

IN THE SUPREME COURT OF THE STATE OF NEVADA

COYOTE SPRINGS INVESTMENT, LLC;
LINCOLN COUNTY WATER DISTRICT;
AND VIDLER WATER COMPANY, INC.,

Appellants,

vs.

ADAM SULLIVAN, P.E., NEVADA
STATE ENGINEER, DIVISION OF
WATER RESOURCES, DEPARTMENT OF
CONSERVATION AND NATURAL
RESOURCES,

Respondent.

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Elizabeth A. Brown
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Supreme Court No. 85137

District Court Case No.

A816761

JOINT APPENDIX

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CERTIFICATE OF SERVICE

I certify that on the 27th day of December 2022, I served a copy of **JOINT APPENDIX** upon all counsel of record:

BY MAIL: I placed a true copy thereof enclosed in a sealed envelope addressed as follows:

BY FACSIMILE: I transmitted a copy of the foregoing document this date via telecopier to the facsimile number shown below:

BY ELECTRONIC SERVICE: by electronically filing the foregoing document with the Nevada Supreme Court's electronic filing system, which sends an electronic notification to the following parties at the email address on file with the Nevada Supreme Court:

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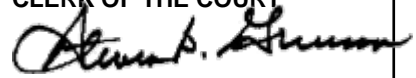
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17 **DISTRICT COURT**
18 **CLARK COUNTY, NEVADA**

19 LAS VEGAS VALLEY WATER DISTRICT,
20 and SOUTHERN NEVADA WATER
21 AUTHORITY, et al.,

Case No. A-20-816761-C

Dept. No. 1

21 Petitioners,

Consolidated with Cases:

22 vs.

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A-20-818015-P
A-20-817977-P
A-20-818069-P
A-20-817840-P
A-20-817876-P
A-21-833572-J

23 ADAM SULLIVAN, P.E., Acting
24 Nevada State Engineer, et al.,

25 Respondent.

26 **LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER COMPANY, INC.'S**
27 **MOTION FOR ATTORNEYS' FEES**

28 **HEARING REQUESTED**

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1 Petitioners, LINCOLN COUNTY WATER DISTRICT (“Lincoln”) and VIDLER WATER
2 COMPANY, INC. (“Vidler” and together with Lincoln the “Petitioners”) by and through their
3 undersigned counsel, hereby respectfully move this Court for an award of attorneys’ fees pursuant to
4 Rule 54(d) of the Nevada Rules of Civil Procedure and NRS 18.010. This Motion is based upon the
5 following Memorandum of Points and Authorities, the Declarations and Exhibits attached hereto, all
6 the pleadings and papers on file in the matter, and any oral argument the Court may consider.

7 **MEMORANDUM OF POINTS AND AUTHORITIES**

8 **I. INTRODUCTION**

9 Petitioners are entitled to an award of attorneys’ fees pursuant to NRS 18.010 both because
10 they recovered less than \$20,000 and because the State Engineer maintained a defense of Order 1309
11 without a legal basis. According to the factors for considering the measure of attorneys’ fees,
12 Petitioners request the Court enter an order awarding all fees expended in this action.

13 **II. LEGAL STANDARDS FOR GRANTING ATTORNEYS’ FEES**

14 NRCP 54(d)(2) allows an award of attorney’s fees post judgment. A claim for attorney’s fees
15 must be made by a motion. NRCP 54(d)(2)(A). Unless a statute or a court order provides otherwise,
16 the motion must:

- 17 (i) be filed no later than 21 days after written notice of entry of
18 judgment is served;
- 19 (ii) specify the judgment and the statute, rule, or other grounds
20 entitling the movant to the award;
- 21 (iii) state the amount sought or provide a fair estimate of it;
- 22 (iv) disclose, if the court so orders, the nonprivileged financial
23 terms of any agreement about fees for the services for which the claim is
24 made; and
- 25 (v) be supported by:
 - 26 (a) counsel’s affidavit swearing that the fees were actually
27 and necessarily incurred and were reasonable;
 - 28 (b) documentation concerning the amount of fees claimed;
 - and
 - (c) points and authorities addressing the appropriate factors
to be considered by the court in deciding the motion.

