

DOUGLAS COUNTY, NV

2024-1007401

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STEWART TITLE GUARANTY - COMMERCIAL

SHAWNYNE GARREN, RECORDER

**RECORDING COVER PAGE**

(Must be typed or printed clearly in BLACK ink only  
and avoid printing in the 1" margins of document)

**APN# 1319-30-544-000 thru 054**

(11 digit Assessor's Parcel Number may be obtained at:  
<http://redrock.co.clark.nv.us/assrealprop/ownr.aspx>)

**TITLE OF DOCUMENT**

(DO NOT Abbreviate)

**NOTICE OF FULL RELEASE OF LIS PENDENS**

Document Title on cover page must appear EXACTLY as the first page of the document  
to be recorded.

**RECORDING REQUESTED BY:**

**Stewart Title Guaranty Company**

**RETURN TO: Name Gunderson Law Firm**

**Address 3895 Warren Way**

**City/State/Zip Reno, Nevada 89509**

**MAIL TAX STATEMENT TO: (Applicable to documents transferring real property)**

**Name New Peak Tahoe LLC**

**Address 6030 Seabluff Drive**

**City/State/Zip Playa Vista, CA 90094**

This page provides additional information required by NRS 111.312 Sections 1-2.

To print this document properly, do not use page scaling.

P:\Common\FORMS & Notices\Cover Page Template Oct2017

**RECEIVED**

**APR 10 2024**

**FILED**

1 CASE NO.: 2023-CV-0035

2 DEPT. NO. II

Douglas County  
District Court Clerk

2024 APR 10 PM 4:20

3 This document does not contain  
4 personal information of any person.

BOBBIE R. WILLIAMS  
CLERK

BY *[Signature]* DEPUTY

6 **IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
7 **IN AND FOR THE COUNTY OF DOUGLAS**

8 SMC CONSTRUCTION CO., a Nevada  
9 corporation,

Plaintiff,

11 vs.

12 PEAK TAHOE LLC, a Nevada limited liability  
13 company; and DOES 1-5,

Defendants.

**NOTICE OF FULL RELEASE OF  
LIS PENDENS**

15 SMC CONSTRUCTION CO., a Nevada  
16 Corporation,

Plaintiff,

18 vs.

19 PEAK TAHOE LLC, a Nevada Limited  
20 Liability Company; and DOES 1-5,

Defendants.

21 RICHARD JOSEPH CONSTRUCTION, INC.,  
22 a Nevada Corporation,

Intervenor- Plaintiff

24 vs.

25 PEAK TAHOE LLC, a Nevada Limited  
26 Liability Company; SMC CONSTRUCTION  
27 CO., a Nevada Corporation, and ROES 1-10

Intervenor- Defendants  
28 \_\_\_\_\_ /

1 SMC CONSTRUCTION CO., a Nevada  
2 Corporation,

Plaintiff,

3 vs.

4 PEAK TAHOE LLC, a Nevada Limited  
5 Liability Company; and DOES 1-5,

6 Defendants.

7 MT. ROSE HEATING AND AIR  
8 CONDITIONING, INC., a Nevada  
9 Corporation,

Intervenor- Plaintiff

10 vs.

11 PEAK TAHOE LLC, a Nevada Limited  
12 Liability Company; SMC CONSTRUCTION  
13 CO., a Nevada Corporation, and ROES 1-10

Intervenor- Defendants

14 \_\_\_\_\_ /

15 **NOTICE IS HEREBY GIVEN** that Plaintiff SMC CONSTRUCTION CO., a Nevada  
16 corporation, hereby provides a full release of the *Notice of Pendency of Action (Lis Pendens)*, which  
17 was filed herein and recorded on February 23, 2023 as DOC #2023-994200, attached hereto as  
18 **Exhibit "1."**

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1 It is the intent of Plaintiff SMC CONSTRUCTION CO. that any real property that was  
2 identified in the *Notice of Pendency of Action (Lis Pendens)*, referenced herein, be released in its  
3 entirety.

4 **AFFIRMATION**

5 The undersigned does hereby affirm that the preceding document, **NOTICE OF LIS**  
6 **PENDENS** filed in the Ninth Judicial District Court of the State of Nevada, County of Douglas, does  
7 not contain the social security number of any person.

