

IN THE SUPREME COURT OF THE STATE OF NEVADA

Supreme Court Case No. 80508

Electronically Filed
Mar 05 2020 07:28 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

HELIX ELECTRIC OF NEVADA, LLC,

Appellant,

v.

APCO CONSTRUCTION, INC., A NEVADA CORPORATION,

Respondent.

**APPENDIX TO DOCKETING STATEMENT
Volume I**

ERIC B. ZIMBELMAN, ESQ.
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Attorneys for Appellant
Helix Electric of Nevada, LLC

<u>Exhibit</u>	<u>Description</u>	<u>Bates Range</u>	<u>Volume</u>
A	Court Docket for Case No. 09A587168	Helix000001 – Helix000044	I
B	Notice of Entry of Order to Consolidate	Helix000045 – Helix000053	I
C	Consolidated Case List	Helix000054 – Helix000062	I
D			
D-1	Pleadings Related to Accuracy	Helix000063 - Helix000066	I
	Complaint Re Foreclosure filed by Accuracy Glass & Mirror Company	Helix000067 – Helix000103	I
	First Amended Complaint Re: Foreclosure	Helix000104 – Helix000119	I
	APCO's Answer to Accuracy's First Amended Complaint Re: Foreclosure	Helix000120 – Helix000135	I & II
	CAMCO's Answer and Counterclaim	Helix000136 – Helix000155	II
	Accuracy's Answer to CAMCO's Counterclaim	Helix000156 – Helix000160	II
D-2	Pleadings Related to Helix Electric of Nevada, LLC d/b/a Helix Electric	Helix000161 – Helix000163	II
	Helix Electric's Amended Statement of Facts Constituting Lien and Third-Party Complaint	Helix000164 – Helix000179	II

	APCO's Answer to Helix's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000180 – Helix000195	II
	CAMCO and Fidelity's Answer and CAMCO's Counterclaim	Helix000196 – Helix000211	II
	Notice of Entry of Granting Helix's Motion for Fees, Interest and Costs	Helix000212 – Helix000220	II
	Notice of Entry of Judgment	Helix000221 – Helix000240	II
	Notice of Entry of Judgment [As to the Claims of Helix and National Wood Products Against APCO]	Helix000241 – Helix000251	II & III
	Findings of Fact and Conclusions of Law and Order as to the Claims of Helix and Cabenetec Against APCO	Helix000252 – Helix000323	III
D-3	Pleadings Related to WRG Design, Inc.	Helix000324 – Helix000326	III
	WRG's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000327 – Helix000343	III
	APCO's Answer to Helix's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000344 – Helix000359	III
	CAMCO & FDCM's Answer and CAMCO's Third-Party Complaint	Helix000360 – Helix000380	III & IV
	Notice of Entry of Stipulation and Order of Dismissal	Helix000381 – Helix000388	IV

	WRG's Answer to CAMCO's Counterclaim	Helix000389 – Helix000393	IV
D-4	Pleadings Related to Heinaman Contract Glazing	Helix000394 – Helix000396	IV
	Heinaman's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000397 – Helix000409	IV
	CAMCO and FDCM's Answer to Heinaman's Statement of Facts and CAMCO's Counterclaim	Helix000410 – Helix000430	IV
	Notice of Entry of Order	Helix000431 – Helix000439	IV
	Notice of Entry of Judgment	Helix000440 – Helix000462	IV
	Heinaman's Answer to CAMCO's Counterclaim	Helix000463 – Helix000467	IV
D-5	Pleadings Related to Bruin Painting Corporation	Helix000468 – Helix000469	IV
	Bruin Painting's Amended Statement of Facts Constituting Amended Notice of Lien and Third-Party Complaint	Helix000470 – Helix000482	IV
	CAMCO's Answer and Counterclaim	Helix000483 – Helix000503	IV & V
	Voluntary Dismissal	Helix000503 – Helix000505	V

D-6	Pleadings Related to HD Supply Waterworks, LP	Helix000506 – Helix000508	V
	HD Supply's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000509 – Helix000526	V
	APCO's Answer to Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000527 – Helix000541	V
	Amended Answer to HD Supply & Waterworks, LP's Statement of Facts Constituting Lien and CAMCO's Third-Party Complaint	Helix000542 – Helix000548	V
	Jeff Heit Plumbing and Old Republic's Answer to HD Supply's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000549 – Helix000558	V
	Stipulation and Order to Dismiss E&E Fire Protection	Helix000559 – Helix000569	V
	Voluntary Dismissal of Platte River Insurance	Helix000570 – Helix000577	V
	Scott Financial's Answer to HD Supply's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint	Helix000578 – Helix000601	V
E	Accuracy Glass & Mirror Company's Complaint Re: Foreclosure	Helix000602 – Helix000638	V & VI

F	Accuracy Glass & Mirror Company's First Amended Complaint Re: Foreclosure	Helix000639 – Helix 000654	VI
G	Bruin Painting	Helix000655- Helix691	VI
H	HD Supply	Helix000692 – Helix000785	VI & VII
I	Heinaman	Helix000786 – Helix000857	VII & VIII
J	WRG	Helix000858 – Helix000925	VIII & IX
K	131 Nev Advance Opinion	Helix000926 – Helix000943	IX
L	Notice of Entry of Order Granting Plaintiff's Motion to Dismiss	Helix000944 – Helix000950	IX
M	Notice of Entry of Judgment [As to the Claims of Helix Electric of Nevada, LLC and Plaintiff in Intervention National Wood Products, Inc.'s Against APCO Construction, Inc.	Helix000951 – Helix961	IX
N	Notice of Entry of Judgment [As to the Claims of Helix Electric of Nevada, LLC Against CAMCO Construction Co., Inc.]	Helix000962 – Helix000981	IX
O	Notice of Entry of Judgment [As to the Claims of Heinaman Contract Glazing Against CAMCO Construction Co., Inc.)	Helix000982 – Helix001004	IX & X

P	Order Dismissing Appeal (NV Supreme Court Case No. 76276)	Helix001005 – Helix001008	X
Q	Notice of Entry of Granting Helix Electric of Nevada's Motion for Rule 54(b) Certification	Helix001009 – Helix001017	X
R	Notice of Appeal	Helix001018 – Helix1607	X & XI & XII & XIII

Dated this 5th day of March, 2020.

PEEL BRIMLEY LLP

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Helix Electric of Nevada, LLC

CERTIFICATE OF SERVICE

Pursuant to Nev. R. App. P. 25(b) and NEFCR 9(f), I certify that I am an employee of **PEEL BRIMLEY, LLP**, and that on this 3rd day of March, 2020, I caused the above and foregoing document, **APPENDIX TO DOCKETING STATEMENT**, to be served as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or
- ☒ pursuant to NEFCR 9, upon all registered parties via the Nevada Supreme Court's electronic filing system;
- ☐ pursuant to EDCR 7.26, to be sent **via facsimile**;
- ☐ to be hand-delivered; and/or
- ☐ other _____

to the attorney(s) and/or party(ies) listed below at the address and/or facsimile number indicated below:

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*Attorneys for Respondent/Cross-Appellant
APCO Construction, Inc.*

Settlement Judge:

Stephen E. Haberfeld
8224 Blackburn Ave, Suite 100
Los Angeles, CA 90048


An employee of **PEEL BRIMLEY, LLP**

EXHIBIT A

(Court Docket for Case No. 09A587168)

Court Docket for Case No. 09A587168

Case Information

09A587168 | Accuracy Glass And Mirror Co Inc. Plaintiff(s) vs. Asphalt Products Corp. Defendant(s)

Case Number	Court	Judicial Officer
09A587168	Department 13	Denton, Mark R.
File Date	Case Type	Case Status
04/07/2009	Business Court	Closed

Party

Plaintiff Accuracy Glass And Mirror Co Inc	Active Attorneys▼ Lead Attorney Peel, Richard L. Retained
Intervenor Plaintiff Bruin Painting Corp	Active Attorneys▼ Lead Attorney Peel, Richard L. Retained
	Attorney Gebhart, Michael T. Retained
	Attorney Wayment, Dallin T. Retained
Intervenor Plaintiff Heinaman Contract Glazing	Active Attorneys▼ Lead Attorney Peel, Richard L. Retained

Attorney
Wayment, Dallin T.
Retained

Attorney
Davidson, Michael
J.
Retained

Third Party Plaintiff
Heinaman Contract Glazing

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Attorney
Wayment, Dallin T.
Retained

Attorney
Davidson, Michael
J.
Retained

Intervenor Plaintiff
WRG Design, Inc.

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Attorney
Davidson, Michael
J.
Retained

Attorney
Wayment, Dallin T.
Retained

Third Party Plaintiff
WRG Design, Inc.

Active Attorneys▼

Lead Attorney
Peel, Richard L.
Retained

Attorney
Davidson, Michael
J.
Retained

Attorney
Wayment, Dallin T.
Retained

Intervenor Plaintiff
HD Supply Waterworks LP

Active Attorneys▼
Lead Attorney
Pena, Lauren A.
Retained

Intervenor Plaintiff
Interstate Plumbing and Air Conditioning LLC

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Intervenor Plaintiff
Cactus Rose Construction Inc

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Intervenor Defendant
Asphalt Products Corp

Third Party Defendant
Asphalt Products Corp

Intervenor Defendant
APCO Construction

Active Attorneys▼
Lead Attorney
Rutar Mullins,
Gwen
Retained

Attorney
Gochnour, Wade
B.
Retained

Attorney
Planet, Brandi M.
Retained

Attorney
Jefferies, John R.
Retained

Third Party Defendant
APCO Construction

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Lead Attorney
Rutar Mullins,
Gwen
Retained

Attorney
Gochnour, Wade
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Attorney
Planet, Brandi M.
Retained

Attorney
Jefferies, John R.
Retained

Intervenor Defendant
Camco Pacific Construction Company Inc

Third Party Defendant
Camco Pacific Construction Company Inc

Intervenor Defendant
Gemstone Development West Inc

Active Attorneys▼
Lead Attorney
Gilbert, Greg S.
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Attorney
Thueson, Sean D.
Retained

Third Party Defendant
Gemstone Development West Inc

Active Attorneys▼
Lead Attorney
Gilbert, Greg S.
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Attorney
Thueson, Sean D.
Retained

Intervenor Defendant
Jeff Heit Plumbing Co LLC

Active Attorneys▼
Lead Attorney
Gregory, Keith E.
Retained

Intervenor Defendant
Fidelity and Deposit Company of Maryland

Third Party Defendant
Fidelity and Deposit Company of Maryland

Intervenor Defendant
Old Republic Surety

Active Attorneys▼

Lead Attorney
Gregory, Keith E.
Retained

Intervenor Defendant
Platte River Insurance Company

Intervenor Defendant
Scott Financial Corporation

Active Attorneys▼
Lead Attorney
Meier, Glenn F
Retained

Intervenor Defendant
Asphalt Products Corp

Intervenor Defendant
APCO Construction

Active Attorneys▼
Lead Attorney
Jefferies, John R.
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Attorney
Planet, Brandi M.
Retained

Intervenor Defendant
Camco Pacific Construction Company Inc

Intervenor Defendant
Gemstone Development West Inc

Intervenor Defendant
Fidelity and Deposit Company of Maryland

Intervenor Defendant
Scott Financial Corporation

Intervenor Defendant
Camco Pacific Construction Company Inc

Intervenor Defendant
Gemstone Development West Inc

Intervenor Defendant
Fidelity and Deposit Company of Maryland

Intervenor Defendant
Scott Financial Corporation

Intervenor
Insulpro Projects Inc

Active Attorneys▼
Lead Attorney
Dobberstein, Eric
Retained

Intervenor
Cell-Crete Fireproofing of Nevada Inc

Active Attorneys▼
Lead Attorney
McCullough,
Christopher R.
Retained

Attorney
Dean, Aaron R.
Retained

Interpleader
Helix Electric Of Nevada LLC

Active Attorneys▼
Lead Attorney
Peel, Richard L.

Retained

Doing Business As
Helix Electric

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Defendant
Asphalt Products Corp

Defendant
APCO Construction

Active Attorneys▼
Lead Attorney
Rutar Mullins,
Gwen
Retained

Attorney
Gochnour, Wade
B.
Retained

Defendant
Camco Pacific Constructions Co Inc

Address
19712 MacArthur BLVD
STE 200
Irvine CA 92612

Defendant
Gemstone Development West Inc

Active Attorneys▼
Lead Attorney
Gilbert, Greg S.
Retained

Attorney
Thueson, Sean D.
Retained

Defendant
Fidelity And Deposit Co Of Maryland

Active Attorneys▼
Attorney
Siepmann, Willi H.
Retained

Attorney
Faux, Jordan
Retained

Lead Attorney
Faux, Kurt C.
Retained

Attorney
Morris, Steven L.
Retained

Defendant
Nevada Construction Services

Active Attorneys▼
Lead Attorney
Aurbach, Phillip S.
Retained

Attorney
Vlasic, Charles
Retained

Counter Defendant
Accuracy Glass & Mirror Company Inc

Active Attorneys▼
Lead Attorney
Peel, Richard L.
Retained

Counter Defendant
Dave Peterson Framing Inc

Active Attorneys▼
Lead Attorney
Truman, T. James
Retained

Attorney

Dixon, Stephen M.
Retained

Counter Defendant
Bruin Painting Corp

Counter Defendant
Masonry Group Nevada Inc

Active Attorneys▼
Lead Attorney
Pintar, Becky
Retained

Counter Claimant
Camco Pacific Construction Co Inc

Counter Claimant
Camco Pacific Construction Company Inc

Disposition Events

08/03/2009 Judgment▼

Judicial Officer
Denton, Mark R.

Judgment Type
Voluntary Dismissal

Monetary Judgment

Debtors: Camco Pacific Construction Company Inc (Intervenor Defendant), Gemstone Development West Inc (Intervenor Defendant), Fidelity & Deposit Co Of Maryland (Intervenor Defendant), Scott Financial Corporation (Intervenor Defendant)

Creditors: Bruin Painting Corp (Intervenor Plaintiff)

Judgment: 08/03/2009 Docketed: 08/05/2009

04/04/2013 Judgment ▾

Judicial Officer
Scann, Susan

Judgment Type
Order of Dismissal With Prejudice

Monetary Judgment

Debtors: E and E Fire Protection LLC (Intervenor Defendant)

Creditors: HD Supply Waterworks LP (Intervenor Plaintiff)

Judgment: 04/04/2013 Docketed: 04/12/2013

Comment: See Lead A571228 for document

Events and Hearings

04/07/2009 Complaint ▾

COMP - COMPLAINT FILED Fee \$151.00

Comment

COMPLAINT FILED Fee \$151.00

04/07/2009 Initial Appearance Fee Disclosure ▾

IAFD - INITIAL APPEARANCE FEE DISCLOSURE

Comment

INITIAL APPEARANCE FEE DISCLOSURE

04/07/2009 Notice ▼

NOTC - NOTICE OF FORECLOSURE

Comment

NOTICE OF FORECLOSURE

04/07/2009 Lis Pendens ▼

LISP - NOTICE OF LIS PENDENS

Comment

NOTICE OF LIS PENDENS

04/14/2009 Appearance ▼

APPR - HELIX ELECTRIC'S STATEMENT OF FACTS
CONSTITUTING

Comment

HELIX ELECTRIC'S STATEMENT OF FACTS CONSTITUTING
NOTICE OF LIEN AND THIRD PARTY COMPLAINT

04/14/2009 Appearance ▼

Comment

HELIXX ELECTRIC'S STATEMENT OF FACTS CONSTITUTING
NOTICE OF LIEN AND THIRD PARTY COMPLAINT

04/14/2009 Initial Appearance Fee Disclosure ▼

IAFD - INITIAL APPEARANCE FEE DISCLOSURE

Comment

INITIAL APPEARANCE FEE DISCLOSURE

04/14/2009 Lis Pendens ▼

LISP - NOTICE OF LIS PENDENS

Comment

NOTICE OF LIS PENDENS

04/21/2009 Motion to Consolidate ▼

Motion to Consolidate

Comment

APCO Construction's Motion to Consolidate with Case Nos.
A574391, A574792, A577623, A579963, A583289, A584730,
and A587168

04/24/2009 Lis Pendens ▼

Lis Pendens

Comment
Notice of Lis Pendens

04/24/2009 Statement ▼

Statement

Comment
HD Supply Waterworks' Statement of Facts Constituting A Notice
of Lien And Third Party Complaint

04/24/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

04/24/2009 Statement ▼

Statement

Comment
Bruin Painting's Statement of Facts Constituting Notice of Lien
and Third Party Complaint

04/24/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

Comment
Initial Appearance Fee Disclosure for Bruin Painting Corporation

04/24/2009 Lis Pendens ▼

Lis Pendens

Comment
Notice of Lis Pendens

04/24/2009 Affidavit of Publication ▼

Affidavit of Service

Comment
Affidavit of Publication

04/27/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

04/27/2009 Notice of Lis Pendens ▼

Notice of Lis Pendens

04/27/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment

Heinaman Contract Glazing's Statement of Facts Constituting
Notice of Lien and Third-Party Complaint

04/28/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

04/28/2009 Notice of Lis Pendens ▼

Notice of Lis Pendens

04/28/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment

WRG Design, Inc.'s Statement of Facts Constituting Notice of
Lien and Third-Party Complaint

05/01/2009 Joinder ▼

Joinder

Comment

Scott Financial Corporation' Joinder in APCO Construction's
Motion to Consolidate A574391, A574792, A579963, A583289,
A584730 and A587168

05/20/2009 Reply in Support ▼

Reply in Support

Comment

Apco Construction Reply in Support of it's Motion to Consolidate
With Case Nos A574391, A574792, A577623, A579963,
A583289, A584730, and A587168

06/10/2009 Answer to Complaint ▼

Answer to Complaint

Comment

APCO Construction's Answer to Zitting Brothers Construction
Inc's Complaint

06/18/2009 Re-Notice ▼

Renotice

Comment

Re-Notice of Hearing of Camco Pacific Construction and Fidelity and Deposit Company of Maryland's Motion to Dismiss the Third Party Complaint of David Peterson Framing, Inc.

