

1 CASE NO.: 96-CV-0259

2 DEPT. NO.: I

3 *Sullivan Law Offices*
4 *1650 N. Lucern Street, Ste 204*
5 *Minden, NV 89423*
6
7

8 IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
9 IN AND FOR THE COUNTY OF DOUGLAS

11 JEFFREY C. LAWRENCE,
12 Plaintiff,

PLAINTIFF'S AFFIDAVIT OF
RENEWAL OF JUDGMENT

NRS 17.214

13 vs.

14 TOM ABDOO, d.b.a. MY TREEHOUSE
15 NURSERY

Defendant.
16 _____/

17 COMES NOW the above-named Plaintiff, (hereinafter,
18 "Jeffrey") and renews the Judgment herein, pursuant to the terms
19 of NRS 17.214.

20 A. Date of Judgment. The Judgment, entered and docketed on
21 June 20, 1997, has not been paid in whole or part.

22 B. Date of Expiration. The Judgment would expire on June
23 20, 2003, if not renewed. NRS 11.190. This Affidavit is,
24 therefore, being properly filed within the requisite 90 days of
25 expiration. NRS 17.214(a).

26 1. Parties and Succession. The parties are Jeffrey
27 C. Lawrence ("Jeffrey") and Tom A. Abdo, as set forth in the
28 above caption and the Judgment itself. Jeffrey remains the sole

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1 judgment creditor, without any successor in interest.

2 2. Recording. The Judgment was recorded on June 25,
3 1997, in Douglas County, Book 0697, Page 5290, Document number
4 0415958, a copy of which is attached hereto as Exhibit A.

5 3. Date and Amount of Judgment. The Judgment was
6 dated June 20, 1997, in the amount of \$11,189.35. The Clerk of
7 the Douglas County Court no longer maintains a physical judgment
8 docket book, the records now residing in the Court computer.
9 Therefore, there is no number and page of the court docket in
10 which the Judgment is entered.

11 4. Writ(s) of Execution. According to the Clerk's
12 Office, there are no outstanding writs of execution for
13 enforcement of the Judgment.

14 5. Payments on Judgment. No payments have been made
15 on the Judgment.

16 6. Setoffs or Counterclaims. There are no setoffs or
17 counterclaims in favor of the judgment debtor, and no credits to
18 the Judgment.

19 7. Amount Due. With statutory interest, to date, per
20 the attached Exhibit B Prime Interest Rate history and Judgment
21 Interest spreadsheet, the exact amount of the Judgment due,
22 through March 31, 2003, is \$17,189.52.

23 C. Notification. A copy of this Renewal is being sent to
24 the judgment debtor by certified mail, return receipt requested,
25 at his last known address, as set forth in the attached PROOF OF
26 SERVICE BY MAIL - CERTIFIED, RETURN RECEIPT REQUESTED.

27 ///

28 ///

1 Dated: May 19, 2003

SULLIVAN LAW OFFICES
A Professional Corporation

2
3
4 By: _____

J. D. SULLIVAN
Attorneys for Plaintiff,
JEFFREY C. LAWRENCE

5
6 1650 North Lucerne Street
Minden, NV 89423

7 Telephone: (775) 782-6915
8 Telecopier: (775) 782-3439

9 State of Nevada)
10 County of Douglas) ss.

11
12 I declare, under penalty of perjury, that the foregoing is
13 true and correct.

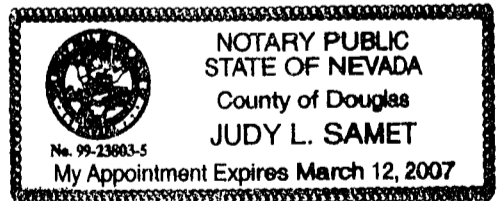
14 Jeffrey C. Lawrence
JEFFREY C. LAWRENCE

15
16 State of Nevada)
17 County of Douglas) ss.