NRCP 54(d)(2)(B).

Lincoln and Vidler are entitled to an award of attorneys’ fees pursuant to NRS 18.010(2)(a)
& (b). That statute provides:

1 2. In addition to the cases where an allowance is authorized by specific
2 statute, the court may make an allowance of attorney’s fees to a prevailing
3 party:

- 3 (a) When the prevailing party has not recovered more than \$20,000; or
4 (b) Without regard to the recovery sought, when the court finds that the
5 claim, counterclaim, cross-claim or third-party complaint or defense of the
6 opposing party was brought or maintained without reasonable ground or to
7 harass the prevailing party. The court shall liberally construe the provisions
8 of this paragraph in favor of awarding attorney’s fees in all appropriate
9 situations. . . .

7 **A. Timeliness.**

8 This motion is timely as it is filed within 21 days from notice of entry of the Order Vacating
9 Order 1309, which notice was filed on April 19, 2022.

10 **B. Statutory Authority for Awarding Fees.**

11 There are two grounds upon which this Court can award Lincoln and Vidler their attorneys’
12 fees. First, fees can be awarded “[w]hen the prevailing party has not recovered more than \$20,000;”
13 NRS 18.010(2)(a). And second, if the Court finds that the State Engineer’s defense “was brought or
14 maintained without reasonable ground” NRS 18.010(2)(b).

15 First, Petitioners did not recover more than \$20,000, and the Court can award Petitioners’ fees
16 on this basis alone.¹

17 Second, the State Engineer’s defense of Lincoln’s and Vidler’s Petition for Judicial Review
18 was “brought or maintained without reasonable ground” because he had no legal authority to issue
19 Order 1309, in issuing Order 1309 he violated Petitioners constitutional due process rights, and the
20 State Engineer took positions against Lincoln and Vidler in the Order 1309 proceedings and this case
21
22
23

24 ¹ Petitioners acknowledge that the Nevada Supreme Court has held that in order to recover fees under NRS 18.010(2)(a)
25 the prevailing party must have been awarded a money judgment. *See, e.g., Singer v. Chase Manhattan Bank*, 111 Nev.
26 289, 294, 890 P.2d 1305, 1308 (1995). And the Nevada Supreme Court has concluded that fees are not available where a
27 petition for judicial review is brought under NRS 233B. *Nev. Dept. of Human Resources v. Fowler*, 109 Nev. 782, 785-
28 86, 858 P.2d 375, 377 (1993). However, this Petition for Judicial Review was not brought under NRS 233B. Petitioners
contend that this is a judicially-created requirement not contained within the Nevada Revised Statutes, and that this
requirement should be overruled as a remnant of a former version of NRS 18.010. *See Int’l Indus. v. United Mtg. Co.*, 96
Nev. 150, 606 P.2d 163 (1980) (recognizing requirement of monetary award from previous version of NRS 18.010),
overruled in part on other grounds by Sandy Valley Assocs. V. Sky Ranch Estates, 117 Nev. 948, 35 P.3d 964 (2001).

1 in violation of the settlement agreement entered into with Lincoln and Vidler and his previous Ruling
2 granting Lincoln and Vidler water rights in Kane Springs.²

3 The determination of whether a claim or defense has a “reasonable ground” is based on whether
4 there is a legal basis for asserting the claim or defense. *See, Saticoy Bay, LLC v. Terra West*
5 *Collections Grp.*, 491 P.3d 755 (Nev. App. 2021) (affirming district court’s award of fees where claim
6 was brought without a legal basis). Additionally, courts consider a factual claim groundless if the
7 allegations are not supported by evidence at trial. *Bobby Berosini, Ltd. v. People for the Ethical*
8 *Treatment of Animals*, 114 Nev. 1348, 1354, 971 P.2d 383, 387 (1998). To support an award of fees
9 under NRS 18.010(2)(b), there must be evidence in the record that the defense was maintained without
10 reasonable grounds. *Kahn v. Morse Mowbray*, 121 Nev. 464, 479, 117 P.3d 227, 238 (2005). “The
11 decision to award attorney’s fees is within the sound discretion of the trial court,” and will not be
12 disturbed on appeal absent a “manifest abuse of discretion.” *Bobby Berosini, Ltd.*, 114 Nev. at 1354,
13 971 P.2d at 388.