06/23/2009 Certificate of Mailing ▼

Certificate of Mailing

Comment

Certificate of Mailing of Camco Pacific Constructions and Fidelity and Deposit Company of Marylands Re-Notice of Hearing of Motion to Dismiss the Third Party Complaint of Dave Peterson Framing Inc and Notice Thereof

06/24/2009 First Amended Complaint ▼

First Amended Complaint

Comment

First Amended Complaint Re Foreclosure

06/24/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment

HD Supply Waterworks' Amended Statement of Facts Constituting a Notice of Lien and Third-Party Complaint

06/24/2009 Amended Notice ▼

Amended Notice

Comment

Helix Electric's Amended Notice of Lis Pendens

06/24/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment

Helix Electric's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint

06/24/2009 Amended Notice ▼

Amended Notice

Comment

Heinaman's Amended Notice of Lis Pendens

06/24/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
Heinaman Contract Glazing's Amended Statement of Facts
Constituting Notice of Lien and Third-Party Complaint

06/24/2009 Amended Notice ▼

Amended Notice

Comment
WRG Design, Inc.'s Amended Notice of Lis Pendens

06/24/2009 Amended Notice ▼

Amended Notice

Comment
Bruin Painting Corporation's Amended Notice of Lis Pendens

06/24/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
Bruin Paintings Amended Statement of facts Constituting Notice
of Lien and Third Party Complaint

06/24/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
HD Supply Waterworks Amended Statement of Facts
Constituting a Notice of Lien and Third Party Complaint

06/24/2009 Amended Notice ▼

Amended Notice

Comment
HD Supply Waterworks LPs Amended Notice of Lis Pendens

06/24/2009 Notice of Lis Pendens ▼

Notice of Lis Pendens

Comment
Accuracy Glass & Mirror Company Inc's Amended Notice of Lis
Pendens

06/25/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
WRG Design, Inc.'s Amended Statement of Facts Constituting
Notice of Lien and Third-Party Complaint

06/29/2009 Order ▼

Order

Comment

Order to Consolidate this action with Case A574391, A574792, A577623, A583289, A584730, A587168, A580889 & A589195

06/30/2009 Answer ▼

Answer

Comment

Gemstone Development West Incs Answer to Statement of Facts Constituting Lien Claim by Creative Home Theatre LLC

06/30/2009 Answer ▼

Answer

Comment

Gemstone Development West Incs Answer to Buchele Incs Statement of Facts Constituting Lien

07/02/2009 Answer ▼

Answer

Comment

Apco Constructions Answer to The Pressure Grout Companys Statement of Facts Constituting Lien and Complaint in Intervention

07/02/2009 Answer ▼

Answer

Comment

Apco Constructions Answer to The Pressure Grout Companys Statement of Facts Constituting Lien and Complaint in Intervention

07/02/2009 Answer ▼

Answer

Comment

APCO Construction's Answer to Selectbuild Nevada Inc.'s Statement of Facts Constituting Lien

07/02/2009 Answer ▼

Answer

Comment

APCO Construction's Answer to Bushele, Inc.'s Statement of Facts Constituting Lien

07/02/2009 Answer ▼

Answer

Comment

APCO Construction's Answer to Ahern Rental Inc.'s First Amended Statement of Facts Constituting Lien and Complaint in Intervention

07/02/2009 Notice of Entry of Order ▼

Notice of Entry of Order

Comment

Notice of Entry of Order to Consolidate this Action with Case Nos. A574391, A574792, A577623, A583289, A584730, A587168, A580889 and A589195

07/07/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment

Statement of Facts Constituting Lien and Complaint in Intervention

07/09/2009 Summons ▼

Summons

07/09/2009 Certificate of Service ▼

Certificate of Service

Comment

Certificate of Service of Statement of Facts Constituting Lien Claim and Complaint in Intervention

07/09/2009 Acceptance of Service ▼

Acceptance of Service

07/10/2009 Statement ▼

Statement

Comment

Camco Pacific Construction Company, Inc.'s Statement of Facts and Complaint in Intervention

07/16/2009 Answer ▼

Answer

Comment
Answer of Plaintiff Ready Mix Inc to Supply Network Inc's
Statement of Facts Constituting Lien and Complaint in
Intervention

07/16/2009 Notice of Entry of Stipulation and Order ▼

Notice of Entry of Stipulation and Order

07/17/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
Patent Construction Systems A Division of Harsco Corporations
Statement of Facts Constituting Lien and Amended Complaint in
Intervention

07/21/2009 Notice of Entry of Order ▼

Notice of Entry of Order

Comment
Notice of Entry of Order Granting Tri- City Drywall Inc's Request
to Intervene

07/22/2009 Statement of Facts Constituting Lien ▼

Statement of Facts Constituting Lien

Comment
Granite Construction Company's Statement of Facts Constituting
Lien Claim and Complaint in Intervention

07/22/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

07/23/2009 Answer to Complaint ▼

Answer to Complaint

Comment
Gemstone Development West, Inc.'s Answer to Supply Network,
Inc. dba Viking Supplynet's Statement of Facts Constituting Lien
and Complaint in Intervention

07/23/2009 Answer to Complaint ▼

Answer to Complaint

Comment
Gemstone Development West, Inc.'s Answer to Atlas
Construction Supply Inc's Statement of Facts Constituting Lien
and Complaint in Intervention

07/28/2009 Notice of Change of Address ▼

Notice of Change of Address

Comment

Notice of Change of Firm's Address

07/29/2009 Answer to Complaint ▼

Answer to Complaint

Comment

Gamstone Development West, Inc's Answer to Las Vegas Pipeline, LLC's Statement of Facts Constituting Lien and Complaint in Intervention

07/30/2009 Answer ▼

Answer

Comment

ANSWER

07/30/2009 Answer ▼

Answer

Comment

Gemstone Development West, Inc.'s Answer to the Masonry Group of Nevada, Inc.'s Statement of Facts and Constituting Lien Claim and Complaint in Intervention (A571792, A574391, A574792, A577623, A580889, A583289, A584730, A587168, A589195)

07/31/2009 Summons ▼

Summons

Comment

Summons - Apco Construction

08/03/2009 Voluntary Dismissal ▼

Voluntary Dismissal of Fidelity and Deposit Company of Maryland Only from Bruin Painting Corporatio

Comment

Voluntary Dismissal of Fidelity and Deposit Company of Maryland Only from Bruin Painting Corporation's Amended Statement of Facts Constituting Notice of Lien and Third-Party Complaint Without Prejudice

08/03/2009 Summons ▼

Summons

Comment

Summons (Amended Complaint)

08/03/2009 Summons ▼

Summons

Comment

Summons (Amended Complaint)

08/05/2009 Answer ▼

Answer

Comment

APCO Constructions Answer to Granite Construction Companys
Statement of Facts Constituting Lien Claim and Complaint in
Intervention

08/06/2009 Answer to Complaint ▼

Answer to Complaint

Comment

APCO Construction's Answer to Tri-City Drywall, Inc.'s
Statement of Facts Constituting Lien and Complaint in
Intervention

08/06/2009 Answer ▼

Answer

Comment

APCO CONstructions Answer to WRG Design Incs Amended
Statement of Facts Constituting Notice of Lien and Third-Party
Complaint

08/07/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

08/07/2009 Answer ▼

Answer

Comment

Defendants Answer t HD Supply Waterworks Amended
Statement of Facts and Third-Party Complaint

08/13/2009 Summons ▼

Summons

Comment

Summons (Amended Complaint)

08/14/2009 Acceptance of Service ▼

Acceptance of Service

Comment

Acceptance of Service of Zitting Brothers Constratuion, Inc.'s
Complaint Re: Floreclosure

08/18/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

08/18/2009 Answer ▼

Answer

Comment

Club Vista Financial Services, LLC and Tharaldson Motels II,
Inc's Answer to Camco Pacific Construction Company, Inc's
Statement of Facts and Complaint in Intervention and
Counterclaim

08/21/2009 Answer ▼

Answer

Comment

Gemstone Development West, Inc.'s Answer to Fast Glass, Inc.'s
Statement of Facts Constituting Lien

08/24/2009 Notice of Bankruptcy ▼

Notice of Bankruptcy

Comment

Selectbuild Nevada, Inc.'s Notice of Bankruptcy Filing and
Automatic Stay

08/25/2009 Answer ▼

Answer

Comment

Gemstone Development West's Answer to Zitting Brothers
Construction Inc's Complaint Re: Foreclosure

08/25/2009 Answer to Amended Complaint ▼

Answer to Amended Complaint

Comment

Gemstone Development West, Inc.'s Answer to Executive
Plastering, Inc.'s First Amended Complaint

08/26/2009 Answer ▼

Answer

Comment

Defendant, Nevada Construction Services' Answer to Camco Pacific Construction Company, Inc.'s Statement of Facts and Complaint in Intervention

08/28/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

09/02/2009 Answer to Counterclaim ▼

Answer to Counterclaim

Comment

Masonry Group Nevada Inc's Answer to Club Vista Financial Services LLC and Tharaldson Motels II Inc's Counterclaim

09/03/2009 Three Day Notice of Intent to Default ▼

Three Day Notice of Intent to Default

09/08/2009 Motion to Dismiss

09/09/2009 Answer ▼

Answer

Comment

Answer to Las Vegas Pipeline LLCs Statement of Facts Constituting Lien and Complaint in Intervention and Camco Pacific Construction Companys Incs Counterclaim

09/10/2009 Answer ▼

Answer

Comment

Answer to Northstar Concrete Inc's Statement of Facts Constituting Lien and Complaint in Intervention and Camco Pacific Construction Company Inc's Counterclaim

09/10/2009 Answer ▼

Answer

Comment

Answer to Tri-City Drywall Inc's Statement of Facts Constituting Lien and Complaint in Intervention and Camco Pacific Construction Company Inc's Counterclaim

09/10/2009 Answer ▼

Answer

Comment

Answer to Dave Peterson Framing Inc's Statement of Facts
Constituting Lien and Complaint in Intervention and Camco
Pacific Construction Company Inc's Counterclaim

09/10/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

09/10/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

09/11/2009 Answer to Complaint ▼

Answer to Complaint

Comment

Answer to Accuracy Glass & Mirror Company Inc's Complaint
and Camco Pacific Construcion Inc's Counterclaim

09/11/2009 Answer to Complaint ▼

Answer to Complaint

Comment

Answer to Bruin Painting Corporation's Statement of Facts
Constituting LienThird Party Complaint and Camco Pacific
Construction Inc's Counterclaim

09/11/2009 Answer ▼

Answer

Comment

Answer to WRG Desing Inc's Statement of Facts Constituting
Lien Thrid Party Compalint and Camco Pacific Construction Inc's
Counterclaim

09/11/2009 Answer to Third Party Complaint ▼

Answer to Third Party Complaint

Comment

Answer to Heinman Contracting Glazing 's Statement of Facts
Constituting Lien Third Party Complaint and Camco Pacific
Construcion 's Counterclaim

09/18/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Dave Peterson Framing Incs Reply to Camco Pacific
Constructions

09/18/2009 Default ▾

Default

09/18/2009 Default ▾

Default

09/23/2009 Motion to Dismiss ▾

Motion to Dismiss

Comment

Plaintiff Zitting Brothers Construction Inc's Partial Motion to Dismiss Club Vista Financial Services LLC and Tharaldson Motels II Inc's Counterclaim or in the Alternative Motion for a More Definite Statement

09/23/2009 Amended Summons ▾

Amended Summons

Comment

Amended Summons

09/23/2009 Amended Summons ▾

Amended Summons

09/24/2009 Amended Summons ▾

Amended Summons

Comment

Amended Summons - Civil

09/24/2009 Amended Summons ▾

Amended Summons

09/24/2009 Amended Summons ▾

Amended Summons

09/24/2009 Amended Summons ▾

Amended Summons

Comment

Amended Summons

09/24/2009 Certificate of Mailing ▾

Certificate of Mailing

09/25/2009 Opposition to Motion to Dismiss ▼

Opposition to Motion to Dismiss

Comment

Opposition to Scott Financial Corporation Motion to Dismiss Club Vista Financial Services LLC and Tharaldson Motels II Inc's Counterclaim

09/25/2009 Answer ▼

Answer

Comment

Answer to Steel Structures, Inc. Second Amended Statement of Facts Constituting Lien and Complaint in Intervention

09/25/2009 Answer ▼

Answer

Comment

Answer to Nevada Prefab Engineers, Inc.'s Second Amended Statement of Facts Constituting Lien and Complaint in Intervention

09/25/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Reply to Club Vista Financial Services, LLC and Tharaldson Motels, II, Inc.'s Counterclaim

09/28/2009 Response ▼

Response

Comment

Response of Club Vista Financial Services, Inc., Tharaldson to Motion to Designate this Action as Complex Pursuant to NRCP 16.1(F), and Motion to Set a Discovery Conference Pursuant to NRCP 16

09/29/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Tri-City Drywall, Inc.'s Reply to Club Vista Financial Services LCC and Tharaldson Motels II, Inc.'s Counterclaim

09/29/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Inquipco's Reply to Club Vista Financial Services LCC and
Tharaldson Motel II, Inc.'s Counterclaim

09/29/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Northstar Concrete, Inc.'s Reply to Club Vista Financial Services
LCC and Tharaldson Motels II, Inc.'s Counterclaim

09/29/2009 Notice of Change of Firm Name ▼

Notice of Change of Firm Name

Comment

Notice of Change of Firm Name and Address

09/30/2009 Opposition to Motion ▼

Opposition to Motion

Comment

Camco Pacific Construction Company, Inc's Opposition to
Nevada Construction Services' Motion for Sanctions Pursuant to
NRCP 11

10/01/2009 Answer to Complaint ▼

Answer to Complaint

Comment

Gemstone Development West Inc's Answer to Complaint for
Damages and to Foreclose Mechanic's Lien

