

# **EXHIBIT N**

September 18, 2007

Via Facsimile (775)325-6603

Judge Chuck Weller

Second Judicial District Court

Washoe County, Reno, Nevada

Dear Judge Weller:

I received the court order directing the Clerk of the Court to execute all documents, including a quitclaim deed, on my behalf. The order was prepared by Mr. Meador and signed by you today. The Order is based upon Mr. Furer's filing of his Notice of Defendant's Failure and Refusal to Comply with Order Authorizing Sale of Incline Residence, Etc. I am writing this letter to inform you that Mr. Furer's Notice is false and, therefore, the Order based upon Mr. Furer's false Notice is simply a mistake and should be revoked by the Court. I have not even received Mr. Furer's alleged Notice, which seems to have been filed on September 17, 2007.

Mr. Furer never presented me any documents to sign for the sale of the Residence until September 17, 2007. It is highly likely that he intentionally did not send me any documents because his ultimate motive was to falsely accuse me for non-compliance. On September 17, 2007, I wrote a letter to Mr. Meador stating that I was willing to sign documents if Mr. Meador, first, was to stipulate that the proceeds should not go to Mr. Furer, which Mr. Meador agreed in his reply on the same day. Mr. Meador further assured me that he would ask the court to make corrections to the inconsistent parts of the previous Order. As a matter of fact, Mr. Meador advised me to contact the escrow company regarding signing of documents necessary to consummate the sale. While I was relying upon Mr. Meador's assurance, Mr. Furer filed a false notice of my failure to comply with the Order on the same day, September 17, 2007. For your review, I am enclosing my letter to Mr. Meador and Mr. Meador's Reply both dated September 17, 2007.

Your honor, I respectfully requests the Court to reconsider the Order directing the Clerk of the Court to execute a quitclaim deed on my behalf. There is absolutely no need for me to quitclaim the residence to Mr. Furer, and such a quitclaim deed has nothing to do with the sale of the residence because I was willing to sign the purchase agreement and bill of sale as I stated in my Opposition to Mr. Furer's Motion to authorize sale of the residence. If the sale does not go through, the quitclaim deed will automatically give our marital residence to Mr. Furer and I will lose my rights and interests. This will unnecessarily create another appeal issue for the Supreme Court.

Re: Furer vs Furer  
(Case No) DVO4-01626  
No: of Pages - 7 Total

I feel like that I have been unjustly treated in court because although I was willing and capable to sign documents for sale of our marital residence, the Court still does not allow me to participate in the sale as if I am disabled or non-existent. My motions and other briefs have constantly been ignored.

Respectfully,

Eloisa B. Furer

Eloisa B. Furer, *In PRO PER.*

cc. Shawn Meador (775)688-3088

*Attachments:*

- 1) Sept. 17, 2007 letter to Meador from Mrs. Furer
- 2) Sept. 17, 2007 letter from Mr. Meador to Mrs. Furer
- 3) Sept. 24, 2007 letter to Judge Willes from Mrs. Furer

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JOHN P. FOWLER  
JOHN E. MURTHA  
STEPHEN S. KENT  
NICHOLAS F. FREY  
W. CHRIS WICKER  
SHAWN B. MEADOR  
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—  
WILLIAM K. WOODBURN (1910-1979)  
VIRGIL H. WEDGE (1912-2000)  
CASEY W. VLAUTIN (1938-2001)  
—  
OF COUNSEL  
JAMES J. HALLIF

September 17, 2007

**SENT VIA FACSIMILE - (702) 228-8553**

Eloisa B. Furer  
9812 Winter Palace  
Las Vegas, NV 89145

Re: Furer v. Furer

Dear Mrs. Furer:

You are correct. The Judge's handwritten note is inconsistent with the type-written language. However, we appreciate that the Judge's substantive decision is that the sale's proceeds will be held in the blocked joint account pending further order of the court. We will stipulate to have the Order corrected to get rid of the inconsistency. I am faxing a copy of this letter to Judge Weller so that his office can correct the error on its own without the need for motion practice.