18 On this 22nd day of May, 2003, before me, the
19 undersigned Notary Public in and for said state, personally
20 appeared JEFFREY C. LAWRENCE, personally known to me or proved to
21 me on the basis of satisfactory evidence to be the person(s) whose
22 name(s) is/are subscribed to the within instrument and acknowledged
to me that he/she/they executed same in his/her/their authorized
capacity, and that by his/her/their signature(s) on the instrument
the person(s) or the entity(ies) upon behalf of which the person(s)
acted, executed the instrument.

23 WITNESS my hand and official seal.

24
25 Judy L. Samet
26 My Commission Expires 3-12-07



1 CASE NO. 96-CV-0259

2 DEPT. NO. I

NO.

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D. DALEY

6 IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF

7 IN AND FOR THE COUNTY OF DOUGLAS

9 JEFFREY C. LAWRENCE,
10 f.d.b.a. CARSON VALLEY DOORS,

DEFAULT JUDGMENT

11 Plaintiff,

12 vs.

13 TOM ABDOO, d.b.a. MY
14 TREEHOUSE NURSERY; DOES I-V,
15 inclusive and ROE
16 CORPORATIONS I-V, inclusive,

17 Defendants.

18 _____ /
19 TOM ABDOO, d.b.a., MY TREEHOUSE NURSERY, the named Defendant
20 in the above-entitled action, having been regularly served with
21 Summons on May 8, 1997, and having failed to appear and to answer
22 the Plaintiff's Complaint herein, the legal time for answering
23 said Complaint having expired, and no answer or other appearance
24 within the scope of NRCF 55(b)(2) having been filed or presented,
25 and the default of the above-named Defendant in the premises
26 having been duly entered according to law by the Clerk of the
27 Court; therefore, upon the application of said Plaintiff, judgment
28 is hereby ordered against the Defendant TOM ABDOO, personally,
d.b.a. MY TREEHOUSE NURSERY pursuant to the prayer of said
Complaint.

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EXHIBIT A

BK0697PC5200

MICHAEL SMILEY ROWE
Attorney at Law
P. O. Box 2080 • Minden, NV 89423
(702) 782-8141

MICHAEL SMILEY ROWE
Attorney at Law
P. O. Box 2080 • Minden, NV 89423
(702) 782-8141

1 WHEREFORE, by virtue of the law and by reason of the premises
2 aforesaid:

3 JUDGMENT BY DEFAULT IS HEREBY ENTERED, and the Plaintiff is
4 to have and recover from the Defendant TOM ABDOO, personally,
5 d.b.a. MY TREEHOUSE NURSERY, the sum of \$5,792.59, together with
6 interest in the amount of \$2,517.25 as allowed by NRS 108 for
7 mechanic's and materialmen's liens, together with costs and
8 disbursements incurred in this action amounting to a sum of
9 \$359.51, and together with a reasonable attorney's fee in the
10 amount of \$2,520.00; all for a total in the amount of \$11,189.35.
11 This judgment is to bear interest at the prime rate plus two
12 percent (2%) per annum from the date of service of Summons and
13 Complaint which was effected on May 8, 1997.

14 JUDGMENT rendered this 25th day of June, 1997.

David R. Gamble

DAVID R. GAMBLE
DISTRICT COURT JUDGE

18 Submitted by:
19 Michael Smiley Rowe, Esq.
20 Nevada State Bar No. 1374
21 1638 Esmeralda Avenue
22 P. O. Box 2080
23 Minden, NV 89423
24 (702) 782-8141
25 Attorney for Plaintiff
26 JEFFREY C. LAWRENCE,
27 f.d.b.a. CARSON VALLEY DOORS

CERTIFIED COPY

C:\WP51\DOCS\LAWRENCE\ABDOO\PLEADING\DEF-JUDG.

The document to which this certificate is attached is a full, true and correct copy of the original on file and of record in my office.

