount of \$478,901.86.

3. On February 9, 2016, I caused a wire in the amount of \$118,658.67 to be sent to my bankruptcy counsel, who in turn, used such funds to pay 100% of all remaining allowed claims under the Debtor's plan.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 22nd day of February, 2016.

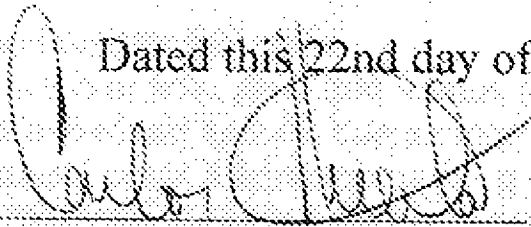

CARLOS HUERTA

Exhibit F

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, NV 89119
Telephone: (702) 385-5544
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Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT

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Go Global, Inc.,)	CASE NO.: 10-14804-LED
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Carlos A. Huerta, and)	
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DECLARATION OF SAMUEL A. SCHWARTZ, ESQ.

SAMUEL A. SCHWARTZ, ESQ., being duly sworn, deposes and says:

1. I am the principal of The Schwartz Law Firm, Inc. (“SLF” or the “Firm”), 6623 Las Vegas Blvd. South, Suite 300, Las Vegas, Nevada 89119. I am authorized to make this declaration on SLF’s behalf and unless otherwise indicated, I have personal knowledge of the facts set forth herein.

2. I am counsel for the above-captioned debtors (the “Debtors”) and make this declaration in support of their motion to close their Chapter 11 bankruptcy cases.

3. As counsel for the Debtors, we reviewed the Debtors’ plan, scheduled claims and proofs of claims filed in the Debtors bankruptcy cases. After reviewing such claims and

1 corresponding with Mr. Carlos A. Huerta regarding the remaining claims to be paid in full, Mr.
2 Huerta issued a wire transfer to my office in the amount of \$118,658.67.

3
4 4. My office, in turn, drafted a cover letter to each creditor, and issued via regular
5 mail checks to pay 100% of the allowed claims of all remaining creditors under the Debtor's
6 Chapter 11 plan of reorganization.
7

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
9 and correct.
10

11 Dated this 22nd day of February, 2016.

12 /s/ Samuel A. Schwartz
13 SAMUEL A. SCHWARTZ, ESQ.
14 Nevada Bar No. 10985
15 Attorneys for the Debtors
16
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19
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21
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27
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31
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33
34

Exhibit E

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Attorneys for the Debtors

E-Filed: February 22, 2016

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	Hearing Date: March 29, 2016
Debtors.)	Hearing Time: 9:30 a.m.
)	

**MOTION TO CLOSE THE GO GLOBAL, INC. AND CARLOS A. HUERTA
AND CHRISTINE H. HUERTA CASES PURSUANT TO 11 U.S.C. § 350, RULE
3022 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND RULE
3022 OF THE LOCAL RULES OF BANKRUPTCY PRACTICE OF THE UNITED
STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

Go Global, Inc. (“**Go Global**”) and Carlos A. Huerta and Christine H. Huerta (“**Huerta**”) (Go Global and Huerta are collectively referred to as “**Debtors**”), by and through their attorneys of record, The Schwartz Law Firm, Inc., file this motion (the “**Motion**”) seeking to close their bankruptcy cases (the “**Cases**”) pursuant to section 350 the Bankruptcy Code, Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 3022 of the Local Rules of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada (the “**Local Rules**”) and that their Cases be closed pursuant to a final decree. In support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1
2 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157
3 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before
4 this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

5
6 **PROCEDURAL AND FACTUAL BACKGROUND**

7 2. The Bankruptcy Case. On May 11, 2010 and May 23, 2010, Huerta and Go
8 Global retained the Schwartz Law Firm, Inc. (“SLF”) as bankruptcy counsel, respectively. On
9 March 18, 2010, Huerta filed a voluntary petition for relief under chapter 11 of the Bankruptcy
10 Code. On March 23, 2010, Go Global filed a voluntary petition for relief under chapter 11 of
11 the Bankruptcy Code.

12 3. On April 5, 2010, this Court entered an order jointly administering the Go
13 Global, Inc. case (10-14804) and the Carlos and Christine Huerta (10-14456) case. See Docket
14 No. 35. The Debtors continue to operate their business and manage their properties as debtors-
15 in-possession.
16

17 4. The Plan and Disclosure Statement. On April 4, 2011, debtors Go Global, Inc.
18 and Carlos and Christine Huerta filed their Joint Plan of Reorganization and Joint Disclosure
19 Statement. On January 17, 2013, the Debtors filed their First Amended Joint Plan of
20 Reorganization and First Amended Joint Disclosure Statement. On March 08, 2013, the
21 Debtors filed their Second Amended Joint Plan of Reorganization and Second Amended
22 Disclosure Statement. On March 28, 2013, the Debtors filed their Third Amended Joint Plan of
23 Reorganization (the “**Plan**”)¹ and Third Amended Joint Disclosure Statement (the “**Disclosure**
24 **Statement**”). By order dated April 8, 2013, this Court entered an order approving the
25
26

27

1 Capitalized terms used herein but not defined herein shall have the meanings ascribed to such terms in the Plan.

1 Disclosure Statement and solicitation of the acceptance of the Plan commenced on April 8,
2 2013.

3 5. The Plan allowed for the Debtors to reorganize their properties and business
4 affairs.

5 6. The Effective Date. On June 19, 2013, this Court confirmed the Plan at the
6 confirmation hearing. On July 22, 2013, this Court entered an order (the “**Confirmation**
7 **Order**”) confirming the Plan. The Plan became effective on October 6, 2014 (the “**Effective**
8 **Date**”).
9

10 7. On April 8, 2014, this Court entered a Discharge of Individual Debtor in a
11 Chapter 11 Case relative to Carlos A. Huerta and Christine H, Huerta. See Docket No. 169.

12 8. On February 10, 2016, all allowed unsecured claims pursuant to the Debtors’
13 Plan were paid in full. See Declarations of Samuel A. Schwartz and Carlos A. Huerta, attached
14 hereto as **Exhibits A and B**, respectively. All secured claims are being treated as set forth in
15 the Plan and in accordance with their respective loan agreements.
16

17 9. Statutory Fees. In accordance with Section 3.04 of the Plan, all fees payable
18 pursuant to section 1930 of title 28 of the United States Code (the “**Trustees’ Fees**”), as
19 determined by the Bankruptcy Court at the hearing on the Plan, were paid by the Debtors on or
20 before the Effective Date. The Trustees’ Fees continue to be paid to the Office of the United
21 States Trustee (“UST”) and upon information and belief, the Debtors are current with their
22 Trustees’ Fees.
23

24
25 **RELIEF REQUESTED**
26
27

1 (Bankr. E.D.N.Y. 1999); In re JMP-Newcor Int'l, 225 B.R. 462, 465 (Bankr. N.D. Ill. 1998).
2 Rather, the six factors act as mere guidelines to aid a court in its determination. See In re Mold
3 Makers, Inc., 124 B.R. 766, 768-69 (Bankr. N.D. Ill. 1990). Such a fluid formula has produced
4 widely varying results. “At one extreme, an estate could be fully administered, when a Chapter
5 11 Plan is confirmed and the estate dissolved... [a]t the other extreme, an estate could be fully
6 administered when all that is called for under a plan occurs.” Id. at 768.
7

8 5. Finally, Rule 3022 of the Local Rules states that “[u]nless otherwise provided in
9 the plan or by court order, or unless there are pending contested matters or adversary
10 proceedings, a case is deemed fully administered 180 days after plan confirmation, and the
11 clerk may then enter a final decree without further notice.” LR 3022.

12 6. In this case, a final decree, as requested herein, is appropriate in the Closing
13 Debtors’ Chapter 11 cases. The Confirmation Order is final and non-appealable. The Plan has
14 been substantially consummated. Moreover, all pending motions are resolved, and there are no
15 pending motions, contested matters or adversary proceedings at this time. Furthermore, the
16 Debtors’ Chapter 11 cases were confirmed on July 22, 2013, more than 180 days ago.
17 Accordingly, the rights of creditors will not be adversely affected by the close of the Debtors’
18 Chapter 11 cases.
19

20 7. Finally, the Closing Debtors are nonetheless incurring Trustees’ Fees and will
21 continue to incur such fees until their cases are closed. Absent an order closing the Debtors’
22 cases, the Closing Debtors will be forced to incur the substantial and ongoing burden of paying
23 quarterly fees to the UST, despite having made all distributions under the Plan and having their
24 cases being fully administered. Entry of the final decree requested herein will avoid the
25 considerable administrative costs and expense associated with maintaining the Closing
26 Debtors’ Chapter 11 cases.
27

CONCLUSION

8. WHEREFORE, based on the foregoing, the Debtors respectfully request that the Court: (i) enter an order closing the Chapter 11 cases of Go Global, Inc. (Case No. 10-14804-LED) and Carlos A. Huerta and Christine H. Huerta (Case No. 10-14456-LED), and to the extent necessary under Rule 9006, the Final Decree be effective when the deadlines required by LR 3022.1 have passed, and (ii) any other relief that is necessary and proper.

Dated: February 22, 2016.

Respectfully submitted,

/s/ Samuel A. Schwartz Esq.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF System on February 22, 2016, to the following:

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16 I HEREBY CERTIFY that in accordance with the Confirmation Order in this case (See
17 Docket No. 507) a true and correct copy of the foregoing was sent via U.S. REGULAR MAIL on
18 February 22, 2016, to the following:

19 United States Trustee
20 300 Las Vegas Blvd. South #4300
21 Las Vegas, NV 89101

22 /s/ Christy L. Cahall
23 Christy L. Cahall
24
25
26
27

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Attorneys for the Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	Joint Administration Under
)	
Go Global, Inc.,)	CASE NO.: 10-14804-LED
Debtor,)	
)	CASE NO.: 10-14804-LED
In re:)	CASE NO.: 10-14456-LED
Carlos A. Huerta, and)	
Christine H. Huerta,)	Hearing Date: March 29, 2016
Debtors.)	Hearing Time: 9:30 a.m.
)	

**NOTICE OF (a) HEARING ON MOTION TO CLOSE THE GO GLOBAL,
INC. AND CARLOS A. HUERTA AND CHRISTINE H. HUERTA CASES
PURSUANT TO 11 U.S.C. § 350, RULE 3022 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE AND RULE 3022 OF THE LOCAL RULES
OF BANKRUPTCY PRACTICE OF THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEVADA AND (b) COMSUMMATION
OF THE PLAN AND PAYMENT OF UNSECURED CREDITORS IN FULL**

TO: ALL INTERESTED PARTIES, CREDITORS AND TRUSTEES

The Court, the Debtors, all creditors in receipt of electronic notice and parties in interest are hereby notified of a hearing on Go Global, Inc. and Carlos A. Huerta and Christine H. Huerta's (collectively, the "**Debtors**") Motion seeking to close their bankruptcy cases pursuant to section 350 the Bankruptcy Code, Rule 3022 of the Federal Rules of Bankruptcy Procedure and Rule 3022 of the Local Rules of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada

1 and that their Cases be closed pursuant to a final decree (the “**Motion**”), filed in this case on
2 February 22, 2016.

3 Take further notice that on February 10, 2016, the Debtors paid all unsecured creditors in full
4 in accordance with the terms of their Third Amended Chapter 11 Plan of Reorganization.

5 Take further notice that any party who objects to the Motion must file a written objection
6 pursuant to Local Rule 9014(d):
7

8
9 Oppositions to a motion must be filed and service of the opposition must
10 be completed on the movant no later than fourteen (14) days preceding
11 the hearing date for the motion. The opposition must set forth all
12 relevant facts and any relevant legal authority. An opposition must be
13 supported by affidavits or declarations that conform to the provisions of
14 subsection (c) of this rule.

15 If an objection is not timely filed and served, an order for the aforementioned Motion and
16 request for relief may be granted. LR 9014(a)(1).

17 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with
18 the court. You *must* also serve your written response on the undersigned attorneys who sent you this
19 notice.
20

21 If you do not file a written response with the court, or if you do not serve your written response
22 as set forth herein, then:
23

- 24 1. The court may *refuse to allow you to speak* at the scheduled hearing; and
25 2. The court may *rule against you* without formally calling the matter at the hearing.
26

27 WHEREFORE, notice is further given that the hearing on the Motion will be held before the
28 Honorable United States Bankruptcy Judge Laurel E. Davis, in the Foley Federal Building, 300 Las
29 Vegas Boulevard South, Las Vegas, NV 89101 in Courtroom #3, on **March 29, 2016, at 9:30 a.m.**
30

31 ///

32 ///

1 Dated: February 22, 2016.

2 Respectfully Submitted,

3 /s/Samuel A. Schwartz

4 Samuel A. Schwartz, Esq.

5 Nevada Bar No. 10985

6 Bryan A. Lindsey, Esq.

7 Nevada Bar No. 10662

8 The Schwartz Law Firm, Inc.

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11 Telephone: (702) 385-5544

12 Facsimile: (702) 385-2741

13 Attorneys for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF System on February 22, 2016, to the following:

MICHAEL W. CHEN on behalf of Creditor CHASE HOME FINANCE, LLC F/K/A CHASE MANHATTAN MORTGAGE CORPORATION F/K/A CHASE MORTGAGE COMPANY
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MARK G SIMONS on behalf of Debtor GO GLOBAL, INC.

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MARK G SIMONS on behalf of Defendant CARLOS A. HUERTA

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Defendant CHRISTINA H. HUERTA

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Interested Party CHARLESTON FALLS, LLC

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Jnt Admin Debtor CHARLESTON FALLS, LLC

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Jnt Admin Debtor CARLOS A. HUERTA

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Jnt Admin Debtor CHRISTINA H. HUERTA

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Plaintiff GO GLOBAL, INC.

msimons@rbslattys.com, jalhasan@rbslattys.com

MARK G SIMONS on behalf of Plaintiff CARLOS A. HUERTA

msimons@rbslattys.com, jalhasan@rbslattys.com

JENNIFER A. SMITH on behalf of Counter-Claimant AZURE SEAS HOLDINGS, LLC

jennifer@jenniferasmith.com

JENNIFER A. SMITH on behalf of Counter-Claimant AZURE SEAS, LLC

jennifer@jenniferasmith.com

JENNIFER A. SMITH on behalf of Counter-Claimant HUGO R. PAULSON

jennifer@jenniferasmith.com

JENNIFER A. SMITH on behalf of Creditor HUGO PAULSON

jennifer@jenniferasmith.com

JENNIFER A. SMITH on behalf of Creditor HUGO R. PAULSON

jennifer@jenniferasmith.com

JENNIFER A. SMITH on behalf of Defendant AZURE SEAS HOLDINGS, LLC

jennifer@jenniferasmith.com

1 JENNIFER A. SMITH on behalf of Defendant AZURE SEAS, LLC
2 jennifer@jenniferasmith.com

3 JENNIFER A. SMITH on behalf of Defendant HUGO R. PAULSON
4 jennifer@jenniferasmith.com

5 JENNIFER A. SMITH on behalf of Interested Party CHARLES ANTHONY ORCHARD, LLC
6 jennifer@jenniferasmith.com

7 JENNIFER A. SMITH on behalf of Interested Party THE LODGE LLC
8 jennifer@jenniferasmith.com

9 JENNIFER A. SMITH on behalf of Interested Party YOUNGO, LLC
10 jennifer@jenniferasmith.com

11 JENNIFER A. SMITH on behalf of Plaintiff HUGO PAULSON
12 jennifer@jenniferasmith.com

13 JENNIFER A. SMITH on behalf of Plaintiff HUGO R. PAULSON
14 jennifer@jenniferasmith.com

15 NATHAN F. SMITH on behalf of Creditor Nationstar Mortgage LLC.
16 nathan@mclaw.org, MTeiman@mclaw.org

17 BRADLEY J. STEVENS on behalf of Creditor HUGO PAULSON
18 bstevens@jsslaw.com, lbourland@jsslaw.com

19 BRADLEY J. STEVENS on behalf of Creditor HUGO PAULSON
20 bstevens@jsslaw.com, lbourland@jsslaw.com

21 PHILLIP M. STONE on behalf of Counter-Claimant AZURE SEAS HOLDINGS, LLC
22 phillip@renostonelaw.com, annie@renostonelaw.com

