

Alan K. Chamberlain

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Official Record

Recording requested By
GERRARD, COX, LARSEN

Eureka County - NV

Sara Simmons - Recorder

Fee: \$16.00

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RPTT:

Recorded By: LH

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0229047

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

ALAN K. CHAMBERLAIN, an individual;
CHAMBERLAIN EXPLORATION,
DEVELOPMENT AND RESEARCH
STRATIGRAPHIC CORPORATION, D/B/A
CEDAR STRAT, a Nevada Corporation,

Plaintiff,

vs.

RICHARD D. FRITZLER, SR., an individual;
DANIEL L. EARL, an individual; MONT BLANC
TECHNOLOGIES, INC., is a Nevada corporation;
TROPICAL VIBE, INC., is a Nevada corporation;
OLD BANDIE CORPORATION, is a Nevada
corporation; OUTLAND STUDIES, INC., is a
Nevada corporation; DOES I through X, inclusive;
and ROE BUSINESS ENTITIES I through X,
inclusive,

Defendants.

Case No. A-14-708249-C

Dept. No. Dept. XXVII

NOTICE OF LIS PENDENS

(300 Nob Hill Ave, Eureka County, Nevada)

NOTICE IS HEREBY GIVEN that an action has been commenced in the Eighth Judicial District Court in and for Clark County, Nevada by Plaintiffs ALAN K. CHAMBERLAIN and CHAMBERLAIN EXPLORATION, DEVELOPMENT AND RESEARCH STRATIGRAPHIC CORPORATION, D/B/A CEDAR STRAT, against the above-named Defendants, each of which claim or may claim an interest in and to the property involved in this lawsuit.

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ALAN K. CHAMBERLAIN and
CHAMBERLAIN EXPLORATION, DEVELOPMENT
AND RESEARCH STRATIGRAPHIC
CORPORATION, D/B/A CEDAR STRAT

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The Plaintiffs are seeking, *inter alia*, to quiet title to certain real property located at 300 Nob Hill Ave, Eureka, Eureka County, Nevada, 89316 commonly known as Assessor's Parcel No. (APN) 001-031-07 (the "Property") with a legal property description bounded and described as set forth:

PARCEL 1:

All of Lot 1 in Block 78 and that portion of the old railroad grade commencing at the Southeast corner of Lot 2, Block 78, thence 130.86 feet North 31°03' East along the east end of Lot 2, Lot 3, Lot 4 and 2.21 feet of Lot 5, thence 38.8 feet South 9°09' East to the North corner of Lot 1, Block 78, thence 82.33 feet South 31°03' West to the Southwest corner of Lot 1, Block 78, thence 32.8 feet South 80°51' West to the Southeast corner of Lot 2, Block 78, the place of beginning of the Town of Eureka, Nevada, according to the Official map thereof, filed in the office of the County Recorder, Eureka county, State of Nevada.

PARCEL 2:

Lots 2, 3 and 4 in Block 78, of the Town of Eureka, Nevada, according to the Official map thereof, filed in the office of the County Recorder, Eureka County, State of Nevada.

EXCEPTING FROM parcels 1 and 2 all uranium, thorium, or any other materials which is or may be determined to be peculiarly essential to the production of fissionable materials, whether or not of commercial value reserved by the United States of America, by Patent recorded December 19, 1947, in Book 23, Page 226, Deed Records, Eureka County, Nevada.

The Plaintiffs seek to Quiet Title, and a declaratory judgment that they are the owners of the Property and that the Defendants have no right, title, or interest in the Property. Plaintiffs also bring claims against the Defendants for Breach of Contract; Breach of Implied Covenant of Good Faith and Fair Dealing; Quasi-Contract and/or Unjust Enrichment; Civil Conspiracy; Fraud / Intentional Misrepresentation; Accounting; Constructive Trust; Conversion; and RICO Civil Action Pursuant to 18 U.S.C. §§ 1962 et seq. Any purchase of the Property will be subject to the above-identified litigation, as set forth more fully in this lawsuit.

Dated this 8th day of January, 2015.

GERRARD COX & LARSEN

/s/ John M. Langeveld
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Attorneys for Plaintiffs, ALAN K. CHAMBERLAIN



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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of GERRARD, COX & LARSEN, and that on the 8th day of January, 2014, I served a true and correct copy of the forgoing **NOTICE OF LIS PENDENS** (300 Nob Hill Ave, Eureka, Eureka County, Nevada 89316), by e-serving a copy on all parties registered and listed as Service Recipients in Wiznet, the Court's on-line, electronic filing website, pursuant to Administrative Order 14-2, entered by the Chief Judge, Jennifer Togliatti, on May 9, 2014, and by depositing a copy in the United States mail, at Las Vegas, Nevada, postage fully prepaid, and addressed as follows:

Donald J. Green, Esq.
LAW OFFICES OF DONALD J. GREEN
4760 South Pecos Road, Suite 103
Las Vegas, NV 89121

/s/ Kanani Gonzales
Kanani Gonzales, an employee of
GERRARD COX LARSEN



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