

APN# N/A

DOUGLAS COUNTY, NV **2024-1012014**  
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\$40.00 Pgs=6 **09/10/2024 11:24 AM**  
WADDELL SERAFINO GEARY RECHNER JENEVEIN,  
SHAWNYNE GARREN, RECORDER

**Recording Requested by/Mail to:**

Name: Waddell Serafino Geary Rechner Jenevein, P.C.

Address: 4000 S. Eastern Ave., Ste. 340

City/State/Zip: Las Vegas NV 89119

**Mail Tax Statements to:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Declaration of Plaintiff for 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)

Stacey Werner

Signature

Stacey Werner

Printed Name

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

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Douglas County  
District Court Clerk

RECORDS  
S. FRANZ DEPUTY

1 **WADDELL SERAFINO GEARY**  
2 **RECHNER JENEVEIN, P.C**  
3 Joseph A. Geller, Esq., NV Bar 12378  
4 4000 South Eastern Ave., Suite 340  
5 Las Vegas, Nevada 89119  
6 Tel: (844) 670-2151  
7 NV@wslawpc.com  
8 Attorneys for Plaintiff

**NINTH JUDICIAL DISTRICT COURT  
DOUGLAS COUNTY, NEVADA**

9 WELLS FARGO BANK, NA.,  
10 Plaintiff,

CASE NO. 18-CV-0132  
DEPT. NO. II

11 vs.  
12 FELICYDAD VANMERLIN, an  
13 Individual,  
14 Defendant(s)

**DECLARATION OF PLAINTIFF FOR  
RENEWAL OF JUDGEMENT**

15 COMES NOW, Plaintiff, Wells Fargo Bank, NA., by and through their attorney of  
16 record, Joseph A. Geller, Esq., of Waddell Serafino Geary Rechner Jenevein, P.C and pursuant  
17 to N.R.S. 17.214(1) respectfully represents as follows:

- 18 1. The Declarant is counsel for Plaintiff, Wells Fargo Bank, NA. (herein after referred to  
19 as "Plaintiff"), in the forgoing action, and that Declarant has personal knowledge of the  
20 facts and circumstances surrounding the forgoing action and the following declaration.
- 21 2. That the Parties to this action were, and still are, Plaintiff and FELICYDAD  
22 VANMERLIN herein after referred to as "Defendant(s)").
- 23 3. On or about November 15, 2018, the Judgment against the Defendant(s) was entered in  
24 the sum of \$19,232.48, with costs of \$420.00 and awarded attorney's fees of \$775.00,  
25 totaling a judgment balance of \$20,427.48 (See copy of the Judgment attached hereto  
26 and incorporated herein as Exhibit 1).
- 27 4. Payments and/or Credits have been applied to the judgment balance in the sum of \$0.00.
- 28 5. There are no setoffs or counterclaims in favor of the judgment debtor.
6. That the said Judgment has not been fully satisfied by the date of this declaration.

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7. The total judgment as of August 29, 2024 is \$20,427.48, inclusive of all costs and fees, and Plaintiff hereby renews this judgment for that amount pursuant to statute.

8. That on or about January 7, 2019, the Judgment was recorded in DOUGLAS County, in Book/Instrument Number 2019-924315.

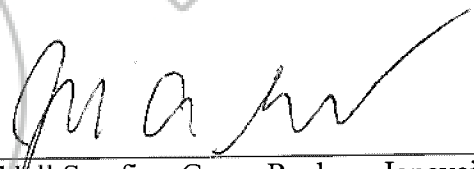
9. There is currently no outstanding Writ of Execution for enforcement of this judgment.

10. The judgment has not been docketed by the clerk of the court upon a certified copy from any other court.

11. This Judgment has not been previously renewed.

I, Joseph A. Geller, Esq., pursuant to NRS 53.045 declare under penalty of perjury that the foregoing is true and correct, and being duly sworn, states: that Declarant is the attorney for the Plaintiff and has personal knowledge of the above; that the items contained in the above declaration are true and correct to the best of this Declarant's knowledge and belief. Further, pursuant to NRS 239B.030. The undersigned affirms that the foregoing document does not contain a social security number.

