



KAREN ELLISON, RECORDER

APN# _____

Recording Requested by/Mail to:

Name: Assly Sayyar, Attorney

Address: 2348 Foothill Drive

City/State/Zip: Vista, California 92084

Mail Tax Statements to:

Name: _____

Address: _____

City/State/Zip: _____

Affidavit of Plaintiff in Support of Renewal of Judgment

Title of Document (required)

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

The undersigned hereby affirms that the document submitted for recording
DOES contain 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)

Signature

Printed Name

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

COPY

FILED

2021 MAR 29 PM 1:29
JUSTICE OF THE PEACE
BY _____
CLERK

1 ASSLY SAYYAR, ATTORNEY AT LAW INC.
2 ASSLY SAYYAR, ESQ.
3 Nevada Bar No. 9178
4 5550 Painted Mirage Rd. #320
5 Las Vegas, Nevada 89149
6 Tel: 760-542-8717
7 Fax: 760-4443560
8 assly@vistalawyer.net

9 *Attorneys for D.A.N. Joint Venture III, L.P.*
10 *Plaintiff Successor in Interest*

11 CANON LAW SERVICES, LLC
12 ROBERT J.B. FLUMMERFELT, ESQ. (SBN 11122)
13 500 N. Rainbow Blvd., Suite 300
14 Las Vegas, NV 89107

15 *SCR 42.1 Designee Counsel*

16 **JUSTICE COURT OF CARSON CITY**
17 **CARSON CITY COUNTY, NEVADA**

18 NCO FINANCIAL SYSTEMS, INC., as
19 assignee of CHASE MANHATTAN BANK,

Case No. JO75603

20 Plaintiff,

**AFFIDAVIT OF PLAINTIFF IN
SUPPORT OF RENEWAL OF
JUDGMENT PURSUANT TO NRS 17.214**

21 vs.

22 MIKE T. RAGLAND, individually; and
23 DOES I through X, inclusive

24 Defendants.

25 STATE OF OHIO
26 COUNTY OF TRUMBULL } ss.

27 CINDY KRUSELY, being first duly sworn, deposes and says:

28 1. I am an authorized agent for D.A.N. JOINT VENTURE III, L.P., Plaintiff Successor in Interest to NCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK (hereinafter "Judgment Creditor" or "Plaintiff"). I am over the age of 18 and am competent and am personally knowledgeable of the facts contained herein to make this affidavit.

2. NCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK obtained a default judgment against Defendant MIKE T. RAGLAND, individually ("Defendant")

1 on September 5, 2003 in the Justice Court of Carson City, County of Carson City, state of Nevada
2 (the "Judgment"), a true and correct copy of which is attached hereto as Exhibit 1.

3 3. The Judgment was renewed on August 21, 2009 and again on June 24, 2015. A true and
4 correct copy of the August 21, 2009 Affidavit of Renewal is attached hereto as Exhibit 2. A true and
5 correct copy of the June 24, 2015 Affidavit of Renewal is attached hereto as Exhibit 3.

6 4. The Judgment was assigned to Plaintiff Success or Interest D.A.N. JOINT VENTURE III,
7 L.P. on or around January 24, 2006. A true and correct copy of the Assignment as filed and recorded
8 is attached hereto as Exhibit 4.

9 5. An Abstract of Judgment was issued in this action on March 25, 2019 and recorded in
10 Douglas County, Nevada on April 2, 2019, Instrument No. 2019-927408.

11 6. The Judgment accrues interest at the contractual rate of 24% per annum or \$4.79 per diem
12 from October 22, 2002 through the current date.

13 7. There are no outstanding writs of execution for enforcement of the Judgment.

14 8. Judgment Creditor has not been successful in collection efforts and \$0 has been collected or
15 paid towards the Judgment balance.

16 9. The total amount of the Judgment due against Defendant as of February 25, 2021 is as
17 follows: Principal of \$7,187.02, interest of \$31,637.26, costs of \$296.00, and \$1,796.75 in attorneys
18 fees for a grand total of \$40,917.03. Interest currently continues to accrue at a rate of 24% per annum
19 or \$4.79 per day.

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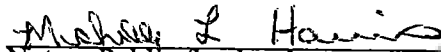
1 10. The six year statute of limitations applicable to the original Judgment expires on or about
2 June 24, 2021. As such, this Affidavit has been filed within the 90 days before the date the
3 Judgment expires by limitation as required by NRS 17.214(1)(a).

