

7/07

1 ELOISA BESADA FURER
2 9812 Winter Palace
3 Las Vegas, Nevada 89145
4 (702)821-5144

5 Defendant in Pro Per

6 **IN THE FAMILY DIVISION**
7 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
8 **IN AND FOR THE COUNTY OF WASHOE**

9 ANDREW E. FURER,
10 Plaintiff,

Case No. DV04-01626
Dept. No. 11

11 vs.

12 ELOISA BESADA FURER,
13 Defendant.

14 _____ /
15 **DEFENDANT'S PROPOSED ORDER**

16 Defendant, ELOISA BESADA FURER, in proper person, proposes the Court to enter an
17 Order as follows:

- 18 1. An Order denying enforcement of the MSA on the ground of mutual revocation
- 19 and/or rescission;
- 20 2. An Order invalidating the MSA on the ground of misrepresentations, fraud and
- 21 overreaching by Plaintiff;
- 22 3. An Order dividing the community property of the parties pursuant to NRS
- 23 123.225;
- 24 4. An Order denying Plaintiff's claim for emotional distress and other tort remedies;
- 25 5. An Order denying any and all of Plaintiff's claims for breach of the MSA or PNA
- 26 by Defendant;
- 27 6. An Order denying Plaintiff's request for alimony waiver;
- 28 7. An Order denying Plaintiff's request for annual gift to son as required in the

- 1 MSA;
- 2 8. An Order awarding preliminary attorneys' fees and costs to Defendant, who is the
- 3 prevailing party on the PNA and the MSA;
- 4 9. An Order compelling Plaintiff to reimburse Defendant on the loss or damages to
- 5 Defendant's personal properties which were sustained while the properties were in
- 6 Plaintiff's possession and control for three years;
- 7 10. An Order denying Plaintiff's request to sanction Defendant for non-appearance to
- 8 the deposition in Las Vegas, Nevada in early April 2007;
- 9 11. An Order awarding \$200,000 to Defendant for renovation and furnishing of the
- 10 Paris condominium, which is presently uninhabitable;
- 11 12. An Order memorializing 'Andrew and Eloisa Furer,' instead of 'The Furer
- 12 Family,' in the scholarship programs for Filipino students, Chair of the
- 13 Department of Economics and Associated Professorship, or, in the alternative, an
- 14 Order compelling Plaintiff to reimburse one half of the Harvard donation, or
- 15 approximately \$2.5 million, to Defendant;
- 16 13. An Order entitling Defendant to Washington Mutual dividends and interests
- 17 accrued from 2004 to 2007;
- 18 14. An Order compelling Plaintiff to reimburse the actual moving cost of the personal
- 19 properties presented by Defendant in the trial. Defendant was unable to retrieve
- 20 the properties earlier because Plaintiff demanded that Plaintiff should take the
- 21 properties 'as is,' which meant as packed by Plaintiff, and refused to take
- 22 responsibility for missing properties and any loss/ damages to the properties
- 23 sustained while they were in Plaintiff's possession and control in the Incline
- 24 residence. Plaintiff stopped the move on September 29, 2004;
- 25 15. An Order compelling Plaintiff to return all of the photographs pursuant to the
- 26 Stipulation originally made by the parties on September 22, 2005 and later
- 27 ordered again by this Court in December 2005, in April 2006, in November 2006,
- 28 and on January 25, 2007. All photographs from Defendant's cars are still

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unaccounted for;

- 16. An Order compelling Plaintiff to return Asian, Oriental antiques missing while they were in the Incline residence, including without limitation, the 19 disputed Oriental antique jars. Plaintiff should bear expenses to ship those antiques to Las Vegas with proper insurance coverage;
- 17. An Order awarding Defendant actual prices of Oriental/Asian Porcelain, ceramics antiques as listed by Defendant according to authentic appraisal in 1993, as the parties were reimbursed for a broken jar in the amount of \$8,000 as it was insured for the same amount according to the appraisal in 1993 by Mr. Frank Carlo, who was one of the suggested names by the Newark Museum before the parties donated antiquities to Newark Museum in 1985;
- 18. An Order for Plaintiff to return Defendant's pineapple fiber clothing; and
- 19. Any other order this Court may deem necessary and proper.

Dated this 7 day of July, 2007.



ELOISA BESADA FURER
Defendant in Proper Person

1 CERTIFICATE OF MAILING

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3 I, hereby certify that on the ____ day of March, 2007, I served pursuant to NRCP 5(b) by
4 depositing in the United States Post Office, at Reno, Nevada, in a sealed envelope, postage fully
5 pre-paid thereon, a true and correct copy of the foregoing **DEFENDANT'S PROPOSED**
6 **ORDER**, addressed to:

7 Shawn B. Meador, Esq.
8 WOODBURN AND WEDGE
9 6100 Neil Road, Suite 500
10 Post Office Box 2311
11 Reno, Nevada 89505

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17 _____
18 Employee of Reno-Carson Messenger Services
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