23 PHILLIP M. STONE on behalf of Counter-Claimant AZURE SEAS, LLC
24 phillip@renostonelaw.com, annie@renostonelaw.com

25 PHILLIP M. STONE on behalf of Defendant AZURE SEAS HOLDINGS, LLC
26 phillip@renostonelaw.com, annie@renostonelaw.com

27 PHILLIP M. STONE on behalf of Defendant AZURE SEAS, LLC
28 phillip@renostonelaw.com, annie@renostonelaw.com

29 PHILLIP M. STONE on behalf of Defendant HUGO R. PAULSON
30 phillip@renostonelaw.com, annie@renostonelaw.com

1 PHILLIP M. STONE on behalf of Interested Party CHARLES ANTHONY ORCHARD, LLC
2 phillip@renostonelaw.com, annie@renostonelaw.com

3 PHILLIP M. STONE on behalf of Interested Party THE LODGE LLC
4 phillip@renostonelaw.com, annie@renostonelaw.com

5 PHILLIP M. STONE on behalf of Interested Party YOUNGO, LLC
6 phillip@renostonelaw.com, annie@renostonelaw.com

7 JEFFREY R. SYLVESTER on behalf of Creditor NEVADA STATE BANK
8 jeff@sylvesterpolednak.com, tina@sylvesterpolednak.com

9 JEFFREY R. SYLVESTER on behalf of Interested Party NEVADA STATE BANK
10 jeff@sylvesterpolednak.com, tina@sylvesterpolednak.com

11 TODD B TUGGLE on behalf of Creditor HUGO PAULSON
12 kagemusha2@yahoo.com

13 U.S. TRUSTEE - LV - 11, 11
14 USTPRegion17.lv.ecf@usdoj.gov

15
16 GREGORY L. WILDE on behalf of Creditor WELLS FARGO BANK, N.A.
17 nvbk@tblaw.com, gwaring@tblaw.com;llcano@tblaw.com;maerwin@tblaw.com

18 BRENOCH R WIRTHLIN on behalf of Defendant SIG ROGICH
19 bwirthli@fclaw.com, aharris@fclaw.com

20 I HEREBY CERTIFY that in accordance with the Confirmation Order in this case (See
21
22 Docket No. 507) a true and correct copy of the foregoing was sent via U.S. REGULAR MAIL on
23 February 22, 2016, to the following:

24 United States Trustee
25 300 Las Vegas Blvd. South #4300
26 Las Vegas, NV 89101

27 /s/ Christy L. Cahall
28 Christy L. Cahall
29
30
31
32
33
34

Exhibit D

E-filed on **January 19, 2012****Samuel A. Schwartz.****Esq.**

Name

10985

Bar Code #

6623 Las Vegas Blvd.**South, Suite 300****Las Vegas, NV 89119**

Address

(702) 385-5544

Phone Number

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**In re: **Go Global, Inc.**Case # **10-14804-BAM**Chapter **11**

Trustee

Debtor(s)**AMENDMENT COVER SHEET****Amendment(s) to the following are transmitted herewith. Check all that apply.**

- ☐ Petition (must be signed by debtor *and* attorney for debtor per Fed. R. Bankr. P. 9011)
- ☐ Summary of Schedules
- ☐ Schedule A - Real Property
- ☐ Schedule B - Personal Property
- ☐ Schedule C - Property Claimed as Exempt
- ☐ Schedule D, E, or F, and/or Matrix, and/or List of Creditors or Equity Holders
- ☐ Add/delete creditor(s), change amount or classification of debt - **\$30.00 fee required**
- ☐ Add/change address of already listed creditor, add name/address of attorney for already listed creditor, amend petition, attach new petition on converted case, supply missing document(s) - **no fee**

* Must provide diskette and comply with Local Rule 1007 if add/delete creditor or add/change address of already listed creditor

- ☐ Schedule G - Schedule of Executory Contracts & Unexpired Leases
- ☐ Schedule H - Codebtors
- ☐ Schedule I - Current Income of Individual Debtor(s)
- ☐ Schedule J - Current Expenditures of Individual Debtor(s)
- ☒ Statement of Financial Affairs

Declaration of Debtor**I (We) declare under penalty of perjury that the information set forth in the amendment(s) attached hereto is (are) true and correct to the best of my (our) information and belief.****/s/ Carlos A. Huerta****Carlos A. Huerta****Debtor's Signature****Date: January 19, 2012**

B7 (Official Form 7) (12/07)

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11**

STATEMENT OF FINANCIAL AFFAIRS - AMENDED

This statement is to be completed by every debtor. Spouses filing a joint petition may file a single statement on which the information for both spouses is combined. If the case is filed under chapter 12 or chapter 13, a married debtor must furnish information for both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed. An individual debtor engaged in business as a sole proprietor, partner, family farmer, or self-employed professional, should provide the information requested on this statement concerning all such activities as well as the individual's personal affairs. To indicate payments, transfers and the like to minor children, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. § 112; Fed. R. Bankr. P. 1007(m).

Questions 1 - 18 are to be completed by all debtors. Debtors that are or have been in business, as defined below, also must complete Questions 19 - 25. **If the answer to an applicable question is "None," mark the box labeled "None."** If additional space is needed for the answer to any question, use and attach a separate sheet properly identified with the case name, case number (if known), and the number of the question.

DEFINITIONS

"In business." A debtor is "in business" for the purpose of this form if the debtor is a corporation or partnership. An individual debtor is "in business" for the purpose of this form if the debtor is or has been, within six years immediately preceding the filing of this bankruptcy case, any of the following: an officer, director, managing executive, or owner of 5 percent or more of the voting or equity securities of a corporation; a partner, other than a limited partner, of a partnership; a sole proprietor or self-employed full-time or part-time. An individual debtor also may be "in business" for the purpose of this form if the debtor engages in a trade, business, or other activity, other than as an employee, to supplement income from the debtor's primary employment.

"Insider." The term "insider" includes but is not limited to: relatives of the debtor; general partners of the debtor and their relatives; corporations of which the debtor is an officer, director, or person in control; officers, directors, and any owner of 5 percent or more of the voting or equity securities of a corporate debtor and their relatives; affiliates of the debtor and insiders of such affiliates; any managing agent of the debtor. 11 U.S.C. § 101.

1. Income from employment or operation of business

None
☐

State the gross amount of income the debtor has received from employment, trade, or profession, or from operation of the debtor's business, including part-time activities either as an employee or in independent trade or business, from the beginning of this calendar year to the date this case was commenced. State also the gross amounts received during the **two years** immediately preceding this calendar year. (A debtor that maintains, or has maintained, financial records on the basis of a fiscal rather than a calendar year may report fiscal year income. Identify the beginning and ending dates of the debtor's fiscal year.) If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income of both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT
\$0.00
\$9,833.34
\$65,410.49

SOURCE
2010 YTD Income
2009 Income
2008 Income
AFLPA income = \$1,577.11;
Tomdan International, LLC income = \$4,833.34;
Go Global, Inc. income = \$59,000.04;

2. Income other than from employment or operation of business

None

☐

State the amount of income received by the debtor other than from employment, trade, profession, or operation of the debtor's business during the **two years** immediately preceding the commencement of this case. Give particulars. If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income for each spouse whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT
\$15,000.00

SOURCE
2008 - Mountain Gaming, LLC

3. Payments to creditors

None

☐

Complete a. or b., as appropriate, and c.

a. *Individual or joint debtor(s) with primarily consumer debts.* List all payments on loans, installment purchases of goods or services, and other debts to any creditor made within **90 days** immediately preceding the commencement of this case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$600. Indicate with an (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS	AMOUNT PAID	AMOUNT STILL OWING
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None

☐

b. *Debtor whose debts are not primarily consumer debts:* List each payment or other transfer to any creditor made within **90 days** immediately preceding the commencement of the case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$5,475. If the debtor is an individual, indicate with an asterisk (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS/ TRANSFERS	AMOUNT PAID OR VALUE OF TRANSFERS	AMOUNT STILL OWING
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	12/31/2009, 02/18/2010, 02/25/2010	\$15,000.00	\$654,000.00

None

☐

c. *All debtors:* List all payments made within **one year** immediately preceding the commencement of this case to or for the benefit of creditors who are or were insiders. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR AND RELATIONSHIP TO DEBTOR	DATE OF PAYMENT	AMOUNT PAID	AMOUNT STILL OWING
Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148	09/24/2009	\$50,000.00	\$3,800,000.00

4. Suits and administrative proceedings, executions, garnishments and attachments

None



a. List all suits and administrative proceedings to which the debtor is or was a party within **one year** immediately preceding the filing of this bankruptcy case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

CAPTION OF SUIT AND CASE NUMBER	NATURE OF PROCEEDING	COURT OR AGENCY AND LOCATION	STATUS OR DISPOSITION
Hugo R. Paulson, individually and as trustee of Hugo R. Paulson SEP IRA vs. Carlos Huerta, an individual; Go Global, Inc., a Nevada Corporation; Does 1 through 10; ROE Corporations 1 through 10 Case No.: CV0901910	Civil	Second Judicial District Court Washoe County, Nevada	Pending
Hugo R. Paulson as trustee of Hugo R. Paulson SEP IRA vs. Anthony Savino; Datasource, LLC, a Nevada limited liability company; Carlos Huerta, an individual; Go Global, Inc., a Nevada corporation; Does 1 through 10; ROE Corporations 1 through 10 Case No.: A9-604085-C - Conversion Case No.: A604085	Civil	District Court Clark County, Nevada	Pending
Go Global, Inc., A Nevada Corporation v John deVries, an individual; Gimme Sum Worldwide, Inc., a Nevada corporation; Gimme Sum California, Inc., a Nevada corporation; Gimme Sum Equipment, Inc., a Nevada corporation; Gimme Sum Franchise Corp., a Nevada corporation; Gimme Sum Louisiana, Inc., a Nevada corporation; Gimme Sum Marketing Fund, Inc., a Nevada corporation; Gimme Mum Minnesota, Inc., a Nevada corporation; Gimme Sum Real Estate Corp., a Nevada corporation...Case No.: A567964	Breach of Contract	Clark County, Nevada	Pending

None



b. Describe all property that has been attached, garnished or seized under any legal or equitable process within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF PERSON FOR WHOSE BENEFIT PROPERTY WAS SEIZED	DATE OF SEIZURE	DESCRIPTION AND VALUE OF PROPERTY
Charleston Falls, LLC c/o Carlos Huerta 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	3/5/2010	Interests within Mt. Charleston View, LLC \$2,500,000.00

NAME AND ADDRESS OF PERSON FOR WHOSE
BENEFIT PROPERTY WAS SEIZED

Mountain Gaming, LLC
c/o Carlos Huerta
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

DATE OF SEIZURE
3/5/2010

DESCRIPTION AND VALUE OF
PROPERTY

Restaurant and bar operation at the top of Mt.
Charleston, Nevada.
Approximate value - \$3,000,000.00

5. Repossessions, foreclosures and returns

None

■ List all property that has been repossessed by a creditor, sold at a foreclosure sale, transferred through a deed in lieu of foreclosure or returned to the seller, within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF
CREDITOR OR SELLER

DATE OF REPOSSESSION,
FORECLOSURE SALE,
TRANSFER OR RETURN

DESCRIPTION AND VALUE OF
PROPERTY

6. Assignments and receiverships

None

■ a. Describe any assignment of property for the benefit of creditors made within **120 days** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include any assignment by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF ASSIGNEE

DATE OF
ASSIGNMENT

TERMS OF ASSIGNMENT OR SETTLEMENT

None

■ b. List all property which has been in the hands of a custodian, receiver, or court-appointed official within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS
OF CUSTODIAN

NAME AND LOCATION
OF COURT
CASE TITLE & NUMBER

DATE OF
ORDER

DESCRIPTION AND VALUE OF
PROPERTY

7. Gifts

None

■ List all gifts or charitable contributions made within **one year** immediately preceding the commencement of this case except ordinary and usual gifts to family members aggregating less than \$200 in value per individual family member and charitable contributions aggregating less than \$100 per recipient. (Married debtors filing under chapter 12 or chapter 13 must include gifts or contributions by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF
PERSON OR ORGANIZATION

RELATIONSHIP TO
DEBTOR, IF ANY

DATE OF GIFT

DESCRIPTION AND
VALUE OF GIFT

8. Losses

None

■ List all losses from fire, theft, other casualty or gambling within **one year** immediately preceding the commencement of this case **or since the commencement of this case**. (Married debtors filing under chapter 12 or chapter 13 must include losses by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

DESCRIPTION AND VALUE
OF PROPERTY

DESCRIPTION OF CIRCUMSTANCES AND, IF
LOSS WAS COVERED IN WHOLE OR IN PART
BY INSURANCE, GIVE PARTICULARS

DATE OF LOSS

9. Payments related to debt counseling or bankruptcy

- None ☐ List all payments made or property transferred by or on behalf of the debtor to any persons, including attorneys, for consultation concerning debt consolidation, relief under the bankruptcy law or preparation of the petition in bankruptcy within **one year** immediately preceding the commencement of this case.

NAME AND ADDRESS OF PAYEE	DATE OF PAYMENT, NAME OF PAYOR IF OTHER THAN DEBTOR	AMOUNT OF MONEY OR DESCRIPTION AND VALUE OF PROPERTY
The Schwartz Law Firm 701 E. Bridger Avenue, Suite 120 Las Vegas, NV 89101	03/23/2010	\$25,000.00

10. Other transfers

- None ☐ a. List all other property, other than property transferred in the ordinary course of the business or financial affairs of the debtor, transferred either absolutely or as security within **two years** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include transfers by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF TRANSFEREE, RELATIONSHIP TO DEBTOR	DATE	DESCRIBE PROPERTY TRANSFERRED AND VALUE RECEIVED
Sigmund Rogich Investor/Member	10/31/2008	Eldorado Hills, LLC interest \$2,747,729.50 debt
The Villages, LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Various	\$32,000
Ashton Inn LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Various	\$42,100.00

- None ☒ b. List all property transferred by the debtor within **ten years** immediately preceding the commencement of this case to a self-settled trust or similar device of which the debtor is a beneficiary.

NAME OF TRUST OR OTHER DEVICE	DATE(S) OF TRANSFER(S)	AMOUNT OF MONEY OR DESCRIPTION AND VALUE OF PROPERTY OR DEBTOR'S INTEREST IN PROPERTY
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11. Closed financial accounts

- None ☐ List all financial accounts and instruments held in the name of the debtor or for the benefit of the debtor which were closed, sold, or otherwise transferred within **one year** immediately preceding the commencement of this case. Include checking, savings, or other financial accounts, certificates of deposit, or other instruments; shares and share accounts held in banks, credit unions, pension funds, cooperatives, associations, brokerage houses and other financial institutions. (Married debtors filing under chapter 12 or chapter 13 must include information concerning accounts or instruments held by or for either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF INSTITUTION	TYPE OF ACCOUNT, LAST FOUR DIGITS OF ACCOUNT NUMBER, AND AMOUNT OF FINAL BALANCE	AMOUNT AND DATE OF SALE OR CLOSING
Bank of Las Vegas 6001 S. Decatur Blvd., Ste P Las Vegas, NV 89118	Checking account number ending in 4029	10/28/2009 \$569.00
Bank of Las Vegas 6001 S. Decatur Blvd., Ste P Las Vegas, NV 89118	Money market account number ending in 3111	10/28/2009 \$3,506.00

12. Safe deposit boxes

- None ☐ List each safe deposit or other box or depository in which the debtor has or had securities, cash, or other valuables within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include boxes or depositories of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF BANK OR OTHER DEPOSITORY	NAMES AND ADDRESSES OF THOSE WITH ACCESS TO BOX OR DEPOSITORY	DESCRIPTION OF CONTENTS	DATE OF TRANSFER OR SURRENDER, IF ANY
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13. Setoffs

- None ☐ List all setoffs made by any creditor, including a bank, against a debt or deposit of the debtor within **90 days** preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATE OF SETOFF	AMOUNT OF SETOFF
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14. Property held for another person

- None ☐ List all property owned by another person that the debtor holds or controls.

NAME AND ADDRESS OF OWNER	DESCRIPTION AND VALUE OF PROPERTY	LOCATION OF PROPERTY
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15. Prior address of debtor

- None ☐ If the debtor has moved within **three years** immediately preceding the commencement of this case, list all premises which the debtor occupied during that period and vacated prior to the commencement of this case. If a joint petition is filed, report also any separate address of either spouse.

ADDRESS	NAME USED	DATES OF OCCUPANCY
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16. Spouses and Former Spouses

- None ☐ If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within **eight years** immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state.

NAME

17. Environmental Information.

For the purpose of this question, the following definitions apply:

"Environmental Law" means any federal, state, or local statute or regulation regulating pollution, contamination, releases of hazardous or toxic substances, wastes or material into the air, land, soil, surface water, groundwater, or other medium, including, but not limited to, statutes or regulations regulating the cleanup of these substances, wastes, or material.

"Site" means any location, facility, or property as defined under any Environmental Law, whether or not presently or formerly owned or operated by the debtor, including, but not limited to, disposal sites.