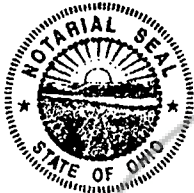
4 FURTHER AFFIANT SAYETH NAUGHT.

5 Dated 12th day of March, 2021.

6
7 
8 CINDY KRUSELEY

8 Subscribed and Sworn before me on this
9 12th day of March, 2021.

10 
11 Notary Public for the above state and county



Michelle L. Harris
Resident Trumbull County
Notary Public, State of Ohio
My Commission Expires: December 5, 2021

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AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding document, **AFFIDAVIT OF PLAINTIFF IN SUPPORT OF RENEWAL OF JUDGMENT PURSUANT TO NRS 17.214** filed in case number JO75603 does not contain the social security number of any person.

Dated this 22nd day of March, 2021.

ASSLY SAYYAR ATTORNEY AT LAW


ASSLY SAYYAR, ESQ. (SBN 9178)
5550 Painted Mirage Rd. #320
Las Vegas, Nevada 89149
Attorney for Plaintiff Successor In Interest
D.A.N. Joint Venture III, L.P.

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CERTIFICATE OF SERVICE

Pursuant to NRCp 5(b), I certify that I am an employee of the Assly Sayyar, Attorney at Law, Inc., and that on this date, I served the following **AFFIDAVIT OF PLAINTIFF IN SUPPORT OF RENEWAL OF JUDGMENT PURSUANT TO NRS 17.214**, upon all parties to this action by:

	Placing an original or true copy thereof in a sealed enveloped place for collection and mailing in the United States Mail, postage paid, following the ordinary business practices;
	Hand Delivery
	Facsimile
	Overnight Delivery
X	Certified Mail, Return Receipt Requested.
	E-Service Via Odyssey

addressed as follows:

Mike T. Ragland
1553 Downs Drive
Minden, Nevada 89423

Dated the 23rd day of March, 2021.



An employee of Assly Sayyar, Attorney at Law, Inc.


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AFFIRMATION PURSUANT TO NRS 239B.303

The undersigned does hereby affirm that the preceding document, filed does NOT contain the social security number or any person.

Dated this 22nd day of March, 2021.

