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2 **IN THE COURT OF APPEALS OF THE STATE OF NEVADA**

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Feb 08 2024 02:05 PM
Elizabeth A. Brown
Clerk of Supreme Court

ROCHELLE MEZZANO,

Appellant,

No. 87863-COA

vs.

JOHN TOWNLEY,

Respondent.

_____/

**SUPPLEMENTAL DECLARATION OF JOHN TOWNLEY IN SUPPORT
OF OPPOSITION TO MOTION TO STAY**

COMES NOW, JOHN TOWNLEY, who executes this within the State of
Nevada: I declare under penalty of perjury that the following is true and correct:

1. I am the Respondent herein.
2. I make this declaration of my own personal knowledge, information
and belief.
3. 855 Atlas Court was completely my vision. I worked hard to make it a
reality. From the inception to the final inspection, it was my hard work that built it
with little help from Rochelle. It was my baby. I used my friends in construction to
build the different facets of construction. Rochelle did help with a snag at the city
but the bulk of the project was managed by me. I hired Rochelle's brother to help

1 with the construction and paid him for his work. It was my seat and hard work that
2 built the home.

3 4. The funds for the project came indirectly from the sale of my home on
4 Stockade Drive, Sparks, Nevada that I owned prior to meeting or marrying
5 Rochelle.
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7 5. I managed the property from the day it was finished to the time Rochelle
8 forcefully commandeered the rent from the tenants on 6/01/2022.
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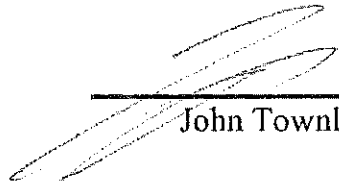
10 6. Rochelle has enacted unimaginable harm to me. The stress and financial
11 loss to me as a result of Rochelle's diabolical tactics used in this divorce action has
12 rendered me unable to work in my field of expertise. I bought, rehabbed, and sold
13 homes in the reno area with investors. It was my primary income. When Rochelle
14 became combative over 4 years ago I felt it not ethically right to expose my
15 investors to Rochelle's serial litigation tactics knowing she would tie up any
16 property me and the investors would buy. With the divorce tying my hands I have
17 been forced to collect social security early causing great loss to future benefits.
18 Rochelle has repeatedly claiming I make a lucrative living working on
19 motorcycles. I have had no income from my hobby for years.
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22 7. Rochelle purchased two homes during the 4 year divorce process, blatantly
23 disregarding the financial restraining order.
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1 8. Rochelle paints a picture of a poor wife that is being harmed by her
2 husband but is merely projecting. In reality it is the other way around. Rochelle
3 has refused to do anything other than file motion after motion even a motion in
4 federal court against the honorable Judge Robb and all her staff that was quickly
5 dismissed with prejudice and a large sanction to discourage others from
6 weaponizing the legal system as she is doing here.
7

9 9. I beg this court for an emergency review of both the appeal and stay
10 currently before the court. Every day I am unable to work and move on with my
11 life is a human tragedy.
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13 EXECUTED this 8th day of February 2024.
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17 _____
18 John Townley
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1 **CERTIFICATE OF SERVICE**

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3 Pursuant to NRCP 5 (b), I hereby certify that I am an employee of Silverman,
4 Kattelman Springgate, Chtd, and on the date set forth below, I served a true copy of
5 the foregoing Supplemental Declaration of John Townley in Support of Opposition
6 to Motion to Stay the party(ies) identified below by:
7

8 ☐ Placing an original or true copy thereof in a sealed envelope, postage
9 prepaid for collection and mailing in the United States Mail at Reno,
10 Nevada to
11

12 ☒ Electronically, using Supreme Court's Eflex system.
13

14 ☐ Email:
15

16 addressed to:

17 F. Peter James, Esq.
18 Law Offices of F. Peter James, Esq.
19 3821 West Charleston Blvd., Ste. 250
20 Las Vegas, NV 89102

21 Under NRS 239B.030 the undersigned affirms the preceding contains no
22 social security number.

23 Dated this 8 day of Feb 2024.
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