"Hazardous Material" means anything defined as a hazardous waste, hazardous substance, toxic substance, hazardous material, pollutant, or contaminant or similar term under an Environmental Law

- None ☐ a. List the name and address of every site for which the debtor has received notice in writing by a governmental unit that it may be liable or potentially liable under or in violation of an Environmental Law. Indicate the governmental unit, the date of the notice, and, if known, the Environmental Law:

SITE NAME AND ADDRESS	NAME AND ADDRESS OF GOVERNMENTAL UNIT	DATE OF NOTICE	ENVIRONMENTAL LAW
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- None ☒ b. List the name and address of every site for which the debtor provided notice to a governmental unit of a release of Hazardous Material. Indicate the governmental unit to which the notice was sent and the date of the notice.

SITE NAME AND ADDRESS	NAME AND ADDRESS OF GOVERNMENTAL UNIT	DATE OF NOTICE	ENVIRONMENTAL LAW
-----------------------	---------------------------------------	----------------	-------------------

- None ☒ c. List all judicial or administrative proceedings, including settlements or orders, under any Environmental Law with respect to which the debtor is or was a party. Indicate the name and address of the governmental unit that is or was a party to the proceeding, and the docket number.

NAME AND ADDRESS OF GOVERNMENTAL UNIT	DOCKET NUMBER	STATUS OR DISPOSITION
---------------------------------------	---------------	-----------------------

18 . Nature, location and name of business

- None ☐ a. *If the debtor is an individual*, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was an officer, director, partner, or managing executive of a corporation, partner in a partnership, sole proprietor, or was self-employed in a trade, profession, or other activity either full- or part-time within **six years** immediately preceding the commencement of this case, or in which the debtor owned 5 percent or more of the voting or equity securities within **six years** immediately preceding the commencement of this case.

If the debtor is a partnership, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was a partner or owned 5 percent or more of the voting or equity securities, within **six years** immediately preceding the commencement of this case.

If the debtor is a corporation, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was a partner or owned 5 percent or more of the voting or equity securities within **six years** immediately preceding the commencement of this case.

NAME	LAST FOUR DIGITS OF SOCIAL-SECURITY OR OTHER INDIVIDUAL TAXPAYER-I.D. NO. (ITIN)/ COMPLETE EIN	ADDRESS	NATURE OF BUSINESS	BEGINNING AND ENDING DATES
Go Global, Inc.	88-0432565	300 E. Post Road Ste. 110 Las Vegas, NV 89120	Real Estate Brokerage and Investment	07/29/1997-Present
BV 86, LLC		5451 South Durango Drive Las Vegas, NV 89113	Real Estate Investment Dissolved	10/2007-12/2008
Charleston Falls, LLC	20-515-7867	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	06/2006-Present
Eldorado II, LLC		3883 Howard Hughes Pkwy, #590 Las Vegas, NV 89169	Established to acquire property Dissolved	08/2007-08-2009
Mt. Charleston View, LLC	06-1758575	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	09-2005-
HPCH, LLC	06-1758580	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	09/2005-Present
Realized Gains, LLC	20-4715600	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	04/2005-03/2010
The Villages, LLC	20-4922242	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	03/2006-Present
Homestead 2001, LLC	88-0484401	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	01/2001-Present
ACND-1431, LLC	88-0462815	3060 E. Post Road #110 Las Vegas, NV 89120	Land Investment in Cedar Park, TX	04/27/2000-Present
ACND-38, LLC	88-0505322	3441 S. Eastern Avenue Las Vegas, NV 89109	Land Investment near Austin, TX	02/26/2001-12/28/2006

NAME	LAST FOUR DIGITS OF SOCIAL-SECURITY OR OTHER INDIVIDUAL TAXPAYER-I.D. NO. (ITIN)/ COMPLETE EIN	ADDRESS	NATURE OF BUSINESS	BEGINNING AND ENDING DATES
Ashton Development, LLC	20-5169026	3060 E. Post Road #110 Las Vegas, NV 89120	Land investment in Ashton, Idaho	07/10/2006-Present
Ashton RV, LLC	20-5581899	3060 E. Post Road #110 Las Vegas, NV 89120	RV Park in Ashton, ID	09/15/2006-Present
Ashton Inn, LLC	20-4935318	3060 E. Post Road #110 Las Vegas, NV 89120	Motel in Ashton, Idaho	05/23/2006-Present
CanaMex Nevada, LLC	26-1508635	3060 E. Post Road #110 Las Vegas, NV 89120	Industrial Land in Clark County, Nevada	12/03/2007-12/31/2009
Dean Martin Center, LLC	26-0395369	3060 E. Post Road #110 Las Vegas, NV 89120	Owned land in Las Vegas, Nevada	01/08/2007-12/31/2010
Greater Ashton, LLC	20-5581982	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Holding Company	09/15/2006-Present
Las Vegas Silicon Valley, LLC		3060 E. Post Road, Ste. 110 Las Vegas, NV 89120		
McCarran Development, LLC	06-1758579	1445 Eastwood Drive Reno, NV 89509	Real Estate Investment Company	09/21/2005-2010
Tomdan International, LLC	77-0644541	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment Company	08/04/2004-04/01/2009

None ☐ b. Identify any business listed in response to subdivision a., above, that is "single asset real estate" as defined in 11 U.S.C. § 101.

NAME	ADDRESS
HPCH, LLC	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120
The Villages, LLC	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120
ACND-1431, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
ACND-38, LLC	3441 S. Eastern Avenue Las Vegas, NV 89109
Ashton Development, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
Ashton RV, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
Ashton Inn, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
CanaMex Nevada, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
Dean Martin Center, LLC	3060 E. Post Road #110 Las Vegas, NV 89120
Greater Ashton, LLC	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120
McCarran Development, LLC	1445 Eastwood Drive Reno, NV 89509

The following questions are to be completed by every debtor that is a corporation or partnership and by any individual debtor who is or has been, within **six years** immediately preceding the commencement of this case, any of the following: an officer, director, managing executive, or owner of more than 5 percent of the voting or equity securities of a corporation; a partner, other than a limited partner, of a partnership, a sole proprietor or self-employed in a trade, profession, or other activity, either full- or part-time.

(An individual or joint debtor should complete this portion of the statement **only** if the debtor is or has been in business, as defined above, within six years immediately preceding the commencement of this case. A debtor who has not been in business within those six years should go directly to the signature page.)

19. Books, records and financial statements

- None ☐ a. List all bookkeepers and accountants who within **two years** immediately preceding the filing of this bankruptcy case kept or supervised the keeping of books of account and records of the debtor.

NAME AND ADDRESS
Lynda Keeton CPA, LLC
375 N. Stephanie Street
Bldg. 2
Henderson, NV 89014

DATES SERVICES RENDERED
01/2010-Present

LL Bradford & Co.
8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

12/1997-Present

Shelby Keefer CPA
7201 W. Lake Mead Blvd.
Ste. 502
Las Vegas, NV 89128

04/2008-Present

- None ☐ b. List all firms or individuals who within the **two years** immediately preceding the filing of this bankruptcy case have audited the books of account and records, or prepared a financial statement of the debtor.

NAME ADDRESS
Summer Rellamas **1182 Claire Rose Avenue**
Las Vegas, NV 89183

DATES SERVICES RENDERED
02/2005-09/2009

- None ☐ c. List all firms or individuals who at the time of the commencement of this case were in possession of the books of account and records of the debtor. If any of the books of account and records are not available, explain.

NAME
Lynda Keeton CPA, LLC

ADDRESS
375 N. Stephanie Street
Bldg. 2
Henderson, NV 89014

LL Bradford & Co.

8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

Shelby Keefer CPA

7201 W. Lake Mead Blvd.
Ste. 502
Las Vegas, NV 89128

- None ☐ d. List all financial institutions, creditors and other parties, including mercantile and trade agencies, to whom a financial statement was issued by the debtor within **two years** immediately preceding the commencement of this case.

NAME AND ADDRESS
Nevada State Bank
750 E. Warm Springs Road, 4th Floor
Las Vegas, NV 89119

DATE ISSUED
04/2008

City National Bank
555 South Flower Street
Los Angeles, CA 90071

06/2009

20. Inventories

- None ☒ a. List the dates of the last two inventories taken of your property, the name of the person who supervised the taking of each inventory, and the dollar amount and basis of each inventory.

DATE OF INVENTORY	INVENTORY SUPERVISOR	DOLLAR AMOUNT OF INVENTORY (Specify cost, market or other basis)
-------------------	----------------------	---

- None ☒ b. List the name and address of the person having possession of the records of each of the two inventories reported in a., above.

DATE OF INVENTORY	NAME AND ADDRESSES OF CUSTODIAN OF INVENTORY RECORDS
-------------------	---

21 . Current Partners, Officers, Directors and Shareholders

- None ☒ a. If the debtor is a partnership, list the nature and percentage of partnership interest of each member of the partnership.

NAME AND ADDRESS	NATURE OF INTEREST	PERCENTAGE OF INTEREST
------------------	--------------------	------------------------

- None ☐ b. If the debtor is a corporation, list all officers and directors of the corporation, and each stockholder who directly or indirectly owns, controls, or holds 5 percent or more of the voting or equity securities of the corporation.

NAME AND ADDRESS	TITLE	NATURE AND PERCENTAGE OF STOCK OWNERSHIP
Christine Huerta	Secretary	
Joseph Rainone	Treasurer	

22 . Former partners, officers, directors and shareholders

- None ☒ a. If the debtor is a partnership, list each member who withdrew from the partnership within **one year** immediately preceding the commencement of this case.

NAME	ADDRESS	DATE OF WITHDRAWAL
------	---------	--------------------

- None ☒ b. If the debtor is a corporation, list all officers, or directors whose relationship with the corporation terminated within **one year** immediately preceding the commencement of this case.

NAME AND ADDRESS	TITLE	DATE OF TERMINATION
------------------	-------	---------------------

23 . Withdrawals from a partnership or distributions by a corporation

- None ☒ If the debtor is a partnership or corporation, list all withdrawals or distributions credited or given to an insider, including compensation in any form, bonuses, loans, stock redemptions, options exercised and any other perquisite during **one year** immediately preceding the commencement of this case.

NAME & ADDRESS OF RECIPIENT, RELATIONSHIP TO DEBTOR	DATE AND PURPOSE OF WITHDRAWAL	AMOUNT OF MONEY OR DESCRIPTION AND VALUE OF PROPERTY
---	-----------------------------------	--

24. Tax Consolidation Group.

- None ☒ If the debtor is a corporation, list the name and federal taxpayer identification number of the parent corporation of any consolidated group for tax purposes of which the debtor has been a member at any time within **six years** immediately preceding the commencement of the case.

NAME OF PARENT CORPORATION	TAXPAYER IDENTIFICATION NUMBER (EIN)
----------------------------	--------------------------------------

25. Pension Funds.

None ☐ If the debtor is not an individual, list the name and federal taxpayer identification number of any pension fund to which the debtor, as an employer, has been responsible for contributing at any time within **six years** immediately preceding the commencement of the case.

NAME OF PENSION FUND

TAXPAYER IDENTIFICATION NUMBER (EIN)

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I declare under penalty of perjury that I have read the answers contained in the foregoing statement of financial affairs and any attachments thereto and that they are true and correct to the best of my knowledge, information and belief.

Date January 19, 2012Signature /s/ Carlos A. Huerta
Carlos A. Huerta
President

[An individual signing on behalf of a partnership or corporation must indicate position or relationship to debtor.]

Penalty for making a false statement: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571

Exhibit C

B4 (Official Form 4) (12/07)

United States Bankruptcy Court
District of Nevada

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11**

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

Following is the list of the debtor's creditors holding the 20 largest unsecured claims. The list is prepared in accordance with Fed. R. Bankr. P. 1007(d) for filing in this chapter 11 [or chapter 9] case. The list does not include (1) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101, or (2) secured creditors unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the 20 largest unsecured claims. If a minor child is one of the creditors holding the 20 largest unsecured claims, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See 11 U.S.C. § 112; Fed. R. Bankr. P. 1007(m).

(1) <i>Name of creditor and complete mailing address including zip code</i>	(2) <i>Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted</i>	(3) <i>Nature of claim (trade debt, bank loan, government contract, etc.)</i>	(4) <i>Indicate if claim is contingent, unliquidated, disputed, or subject to setoff</i>	(5) <i>Amount of claim [if secured, also state value of security]</i>
American Express PO Box 0001 Los Angeles, CA 90096-0001	American Express PO Box 0001 Los Angeles, CA 90096-0001	Credit Card		3,000.00
Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148	Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148	Signature Loan	Contingent	3,800,000.00
Arie Fisher 16 Rashi Street Ra'anana, Israel 43214	Arie Fisher 16 Rashi Street Ra'anana, Israel 43214	Personal loan		41,200.00
Bailus Cook & Kelesis 400 S. Fourth Street, Suite 300 Las Vegas, NV 89101	Bailus Cook & Kelesis 400 S. Fourth Street, Suite 300 Las Vegas, NV 89101	Legal Consulting		4,800.14
Bank Of America Po Box 26078 Greensboro, NC 27420	Bank Of America Po Box 26078 Greensboro, NC 27420	Business Line of Credit		46,774.04
Gordon & Silver 3960 Howard Hughes Pkwy 9th Floor Las Vegas, NV 89169	Gordon & Silver 3960 Howard Hughes Pkwy 9th Floor Las Vegas, NV 89169	Legal Fees	Disputed	57,000.00
Hugo R. Paulson 5024 E. Lafayette Blvd. Phoenix, AZ 85018	Hugo R. Paulson 5024 E. Lafayette Blvd. Phoenix, AZ 85018	Partially secured by a pledge of the Debtor's interest in Pecan Street Plaza, LLC	Contingent Disputed	1,803,000.00
Kolesar & Leatham 3320 W. Sahara Avenue, Ste. 380 Las Vegas, NV 89102	Kolesar & Leatham 3320 W. Sahara Avenue, Ste. 380 Las Vegas, NV 89102	Legal Consulting		17,346.91
LL Bradford & Co. 8880 W. Sunset Road, 3rd Floor Las Vegas, NV 89148	LL Bradford & Co. 8880 W. Sunset Road, 3rd Floor Las Vegas, NV 89148	Accounting/Consulting		6,000.00

B4 (Official Form 4) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor(s)

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

(Continuation Sheet)

(1) <i>Name of creditor and complete mailing address including zip code</i>	(2) <i>Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted</i>	(3) <i>Nature of claim (trade debt, bank loan, government contract, etc.)</i>	(4) <i>Indicate if claim is contingent, unliquidated, disputed, or subject to setoff</i>	(5) <i>Amount of claim [if secured, also state value of security]</i>
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	Mt. Charleston Lodge (owned by Mount Charleston View, LLC)		1,709,000.00
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	3060 E. Post Road, #110 Las Vegas, NV 89120		654,000.00 (0.00 secured)
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	Business Line of Credit		653,000.00
One Cap Financial 5440 W. Sahara Avenue 3rd Floor Las Vegas, NV 89145	One Cap Financial 5440 W. Sahara Avenue 3rd Floor Las Vegas, NV 89145	290 Acres in Nye County, NV 300 acre-feet of water rights	Contingent	4,100,000.00
Ray Koroghli 3055 Via Sarafina Avenue Henderson, NV 89052	Ray Koroghli 3055 Via Sarafina Avenue Henderson, NV 89052	Legal bills		154,900.00
Zions Bank P.O. Box 25855 Salt Lake City, UT 84125	Zions Bank P.O. Box 25855 Salt Lake City, UT 84125			617,763.00

**DECLARATION UNDER PENALTY OF PERJURY
ON BEHALF OF A CORPORATION OR PARTNERSHIP**

I, the President of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing list and that it is true and correct to the best of my information and belief.

Date **June 4, 2010**

Signature **/s/ Carlos A. Huerta**
Carlos A. Huerta
President

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.

B6 Summary (Official Form 6 - Summary) (12/07)

United States Bankruptcy Court
District of Nevada

In re **Go Global, Inc.**,
Debtor

Case No. **10-14804-BAM**Chapter **11**

SUMMARY OF SCHEDULES

Indicate as to each schedule whether that schedule is attached and state the number of pages in each. Report the totals from Schedules A, B, D, E, F, I, and J in the boxes provided. Add the amounts from Schedules A and B to determine the total amount of the debtor's assets. Add the amounts of all claims from Schedules D, E, and F to determine the total amount of the debtor's liabilities. Individual debtors must also complete the "Statistical Summary of Certain Liabilities and Related Data" if they file a case under chapter 7, 11, or 13.