ASSLY SAYYAR, ATTORNEY AT LAW



Assly Sayyar, Esq. (SBN)
Attorney for Plaintiff

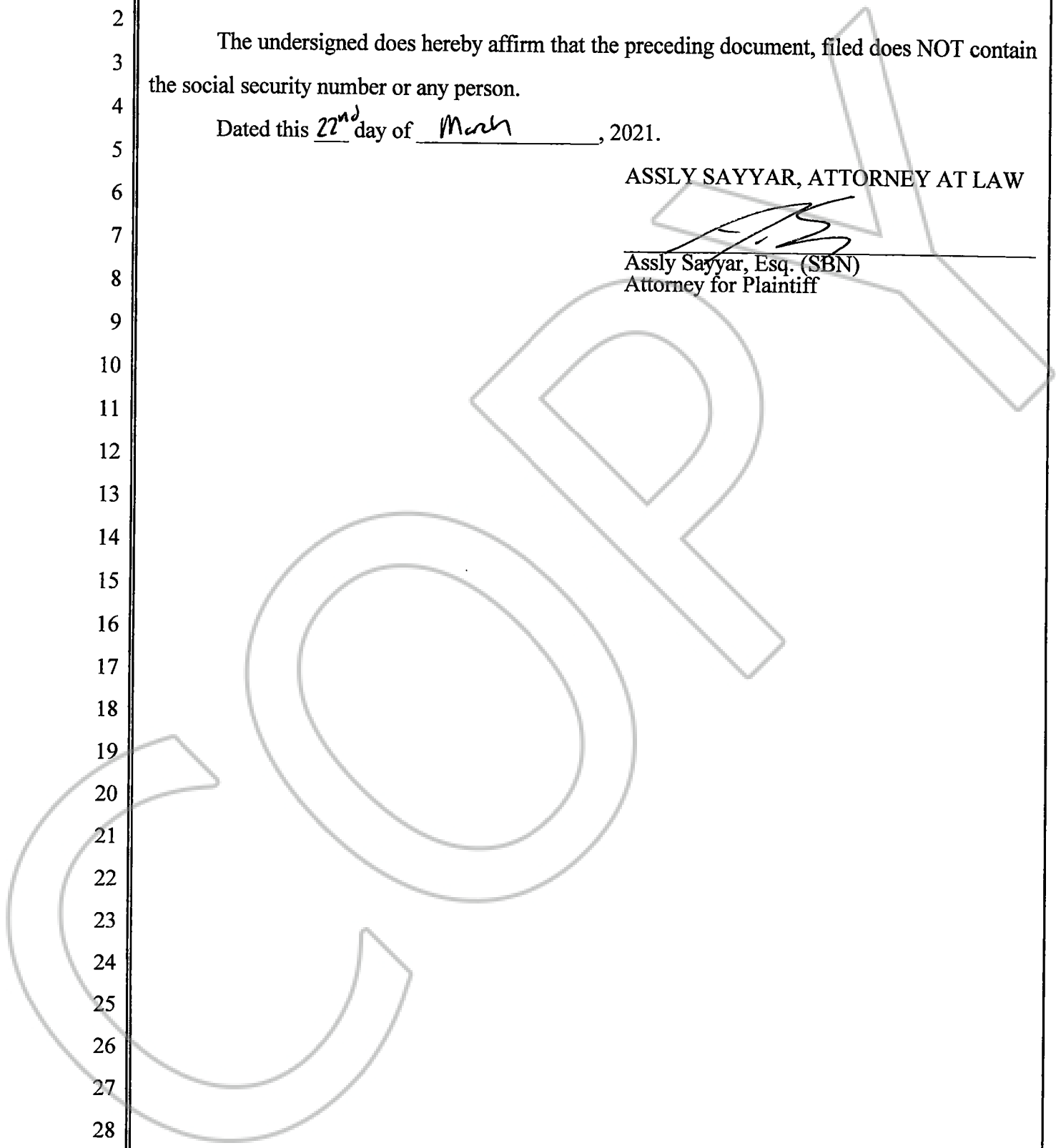


Exhibit 1

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Exhibit 1

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Case No. JO75603
Dept. No.

2003 SEP -5 PM 4:14

JUSTICE OF THE PEACE

IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP

COUNTY OF CARSON CITY, STATE OF NEVADA

CLERK

NCO FINANCIAL SYSTEMS, INC.,
as assignee of CHASE MANHATTAN
BANK,

Plaintiff,

Vs.

MIKE T. RAGLAND, individually;
and DOBS I through X,
inclusive,

Defendant.

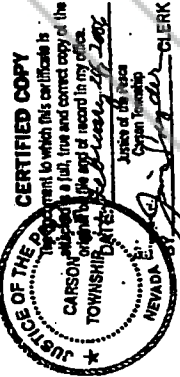
DEFAULT JUDGMENT

MIKE T. RAGLAND, Defendant herein, having been regularly served with Summons and having failed to appear and answer the Plaintiff's Complaint on file herein, the legal time for answering having expired, the Default of Defendant having been duly entered according to law, Default Judgment is hereby entered against Defendant pursuant to prayer of said Complaint.

WHEREFORE, by virtue of the law and by reason of the premises aforesaid,

IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff do have and recover from Defendant the sum of \$7,187.02, plus interest at the

351369



28
Law Offices
Curtis & Erickson
201 W. Nevada Blvd.
Suite 200
Las Vegas
Nevada 89101

1 Case No. J075603

2 Dept. No.

3
4 contractual rate of 24% per annum from October 22, 2002 on the
5 unpaid principal balance; attorneys' fees in the sum of \$174,76
6 ; together with Plaintiff's costs and disbursements incurred in the
7 sum of \$296.00.

8 DATED this 5th day of Sept, 2003.

9
10 *John Ray*
11 JUSTICE OF THE PEACE

12 Submitted by:

13 CALLISTER & REYNOLDS

14 *Ronald H. Reynolds*
15 RONALD H. REYNOLDS, ESQ.
16 Nevada Bar #00027,
17 823 Las Vegas Blvd. South
18 Las Vegas, Nevada 89101
19 Attorneys for Plaintiff

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Exhibit 2

COPY

Exhibit 2

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CLERK

BY  CLERK

RONALD H. REYNOLDS, ESQ.
Nevada Bar #000827
CALLISTER & REYNOLDS
823 Las Vegas Blvd. South
Las Vegas, Nevada 89101
702-385-3343
Attorneys for Plaintiff
20023250

JUSTICE COURT CARSON CITY TOWNSHIP
Carson City County, NEVADA

NCO FINANCIAL SYSTEMS, INC.,
as assignee of CHASE MANHATTAN
BANK,

Plaintiff(s),

-vs-

MIKE T. RAGLAND, individually; and
DOES 1 through X,
inclusive,

Defendant(s).