Because the buyer's have expressed some reluctance to go forward if there are delays, it remains absolutely essential that the deeds and related documents get signed tomorrow morning. If you will go to the title company first thing tomorrow to sign, it will not be necessary for the clerk to sign the documents. You can show the title company this letter and insist that the escrow instructions require the funds to be deposited into the blocked account. The title company already knows that, but I can confirm as well if they have any questions.

I trust that Judge Weller's office will be able to get the correction made as promptly as possible tomorrow. As there is a delay between signing and actually closing, there will be time

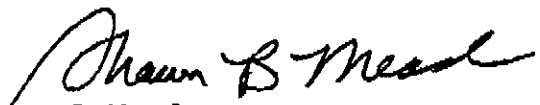
cooperate in this fashion. However, if you are now unwilling to do so or make yourself unavailable, I will have no choice other than to ask the Court to have the Clerk sign the documents on your behalf.

The documents are now at First American Title Company, 8350 West Sahara Ave., Suite 110, Las Vegas, Nevada, for your signature. I am told that this is the First American office that is closest and most convenient to your home and hope that is the case. The escrow officer is Kathleen Lamarche. It would probably be easiest if you call Ms. Lamarche in advance to make arrangement to sign the documents. Her number is (702) 243-2202.

As I am sure you understand based upon your previous experience with buying and selling real estate, the title company will hold the signed documents in escrow until the sale closes. At that time, they will be recorded and the money deposited into the blocked account. If for any reason the sale does not close, the title company will not record the documents.

I am providing the Court with a copy of this letter so that he will know the efforts we have made to get this information to you.

Very truly yours,

  
Shawn B Meador

SBM:jgh

cc: A. Furer

K. Robison

Judge Weller (by fax)

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Code: 1670  
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Attorneys for Plaintiff  
ANDREW EARL FURER

IN THE FAMILY DIVISION  
IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

ANDREW EARL FURER, Case No. DV04-01626  
Plaintiff, Dept. No. 11

vs.

ELOISA BESADA FURER  
Defendant.

**NOTICE OF DEFENDANT'S FAILURE AND REFUSAL TO COMPLY  
WITH ORDER AUTHORIZING SALE OF INCLINE RESIDENCE, ETC.**

Plaintiff Andrew Furer, by an through his attorneys of record Shawn B Meador and the law firm Woodburn and Wedge, hereby files this Notice to the Court of Defendant Eloisa Furer's failure and refusal to execute the deeds, certificates of title, bills of sale and/or other documents required for the sale of the real property located at 949 Lakeshore Blvd., in Incline Village, Nevada.

1 This Notice is based on all papers and pleadings on file herein, including the Court's  
2 Order Authorizing Sale of Incline Residence, Etc., entered on September 11, 2007.  
3

4 This Court is well-familiar with this long divorce case. The most pressing issue now  
5 is the sale of the Incline Village residence. Mr. Furer recently received an offer to purchase  
6 the Incline residence. On September 5, 2007, Mr. Furer filed his Motion to Authorize Sale of  
7 the Incline Residence. On September 10, 2007, Mrs. Furer filed her Opposition to Plaintiff's  
8 Motion Re Sale of the Marital Residence. On September 10, 2007, Mr. Furer filed his Reply  
9 in Support of Motion to Authorize Sale of Incline Residence.  
10

11 On September 11, 2007, this Court entered the Order Authorizing Sale of Incline  
12 Residence, Etc. That Order permits the sale to proceed and specifically provides:

13 6. Mrs. Furer shall have 24 hours within which to execute the quitclaim  
14 deeds, certificates of title, bills of sale on boats and/or other documents  
15 reasonable and necessary to complete these transactions. If she fails or refuses  
16 to do so for any reason, the Clerk of the Second Judicial District Court of the  
17 State of Nevada in and for the County of Washoe, or her designated  
18 representative, shall be authorized to execute the deeds, certificates of title,  
19 bills of sale and/or other documents on Mrs. Furer's behalf. **In the event Mrs.  
Furer fails or refuses to execute the deeds, certificates of title, bills of sale  
and/or other documents, Mr. Furer may file a notice of her failure or  
refusal together with proposed order directing the Clerk of the Court to  
execute such deeds, bills of sale and/or other documents. Mrs. Furer shall  
have 24 hours to respond, if at all, to such notice.**

20 P.2, lns. 24-28, p.3, lns. 1-13 [emph.added].  
21

22 Mr. Furer is filing this Notice pursuant to that Order because, not surprisingly, Mrs.  
23 Furer has failed and refused to execute the necessary documents to move the sale forward.