NAME OF SCHEDULE	ATTACHED (YES/NO)	NO. OF SHEETS	ASSETS	LIABILITIES	OTHER
A - Real Property	Yes	1	4,000.00		
B - Personal Property	Yes	5	10,683,395.23		
C - Property Claimed as Exempt	No	0			
D - Creditors Holding Secured Claims	Yes	1		654,000.00	
E - Creditors Holding Unsecured Priority Claims (Total of Claims on Schedule E)	Yes	1		0.00	
F - Creditors Holding Unsecured Nonpriority Claims	Yes	3		13,013,784.09	
G - Executory Contracts and Unexpired Leases	Yes	1			
H - Codebtors	Yes	2			
I - Current Income of Individual Debtor(s)	No	0			N/A
J - Current Expenditures of Individual Debtor(s)	No	0			N/A
Total Number of Sheets of ALL Schedules		14			
Total Assets			10,687,395.23		
Total Liabilities				13,667,784.09	

Form 6 - Statistical Summary (12/07)

United States Bankruptcy Court
District of Nevada

In re **Go Global, Inc.**,
Debtor

Case No. **10-14804-BAM**Chapter **11**

STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA (28 U.S.C. § 159)

If you are an individual debtor whose debts are primarily consumer debts, as defined in § 101(8) of the Bankruptcy Code (11 U.S.C. § 101(8)), filing a case under chapter 7, 11 or 13, you must report all information requested below.

- ☐ Check this box if you are an individual debtor whose debts are NOT primarily consumer debts. You are not required to report any information here.

This information is for statistical purposes only under 28 U.S.C. § 159.

Summarize the following types of liabilities, as reported in the Schedules, and total them.

Type of Liability	Amount
Domestic Support Obligations (from Schedule E)	
Taxes and Certain Other Debts Owed to Governmental Units (from Schedule E)	
Claims for Death or Personal Injury While Debtor Was Intoxicated (from Schedule E) (whether disputed or undisputed)	
Student Loan Obligations (from Schedule F)	
Domestic Support, Separation Agreement, and Divorce Decree Obligations Not Reported on Schedule E	
Obligations to Pension or Profit-Sharing, and Other Similar Obligations (from Schedule F)	
TOTAL	

State the following:

Average Income (from Schedule I, Line 16)	
Average Expenses (from Schedule J, Line 18)	
Current Monthly Income (from Form 22A Line 12; OR, Form 22B Line 11; OR, Form 22C Line 20)	

State the following:

1. Total from Schedule D, "UNSECURED PORTION, IF ANY" column		
2. Total from Schedule E, "AMOUNT ENTITLED TO PRIORITY" column		
3. Total from Schedule E, "AMOUNT NOT ENTITLED TO PRIORITY, IF ANY" column		
4. Total from Schedule F		
5. Total of non-priority unsecured debt (sum of 1, 3, and 4)		

B6A (Official Form 6A) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE A - REAL PROPERTY

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a cotenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim." If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

Description and Location of Property	Nature of Debtor's Interest in Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption	Amount of Secured Claim
1255 Empire Avenue Park City, Utah, 84060 Timeshare 100% Interest		-	4,000.00	0.00

Sub-Total > **4,000.00** (Total of this page)

Total > **4,000.00**

(Report also on Summary of Schedules)

0 continuation sheets attached to the Schedule of Real Property

B6B (Official Form 6B) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE B - PERSONAL PROPERTY

Except as directed below, list all personal property of the debtor of whatever kind. If the debtor has no property in one or more of the categories, place an "x" in the appropriate position in the column labeled "None." If additional space is needed in any category, attach a separate sheet properly identified with the case name, case number, and the number of the category. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor is an individual or a joint petition is filed, state the amount of any exemptions claimed only in Schedule C - Property Claimed as Exempt.

Do not list interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If the property is being held for the debtor by someone else, state that person's name and address under "Description and Location of Property." If the property is being held for a minor child, simply state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. § 112 and Fed. R. Bankr. P. 1007(m).

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
1. Cash on hand		Petty Cash	-	2,000.00
2. Checking, savings or other financial accounts, certificates of deposit, or shares in banks, savings and loan, thrift, building and loan, and homestead associations, or credit unions, brokerage houses, or cooperatives.		Bank of America checking account number ending in 9840 Carlos A. Huerta dba Go Global	-	3,188.22
		Bank of America checking account number ending in 4274	-	4,561.79
		Nevada State Bank account number ending in 4471	-	9,266.61
		Bank of America Business Interest Maximizer account ending in 5642	-	1,728.44
3. Security deposits with public utilities, telephone companies, landlords, and others.	X			
4. Household goods and furnishings, including audio, video, and computer equipment.	X			
5. Books, pictures and other art objects, antiques, stamp, coin, record, tape, compact disc, and other collections or collectibles.		Frames, Posters, Photographs	-	1,500.00
6. Wearing apparel.	X			
7. Furs and jewelry.	X			
8. Firearms and sports, photographic, and other hobby equipment.		Gym equipment	-	2,500.00
9. Interests in insurance policies. Name insurance company of each policy and itemize surrender or refund value of each.	X			

Sub-Total > **24,745.06**
(Total of this page)

4 continuation sheets attached to the Schedule of Personal Property

B6B (Official Form 6B) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
10. Annuities. Itemize and name each issuer.	X			
11. Interests in an education IRA as defined in 26 U.S.C. § 530(b)(1) or under a qualified State tuition plan as defined in 26 U.S.C. § 529(b)(1). Give particulars. (File separately the record(s) of any such interest(s). 11 U.S.C. § 521(c).)	X			
12. Interests in IRA, ERISA, Keogh, or other pension or profit sharing plans. Give particulars.	X			
13. Stock and interests in incorporated and unincorporated businesses. Itemize.		Las Vegas Silicon Valley, LLC 50% Interest	-	5,000.00
		ACND 1431, LLC 15% Interest	-	292,500.00
		Canamex Nevada, LLC 1.0% Interest	-	14,000.00
		Charleston Falls, LLC 77.7% Interest	-	1,416,666.67
		Dean Martin, LLC 9.0% Interest	-	0.00
		HC Waterstone, LLC 99.9% Interest	-	0.00
		Homestead 2001, LLC 7.4% Interest	-	150,000.00
		HPCH, LLC 100% Interest	-	150,000.00
		Jonathan Company, LLC 23.1% Interest	-	0.00
		McCarran Development, LLC	-	0.00
		Realized Gains, LLC 50% Interest	-	0.00
		San Lucas, LLC 50% Interest	-	0.00

Sub-Total > **2,028,166.67**
(Total of this page)

Sheet **1** of **4** continuation sheets attached
to the Schedule of Personal Property

B6B (Official Form 6B) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
		The Villages, LLC 99.0% Interest	-	50,000.00
		War Admiral, LLC 18% Interest	-	400,000.00
		Pecan Street Plaza, LLC 15.9% Interest	-	165,000.00
		Greater Ashton, LLC 85% Interest	-	1,176,000.00
14. Interests in partnerships or joint ventures. Itemize.	X			
15. Government and corporate bonds and other negotiable and nonnegotiable instruments.	X			
16. Accounts receivable.		John deVries/Gimme Sum Worldwide	-	3,111,041.00
		Alex Maynard	-	90,305.00
		Thaddeus A Wier	-	127,834.00
		Daniel DeARmas	-	237,945.00
		Moses Johnson	-	48,129.00
		Sig Rogich	-	2,747,729.50
		IRS	-	300,000.00
17. Alimony, maintenance, support, and property settlements to which the debtor is or may be entitled. Give particulars.	X			
18. Other liquidated debts owed to debtor including tax refunds. Give particulars.	X			
19. Equitable or future interests, life estates, and rights or powers exercisable for the benefit of the debtor other than those listed in Schedule A - Real Property.	X			

Sub-Total > **8,453,983.50**
(Total of this page)

Sheet **2** of **4** continuation sheets attached
to the Schedule of Personal Property

B6B (Official Form 6B) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
20. Contingent and noncontingent interests in estate of a decedent, death benefit plan, life insurance policy, or trust.	X			
21. Other contingent and unliquidated claims of every nature, including tax refunds, counterclaims of the debtor, and rights to setoff claims. Give estimated value of each.		10% ownership interest in the rights to the potential purchase of a Henderson, NV property totaling 12.5 acres (known as the "St. Rose" property)	-	170,000.00
22. Patents, copyrights, and other intellectual property. Give particulars.	X			
23. Licenses, franchises, and other general intangibles. Give particulars.	X			
24. Customer lists or other compilations containing personally identifiable information (as defined in 11 U.S.C. § 101(41A)) provided to the debtor by individuals in connection with obtaining a product or service from the debtor primarily for personal, family, or household purposes.	X			
25. Automobiles, trucks, trailers, and other vehicles and accessories.	X			
26. Boats, motors, and accessories.	X			
27. Aircraft and accessories.	X			
28. Office equipment, furnishings, and supplies.		Copy Maching, Printer, Computer, Video Projector, Computer Monitors	-	6,500.00
29. Machinery, fixtures, equipment, and supplies used in business.	X			
30. Inventory.	X			
31. Animals.	X			
32. Crops - growing or harvested. Give particulars.	X			
33. Farming equipment and implements.	X			

Sub-Total > **176,500.00**
(Total of this page)

Sheet **3** of **4** continuation sheets attached
to the Schedule of Personal Property

B6B (Official Form 6B) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
34. Farm supplies, chemicals, and feed.	X			
35. Other personal property of any kind not already listed. Itemize.	X			

Sub-Total > **0.00**
(Total of this page)
Total > **10,683,395.23**

(Report also on Summary of Schedules)

Sheet **4** of **4** continuation sheets attached
to the Schedule of Personal Property

B6D (Official Form 6D) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE D - CREDITORS HOLDING SECURED CLAIMS

State the name, mailing address, including zip code, and last four digits of any account number of all entities holding claims secured by property of the debtor as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. List creditors holding all types of secured interests such as judgment liens, garnishments, statutory liens, mortgages, deeds of trust, and other security interests.

List creditors in alphabetical order to the extent practicable. If a minor child is a creditor, the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m). If all secured creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor", include the entity on the appropriate schedule of creditors, and complete Schedule H - Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H", "W", "J", or "C" in the column labeled "Husband, Wife, Joint, or Community".

If the claim is contingent, place an "X" in the column labeled "Contingent". If the claim is unliquidated, place an "X" in the column labeled "Unliquidated". If the claim is disputed, place an "X" in the column labeled "Disputed". (You may need to place an "X" in more than one of these three columns.)

Total the columns labeled "Amount of Claim Without Deducting Value of Collateral" and "Unsecured Portion, if Any" in the boxes labeled "Total(s)" on the last sheet of the completed schedule. Report the total from the column labeled "Amount of Claim" also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts, report the total from the column labeled "Unsecured Portion" on the Statistical Summary of Certain Liabilities and Related Data.

☐ Check this box if debtor has no creditors holding secured claims to report on this Schedule D.

CREDITOR'S NAME AND MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B T O R	H U S B A N D W I F E J O I N T C O M M U N I T Y	DATE CLAIM WAS INCURRED, NATURE OF LIEN, AND DESCRIPTION AND VALUE OF PROPERTY SUBJECT TO LIEN	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM WITHOUT DEDUCTING VALUE OF COLLATERAL	UNSECURED PORTION, IF ANY
Account No. 0180910033179005001	X -		3060 E. Post Road, #110 Las Vegas, NV 89120					
Value \$ 0.00					654,000.00	654,000.00		
Account No.								
Value \$								
Account No.								
Value \$								
Account No.								
Value \$								
Subtotal (Total of this page)							654,000.00	654,000.00
Total (Report on Summary of Schedules)							654,000.00	654,000.00

0 continuation sheets attached

B6E (Official Form 6E) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE E - CREDITORS HOLDING UNSECURED PRIORITY CLAIMS

A complete list of claims entitled to priority, listed separately by type of priority, is to be set forth on the sheets provided. Only holders of unsecured claims entitled to priority should be listed in this schedule. In the boxes provided on the attached sheets, state the name, mailing address, including zip code, and last four digits of the account number, if any, of all entities holding priority claims against the debtor or the property of the debtor, as of the date of the filing of the petition. Use a separate continuation sheet for each type of priority and label each with the type of priority.

The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. § 112 and Fed. R. Bankr. P. 1007(m).

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include the entity on the appropriate schedule of creditors, and complete Schedule H-Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of claims listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all claims listed on this Schedule E in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules.

Report the total of amounts entitled to priority listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all amounts entitled to priority listed on this Schedule E in the box labeled "Totals" on the last sheet of the completed schedule. Individual debtors with primarily consumer debts report this total also on the Statistical Summary of Certain Liabilities and Related Data.

Report the total of amounts not entitled to priority listed on each sheet in the box labeled "Subtotals" on each sheet. Report the total of all amounts not entitled to priority listed on this Schedule E in the box labeled "Totals" on the last sheet of the completed schedule. Individual debtors with primarily consumer debts report this total also on the Statistical Summary of Certain Liabilities and Related Data.

☒ Check this box if debtor has no creditors holding unsecured priority claims to report on this Schedule E.

TYPES OF PRIORITY CLAIMS (Check the appropriate box(es) below if claims in that category are listed on the attached sheets)☐ **Domestic support obligations**

Claims for domestic support that are owed to or recoverable by a spouse, former spouse, or child of the debtor, or the parent, legal guardian, or responsible relative of such a child, or a governmental unit to whom such a domestic support claim has been assigned to the extent provided in 11 U.S.C. § 507(a)(1).

☐ **Extensions of credit in an involuntary case**

Claims arising in the ordinary course of the debtor's business or financial affairs after the commencement of the case but before the earlier of the appointment of a trustee or the order for relief. 11 U.S.C. § 507(a)(3).

☐ **Wages, salaries, and commissions**

Wages, salaries, and commissions, including vacation, severance, and sick leave pay owing to employees and commissions owing to qualifying independent sales representatives up to \$10,950* per person earned within 180 days immediately preceding the filing of the original petition, or the cessation of business, whichever occurred first, to the extent provided in 11 U.S.C. § 507(a)(4).

☐ **Contributions to employee benefit plans**

Money owed to employee benefit plans for services rendered within 180 days immediately preceding the filing of the original petition, or the cessation of business, whichever occurred first, to the extent provided in 11 U.S.C. § 507(a)(5).

☐ **Certain farmers and fishermen**

Claims of certain farmers and fishermen, up to \$5,400* per farmer or fisherman, against the debtor, as provided in 11 U.S.C. § 507(a)(6).

☐ **Deposits by individuals**

Claims of individuals up to \$2,425* for deposits for the purchase, lease, or rental of property or services for personal, family, or household use, that were not delivered or provided. 11 U.S.C. § 507(a)(7).

☐ **Taxes and certain other debts owed to governmental units**

Taxes, customs duties, and penalties owing to federal, state, and local governmental units as set forth in 11 U.S.C. § 507(a)(8).

☐ **Commitments to maintain the capital of an insured depository institution**

Claims based on commitments to the FDIC, RTC, Director of the Office of Thrift Supervision, Comptroller of the Currency, or Board of Governors of the Federal Reserve System, or their predecessors or successors, to maintain the capital of an insured depository institution. 11 U.S.C. § 507(a)(9).

☐ **Claims for death or personal injury while debtor was intoxicated**

Claims for death or personal injury resulting from the operation of a motor vehicle or vessel while the debtor was intoxicated from using alcohol, a drug, or another substance. 11 U.S.C. § 507(a)(10).

* Amounts are subject to adjustment on April 1, 2010, and every three years thereafter with respect to cases commenced on or after the date of adjustment.

B6F (Official Form 6F) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

State the name, mailing address, including zip code, and last four digits of any account number, of all entities holding unsecured claims without priority against the debtor or the property of the debtor, as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m). Do not include claims listed in Schedules D and E. If all creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include the entity on the appropriate schedule of creditors, and complete Schedule H - Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community."

If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of all claims listed on this schedule in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts, report this total also on the Statistical Summary of Certain Liabilities and Related Data.

☐ Check this box if debtor has no creditors holding unsecured claims to report on this Schedule F.