CASE NO. JO75603
DEPT. NO.
DOCKET NO.

PP52-1130

AFFIDAVIT OF RENEWAL OF JUDGMENT

STATE OF NEVADA }
County of Clark } ss.

RONALD H. REYNOLDS, ESQ., being first duly sworn upon oath, deposes and says:

1. That affiant is a duly licensed and practicing attorney in the State of Nevada and is personally knowledgeable concerning the facts circumstances surrounding this matter and is therefore competent to testify herein.

2. That Judgment, in case number JO75603, was entered in favor of NCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK, and against Judgment Debtor, MIKE T. RAGLAND, on September 5, 2003 and recorded in County of Carson City, Nevada.

CALLISTER & REYNOLDS
100 Las Vegas Blvd. South
Las Vegas, Nevada 89101
(702) 385-3343

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3. That the amount of said Judgment was for \$7,187.02 plus interest at the contractual rate of 24% per annum from October 22, 2002 on the unpaid principal balance; attorneys' fees in the sum of \$1,798.76; together with Plaintiff's costs and disbursements incurred in the sum of \$286.00.

4. That there is no outstanding Writ of Execution for enforcement of the Judgment.

5. That NCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK, has been unable to collect the Judgment amount.

6. There are no setoffs or counterclaims in favor of the Judgment Debtor.

7. There has not been any payments on the Judgment.

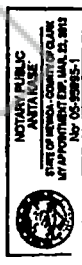
8. That amount of \$9,278.77, plus interest at the contractual rate of 24% per annum from October 22, 2002, on the unpaid principal balance remains due and owing.

9. Further your affiant sayeth not.


RONALD H. REYNOLDS, ESQ.

SUBSCRIBED and SWORN to before me this 20th day of July, 2007.


NOTARY PUBLIC in and for said County and State.



Law Office
CALISTER & REYNOLDS
100 W. HARRIS ST., SUITE 200
LAS VEGAS, NEVADA 89101
PHONE 702-399-1943

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2 JUSTICE COURT CARSON CITY TOWNSHIP
3 Carson City County, Nevada
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5 AFFIRMATION
6 Pursuant to NRS 238B.030

7 The undersigned does hereby affirm that the preceding document, AFFIDAVIT OF
8 RENEWAL OF JUDG filed in case number: JO75603

9 Document does not contain the social security number of any person

10 -OR-

11 Document contains the social security number of a person as required by:

12 A specific state or federal law, to wit:

13 _____
14 (State specific state or federal law)

15 -OR-

16 For the administration of a public program

17 -OR-

18 For an application for a federal or state grant

19 Date: July 23, 2008

20 CALLISTER & REYNOLDS

21
22 

23 RONALD H. REYNOLDS, ESQ.
24 Nevada Bar #000827
25 Attorneys for Plaintiff
26 823 Las Vegas Blvd. South
27 Las Vegas, Nevada 89101
28

CALLISTER & REYNOLDS
Law Office
823 Las Vegas Blvd. South
Las Vegas, Nevada 89101
Phone No. 702.733.1111

