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No. 14660

Dept. No.

YVONNE BERNARD  
CLERKBY Deputy DEPUTY

IN THE NINTH JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA, IN AND FOR THE COUNTY OF MINDEN

RICHARD SEELEY,

Plaintiff,

FOREIGN JUDGMENT

vs.

BRUCE A. SEYMOUR, et. al.,

Defendant.

Attached hereto and incorporated by reference as if  
set forth in full is a Judgment and Affidavit entered in the  
Superior Court of the State of California, County of San  
Francisco, against BRUCE A. SEYMOUR.

FRY, FRY, &amp; IHARA, ESQS.,

By Craig I. Ihara  
Craig I. Ihara, ESQ.  
195 Casazza Drive  
Reno, NV 89502  
Attorney for Plaintiff

FRY, FRY AND IHARA  
ATTORNEYS AND COUNSELORS AT LAW  
195 CASAZZA DRIVE  
POST OFFICE BOX 2758  
RENO, NEVADA 89502  
702-328-8848

HW  
84-1923

## CERTIFIED COPY

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.

SEAL  
affixed

DATE May 21, 1984  
Yvonne Bernard Clerk of the Ninth Judicial District Court  
of the State of Nevada, in and for the County of Douglas.

By Deputy Deputy

AFFIDAVIT IN SUPPORT OF ENTRY OF SISTER STATE JUDGMENT

1 STATE OF CALIFORNIA )  
2 ) ss  
3 CITY AND COUNTY OF SAN FRANCISCO )

4 Jay Chafetz, being first duly sworn says:

5 1. The attached Exhibit A is a true and correct  
6 copy of the judgment ("the sister state judgment") rendered  
7 in favor of Richard Seeley and against Bruce A. Seymour in  
8 the actions filed in the Superior Court of the State of California  
9 for the City and County of San Francisco titled and numbered as  
10 follows: Richard Seeley v. Bruce A. Seymour, et al.,  
11 No. 778-831 and Richard Seeley v. City and County of San  
12 Francisco, et al. No. 788-104.

13 2. An action in Nevada on the sister state judgment  
14 is not barred by the applicable statute of limitations.

15 3. No stay of enforcement of the sister state  
16 judgment is currently in effect in California.

17 4. The amount remaining unpaid under the sister  
18 state judgment is \$2,860,000.00. Interest accrues on this  
19 judgment at the rate of 10% per annum in accordance with  
20 California Code of Civil Procedure §685.010.

21 5. No action based on the sister state judgment is  
22 currently pending in any court of the State of Nevada and no  
23 judgment based on the sister state judgment has previously  
24 been entered in any proceeding in Nevada.

25 6. The name and last known residence address of  
26 the judgment debtor are as follows: Bruce A. Seymour, 15 Edward  
27 Court, San Rafael, California 94901. The judgment debtor has  
28 also disclosed the address of P. O. Box 1781, Zephyr Cove,  
29 Nevada, 89948.

30 7. Name and address of the judgment creditor are  
31 as follows: Richard Seeley, c/o Cooper, White & Cooper,  
32 101 California Street, Sixteenth Floor, San Francisco,

COOPER, WHITE  
& COOPER  
ATTORNEYS AT LAW  
101 CALIFORNIA STREET  
SAN FRANCISCO 94111

1 California, 94111.

2

3 DATED: March 8, 1984

4

5

6

7 Subscribed and sworn to

8 before me on March

9 8th, 1984.

10

11 Hilary Allen

12 Notary Public

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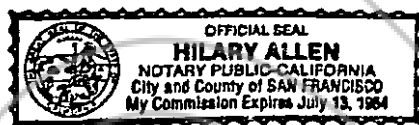
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# In the Superior Court of the State of California

IN AND FOR THE  
CITY AND COUNTY OF SAN FRANCISCO

RICHARD SEELEY,

Plaintiff,

No. 778-831

BRUCE A. SEYMOUR, et al.,

Defendant.

I, DONALD W. DICKINSON, County Clerk of the City and County of San Francisco, and Ex-Officio Clerk of the Superior Court of the State of California, in and for the City and County of San Francisco, do hereby certify the foregoing to be a full, true and correct copy of the original Amended Judgment.

on file and of record in my office in the above entitled cause. That the same constitutes a full and complete exemplification of the above-described document.

in the said cause, and of the whole thereof.

All of which I have caused to be exemplified according to the Act of Congress.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the

seal of said Court, this 7th day

of March, A. D. 1984.