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B T O R H U S B A N D W I F E J O I N T C O M M U N I T Y	Husband, Wife, Joint, or Community	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM
		DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.				
Account No. 372717347753005 American Express PO Box 0001 Los Angeles, CA 90096-0001	X	-				3,000.00
Account No. Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148	X	-	X			3,800,000.00
Account No. Arie Fisher 16 Rashi Street Ra'anana, Israel 43214	-					41,200.00
Account No. 31157 Bailus Cook & Kelesis 400 S. Fourth Street, Suite 300 Las Vegas, NV 89101	-					4,800.14
Subtotal (Total of this page)						3,849,000.14

2 continuation sheets attached

B6F (Official Form 6F) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B O R	Husband, Wife, Joint, or Community	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM
		DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.				
Account No. 68181004915099		Business Line of Credit				
Bank Of America Po Box 26078 Greensboro, NC 27420	X -					46,774.04
Account No.		Legal Fees				
Gordon & Silver 3960 Howard Hughes Pkwy 9th Floor Las Vegas, NV 89169	X -				X	57,000.00
Account No.		Partially secured by a pledge of the Debtor's interest in Pecan Street Plaza, LLC				
Hugo R. Paulson 5024 E. Lafayette Blvd. Phoenix, AZ 85018	X -		X		X	1,803,000.00
Account No.		Legal Consulting				
Kolesar & Leatham 3320 W. Sahara Avenue, Ste. 380 Las Vegas, NV 89102	X -					17,346.91
Account No.		Accounting/Consulting				
LL Bradford & Co. 8880 W. Sunset Road, 3rd Floor Las Vegas, NV 89148	X -					6,000.00
Sheet no. <u>1</u> of <u>2</u> sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims						Subtotal (Total of this page)
						1,930,120.95

B6F (Official Form 6F) (12/07) - Cont.

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B O R	Husband, Wife, Joint, or Community	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM
		DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.				
Account No. 0180910026431979002		Business Line of Credit				
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	X -					653,000.00
Account No. 0180910053732049001		Mt. Charleston Lodge (owned by Mount Charleston View, LLC)				
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	X -					1,709,000.00
Account No.		290 Acres in Nye County, NV 300 acre-feet of water rights				
One Cap Financial 5440 W. Sahara Avenue 3rd Floor Las Vegas, NV 89145	-		X			4,100,000.00
Account No.		Legal bills				
Ray Koroghli 3055 Via Sarafina Avenue Henderson, NV 89052	-					154,900.00
Account No. 0010039798978529001						
Zions Bank P.O. Box 25855 Salt Lake City, UT 84125	X -					617,763.00
Sheet no. 2 of 2 sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims						Subtotal (Total of this page)
						7,234,663.00
						Total (Report on Summary of Schedules)
						13,013,784.09

B6G (Official Form 6G) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE G - EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Describe all executory contracts of any nature and all unexpired leases of real or personal property. Include any timeshare interests. State nature of debtor's interest in contract, i.e., "Purchaser", "Agent", etc. State whether debtor is the lessor or lessee of a lease. Provide the names and complete mailing addresses of all other parties to each lease or contract described. If a minor child is a party to one of the leases or contracts, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

☐ Check this box if debtor has no executory contracts or unexpired leases.

Name and Mailing Address, Including Zip Code, of Other Parties to Lease or Contract	Description of Contract or Lease and Nature of Debtor's Interest. State whether lease is for nonresidential real property. State contract number of any government contract.
HPCH, LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Office rental space expires 04/30/2012

0

_____ continuation sheets attached to Schedule of Executory Contracts and Unexpired Leases

B6H (Official Form 6H) (12/07)

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE H - CODEBTORS

Provide the information requested concerning any person or entity, other than a spouse in a joint case, that is also liable on any debts listed by debtor in the schedules of creditors. Include all guarantors and co-signers. If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within the eight year period immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state, commonwealth, or territory. Include all names used by the nondebtor spouse during the eight years immediately preceding the commencement of this case. If a minor child is a codebtor or a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

☐ Check this box if debtor has no codebtors.

NAME AND ADDRESS OF CODEBTOR	NAME AND ADDRESS OF CREDITOR
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Zions Bank P.O. Box 25855 Salt Lake City, UT 84125
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	American Express PO Box 0001 Los Angeles, CA 90096-0001
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Bank Of America Po Box 26078 Greensboro, NC 27420
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Gordon & Silver 3960 Howard Hughes Pkwy 9th Floor Las Vegas, NV 89169
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Hugo R. Paulson 5024 E. Lafayette Blvd. Phoenix, AZ 85018
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	LL Bradford & Co. 8880 W. Sunset Road, 3rd Floor Las Vegas, NV 89148
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Kolesar & Leatham 3320 W. Sahara Avenue, Ste. 380 Las Vegas, NV 89102
Carlos A. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125
Christine H. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125

In re **Go Global, Inc.**Case No. **10-14804-BAM**

Debtor

SCHEDULE H - CODEBTORS

(Continuation Sheet)

NAME AND ADDRESS OF CODEBTOR	NAME AND ADDRESS OF CREDITOR
Christine H. Huerta 3060 E. Post Road #110 Las Vegas, NV 89120	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125
Hugo Paulson 5024 E. Lafayette Blvd. Phoenix, AZ 85018	Nevada State Bank P.O. Box 990 Las Vegas, NV 89125
Sigmund Rogich 3883 Howard Hughes Pkwy, Ste 550 Las Vegas, NV 89169	Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148

B6 Declaration (Official Form 6 - Declaration). (12/07)

**United States Bankruptcy Court
District of Nevada**In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11****DECLARATION CONCERNING DEBTOR'S SCHEDULES**

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the President of the corporation named as debtor in this case, declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of **16** sheets, and that they are true and correct to the best of my knowledge, information, and belief.

Date **June 4, 2010**Signature **/s/ Carlos A. Huerta****Carlos A. Huerta
President**

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.

B7 (Official Form 7) (12/07)

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11**

STATEMENT OF FINANCIAL AFFAIRS

This statement is to be completed by every debtor. Spouses filing a joint petition may file a single statement on which the information for both spouses is combined. If the case is filed under chapter 12 or chapter 13, a married debtor must furnish information for both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed. An individual debtor engaged in business as a sole proprietor, partner, family farmer, or self-employed professional, should provide the information requested on this statement concerning all such activities as well as the individual's personal affairs. To indicate payments, transfers and the like to minor children, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. § 112; Fed. R. Bankr. P. 1007(m).

Questions 1 - 18 are to be completed by all debtors. Debtors that are or have been in business, as defined below, also must complete Questions 19 - 25. **If the answer to an applicable question is "None," mark the box labeled "None."** If additional space is needed for the answer to any question, use and attach a separate sheet properly identified with the case name, case number (if known), and the number of the question.

DEFINITIONS

"In business." A debtor is "in business" for the purpose of this form if the debtor is a corporation or partnership. An individual debtor is "in business" for the purpose of this form if the debtor is or has been, within six years immediately preceding the filing of this bankruptcy case, any of the following: an officer, director, managing executive, or owner of 5 percent or more of the voting or equity securities of a corporation; a partner, other than a limited partner, of a partnership; a sole proprietor or self-employed full-time or part-time. An individual debtor also may be "in business" for the purpose of this form if the debtor engages in a trade, business, or other activity, other than as an employee, to supplement income from the debtor's primary employment.

"Insider." The term "insider" includes but is not limited to: relatives of the debtor; general partners of the debtor and their relatives; corporations of which the debtor is an officer, director, or person in control; officers, directors, and any owner of 5 percent or more of the voting or equity securities of a corporate debtor and their relatives; affiliates of the debtor and insiders of such affiliates; any managing agent of the debtor. 11 U.S.C. § 101.

1. Income from employment or operation of business

None

☐

State the gross amount of income the debtor has received from employment, trade, or profession, or from operation of the debtor's business, including part-time activities either as an employee or in independent trade or business, from the beginning of this calendar year to the date this case was commenced. State also the gross amounts received during the **two years** immediately preceding this calendar year. (A debtor that maintains, or has maintained, financial records on the basis of a fiscal rather than a calendar year may report fiscal year income. Identify the beginning and ending dates of the debtor's fiscal year.) If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income of both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT
\$0.00
\$9,833.34
\$65,410.49

SOURCE
2010 YTD Income
2009 Income
2008 Income
AFLPA income = \$1,577.11;
Tomdan International, LLC income = \$4,833.34;
Go Global, Inc. income = \$59,000.04;

2. Income other than from employment or operation of business

None

☐ State the amount of income received by the debtor other than from employment, trade, profession, or operation of the debtor's business during the **two years** immediately preceding the commencement of this case. Give particulars. If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income for each spouse whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT
\$15,000.00

SOURCE
2008 - Mountain Gaming, LLC

3. Payments to creditors

None

☐ **Complete a. or b., as appropriate, and c.**

a. *Individual or joint debtor(s) with primarily consumer debts.* List all payments on loans, installment purchases of goods or services, and other debts to any creditor made within **90 days** immediately preceding the commencement of this case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$600. Indicate with an (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS	AMOUNT PAID	AMOUNT STILL OWING
b. <i>Debtor whose debts are not primarily consumer debts:</i> List each payment or other transfer to any creditor made within 90 days immediately preceding the commencement of the case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$5,475. If the debtor is an individual, indicate with an asterisk (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)			

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS/ TRANSFERS	AMOUNT PAID OR VALUE OF TRANSFERS	AMOUNT STILL OWING
Nevada State Bank P.O. Box 990 Las Vegas, NV 89125	12/31/2009, 02/18/2010, 02/25/2010	\$15,000.00	\$654,000.00

None

☐ c. *All debtors:* List all payments made within **one year** immediately preceding the commencement of this case to or for the benefit of creditors who are or were insiders. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR AND RELATIONSHIP TO DEBTOR	DATE OF PAYMENT	AMOUNT PAID	AMOUNT STILL OWING
Antonio Nevada, LLC 8880 W. Sunset Road 3rd Floor Las Vegas, NV 89148	09/24/2009	\$50,000.00	\$3,800,000.00

4. Suits and administrative proceedings, executions, garnishments and attachments

None

- ☐ a. List all suits and administrative proceedings to which the debtor is or was a party within **one year** immediately preceding the filing of this bankruptcy case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

CAPTION OF SUIT AND CASE NUMBER	NATURE OF PROCEEDING	COURT OR AGENCY AND LOCATION	STATUS OR DISPOSITION
Hugo R. Paulson, individually and as trustee of Hugo R. Paulson SEP IRA vs. Carlos Huerta, an individual; Go Global, Inc., a Nevada Corporation; Does 1 through 10; ROE Corporations 1 through 10 Case No.: CV0901910	Civil	Second Judicial District Court Washoe County, Nevada	Pending
Hugo R. Paulson as trustee of Hugo R. Paulson SEP IRA vs. Anthony Savino; Datasource, LLC, a Nevada limited liability company; Carlos Huerta, an individual; Go Global, Inc., a Nevada corporation; Does 1 through 10; ROE Corporations 1 through 10 Case No.: A9-604085-C - Conversion Case No.: A604085	Civil	District Court Clark County, Nevada	Pending
Go Global, Inc., A Nevada Corporation v John deVries, an individual; Gimme Sum Worldwide, Inc., a Nevada corporation; Gimme Sum California, Inc., a Nevada corporation; Gimme Sum Equipment, Inc., a Nevada corporation; Gimme Sum Franchise Corp., a Nevada corporation; Gimme Sum Louisiana, Inc., a Nevada corporation; Gimme Sum Marketing Fund, Inc., a Nevada corporation; Gimme Mum Minnesota, Inc., a Nevada corporation; Gimme Sum Real Estate Corp., a Nevada corporation...Case No.: A567964	Breach of Contract	Clark County, Nevada	Pending

None

- ☐ b. Describe all property that has been attached, garnished or seized under any legal or equitable process within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF PERSON FOR WHOSE BENEFIT PROPERTY WAS SEIZED	DATE OF SEIZURE	DESCRIPTION AND VALUE OF PROPERTY
Charleston Falls, LLC c/o Carlos Huerta 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	3/5/2010	Interests within Mt. Charleston View, LLC \$2,500,000.00

NAME AND ADDRESS OF PERSON FOR WHOSE
BENEFIT PROPERTY WAS SEIZED

Mountain Gaming, LLC
c/o Carlos Huerta
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

DATE OF SEIZURE
3/5/2010

DESCRIPTION AND VALUE OF
PROPERTY

Restaurant and bar operation at the top of Mt.
Charleston, Nevada.
Approximate value - \$3,000,000.00

5. Repossessions, foreclosures and returns

None

■ List all property that has been repossessed by a creditor, sold at a foreclosure sale, transferred through a deed in lieu of foreclosure or returned to the seller, within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF
CREDITOR OR SELLER

DATE OF REPOSSESSION,
FORECLOSURE SALE,
TRANSFER OR RETURN

DESCRIPTION AND VALUE OF
PROPERTY

6. Assignments and receiverships

None

■ a. Describe any assignment of property for the benefit of creditors made within **120 days** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include any assignment by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF ASSIGNEE

DATE OF
ASSIGNMENT

TERMS OF ASSIGNMENT OR SETTLEMENT

None

■ b. List all property which has been in the hands of a custodian, receiver, or court-appointed official within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning property of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS
OF CUSTODIAN

NAME AND LOCATION
OF COURT
CASE TITLE & NUMBER

DATE OF
ORDER

DESCRIPTION AND VALUE OF
PROPERTY

7. Gifts

None

■ List all gifts or charitable contributions made within **one year** immediately preceding the commencement of this case except ordinary and usual gifts to family members aggregating less than \$200 in value per individual family member and charitable contributions aggregating less than \$100 per recipient. (Married debtors filing under chapter 12 or chapter 13 must include gifts or contributions by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF
PERSON OR ORGANIZATION

RELATIONSHIP TO
DEBTOR, IF ANY

DATE OF GIFT

DESCRIPTION AND
VALUE OF GIFT

8. Losses

None

■ List all losses from fire, theft, other casualty or gambling within **one year** immediately preceding the commencement of this case **or since the commencement of this case**. (Married debtors filing under chapter 12 or chapter 13 must include losses by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

DESCRIPTION AND VALUE
OF PROPERTY

DESCRIPTION OF CIRCUMSTANCES AND, IF
LOSS WAS COVERED IN WHOLE OR IN PART
BY INSURANCE, GIVE PARTICULARS

DATE OF LOSS

9. Payments related to debt counseling or bankruptcy

- None ☐ List all payments made or property transferred by or on behalf of the debtor to any persons, including attorneys, for consultation concerning debt consolidation, relief under the bankruptcy law or preparation of the petition in bankruptcy within **one year** immediately preceding the commencement of this case.

NAME AND ADDRESS OF PAYEE	DATE OF PAYMENT, NAME OF PAYOR IF OTHER THAN DEBTOR	AMOUNT OF MONEY OR DESCRIPTION AND VALUE OF PROPERTY
The Schwartz Law Firm 701 E. Bridger Avenue, Suite 120 Las Vegas, NV 89101	03/23/2010	\$25,000.00

10. Other transfers

- None ☐ a. List all other property, other than property transferred in the ordinary course of the business or financial affairs of the debtor, transferred either absolutely or as security within **two years** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include transfers by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF TRANSFEREE, RELATIONSHIP TO DEBTOR	DATE	DESCRIBE PROPERTY TRANSFERRED AND VALUE RECEIVED
Sigmund Rogich Investor/Member	10/31/2008	Eldorado Hills, LLC interest \$2,747,729.50 debt
The Villages, LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Various	\$32,000
Ashton Inn LLC 3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Various	\$42,100.00

- None ☒ b. List all property transferred by the debtor within **ten years** immediately preceding the commencement of this case to a self-settled trust or similar device of which the debtor is a beneficiary.

NAME OF TRUST OR OTHER DEVICE	DATE(S) OF TRANSFER(S)	AMOUNT OF MONEY OR DESCRIPTION AND VALUE OF PROPERTY OR DEBTOR'S INTEREST IN PROPERTY
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11. Closed financial accounts

- None ☐ List all financial accounts and instruments held in the name of the debtor or for the benefit of the debtor which were closed, sold, or otherwise transferred within **one year** immediately preceding the commencement of this case. Include checking, savings, or other financial accounts, certificates of deposit, or other instruments; shares and share accounts held in banks, credit unions, pension funds, cooperatives, associations, brokerage houses and other financial institutions. (Married debtors filing under chapter 12 or chapter 13 must include information concerning accounts or instruments held by or for either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF INSTITUTION	TYPE OF ACCOUNT, LAST FOUR DIGITS OF ACCOUNT NUMBER, AND AMOUNT OF FINAL BALANCE	AMOUNT AND DATE OF SALE OR CLOSING
Bank of Las Vegas 6001 S. Decatur Blvd., Ste P Las Vegas, NV 89118	Checking account number ending in 4029	10/28/2009 \$569.00
Bank of Las Vegas 6001 S. Decatur Blvd., Ste P Las Vegas, NV 89118	Money market account number ending in 3111	10/28/2009 \$3,506.00

12. Safe deposit boxes

- None ☐ List each safe deposit or other box or depository in which the debtor has or had securities, cash, or other valuables within **one year** immediately preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include boxes or depositories of either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF BANK OR OTHER DEPOSITORY	NAMES AND ADDRESSES OF THOSE WITH ACCESS TO BOX OR DEPOSITORY	DESCRIPTION OF CONTENTS	DATE OF TRANSFER OR SURRENDER, IF ANY
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13. Setoffs

- None ☐ List all setoffs made by any creditor, including a bank, against a debt or deposit of the debtor within **90 days** preceding the commencement of this case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATE OF SETOFF	AMOUNT OF SETOFF
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14. Property held for another person

- None ☐ List all property owned by another person that the debtor holds or controls.