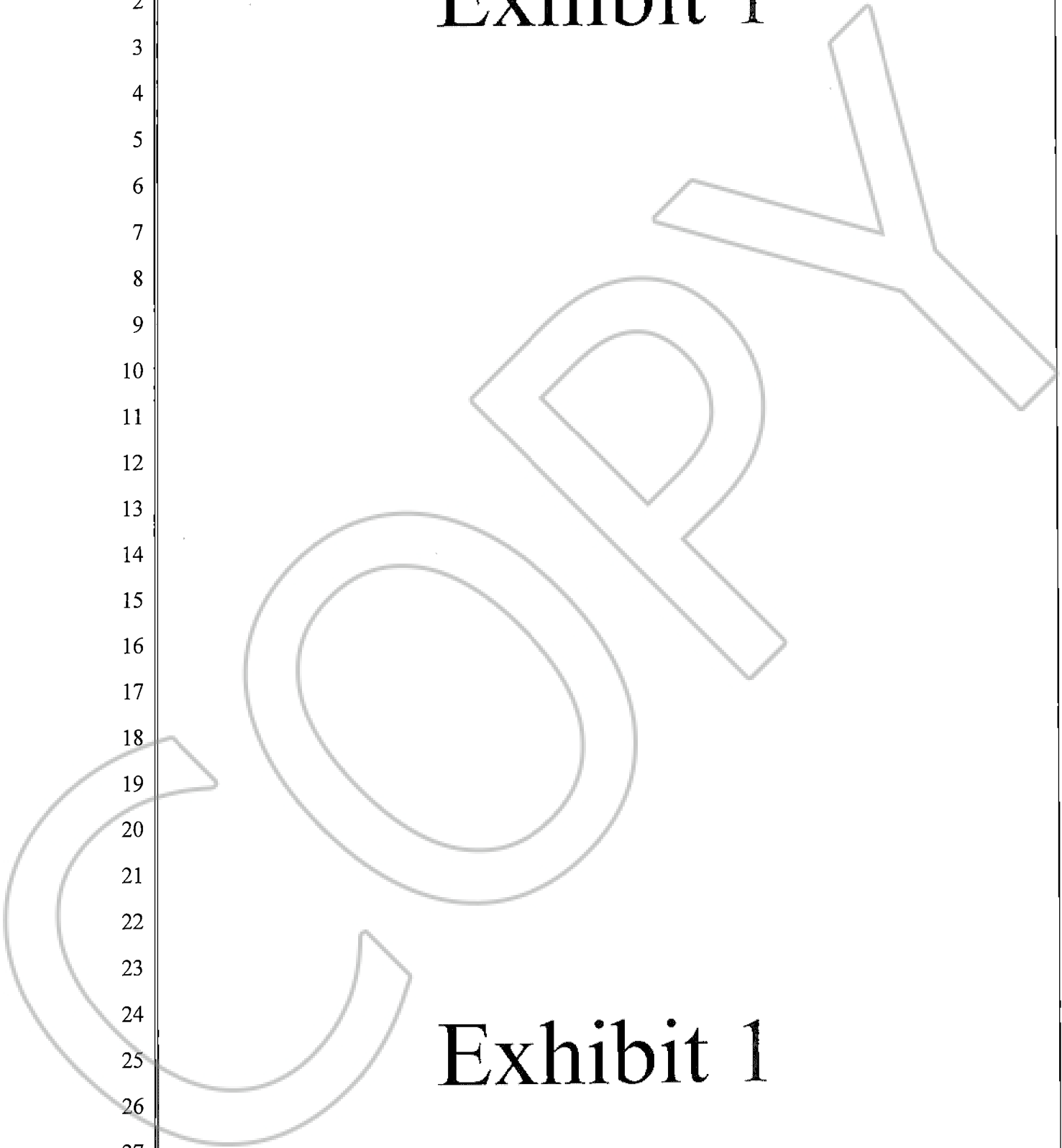
DATED this 29 day of August 2024.

  
Waddell Serafino Geary Rechner Jenevein, P.C.  
Joseph A. Geller, Esq.,  
NV Bar 12378  
4000 South Eastern Ave., Suite 340  
Las Vegas, Nevada 89119  
Tel: (702)331-8470  
Attorney for Plaintiff

# Exhibit 1

# Exhibit 1

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DFJD  
QUALEY LAW GROUP  
Robert S. Qualey, Esq.  
Nevada Bar Number 003570  
Cybill L. Dotson, Esq.  
Nevada Bar Number 008428  
2320 Paseo Del Prado, Ste. B-205  
Las Vegas, Nevada 89102  
(702) 474-6677  
nevadacollections@qualeyfirm.com  
Attorneys for Plaintiff

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Douglas County  
District Court Clerk

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2018 NOV 15 AM 8:50

BERNIE R. WILLIAMS  
BY A. NEWTON  
DEPUTY

IN THE NINTH JUDICIAL DISTRICT COURT  
DOUGLAS COUNTY, NEVADA

\*\*\*\*\*

WELLS FARGO BANK, N.A.,  
Plaintiff,

Case No: 18-CV-0132  
Dept. No: II

vs.

DEFAULT JUDGMENT

FELICYDAD VANMERLIN, an individual,  
Defendant(s).

FELICYDAD VANMERLIN, Defendant(s) 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(s) having been duly entered according to law, Default Judgment is hereby entered against Defendant(s) pursuant to the prayer of said Complaint:

QUALEY LAW GROUP  
ATTORNEYS AT LAW  
2320 PASEO DEL PRADO, STE. B-205  
LAS VEGAS, NEVADA 89102  
TELEPHONE (702) 474-6677 FACSIMILE (702) 474-6678



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

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff shall have and recover from Defendant(s), FELICYDAD VANMERLIN, the sum of \$19,232.48, plus Plaintiff's costs and disbursements incurred in the sum of \$420.00, plus attorney's fees in the sum of \$775.00.

DATED November 14, 2018

*[Signature]*  
DISTRICT COURT JUDGE

Affirmation pursuant to NRS 239B.030.

The undersigned affirms that the foregoing document does not contain a social security number.

QUALLEY LAW GROUP  
ATTORNEYS AT LAW  
230 PASEO DEL PRADO, SUITE 205  
LAS VEGAS, NEVADA 89102  
TELEPHONE (702) 474-4877 FACSIMILE (702) 474-4878

Submitted by:  
QUALLEY LAW GROUP

By: *[Signature]*  
Robert S. Qualey, Esq.  
Nevada Bar Number 003570  
Cybill L. Dotson, Esq.  
Nevada Bar Number 008428  
2320 Paseo Del Prado, Ste. B-205  
Las Vegas, Nevada 89102  
nevadacollections@qualeyfirm.com  
Attorneys for Plaintiff

Date: 12/31/18

Case No. 18-CV-0132  
160107

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 September 5, 2024  
REBECCA EDWARDS, Clerk of Court  
of the State of Nevada, in and for the County of Douglas,  
By *[Signature]* Deputy