24 Mr. Furer has tried to make this as convenient as possible for Mrs. Furer. Mrs. Furer  
25 has been notified in writing<sup>1</sup> that the documents requiring her signature are ready and have  
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27 <sup>1</sup> Mrs. Furer was notified in writing by letter dated September 13, 2007. The letter was delivered to  
28 her via FedEx at 9:47 a.m. PST on September 14, 2007. A copy of this letter was successfully faxed  
to her at 2:07 p.m. PST on September 14, 2007. A copy of this letter was faxed to the Court on  
September 13, 2007.

1 been delivered to the First American Title Company office located closest to her residence in  
2 Las Vegas. Mrs. Furer has been notified in writing of the name and phone number of the  
3 escrow officer. Mrs. Furer has been notified in writing that the title company will hold the  
4 signed documents in escrow until the sale closes and, only upon closing, the documents will  
5 be recorded and the money deposited into the blocked account.<sup>2</sup> A copy of the letter and  
6 copies of the successful delivery and transmission of the letter to Mrs. Furer is attached hereto  
7 as Exhibit "A".  
8

9 As set forth in the letter, Mrs. Furer is again making matters difficult by refusing to  
10 return telephone calls and disconnecting her fax machine.  
11

12 This is an \$11 million sale. The realtor is taking a reduced commission. Mr. Furer  
13 and the purchasers wish to complete this sale. The only person obstructing sale is Mrs. Furer.

14 Therefore, based on the foregoing, and pursuant to the Order Authorizing Sale of  
15 Incline Residence, Etc., Mr. Furer hereby notifies the Court that Mrs. Furer has failed and  
16 refused to execute the deeds, bills of sale and other documents necessary to complete the sale.  
17 Because of Mrs. Furer's failure and refusal, Mr. Furer requests that the Court direct that the  
18 Clerk of the Second Judicial District Court of the State of Nevada in and for the County of  
19 Washoe sign all deeds, bills of sale and/or other documents necessary to complete the sale.  
20

21 As with most real estate transactions, some of the documents needing signature may  
22 not be available until closer to the actual closing, such as the preliminary and final escrow  
23 closing statements. From a practical business standpoint, it makes no sense to file serial  
24 motions for every single document that will need signature. That is why Mr. Furer asks that  
25

26  
27 <sup>2</sup> In her opposition, Mrs. Furer claims that she is willing to sign papers at closing. But the contract  
28 for sale of the house calls for a closing with 10 days AFTER she signs the deed. Her idea of signing at  
closing does not work contractually. It is merely a ploy to postpone the sale and make matters  
difficult.

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the Court direct the Clerk of the Court to sign ALL documents necessary to complete the sale, without specifying each and every document that will need signature.

However, a list of the documents that we know will require signature is provided as follows:

- A. Escrow Instructions;
- B. Form 1099;
- C. Commission Instructions;
- D. Grant, Bargain, and Sale Deed;
- E. Declaration of Value form;
- F. Commitment for Title Insurance;
- G. Seller's Estimated Settlement Statement; and
- H. Any and all other documents required for the sale of the Incline Village property.

Additionally, there are also documents that will need to be signed for the sale of the two boats which include a bill of sale and any and all other documents required for the sale of the boats.

Attached hereto is the proposed order directing the Clerk of the Court to execute all such deeds, bills of sale and/or other documents necessary to complete the sale of the Incline Residence and the two boats.

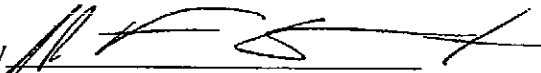
Unless otherwise instructed by the Court, upon receipt of the signed Order, Mr. Furer's counsel will deliver a copy of the Order and the original documents to the Clerk of the Court for signature.

RESPECTFULLY SUBMITTED this 17th day of September, 2007.

DATED this 17<sup>th</sup> day of Sept., 2007.