NAME AND ADDRESS OF OWNER	DESCRIPTION AND VALUE OF PROPERTY	LOCATION OF PROPERTY
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15. Prior address of debtor

- None ☐ If the debtor has moved within **three years** immediately preceding the commencement of this case, list all premises which the debtor occupied during that period and vacated prior to the commencement of this case. If a joint petition is filed, report also any separate address of either spouse.

ADDRESS	NAME USED	DATES OF OCCUPANCY
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16. Spouses and Former Spouses

- None ☐ If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within **eight years** immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state.

NAME

17. Environmental Information.

For the purpose of this question, the following definitions apply:

"Environmental Law" means any federal, state, or local statute or regulation regulating pollution, contamination, releases of hazardous or toxic substances, wastes or material into the air, land, soil, surface water, groundwater, or other medium, including, but not limited to, statutes or regulations regulating the cleanup of these substances, wastes, or material.

"Site" means any location, facility, or property as defined under any Environmental Law, whether or not presently or formerly owned or operated by the debtor, including, but not limited to, disposal sites.

"Hazardous Material" means anything defined as a hazardous waste, hazardous substance, toxic substance, hazardous material, pollutant, or contaminant or similar term under an Environmental Law

- None ☐ a. List the name and address of every site for which the debtor has received notice in writing by a governmental unit that it may be liable or potentially liable under or in violation of an Environmental Law. Indicate the governmental unit, the date of the notice, and, if known, the Environmental Law:

SITE NAME AND ADDRESS	NAME AND ADDRESS OF GOVERNMENTAL UNIT	DATE OF NOTICE	ENVIRONMENTAL LAW
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- None ☐ b. List the name and address of every site for which the debtor provided notice to a governmental unit of a release of Hazardous Material. Indicate the governmental unit to which the notice was sent and the date of the notice.

SITE NAME AND ADDRESS	NAME AND ADDRESS OF GOVERNMENTAL UNIT	DATE OF NOTICE	ENVIRONMENTAL LAW
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- None ☐ c. List all judicial or administrative proceedings, including settlements or orders, under any Environmental Law with respect to which the debtor is or was a party. Indicate the name and address of the governmental unit that is or was a party to the proceeding, and the docket number.

NAME AND ADDRESS OF GOVERNMENTAL UNIT	DOCKET NUMBER	STATUS OR DISPOSITION
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18 . Nature, location and name of business

- None ☐ a. *If the debtor is an individual*, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was an officer, director, partner, or managing executive of a corporation, partner in a partnership, sole proprietor, or was self-employed in a trade, profession, or other activity either full- or part-time within **six years** immediately preceding the commencement of this case, or in which the debtor owned 5 percent or more of the voting or equity securities within **six years** immediately preceding the commencement of this case.

If the debtor is a partnership, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was a partner or owned 5 percent or more of the voting or equity securities, within **six years** immediately preceding the commencement of this case.

If the debtor is a corporation, list the names, addresses, taxpayer identification numbers, nature of the businesses, and beginning and ending dates of all businesses in which the debtor was a partner or owned 5 percent or more of the voting or equity securities within **six years** immediately preceding the commencement of this case.

NAME	LAST FOUR DIGITS OF SOCIAL-SECURITY OR OTHER INDIVIDUAL TAXPAYER-I.D. NO. (ITIN)/ COMPLETE EIN	ADDRESS	NATURE OF BUSINESS	BEGINNING AND ENDING DATES
Go Global, Inc.	88-0432565	300 E. Post Road Ste. 110 Las Vegas, NV 89120	Real Estate Brokerage and Investment	07/29/1997-Present
BV 86, LLC		5451 South Durango Drive Las Vegas, NV 89113	Real Estate Investment Dissolved	10/2007-12/2008
Charleston Falls, LLC	20-515-7867	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	06/2006-Present
Eldorado II, LLC		3883 Howard Hughes Pkwy, #590 Las Vegas, NV 89169	Established to acquire property Dissolved	08/2007-08-2009
Mt. Charleston View, LLC	06-1758575	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	09-2005-
HPCH, LLC	06-1758580	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	09/2005-Present
Realized Gains, LLC	20-4715600	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	04/2005-03/2010
The Villages, LLC	20-4922242	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	03/2006-Present
Homestead 2001, LLC	88-0484401	3060 E. Post Road, Ste. 110 Las Vegas, NV 89120	Real Estate Investment	01/2001-Present

- None ☐ b. Identify any business listed in response to subdivision a., above, that is "single asset real estate" as defined in 11 U.S.C. § 101.

NAME
HPCH, LLC

ADDRESS
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

The Villages, LLC

3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

The following questions are to be completed by every debtor that is a corporation or partnership and by any individual debtor who is or has been, within **six years** immediately preceding the commencement of this case, any of the following: an officer, director, managing executive, or owner of more than 5 percent of the voting or equity securities of a corporation; a partner, other than a limited partner, of a partnership, a sole proprietor or self-employed in a trade, profession, or other activity, either full- or part-time.

(An individual or joint debtor should complete this portion of the statement **only** if the debtor is or has been in business, as defined above, within six years immediately preceding the commencement of this case. A debtor who has not been in business within those six years should go directly to the signature page.)

19. Books, records and financial statements

- None ☐ a. List all bookkeepers and accountants who within **two years** immediately preceding the filing of this bankruptcy case kept or supervised the keeping of books of account and records of the debtor.

NAME AND ADDRESS
Lynda Keeton CPA, LLC
375 N. Stephanie Street
Bldg. 2
Henderson, NV 89014

DATES SERVICES RENDERED
01/2010-Present

LL Bradford & Co.
8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

12/1997-Present

Shelby Keefer CPA
7201 W. Lake Mead Blvd.
Ste. 502
Las Vegas, NV 89128

04/2008-Present

- None ☐ b. List all firms or individuals who within the **two years** immediately preceding the filing of this bankruptcy case have audited the books of account and records, or prepared a financial statement of the debtor.

NAME ADDRESS
Summer Rellamas 1182 Claire Rose Avenue
Las Vegas, NV 89183

DATES SERVICES RENDERED
02/2005-09/2009

- None ☐ c. List all firms or individuals who at the time of the commencement of this case were in possession of the books of account and records of the debtor. If any of the books of account and records are not available, explain.

NAME
Lynda Keeton CPA, LLC

ADDRESS
375 N. Stephanie Street
Bldg. 2
Henderson, NV 89014

LL Bradford & Co.

8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

Shelby Keefer CPA

7201 W. Lake Mead Blvd.
Ste. 502
Las Vegas, NV 89128

- None ☐ d. List all financial institutions, creditors and other parties, including mercantile and trade agencies, to whom a financial statement was issued by the debtor within **two years** immediately preceding the commencement of this case.

NAME AND ADDRESS

Nevada State Bank
750 E. Warm Springs Road, 4th Floor
Las Vegas, NV 89119

DATE ISSUED

04/2008

City National Bank
555 South Flower Street
Los Angeles, CA 90071

06/2009

20. Inventories

None

☒ a. List the dates of the last two inventories taken of your property, the name of the person who supervised the taking of each inventory, and the dollar amount and basis of each inventory.

DATE OF INVENTORY

INVENTORY SUPERVISOR

DOLLAR AMOUNT OF INVENTORY
(Specify cost, market or other basis)

None

☒ b. List the name and address of the person having possession of the records of each of the two inventories reported in a., above.

DATE OF INVENTORY

NAME AND ADDRESSES OF CUSTODIAN OF INVENTORY
RECORDS**21 . Current Partners, Officers, Directors and Shareholders**

None

☒ a. If the debtor is a partnership, list the nature and percentage of partnership interest of each member of the partnership.

NAME AND ADDRESS

NATURE OF INTEREST

PERCENTAGE OF INTEREST

None

☐ b. If the debtor is a corporation, list all officers and directors of the corporation, and each stockholder who directly or indirectly owns, controls, or holds 5 percent or more of the voting or equity securities of the corporation.

NAME AND ADDRESS

TITLE

NATURE AND PERCENTAGE
OF STOCK OWNERSHIP

Christine Huerta

Secretary

Joseph Rainone

Treasurer

22 . Former partners, officers, directors and shareholders

None

☒ a. If the debtor is a partnership, list each member who withdrew from the partnership within **one year** immediately preceding the commencement of this case.

NAME

ADDRESS

DATE OF WITHDRAWAL

None

☒ b. If the debtor is a corporation, list all officers, or directors whose relationship with the corporation terminated within **one year** immediately preceding the commencement of this case.

NAME AND ADDRESS

TITLE

DATE OF TERMINATION

23 . Withdrawals from a partnership or distributions by a corporation

None

☒ If the debtor is a partnership or corporation, list all withdrawals or distributions credited or given to an insider, including compensation in any form, bonuses, loans, stock redemptions, options exercised and any other perquisite during **one year** immediately preceding the commencement of this case.

NAME & ADDRESS
OF RECIPIENT,
RELATIONSHIP TO DEBTORDATE AND PURPOSE
OF WITHDRAWALAMOUNT OF MONEY
OR DESCRIPTION AND
VALUE OF PROPERTY

24. Tax Consolidation Group.

None ☐ If the debtor is a corporation, list the name and federal taxpayer identification number of the parent corporation of any consolidated group for tax purposes of which the debtor has been a member at any time within **six years** immediately preceding the commencement of the case.

NAME OF PARENT CORPORATION

TAXPAYER IDENTIFICATION NUMBER (EIN)

25. Pension Funds.

None ☐ If the debtor is not an individual, list the name and federal taxpayer identification number of any pension fund to which the debtor, as an employer, has been responsible for contributing at any time within **six years** immediately preceding the commencement of the case.

NAME OF PENSION FUND

TAXPAYER IDENTIFICATION NUMBER (EIN)

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I declare under penalty of perjury that I have read the answers contained in the foregoing statement of financial affairs and any attachments thereto and that they are true and correct to the best of my knowledge, information and belief.

Date June 4, 2010Signature /s/ Carlos A. Huerta
Carlos A. Huerta
President

[An individual signing on behalf of a partnership or corporation must indicate position or relationship to debtor.]

Penalty for making a false statement: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11**

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Bankruptcy Rule 2016(b), I certify that I am the attorney for the above-named debtor and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$	<u>25,000.00</u>
Prior to the filing of this statement I have received	\$	<u>25,000.00</u>
Balance Due	\$	<u>0.00</u>

2. \$ **1,039.00** of the filing fee has been paid.
3. The source of the compensation paid to me was:
☒ Debtor ☐ Other (specify):
4. The source of compensation to be paid to me is:
☒ Debtor ☐ Other (specify):
5. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.
☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
 - b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
 - c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
 - d. [Other provisions as needed]
- See the Schwartz Law Firm's detailed retention application for a description of the monies received and fees earned.**
7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

Dated: **June 4, 2010**

/s/ Samuel A. Schwartz. Esq.
Samuel A. Schwartz. Esq. 10985
The Schwartz Law Firm
701 E. Bridger Avenue, Suite 120
Las Vegas, NV 89101
(702) 385-5544 Fax: (702) 385-2741
sam@schwartzlawyers.com

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**,
Debtor

Case No. **10-14804-BAM**

Chapter **11**

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with Rule 1007(a)(3) for filing in this chapter 11 case.

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Carlos A. Huerta 3060 E. Post Road, Ste.110 Las Vegas, NV 89120	Common Stock	1	100%

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the President of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **June 4, 2010**

Signature **/s/ Carlos A. Huerta**
Carlos A. Huerta
President

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C §§ 152 and 3571.

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**Chapter **11**

VERIFICATION OF CREDITOR MATRIX

I, the President of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **June 4, 2010****/s/ Carlos A. Huerta****Carlos A. Huerta/President**

Signer/Title

E-filed on **June 4, 2010****Samuel A. Schwartz.****Esq.**

Name

10985

Bar Code #

701 E. Bridger Avenue,**Suite 120****Las Vegas, NV 89101**

Address

(702) 385-5544

Phone Number

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**In re: **Go Global, Inc.**Case # **10-14804-BAM**Chapter **11**

Trustee

Debtor(s)

AMENDMENT COVER SHEET**Amendment(s) to the following are transmitted herewith. Check all that apply.**

- ☐ Petition (must be signed by debtor *and* attorney for debtor per Fed. R. Bankr. P. 9011)
- ☐ Summary of Schedules
- ☐ Schedule A - Real Property
- ☐ Schedule B - Personal Property
- ☐ Schedule C - Property Claimed as Exempt
- ☒ Schedule D, E, or F, and/or Matrix, and/or List of Creditors or Equity Holders
- ☒ Add/delete creditor(s), change amount or classification of debt - **\$26.00 fee required**
- ☐ Add/change address of already listed creditor, add name/address of attorney for already listed creditor, amend petition, attach new petition on converted case, supply missing document(s) - **no fee**

* Must provide diskette and comply with Local Rule 1007 if add/delete creditor or add/change address of already listed creditor

- ☐ Schedule G - Schedule of Executory Contracts & Unexpired Leases
- ☐ Schedule H - Codebtors
- ☐ Schedule I - Current Income of Individual Debtor(s)
- ☐ Schedule J - Current Expenditures of Individual Debtor(s)
- ☐ Statement of Financial Affairs

Declaration of Debtor**I (We) declare under penalty of perjury that the information set forth in the amendment(s) attached hereto is (are) true and correct to the best of my (our) information and belief.****/s/ Carlos A. Huerta****Carlos A. Huerta****Debtor's Signature****Date: June 4, 2010**

Go Global, Inc.
3060 E. Post Road #110
Las Vegas, NV 89120

Samuel A. Schwartz. Esq.
The Schwartz Law Firm
701 E. Bridger Avenue, Suite 120
Las Vegas, NV 89101

United States Trustee
300 Las Vegas Blvd. South #4300
Las Vegas, NV 89101

Dept of Employment, Training and Rehab
Employment Security Division
500 East Third Street
Carson City, NV 89713

IRS
P.O. Box 21126
DPN 781
Philadelphia, PA 19114

Nevada Dept of Taxation, BK Section
555 E. Washington Ave. #1300
Las Vegas, NV 89101

American Express
Acct No 372717347753005
PO Box 0001
Los Angeles, CA 90096-0001

Antonio Nevada, LLC
8880 W. Sunset Road
3rd Floor
Las Vegas, NV 89148

Arie Fisher
16 Rashi Street
Ra'anana, Israel 43214

Azure Seas, LLC
5024 E. Lafayette Blvd
Phoenix, AZ 85018

Bailus Cook & Kelesis
Acct No 31157
400 S. Fourth Street, Suite 300
Las Vegas, NV 89101

Bank Of America
Acct No 68181004915099
Po Box 26078
Greensboro, NC 27420

Carlos A. Huerta
3060 E. Post Road #110
Las Vegas, NV 89120

Christine H. Huerta
3060 E. Post Road #110
Las Vegas, NV 89120

City National Bank
P.O. Box 60938
Los Angeles, CA 90060-0938

Gordon & Silver
3960 Howard Hughes Pkwy
9th Floor
Las Vegas, NV 89169

HPCH, LLC
3060 E. Post Road, Ste. 110
Las Vegas, NV 89120

Hugo Paulson
5024 E. Lafayette Blvd.
Phoenix, AZ 85018

Hugo R. Paulson
5024 E. Lafayette Blvd.
Phoenix, AZ 85018

Kolesar & Leatham
3320 W. Sahara Avenue, Ste. 380
Las Vegas, NV 89102

LL Bradford & Co.
8880 W. Sunset Road, 3rd Floor
Las Vegas, NV 89148

Nevada State Bank
Acct No 0180910033179005001
P.O. Box 990
Las Vegas, NV 89125

One Cap Financial
5440 W. Sahara Avenue
3rd Floor
Las Vegas, NV 89145

Phillip M. Stone
6900 McCarran Blvd.
Ste. 2040
Reno, NV 89509

Ray Koroghli
3055 Via Sarafina Avenue
Henderson, NV 89052

Sigmund Rogich
3883 Howard Hughes Pkwy, Ste 550
Las Vegas, NV 89169

Zions Bank
Acct No 0010039798978529001
P.O. Box 25855
Salt Lake City, UT 84125

**United States Bankruptcy Court
District of Nevada**

In re **Go Global, Inc.**

Debtor(s)

Case No. **10-14804-BAM**
Chapter **11**

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Go Global, Inc.** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

■ None [*Check if applicable*]

June 4, 2010

Date

/s/ Samuel A. Schwartz. Esq.**Samuel A. Schwartz. Esq. 10985**

Signature of Attorney or Litigant

Counsel for **Go Global, Inc.****The Schwartz Law Firm****701 E. Bridger Avenue, Suite 120****Las Vegas, NV 89101****(702) 385-5544 Fax:(702) 385-2741****sam@schwartzlawyers.com**

Name, Address, Telephone No. & I.D. No.