DATE: 6/25/97
Breed Clerk of the 9th Judicial District Court
of the State of Nevada, In and for the County of Douglas,

By *J. Thaler* Deputy
2

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EXHIBIT A

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COPY

REQUESTED BY
Michael Smiley Lowe
IN OFFICIAL RECORDS OF
DOUGLAS CO. NEVADA

'97 JUN 25 P3:39

LINDA SLATER
RECORDER

\$ 9.00 PAID OK DEPUTY

EXHIBIT A

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LAWRENCE v. ABDOO

Judgment Interest Per NRS 99.040(1)

Dates: From:	To:	Days in Period	Prime* Plus 2 %	Judgment Amount - CR	Interest Per Day	Total Interest	Balance With Interest	Credits
20-Jun-97	01-Jul-97	11	10.25%	\$11,189	\$3.14	\$34.56	\$11,223.91	\$0.00
01-Jul-97	01-Jan-98	184	10.50%	\$11,189	\$3.22	\$592.27	\$11,816.18	\$0.00
01-Jan-98	01-Jul-98	181	10.50%	\$11,189	\$3.22	\$582.61	\$12,398.80	\$0.00
01-Jul-98	01-Jan-99	184	10.50%	\$11,189	\$3.22	\$592.27	\$12,991.07	\$0.00
01-Jan-99	01-Jul-99	181	9.75%	\$11,189	\$2.99	\$541.00	\$13,532.06	\$0.00
01-Jul-99	01-Jan-00	184	9.75%	\$11,189	\$2.99	\$549.96	\$14,082.03	\$0.00
01-Jan-00	01-Jul-00	182	10.25%	\$11,189	\$3.14	\$571.88	\$14,653.91	\$0.00
01-Jul-00	01-Jan-01	184	11.50%	\$11,189	\$3.53	\$648.68	\$15,302.59	\$0.00
01-Jan-01	01-Jul-01	181	11.50%	\$11,189	\$3.53	\$638.10	\$15,940.69	\$0.00
01-Jul-01	01-Jan-02	184	8.75%	\$11,189	\$2.68	\$493.56	\$16,434.24	\$0.00
01-Jan-02	01-Jul-02	181	6.75%	\$11,189	\$2.07	\$374.54	\$16,808.78	\$0.00
01-Jul-02	01-Jan-03	184	6.75%	\$11,189	\$2.07	\$380.74	\$17,189.52	\$0.00
01-Jan-03	31-Mar-03	90	6.25%	\$11,189	\$1.92	\$172.44	\$17,361.96	\$0.00
Interest Subtotal.....						\$6,000.17		
Judgment With Interest and Credits.....							\$17,189.52	
Current Per Diem From Last Date Listed.....								\$1.92

* As ascertained by the Nevada Commissioner of Financial Institutions

EXHIBIT B

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PRIME INTEREST RATE

NRS 99.040(1) requires:

*"When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1, or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due,"**

Following is the prime rate as ascertained by the Commissioner of Financial Institutions:

January 1, 2002	4.75%
July 1, 2001	6.75%
January 1, 2001	9.50%
July 1, 2000	9.50%
January 1, 2000	8.25 %
July 1, 1999	7.75 %
January 1, 1999	7.75 %
July 1, 1998	8.50 %
January 1, 1998	8.50 %
July 1, 1997	8.50 %
January 1, 1997	8.25 %
July 1, 1996	8.25 %
January 1, 1996	8.50 %
July 1, 1995	9.00 %
January 1, 1995	8.50 %
July 1, 1994	7.25 %
January 1, 1994	6.00 %
July 1, 1993	6.00 %
January 1, 1993	6.00 %
July 1, 1992	6.50 %
January 1, 1992	6.50 %
July 1, 1991	8.50 %
January 1, 1991	10.00 %
July 1, 1990	10.00 %
January 1, 1990	10.50 %
July 1, 1989	11.00 %
January 1, 1989	10.50 %
July 1, 1988	9.00 %
January 1, 1988	8.75 %
July 1, 1987	8.25 %

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*** Attorney General Opinion No. 98-20:**

If clearly authorized by the creditor, a collection agency may collect whatever interest on a debt its creditor would be authorized to impose. A collection agency may not impose interest on any account or debt where the creditor has agreed not to impose interest or has otherwise indicated an intent not to collect interest. Simple interest may be imposed at the rate established in NRS 99.040 from the date the debt becomes due on any debt where there is no written contract fixing a different rate of interest, unless the account is an open or store accounts as discussed herein. In the case of open or store accounts, interest may be imposed or awarded only by a court of competent jurisdiction in an action over the debt.

COOPER

