1 David Mincin, Esq. Nevada Bar No. 5427 2 MINCIN LAW, PLLC 7465 W. Lake Mead Boulevard, #10 3 Las Vegas, Nevada 89128 dmincin@mincinlaw.com 4 Phone: 702-852-1957 Fax: NA 5 Attorney for Jocelyne Abrar and JPA Investments, LLC 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 WELLS FARGO BANK, N.A., a national 9 banking association, Case No.: 2:13-CV-1472-GMN-NJK 10 Plaintiff, 11 VS. 12 ALIREZA KAVEH, an individual; ALIREZA KAVEH, as Trustee of the Alireza Kaveh 13 Family Trust; JPA INVESTMENTS, LLC, a Nevada limited liability company, JOCELYNE 14 ABRAR, an individual; JOCELYNE ABRAR as Trustee of The Jocelyne Abrar Trust; ALI 15 KAVEH aka Alireza Kaveh, Sr., an individual; MOLOUK KAVEH; and MOLOUK KAVEH, 16 as Trustee of The Kaveh Family Trust, 17 Defendants. 18 STIPULATION AND ORDER TO: 19 I) CORRECT CLERICAL ERROR AND AMEND JUDGMENT ENTERED **MARCH 31, 2017**; 20 II) DISMISS SECOND AND THIRD CLAIMS FOR RELIEF 21 Plaintiff, Wells Fargo Bank, N.A., by and through its counsel of record, Michael F. 22 Lynch, Esq., of Lynch Law Practice, PLLC, and Defendants JPA Investments, LLC; Jocelyne 23 Abrar; Jocelyne Abrar as Trustee of The Jocelyne Abrar Trust; Ali Kaveh aka Alireza Kaveh, 24 Sr.; Molouk Kaveh and Molouk Kaveh as Trustee of The Kaveh Familly Trust dated July 31, 25 1998 ("The Kaveh Family Trust"), and Alireza Kaveh, in Proper Person, stipulate and agree as 26 follows. 27 28

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1	WHEREAS the Complaint on file identifies three separate loans held by Plaintiff				
2	Wells Fargo Bank, N.A., against three different Limited Liability Companies and properties				
3	and against different defendants identified therein (Document 1).				
4	WHEREAS the first claim for relief arises from a loan identified as the Craig 95 Loan				
5	(Document 1).				
6	WHEREAS the second claim for relief arises from a loan identified as the Frontier				
7	Loan (Document 1).				
8	WHEREAS the third claim for relief arises from a loan identified as the Alireza Loan				
9	(Document 1).				
0	WHEREAS On April 8, 2016, partial summary judgment was entered against				
.1	Defendants Alireza Kaveh, as an individual; Alireza Kaveh, as Trustee of the Alireza Kaveh				
2	Family Trust; JPA Investments, L.L.C.; Jocelyne Abrar, as an individual; and Jocelyne Abrar				
.3	as Trustee of the Jocelyne Abrar Trust relating to breaches the Craig 95 Loan (Document 69).				
4	WHEREAS Wells Fargo and the same Defendants identified in Document 69 then				
5	proceeded to prosecute a traditional deficiency hearing to determine fair market value on the				
6	date of the foreclosure of the underlying Craig 95 real property.				
.7	WHEREAS on March 31, 2017 at the conclusion of the fair market value deficiency				
8	hearing the Court entered an Order which contained findings of fact and conclusions of law				
9	(Document 107), and WHEREAS a Judgment was entered thereon on the same date				
20	(Document 108).				
21	WHEREAS in entering the Judgment on March 31, 2017 the clerk checked the box				
22	that identifies all "Defendants" rather than just those defendants who were parties to the Craig				
23	95 Loan.				
24	IT IS HEREBY STIPULATED AND AGREED that pursuant to FRCP 60 a mistake				
25	has occurred and to the extent Judgment (Document 108) includes Defendants Alireza Kaveh,				
26	Sr. Molouk Kaveh, and Molouk Kaveh Trust, this was the result of clerical error entitling the				
27	latter defendants to relief.				

1 IT IS HEREBY STIPULATED AND AGREED the Judgment entered March 31, 2 2017 (Document 108) is corrected and clarified to delete and omit any reference to 3 Defendants Alireza Kaveh, Sr. Molouk Kaveh, and Molouk Kaveh Trust and amended to state 4 that it is entered only against Defendants Alireza Kaveh, as an individual; Alireza Kaveh, as 5 Trustee of the Alireza Kaveh Family Trust; JPA Investments, L.L.C.; Jocelyne Abrar, as an individual; and Jocelyne Abrar, as Trustee of the Jocelyne Abrar Trust, jointly and severally. 6 7 IT IS HEREBY FURTHER STIPULATED AND AGREED that the Second Cause 8 of Action stated in the Complaint filed August 16, 2013 arising from the Frontier Loan, Note 9 and Guaranty against Alireza Kaveh, Sr.; Molouk Kaveh and Molouk Kaveh as Trustee of 10 The Kaveh Family Trust dated July 31, 1998 ("The Kaveh Family Trust") shall be and hereby 11 is dismissed without prejudice, in its entirety, the parties to bear their own attorneys fees and 12 costs as it relates to that claim. 13 IT IS HEREBY FURTHER STIPULATED AND AGREED that the Third Cause of Action stated in the Complaint filed August 16, 2013 arising from the Alireza Loan, Note 14 15 and Guaranty shall be and hereby is dismissed without prejudice, in its entirety, the parties to 16 bear their own attorneys fees and costs as it relates to that claim. 17 IT IS HEREBY FURTHER STIPULATED AND AGREED that this Stipulation and Order shall not effect or effectuate a settlement of the First Cause of Action stated in the 18 19 Complaint filed August 16, 2013 arising from the Craig 95 Loan, Note and Guaranty or affect the Judgment as it is entered against Defendants Alireza Kaveh, as an individual; Alireza 20 21 Kaveh, as Trustee of the Alireza Kaveh Family Trust; JPA Investments, L.L.C.; Jocelyne 22 Abrar, as an individual; and Jocelyne Abrar, as Trustee of the Jocelyne Abrar Trust 23 (Document 108). 24 111 25 111 26 27

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1	IT IS HEREBY FURTHER STIPULATED AND AGREED that Frontier			
2	Defendants waive any right under FRCP 41 or otherwise that the dismissal stated herein shall			
3	operate as an adjudication on the merits or as a bar to Plaintiff seeking relief in a newly filed			
4	action relating to the Frontier Loan or the Second Cause of Action.			
5	SO STIPULATED	SO S	SO STIPULATED	
6	DATED this 30 th day of June, 2017.	DATI	DATED this 28 th day of June, 2017.	
7	MINCIN LAW, PLLC	LYNO	LYNCH LAW PRACTICE, PLLC	
891011	By: /s/ David Mincin David Mincin, Esq. State Bar No.5427 7465 W. Lake Mead Bvd., #!00 Las Vegas, Nevada 89128 Attorney For Jocelyne Abrar, Ali Kaveh, Moluck Kaveh and JPA Investments, LLC	Ву:	/s/ Michael F. Lynch Michael F. Lynch, Esq. State Bar No. 8555 3613 S. Eastern Avenue Las Vegas, Nevada 89169 Attorney for Plaintiffs	
12 13				
14				
15 16	DATED this 1 day of May, 20)18. 	Gloria M. Navarro, Chief Judge	
17			United States District Court	
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