Exhibit 3

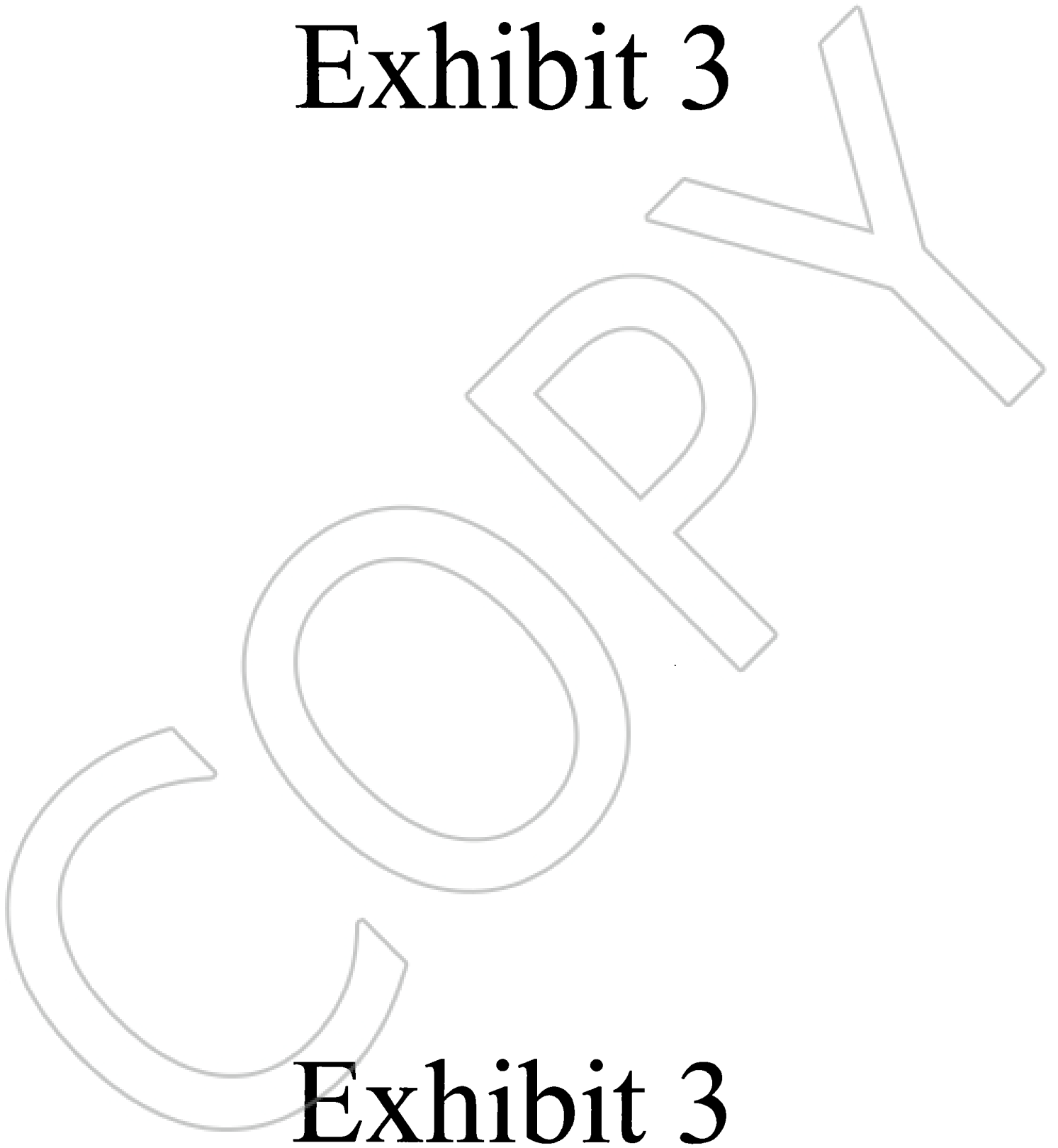


Exhibit 3

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JUSTICE OF THE PEACE
BY: H
CLERK

RONALD H. REYNOLDS, ESQ.
Nevada Bar #000927
REYNOLDS & ASSOCIATES
823 Las Vegas Blvd. South, Suite 280
Las Vegas, Nevada 89101
702-445-7000
Attorneys for Plaintiff
20023250 3437
courtfiling@reynoldslawryca.com

JUSTICE COURT CARSON CITY TOWNSHIP
Carson City COUNTY, NEVADA

NCO FINANCIAL SYSTEMS, INC.
as assignee of CHASE MANHATTAN
BANK,

Plaintiff(s),

MIKE T. RAGLAND, individually, and
DOES I through X,
inclusive,

Defendant(s).

CASE NO. J075603
DEPT. NO.

CONFORMED COPY
HAS NOT BEEN COMPARED
TO THE ORIGINAL

RECORDED AT THE
REQUEST OF
2015 JUN 24 AM 11:28
FILE # 055109
MANHATTAN
CARSON CITY RECORDS

AFFIDAVIT FOR RENEWAL OF JUDGMENT

STATE OF NEVADA } ss.
County of Clark }

RONALD H. REYNOLDS, ESQ., being first duly sworn upon oath, deposes and says:

1. That affiant is a duly licensed and practicing attorney in the State of Nevada and is personally knowledgeable concerning the facts circumstances surrounding this matter and is therefore competent to testify herein.
2. That judgment, in case number J075603, was entered in favor of NCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK, and against Judgment Debtor, MIKE T. RAGLAND, on August 21, 2009.