14 **i. The State Engineer lacked factual basis for his defenses.**

15 Here, the State Engineer had no legal basis or factual support for including Kane Springs in
16 the Lower White River Flow System (“LWRFS”). The State Engineer’s defense of Order 1309 was
17 maintained without factual justification based on the following:

18 1. The State Engineer repeatedly and specifically excluded Kane Springs from the fact-
19 finding and preliminary proceedings leading up to Order 1309. Kane Springs was excluded from the
20 Order 1169 pump test. SE ROA at 719. Kane Springs was also specifically excluded from the Order
21 1303 proceedings. SE ROA at 82. Despite this fact, the State Engineer excluded Kane Springs from
22 Order 1169 based on the very same water supply numbers the State Engineer used when he included
23 Kane Springs in the LWRFS. SE ROA at 43, 76-77, 663.

24 2. Neither Lincoln nor Vidler was included in any of the preliminary proceedings even
25 though several federal entities, including the U.S. Fish & Wildlife Service (“USFWS”) and National
26

27 ² In *Zenor v. State*, the Nevada Supreme Court held that in petitions for judicial review brought pursuant to NRS 233B,
28 attorney’s fees were not available under NRS 18.010(2)(b). 412 P.3d 28, 29 (Nev. 2018). Here, the Petition for Judicial
Review was brought under NRS 533, which provides that the “practice in civil cases applies” to the petitions brought under
that Chapter. NRS 533.450(8). Ostensibly, this includes NRS 18.010 found under “Title 2 – Civil Practice” of the Nevada
Revised Statutes.

1 Park Service (“NPS”), requested that Kane Springs be included in the Order 1169 and Order 1303
2 proceedings. SE ROA at 700-701, 718. In fact, the State Engineer specifically overruled the protests
3 by the NPS in granting an appropriation of water to Petitioners and refusing to hold the applications
4 in abeyance. SE ROA at 719.

5 3. The State Engineer issued Ruling 5712 granting 1,000 acre feet of water rights to
6 Lincoln and Vidler after he issued Order 1169 requiring additional pump tests before any further
7 applications could be acted upon in the six other basins of the LWRFS. SE ROA at 720.

8 4. When he issued Ruling 5712, the State Engineer found that pumping groundwater up
9 to 1,000 afa would not have “any measurable impact on the Muddy River Springs that warrants the
10 inclusion of Kane Springs Valley in Order No. 1169.” SE ROA at 719.

11 5. As part of the purpose for issuing Order 1309, the State Engineer’s stated rationale was
12 to protect the Moapa dace. SE ROA at 43-44. However, the State Engineer ignored Petitioners’
13 stipulation with the USFWS to protect the Moapa dace [SE ROA at 36698-36699] which provided the
14 same triggers he recognized in Order 1309 to reduce Petitioners’ groundwater pumping to protect the
15 dace. The State Engineer also ignored the USFWS Biological Opinion obtained by Petitioners that
16 pumping in Kane Springs was not likely to jeopardize the continued existence of the dace [SE ROA
17 at 49906-49973], and testimony from SNWA’s expert who was the former USFWS Field Supervisor
18 that Petitioners were compliant with the Endangered Species Act. SE ROA at 53449 (Sept. 30, 2019
19 Transcript at 1138:10-23, 1139:7-16 (Williams Testimony)); SR ROA at 53443 (Sept. 30, 2019
20 Transcript at 1141:9-11 (Williams Testimony)).

21 6. Prior to issuing Order 1309, the State Engineer designated the six other hydrographic
22 basins comprising the LWRFS as areas in need of further administration under NRS 533.030. SE
23 ROA at 2-3. Kane Springs has never been designated.

24 7. Other than the pumping of groundwater by Lincoln and Vidler to prove water resources
25 were available for appropriation (which pumping led to the issuance of Ruling 5712), no pumping has
26 occurred in Kane Springs which could lead to any decision that groundwater pumping would have a
27 deleterious impact on any other ground or surface water.
28

1 8. The State Engineer included Kane Springs in Order 1309 despite the fact that the data
2 from the Order 1169 pump test was “muted, lagged, obscured by climate response, or comprised by
3 low-resolution data” and “attenuated.” SE ROA at 53.