10/01/2009 Answer ▼

Answer

Comment

Gemstone Development West, Inc.'s Answer to Custom Select
Billing, Inc.'s Statement of Facts constitution Lien and Complaint
in Intervention

10/02/2009 Motion to Associate Counsel ▼

Motion to Associate Counsel

Comment

Motion to Associate Counsel Christine R. Taradash

10/02/2009 Motion to Associate Counsel ▼

Motion to Associate Counsel

Comment

Motion to Associate Counsel John T. Moshier

10/05/2009 Motion to Associate Counsel ▼

Motion to Associate Counsel

Comment

Motion to Associate Counsel Martin A. Aronson

10/09/2009 Joinder To Motion ▼

Joinder To Motion

Comment

Bradley J Scott's Joinder to Scott Financial Corporation's Motion to Dismiss Club Vista Financial Services LLC and Tharaldson Motels II Inc's Counterclaim

10/09/2009 Initial Appearance Fee Disclosure ▼

Initial Appearance Fee Disclosure

10/09/2009 Notice of Change of Address ▼

Notice of Change of Address

10/09/2009 Notice of Change of Address ▼

Notice of Change of Address

10/12/2009 Joinder ▼

Joinder

Comment

Notice of Joinder to Scott Financial Corporation's Motion to Dismiss Club Vista Financial Services, L.L.C. and Tharaldson Motels II, Inc.'s Counterclaim

10/12/2009 Answer to Counterclaim ▼

Answer to Counterclaim

Comment

Masonry Group Nevada Incs Answer to Camco Pacific Construction Incs Counterclaim

10/12/2009 Summons ▼

Summons

10/12/2009 Answer to Counterclaim ▼

Answer to Counterclaim

Comment

Cell-Crete Fireproofing of Nevada Inc's Answer to Club Vista Financial Services LLC, Tharaldson Motels II Inc and Gary D Tharaldson's Counterclaim

10/13/2009 Certificate of Mailing ▼

Certificate of Mailing

Comment

Errata to Certificate of Mailing

10/14/2009 Answer to Counterclaim ▼

Answer to Counterclaim

Comment

Answer to Club Vista Financial Services LLC and tharaldson Motels II Incs Counterclaim

10/14/2009 Reply in Support ▼

Reply in Support

Comment

Reply in Support of NCS' Motion for Sanctions Pursuant to NRCP 11

10/14/2009 Joinder To Motion ▼

Joinder To Motion

Comment

Plaintiff/Counter-Defendant Buchele, Inc.'s Joinder to Zitting Brothers Construction Inc.'s Partial Motion to Dismiss Club Vista Financial Services, LLC and Tharaldson Motels II, Inc.'s Counterclaim, or in the Alternative, Motion for a More Definite Statement

10/15/2009 Motion to Withdraw As Counsel ▼

Motion to Withdraw As Counsel

Comment

Richard A Koch's Motion to Withdraw as Counsel

10/15/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Plaintiff in Intervention Tri-County Drywall Inc's Reply to Camco Pacific Company Inc's Counterclaim

10/15/2009 Joinder ▼

Joinder

Comment

Ahern Rental Inc.'s Joinder to Scott Financial Corporation's
Motion to Dismiss Club Vista Financial Services LLC and
Tharaldson Motel II, Inc.'s Counterclaim

10/15/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Plaintiff in Intervention Northstar Concrete Incs Reply to Camco
Pacific Company Incs Counterclaim

10/15/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Eza PC dba Oz Architecture of Nevada Inc, Harsco Corporation
and Patent Construction Systems a Division of Harsco
Corporation's Reply to Counterclaim of Club Vista Financial
Services LLC and Tharaldson Motels II Inc

10/16/2009 Notice ▼

Notice

Comment

Noorda Sheet Metal Company's Notice of Joinder in Scott
Financial Corporation's Motion to Dismiss Club Vista Financial
Services, LLC and Tharaldson Motels II, Inc.'s CounterClaim

10/16/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment

Counterdefendant Granite Construction Company's Reply to
Club Vista Financial Services, LLC's Counterclaim

10/16/2009 Joinder To Motion ▼

Joinder To Motion

Comment

Dave Peterson Framing Inc's Notice of Joinder in Scott Financial
Corporation's Motion to Dismiss Club Vista Financial Services
LLC and Tharaldson Motels II Inc's Counterclaim

10/16/2009 Joinder To Motion ▼

Joinder To Motion

Comment

E & E Fire Protection LLC's Notice of Joinder in Scott Financial
Corporation's Motion to Dismiss Club Vista Financial Services
LLC and Tharaldson Motels II Inc's Counterclaim

10/16/2009 Joinder To Motion ▼

Joinder To Motion

Comment

Professional Doors and Millworks LLC's Notice of Joinder in
Scott Financial Corporation's Motion to Dismiss Club Vista
Financial Services LLC and Tharaldson Motels II Inc's
Counterclaim

10/16/2009 Joinder ▼

Joinder

Comment

Renaissance Pools & Spas, Inc.'s Joinder to Zitting Brothers
Construction, Inc.'s Partial Motion to Dismiss Club Vista
Financial Services, LLC and Tharaldson Motels II, Inc.'s
Counterclaim, or in the Alternative, Motion for a More Definite
Statement

10/19/2009 Answer to Counterclaim ▼

Answer to Counterclaim

Comment

Republic Crane Service LLC's Answer to Club Vista Financial
Services LLC and Tharaldson Motels II Inc's Counterclaim

10/21/2009 Stipulation for Dismissal ▼

Stipulation for Dismissal

Comment

A571228 Stipulation for Dismissal Without Prejudice of Count
Nine (Acting in Concert/Civil Conspiracy) Against Zitting Brothers
Construction Inc

10/21/2009 Opposition to Motion ▼

Opposition to Motion

Comment

Opposition to Renewed Motion to Clarify and to Reconsider April
6, 2009 Ruling Re: Executive Plastering Inc's Application for
Prejudgment Writ of Attachment

10/21/2009 Reply ▼

Reply

Comment

Reply of Counterdefendant John Deere Landscape Inc to
Counterclaim of Club Vista Financial Services LLC Tharaldson
Motels II Inc and Gary D. Tharaldson

10/21/2009 Certificate of Service ▼

Certificate of Service

Comment

Certificate of Service of Reply of Counterdefendant John Deere Landscape Inc To Counterclaim of Club Vista Financial Services LLC Tharaldson Motels II Inc and Gary D. Tharaldson

10/21/2009 Reply ▼

Reply

Comment

Reply of Counterdefendant Supply Network Inc, to Counterclaim of Club Vista Financial Services LLC Tharaldson Motels II Inc and Gary D Tharaldson

10/21/2009 Certificate of Service ▼

Certificate of Service

Comment

Certificate of Service of Reply of Counterdefendant Supply Netwrk Inc to Counterclaim of Club Vista Financial Services LLC, Tharaldson Motels II Inc, and Gary D Tharaldson

10/23/2009 Acceptance of Service ▼

Acceptance of Service

11/02/2009 Order Granting Motion ▼

Order Granting Motion

Comment

Order Granting Motion to Associate Counsel John Moshier

11/02/2009 Order Granting Motion ▼

Order Granting Motion

Comment

Order Granting Motion to Associate Counsel Chrisitne Taradash

11/02/2009 Order Granting Motion ▼

Order Granting Motion

Comment

Order Granting Motion to Associate Counsel Martin A Aronson

11/04/2009 Reply to Counterclaim ▼

Reply to Counterclaim

Comment
Counterdefendant Cabinetec, Inc.'s Reply to Club Vista Financial
Services, L.L.C.'s Counterclaim

11/04/2009 Motion to Withdraw As Counsel ▼

Motion to Withdraw As Counsel

11/04/2009 Answer to Complaint ▼

Answer to Complaint

Comment
Gemstone Development West Incs Answer to Uintah
Investments LLC Complaint

11/04/2009 Answer to Complaint ▼

Answer to Complaint

Comment
Gemstone Development West, Inc.'s Answer to Complaint for
Damages and to Foreclosure Mechanic's Lien

11/04/2009 Answer ▼

Answer

Comment
Gemstone Development West, Inc.'s Answer to Ready Mix, Inc.'s
Statement of Facts Constituting Lien and Complaint for
Foreclosure of Mechanic's Lien

11/05/2009 Answer ▼

Answer

Comment
Scott Financial Corporation's Answer to Hydropressure Cleaning,
Inc.'s Statement of Facts Constituting Lien and Complaint in
Intervention

11/06/2009 Motion to Amend Complaint ▼

Motion to Amend Complaint

Comment
Harsco Corporation's Proposed Second Amended Complaint in
Intervention

11/10/2009 Notice of Motion ▼

Notice of Motion

11/13/2009 Notice of Entry of Order ▼

Notice of Entry of Order

11/17/2009 Notice of Entry of Order ▼

Notice of Entry of Order

11/18/2009 Answer ▼

Answer

Comment

Scott Financial Corporation's Answer to HD Supply Waterworks'
Amended Statement of Facts Constituting a Notice of Lien and
Third Party Complaint

11/23/2009 Errata ▼

Errata

Comment

Errata to Motion to Withdraw as Counsel

11/24/2009 Answer to Complaint ▼

Answer to Complaint

Comment

Gemstone Development West, Inc.'s Answer to PCI Group,
LLC's Complaint

11/25/2009 Order Granting Motion ▼

Order Granting Motion

Comment

Order Granting Motion to Withdraw as Counsel

12/01/2009 Substitution of Attorney ▼

Substitution of Attorney

12/07/2009 Notice of Entry of Order ▼

Notice of Entry of Order

12/07/2009 Errata ▼

Errata

Comment

Errata to Affidavit in support of Motion to Withdraw as Counsel

12/09/2009 Motion to Withdraw As Counsel ▼

Motion to Withdraw As Counsel

12/09/2009 Notice of Hearing ▼

Notice of Hearing

Comment

Notice of Hearing Re Motion to Withdraw as Counsel on an
Order Shortening Time

12/16/2009 Order Granting Motion ▼

Order Granting Motion

Comment

Order Granting Harsco Corporation's Motion to Amend
Complaint in Intervention

12/18/2009 Substitution of Attorney ▼

Substitution of Attorney

12/21/2009 Order Granting Motion ▼

Order Granting Motion

Comment

to Withdraw as Counsel

12/21/2009 Notice of Entry of Order ▼

Notice of Entry of Order

12/23/2009 Motion to Withdraw As Counsel ▼

Motion to Withdraw As Counsel

12/23/2009 Amended Complaint ▼

Amended Complaint

Comment

Harsco Corporations Second Amended Complaint in Intervention

12/28/2009 Notice of Entry of Order ▼

Notice of Entry of Order

12/29/2009 Errata ▼

Errata

Comment

Errata to Motion to Withdraw as Counsel on an Order Shortening
Time

06/24/2011 Case Reassigned to Department 29 ▼

Comment

Case reassigned from Judge Kathleen E. Delaney

03/14/2016 Case Reassigned to Department 15 ▼

Comment

Reassigned From Judge Susan Scann - Dept 29

Financial

Camco Pacific Constructions Co Inc				
	Total Financial Assessment			\$223.00
	Total Payments and Credits			\$223.00
9/11/2009	Transaction Assessment			\$223.00
9/11/2009	Payment (Window)	Receipt # 2009-05043-CCCLK	Woodbury Morris and Brown LTD	(\$223.00)
Fidelity And Deposit Co Of Maryland				
	Total Financial Assessment			\$30.00
	Total Payments and Credits			\$30.00
9/11/2009	Transaction Assessment			\$30.00
9/11/2009	Payment (Window)	Receipt # 2009-05044-CCCLK	Woodbury Morris and Brown LTD	(\$30.00)
Bruin Painting Corp				
	Total Financial Assessment			\$104.00
	Total Payments and Credits			\$104.00
4/27/2009	Transaction Assessment			\$104.00

4/27/2009	Payment (Window)	Receipt # 2009- 16226- FAM	Peel & Brimley LLP	(\$104.00)
Heinaman Contract Glazing				
	Total Financial Assessment			\$104.00
	Total Payments and Credits			\$104.00
4/28/2009	Transaction Assessment			\$104.00
4/28/2009	Payment (Window)	Receipt # 2009- 16631- FAM	Peel & Brimley LLP	(\$104.00)
WRG Design, Inc.				
	Total Financial Assessment			\$104.00
	Total Payments and Credits			\$104.00
4/29/2009	Transaction Assessment			\$104.00
4/29/2009	Payment (Window)	Receipt # 2009- 17084-FAM	Peel, Richard L.	(\$104.00)

Documents

Lis Pendens
 Initial Appearance Fee Disclosure
 Lis Pendens
 Initial Appearance Fee Disclosure
 Notice of Lis Pendens
 Initial Appearance Fee Disclosure
 Notice of Lis Pendens
 Statement
 Affidavit of Service
 Statement
 Initial Appearance Fee Disclosure
 Joinder

Statement of Facts Constituting Lien
Statement of Facts Constituting Lien
Motion to Consolidate
Reply in Support
Answer to Complaint
Renotice
Certificate of Mailing
First Amended Complaint
Statement of Facts Constituting Lien
Order
Statement of Facts Constituting Lien
Statement of Facts Constituting Lien
Amended Notice
Statement of Facts Constituting Lien
Amended Notice
Amended Notice
Statement of Facts Constituting Lien
Answer
Answer
Summons
Answer
Certificate of Service
Acceptance of Service
Statement
Answer
Answer
Answer
Answer
Notice of Entry of Order
Amended Notice
Statement of Facts Constituting Lien
Answer
Amended Notice
Statement of Facts Constituting Lien
Statement of Facts Constituting Lien
Notice of Entry of Stipulation and Order
Statement of Facts Constituting Lien
Initial Appearance Fee Disclosure
Notice of Entry of Order
Notice of Lis Pendens
Notice of Change of Address

Answer
Voluntary Dismissal of Fidelity and Deposit Company of Maryland
Only from Bruin Painting Corporatio
Answer to Complaint
Summons
Summons
Summons
Answer to Complaint
Answer to Complaint
Initial Appearance Fee Disclosure
Answer
Answer
Answer
Answer to Complaint
Summons
Acceptance of Service
Answer
Initial Appearance Fee Disclosure
Answer
Notice of Bankruptcy
Answer
Answer
Answer to Amended Complaint
Answer
Initial Appearance Fee Disclosure
Answer to Counterclaim
Three Day Notice of Intent to Default
Answer
Answer
Answer
Initial Appearance Fee Disclosure
Initial Appearance Fee Disclosure
Answer
Answer
Answer to Complaint
Answer to Complaint
Answer to Third Party Complaint
Reply to Counterclaim
Default
Default
Motion to Dismiss
Amended Summons

Amended Summons
Amended Summons
Amended Summons
Amended Summons
Amended Summons
Opposition to Motion to Dismiss
Reply to Counterclaim
Certificate of Mailing
Answer
Answer
Response
Notice of Change of Firm Name
Reply to Counterclaim
Reply to Counterclaim
Reply to Counterclaim
Opposition to Motion
Motion to Associate Counsel
Motion to Associate Counsel
Answer to Complaint
Answer
Motion to Associate Counsel
Initial Appearance Fee Disclosure
Joinder To Motion
Notice of Change of Address
Answer to Counterclaim
Notice of Change of Address
Joinder
Answer to Counterclaim
Summons
Certificate of Mailing
Answer to Counterclaim
Motion to Withdraw As Counsel
Reply to Counterclaim
Reply to Counterclaim
Reply to Counterclaim
Reply to Counterclaim
Notice
Joinder
Joinder To Motion
Joinder To Motion
Joinder To Motion

Answer to Counterclaim
Joinder To Motion
Reply in Support
Opposition to Motion
Stipulation for Dismissal
Reply
Certificate of Service
Reply
Certificate of Service
Acceptance of Service
Joinder
Order Granting Motion
Order Granting Motion
Order Granting Motion
Motion to Withdraw As Counsel
Reply to Counterclaim
Answer to Complaint
Answer
Answer to Complaint
Motion to Amend Complaint
Answer
Notice of Motion
Notice of Entry of Order
Notice of Entry of Order
Answer
Errata
Order Granting Motion
Answer to Complaint
Motion to Withdraw As Counsel
Notice of Hearing
Errata
Notice of Entry of Order
Order Granting Motion
Notice of Entry of Order
Order Granting Motion
Motion to Withdraw As Counsel
Amended Complaint
Substitution of Attorney
Notice of Entry of Order
Substitution of Attorney
Errata

COMP - COMPLAINT FILED Fee \$151.00

IAFD - INITIAL APPEARANCE FEE DISCLOSURE

NOTC - NOTICE OF FORECLOSURE

LISP - NOTICE OF LIS PENDENS

APPR - HELIX ELECTRIC'S STATEMENT OF FACTS
CONSTITUTING

IAFD - INITIAL APPEARANCE FEE DISCLOSURE

LISP - NOTICE OF LIS PENDENS

EXHIBIT B

(Notice of Entry of Order to Consolidate)

Electronically Filed
07/02/2009 11:10:30 AM

Edna H. Smith
CLERK OF THE COURT

1 NOE
2 HOWARD & HOWARD ATTORNEYS PLLC
3 Gwen Mullins, Esq.
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6 Nevada Bar No. 6314
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11 Facsimile (702) 567-1568
12 E-mails: grm@h2law.com
13 wbg@h2law.com
14 Attorneys for APCO Construction

DISTRICT COURT
CLARK COUNTY, NEVADA

12 APCO CONSTRUCTION, a Nevada
13 corporation,

14 Plaintiff,

15 vs.

