

APN# 1418-27-411-006



KAREN ELLISON, RECORDER

Recording Requested by/Mail to:

Name: Alverson Taylor
Address: 7401 W. Charleston
City/State/Zip: Las Vegas, NV 89117

Mail Tax Statements to:

Name: _____
Address: _____
City/State/Zip: _____

Application of Foreign Judgment
Title of Document (required)

----- (Only use if applicable) -----

The undersigned hereby affirms that the document submitted for recording contains personal information as required by law: (check applicable)

- Affidavit of Death – NRS 440.380(1)(A) & NRS 40.525(5)
- Judgment – NRS 17.150(4)
- Military Discharge – NRS 419.020(2)

Matthew Pruitt

Signature

Matthew Pruitt

Printed Name

This document is being (re-)recorded to correct document # _____, and is correcting

Alvin D. Larson
CLERK OF THE COURT

1 ALVERSON, TAYLOR,
2 MORTENSEN & SANDERS
3 KURT R. BONDS, ESQ.
4 Nevada Bar #6228
5 MATTHEW PRUITT, ESQ.
6 Nevada Bar #12474
7 7401 W. Charleston Boulevard
8 Las Vegas, NV 89117
9 (702) 384-7000
10 efile@alversontaylor.com
11 Attorney for Dean Properties, LLC,
12 James V. Dean and Marla D. Dean

DISTRICT COURT
CLARK COUNTY, NEVADA

-.*

11 DEAN PROPERTIES, LLC, JAMES V.
12 DEAN, and MARLA D. DEAN,

CASE NO.: A- 16 - 742128 - F
DEPT. NO.: V

13 Plaintiffs,

14 vs.

**APPLICATION OF FOREIGN
JUDGMENT**

15 SYNCHRONIZED ORGANIZATIONAL
16 SOLUTIONS INTERNATIONAL LTD and
17 DAVID B. KAPLAN,

18 Defendant.

19 COMES NOW DEAN PROPERTIES, LLC, by and through its attorneys, ALVERSON,
20 TAYLOR, MORTENSEN & SANDERS, and hereby files its Foreign Judgment pursuant to NRS 17,
21 specifically NRS 17.350, and registers an exemplified copy of the Judgment, attached hereto as
22 "Exhibit 1" as follows:
23

24 ///

25 ///

26 ///

27 ///

28

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

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Judgment on Consent from the United States District Court for the Eastern District of Virginia Alexandria Division, signed by the Honorable Liam O'Grady and filed on June 21, 2016.

DATED this 22 day of August, 2016.

ALVERSON, TAYLOR,
MORTENSEN, & SANDERS



KURT R. BONDS, ESQ.

Nevada Bar #6228

MATTHEW PRUITT, ESQ.

Nevada Bar #12474

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efile@alversontaylor.com

Attorney for Dean Properties, LLC,

James V. Dean, and Marla D. Dean

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DECLARATION OF MATTHEW PRUITT IN SUPPORT OF PLAINTIFF DEAN PROPERTIES, LLC'S FILING OF FOREIGN JUDGMENT

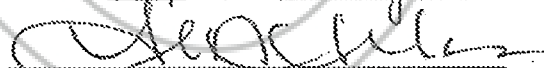
STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

MATTHEW PRUITT being first duly sworn, deposes and says:

1. This Affidavit is being made in connection with Plaintiff's Filing of Foreign Judgment pursuant to NRS 17.360.
2. I am counsel for the Plaintiff in this matter with knowledge of the things testified to in this affidavit.
3. The name and last known address of the judgment debtors are as follows: David B. Kaplan and Synchronized Organizational Solutions International Ltd., 1314-B Cave Rock Drive, Glenbrook, NV 89413.
4. The name and last known address of the judgment creditor are as follows: Dean Properties, LLC, 9420 Developers Drive, Manassas, VA 20109.
5. The judgment is valid and enforceable, and has not been satisfied.
6. To date, no payments have been made and nothing has been collected on the judgment.
7. FURTHER YOUR AFFIANT SAYETH NAUGHT.


MATTHEW PRUITT

SUBSCRIBED and SWORN to before
me this 22 day of August, 2016.


NOTARY PUBLIC

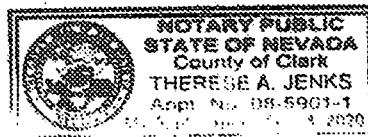


Exhibit 1



UNITED STATES DISTRICT COURT

Eastern

District of

Virginia

EXEMPLIFICATION CERTIFICATE

I, Fernando Galindo, Clerk of this United States District Court, keeper of the records and seal, certify that the attached documents:
1:16cv50 Dean Properties, LLC, et al. v. Synchronized Organizational Solutions International LTD, et al.

Consent Judgment Order dated 6/21/16

are true copies of records of this Court.

In testimony whereof I sign my name and affix the seal of this Court, in this District, at
Alexandria on 6/27/2016
City *Date*

Fernando Galindo
Clerk

[Signature]
(By) Deputy Clerk

I, Liam O'Grady, a Judicial Officer of this Court, certify that Fernando Galindo, named above, is and was on the date noted, Clerk of this Court, duly appointed and sworn, and keeper of the records and seal, and that this certificate, and the attestation of the record, are in accordance with the laws of the United States.

June 28, 2016
Date

[Signature]
Signature of Judge

United States District Judge
Title

I, Fernando Galindo, Clerk of this United States District Court, keeper of the seal, certify that the Honorable Liam O'Grady,
Judge

named above, is and was on the date noted a Judicial Officer of this Court, duly appointed, sworn and qualified, and that I am well acquainted with the Judge's official signature and know and certify the above signature to be that of the Judge.

