M NELSON SEGEL, CHARTE M NELSON SEGEL, ESQUIRE Nevada Bar No. 0530 624 South 9th Street 3 2008 APR 11 A 10:38 Las Vegas, Nevada 89101 4 Telephone: (702) 385-5266 Attorneys for Defendants Larry Hahn 5 and Hahn's World of Surplus, Inc. 6 DISTRICT COURT OF NEVADA 7 COUNTY OF CLARK 8 9 TED R. BURKE; MICHAEL R and LAURETTA CASE NO. A558629 L. KEHOE; JOHN BERTOLDO; PAUL BERNARD; EDDY KRAVETZ; JACKIE 10 DEPT. XIII and FRED KRAVETZ; STEVEN FRANKS; PAULA MARIA BARNARD; PETE T. and LISA A. FREEMAN; LEON GOLDEN; C.A. MURFF; 12 GERDA FERN BILLBE; BOB and ROBYN TRESKA; MICHAEL RANDOLPH, and 13 FREDERICK WILLIS, 14 **Plaintiffs** 15 VS. LARRY L. HAHN, individually, and as President of and Treasurer of Kokoweef, Inc., and former President and Treasurer of Explorations Incorporated of Nevada; HAHN'S WORLD OF SURPLUS, INC., a Nevada corporation; DOES I-X, inclusive; DOE OFFICERS, DIRECTORS and PARTICIPANTS I-XX, CLERK OF THE COURT 20 Defendants. and DATE: 05/19/08 TIME: 9:00 a.m. OKOWEEF, INC., a Nevada corporation; EXPLORATIONS INCORPORATED OF NEVADA, a dissolved Nevada corporation; OKOWEEF, INC., a Nevada corporation; 24 Nominal Defendants. 25 26 MOTION FOR ORDER EXTENDING TIME TO FILE REQUEST FOR SECURITY 27 Defendants Larry Hahn ("HAHN") and Hahn's World of Surplus. ("SURPLUS")("HAHN and SURPLUS sometimes collectively referred to herein as "MOVING 12

DEFENDANTS") hereby moves this Court, pursuant to NRS §41.520(3), for an order extending the 2 time to file a request for security. This Motion is made and based upon all of the pleadings and 3 papers on file and the points and authorities contained herein. DATED this/ day of April, 2008. 4 5 M NELSON SEGEL, CHARTERED 6 7 M NELSON SEGEL, ESQUIRE Nevada-Bar No. 0530 624-South 9th Street 8 9 -Las Vegas, Nevada 89101 Attorneys for Defendants Larry Hahn 10 and Hahn's World of Surplus, Inc. 11 12 **NOTICE OF MOTION** 13 PLEASE TAKE NOTICE that the undersigned will bring on for hearing the foregoing 14 MOTION FOR ORDER EXTENDING TIME TO FILE REQUEST FOR SECURITY on the 19th day of May, 2008, at the hour of 9:00 a.m., in Dept. No. XIII of the above entitled Court. 15 DATED this day of April, 2008. 16 17 M NELSON SEGEL, CHARTERED 18 19 M'NELSON SEGEL, ESQUIRE 20 Nevada Bar No. 0530 624 South 9th Street 21 Las Vegas, Névada 89101 Attorneys for Defendants Larry Hahn 22 and Hahn's World of Surplus, Inc. 23 24 25 26 27 28

POINTS AND AUTHORITIES

NRS §41.520(3) provides:

- 3. In any such action, at any time within 30 days after service of summons upon the corporation or any defendant who is an officer or director of the corporation, or held such office at the time of the acts complained of, the corporation or such defendant may move the court for an order, upon notice and hearing, requiring the plaintiff to furnish security as hereinafter provided. Such motion must be based upon one or more of the following grounds:
 - (a) That there is no reasonable possibility that the prosecution of the cause of action alleged in the complaint against the moving party will benefit the corporation or its security holders.
 - (b) That the moving party, if other than the corporation, did not participate in the transaction complained of in any capacity. The court on application of the corporation or any defendant may, for good cause shown, extend the 30-day period for an additional period or periods not exceeding 60 days.

MOVING DEFENDANTS believe that security would be appropriate in this matter. It is their understanding that Nominal Defendant KOKOWEEF, INC., a Nevada corporation ("KOKOWEEF"), is filing a motion seeking security. At this time, MOVING DEFENDANTS need additional time to evaluate the pending complaint and whether it would be appropriate to seek security in this matter.

MOVING DEFENDANTS request that the Court enter an order extending the time to seek security under NRS §41,520(3) for a period of sixty (60) days.

DATED this _____ day of April, 2008.

M NELŞON SEGEL CHARTERED

M'NELSON SEGEL, ESQUIRE

Nevada Bar No. 0530 624 South 9th Street

Las Vegas, Nevada 89101

Attorneys for Defendants Larry Hahn and Hahn's World of Surplus, Inc.

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 10 day of April, 2008, she served the foregoing MOTION FOR ORDER EXTENDING TIME TO FILE REQUEST FOR SECURITY by causing true and correct copies to be placed in the United States Mail, postage fully prepaid thereon and addressed as follows:

Neil Beller, Esquire 7408 West Sahara Avenue Las Vegas, Nevada 89117

Patrick Clary, Esquire 7201 West Lake Mead Drive, Suite 503 Las Vegas, Nevada 89129

An employee of M NELSON SEGEL CHARTERED