16 GEMSTONE DEVELOPMENT WEST, INC.,
17 a Nevada corporation; NEVADA
18 CONSTRUCTION SERVICES, a Nevada
19 corporation; SCOTT FINANCIAL
20 CORPORATION, a North Dakota
21 corporation; COMMONWEALTH LAND
22 TITLE INSURANCE COMPANY; FIRST
23 AMERICAN TITLE INSURANCE
24 COMPANY; and DOES I through X,

25 Defendants.

26 AND ALL RELATED CASES AND
27 MATTERS.

28 PLEASE TAKE NOTICE that an ORDER TO CONSOLIDATE THIS ACTION WITH
CASE NOS. A574391, A574792, A577623, A583289, A584730, A587168, A580889 AND

CASE NO.: A571228
DEPT. NO.: X

NOTICE OF ENTRY OF ORDER TO
CONSOLIDATE THIS ACTION WITH
CASE NOS. A574391, A574792, A577623,
A583289, A584730, A587168, A580889
AND A589195

09A587168
250445



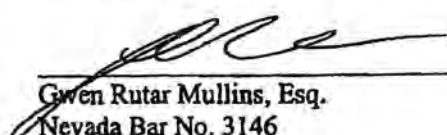
Howard & Howard Attorneys PLLC
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1 A589195 was entered herein on the 29th day of June, 2009, a copy of which is attached hereto
2 and made a part hereof.

3 Dated this 2nd day of July, 2009.

4 HOWARD & HOWARD ATTORNEYS PLLC

5
6 
7 Gwen Rutar Mullins, Esq.
8 Nevada Bar No. 3146
9 Wade B. Gochmour, Esq.
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11 3800 Howard Hughes Parkway, #1400
12 Las Vegas, Nevada 89169-591

13 **CERTIFICATE OF MAILING**

14 On the 2nd day of July, 2009, the undersigned served a true and correct copy of the
15 foregoing ORDER TO CONSOLIDATE THIS ACTION WITH CASE NOS. A574391,
16 A574792, A577623, A583289, A584730, A587168, A580889 AND A589195, by U.S. Mail,
17 postage prepaid, upon the following:

18 Gregory S. Gilbert, Esq.
19 Sean D. Thueson, Esq.
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24 Inc.

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34 P.C. dba OZ Architecture of Nevada, Inc.

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16 Peterson Framing, Inc., E&E Fire Protection,
17 LLC, Professional Door and Millworks, LLC*

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17 Willi H. Siepmann, Esq.
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25 Mark M. Jones, Esq.
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Gwen Rutar Mullins
Wade B. Gochnour, Esq.
HOWARD & HOWARD
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Las Vegas, Nevada 89169
Attorneys for Hydropressure

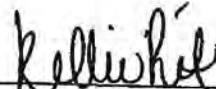
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- | | | |
|----|--|---|
| 1 | Joseph G. Went, Esq. | Ronald S. Sofen, Esq. |
| 2 | Georlen K. Spangler, Esq. | Becky A. Pintar, Esq. |
| 3 | KOLESAR & LEATHAM, CHTD. | GIBBS, GIDEN, LOCHER, TURNER & SENET LLP |
| 4 | 3320 W. Sahara Avenue, Ste. 380 | 3993 Howard Hughes Pkwy, Ste. 530 |
| 5 | Las Vegas, Nevada 89102 | Las Vegas, Nevada 89169-5994 |
| 6 | <i>Attorneys for Uintah Investments, LLC, d/b/a</i> | <i>Attorneys for The Masonry Group</i> |
| 7 | <i>Sierra Reinforcing</i> | |
| 8 | Brian K. Berman, Esq. | Eric Dobberstein, Esq. |
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| 10 | Las Vegas, Nevada 89101 | DOBBERSTEIN & ASSOCIATES |
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| 22 | Las Vegas, Nevada 89121 | MULE & VARRICCHIO |
| 23 | <i>Attorneys for Republic Crane Services, LLC</i> | 1320 S. Casino Center Blvd. |
| 24 | | Las Vegas, NV 89104 |
| 25 | Matthew Q. Callister, Esq. | <i>Attorneys for John Deere Landscaping, Inc.</i> |
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| 28 | Las Vegas, NV 89101 | WOODBURY MORRIS & BROWN |
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| | | Henderson, NV 89074 |
| | | <i>Attorneys for CAMCO Pacific</i> |
| | Michael M. Edwards, Esq. | |
| | Reuben H. Cawley, Esq. | James E. Shapiro, Esq. |
| | LEWIS BRISBOIS BISGAARD & SMITH | GERRARD, COX & LARSEN |
| | 400 South Fourth Street, Ste. 500 | 2450 St. Rose Parkway, Ste. 200 |
| | Las Vegas, Nevada 89101 | Henderson, Nevada 89074 |
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10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 APCO CONSTRUCTION, a Nevada
13 corporation,

14 Plaintiff,

15 vs.

16 GEMSTONE DEVELOPMENT WEST, INC.,
17 a Nevada corporation; NEVADA
18 CONSTRUCTION SERVICES, a Nevada
19 corporation; SCOTT FINANCIAL
20 CORPORATION, a North Dakota
21 corporation; COMMONWEALTH LAND
22 TITLE INSURANCE COMPANY; FIRST
23 AMERICAN TITLE INSURANCE
24 COMPANY; and DOES I through X,

25 Defendants.

24 **AND ALL RELATED CASES AND**
25 **MATTERS.**

FILED

2009 JUN 29 A 9 38

E. J. Smith
CLERK OF THE COURT

CASE NO.: A571228
DEPT. NO.: X

**ORDER TO CONSOLIDATE THIS
ACTION WITH CASE NOS. A574391,
A574792, A577623, A583289, A584730,
A587168, A580889 AND A589195**

Date: June 3, 2009
Time: 9:00 a.m.

26 This matter having come before this Court for a hearing on APCO Construction's
27 Motion To Consolidate With Case Nos. A574391, A574792, A577623, A579963 A583289,
28 A584730, A580889 and A587168 and on the Supplement to APCO's Construction's Motion to

Howard & Howard Attorneys PLLC
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1 Consolidate to Include Case No. A589195 In Consolidation ("Motion") on June 3, 2009 at
2 9:00 a.m. Plaintiff APCO CONSTRUCTION, appearing by and through Wade B. Gochmour,
3 Esq. of the law firm of HOWARD & HOWARD ATTORNEYS PLLC, Defendant SCOTT
4 FINANCIAL CORPORATION appearing by and through Mark M. Jones, Esq. of the law firm
5 of KEMP, JONES & COULTHARD, LLP, as counsel of record in the Club Vista action
6 (A579963) and by and through Glenn F. Meier, of the law firm of MEIER & FINE, as counsel
7 of record in this action, Lien Claimant ATLAS CONSTRUCTION SUPPLY, INC., appearing
8 by and through its counsel David W. Dachelet, Esq. of the law firm of FENNEMORE CRAIG
9 P.C., and other counsel appearing, and the Court having heard the arguments of counsel and
10 further

11 considered all the papers and pleadings filed in this action, and other good cause appearing
12 therefore,

13 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that APCO Construction's
14 Motion is hereby granted in part and denied in part.

15 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the lien foreclosure
16 cases that have been filed relating to the Manhattan West mixed-use development project,
17 namely cases identified by Case Nos. A574391, A574792, A577623, A583289, A584730,
18 A587168, A580889 AND A589195 be and hereby are consolidated with this case, Case No.
19 A571228.

20 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that APCO
21 Construction's request to consolidate the case entitled *Club Vista Financial Services, LLC et.*
22 *al. v. Scott Financial Corporation, Bradley Scott, et. al.*, Case No. A579963 is denied without
23 prejudice at this time and as such Case No. A579963 shall not be consolidated with Case No.
24 A571228 at this time.

25 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this matter
26 (A571228) and all cases consolidated with this matter be and hereby are transferred to the
27 Business Court.
28

Howard & Howard Attorneys PLLC
3800 Howard Hughes Pkwy., Suite 1400
Las Vegas, NV 89169
(702) 257-1483

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any lien foreclosure
2 action relating to the Manhattan West mixed-use development Project that is or was pending as
3 of June 3, 2009 or that is filed after the hearing on this Motion, shall be automatically
4 consolidated with Case No. A571228, by any party simply filing a Notice of Consolidation
5 with the Court.

6 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that in interest of judicial
7 economy, the requirements of NRCP Rule 24 are hereby waived and that any person or entity
8 that has an alleged lien against the Manhattan West mixed-use development Project and that
9 files a timely Statement of Facts Constituting Lien and Complaint In Intervention becomes a
10 proper party in this action without having to file a motion and/or stipulation to intervene.

11 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the consolidation of
12 the lien foreclosure action A574792 with Case No. A571228 does not affect lien claimant
13 Ahern Rentals, Inc.'s Judgment by Default dated April 14, 2009.

14
15 DATED this 24 day of June, 2009.

16
17 Justy Walsh
18 DISTRICT COURT JUDGE

19
20 Respectfully Submitted By:

21 **HOWARD & HOWARD ATTORNEYS PLLC**

22
23 [Signature]
24 Gwen Rutar Mullins, Esq.
25 Nevada Bar No. 3146
26 Wade B. Gochnour, Esq.
27 Nevada Bar No. 6314
28 3800 Howard Hughes Pkwy., Suite 1400
Las Vegas, NV 89169

Attorneys for APCO Construction

EXHIBIT C

(Consolidated Case List)

MANHATTAN WEST CONSOLIDATED CASES

Case No. 08-A-571228

Helix000055

<u>Role</u>	<u>Party Name</u>
<u>Original Plaintiff</u>	APCO Construction
	Gemstone Development West, Inc
	Nevada Construction Services
<u>Original Defendants:</u>	Scott Financial Corporation
	Commonwealth Land Title Insurance Company
	First American Title Insurance Company
<u>Plaintiff/Intervenor</u>	Pape Material Handling dba Pale Rentals
<u>Defendants</u>	Gemstone Development West
	Employers Mutual Casualty Company
<u>Lien Claimant/Intervenor</u>	Arch Aluminum and Glass Co.
	Gemstone Development West
	Gemstone Apache, LLC
<u>Defendants</u>	Nevada Construction Services
	Scott Financial Corporation
	Commonwealth Land Title Insurance Company
	First American Title Insurance Company
<u>Lien Claimant/Plaintiff-in-Intervention</u>	CAMCO Pacific Construction
	Gemstone Development West, Inc.
	a Nevada limited
<u>Defendants</u>	Alex Edelstein
	Nevada Construction Services
	Scott Financial Corporation
	Commonwealth Land Title Insurance Company
	First American Title Insurance Company;
	Club Vista Financial Services, L.L.C.
	Tharaldson Motels II, Inc.
<u>Counterclaimants</u>	Club Vista Financial Services, LLC
	Tharaldson Motels II, Inc.
	Gary D. Tharaldson
	Asphalt Products Corporation d/b/a APCO Construction
	Gemstone Development West
	Scott Financial Corporation
	Bradley J. Scott
<u>Counter-Defendants</u>	Bank of Oklahoma, N.A.
	Nevada Construction Services
	Camco Pacific Construction, Inc.
	Insulpro Projects, Inc.
	Cabinetec, Inc.
	EZA, P.C. d/b/a OZ Architecture of Nevada Inc.
	Hydro Pressure Cleaning, Inc.
	Ahern Rentals Inc.
	Arch Aluminum and Glass Co.
	Cell-Crete Fireproofing of Nevada Inc.

MANHATTAN WEST CONSOLIDATED CASES

Helix000056

Dave Peterson Framing Inc.	E & E Fire Protection LLC
Granite Construction Company	Harsco Corporation
INQUIPCO	Nevada Prefab Engineers Inc.
Noorda Sheet	Metal Company
Patent Construction Systems, a Division of Harsco Corporation	The pressure Grout Company
Professional Door and Mill Works, LLC	Steel Structures Inc.
Tri-City Drywall Inc.	Accuracy Glass & Mirror Company, Inc.
Concrete Visions Inc.	Las Vegas Pipeline LLC
Atlas Construction Supply Inc.	Ferguson Fire and Fabrication Inc.
John Deere Landscape	Creative Home Theatre, LLC
Executive Plastering Inc.	Republic Crane Service LLC
Selectbuild Nevada Inc.	Uintah Investments LLC
GLASS, Inc.	Masonry Group Nevada, Inc.
Ready Mix, Inc.	Zitting Brothers Construction, Inc.
Supply Network Inc. d/b/a Viking Supplynet	Helix Electric of Nevada LLC d/b/a Helix Electric
HD Supply Waterworks LP	Heinaman Contract Glazing
WRG Design, Inc.	Pape Materials Handling d/b/a Pape Rents
Buchele, Inc.	Renaissance Pools & Spas, Inc.
Northstar Concrete, Inc.	Bruin Painting Corporation

<u>Plaintiff</u>	Ahern Rentals	
	Gemstone Development West	Accuracy Glass & Mirror Company, Inc.
	APCO Construction	Alex Edelstein
<u>Defendants</u>	Kelley Marsja	Employers Mutual Casualty Company
	Commonwealth Land Title Insurance company	Heinaman Contract Glazing
	CAMCO Pacific Construction Company	

<u>Plaintiff/Intervenor</u>	Las Vegas Pipeline	
	APCO Construction	Gemstone Development West
	CAMCO Pacific Construction Company	
<u>Counter-Plaintiff</u>	CAMCO Pacific Company, Inc.	
<u>Counter-Defendant</u>	Las Vegas Pipeline, LLC	

<u>Plaintiff in Intervention</u>	Atlas Construction Supply
---	---------------------------

MANHATTAN WEST CONSOLIDATED CASES

<u>Plaintiff in Intervention</u>	Masonry Group Nevada	
<u>Plaintiff in Intervention</u>	Granite Construction Company	
<u>Plaintiff in Intervention</u>	Patent Construction Systems	
<u>Plaintiff in Intervention</u>	Hydropressure Cleaning, Inc.	
<u>Defendant</u>	Scott Financial Corporation	Nevada Construction Services
<u>Plaintiff in Intervention</u>	Executive Plastering, Inc.	
<u>Plaintiff in Intervention</u>	Ready Mix	Statement of Facts Constituting Lien and Complaint-in-Intervention
<u>Plaintiff in Intervention</u>	Custom Select Billing, Inc.'s	Statement of Facts Constituting Lien and Complaint-in-Intervention
<u>Defendants</u>	Scott Financial Corporation	
<u>Plaintiff in Intervention</u>	Supply Network dba Viking Supplynets	
<u>Defendant</u>	Scott Financial Corporation	
<u>Lien Claimant/Intervenor</u>	WRG Design Inc.'s	
	Asphalt Products Corp.	APCO Construction
<u>Defendants</u>	CAMCO Pacific Construction Company	Gemstone Development West
	Fidelity and Deposit of Maryland	Scott Financial Corporation
Case No. 08-A-574391-C		
<u>Plaintiff</u>	Atlas Construction Supply, Inc.	
<u>Defendant</u>	Concrete Visions	Juan S. Pulido
	Gemstone Development West, Inc.	Nevada Construction Services
	CAMCO Pacific Construction Company, Inc.	
<u>Counter-Defendant</u>	Masonry Group Nevada, Inc. aka Juan Sanchez Pulido	
<u>Intervenor</u>	Insulpro Projects, Inc.	Cell-Crete Fireproofing of Nevada, Inc.
Case No. 08-A-574792-C		

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MANHATTAN WEST CONSOLIDATED CASES

<u>Plaintiff</u>	Ahern Rentals, Inc.	
<u>Defendant</u>	Concrete Visions, Inc.	Gemstone Development West, Inc.
	Platte River Insurance Company	Nevada Construction Services
	CAMCO Pacific Construction Company, Inc.	
<u>Cross Claimant</u>	Platte River Insurance Company	
<u>Cross-Defendant</u>	Concrete Vision, Inc.	Selina Cisneros
<u>Counter-Defendant</u>	Masonry Group Nevada, Inc.	
<u>Intervenor</u>	Insulpro Projects, Inc.	
<u>Intervenor</u>	Cell-Crete Fireproofing of Nevada, Inc.	