KENT R. ROBISON  
ROBISON, BELAUSTEGUI,  
SHARP & LOW

WOODBURN AND WEDGE

By   
For: Shawn B Meador #7774  
Attorneys for Andrew Earl Furer

September 14, 2007

Judge Charles Weller  
Second Judicial District Court

Re: Furer v. Furer (Case No. DV04-01626)

Dear Judge Weller:

I received the Request for Submission and Proposed Order submitted by Mr. Shawn B. Meador on Plaintiff's behalf on September 13, 2007. This morning I received the Order granting Plaintiff's Motion. I request the Court for clarification of the Order, which seems to be inconsistent. The Court added in hand-writing that *Proceeds of the sale are to be deposited in the Andrew and Eloisa Furer Trust Account*. At the same time, the Order also *authorized Mr. Furer to deposit and invest the proceeds from the sale in his name as he deems appropriate*. Moreover, I do not believe it to be necessary to execute any documents within 24 hours, because all those documents will be executed at the closing of escrow.

The Court must understand that Mr. Furer has been in control of the parties' joint accounts and his individual accounts, such as \$50 Million of Washington Mutual Stock, \$20 Million in the joint account, the Paris account, etc. If the \$11 Million of the sale proceeds goes to Mr. Furer's control, too, what will be left for me? This expedited motion filed by Mr. Furer was motivated to have the marital assets transferred to him before the final disposition.

I will file a motion for reconsideration or clarification if necessary.

Sincerely yours,



ELOISA B. FURER

CC. Shawn Meador, Esq.

FAX - 775-325-6603 -  
fax - 775-688-3088 -

Judge Weller  
Meador

September 17, 2007

Mr. Shawn Meador  
Fax: (755)688-3088

Re: Furer v. Furer (Case No. DV04-01626)

Dear Mr. Meador:

I have just received your letter dated September 13, 2007 but faxed to my house on September 14, 2007 at 2:06 P.M. I left my house at 1:00 p.m. on Friday. I was out of town during the weekend and just returned home today, September 17, 2007 at 3:00 P.M. to find your letter.

As I said in my Opposition, I agreed to sign documents for sale of the Incline residence if the proceeds should be deposited in a blocked account because Mr. Furer should not be allowed to withdraw or control the proceeds. While Judge Weller ordered, in his hand-writing, the proceeds to be deposited in the joint trust account, the order prepared by your office also contains a provision authorizing Mr. Furer to deposit and invest the proceeds in his name as he deems appropriate. I cannot sign the documents unless Mr. Furer stipulates to strike the provisions inconsistent with the Judge's hand-written order or the Court clarifies the inconsistency.

Once the inconsistent provisions of the order are stricken, I will call Ms. Kathleen Lamarche to sign documents.

Sincerely yours,



---

ELOISA B. FURER

CC. Judge Weller via fax: (775)325-6603

ORIGINAL

FILED

SEP 11 2007

RONALD A. LONGTIN, JR. CLERK  
By: a. a. e.  
DEPUTY

Code: 3370  
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IN THE FAMILY DIVISION  
IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

ANDREW EARL FURER,  
  
Plaintiff,

Case No. DV04-01626

Dept. No. 11

vs.

ELOISA BESADA FURER  
  
Defendant.

ORDER AUTHORIZING SALE OF INCLINE RESIDENCE, ETC.

On September 5, 2007, Mr. Furer filed a Motion to  
Authorize Andrew Furer to Sell Incline Residence, etc.  
(hereafter "Motion to Sell Residence"). On September 10,  
2007, Mrs. Furer filed her Opposition to Mr. Furer's Motion.  
On September 10, 2007, Mr. Furer filed his Reply in Support of  
Motion to Sell Residence and his Request for Submission.

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GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED:

1. Mr. Furer may finalize and consummate the sale of the real property located at 949 Lakeshore Blvd., Incline Village Nevada, in a manner generally consistent with the terms set forth in the Residential Purchase Agreement and Deposit Receipt which was attached as Exhibit 1 to the Affidavit of Victor Lockhart which was filed in support of Mr. Furer's Motion to Sell Residence. *Proceeds of the sale are to be deposited in the Andrew and Elissa Furer Trust account.*

2. Mr. Furer is authorized to pay the outstanding mortgage secured by the residence.

3. Mr. Furer is authorized to sell, in a reasonable manner and for a reasonable price, the two boats that were awarded to him under the terms of the parties' MSA.

