Filed in Douglas District Court
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IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

NEALE FARMS, INC., a Nebraska Corporation, Plaintiff, v. TRIBEDO, LLC, a Nebraska Limited Liability Company, GEORGE TAYLOR D/B/A TAYLOR GRADING, and JV5 Solutions, LLC an Iowa Limited Liability Company, Defendants.	)))))))))))	Case No. CI 14-9471 MOTION TO APPROVE SERVICE OF PROCESS AND MOTIONS FOR DEFAULT JUDGMENT AND NOTICE OF HEARING

MOTION TO APPROVE SERVICE OF PROCESS

Plaintiff, Neale Farms, Inc., by and through its attorney, David V. Drew, moves the Court for on Order approving service on Defendant JV5 Solutions, LLC, pursuant to Neb. Rev. Stat.§21-116. In support thereof, the Plaintiff shows the Court that:

1. Defendant, JV5 Solutions, LLC, is a foreign Limited Liability Company formed in the State of Iowa.
2. The registered agent for service of process for JV5 Solutions, LLC designated with the Iowa Secretary of State is: David W. Overholter, Registered Agent, 532 1st Ave, Suite 312, Council Bluffs, IA 51503.
3. On November 26, 2014, a Summons and a copy of the Complaint were deposited with the United States Postal Service, correctly addressed and with sufficient postage.
4. Plaintiff intends to offer affidavit evidence at the hearing in support of its motion.

Wherefore, the undersigned prays for an Order finding that service of process was effected pursuant to Neb. Rev. Stat.§21-116, effective December 3, 2014.

MOTION FOR DEFAULT JUDGMENT vs. JV5 Solutions, LLC

Comes Now, the Plaintiff, Neale Farms, Inc. and moves the Court for default judgment in its favor and against Defendant JV5 Solutions, LLC, an Iowa Limited Liability Company on the First Claim for Relief as stated in the Plaintiff's Complaint in the amount of $77,750.00, for the reason that Defendant JV5 Solutions, LLC, an Iowa Limited Liability Company has failed to

appear or otherwise file an Answer, pleading or responsive motion to the Complaint of Plaintiff. Plaintiff is entitled to judgment as a matter of law. Plaintiff intends to offer affidavit evidence at the hearing in support of its motion.

Wherefore Plaintiff prays for an Order granting default judgment in its favor for the relief demanded in the Complaint.

MOTION FOR DEFAULT JUDGMENT vs.

George Taylor, d/b/a Taylor Grading

Comes Now, the Plaintiff, Neale Farms, Inc. and moves the Court for default judgment in its favor and against Defendant George Taylor, d/b/a Taylor Grading on the Second Claim for Relief as stated in the Plaintiff's Complaint in the amount of $174,167.33, for the reason that Defendant George Taylor, d/b/a Taylor Grading has failed to appear or otherwise file an Answer, pleading or responsive motion to the Complaint of Plaintiff. Plaintiff is entitled to judgment as a matter of law. Plaintiff intends to offer affidavit evidence at the hearing in support of its motion.

Wherefore Plaintiff prays for an Order granting default judgment in its favor for the relief demanded in the Complaint.

Dated: January 29, 2015.

NEALE FARMS, INC., Plaintiff:

By: _____

David V. Drew (#23153)
Drew Law Firm
P.O. Box 462 – 1555 Washington St.
Blair, NE 68008
(402) 426-2636
Attorney for the Plaintiff

NOTICE OF HEARING

You are hereby notified that a hearing will be held on the Plaintiff's Motion to Approve Service of Process and Motions for Default Judgment vs. JV5 Solutions, LLC and George Taylor d/b/a Taylor Grading on February 11, 2015, at 8:45 a.m. in the District Court of Douglas County, Nebraska, Courtroom #505, 5th Floor, 1819 Farnam St., Omaha, NE 68183, before the Honorable Judge Troia, or as soon thereafter as same may be heard.

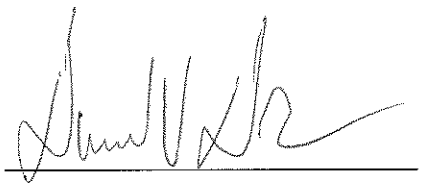
CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on the following parties via U.S. mail, postage prepaid on January ~~28~~ 29, 2015.

Neeraj Agarwal
105 N. 31st Avenue
2nd Floor
Omaha, NE 68131

George Taylor
1905 Clay St.
Ft. Calhoun, NE 68023

JV5 Solutions, LLC
David W. Overholtzer, Reg. Agent
532 1st Ave., Suite 312
Council Bluffs, IA 51503



Certificate of Service

I hereby certify that on Friday, January 30, 2015 I provided a true and correct copy of the Motion Filed to the following:

Taylor,George, service method: First Class Mail

Tribedo LLC represented by Neeraj Agarwal (Bar Number: 24648) service method: Electronic Service to nagarwal@whitelotusgroup.com

JV5 Solutions LLC service method: First Class Mail

Lots 1, 2, 3, 6, 7, and 8 and Outlo service method: First Class Mail

Signature: /s/ David Drew (Bar Number: 23153)