County Clerk and Ex-Officio Clerk of the Superior Court

I, JOHN A. ERTOLA, Presiding Judge of the Superior Court of the State of California, in and for the City and County of San Francisco, do hereby certify that said Court is a Court of Record having a Clerk and Seal. That DONALD W. DICKINSON, who has signed the annexed attestation, is the duly appointed and qualified County Clerk of the City and County of San Francisco, and was at the time of signing said attestation, Ex-Officio Clerk of said Superior Court. That said signature is his genuine handwriting, and that all his official acts, as such Clerk, are entitled to full faith and credit.

And I further certify that said attestation is in due form of law.

Witness my hand this 7th day of March, A. D. 1984.

JOHN A. ERTOLA

Presiding Judge of said Superior Court

STATE OF CALIFORNIA, } ss.  
City and County of San Francisco.

I, DONALD W. DICKINSON, County Clerk of the City and County of San Francisco, and Ex-Officio Clerk of the Superior Court of the State of California, in and for the City and County of San Francisco, do hereby certify that

the Honorable JOHN A. ERTOLA, whose name is subscribed to the preceding Certificate, is Presiding Judge of the Superior Court of the State of California, in and for the City and County of San Francisco, duly elected and qualified, and that the signature of said Judge to said Certificate is genuine.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the

seal of said Court, this 7th day

of March, A. D. 1984.

County Clerk and Ex-Officio Clerk of the Superior Court

MICROPHOTOCOPIED

**FILED**  
San Francisco County Superior Court

FEB 08 1984

DONALD W. DICKINSON, Clerk

BY *[Signature]*  
Deputy Clerk

1 GEORGE AGNOST  
2 City Attorney  
3 PHYLLIS WALKER  
4 Deputy City Attorney  
5 206 City Hall  
6 San Francisco, CA 94102  
7 Telephone: (415) 558-5505  
8  
9 Attorneys for Defendant and  
10 Cross-Complainant City and County  
11 of San Francisco and Thomas Kearney  
12  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE CITY AND COUNTY OF SAN FRANCISCO

11 RICHARD SEELEY, ) No. 778-831;  
12 )  
13 Plaintiff, )  
14 )  
15 vs. )  
16 )  
17 BRUCE A. SEYMOUR, et al., )  
18 )  
19 Defendants. )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )

17 AND RELATED CROSS ACTIONS )  
18 )  
19 RICHARD SEELEY, ) No. 788-104  
20 )  
21 Plaintiff, )  
22 )  
23 vs. )  
24 )  
25 CITY AND COUNTY OF SAN )  
26 FRANCISCO, et al., )  
Defendants. )  
AND RELATED CROSS ACTIONS )  
AMENDED JUDGMENT

GEORGE AGNOST  
CITY ATTORNEY  
ROOM 206 CITY HALL  
SAN FRANCISCO 94102  
558-2318



1 This judgment constitutes an amendment of the judgment  
2 signed by the Honorable John Dearman on Feb 7, 1984.

3 These causes came on regularly for trial on January 11, 1984,  
4 in Department 20 of the above-entitled Court, the Honorable John  
5 Dearman, Judge, presiding. Plaintiff appeared by his attorney  
6 John Mahoney, defendant and cross-complainant Bruce A. Seymour  
7 appeared by his attorney Dan W. Lacy, defendant Safeco Title  
8 Insurance Co. appeared by its attorney John B. Dickson, and  
9 defendants City and County of San Francisco and Thomas Kearney  
10 appeared by City Attorney George Agnost, through Deputy City  
11 Attorney Phyllis Walker.

12 A jury of twelve persons was regularly impaneled and sworn  
13 to try the actions. Witnesses on the part of plaintiff and all  
14 defendants were sworn and examined. After hearing the evidence,  
15 the arguments of counsel, and instructions of the Court, the jury  
16 retired to consider its verdict and subsequently returned to Court;  
17 being called, the jurors answered to their names and duly rendered  
18 their verdict in writing, in words and figures as follows:

19 We, the jury in the above-entitled actions, find for the  
20 plaintiff and against the defendants and assess damages as follows:

21	Compensatory Damages	<u>\$200,000.00</u>
22	Punitive Damages (against defendant	
23	Seymour only)	<u>\$2,660,000.00</u>

24 Dated: February 3, 1984

25 S/

CAROL BURGOA  
Foreman

26  
GEORGE AGNOST  
CITY ATTORNEY  
ROOM 808 CITY HALL  
SAN FRANCISCO 94102  
800-3318

1 WHEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED that plaintiff  
2 Richard Seeley have and recover from defendants Burce A. Seymour,  
3 Safeco Title Insurance Co. and City and County of San Francisco  
4 and Thomas Kearney the sum of \$200,000.00, said defendants being  
5 jointly and severally liable therefor, with interest thereon at  
6 the rate of ten percent per annum from the date of the verdict  
7 until paid, together with costs and disbursements amounting to  
8 the sum of \$\_\_\_\_\_.