Samuel A. Schwartz. Esq. 10985
701 E. Bridger Avenue, Suite 120
Las Vegas, NV 89101
(702) 385-5544
10985

UNITED STATES BANKRUPTCY COURT

District of Nevada

In Re

Go Global, Inc.

Debtor(s)

BANKRUPTCY NO. **10-14804-BAM**
 CHAPTER NO. **11**

**DECLARATION RE: ELECTRONIC FILING OF PETITION
 SCHEDULES, STATEMENTS AND PLAN (if applicable)**

PART I - DECLARATION OF PETITIONER

I [We] **Carlos A. Huerta** and _____, the undersigned debtor(s) hereby declare under penalty of perjury that the information I have given my attorney and the information provided in the electronically filed petition, statements, schedules, amendments and plan (if applicable) as indicated above is true and correct. I consent to my attorney filing my petition, this declaration, statements, schedules and plan (if applicable) as indicated above to the United States Bankruptcy Court. I understand that this DECLARATION RE: ELECTRONIC FILING is to be filed with the Clerk once all schedules have been filed electronically but, in no event, no later than 15 days following the date the petition was electronically filed. I understand that failure to file the signed original of this DECLARATION will cause my case to be dismissed pursuant to 11 U.S.C. § 707(a)(3) without further notice.

- ☐ If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7 or 13. I am aware that I may proceed under chapter 7, 11, 12, or 13 of 11 United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7 or 13. I request relief in accordance with the chapter specified in this petition.
- ☒ [If petitioner is a corporation or partnership] I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor. The debtor requests relief in accordance with the chapter specified in this petition.

Dated: **June 4, 2010**

Signed: **/s/ Carlos A. Huerta**
Carlos A. Huerta/President
 (Applicant)

PART II - DECLARATION OF ATTORNEY

I, the attorney for the petitioner named in the foregoing petition, declare that, I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter.

Dated: **June 4, 2010**

Signed: **/s/ Samuel A. Schwartz. Esq.**
Samuel A. Schwartz. Esq. 10985
 Attorney for Debtor(s)

Exhibit B

Bruce A. Markell

Honorable Bruce A. Markell
United States Bankruptcy Judge



Entered on Docket
April 08, 2013

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
The Schwartz Law Firm, Inc.
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Joint Administration Under
Go Global, Inc.,)	CASE NO.: 10-14804-BAM
)	
Debtor.)	CASE NO.: 10-14804-BAM
In re:)	CASE NO.: 10-14456-BAM
Carlos A. Huerta, and)	CASE NO.: 11-27226-BAM
Christine H. Huerta,)	CASE NO.: 11-28681-BAM
)	
Debtors.)	
In re:)	Chapter 11
Charleston Falls, LLC,)	
)	
Debtor.)	
In re:)	
HPCH, LLC,)	Date of Hearing: March 26, 2013
Debtor.)	Time of Hearing: 10:00 a.m.
)	

ORDER (i) APPROVING THE DISCLOSURE STATEMENT; (ii) APPROVING THE FORM OF BALLOTS AND PROPOSED SOLICITATION AND TABULATION PROCEDURES; (iii) FIXING THE VOTING DEADLINE WITH RESPECT TO THE DEBTORS' CHAPTER 11 PLAN; (iv) PRESCRIBING THE FORM AND MANNER OF NOTICE THEREOF; (v) FIXING THE LAST DATE FOR FILING OBJECTIONS TO CHAPTER 11 PLAN; (vi) SCHEDULING A HEARING TO CONSIDER CONFIRMATION OF THE CHAPTER 11 PLAN; AND (vii) APPOINTING THE SCHWARTZ LAW FIRM AS SOLICITATION AND TABULATION AGENT

1 Upon the application dated January 22, 2013 (the “**Scheduling Motion**”),¹ with the
2
3 First Amended Disclosure Statement dated January 17, 2013, and the First Amended Plan of
4 Reorganization dated January 17, 2013, of the above-captioned debtors and debtors-in-
5 possession (the “**Debtors**”), for an order, (i) approving the disclosure statement; (ii) approving
6 the form of ballots and proposed solicitation and tabulation procedures for the Plan; (iii) fixing
7 the voting deadline with respect to the Plan, (iv) prescribing the form and manner of notice
8 thereof; (v) fixing the last day for filing objections to the Plan; (vi) scheduling a hearing to
9 consider the confirmation of the Plan, and (vii) approving The Schwartz Law Firm, Inc. as the
10 Debtors’ solicitation and tabulation agent (the “**Solicitation and Tabulation Agent**”); and it
11 appearing that the Court has jurisdiction over this matter; and Hugo Paulson, individually and
12 as Trustee of the Hugo Paulson SEP-IRA (“**Paulson**”) having filed an objection to the
13 Disclosure Statement; and the Debtors having filed their Second Amended Disclosure
14 Statement and Second Amended Plan of Reorganization on March 8, 2013 to address the issues
15 raised by Paulson; and the Debtors having filing their Third Amended Disclosure Statement
16 (the “**Disclosure Statement**”) and Third Amended Plan of Reorganization (the “**Plan**”) on
17 March 28, 2013 to accommodate additional requests by Paulson; and it further appearing that
18 the relief requested in the Scheduling Motion is in the best interests of the Debtors, their
19 bankruptcy estates and their creditors; and upon all of the proceedings had before the Court;
20 and after due deliberation and sufficient cause appearing therefore, it is hereby:
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28 **ORDERED** that the Pursuant to section 1125 of the Bankruptcy Code and Rule
29 3017(b) of the Federal Rules of Bankruptcy Procedure, the Disclosure Statement, as amended,
30 is hereby approved, and it is further
31

32 ¹ All capitalized terms not otherwise defined herein have the meaning ascribed to such terms in the Scheduling Motion.

1 **ORDERED** that the Debtors shall commence solicitation of their Plan by April 8,
2 2013; and it is further

3 **ORDERED** that pursuant to Bankruptcy Rule 3017(c), May 13, 2013, shall be the last
4 date to vote to accept or reject the Plan (the “**Voting Deadline**”); and it is further

5 **ORDERED** that any replies to objections to the Plan, ballot voting summaries and any
6 confirmation hearing briefs shall be due on May 31, 2013; and it is further

7 **ORDERED** that lists of witnesses and exhibits to be used at the Confirmation Hearing
8 shall be filed by June 7, 2013; and it is further

9 **ORDERED** that a pre-trial conference shall be held on June 11, 2013 at 11:00 a.m.;
10 and it is further

11 **ORDERED** that pursuant to section 1128(a) of the Bankruptcy Code and Bankruptcy
12 Rule 3017(c), the Confirmation Hearing in these Chapter 11 cases shall be held on June 19,
13 2013, at 9:30 a.m. and June 20, 2013 at 9:30 a.m.; and it is further

14 **ORDERED** that pursuant to Bankruptcy Rules 3020(b) and 9006(c)(1), objections, if
15 any, to confirmation of the Plan shall be in writing and shall (a) state the name and address of
16 the objecting party and the nature and amount of the claim or interest of such party, (b) state
17 with particularity the basis and nature of each objection or proposed modification to the Plan
18 and (c) be filed, together with proofs of service, with the Court (with a copy delivered to
19 chambers) and served so that such objections are actually received by the parties listed below,
20 no later than May 13, 2013 (the “**Confirmation Objection Deadline**”):

21 Samuel A. Schwartz, Esq.
22 The Schwartz Law Firm
23 6623 Las Vegas Blvd. South, Suite 300
24 Las Vegas, Nevada 89119
25 Facsimile: (702) 385-2741
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1 and it is further

2 **ORDERED** that that any party failing to file and serve an objection to the Plan in
3 compliance with this Order shall be barred from raising any objections at the Confirmation
4 Hearing; and it is further

5
6 **ORDERED** that the Confirmation Hearing may be adjourned from time to time
7 without prior notice to holders of claims, holders of equity interests, or other parties in interest
8 other than the announcement of the adjourned hearing date at the Confirmation Hearing; and it
9 is further
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11
12 **ORDERED** that pursuant to Bankruptcy Rules 3018(c) and 3017(a), the form of
13 ballots, attached to the Scheduling Motion as Exhibit B are approved; and it is further

14
15 **ORDERED** that pursuant to Bankruptcy Rules 3017(c) and 3018(a), the holders of
16 claims in Classes 1, 2, 3, 4, 5, 6 and 7 of the Plan as of the Record Date (as defined in the Plan)
17 may vote to accept or reject the Plan by indicating their acceptance or rejection of the Plan on
18 the ballots provided therefore; and it is further
19

20 **ORDERED** that the provision of notice in accordance with the procedures set forth in
21 this Order and the Voting Procedures shall be deemed good and sufficient notice of the
22 Confirmation Hearing, the Voting Deadline and the Confirmation Objection Deadline; and it is
23 further
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25
26 **ORDERED** that, pursuant to Bankruptcy Rule 3017(c), but except as otherwise
27 expressly provided in the Voting Procedures, in order to be considered as acceptances or
28 rejections of the Plan, all ballots must be properly completed, executed, marked and actually
29 received by the Solicitation and Tabulation Agent on or before the Voting Deadline; and it is
30 further
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1 **ORDERED** that the Solicitation and Tabulation Agent is authorized and directed to
2 effect any action reasonably necessary to accomplish the solicitation and tabulation services
3 contemplated by the Disclosure Statement and the Voting Procedures; and it is further
4

5 **ORDERED** that the Debtors are not required to mail a Solicitation Package, an
6 Unimpaired Class Notice or a Shareholder Notice (as the case may be) to any individual or
7 entity at an address from which notice of the Disclosure Statement Hearing was returned by the
8 United States Postal Office as undeliverable, unless the Debtors or the Solicitation and
9 Tabulation Agent are provided with a more accurate address prior to the Record Date. The
10 Solicitation and Tabulation Agent shall report any undeliverable solicitation packages in its
11 ballot declaration; and it is further
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14 **ORDERED** that any entity entitled to vote to accept or reject the Plan may change its
15 vote before the Voting Deadline by casting a superseding ballot so that such superseding ballot
16 is actually received by the Solicitation and Tabulation Agent on or before the Voting Deadline;
17 and it is further
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20 **ORDERED** that creditors who timely file an objection prior to the Confirmation
21 Objection Deadline, but fail to cast a ballot prior to the Voting Deadline, may cast a ballot
22 through the time of the Confirmation Hearing in connection with the resolution of their
23 objection; and it is further
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26 **ORDERED** that the Debtors are authorized and empowered to take such other actions
27 and execute such other documents as may be necessary or appropriate to implement the terms
28 of this Order; and it is further
29

30 ///

31 ///

1 **ORDERED** that this Court shall, and hereby does, retain jurisdiction with respect to all
2 matters arising from or in relation to the implementation of this Order.
3

4
5 SUBMITTED BY:

6 THE SCHWARTZ LAW FIRM, INC.
7

8 By: /s/ Samuel A. Schwartz

9 Samuel A. Schwartz, Esq., NBN 10985

10 6623 Las Vegas Blvd. South, Suite 300

11 Las Vegas, Nevada 89119

12 Attorneys for Debtors
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SUBMISSION TO COUNSEL FOR APPROVAL PURSUANT TO LR 9021

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

_____ The court has waived the requirement set forth in LR 9021(b)(1).

_____ No party appeared at the hearing or filed an objection to the motion.

 X I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

_____ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of this order.

APPROVED: Bradley J. Stevens, Esq.

DISAPPROVED:

FAILED TO RESPOND:

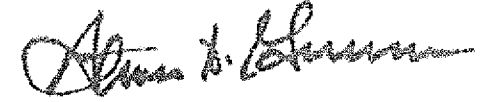
Submitted by:

THE SCHWARTZ LAW FIRM, INC.

By: /s/ Samuel A. Schwartz
Samuel A. Schwartz, Esq., NBN 10985
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Attorneys for Debtors

###

Exhibit A



CLERK OF THE COURT

1 **ORD**
2 Samuel S. Lionel, NV Bar No. 1766
3 *slionel@lionelsawyer.com*
4 LIONEL SAWYER & COLLINS
5 300 South Fourth Street, 17th Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 383-8884
8 Fax: (702) 383-8845
9 *Attorneys for Defendant*

6 **DISTRICT COURT**
7
8 **CLARK COUNTY, NEVADA**

9 CARLOS A. HUERTA, an individual;
10 CARLOS A. HUERTA as Trustee of THE
11 ALEXANDER CHRISTOPHER TRUST, a
12 Trust established in Nevada as assignee of
13 interests of GO GLOBAL, INC., a Nevada
14 corporation; NANYAH VEGAS, LLC, a
15 Nevada limited liability company,

16 Plaintiffs,

17 v.

18 SIG ROGICH aka SIGMUND ROGICH as
19 Trustee of The Rogich Family Irrevocable
20 Trust; ELDORADO HILLS, LLC, a Nevada
21 limited liability company; DOES I-X; and/or
22 ROE CORPORATIONS I-X, inclusive

23 Defendants.

24 **AND RELATED CLAIMS**

Case No. A-13-686303-C

Dept. XXVII

**ORDER GRANTING PARTIAL
SUMMARY JUDGMENT**

25
26
27
28 **ORDER GRANTING PARTIAL SUMMARY JUDGMENT**

I.

UNDISPUTED MATERIAL FACTS

1. In March 2010, Carlos Huerta, Christine H. Huerta (collectively "Huerta") and Go Global, Inc. ("Go Global") filed voluntary Bankruptcy Petitions in the United States Bankruptcy Court for the District of Nevada ("the Huerta Bankruptcy").
2. On July 22, 2013, an Order Confirming Third Amended Joint Chapter 11 Plan of Reorganization of Go Global, Inc., Carlos and Christine Huerta was duly entered in the Huerta Bankruptcy.
3. On November 7, 2012, Huerta and Go Global wrote The Rogich Family Irrevocable Trust ("Rogich Trust") claiming that because the Rogich Trust had transferred its membership interest in Eldorado Hills, LLC, it was in breach of the Purchase Agreement between the parties and offered mediation, the Purchase Agreement prerequisite to litigation.
4. On April 4, 2011, Huerta and Go Global filed a Joint Disclosure Statement in the Huerta Bankruptcy. The statement did not identify or mention the Purchase Agreement or the Rogich Trust.
5. Huerta and Go Global filed Amended Disclosure Statements on January 17, 2013, March 8, 2013 and April 8, 2013. None of those statements identify or mention the Purchase Agreement, any relationship between Huerta, Go Global and the Rogich Trust, any receivable or other indebtedness of the Rogich Trust, any liquidation analysis identifying or identifying a possible claim against the Rogich Trust. The Huerta and Go Global Plan also does not identify or mention any such information.
6. Disclosure Statements inform creditors how they will be paid and are used by creditors to determine whether or not to accept a Plan of Reorganization. The creditors of Huerta and Go Global were never informed there was a receivable from the Rogich Trust to be collected.

1 7. On November 7, 2012, when Huerta and Go Global sent their letter to the Rogich Trust,
2 Huerta and Go Global were aware that they had a claim against the Rogich Trust.

3 8. On June 18, 2013, Carlos Huerta filed a Declaration, under oath that stated in paragraph 4
4 thereof:

5 "In connection with confirmation of the Plan, I reviewed the Plan (as amended),
6 Disclosure Statement (as amended) and all related exhibits thereto. The statements in those
7 documents are true and accurate..." *N/A THIS Declaration allowed Huerta & Go Global to confirm a Ch. 11 Plan 7/22/13*

8 10. On July 30, 2013, Huerta and Go Global assigned to the Alexander Christopher Trust "all
9 money, assets or compensation remaining to be paid pursuant to the Purchase Agreement
10 or from any act of recovery seeking to enforce the obligations of the parties thereto.
11 Carlos Huerta and Christine Huerta are the grantors of said Trust and Carlos Huerta is
12 the Trustee of said Trust.

13 11. On July 31, 2013, Carlos Huerta individually and as Trustee of said Trust filed this action
14 against The Rogich Trust to recover the sum of \$2,747,729.50 allegedly due under the
15 Purchase Agreement.

16 LEGAL DETERMINATION

17 1. On November 7, 2012, Huerta and Go Global were aware that they had a claim against
18 the Rogich Trust.

19 2. The said claim was not disclosed in Huerta's and Go Global's First Amended, Second
20 Amended or Third Amended Disclosure Statements.