8 DATED this 10 day of April, 2024.

9 GUNDERSON LAW FIRM

10  
11 By: *Catherine A. Reichenberg*  
12 Catherine A. Reichenberg, Esq.  
13 Nevada State Bar No. 10362  
14 3895 Warren Way  
15 Reno, Nevada 89509  
16 Telephone: 775.829.1222  
17 Email: creichenberg@gundersonlaw.com  
18 *Attorney for SMC Construction Co.*

**CERTIFICATE OF SERVICE**

Pursuant to NRC 5(b), I certify that I am an employee of the law office of Gunderson Law Firm, and that on the 10<sup>th</sup> day of April, 2024, I deposited for mailing in Reno, Nevada a true and correct copy of the **NOTICE OF FULL RELEASE OF LIS PENDENS** addressed to:

John D. Tennert III, Esq.  
MaryJo E. Smart, Esq.  
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Reno, Nevada 89511  
*jtennert@fennemorelaw.com*  
*msmart@fennemorelaw.com*  
*Attorneys for Peak Tahoe LLC*

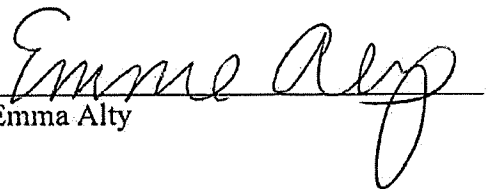
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*Attorneys for Richard Joseph Construction, Inc. & Mt. Rose Heating and Air Conditioning, Inc.*

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*Steven.abbott@lewisbrisbois.com*  
*Attorneys for Sierra Single Ply*

  
Emma Alty

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## EXHIBIT LIST

| Exhibit #   | Description                  | Pages |
|-------------|------------------------------|-------|
| Exhibit "1" | Notice of Pendency of Action | 4     |

**Exhibit "1"**

**COPY**

**Exhibit "1"**

Assessor's Parcel Numbers:

|                 |                 |                 |
|-----------------|-----------------|-----------------|
| 1319-30-544-000 | 1319-30-544-019 | 1319-30-544-037 |
| 1319-30-544-001 | 1319-30-544-020 | 1319-30-544-038 |
| 1319-30-544-002 | 1319-30-544-021 | 1319-30-544-039 |
| 1319-30-544-003 | 1319-30-544-022 | 1319-30-544-040 |
| 1319-30-544-004 | 1319-30-544-023 | 1319-30-544-041 |
| 1319-30-544-005 | 1319-30-544-024 | 1319-30-544-042 |
| 1319-30-544-006 | 1319-30-544-025 | 1319-30-544-043 |
| 1319-30-544-007 | 1319-30-544-026 | 1319-30-544-044 |
| 1319-30-544-008 | 1319-30-544-027 | 1319-30-544-045 |
| 1319-30-544-009 | 1319-30-544-028 | 1319-30-544-046 |
| 1319-30-544-010 | 1319-30-544-029 | 1319-30-544-047 |
| 1319-30-544-011 | 1319-30-544-030 | 1319-30-544-048 |
| 1319-30-544-012 | 1319-30-544-031 | 1319-30-544-049 |
| 1319-30-544-013 | 1319-30-544-032 | 1319-30-544-050 |
| 1319-30-544-014 | 1319-30-544-033 | 1319-30-544-051 |
| 1319-30-544-015 | 1319-30-544-034 | 1319-30-544-052 |
| 1319-30-544-016 | 1319-30-544-035 | 1319-30-544-053 |
| 1319-30-544-017 | 1319-30-544-036 | 1319-30-544-054 |
| 1319-30-544-018 |                 |                 |



SHAWNYNE GARREN, RECORDER

Recording Requested By/Return to:

SMC Construction Co.  
1086 Greg Street  
Sparks, NV 89431

LIS PENDENS

The undersigned does hereby affirm that this document, including the attached Lis Pendens, hereby submitted for recording does not contain the personal information of any person or persons. (Per NRS 239B.030)

DATED this 23rd day of February, 2023.

  
\_\_\_\_\_  
SCOTT L. HERNANDEZ  
*Attorney for Plaintiff SMC Construction Co.*



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Case No.: 2023-CV-00035  
Dept. No.: II **RECEIVED**  
**FEB 23 2023**  
Douglas County  
District Court Clerk

**FILED**  
2023 FEB 23 AM 10:59  
CLODIE H. WILLIAMS  
CLERK  
R. SHOEMAKER  
BY \_\_\_\_\_ DEPUTY

**IN THE NINTH JUDICIAL DISTRICT FOR THE STATE OF NEVADA**  
**IN AND FOR THE COUNTY OF DOUGLAS**

SMC CONSTRUCTION CO., a Nevada corporation,

Plaintiff,

vs.

PEAK TAHOE LLC, a Nevada limited liability company; and DOES 1-5,

Defendants.