4 9. Order 1309 allegedly found that the “best available science” indicated that the seven
5 hydrographic basins of the LWRFS were interconnected dictating that they must be managed as one
6 superbasin. But the State Engineer has known since at least 1966 that the entirety of the White River
7 Flow System has been connected but has managed the hydrographic basins separately until issuing
8 Order 1309. SE ROA at 9900.

9 10. Despite issuing Ruling 5712 and permitting 1,000 afa to Lincoln and Vidler which
10 resulted in a vested property right, *Application of Filippini*, 66 Nev. 17, 22, 202 P.2d 535 (1949)
11 (“‘vested right’ is . . . a term describing a water right which has become fixed and established either
12 by diversion and beneficial use or by permit procured pursuant to the statutory water law relative to
13 appropriation.”), the State Engineer stated in this litigation that upon issuing Order 1309, “[t]he State
14 Engineer was not obligated to follow Ruling 5712.” NSE Answering Brief at 22:26-27.

15 11. Finally, in 2007, Petitioners met with the State Engineer regarding a petition for
16 judicial review filed on the denial of additional applications to appropriate water in Kane Springs.
17 Petition at ¶ 12. As part of that settlement, the State Engineer agreed to consider granting Petitioners
18 additional rights in Kane Springs if Petitioners accumulated additional, up-gradient data to support the
19 applications. *Id.*; see also **Exhibit 6**, Kane Springs Agreement (memorializing agreement). In 2009,
20 those applications were again summarily denied leading to a second petition for judicial review. *Id.*
21 at ¶ 15-16. Petitioners and the State Engineer agreed to a settlement agreement reinstating those
22 applications and acknowledging further studies. See Exhibit 6; SE ROA at 33671-33686. Despite
23 those agreements resolving active litigation, the State Engineer effectively denied those applications
24 without considering the data when he issued Order 1309 by limiting pumping in the LWRFS to 8,000
25 afa. SE ROA at 66.

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ii. The State Engineer lacked a legal basis for defending the inclusion of Kane Springs in Order 1309.

Moreover, the State Engineer lacked a legal basis for his decision to defend Order 1309 which “upend[s] the bedrock principles of the prior appropriation doctrine.” Order Vacating Order 1309 at 21. The State Engineer lacked legal authority to deviate from the comprehensive statutory scheme, to include Kane Springs in the LWRFS, or even to create the superbasin. The lack of a legal basis is evident from the following:

1. None of the statutes identified by the State Engineer as authority for Order 1309 provided actual, legislative authority for creation of a superbasin. Order Vacating Order 1309 at 19-29. The State Engineer therefore maintained a defense based on inapplicable authority.

2. As a result of Order 1309, the priorities of all water rights were re-ordered relative to the water rights holders in all seven basins. Order Vacating Order 1309 at 28 & n. 67. Although he argued that Order 1309 did not reprioritize rights, this Court applied the effect of the Order, not the language of the State Engineer.

3. Statutes which authorize management of water by the State Engineer do so by identifying a basin-by-basin method, not combining historically separate basins into a superbasin. *See, e.g.,* NRS 534.011, NRS 534.030, NRS 534.110. There is no statutory authority for redefining water rights within a hydrographic basin which are awarded based on the then-extant boundaries of the basin. There is no statutory authority for joint management of individual basins.

4. The State Engineer historically managed groundwater on a basin-by-basin approach. Order Vacating Order 1309 at 26, *citing* Order 1169, Order 1169A, Ruling 5712, Ruling 6455. Order 1309 completely deviated from all historical applications statutory authority even by prior State Engineers.

5. Nevada law requires that an appropriation of groundwater “allow for a reasonable lowering of the static water level at the appropriator’s point of diversion.” NRS 534.110(4). By issuing Order 1309, the State Engineer prevented any pumping in Kane Springs and ignored this rule of law acknowledging that pumping will necessarily lower the water level.