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3. That the amount of said judgment was for \$7,187.02 plus interest at the contractual rate of 24% per annum from October 22, 2002 on the unpaid principal balance; attorneys' fees in the sum of \$1,796.75; together with Plaintiff's costs and disbursements incurred in the sum of \$296.00.

4. That there is no outstanding Writ of Execution for enforcement of the judgment.

5. That INCO FINANCIAL SYSTEMS, INC., as assignee of CHASE MANHATTAN BANK, has been unable to collect the judgment amount.

6. There are no setoffs or counterclaims in favor of the judgment Debtor.

7. There has not been any payments on the judgment.

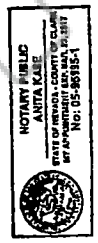
8. The total judgment as of May 1, 2015 is \$31,309.41, inclusive of all costs and fees, along with interest accruing at 24% per annum from August 21, 2009; the date of judgment and Plaintiff hereby renews this judgment for that amount pursuant to Statute.

9. Further your affiant says not.

SUBSCRIBED and SWORN to before me this 14th day of May, 2015.

[Signature]
NOTARY PUBLIC in and for said County and State.

[Signature]
RONALD H. REYNOLDS, ESQ.



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Exhibit 4

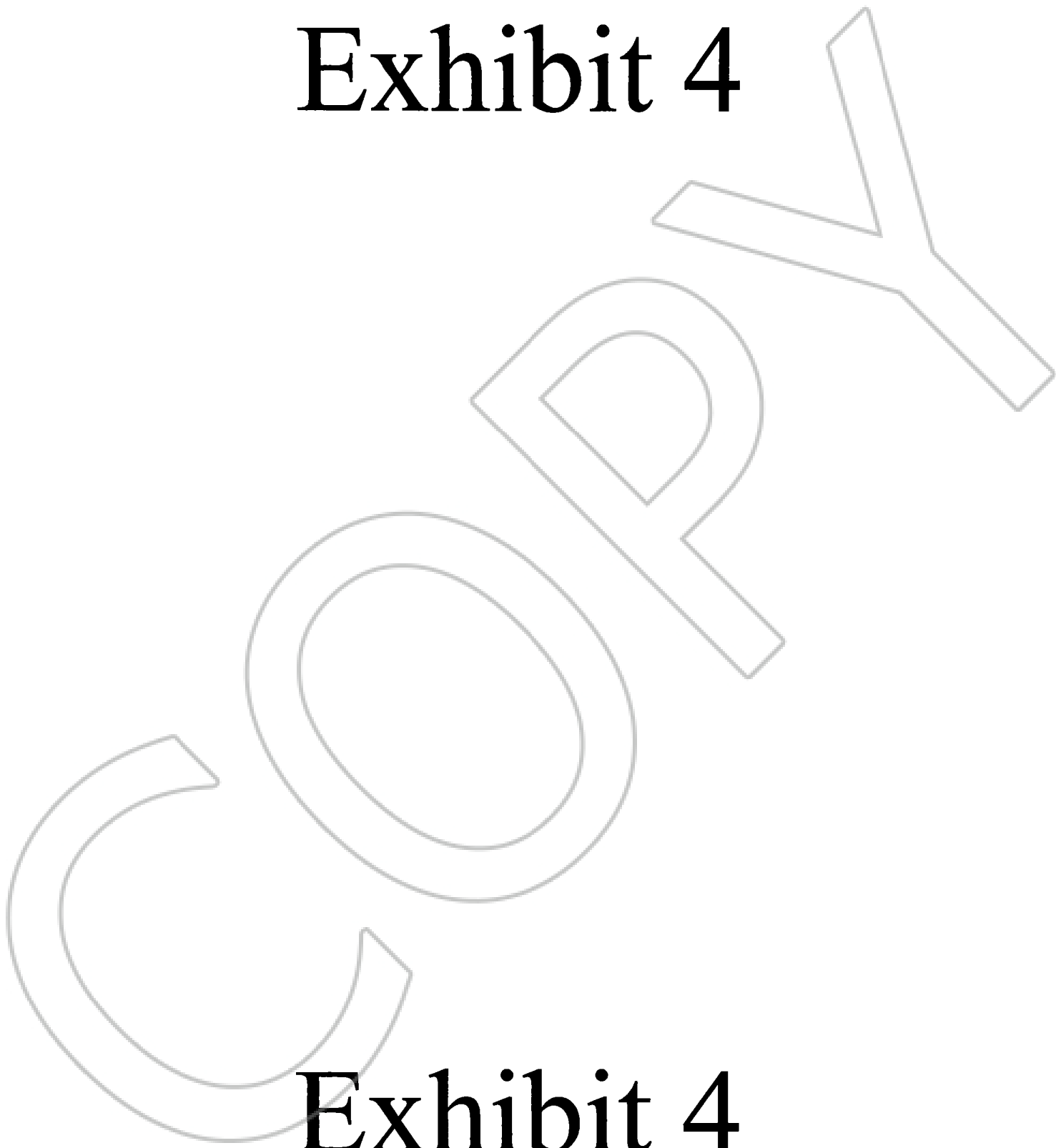


Exhibit 4

Case No. J075603
Dept. No.

2006 FEB -6 PM 4:38

IN THE JUSTICE COURT OF CARSON CITY TOWNSHIP
COUNTY OF CARSON CITY, STATE OF NEVADA

NCO FINANCIAL SYSTEMS, INC.,
as assignee of CHASE MANHATTAN BANK
Plaintiff,

Vs.

MIKE T. RAGLAND, individually;
and DOES I through X, inclusive,
Defendant.

BY [Signature]
CLERK

ASSIGNMENT OF JUDGMENT

For good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, NCO PORTFOLIO MANAGEMENT, INC., PARENT CORPORATION OF CREDITRUST SPV 99-2, LLC, a Delaware limited liability company, its predecessors, successors, assigns, subsidiaries and affiliates, with offices located at 3763 Howard Hughes Parkway, Las Vegas, Nevada 89109 (hereinafter the "Assignor"), hereby transfers, assigns and conveys