**LIS PENDENS**

NOTICE IS HEREBY GIBEN that the above-entitled action concerning and affecting real property as described herein was commenced in the above-entitled court by Plaintiff SMC CONSTRUCTION CO. against Defendants PEAK TAHOE LLC and DOES 1-5, inclusive; the action is now pending in the above-named Court. The action concerns the real property situation in Douglas County, Nevada described as The Peak, 322 Tramway Drive, Stateline Nevada 89449, encompassing

the following Assessor's Parcel Numbers:

|                 |                 |                 |                 |                 |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| 1319-30-544-000 | 1319-30-544-011 | 1319-30-544-022 | 1319-30-544-033 | 1319-30-544-044 |
| 1319-30-544-001 | 1319-30-544-012 | 1319-30-544-023 | 1319-30-544-034 | 1319-30-544-045 |
| 1319-30-544-002 | 1319-30-544-013 | 1319-30-544-024 | 1319-30-544-035 | 1319-30-544-046 |
| 1319-30-544-003 | 1319-30-544-014 | 1319-30-544-025 | 1319-30-544-036 | 1319-30-544-047 |
| 1319-30-544-004 | 1319-30-544-015 | 1319-30-544-026 | 1319-30-544-037 | 1319-30-544-048 |
| 1319-30-544-005 | 1319-30-544-016 | 1319-30-544-027 | 1319-30-544-038 | 1319-30-544-049 |
| 1319-30-544-006 | 1319-30-544-017 | 1319-30-544-028 | 1319-30-544-039 | 1319-30-544-050 |
| 1319-30-544-007 | 1319-30-544-018 | 1319-30-544-029 | 1319-30-544-040 | 1319-30-544-051 |
| 1319-30-544-008 | 1319-30-544-019 | 1319-30-544-030 | 1319-30-544-041 | 1319-30-544-052 |
| 1319-30-544-009 | 1319-30-544-020 | 1319-30-544-031 | 1319-30-544-042 | 1319-30-544-053 |
| 1319-30-544-010 | 1319-30-544-021 | 1319-30-544-032 | 1319-30-544-043 | 1319-30-544-054 |


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The object of Plaintiff's Complaint is to foreclose and enforce certain Mechanics' Liens on and against the properties described herein as The Peak, 322 Tramway Drive, Stateline Nevada 89449, Assessor's Parcel Numbers 1319-30-544-000 through 1319-30-544-054, inclusive, which lien is evidences and secured by a duly recorded, verified claim of lien, recorded in the official records of the Douglas County Recorder, Document Number 2023-993865.

**AFFIRMATION**  
**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 23rd day of February, 2023.



---

SCOTT L. HERNANDEZ  
Nevada Bar No. 13147  
1086 Greg Street  
Sparks, Nevada 89431  
*Attorney for Plaintiff SMC Construction Co.*

CERTIFICATE OF SERVICE

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Pursuant to NRCPC 5(b), I certify that I caused a true copy of the LIS PENDENS to be served on all parties to this action by:

\_\_\_\_\_ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada, addressed to:

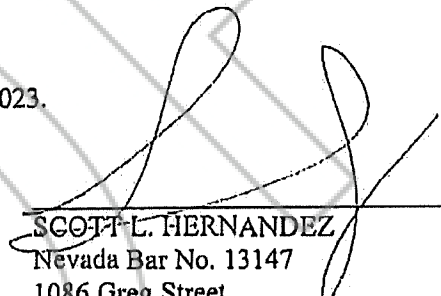
X personal delivery/hand delivery to:

Peak Tahoe LLC  
c/o Business Filings Incorporated  
701 South Carson Street  
Suite 200  
Carson City, Nevada 89701

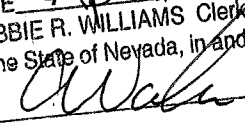
\_\_\_\_\_ emailing an attached Adobe Acrobat PDF version of the document to the email addresses below/facsimile (fax) and/or E-Filing pursuant to Section IV of the District of Nevada Electronic Filing Procedures

\_\_\_\_\_ Federal Express/UPS or other overnight delivery

Dated this 23rd day of February, 2023.

  
\_\_\_\_\_  
SCOTT L. HERNANDEZ  
Nevada Bar No. 13147  
1086 Greg Street  
Sparks, Nevada 89431  
*Attorney for Plaintiff SMC Construction Co.*

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

DATE April 11, 2024  
BOBBIE R. WILLIAMS Clerk of Court  
of the State of Nevada, in and for the County of Douglas,  
By  Deputy