Helix000058

Case No. 08-A-577623-C

<u>Plaintiff</u>	Ready Mix, Inc.	
<u>Defendant</u>	Gemstone Development West, Inc.	Selina M. Cisneros
	Juan S. Pulido	APCO Construction, Inc.
	Platte River Insurance Company	Nevada Construction Services
	Continental Casualty Company	
<u>Claimant</u>	Supply Network, Inc.	
<u>Counter-Defendant</u>	Masonry Group Nevada, Inc.	
<u>Intervenor Plaintiff</u>	HD Supply Waterworks LP	
<u>Intervenor Defendant</u>	APCO Construction	CAMCO Pacific Construction Company
	Gemstone Development West, Inc.	Jeff Heit
	E&E Fire Protection	Fidelity and Deposit Company of Maryland
	Old Republic Surety	Platte River Insurance Company
	Scott Financial Corporation	Cell-Crete Fireproofing of Nevada, Inc.
	Concrete Visions, Inc.	

Case No. 09-A-580889-C

<u>Plaintiff</u>	Executive Plastering, Inc.	
<u>Defendant</u>	CAMCO Pacific Construction Co., Inc.	Gemstone Development West, Inc.
<u>Counter-Claimant</u>	CAMCO Pacific Construction Co., Inc.	
<u>Counter-Defendant</u>	Executive Plastering, Inc.	Masonry Group Nevada, Inc.
<u>Intervenor</u>	Cell-Crete Fireproofing of Nevada, Inc.	
<u>Intervenor Defendant</u>	Alex Edelsein	Nevada Construction Services
	Scott Financial Corporation	Commonwealth Land Title Insurance Company

MANHATTAN WEST CONSOLIDATED CASES

	First American Title Insurance Company	Club Vista Financial Services, LLC
	Tharaldson Motels II, Inc.	
Case No. 09-A-583289-C		
<u>Plaintiff</u>	Uintah Investments, LLC dba Sierra Reinforcing	
<u>Defendants</u>	Scott Financial Corporation	APCO Construction
	Gemstone Development	
<u>Lien Claimant</u>	Ferguson Fire & Fabrication, Inc.	
<u>Defendants</u>	Gemstone Development West, Inc.	CAMCO Construction
<u>Counter-Claimant</u>	CAMCO Pacific Construction Company, Inc.	
<u>Counter-Defendants</u>	Ferguson Fire & Fabrication, Inc.	
<u>Lien Claimant/Intervenor</u>	Republic Crane Service	
<u>Respondents</u>	APCO Construction	Gemstone Development West
<u>Lien Claimant/Intervenor</u>	Renaissance Pools & Spas, Inc.	
<u>Respondents</u>	Gemstone Development West	
<u>Lien Claimant</u>	Buchele, Inc.	
<u>Lien Claimant/Intervenor</u>	Insulpro	
Case No. 09-A-584730-C		
<u>Plaintiff</u>	The Masonry Group Nevada	
<u>Defendants</u>	CAMCO Pacific Construction Company, Inc.	Gemstone Development West, Inc.
	Fidelity and Deposit Company of Maryland	
<u>Lien Claimant</u>	Fast Glass, Inc.	
<u>Third-Party Defendants</u>	CAMCO Pacific Construction Company	Gemstone Development West
	Fidelity and Deposit of Company of Maryland	
<u>Counterclaimant</u>	CAMPCO Pacific Construction Company	
<u>Counter-Defendant</u>	The Masonry Group Nevada	

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MANHATTAN WEST CONSOLIDATED CASES

Case No. 09-A-587168-C

<u>Plaintiff</u>	Accuracy Glass & Mirror Company, Inc.	
	Asphalt Products Corp.	APCO Construction
<u>Defendants</u>	CAMCO Pacific Construction Company	Gemstone Development West
	Fidelity and Deposit Company of Maryland	Scott Financial Corporation
<u>Plaintiff in Intervention</u>	Helix Electric of Nevada dba Helix Electric	
	Asphalt Products Corp.	APCO Construction
<u>Defendants in Intervention</u>	CAMCO Pacific Construction Company, Inc.	Gemstone Development West, Inc.
	Fidelity and Deposit Company of Maryland	Scott Financial Corporation
<u>Counter-Claimant</u>	CAMCO Pacific Construction Company, Inc.	
<u>Counter-Defendants</u>	Helix Electric of Nevada, LLC dba Helix Electric	

Helix000060

Case No. 09-A-589195-C

<u>Plaintiff</u>	Zitting Brothers Construction	
<u>Defendants</u>	Gemstone Development West	APCO Construction

?

Case No. 08A589662-C

<u>Plaintiff</u>	Olson Precast Company	
<u>Defendants</u>	Longford Southern Hills II, LLC	Penney Construction, LLC
	Affordable Concepts	
<u>Plaintiff</u>	Ahern Rentals, Inc.	
	Longford Southern Hills II, LLC	Penney Construction, LLC
<u>Defendants</u>	William Penney dba Penney Construction,	William Penney
	Old Republic Surety	

✓

Case No. 09-A-595552-C

<u>Plaintiff</u>	Containment Solutions	
<u>Defendants</u>	E&E Fire Protection LLC	Platte River Insurance Company
	Gemstone Development West, Inc.	CAMCO Pacific Construction Company, Inc.

MANHATTAN WEST CONSOLIDATED CASES

Case No. A-09-597089-C

<u>Plaintiff</u>	Buchele, Inc.	
<u>Defendants</u>	Gemstone Development West, Inc.	Gemstone Apache, LLC
	CAMCO Pacific Construction Company, Inc.	Masonry Group Nevada, Inc.

Helix000064

Case No. A-09592826-C

<u>Plaintiff</u>	Wiss, Janney, Elstner Associates, Inc.
<u>Defendants</u>	Gemstone Development West LL

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Case No. A-09-584960-C

<u>Plaintiff</u>	PCI Group, LLC	Unable to locate this case in Odyssey
<u>Defendants</u>	Gemstone Development West, Inc.	Gemstone Development LLC
	Gemstone Development West, LLC	

✓

Case No. A-09-589677-C

<u>Plaintiff</u>	Graybar Electric Company	
<u>Defendants</u>	Helix Electric, Inc.	Travelers Casualty & Surety Company of America
	Gemstone Development West	

✓

Case No. A-09-590319-C

<u>Plaintiff</u>	HD Supply Construction Supply, L.P. dba White Cap Construction Supply	
<u>Defendants</u>	Gemstone Development West, Inc.	Gemstone Development LLC
	Alexander Edelstein	Jane doe Edelstein
	CAMCO Pacific Construction Company, Inc.	Scott Financial Corporation

✓

Case No. A-09-596924-C

<u>Plaintiff</u>	Ha Fabricators, Inc.	
<u>Defendants</u>	APCO Construction	Gemstone Apache, LLC
<u>Counter-Claimant</u>	APCO Construction	
<u>Counter-Defendant</u>	HA Fabricators	
<u>Third Party Plaintiff</u>	APCO Construction	

✓

MANHATTAN WEST CONSOLIDATED CASES

Third Party Defendant

Gemstone Development West, Inc.

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EXHIBIT D

Helix000063

EXHIBIT D-1
(Pleadings Related to
Accuracy Glass & Mirror Company, Inc.)

Helix000064

ACCURACY GLASS & MIRROR v. APCO CONSTRUCTION, ET AL.
Case No. 09A587168

<u>Role in Case</u>	<u>Party Name</u>
Original Plaintiff	Accuracy Glass & Mirror Company Inc.
Original Defendant	APCO Construction ("APCO")
Original Defendant	CAMCO Pacific Construction Company, Inc. ("CAMCO")
Original Defendant	Gemstone Development West, Inc. ("Gemstone")
Original Defendant	Fidelity and Deposit Company of Maryland ("FDCM")
Defendant	Scott Financial Corporation

<u>Causes of Action</u>		<u>Party Name</u>	<u>Disposition</u>
Substantially identical claims to Helix's Statement of Facts Constituting Lien and Complaint-in-Intervention			Notice of Entry of Order Granting Plaintiff's Motion to Dismiss filed September 21, 2017
First Cause of Action	Breach of Contract	APCO	All claims/action dismissed
Second Cause of Action	Breach of Contract	CAMCO	All claims/action dismissed Answer and Counterclaim filed September 11, 2009
Third Cause of Action	Breach of Implied Covenant of Good Faith and Fair Dealing	APCO	All claims/action dismissed Answer filed August 5, 2009
Fourth Cause of Action	Breach of Implied Covenant of Good Faith and Fair Dealing	CAMCO	All claims/action dismissed Answer and Counterclaim filed September 11, 2009
Fifth Cause of Action	Unjust Enrichment or in the Alternative <i>Quantum Meruit</i>	All Defendants	All claims/action dismissed
Sixth Cause of Action	Foreclosure of Mechanic's Lien	All Defendants	All claims/action dismissed
Seventh Cause of Action	Claim of Priority	All Defendants	All claims/action dismissed
Eighth Cause of Action	Claim Against Bond	CAMCO Surety	All claims/action dismissed Answer and Counterclaim filed September 11, 2009
Ninth Cause of Action	Violation of NRS 624	APCO	All claims/action dismissed Answer filed September 11, 2009
Tenth Cause of Action	Violation of NRS 624	CAMCO	All claims/action dismissed

<u>Causes of Action</u>		<u>Party Name</u>	<u>Disposition</u>
			Answer and Counterclaim filed September 11, 2009
Eleventh Cause of Action	Declaratory Relief	All Defendants	All claims/action dismissed
COUNTERCLAIM OF CAMCO AGAINST ACCURACY GLASS & MIRROR			
First Cause of Action	Breach of Contract	Accuracy Glass	All claims/action dismissed Answer filed April 15, 2010
Second Cause of Action	Breach of Covenant and Good Faith and Fair Dealing	Accuracy Glass	All claims/action dismissed Answer filed April 15, 2010

**Complaint Re Foreclosure filed by
Accuracy Glass & Mirror Company**

Felix000067

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E. J. Davidson
CLERK OF THE COURT

12

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16 *Attorneys for Accuracy Glass & Mirror Company, Inc.*

DISTRICT COURT

CLARK COUNTY, NEVADA

11 **ACCURACY GLASS & MIRROR**

12 **COMPANY, INC., a Nevada corporation,**

13 **Plaintiff,**

14 **vs.**

15 **ASPHALT PRODUCTS CORP., a Nevada**

16 **corporation; APCO CONSTRUCTION, a**

17 **Nevada corporation; CAMCO PACIFIC**

18 **CONSTRUCTION COMPANY, INC., a**

19 **California corporation; GEMSTONE**

20 **DEVELOPMENT WEST, INC., Nevada**

21 **corporation; FIDELITY AND DEPOSIT**

22 **COMPANY OF MARYLAND; DOES I**

23 **through X; ROE CORPORATIONS I through**

24 **X; BOE BONDING COMPANIES I through X;**

25 **LOE LENDERS I through X, inclusive,**

26 **Defendants.**

CASE NO.: **A587168**

DEPT. NO.: **XX11**

COMPLAINT RE FORECLOSURE

EXEMPTION FROM ARBITRATION:

Title to Real Estate

22 **ACCURACY GLASS & MIRROR COMPANY, INC. ("Accuracy") by and through its**

23 **attorneys PEEL BRIMLEY LLP, as for its Complaint re Foreclosure ("Complaint") against the**

24 **above-named defendants complains, avers and alleges as follows:**

25 **///**

26 **///**

27 **///**

28 **///**

PEEL BRIMLEY LLP
3333 E. SERENE AVENUE, STE. 200
HENDERSON, NEVADA 89074
(702) 990-7272 • FAX (702) 990-7273

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CLERK OF THE COURT

Helix000068

PEEL BRIMLEY LLP
3333 E. SERENE AVENUE, STE. 200
HENDERSON, NEVADA 89074
(702) 990-7272 ♦ FAX (702) 990-7273

THE PARTIES

1
2 1. Accuracy is and was at all times relevant to this action a Nevada corporation duly
3 authorized, licensed and qualified to do business in Clark County, Nevada holding a Nevada State
4 Contractor's license, which license is in good standing.

5
6 2. Accuracy is informed and believes and therefore alleges that Defendant
7 GEMSTONE DEVELOPMENT WEST, INC., Nevada corporation ("Owner") is and was at all
8 times relevant to this action, the owner, reputed owner, or the person, individual and/or entity
9 who claims an ownership interest in that certain real property portions thereof located in Clark
10 County, Nevada and more particularly described as follows:

11 Manhattan West Condominiums (Project)
12 Spring Valley
13 County Assessor Description: See Attached Exhibit 1
14 SEC 32 TWP 21 RNG 60

15 and more particularly described as Clark County Assessor Parcel Numbers 163-32-112-001 thru
16 163-32-112-246, 163-32-101-020, 163-32-101-022 & 163-32-101-023 (formerly known as 163-
17 32-101-019) including all easements, rights-of-way, common areas and appurtenances thereto,
18 and surrounding space may be required for the convenient use and occupation thereof, upon
19 which Owners caused or allowed to be constructed certain improvements (the "Property").

20 3. The whole of the Property is reasonably necessary for the convenient use and
21 occupation of the improvements.

22 4. Accuracy is informed and believes and therefore alleges that Defendant
23 ASPHALT PRODUCTS CORP., a Nevada corporation ("Asphalt"), is and was at all times
24 relevant to this action doing business as a licensed contractor authorized to conduct business in
25 Clark County, Nevada.
26

27 5. Accuracy is informed and believes and therefore alleges that Defendant APCO
28 CONSTRUCTION, a Nevada corporation ("APCO"), is and was at all times relevant to this

1 action doing business as a licensed contractor authorized to conduct business in Clark County,
2 Nevada.

3 6. Accuracy is informed and believes and therefore alleges that Defendant CAMCO
4 PACIFIC CONSTRUCTION COMPANY, INC., a California corporation ("CPCC"), is and was
5 at all times relevant to this action doing business as a licensed contractor authorized to conduct
6 business in Clark County, Nevada.

7
8 7. Accuracy is informed and believes and therefore alleges that Defendant,
9 FIDELITY AND DEPOSIT COMPANY OF MARYLAND (hereinafter "CPCC Surety"), was
10 and is a bonding company licensed and qualified to do business as a surety in Nevada.