9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that plaintiff  
10 Richard Seeley recover from defendant Bruce A. Seymour the  
11 additional sum of \$2,660,000.00 in punitive damages, with interest  
12 thereon at the rate of ten percent per annum from the date of the  
13 verdict until paid.

14 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that defendant  
15 and cross-complainant Bruce A. Seymour take nothing by his cross-  
16 complaint against plaintiff and cross-defendant Richard Seeley,  
17 and that plaintiff and cross-defendant Richard Seeley have and  
18 recover from defendant and cross-complainant Bruce A. Seymour  
19 costs and disbursements amounting to the sum of \$\_\_\_\_\_.

20 The defendants having stipulated that the Court should decide  
21 the issues of indemnity and apportionment, in lieu of judgment  
22 upon a jury verdict on those issues, IT IS HEREBY FURTHER ORDERED,  
23 ADJUDGED, AND DECREED that:

24 ///

25 ///

26 ///

GEORGE AGNOST  
CITY ATTORNEY  
ROOM 306 CITY HALL  
SAN FRANCISCO 94102  
339-3216

1 1.) The liability of the three defendants on the complaint  
2 is apportioned as follows:

3 Defendant Bruce A. Seymour:	92%
4 Defendant Safeco Title Insurance Co.:	5%
5 Defendants City and County of San 6 Francisco and Thomas Kearney:	3%

7  
8 2.) Cross-complainant Safeco Title Insurance Co. is  
9 entitled to full indemnity, 100% against cross-  
10 defendant Bruce A. Seymour for any amounts it may  
11 be required to pay to plaintiff, together with its  
12 costs and disbursements.

13  
14 3.) Cross-complainants City and County of San Francisco  
15 and Thomas Kearney are entitled to full indemnity, 100%  
16 against cross-defendant Bruce A. Seymour for any amounts  
17 they may be required to pay to plaintiff, together with  
18 their costs and disbursements.

19  
20 4.) Cross-complainant Safeco Title Insurance Co. is not  
21 entitled to any indemnity against cross-defendants  
22 City and County of San Francisco and Thomas Kearney.

23  
24 5.) Cross-complainants City and County of San Francisco  
25 and Thomas Kearney are entitled to partial indemnity  
26 against cross-defendant Safeco Title Insurance Co. in

-4-

GEORGE AGNOST  
CITY ATTORNEY  
ROOM 208 CITY HALL  
SAN FRANCISCO 94102  
333-2319



1 the amount of sixty-two and one half percent  
2 (62 1/2%) of any amount the City and County of  
3 San Francisco and Thomas Kearney actually pay  
4 to plaintiff Richard Seeley.

5  
6 WITNESS, the Honorable John Dearman, Judge of this Court,  
7 and my hand and seal of this Court, this 8th day of February,  
8 1984.

9  
10   
11 JUDGE OF THE SUPERIOR COURT

12 DONALD W. DICKINSON, County Clerk

13  
14 By H. E. SULLINGER III  
15 Deputy Clerk  
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GEORGE AGNOST  
CITY ATTORNEY  
ROOM 306 CITY HALL  
SAN FRANCISCO 94102  
350-3519

I, SUE SHIMOSAKA, say:

I am a citizen of the United States, over eighteen years of age, and not a party to the within action; that my business address is 206 City Hall, 400 Van Ness Avenue, San Francisco, California 94102.

That on February 8, 1984 I served

AMENDED-JUDGMENT

by placing a true copy thereof in an envelope addressed to:

COOPER, WHITE & COOPER  
JOHN MAHONEY  
BEVERLY BREWSTER  
101 California Street, 16th Floor  
San Francisco, CA 94111

ADAMS, KOUBA & DICKSON  
JOHN B. DICKSON  
660 Market Street, Suite 300  
San Francisco, CA 94104

DAN W. LACY, ESQ.  
P.O. BOX 951  
400 W. Miner Street  
Yreka, CA 96097

and by then sealing and depositing said envelope, with postage thereon fully prepaid, in the United States Mail at San Francisco, California. That there is delivery service by the United States Mail at the place so addressed or regular communication by United States Mail between the place of mailing and the place so addressed.

I declare (or certify) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

February 8, 1984  
Date

*Sue Shimosa*  
SUE SHIMOSAKA

DECLARATION OF SERVICE BY MAIL

RECORDED AT REQUEST OF  
Fry, Fry and Ihara  
BOOK 123 PAGE 41

84 MAY 25 AIO: 57

OFFICIAL RECORDS  
EURERA COUNTY, NEVADA  
M.N. REBALEATI, RECORDER  
FILE NO: 93434  
FEE \$ 14.00

BOOK 123 PAGE 050