4. Mr. Furer is authorized to deposit and invest the proceeds from the sale of the real property and boats in his name as he deems appropriate.

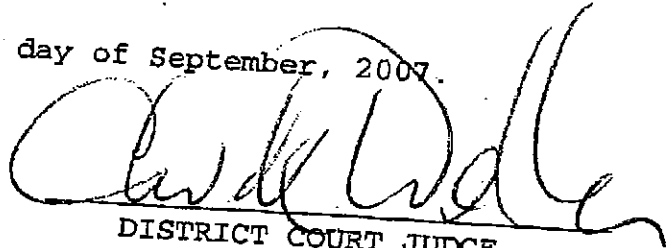
5. Mr. Furer shall have the right to remove and store the personal property presently located in the Incline Residence, including but not limited to the disputed personal property to which Mrs. Furer has made claims.

6. Mrs. Furer shall have 24 hours within which to execute the quitclaim deeds, certificates of title, bills of sale on boats and/or other documents reasonable and necessary to complete these transactions. If she fails or refuses to do

1 so for any reason, the Clerk of the Second Judicial District  
 2 Court of the State of Nevada in and for the County of Washoe,  
 3 or her designated representative, shall be authorized to  
 4 execute the deeds, certificates of title, bills of sale and/or  
 5 other documents on Mrs. Furer's behalf. In the event Mrs.  
 6 Furer fails or refuses to execute the deeds, certificates of  
 7 title, bills of sale and/or other documents, Mr. Furer may  
 8 file a notice of her failure or refusal together with proposed  
 9 order directing the Clerk of the Court to execute such deeds,  
 10 bills of sale and/or other documents. Mrs. Furer shall have  
 11 24 hours to respond, if at all, to such notice.

14 IT IS SO ORDERED.

15 DATED this 11 day of September, 2007.

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 18 DISTRICT COURT JUDGE

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CERTIFICATE OF MAILING

Pursuant to NRCP 5(b), I certify that I am an employee of Woodburn and Wedge and that on this date I deposited in the United States Mail, with postage prepaid, and via Facsimile, a true copy of the foregoing document in an envelope addressed to:

Eloisa B. Furer  
9812 Winter Palace  
Las Vegas, NV 89145  
(702) 228-8553

Kent R. Robison, Esq.  
Robison, Belaustegui, Sharp & Low  
71 Washington Street  
Reno, Nevada 89503  
(775) 329-7169

DATED this 12 day of September, 2007.

Juanita S. Hoyt

**AFFIRMATION**  
**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that the preceding document,

filed in case number:

Document does not contain the social security number of any person

-OR-

Document contains the social security number of a person as required by:

A specific state or federal law, to wit:

\_\_\_\_\_

-or-

For the administration of a public program

-or-

For an application for a federal or state grant

-or-

Confidential Family Court Information Sheet  
(NRS 125.130, NRS 125.230 and NRS 125B.055)

Date: 9-12-07

*Shawn B Meador*  
(Signature)

SHAWN B MEADOR  
(Print Name)

*Plaintiff*  
(Attorney for)

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Attorneys for Plaintiff  
ANDREW EARL FURER

IN THE FAMILY DIVISION  
IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

ANDREW EARL FURER, Case No. DV04-01626  
Plaintiff, Dept. No. 11

vs.

ELOISA BESADA FURER  
Defendant.

NOTICE OF ENTRY

TO: Petitioner, Eloisa Besada Furer, in Pro Per,  
PLEASE TAKE NOTICE that the above-entitled Court entered  
the Order Authorizing Sale Of Incline Residence, Etc. in this  
matter on September 11, 2007.

A copy of the Order Shortening Time is attached hereto

/ / /

1 and incorporated herein by this reference.

2 DATED this 12 day of Sept, 2007.

3  
4 WOODBURN AND WEDGE  
5 6100 Neil Road, Suite 500  
6 Post Office Box 2311  
7 Reno, Nevada 89505

8 By Shawn B Meador  
9 Shawn B Meador  
10 Attorneys for Petitioner  
11 Andrew Earl Furer  
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