11 8. Accuracy does not know the true names of the individuals, corporations,
12 partnerships and entities sued and identified in fictitious names as DOES 1 through 10, ROE
13 CORPORATIONS 1 through 10, BOE BONDING COMPANIES 1 through 10 and LOE
14 LENDERS 1 through 10. Accuracy alleges that such Defendants claim an interest in or to the
15 Properties, and/or are responsible for damages suffered by Accuracy as more fully discussed
16 under the claims for relief set forth below. Accuracy will request leave of this Honorable Court to
17 amend this Complaint to show the true names and capacities of each such fictitious Defendant
18 when Accuracy discovers such information.
19
20

21 **FIRST CAUSE OF ACTION**
22 **(Breach of Contract against Asphalt and APCO)**

23 9. Accuracy repeats and realleges each and every allegation contained in the
24 preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as
25 follows:

26 10. On or about April 17, 2007 Accuracy entered into an Agreement with Asphalt and
27 APCO (the "APCO Agreement") to provide certain glass and glazing related work, materials and
28 equipment (the "Work") for the Property located in Clark County, Nevada.

1 11. Accuracy furnished the Work for the benefit of and at the specific instance and
2 request of Asphalt and APCO and/or Owner.

3 12. Pursuant to the Agreement, Accuracy was to be paid an amount in excess of Ten
4 Thousand Dollars (\$10,000.00) (hereinafter "Outstanding Balance") for the Work.
5

6 13. Accuracy furnished the Work and has otherwise performed its duties and
7 obligations as required by the Agreement.

8 14. Asphalt and APCO has breached the Agreement by, among other things:

9 a. Failing and/or refusing to pay the monies owed to Accuracy for the Work;

10 b. Failing to adjust the Agreement price to account for extra and/or changed
11 work, as well as suspensions and delays of Work caused or ordered by the Defendants and/or
12 their representatives;

13 c. Failing to promptly recognize and grant time extensions to reflect additional
14 time allowable under the Agreement and permit related adjustments in scheduled performance;

15 d. Failing and/or refusing to comply with the Agreement and Nevada law; and

16 e. Negligently or intentionally preventing, obstructing, hindering or interfering
17 with Accuracy's performance of the Work.
18

19 15. Accuracy is owed an amount in excess of Ten Thousand Dollars (\$10,000.00) for
20 the Work.
21

22 16. Accuracy has been required to engage the services of an attorney to collect the
23 Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's fees and
24 interest therefore.

25 ///

26 ///

27 ///

28

SECOND CAUSE OF ACTION
(Breach of Contract against CPCC)

17. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

18. On or about August 26, 2008, Accuracy entered into the Ratification and Amendment of Subcontract Agreement ("Ratification Agreement") with CPCC, who replaced Asphalt and APCO as the general contractor on the Project, to continue the Work for the Property.

19. Accuracy furnished the Work for the benefit of and at the specific instance and request of CPCC and/or Owner.

20. Pursuant to the Ratification Agreement, Accuracy was to be paid an amount in excess of Ten Thousand Dollars (\$10,000.00) (hereinafter "Outstanding Balance") for the Work.

21. Accuracy furnished the Work and has otherwise performed its duties and obligations as required by the Ratification Agreement.

22. CPCC has breached the Ratification Agreement by, among other things:

- a. Failing and/or refusing to pay the monies owed to Accuracy for the Work;
- b. Failing to adjust the Agreement price to account for extra and/or changed work, as well as suspensions and delays of Work caused or ordered by the Defendants and/or their representatives;
- c. Failing to promptly recognize and grant time extensions to reflect additional time allowable under the Ratification Agreement and permit related adjustments in scheduled performance;
- d. Failing and/or refusing to comply with the Ratification Agreement and Nevada law; and

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1 e. Negligently or intentionally preventing, obstructing, hindering or interfering
2 with Accuracy's performance of the Work.

3 23. Accuracy is owed an amount in excess of Ten Thousand Dollars (\$10,000.00) for
4 the Work.

5 24. Accuracy has been required to engage the services of an attorney to collect the
6 Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's fees and
7 interest therefore.
8

9 **THIRD CAUSE OF ACTION**
10 **(Breach of Implied Covenant of Good Faith & Fair Dealing**
11 **Against Asphalt, APCO & CPCC)**

12 25. Accuracy repeats and realleges each and every allegation contained in the
13 preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as
14 follows:

15 26. There is a covenant of good faith and fair dealing implied in every agreement,
16 including the APCO Agreement and the Ratification Agreement.

17 27. Asphalt and APCO breached its duty to act in good faith by performing the APCO
18 Agreement in a manner that was unfaithful to the purpose of the APCO Agreement, thereby
19 denying Accuracy's justified expectations.
20

21 28. CPCC breached its duty to act in good faith by performing the Ratification
22 Agreement in a manner that was unfaithful to the purpose of the Ratification Agreement, thereby
23 denying Accuracy's justified expectations.

24 29. Due to the actions of Asphalt, APCO and CPCC, Accuracy suffered damages in an
25 amount to be determined at trial for which Accuracy is entitled to judgment plus interest.

26 ///

27 ///

30. Accuracy has been required to engage the services of an attorney to collect the Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's fees and interest therefore.

31. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

33. As to Asphalt, APCO and CPCC, this cause of action is being pled in the alternative.

35. The Defendants knew or should have known that Accuracy expected to be paid for the Work.

37. To date, the Defendants have failed, neglected, and/or refused to pay the Outstanding Balance.

39. Accuracy has been required to engage the services of an attorney to collect the Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's fees and interest therefore.

///

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FIFTH CAUSE OF ACTION
(Foreclosure of Mechanic's Lien)

40. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

41. The provision of the Work was at the special instance and request of the Defendants for the Property.

42. As provided at NRS 108.245 and common law, the Defendants had knowledge of Accuracy's delivery of the Work to the Property or Accuracy provided a Notice of Right to Lien.

43. Accuracy demanded payment of an amount in excess of Ten Thousand and no/100 Dollars (\$10,000.00), which amount remains past due and owing.

44. On or about December 5, 2008, Accuracy timely recorded a Notice of Lien in Book 20081205 of the Official Records of Clark County, Nevada, as Instrument No. 0001947 (the "Original Lien").

45. On or about February 2, 2009, Accuracy timely recorded an Amended Notice of Lien in Book 20090202 of the Official Records of Clark County, Nevada, as Instrument No. 0000834 (the "Amended Lien").

46. The Original Lien and Amended Lien are hereinafter referred to as the "Liens".

47. The Liens were in writing and were recorded against the Property for the outstanding balance due to Accuracy in the amount of One Million Nine Hundred Fifty-Six Thousand Nine Hundred Two and 53/100 Dollars (\$1,956,902.53).

48. The Liens were served upon the Owner and/or its authorized agents, as required by law.

49. Accuracy is entitled to an award of reasonable attorney's fees, costs and interest on the Outstanding Balance, as provided in Chapter 108 of the Nevada Revised Statutes.

SIXTH CAUSE OF ACTION
(Claim of Priority)

50. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

51. Accuracy is informed and believes and therefore alleges that construction on the Property commenced before the recording of Defendant LOE LENDERS' Deed(s) of Trust and/or other interest(s) in the Property.

52. Accuracy's claim against the Property is superior to the claim(s) of LOE LENDERS and/or any other Defendant.

53. Accuracy has been required to engage the services of an attorney to collect the Outstanding Balance due and owing for the Work, and Accuracy is entitled to recover its reasonable costs, attorney's fees and interest therefore.

SEVENTH CAUSE OF ACTION
(Claim Against Bond – CPCC Surety)

54. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

55. Prior to the events giving rise to this Complaint, the CPCC Surety issued License Bond No. 8739721 (hereinafter the "Bond") in the sum of Fifty Thousand Dollars (\$50,000.00).

56. CPCC is named as principal and CPCC Surety is named as surety on the Bond.

57. The Bond was provided pursuant to the requirements of NRS 624.270, which Bond was in force during all times relevant to this action.

58. Accuracy furnished the Work as stated herein and has not been paid for the same. Accuracy therefore claims payment on said Bond.

1 59. The CPCC Surety is obligated to pay Accuracy the sums due.

60. Demand for the payment of the sums due to Accuracy has been made, but CPCC and the CPCC Surety have failed, neglected and refused to pay the same to Accuracy.

61. CPCC and the CPCC Surety owe Accuracy the penal sum of the Bond.

6 62. Accuracy was required to engage the services of an attorney to collect the
7 Outstanding Balance due and owing to Accuracy and Accuracy is entitled to recover its
8 reasonable attorney's fees and costs therefore.

EIGHTH CAUSE OF ACTION
(Violation of NRS 624)

63. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Complaint, incorporates them by reference, and further alleges as follows:

14 64. NRS 624.606 to 624.630, et. seq. (the "Statute") requires contractors (such as
15 Asphalt and APCO and/or CPCC), to, among other things, timely pay their subcontractors (such
16 as Accuracy), as provided in the in the Statute.

65. In violation of the Statute, Asphalt and APCO and/or CPCC have failed and/or refused to timely pay Accuracy monies due and owing.

66. Asphalt's and APCO's and/or CPCC's violation of the Statute constitutes negligence per se.

67. By reason of the foregoing, Accuracy is entitled to a judgment against Asphalt and APCO and/or CPCC in the amount of the Outstanding Balance

68. Accuracy has been required to engage the services of an attorney to collect the Outstanding Balance and Accuracy is entitled to recover its reasonable costs, attorney's fees and interests therefore.

28 **WHEREFORE**, Accuracy prays that this Honorable Court:

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1 1. Enters judgment against the Defendants, and each of them, jointly and severally, in
2 the Outstanding Balance amount;

3 2. Enters a judgment against Defendants, and each of them, jointly and severally, for
4 Accuracy's reasonable costs and attorney's fees incurred in the collection of the Outstanding
5 Balance, as well as an award of interest thereon;

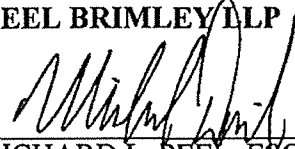
6 3. Enter a judgment declaring that Accuracy has valid and enforceable mechanic's
7 liens against the Property, with priority over all Defendants, in an amount of the Outstanding
8 Balance;

9 4. Adjudge a lien upon the Property for the Outstanding Balance, plus reasonable
10 attorneys fees, costs and interest thereon, and that this Honorable Court enter an Order that the
11 Property, and improvements, such as may be necessary, be sold pursuant to the laws of the State
12 of Nevada, and that the proceeds of said sale be applied to the payment of sums due Accuracy
13 herein; and
14

15 5. For such other and further relief as this Honorable Court deems just and proper in
16 the premises.
17

18 Dated this 7 day of April 2009.

19 PEEL BRIMLEY LLP

20 
21 RICHARD L. PEEL, ESQ.

22 Nevada Bar No. 4359

23 MICHAEL J. DAVIDSON, ESQ.

24 Nevada Bar No. 10332

25 DALLIN T. WAYMENT, ESQ.

26 Nevada Bar No. 10270

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Attorneys for Accuracy Glass & Mirror
Company, Inc.

EXHIBIT 1
Manhattan West
Spring Valley

County Assessor Parcel Nos.: 163-32-112-001 thru 163-32-112-246,
163-32-101-020, 163-32-101-022 & 163-32-101-023
(formerly known as 163-32-101-019)

Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-001 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 101 Block 2 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-002 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 102 Block 2 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-003 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 201 Block 2 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-004 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 301 Block 2 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-005 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 401 Block 2 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-006 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 101 Block 3 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-007 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 102 Block 3 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-008 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 201 Block 3 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

*Lien Claimant has provided the best estimate of the amount owed to Lien Claimant with respect to materials or equipment furnished by Lien Claimant for the improvement of the property. Lien Claimant reserves the right to amend or modify the amount owed at Lien Claimant's discretion.

Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-009 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 301 Block 3 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-010 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 401 Block 3 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-011 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 101 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-012 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 102 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-013 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 103 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-014 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 201 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-015 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 202 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-016 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 203 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-017 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 204 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-018 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 205 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-019 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 206 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-020 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 207 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-021 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 208 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-022 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 209 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-023 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 210 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-024 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 301 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-025 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 302 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-026 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 303 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-027 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 304 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-028 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 305 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-029 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 306 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-030 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 307 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-031 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 308 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-032 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 309 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-033 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 310 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-034 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 401 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-035 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 402 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-036 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 403 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-037 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 404 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-038 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 405 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-039 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 406 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-040 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 407 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-041 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 408 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-042 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 409 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-043 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 410 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-044 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 501 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-045 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 502 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-046 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 503 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-047 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 504 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-048 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 505 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

*Lien Claimant has provided the best estimate of the amount owed to Lien Claimant with respect to materials or equipment furnished by Lien Claimant for the improvement of the property. Lien Claimant reserves the right to amend or modify the amount owed at Lien Claimant's discretion.

Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-049 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 506 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-050 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 507 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-051 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 508 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-052 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 509 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-053 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 510 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-054 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 601 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-055 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 602 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-056 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 604 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-057 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 604 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-058 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 605 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

*Lien Claimant has provided the best estimate of the amount owed to Lien Claimant with respect to materials or equipment furnished by Lien Claimant for the improvement of the property. Lien Claimant reserves the right to amend or modify the amount owed at Lien Claimant's discretion.

Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-059 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 606 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-060 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 607 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-061 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 608 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-062 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 609 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-063 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 610 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-064 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 701 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-065 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 702 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-066 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 703 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-067 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 704 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-068 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 705 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-069 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 706 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-070 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 707 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-071 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 708 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-072 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 709 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-073 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 710 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-074 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 801 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-075 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 802 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-076 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 803 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-077 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 804 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-078 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 805 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-079 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 806 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-080 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 807 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-081 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 808 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-082 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 809 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-083 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 810 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-084 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 902 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-085 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 903 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-086 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 904 Block 7 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-087 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 101 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-088 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 12 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-089 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 103 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-090 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 104 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-091 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 105 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-092 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 106 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-093 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 107 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-094 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 108 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-095 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 109 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-096 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 110 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-097 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 111 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-098 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 112Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-099 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 113 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-100 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 114 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-101 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 115 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-102 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 116 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-103 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 117 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-104 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 118 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-105 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 119 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-106 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 120 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-107 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 201 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-108 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 202 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-109 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 203 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-110 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 204 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-111 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 205 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-112 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 206 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-113 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 207 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-114 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 208 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-115 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 209 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-116 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 210 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-117 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 211 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-118 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 212 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-119 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 213 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-120 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 214 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-121 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 215 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-122 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 216 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-123 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 217 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-124 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 218 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-125 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 219 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-126 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 220 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-127 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 301 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-128 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 302 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-129 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 303 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-130 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 304 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-131 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 305 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-132 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 306 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-133 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 307 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-134 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 308 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-135 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 309 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-136 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 310 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-137 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 311 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-138 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 312 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-139 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 313 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-140 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 314 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-141 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 315 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-142 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 316 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-143 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 317 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-144 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 318 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-145 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 319 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-146 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 320 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-147 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 401 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-148 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 402 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-149 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 403 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-150 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 404 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-151 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 405 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-152 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 406 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-153 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 407 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-154 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 408 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-155 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 409 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-156 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 410 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-157 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 411 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-158 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 412 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-159 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 413 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-160 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 414 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-161 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 415 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-162 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 416 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-163 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 417 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-164 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 418 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-165 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 419 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-166 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 420 Block 8 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-167 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 101 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-168 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 102 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-169 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 103 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-170 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 104 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-171 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 105 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-172 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 106 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-173 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 107 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-174 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 108 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-175 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 109 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-176 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 110 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-177 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 111 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-178 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 112 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-179 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 113 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-180 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 114 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-181 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 115 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-182 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 116 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-183 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 117 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-184 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 118 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-185 Spring Valley	Manhattan West-Phase 1 Plat Book 41 Page 28 Unit 119 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-186 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 120 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-187 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 201 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-188 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 202 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

*Lien Claimant has provided the best estimate of the amount owed to Lien Claimant with respect to materials or equipment furnished by Lien Claimant for the improvement of the property. Lien Claimant reserves the right to amend or modify the amount owed at Lien Claimant's discretion.

Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-189 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 203 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-190 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 204 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-191 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 205 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-192 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 206 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-193 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 207 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-194 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 208 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-195 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 209 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-196 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 210 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-197 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 211 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-198 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 212 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-199 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 213 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-200 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 214 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-201 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 215 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-202 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 216 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-203 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 217 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-204 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 218 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-205 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 219 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-206 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 220 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-207 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 301 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-208 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 302 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-209 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 303 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-210 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 304 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-211 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 305 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-212 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 306 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-213 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 307 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-214 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 308 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-215 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 309 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-216 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 310 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-217 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 311 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-218 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 312 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-219 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 313 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-220 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 314 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-221 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 315 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-222 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 316 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-223 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 317 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-224 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 318 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-225 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 319 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-226 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 320 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-227 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 401 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-228 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 402 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-229 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 403 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-230 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 404 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-231 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 405 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-232 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 406 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-233 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 407 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-234 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 408 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-235 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 409 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-236 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 410 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-237 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 411 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-238 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 412 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

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Parcel Number/ Location Address/ Township	Property Description	Owner Name & Address
163-32-112-239 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 413 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-240 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 414 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-241 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 415 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-242 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 416 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-243 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 417 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-244 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 418 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-245 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 419 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-112-246 Spring Valley	Manhattan West-Phase 1 Plat Book 141 Page 28 Unit 420 Block 9 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-101-020 Spring Valley	PT NE4 NW4 SEC 32 21 60 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-101-022 Spring Valley	PT NE4 NW4 SEC 32 21 60 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238
163-32-101-023 Spring Valley	PT NE4 NW4 SEC 32 21 60 SEC 32 TWP 21 RNG 60	Gemstone Development West Inc 9121 W Russell Rd #117 Las Vegas, NV 89148-1238

*Lien Claimant has provided the best estimate of the amount owed to Lien Claimant with respect to materials or equipment furnished by Lien Claimant for the improvement of the property. Lien Claimant reserves the right to amend or modify the amount owed at Lien Claimant's discretion.

Edmund H. Hines
CLERK OF THE COURT

1 **ACOM**
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16 *Attorneys for Accuracy Glass & Mirror Company, Inc.*

DISTRICT COURT
CLARK COUNTY, NEVADA

11 **ACCURACY GLASS & MIRROR**
12 **COMPANY, INC.,** a Nevada corporation,

13 Plaintiff,

14 vs.

15 **APCO CONSTRUCTION**, a Nevada
16 corporation; **CAMCO PACIFIC**
17 **CONSTRUCTION COMPANY, INC.,** a
18 California corporation; **GEMSTONE**
19 **DEVELOPMENT WEST, INC.,** Nevada
20 corporation; **FIDELITY AND DEPOSIT**
21 **COMPANY OF MARYLAND; SCOTT**
22 **FINANCIAL CORPORATION,** a North Dakota
23 corporation; **DOES I through X; ROE**
24 **CORPORATIONS I through X; BOE**
25 **BONDING COMPANIES I through X; LOE**
26 **LENDERS I through X, inclusive,**

27 Defendants.

LEAD CASE NO.: A571228
DEPT. NO.: XIII

Consolidated with:

A571792
A574391
A577623
A583289
A584730
A587168

09A587168
203943



**FIRST AMENDED COMPLAINT RE
FORECLOSURE**

EXEMPTION FROM ARBITRATION:
Title to Real Estate

22 **ACCURACY GLASS & MIRROR COMPANY, INC.** ("Accuracy") by and through its
23 attorneys **PEEL BRIMLEY LLP**, as for its First Amended Complaint re Foreclosure ("Amended
24 Complaint") against the above-named defendants complains, avers and alleges as follows:

25 ///

26 ///

27 ///

28 ///

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THE PARTIES

1. Accuracy is and was at all times relevant to this action a Nevada corporation duly authorized, licensed and qualified to do business in Clark County, Nevada holding a Nevada State Contractor's license, which license is in good standing.

2. Accuracy is informed and believes and therefore alleges that Defendant GEMSTONE DEVELOPMENT WEST, INC., Nevada corporation ("Owner") is and was at all times relevant to this action, the owner, reputed owner, or the person, individual and/or entity who claims an ownership interest in that certain real property portions thereof located in Clark County, Nevada and more particularly described as follows:

Manhattan West Condominiums (Project)
Spring Valley
County Assessor Description: PT NE4 NW4 SEC 32 21 60 &
PT N2 NW4 SEC 32 21 60
SEC 32 TWP 21 RNG 60

and more particularly described as Clark County Assessor Parcel Numbers 163-32-101-020 and 163-32-101-022 through 163-32-101-024 (formerly known as 163-32-101-019 and 163-32-112-001 thru 163-32-112-246) including all easements, rights-of-way, common areas and appurtenances thereto, and surrounding space may be required for the convenient use and occupation thereof, upon which Owners caused or allowed to be constructed certain improvements (the "Property").

3. The whole of the Property is reasonably necessary for the convenient use and occupation of the improvements.

4. Accuracy is informed and believes and therefore alleges that Defendant APCO CONSTRUCTION, a Nevada corporation ("APCO"), is and was at all times relevant to this action doing business as a licensed contractor authorized to conduct business in Clark County, Nevada. APCO may also be known as Asphalt Products Company.

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1 5. Accuracy is informed and believes and therefore alleges that Defendant CAMCO
2 PACIFIC CONSTRUCTION COMPANY, INC., a California corporation ("CAMCO"), is and
3 was at all times relevant to this action doing business as a licensed contractor authorized to
4 conduct business in Clark County, Nevada.

5
6 6. Accuracy is informed and believes and therefore alleges that Defendant,
7 FIDELITY AND DEPOSIT COMPANY OF MARYLAND (hereinafter "CAMCO Surety"), was
8 and is a bonding company licensed and qualified to do business as a surety in Nevada.

9 7. Accuracy is informed and believes and therefore alleges that Defendant Scott
10 Financial Corporation ("SFC") is a North Dakota corporation with its principle place of business
11 in Bismark, North Dakota. SFC is engaged in the business of underwriting and originating loans,
12 selling participation in those loans, and servicing the loans. SFC has recorded deeds of trust
13 securing loans given to the Owner for, inter alia, development of the Property.

14
15 8. Accuracy does not know the true names of the individuals, corporations,
16 partnerships and entities sued and identified in fictitious names as DOES I through X, ROE
17 CORPORATIONS I through X, BOE BONDING COMPANIES I through X and LOE
18 LENDERS I through X. Accuracy alleges that such Defendants claim an interest in or to the
19 Properties, and/or are responsible for damages suffered by Accuracy as more fully discussed
20 under the claims for relief set forth below. Accuracy will request leave of this Honorable Court to
21 amend this Amended Complaint to show the true names and capacities of each such fictitious
22 Defendant when Accuracy discovers such information.

23
24 **FIRST CAUSE OF ACTION**
25 **(Breach of Contract against APCO)**

26 9. Accuracy repeats and realleges each and every allegation contained in the
27 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
28 alleges as follows:

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- Accuracy Glass & Mirror\008 - APCO
Construction [Manhattan]

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1 10. On or about April 17, 2007 Accuracy entered into an Agreement with APCO to
2 provide certain glass and glazing related work, materials, and equipment (the "APCO Work") for
3 the Property located in Clark County, Nevada.

4 11. Accuracy furnished the APCO Work for the benefit of and at the specific instance
5 and request of APCO and/or the Owner.

6 12. Pursuant to the APCO Agreement, Accuracy was to be paid an amount in excess
7 of Ten Thousand Dollars (\$10,000.00) (hereinafter "APCO Outstanding Balance") for the APCO
8 Work.
9

10 13. Accuracy furnished the APCO Work and has otherwise performed its duties and
11 obligations as required by the APCO Agreement.

12 14. APCO breached the APCO Agreement by, among other things:

13 a. Failing and/or refusing to pay the monies owed to Accuracy for the APCO
14 Work;
15

16 b. Failing to adjust the APCO Agreement price to account for extra and/or
17 changed work, as well as suspensions and delays of the APCO Work caused or ordered by the
18 Defendants and/or their representatives;

19 c. Failing to promptly recognize and grant time extensions to reflect additional
20 time allowable under the APCO Agreement and permit related adjustments in scheduled
21 performance;
22

23 d. Failing and/or refusing to comply with the APCO Agreement and Nevada law;
24 and

25 e. Negligently or intentionally preventing, obstructing, hindering or interfering
26 with Accuracy's performance of the APCO Work.
27
28

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15. Accuracy is owed an amount in excess of Ten Thousand Dollars (\$10,000.00) for the APCO Work.

16. Accuracy has been required to engage the services of an attorney to collect the APCO Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's fees and interest therefore.

SECOND CAUSE OF ACTION
(Breach of Contract against CAMCO)

17. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Amended Complaint, incorporates them by reference, and further alleges as follows:

18. On or about August 26, 2008, Accuracy entered into a Ratification and Amendment of Subcontract Agreement with CAMCO ("CAMCO Agreement") who replaced APCO as the general contractor on the Project, to continue and complete the provision of work, materials, and equipment for the Property ("CAMCO Work").

19. Accuracy furnished the CAMCO Work for the benefit of and at the specific instance and request of CAMCO and/or the Owner.

20. Pursuant to the CAMCO Agreement, Accuracy was to be paid an amount in excess of Ten Thousand Dollars (\$10,000.00) (hereinafter "CAMCO Outstanding Balance") for the CAMCO Work.

21. Accuracy furnished the CAMCO Work and has otherwise performed its duties and obligations as required by the CAMCO Agreement.

22. CAMCO has breached the CAMCO Agreement by, among other things:

a. Failing and/or refusing to pay the monies owed to Accuracy for the CAMCO Work;

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1 b. Failing to adjust the CAMCO Agreement price to account for extra and/or
2 changed work, as well as suspensions and delays of CAMCO Work caused or ordered by the
3 Defendants and/or their representatives;

4 c. Failing to promptly recognize and grant time extensions to reflect additional
5 time allowable under the CAMCO Agreement and permit related adjustments in scheduled
6 performance;

7 d. Failing and/or refusing to comply with the CAMCO Agreement and Nevada
8 law; and

9 e. Negligently or intentionally preventing, obstructing, hindering or interfering
10 with Accuracy's performance of the CAMCO Work.

11 23. Accuracy is owed an amount in excess of Ten Thousand Dollars (\$10,000.00) for
12 the CAMCO Work.

13 24. Accuracy has been required to engage the services of an attorney to collect the
14 CAMCO Outstanding Balance, and Accuracy is entitled to recover its reasonable costs, attorney's
15 fees and interest therefore.

16 **THIRD CAUSE OF ACTION**

17 **(Breach of Implied Covenant of Good Faith & Fair Dealing Against APCO)**

18 25. Accuracy repeats and realleges each and every allegation contained in the
19 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
20 alleges as follows:

21 26. There is a covenant of good faith and fair dealing implied in every agreement,
22 including the APCO Agreement.

23 27. APCO breached its duty to act in good faith by performing the APCO Agreement
24 in a manner that was unfaithful to the purpose of the APCO Agreement, thereby denying
25 Accuracy's justified expectations.

26 H:\PB&S\CLIENT FILES\0001 - 0999 (A - C)\0039
27 - Accuracy Glass & Mirror\008 - APCO
28 Construction [Manhattan]

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1 28. Due to the actions of APCO, Accuracy suffered damages in an amount to be
2 determined at trial for which Accuracy is entitled to judgment plus interest.

3 29. Accuracy has been required to engage the services of an attorney to collect the
4 APCO Outstanding Balance and Accuracy is entitled to recover its reasonable costs, attorney's
5 fees and interest therefore.
6

7 **FOURTH CAUSE OF ACTION**

8 **(Breach of Implied Covenant of Good Faith & Fair Dealing Against CAMCO)**

9 30. Accuracy repeats and realleges each and every allegation contained in the
10 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
11 alleges as follows:

12 31. There is a covenant of good faith and fair dealing implied in every agreement,
13 including the CAMCO Agreement.

14 32. CAMCO breached its duty to act in good faith by performing the CAMCO
15 Agreement in a manner that was unfaithful to the purpose of the CAMCO Agreement, thereby
16 denying Accuracy's justified expectations.
17

18 33. Due to the actions of CAMCO, Accuracy suffered damages in an amount to be
19 determined at trial for which Accuracy is entitled to judgment plus interest.

20 34. Accuracy has been required to engage the services of an attorney to collect the
21 CAMCO Outstanding Balance and Accuracy is entitled to recover its reasonable costs, attorney's
22 fees and interest therefore.
23

24 **FIFTH CAUSE OF ACTION**

25 **(Unjust Enrichment or in the Alternative Quantum Meruit – Against All Defendants)**

26 35. Accuracy repeats and realleges each and every allegation contained in the
27 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
28 alleges as follows:

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1 36. Accuracy furnished the APCO Work and the CAMCO Work for the benefit of and
2 at the specific instance and request of the Defendants.

3 37. As to APCO and CAMCO this cause of action is being pled in the alternative.

4 38. The Defendants accepted, used, and enjoyed the benefit of the APCO Work and
5 CAMCO Work.

6 39. The Defendants knew or should have known that Accuracy expected to be paid for
7 the APCO Work and the CAMCO Work.

8 40. Accuracy has demanded payment of the APCO Outstanding Balance and the
9 CAMCO Outstanding Balance.

10 41. To date, the Defendants have failed, neglected, and/or refused to pay the APCO
11 Outstanding Balance or the CAMCO Outstanding Balance.

12 42. The Defendants have been unjustly enriched, to the detriment of Accuracy.

13 43. Accuracy has been required to engage the services of an attorney to collect the
14 APCO Outstanding Balance and the CAMCO Outstanding Balance and Accuracy is entitled to
15 recover its reasonable costs, attorney's fees and interest therefore.

16 **SIXTH CAUSE OF ACTION**
17 **(Foreclosure of Mechanic's Lien)**

18 44. Accuracy repeats and realleges each and every allegation contained in the
19 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
20 alleges as follows:

21 45. The provision of the APCO Work and CAMCO Work was at the special instance
22 and request of the Defendants for the Property.

23 46. As provided at NRS 108.245 and common law, the Defendants had knowledge of
24 Accuracy's delivery of the APCO Work and CAMCO Work to the Property or Accuracy
25 provided a Notice of Right to Lien.

26 HAPB&S\CLIENT FILES\0001 - 0999 (A - C)\0039
27 - Accuracy Glass & Mirror\008 - APCO
28 Construction [Manhattan]

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1 47. Accuracy demanded payment of the APCO Outstanding Balance and CAMCO
2 Outstanding Balance.

3 48. On or about December 5, 2008, Accuracy timely recorded a Notice of Lien in
4 Book 20081205 of the Official Records of Clark County, Nevada, as Instrument No. 0001947
5 (the "Original Lien").
6

7 49. On or about February 2, 2009, Accuracy timely recorded an Amended Notice of
8 Lien in Book 20090202 of the Official Records of Clark County, Nevada, as Instrument No.
9 0000834 (the "Amended Lien").

10 50. The Original Lien and Amended Lien are hereinafter referred to as the "Liens".

11 51. The Liens were in writing and were recorded against the Property for the
12 outstanding balance due to Accuracy in the amount of One Million Nine Hundred Fifty-Six
13 Thousand Nine Hundred Two and 53/100 Dollars (\$1,956,902.53).
14

15 52. The Liens were served upon the Owner and/or its authorized agents, as required by
16 law.

17 53. Accuracy is entitled to an award of reasonable attorney's fees, costs and interest on
18 the APCO Outstanding Balance and CAMCO Outstanding Balance, as provided in Chapter 108
19 of the Nevada Revised Statutes.
20

21 **SEVENTH CAUSE OF ACTION**
22 **(Claim of Priority)**

23 54. Accuracy repeats and realleges each and every allegation contained in the
24 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
25 alleges as follows:

26 55. Accuracy is informed and believes and therefore alleges that construction on the
27 Property commenced before the recording of any deed(s) of trust and/or other interest(s) in the
28 Property, including the deeds of trust recorded by SFC.