without recourse unto D.A.N. JOINT VENTURE III, L. P., an Ohio limited partnership located at 100 North Center Street, Newton Falls, Ohio 44444 (hereinafter the "Assignee"), all of Assignor's right, title, interest, powers and options in, if any, in the Judgment rendered in Case No. J075603, in the Justice Court, Carson City Township, County of Carson City, Nevada, wherein NCO Financial Systems, Inc., as assignee of Chase Manhattan Bank was the Plaintiff and Mike T. Ragland was the Defendant(s). Said Judgment was filed on September 5, 2003.

In witness whereof, the undersigned has hereunto set its hand by its duly authorized officer this _____ day of _____, 2006.

[Signature]
Witness
[Signature]
Witness

NCO PORTFOLIO MANAGEMENT, INC., PARENT CORPORATION OF CREDITRUST SPV 99-2, LLC

By: [Signature]
Name: Joshua Gindin
Title: Executive Vice President

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF MONTGOMERY)

SS: 352751

On this, the 24th day of January, 2006, before me a notary public, the undersigned officer, personally appeared Joshua Gindin, Executive Vice President of NCO Portfolio Management, Inc., known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

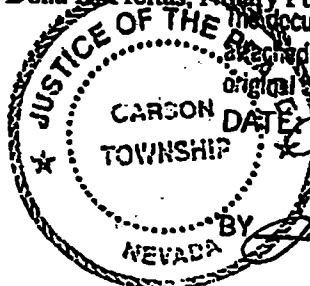
In witness hereof, I hereunto set my hand and official seal.

(Notarial Seal)

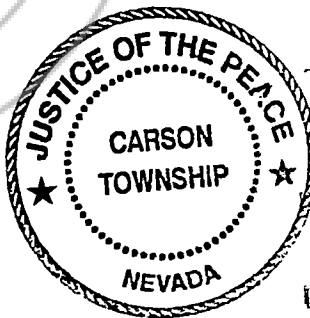
NOTARIAL SEAL
Dona K. Freitas, Notary Public
Horseshoe Twp., Montgomery County
My commission expires August 13, 2008

PREPARED BY: [Signature]
D.A.N. JOINT VENTURE III, L.P.
100 North Center Street, Newton Falls, OH 44444-1321
(330) 872-0918, Debtor: Mike T. Ragland
Our File No. PPS27730, CAPPS27AJ-DAN III-mtdoc

[Signature]
Dona K. Freitas, Notary Public
CERTIFIED COPY
This 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: January 6, 2006
Justice of the Peace
Carson Township
BY [Signature] CLERK



COPY



CERTIFIED COPY

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

MAR 29 2021

DATE: _____
BY: *[Signature]* Justice of the Peace
Carson Township CLERK