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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 TRUSTEES OF THE PLUMBERS AND  
13 PIPEFITTERS UNION LOCAL 525  
14 PENSION PLAN; PLUMBERS AND  
PIPEFITTERS UNION LOCAL 525  
15 PENSION PLAN,

16 Plaintiffs,

17 vs.

18 SOUTHWEST AIR CONDITIONING,  
19 INC., a Nevada corporation,

20 Defendant.

Case No. 2:16-cv-02355-KJD -VCF

**ORDER FOR JUDGMENT DEBTOR  
EXAMINATION OF SOUTHWEST AIR  
CONDITIONING, INC.'S SECRETARY,  
ROCK HALVERSON**

**DATE: December 5, 2017**

**TIME: 11:00 a.m.**

21 The Court having reviewed the Motion for Judgment Debtor Examination of Southwest  
22 Air Conditioning, Inc.'s ("Southwest") Treasurer and President, James Halverson; Secretary,  
23 Rock Halverson; and Director, Gary Halverson, submitted by the Plaintiffs, Trustees of the  
24 Plumbers and Pipefitters Union Local 525 Pension Plan ("Trustees") and the Plumbers and  
25 Pipefitters Union Local 525 Pension Plan (the "Plan") (collectively "Trust") and good cause  
26 appearing:  
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1 IT IS HEREBY ORDERED that the Rock Halverson as Secretary of Southwest shall  
2 appear at the office of Brownstein Hyatt Farber Schreck, LLP, located at 100 North City  
3 Parkway, Suite 1600, Las Vegas, Nevada 89106 on December 5, 2017, at 11:00 a.m. for a  
4 judgment debtor examination before a notary public or some other officer authorized by law to  
5 administer oaths and recorded by stenographic means regarding the following subject matter:

- 6 1. The documents produced in compliance with this Order;
- 7 2. Southwest's assets and liabilities; and
- 8 3. Southwest's financial books and records from 2010 to the present.

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10 IT IS FURTHER ORDERED that Rock Halverson as Secretary of Southwest shall  
11 produce to the Trust's counsel at 100 North City Parkway, Suite 1600, Las Vegas, Nevada 89106,  
12 one (1) week prior to the examination, the following documents:

- 13 1. Any and all documents evidencing the current ownership of Southwest's stock,  
14 including the name and address of such owners;
- 15 2. Any and all documents evidencing the ownership of Southwest, including both  
16 individuals and entities;
- 17 3. Any and all documents evidencing the ownership of any other entities by the  
18 persons identified in the documents referenced in Request No. 2;
- 19 4. Any and all documents regarding real property currently owned by Southwest,  
20 including but not limited to location, value, mortgage, mortgage payments, liens, or the like  
21 regarding such real property;
- 22 5. A complete current inventory list of assets owned by Southwest, including but not  
23 limited to, office equipment, vehicles, and accounts receivable;
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6. The last twelve (12) statements for each and every one of Southwest's bank accounts in existence during such twelve (12) months, without regard to whether such account remains open;

7. Any and all documents regarding real property disposed of by Southwest in the last five (5) years;

8. Copies of all existing contracts under which Southwest is (a) currently performing work, (b) has completed work but is owed payment of any amount, or (c) will commence work in the future; and

9. Any and all documents evidencing for whom Southwest has performed work in the past two (2) years, and all records showing the number of hours worked by Southwest's employees in the past two years, and on what projects all such work was performed.

DATED this 26th day of October, 2017.

  
~~UNITED STATES DISTRICT COURT JUDGE~~  
UNITED STATES MAGISTRATE JUDGE

Submitted by:  
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