21 3. The said claim was not disclosed in Huerta's and Go Global's Plan or their first, second or
22 third Amendments to the Plan.

23 WHEREFORE IT IS ORDERED that The Rogich Family Irrevocable Trust's Motion for
24 Partial Summary Judgment be, and is hereby granted and the First, Second and Third claims for
25 relief of Carlos A. Huerta, individually and as Trustee of the Alexander Christopher Trust are
26 dismissed.

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AND WHEREAS on October 1, 2014, an Order Granting Partial Summary Judgment dismissing Plaintiff Nanyah Vegas', LLC's Fourth claim for relief was duly entered.

AND WHEREAS all claims for relief alleged in the Amended Complaint have been dismissed.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that the Amended Complaint herein, be, and it is, hereby dismissed.

DATED this 3 day of ^{November} ~~October~~, 2014.

Nancy L. Alif
DISTRICT COURT JUDGE

SUBMITTED:
LIONEL SAWYER & COLLINS

By: [Signature]
Samuel S. Lionel
300 S. Fourth Street, #1700
Las Vegas, NV 89101
Attorneys for Defendant

APPROVED
McDonald Law Offices, PLC

By: _____
Brandon McDonald
2505 Anthem Village Dr., Suite E-474
Henderson, NV 89052
Attorney for Plaintiffs

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IN THE SUPREME COURT OF THE STATE OF NEVADA

CARLOS A. HUERTA, AN
INDIVIDUAL; AND GO GLOBAL, A
NEVADA CORPORATION,

Appellants,

vs.

SIGMUND ROGICH aka SIG
ROGICH, AS TRUSTEE OF THE
ROGICH FAMILY IRREVOCABLE
TRUST; ELDORADO HILLS, LLC, A
Nevada limited liability company,

Respondents

Case No.: 70492 Electronically Filed
Aug 05 2016 04:21 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

OPPOSITION TO MOTION TO DISMISS APPEAL

Schwartz Flansburg PLLC
SAMUEL A. SCHWARTZ, ESQ.
Nevada Bar No. 10985
TROY P. DOMINA, ESQ.
Nevada Bar No. 13862
6623 Las Vegas Blvd. S. Suite 300
Las Vegas, Nevada 89119
(702) 385-5544
Attorneys for Appellants

1 **I. INTRODUCTION.**

2 The District Court order at issue is the result of Plaintiffs' motion for
3 relief which was brought according to the provisions of NRCP 60(b). Under
4 NRCP 60(b), the District Court order denying the motion is a special order and
5 the underlying judgment from which relief was sought is an injunction.
6 Therefore, the denial of the NRCP 60(b) motion is an appealable determination,
7 over which this Court has jurisdiction.

8 **II. FACTUAL AND PROCEDURAL HISTORY.**

9 1. On November 5, 2014, the Eighth Judicial District Court entered
10 an Order Granting Partial Summary Judgment (the "**Order**") in favor of
11 defendant Sig Rogich aka Sigmund Rogich, as Trustee of The Rogich Family
12 Irrevocable Trust ("**Rogich**"), and entered its findings of fact and conclusions
13 of law therein. See Order Granting Partial Summary Judgment, attached hereto
14 as **Exhibit A**.

15 2. The Order granted partial summary judgment to Rogich on
16 procedural grounds, namely, because the claims against Rogich were not
17 disclosed in the disclosure statement (as amended, the "**Disclosure**
18 **Statement**"), in the Plaintiffs' Chapter 11 bankruptcy case pending before the
19 United States Bankruptcy Court for the District of Nevada (the "**Bankruptcy**
20 **Case**").

21 3. Despite the District Court's findings of fact, conclusions of law,
22 and resulting Order Granting Partial Summary Judgment, it did not have
23 jurisdiction to rule whether the Disclosure Statement contained adequate

1 information, as only the Bankruptcy Court is the proper jurisdiction to
2 determine such issue. In fact, the United States Bankruptcy Court for the
3 District of Nevada expressly approved the Disclosure Statement. See Order (i)
4 Approving the Disclosure Statement; (ii) Approving the Form of Ballots and
5 Proposed Solicitation and Tabulation Procedures; (iii) Fixing the Voting
6 Deadline with Respect to the Debtors' Chapter 11 Plan; (iv) Prescribing the
7 form and Manner of Notice Thereof; (v) Fixing the Last Date for Filing
8 Objections to Chapter 11 Plan; (vi) Scheduling a Hearing to Consider
9 Confirmation of the Chapter 11 Plan; and (vii) Appointing the Schwartz Law
10 Firm as Solicitation and Tabulation Agent, at 2:28-30, Apr. 8, 2013, attached
11 hereto as **Exhibit B**. Specifically, The Bankruptcy Court did so "after due
12 deliberation and sufficient cause". Id. at 2:19-26.

13 4. Furthermore, the claim against Rogich was listed as an Account
14 Receivable on Schedule B of the Plaintiffs' bankruptcy application and it
15 appeared in the Plaintiffs' Statement of Financial Affairs. See Schedule B, at 8,
16 June 4, 2010, attached hereto as **Exhibit C**; Statement of Financial Affairs-
17 Amended, at 6, January 19, 2012, together attached hereto as **Exhibit D**.

18 5. Nevertheless, the District Court concluded the creditors of the
19 Plaintiffs in their Bankruptcy Case were never informed there were claims
20 and/or receivables from Rogich to be collected. The District Court also
21 determined that as result, creditors of the Plaintiffs were not fully informed of
22 the Plaintiffs' claims against Rogich when determining whether to accept or
23 reject the Plaintiff's Chapter 11 plan of reorganization (the "**Plan**"). Therefore,

1 the District Court granted Rogich's Motion for Partial Summary Judgment and
2 dismissed the Plaintiffs' claims.

3 6. Importantly, however, the Plan provided for payment of claims to
4 the Plaintiffs' creditors in full. In fact, on February 10, 2016, all unsecured
5 creditors of the Plaintiffs were paid in full pursuant to the terms of the Plan.
6 See Motion to Close Bankruptcy Cases and Notice of Payment in Full filed in
7 the Bankruptcy Case, attached hereto as **Exhibit E**; see also Declarations of
8 Samuel A. Schwartz and Carlos A. Huerta, attached hereto as **Exhibits F and**
9 **G**, respectively. As a result, on March 30, 2016, the Bankruptcy Court entered
10 an order closing the Plaintiffs' bankruptcy cases, and finding that all payments
11 were made in accordance with their Chapter 11 Plan and their creditors were
12 paid in full. See Bankruptcy Court Order dated March 30, 2016, p. 2, ll. 8-9,
13 attached hereto as **Exhibit H**.

14 7. At its oral ruling on October 8, 2014, the District Court stated that
15 in Chapter 11 bankruptcy, "you declare your assets and then you tell creditors
16 through a disclosure statement how you will use assets to pay creditors." See
17 October 8, 2014 Transcript, p. 2, ll. 12-14, a copy of which is attached hereto as
18 **Exhibit I**. Similarly, the District Court later stated: "[I]n the Chapter 11
19 process you have the listing of assets then you have a disclosure statement that
20 tells creditors how they will get paid and then the plan really just says how
21 much they'll get paid and when." Id. at p. 3, ll. 13-16. Finally, the District
22 Court stated the Plaintiffs' failure to list their claim against Rogich in their
23 Disclosure Statement "evidences no intention that the creditors of Go Global

1 would ever, ever have benefited from this transaction.” Id. at p. 3, ll. 22-23.

2 8. Simply put, the District Court’s granting of Rogich’s Motion for
3 Partial Summary Judgment was based solely on the failure to disclose the
4 Plaintiffs’ claim against Rogich in their Disclosure Statement, not the merits of
5 the claims. Importantly, however, the Plan provided that creditors would be
6 paid 100% of their allowed claims. On February 10, 2016, all allowed claims
7 under the Plan were paid in full. See Exhibits E through H, attached hereto.
8 With all creditors paid in full pursuant to the Plan, the failure to list the Rogich
9 claims specifically in the Disclosure Statement is irrelevant, as it had no impact
10 on creditors’ recoveries. Moreover, the Rogich claims were disclosed in the
11 bankruptcy proceedings. See Ex. C, at 8; Ex. D, at 5.

12 9. Section 1125 of the United States Bankruptcy Code requires a
13 disclosure statement to contain adequate information of a kind that would
14 enable a hypothetical reasonable investor to make an informed judgment about
15 a debtor’s plan. 11 U.S.C. § 1125. Importantly, however, “nonsubmissions of
16 disclosure statements only operate to prevent solicitations of acceptances or
17 rejections of the plan,” and that where no solicitations are made, no disclosure
18 statement is required. In re Bel Air Assocs., Ltd., 4 B.R. 168 (Bankr. W.D.
19 Okla. 1980).

20 10. As all of the Plaintiffs’ creditors were paid in full under the Plan,
21 the disclosure of the Plaintiffs’ claims against Rogich in the Disclosure
22 Statement is irrelevant. In fact, the lack of a discussion of the Plaintiffs’ claims
23 did not have any impact on the return to creditors, as they are now fully paid.

1 Importantly, the Plaintiff's claims (via the Trust) are still timely under Nevada
2 law, and should be vetted on their merits. Accordingly, the Plaintiffs brought a
3 Motion for Reconsideration or Relief from Order Granting Partial Summary
4 Judgment based on NRCP 59(e) and NRCP 60(b) on February 22, 2016 (the
5 "**Motion**"). See Pls.' Mot. for Recons. or Relief from Order Granting Mot. for
6 Partial Summ. J., at 1. Feb. 22, 2016, attached hereto as **Exhibit J**.

7 11. In the Motion, the Plaintiff's based the 60(b)(5) request for relief
8 on the fact that the Order and its purpose had been satisfied, released, or
9 discharged, and that the preclusive effect of the Order acted as an injunction
10 that was no longer equitable to prospectively apply. See Pls.' (A) Reply to
11 Defs.' Opp. to Mot. for Recons. or Relief from Order Granting Mot. for Partial
12 Summ. J.; and (B) Req. for Oral Arg., at ¶¶ 10-15, Mar. 22, 2016, attached
13 hereto as **Exhibit K**.

14 12. Notwithstanding the foregoing, the District Court denied the
15 Plaintiff's Motion on both grounds. Hence, the denial of the request for relief
16 under NRCP 60(b) is the basis for this appeal, not the request for
17 reconsideration.

18 **III. LEGAL ARGUMENT.**

19 **This Court has Jurisdiction to Hear the Appeal Because it is**
20 **a Special Order, it Acts as an Injunction, and it is a Void Judgment.**

21 11. The Nevada Rule of Appellate Procedure 3A works in conjunction
22 with NRCP 60(b) to provide the opportunity to appeal decisions that deny relief
23 based on those grounds provided in NRCP 60(b). (Compare NRCP 60(b)(5)

1 with NRAP 3A(b)(3), (b)(8)) (noting the nearly identical language used in both
2 NRCP 60(b)(5) and NRAP 3A(b)(3), and the explicit reference and application
3 to NRCP 60(b) in NRAP 3A(b)(8)).

4 12. The Nevada Supreme Court has explicit jurisdiction to hear
5 appeals from special orders entered after final judgment. NRAP 3A(b)(8). A
6 final order and the determination of its finality do not depend on its “label as an
7 ‘order’ or a ‘judgment,’ but what the ‘order’ or judgment’ substantively
8 accomplish.” Lee v. GNLV Corp., 116 Nev. 424, 427, 996 P.2d 416, 417
9 (2000). Accordingly, this Court has explicitly determined that District Court
10 orders denying an NRCP 60(b) motion for relief, (i.e. mistakes; inadvertence;
11 excusable neglect; newly discovered evidence; fraud; void judgments; satisfied,
12 released, or discharged judgments; and judgments that are no longer equitable),
13 are special orders from which appeal may be taken. Marcuse v. Del Webb
14 Communities, Inc., 123 Nev. 278, 283 n. 3, 163 P.3d , 462, 466 n. 3 (2007);
15 Holiday Inn v. Barnett, 103 Nev. 60, 63, 732 P.2d 1376, 1378-79 (1987);
16 Smilanich v. Bonanza Air Lines, 72 Nev. 10, 291 P.2d 1053 (1956).

17 13. In this case, the Plaintiffs based the Motion on NRCP 60(b), citing
18 the Order and its purpose had been satisfied, released, and discharged. Because
19 the District Court denied the Motion for Relief that was based on NRCP 60(b),
20 the denial is a special order, over which this Court has jurisdiction. See Ex. K,
21 at ¶¶ 10-15.

22 14. Similarly, an appeal may be taken from an order of a District Court
23 in a civil action that grants or refuses to grant an injunction or that dissolves or

1 refuses to dissolve an injunction. NRAP 3A(b)(3). As with determining the
2 finality of an order, regardless of its label, this Court defines a judgment based
3 on how it functions. Bally's Grand Hotel & Casino v. Reeves, 112 Nev. 1487,
4 1488, 929 P.2d 936, 937 (1996). An injunction is "a court order commanding
5 or preventing an action." Black's Law Dictionary 855 (9th ed. 2009).

6 15. Here, the Order actively prevents the Plaintiffs from pursuing a
7 claim that they would otherwise be entitled to assert against the Defendants.
8 Therefore, the Order's preventive effect makes the Order an injunction.
9 Accordingly, the preclusive effect of the Order acts as an injunction that is no
10 longer equitable to prospectively apply. See Ex. K, at ¶¶ 10-15.

11 16. Additionally, the Order is also a void judgment. The District Court
12 does not have jurisdiction or authority to determine whether the Disclosure
13 Statement filed in Bankruptcy Court pursuant to bankruptcy proceedings was
14 adequate pursuant to section 1125 of the Bankruptcy Code. Importantly, a New
15 York state court, when considering nearly identical facts, stated the following:

16 In any event, the Bankruptcy Court approved GGI's disclosure
17 statement by entering the Disclosure Statement Order, and such
18 order is res judicata as to whether GGI's disclosure statement
19 contained "adequate information" within the meaning of section
20 1125 of the Bankruptcy Code. Because Premium participated in
GGI's Chapter 11 case, and failed to challenge the Disclosure
Statement Order, Premium is precluded from collaterally attacking
the Disclosure Statement Order in this Court.

21 The Glazier Group v. Premium Supply Co., Inc., 2013 WL 1727155, *4 (N.Y.
Sup. 2013).

22 17. In this case, as in Glazier, the Bankruptcy Court had already
23 determined that the Disclosure Statement was adequate. Importantly, only

1 bankruptcy courts (or a higher court on appeal) have authority to determine
2 whether a disclosure statement contains adequate information. Indeed,
3 “whether a disclosure statement contains adequate information is governed
4 solely by the provisions of the Bankruptcy Code. Determination of the
5 adequacy of the disclosure statement and, therefore, approval of it, is within the
6 sound discretion of the bankruptcy court. . . .” In re Snyder, 56 B.R. 1007
7 (Bankr. N.D. Ind. 1986). Because the District Court lacked jurisdiction to make
8 the determination of adequacy in a bankruptcy proceeding, its Order was void.

9 18. Furthermore, the District Court’s Order is also void for which
10 relief under NRCP 60(b)(5) should have been granted because the District
11 Court failed to give full faith and credit to the Bankruptcy Court’s order, which
12 found that the Plaintiff’s Disclosure Statement contained adequate information
13 as required by 11 U.S.C. § 1125. Indeed, only the Bankruptcy Court is the
14 proper jurisdiction to hear and determine all issues relating to the adequacy of
15 information contained in the disclosure statement. 28 U.S.C. §§ 157, 1409; see
16 also The Glazier Group v. Premium Supply Co., Inc., 2013 WL 1727155, *4-5
17 (N.Y. Sup. 2013) (finding the New York state court is required to give full faith
18 and credit to the disclosure statement order of the bankruptcy court when
19 determining issues relating to the adequacy of information contained in the
20 disclosure statement). Simply put, the District Court’s Order is preempted by
21 the Bankruptcy Court order approving the Plaintiffs’ Disclosure Statement, and
22 as a result, the District Court’s Order is void.

19. As a void judgment, relief from the Order may be sought under NRCP 60(b)(4), which permits relief from void judgments. NRCP 60(b)(4). Hence, the denial is a special order under this premise too.

20. As a motion for relief under two distinct theories provided in NRCP 60(b), denial of the Motion for relief is appealable: (i) as a 60(b) ruling that constitutes a special order; and (ii) as an injunction that the court has refused to dissolve. NRCP 60(b)(4); NRCP 60(b)(5); NRAP 3A(b)(3), (b)(8). Accordingly, this Court has jurisdiction to hear the instant appeal.

CONCLUSION.

For the foregoing reasons, the denial of the Motion is an appealable determination, over which this Court has jurisdiction.

Dated this 5th day of August, 2016.

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