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8 Attorneys for Plaintiff Avocado Oil de Mexico, Inc.

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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 AVOCADO OIL DE MEXICO, INC.,

14 Plaintiff,

15 v.

16 ALKO GREEN FRESH LLC, and JORGE A.  
17 ORTEGA MEDINA,

18 Defendants.

**CASE NO.: 2:21—cv-00946-RFB-BNW**

**ORDER FOR JUDGMENT DEBTOR  
EXAMINATION OF ALKO GREEN  
FRESH, LLC**

19 It appearing to the Court, by the Petition of Plaintiff, Avocado Oil De Mexico, Inc., in the above-  
20 entitled matter, that a Stipulated Judgment was recovered in said action against Judgment Debtor, Alko  
21 Green Fresh, LLC, a Nevada limited liability company, on September 15, 2021, in the sum of  
22 \$74,012.00, plus interest accrued at the rate of 18% annually of \$6,298.84 through June 15, 2021, and  
23 accruing thereafter at in the amount of \$36.50 per day, together with attorney's fees and costs in the sum  
24 of \$11,582.73, that one payment of \$3,083.33 was made on the Stipulated Judgment and a writ of  
25 garnishment was returned for \$102.78 and no payments were made thereafter, and that the balance of  
26 said Stipulated Judgment remains wholly unsatisfied, and whereas NRS 21.270 provides for the  
27 examination of judgment debtors under such circumstances:

28 IT IS HEREBY ORDERED that the person most knowledgeable of the Judgment Debtor, Alko  
Green Fresh, LLC's Federal Rule of Civil Procedure 30(b)(6) witness appear on the 22nd day of  
March, 2023, at the hour of 1:30 p.m., at the law office of BLACK & WADHAMS, located at 10777

1 **W. Twain Ave., Suite 300, Las Vegas, Nevada 89135**, or through other electronic means, and on such  
2 further days as I shall name, to make discovery under oath before a notary public, or some other officer  
3 authorized by law to administer oaths, concerning Judgment Debtor Alko Green Fresh, LLC's property,  
4 interests or assets and those items listed on Exhibit 1 hereto.

5 IT IS FURTHER ORDERED that said person most knowledgeable of Judgment Debtor Alko  
6 Green Fresh, LLC bring to said hearing the documents set forth in Exhibit "1" attached hereto and  
7 incorporated herein by this reference.

8 IT IS FURTHER ORDERED that a copy of this Order, together with a copy of the Notice of  
9 Judgment Debtor's Exam, be forthwith served on said Judgment Debtor Alko Green Fresh, LLC or on  
10 their attorney or registered agent of the State of Nevada, in the manner provided by law for service of  
11 Summons.

12 Failure to appear at the time and place stated above may be punishable for contempt by the Judge.

13 IT IS FURTHER ORDERED that Plaintiff's Motion for Judgment Debtor Exam at ECF  
14 No. 34 is GRANTED.

15 **IT IS SO ORDERED.**

16 DATED: February 10, 2023.

17 

18 UNITED STATES MAGISTRATE JUDGE

19 Submitted by:

20 BLACK & WADHAMS

21 By: 

22 Brigid M. Higgins, Esq

23 Nevada Bar No: 5990

24 10777 W. Twain Ave., Suite 300

25 Las Vegas, NV 89135

26 Telephone: (702) 869-8801

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28 Attorneys for Plaintiff/Petitioner

*Avocado Oil De Mexico, Inc.,*

**EXHIBIT 1**

1. Bank statements on all checking accounts and/or savings accounts, corporate certificates of deposit or in which the Judgment Debtor Alko has any interest whatsoever either alone or jointly with any other person or persons from the period of January 1, 2021 to the present.
2. All canceled checks written upon any account stated in Paragraph 2 above.
3. All savings deposit books covering any accounts stated in Paragraph 2 above.
4. Statements covering any savings accounts held in savings or loan associations or similar associations belonging to the Judgment Debtor Alko or in which you have or have had any interest whatsoever either alone or jointly with any other person or persons from the period of January 1, 2021 to the present.
5. All savings deposit books covering any accounts in paragraph 5 above.
6. Key to any and all safe deposit boxes whether privately maintained or in any bank or savings and loan or similar association belonging to you or in which you have or have had an interest whatsoever either alone or jointly with any other person or persons for one year preceding the date of this order and all documents relating to that safe deposit box.
7. Any and all documents relating to real property including, but not limited to, deeds of trust, mortgages, deeds, leases, contracts, or other papers reflecting an interest in real property held by the Judgment Debtor Alko.
8. Conveyances or transfers of any real or personal property by Judgment Debtor Alko to a trust or any third party from January 1, 2020 to present.
9. Financial statements of the Judgment Debtor Alko from January 1, 2021 to the present.
10. Any and all documents including, but not limited to, promissory notes or contracts, which reflect any money owed to the Judgment Debtor Alko.