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1 56. Accuracy is informed and believes and therefore alleges that even if a deed(s) of
2 trust and/or other interest(s) in the Property were recorded before construction on the Property
3 commenced, those deed(s) of trust, including SFC's, were thereafter expressly subordinated to
4 Accuracy's statutory mechanics' lien thereby elevating Accuracy's statutory mechanics' lien to a
5 position superior to those deed(s) of trust and/or other interests(s) in the Property.
6

7 57. Accuracy's claim against the Property is superior to the claim(s) of SFC, any other
8 defendant, and/or any Loe Lender.

9 58. Accuracy has been required to engage the services of an attorney to collect the
10 APCO Outstanding Balance due and owing for the APCO Work and to collect the CAMCO
11 Outstanding Balance due and owing for the CAMCO Work and Accuracy is entitled to recover its
12 reasonable costs, attorney's fees and interest therefore.
13

14 **EIGHTH CAUSE OF ACTION**
15 **(Claim Against Bond – CAMCO Surety)**

16 59. Accuracy repeats and realleges each and every allegation contained in the
17 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
18 alleges as follows:

19 60. Prior to the events giving rise to this Amended Complaint, the CAMCO Surety
20 issued License Bond No. 8739721 (hereinafter the "Bond") in the sum of Fifty Thousand Dollars
21 (\$50,000.00).

22 61. CAMCO is named as principal and CAMCO Surety is named as surety on the
23 Bond.

24 62. The Bond was provided pursuant to the requirements of NRS 624.270, which
25 Bond was in force during all times relevant to this action.
26

27 63. Accuracy furnished the CAMCO Work as stated herein and has not been paid for
28 the same. Accuracy therefore claims payment on said Bond.

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1 64. The CAMCO Surety is obligated to pay Accuracy the sums due.

2 65. Demand for the payment of the sums due to Accuracy has been made, but
3 CAMCO and the CAMCO Surety have failed, neglected and refused to pay the same to
4 Accuracy.

5 66. CAMCO and the CAMCO Surety owe Accuracy the penal sum of the Bond.

6 67. Accuracy was required to engage the services of an attorney to collect the
7 CAMCO Outstanding Balance due and owing to Accuracy and Accuracy is entitled to recover its
8 reasonable attorney's fees and costs therefore.
9

10 **NINTH CAUSE OF ACTION**
11 **(Violation of NRS 624 - APCO)**

12 68. Accuracy repeats and realleges each and every allegation contained in the
13 preceding paragraphs of this Amended Complaint, incorporates them by reference, and further
14 alleges as follows:

15 69. NRS 624.606 to 624.630, et. seq. (the "Statute") requires contractors such as
16 APCO to, among other things, timely pay their subcontractors (such as Accuracy), as provided in
17 the in the Statute.
18

19 70. In violation of the Statute, APCO failed and/or refused to timely pay Accuracy
20 monies due and owing.

21 71. APCO's violation of the Statute constitutes negligence per se.

22 72. By reason of the foregoing, Accuracy is entitled to a judgment against APCO in
23 the amount of the APCO Outstanding Balance
24

25 73. Accuracy has been required to engage the services of an attorney to collect the
26 APCO Outstanding Balance and Accuracy is entitled to recover its reasonable costs, attorney's
27 fees and interests therefore.
28

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TENTH CAUSE OF ACTION
(Violation of NRS 624 - CAMCO)

74. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Amended Complaint, incorporates them by reference, and further alleges as follows:

75. NRS 624.606 to 624.630, et. seq. (the "Statute") requires contractors such as CAMCO to, among other things, timely pay their subcontractors (such as Accuracy), as provided in the in the Statute.

76. In violation of the Statute, CAMCO failed and/or refused to timely pay Accuracy monies due and owing.

77. CAMCO's violation of the Statute constitutes negligence per se.

78. By reason of the foregoing, Accuracy is entitled to a judgment against CAMCO in the amount of the CAMCO Outstanding Balance

79. Accuracy has been required to engage the services of an attorney to collect the CAMCO Outstanding Balance and Accuracy is entitled to recover its reasonable costs, attorney's fees and interests therefore.

ELEVENTH CAUSE OF ACTION
(Declaratory Judgment)

80. Accuracy repeats and realleges each and every allegation contained in the preceding paragraphs of this Amended Complaint, incorporates them by reference, and further alleges as follows:

81. Upon information and belief, Owner is the Trustor and SFC is the beneficiary under the following deeds of trust covering the real property at issue:

- a. Senior Deed of Trust dated June 26, 2006, and recorded July 5, 2006, at Book 20060705, Instrument No. 0004264;

1 b. Junior Deed of Trust dated June 26, 2006, and recorded July 5, 2006, at Book
2 20060705, Instrument No. 0004265;

3 c. Third Deed of Trust dated June 26, 2006, and recorded July 5, 2006, at Book
4 20060705, Instrument No. 0004266; and,

5 d. Senior Debt Deed of Trust dated and recorded February 7, 2008, at Book
6 20080207, Instrument No. 01482.

7 82. On February 7, 2008, SFC executed a Mezzanine Deeds of Trust Subordination
8 Agreement that expressly subordinated the Senior, Junior, and Third Deeds of Trust to the Senior
9 Debt Deed of Trust "in all respects", "for all purposes", and, " regardless of any priority
10 otherwise available to SFC by law or agreement".

11 83. The Mezzanine Deeds of Trust Subordination Agreement contains a provision that
12 it shall not be construed as affecting the priority of any other lien or encumbrances in favor of
13 SFC. Thus, no presumptions or determinations are to be made in SFC's favor concerning the
14 priority of competing liens or encumbrances on the property, such as Accuracy's mechanics' lien.

15 84. Pursuant to the a Mezzanine Deeds of Trust Subordination Agreement, SFC was to
16 cause the Senior, Junior, and Third Deeds of Trust to contain specific statements thereon that they
17 were expressly subordinated to the Senior Debt Deed of Trust and SFC was to mark its books
18 conspicuously to evidence the subordination of the Senior, Junior, and Third Deeds of Trust to the
19 Senior Debt Deed of Trust.
20

21 85. Accuracy is informed and believes and therefore alleges that construction on the
22 Property commenced at least before the recording of the Senior Debt Deed of Trust and that by
23 law, all mechanics' liens, including Accuracy's, enjoy a position of priority over the Senior Debt
24 Deed of Trust.
25

26 86. Because the Mezzanine Deeds of Trust Subordination Agreement renders the
27 Senior, Junior, and Third Deeds of Trust expressly subordinate to the Senior Debt Deed of Trust,
28

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1 it also renders, as a matter of law, the Senior, Junior, and Third Deeds of Trust expressly
2 subordinate to all mechanics' liens, including Accuracy's.

3 87. A dispute has arisen, and an actual controversy now exists over the priority issue
4 of Accuracy's mechanics' lien over other encumbrances on the property.

5 88. Accuracy is entitled to a court order declaring that its mechanics' lien has a
6 superior lien position on the Property over any other lien or encumbrance created by or for the
7 benefit of SFC or any other entity.

8
9 **WHEREFORE**, Accuracy prays that this Honorable Court:

10 1. Enters judgment against the Defendants, and each of them, jointly and severally, in
11 the APCO Outstanding Balance and CAMCO Outstanding Balance amounts;

12 2. Enters a judgment against Defendants, and each of them, jointly and severally, for
13 Accuracy's reasonable costs and attorney's fees incurred in the collection of the APCO
14 Outstanding Balance and the CAMCO Outstanding Balance, as well as an award of interest
15 thereon;

16 3. Enter a judgment declaring that Accuracy has valid and enforceable mechanic's
17 liens against the Property, with priority over all Defendants, in an amount of the APCO
18 Outstanding Balance and CAMCO Outstanding Balance;

19 4. Adjudge a lien upon the Property for the APCO Outstanding Balance and
20 CAMCO Outstanding Balance, plus reasonable attorneys fees, costs and interest thereon, and that
21 this Honorable Court enter an Order that the Property, and improvements, such as may be
22 necessary, be sold pursuant to the laws of the State of Nevada, and that the proceeds of said sale
23 be applied to the payment of sums due Accuracy herein;

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1 5. Enter a judgment declaring that Accuracy's mechanics' lien enjoys a position of
2 priority superior to any lien or encumbrance created by or for the benefit of SFC or any other
3 entity; and,

4 6. For such other and further relief as this Honorable Court deems just and proper in
5 the premises.
6

7 Dated this 23 day of June 2009.

PEEL BRIMLEY LLP


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**APCO's Answer to Accuracy's First
Amended Complaint Re Foreclosure**

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CLERK OF THE COURT

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10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 APCO CONSTRUCTION, a Nevada
13 corporation,

14 Plaintiff,

15 vs.

16 GEMSTONE DEVELOPMENT WEST, INC.,
17 a Nevada corporation; NEVADA
18 CONSTRUCTION SERVICES, a Nevada
19 corporation; SCOTT FINANCIAL
20 CORPORATION, a North Dakota
21 corporation; COMMONWEALTH LAND
22 TITLE INSURANCE COMPANY; FIRST
23 AMERICAN TITLE INSURANCE
24 COMPANY; and DOES I through X,

22 Defendants.

23 **ACCURACY GLASS & MIRROR**
24 **COMPANY, INC., a Nevada corporation,**

25 Plaintiff,

26 vs.
27

28 APCO CONSTRUCTION, a Nevada

CASE NO.: 08-A-571228
DEPT. NO.: XIII

Consolidated with: A574391, A574792,
A577623, A583289, A584730, A587168,
A580889 and A589195

**APCO CONSTRUCTION'S ANSWER TO
ACCURACY GLASS & MIRROR
COMPANY'S FIRST AMENDED
COMPLAINT RE FORECLOSURE**

HOWARD & HOWARD ATTORNEYS PLLC
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Las Vegas, NV 89169
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corporation; CAMCO PACIFIC
CONSTRUCTION COMPANY, INC., a
California corporation; GEMSTONE
DEVELOPMENT WEST, INC., a Nevada
corporation; FIDELITY AND DEPOSIT
COMPANY OF MARYLAND; SCOTT
FINANCIAL CORPORATION, a North
Dakota corporation; DOES I through X; ROE
CORPORATIONS I through X; BOE
BONDING COMPANIES I through X; LOE
LENDERS I through X, inclusive

Defendants.

AND ALL RELATED CASES AND
MATTERS.

**APCO CONSTRUCTION'S ANSWER TO
ACCURACY GLASS & MIRROR COMPANY'S FIRST AMENDED COMPLAINT RE
FORECLOSURE**

APCO CONSTRUCTION (hereinafter "APCO"), by and through its attorneys, Gwen
Rutar Mullins, Esq. and Wade B. Gochnour of the law firm of Howard and Howard Attorneys
PLLC, hereby files this Answer to Accuracy Glass & Mirror Company's Complaint
(hereinafter "Complaint") and hereby responds and alleges as follows:

THE PARTIES

1. Answering Paragraph 1, 5, 6, 7, and 8 of the Complaint, APCO does not have
sufficient knowledge or information upon which to base a belief as to the truth of the
allegations contained therein, and upon said grounds, denies each and every allegation
contained therein.

2. Answering Paragraphs 2, 3 and 4 of the Complaint, APCO admits the
allegations contained therein.

...

...

FIRST CAUSE OF ACTION

(Breach of Contract Against APCO)

3. Answering Paragraph 9 of the Complaint, APCO repeats and realleges each and every allegation contained in paragraphs 1 and 2 of this Answer to the Complaint as though fully set forth herein.

4. Answering Paragraph 10 of the Complaint, APCO admits that APCO entered into subcontract with Accuracy Glass & Mirror Company, Inc. ("Accuracy") to provide certain glass ad glazing related work, materials and equipment on the Manhattan West Condominium Project. As to the remaining allegations of Paragraph 10 of the Complaint, APCO does not have sufficient knowledge or information upon which to base a belief as to the truth of the allegations contained therein, and upon said grounds, denies each and every allegation contained therein on those basis.

5. Answering Paragraph 11 of the Complaint, APCO admits that Accuracy's services benefited Owner. APCO denies the remaining allegations of Paragraph 11 of the Complaint.

6. Answering Paragraph 12 of the Complaint, APCO admits that the terms of the subcontract with Accuracy speak for themselves. APCO denies the remaining allegations of Paragraph 12 of the Complaint.

7. Answering Paragraph 13 of the Complaint, APCO admits that Accuracy furnished services under subcontract, which subcontract was subsequently ratified and assumed by CPCC and/or Gemstone. APCO denies the remaining allegations of Paragraph 13 of the Complaint.

8. Answering Paragraphs 14, 15, and 16 of the Complaint, APCO denies each and every allegation contained therein.

...

...

...

SECOND CAUSE OF ACTION

(Breach of Contract Against CAMCO)

9. Answering Paragraph 17 of the Complaint, APCO repeats and realleges each and every allegation contained in paragraphs 1 and 8 of this Answer to the Complaint as though fully set forth herein.

10. Answering Paragraph 18 of the Complaint, APCO, upon information and belief, admits the allegations contained therein.

11. Answering Paragraphs 19, 20, 21, 22, 23, and 24 of the Complaint, APCO does not have sufficient knowledge or information upon which to base a belief as to the truth of the allegations contained therein, and upon said grounds, denies each and every allegation contained therein on those basis.

THIRD CAUSE OF ACTION

(Breach of Implied Covenant of Good Faith & Fair Dealing Against APCO)

12. Answering Paragraph 25 of the Complaint, APCO repeats and realleges each and every allegation contained in paragraphs 1 through 11 of this Answer to the Complaint as though fully set forth herein.

13. Answering Paragraphs 26 of the Complaint, APCO, upon information and belief, admits the allegations contained therein.

14. Answering Paragraphs 27, 28 and 29 of the Complaint, APCO does not have sufficient knowledge or information upon which to base a belief as to the truth of the allegations contained therein, and upon said grounds, denies each and every allegation contained therein on those basis.

FOURTH CAUSE OF ACTION

(Breach of Implied Covenant of Good Faith & Fair Dealing Against CAMCO)

15. Answering Paragraph 30 of the Complaint, APCO repeats and realleges each and every allegation contained in paragraphs 1 through 14 of this Answer to the Complaint as though fully set forth herein.

1 16. Answering Paragraphs 31 of the Complaint, APCO, upon information and
2 belief, admits the allegations contained therein.

3 17. Answering Paragraphs 32, 33 and 34 of the Complaint, APCO does not have
4 sufficient knowledge or information upon which to base a belief as to the truth of the
5 allegations contained therein, and upon said grounds, denies each and every allegation
6 contained therein on those basis.

7 **FIFTH CAUSE OF ACTION**

8 **(Unjust Enrichment or in the Alternative Quantum Meriut – Against All Defendants)**

9 18. Answering Paragraph 35 of the Complaint, APCO repeats and realleges each
10 and every allegation contained in paragraphs 1 through 17 of this Answer to the Complaint as
11 though fully set forth herein.

12 19. Answering Paragraphs 36, 37, 38, 39, 40, 41, 42, and 43 of the Complaint,
13 APCO denies all the allegations as they pertain to, or as they are alleged against, APCO. With
14 respect to any allegations that have been asserted against the remaining Defendants, APCO
15 does not have sufficient knowledge or information upon which to base a belief as to the truth of
16 the allegations contained therein, and upon said grounds, denies each and every allegation
17 contained therein.

18 **SIXTH CAUSE OF ACTION**

19 **(Foreclosure of Mechanic's Lien)**

20 20. Answering Paragraph 44 of the Complaint, APCO repeats and realleges each
21 and every allegation contained in paragraphs 1 through 19 of this Answer to the Complaint as
22 though fully set forth herein.

23 21. Answering Paragraphs 45, 46, 47, 48, 49, 50, 51, 52, and 53 of the Complaint,
24 APCO denies all the allegations as they pertain to, or as they are or may be alleged against,
25 APCO. With respect to any allegations that have been asserted against the remaining
26 Defendants, APCO does not have sufficient knowledge or information upon which to base a
27

28 ...