In testimony whereof I sign my name, and affix the seal of this Court at U.S. District Court
Alexandria in this State, on 6/29/16
City *Date*

Fernando Galindo
Clerk

[Signature]
(By) Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEAN PROPERTIES, LLC

and

JAMES V. DEAN

and

MARLA D. DEAN

Plaintiffs,

Case No. 1:16-CV-00050-LO-TCB

v.

SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL LTD

and

DAVID B. KAPLAN

Defendants.

CONSENT JUDGMENT ORDER

By the agreement of the parties, and it appearing proper to do so, the Court hereby **ORDERS** that the Plaintiff, Dean Properties, LLC, have judgment against the Defendants, Synchronized Organizational Solutions International Ltd. and David B. Kaplan, jointly and severally, in the amount of Three Million Nine Hundred Seventy Thousand and 00/100 Dollars (\$3,970,000.00), plus attorney's fees of One Hundred Ten Thousand and 00/100 Dollars (\$110,000.00), for a total judgment amount of Four Million Eighty Thousand and 00/100 Dollars

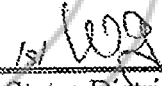
(4,080,000.00), plus post-judgment interest from the date of entry of this Consent Judgment Order at the rate of 6% per year.

In connection with the entry of this Consent Judgment Order, the Defendant, David B. Kaplan, has not been adjudicated to have committed fraud or any other wrongdoing.

The Clerk is directed to enter this Consent Judgment.

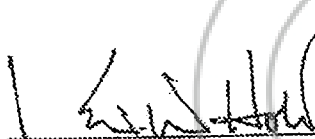
This case shall be removed from the Court's active docket, without prejudice to such post-judgment collection proceedings as may be appropriate.

ENTERED this 21st day of June, 2016.



Liam O'Grady, United States District Judge
United States District Judge

Prepared by:



Kevin W. Holt (VSB No. 42866)
GENTRY LOCKE
900 Sun Trust Plaza
P.O. Box 40013
Roanoke, Virginia 24022-0013
(540) 983-9300
Fax: (540) 983-9400
holt@gentrylocke.com


Counsel for Plaintiffs

A TRUE COPY, TESTE:
CLERK, U.S. DISTRICT COURT

BY 

DEPUTY CLERK

Seen and Agreed:



Matthew B. Kaplan (VSB No. 51027)
The Kaplan Law Firm
509 N. Jefferson Street
Arlington, VA 22205
Phone: (703) 665-9529
Fax: (888) 958-1366
mbkaplan@thekaplanlawfirm.com


Counsel for Defendants

Seen and Agreed:

**SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL LTD.**

By: DAVID B. KAPLAN

Its: DIRECTOR



David B. Kaplan

Defendants

Seen and Agreed:

Matthew B. Kaplan (VSB No. 51027)
The Kaplan Law Firm
509 N. Jefferson Street
Arlington, VA 22205
Phone: (703) 665-9529
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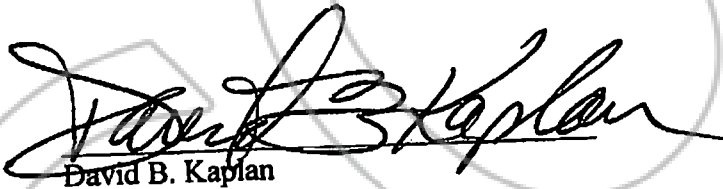
Counsel for Defendants

Seen and Agreed:

**SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL LTD.**

By: DAVID B. KAPLAN

Its: DIRECTOR


David B. Kaplan

Defendants

ALVERSON, TAYLOR, MORTENSEN & SANDERS
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DISTRICT COURT
CLARK COUNTY, NEVADA

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11 DEAN PROPERTIES, LLC, JAMES V.
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CASE NO.:
DEPT. NO.:

13 Plaintiffs,

14 vs.

15 SYNCHRONIZED ORGANIZATIONAL
16 SOLUTIONS INTERNATIONAL LTD and
17 DAVID B. KAPLAN,

18 Defendant.

19 **INITIAL APPEARANCE FEE DISCLOSURE (NRS CHAPTER 19)**

20 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are
21 submitted for parties appearing in the above entitled action as indicated below:
22

23 New Complaint Fee	23 1 st Appearance Fee
24 <input type="checkbox"/> \$1530 <input type="checkbox"/> \$520 <input type="checkbox"/> \$299 X <input checked="" type="checkbox"/> \$270.00	24 <input type="checkbox"/> \$1483.00 <input type="checkbox"/> \$537.00 <input type="checkbox"/> \$223.00

25 Name: DEAN PROPERTIES, LLC,

26 JAMES V. DEAN

X ~~\$30~~

27 MARLA D. DEAN

X ~~\$30~~

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X Total of Continuation Sheet Attached

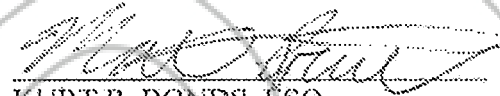
TOTAL REMITTED: (Required)

Total Paid

~~\$ 330.00~~

DATED this 22 day of August, 2016.

ALVERSON, TAYLOR,
MORTENSEN, & SANDERS


KURT R. BONDS, ESQ.

Nevada Bar #6228

MATTHEW PRUITT, ESQ.

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efile@alversonstaylor.com

Attorney for Dean Properties, LLC,

James V. Dean, and Maria D. Dean

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CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE ORIGINAL ON FILE


CLERK OF THE COURT

SEP 08 2016

KB/23907