- 1 11. All correspondence from collection agencies and attorneys.
- 2 12. All insurance policies.
- 3
- 4 13. All state and federal income tax and any other tax returns filed by Judgment Debtor Alko for tax  
5 years 2020, to the present, including all exhibits, schedules, forms, and other documents  
6 referenced in or attached to Judgment Debtor Medina's tax returns.
- 7
- 8 14. All documents that constitute or relate to any and all books, records, ledgers, income statements,  
9 balance sheets, check registers, or other memoranda of business or financial conduct, activities,  
10 status, or income of Judgment Debtor Alko from January 1, 2020, to the present.
- 11
- 12 15. All deeds, records, or other documents that identify or relate to real property in which Judgment  
13 Debtor Alko currently owns or claims an interest or did own or claim an interest from January 1,  
14 2020, to the present.
- 15
- 16 16. All documents that identify or relate to any items of personal property in which Judgment Debtor  
17 Alko currently owns or claims an interest with a value (or, if actual value is unknown, with a  
18 believed value) of \$500 or more.
- 19
- 20 17. All documents, items, and things that refer in any way, directly or indirectly, to any and all  
21 accounts (business or personal bank, checking, savings, credit union, or retirement) in which  
22 Judgment Debtor Alko has an interest, including monthly statements (or other period if issued  
23 less frequently) from January 1, 2020, to the present.
- 24
- 25 18. A list, prepared specifically for the purpose of responding to this Order, identifying the names  
26 and addresses of persons who have served as bookkeepers, accountants, or financial advisers for  
27 Judgment Debtor Alko from January 1, 2020, to present.
- 28
19. All documents that refer in any way, directly or indirectly, to the identity of any person or entity  
to whom Judgment Debtor Alko has paid, given, or conveyed any real or personal property with  
a value more than \$500, not in the regular course of business, from January 1, 2020, to present.

- 1 20. All documents that refer in any way, directly or indirectly, to the identity of any person or entity  
2 to whom Judgment Debtor Alko has made a charitable contribution/donation, tithe, offering, gift,  
3 or other donation in the amount of \$500 or more from January 1, 2020, to present.
- 4 21. All documents that refer in any way, directly or indirectly, to any and all motorized vehicles  
5 (including automobiles, trucks, watercraft, aircraft, recreational vehicles, and motorcycles) in  
6 which Judgment Debtor Alko owns or claims an interest.
- 7
- 8 22. All documents that constitute or refer in any way, directly or indirectly, to any appraisal of any  
9 real or personal property prepared for Judgment Debtor Alko or that otherwise reflect the value  
10 of any real or personal property in which Judgment Debtor Alko has or claims an interest.
- 11 23. All documents that evidence or refer in any way, directly or indirectly, to the amount of money  
12 owed to Judgment Debtor Alko by any person or entity.
- 13
- 14 24. All documents that refer in any way, directly or indirectly, to any legal cause of action, either  
15 real or anticipated, by or against Judgment Debtor Alko, other than the underlying case  
16 commenced in the United States District Court for the District of Nevada, (Case No. 2:21-cv-  
17 00946-RFB-BNW) or any other lawsuit that references the incident referred to in this litigation,  
18 including and not limited to any declaratory relief or other action by a carrier of insurance to  
19 determine coverage.
- 20 25. All documents that refer in any way, directly or indirectly, to the anticipated amount of recovery  
21 in any legal cause of action, either real or anticipated, by Judgment Debtor Alko.
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- 23 26. All documents that refer in any way, directly or indirectly, to any cash on hand for Judgment  
24 Debtor Alko as of (a) the date Judgment Debtor Alko first received notice of any kind of this  
25 Order, and (b) the day before the Judgment Debtor Alko's examination as ordered herein.
- 26 27. All documents that identify any accounts receivable owed to Judgment Debtor Alko.
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- 28 28. All documents that identify any notes receivable held by Judgment Debtor Alko or in which  
Judgment Debtor Alko claims any interest.

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29. All documents that identify any stocks, bonds, mutual funds, certificates of deposit, or any other investment owned by Judgment Debtor Alko or in which Judgment Debtor Alko claims any interest.

30. All documents that identify any interest Judgment Debtor Alko has or claims in any business, partnership (limited or general), corporation, limited liability company, limited liability partnership, or joint venture (collectively, the "Business Records").

31. The Articles of Organization, Operating Agreement, meeting minutes, resolutions of Judgment Debtor Alko.