1 6. The State Engineer violated due process standards in issuing Order 1309 by failing to
2 put the parties on notice “of consideration of the prospective management of the LWRFS” Order
3 Vacating Order 1309 at 31.

4 7. Order 1309 further violated Petitioners due process rights by failing to disclose during
5 the hearing process the criteria on which the decision would be based. Order Vacating Order 1309 at
6 34.

7 Despite the fact that this Court has pointed out that the State Engineer has statutory authority
8 pursuant to the comprehensive scheme to manage water on a basin-by-basin basis (Order Vacating
9 Order 1309 at 26), the State Engineer continues to allege that he has no other mechanisms for
10 managing water resources within the LWRFS unless Order 1309 is preserved. State Engineer’s Partial
11 Joinder to LVVWD and SNWA’s Motion for Stay Pending Appeal at 2:7-12 (“In the absence of Order
12 1309, which establishes a maximum amount of groundwater pumping that can be sustained within the
13 aquifer delineated as the [LWRFS], the State Engineer is without means to address the next
14 management and administrative steps to identify how to balance the interests of the water rights
15 holders within the LWRFS while being protective of the water resource.”) (emphasis added).

16 **C. Amount of Fees Sought.**

17 The amount of attorneys’ fees Petitioners seek is \$333,187.50. *See* NRCP 54(d)(2)(B)(iii).
18 Counsel for Petitioners will disclose, if so ordered by the Court, the non-privileged financial terms of
19 any agreement about fees for the service for which the claim is made. *See* NRCP 54(d)(2)(B)(iv).
20 This Motion is supported by counsels’ declarations swearing that the fees were actually and
21 necessarily incurred and were reasonable, as well as documentation concerning the amount of fees
22 claimed as required by NRCP 54(d)(2)(B)(v). **Exhibit 1**, Peterson Decl.; **Exhibit 2**, Frehner Decl.;
23 **Exhibit 3**, Klomp Decl.; **Exhibit 4**, Allison MacKenzie Billing; **Exhibit 5**, Great Basin Law Billing.
24 Points and authorities addressing the appropriate factors to be considered by the Court in deciding the
25 NRCP 54 portion of the Motion are set forth below. *See* NRCP 54(d)(2)(B)(v)(c).

26 “In determining the amount of fees to award, the court is not limited to one specific approach;
27 its analysis may begin with any method rationally designed to calculate a reasonable amount.” *Logan*
28 *v. Abe*, 131 Nev. Adv. Op. 31, 350 P.3d 1139, 1143 (2015); *Haley v. Dist. Ct.*, 128 Nev. 171, 178, 273

1 P.3d 855, 860 (2012). Nevada courts frequently employ the factors enumerated in *Brunzell v. Golden*
2 *Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969) to determine the reasonableness of the
3 requested fees. Specifically, under *Brunzell*, the following factors are relevant in determining the
4 reasonableness of an attorney fee award:

5 (1) the qualities of the advocate: his ability, his training, education,
6 experience, professional standing and skill; (2) the character of the work to
7 be done: its difficulty, its intricacy, its importance, time and skill required,
8 the responsibility imposed and the prominence and character of the parties
9 where they affect the importance of the litigation; (3) the work actually
performed by the lawyer: the skill, time and attention given to the work; (4)
the result: whether the attorney was successful and what benefits were
derived.

10 *Id.* Each of these factors must be given consideration. *Id.* With the foregoing in mind, each factor is
11 examined below showing the reasonableness of the fees sought by Petitioners.

12 *i. Petitioners Retained Highly Qualified Attorneys.*

13 Vidler retained Allison MacKenzie, Ltd. (“Allison MacKenzie”), a highly rated and regarded
14 law firm located in Carson City, Nevada. Vidler is represented in court by Karen Peterson, a partner
15 at Allison MacKenzie, who is a member in good standing of the Nevada Bar. The firm’s information
16 contained on Allison MacKenzie’s website is attached to Ms. Peterson’s Declaration, which includes
17 the individual bio of Ms. Peterson. Research and drafting was performed by partners, associates and
18 a law clerk employed by the firm. *See Exhibit 1*, Peterson Declaration, at ¶ 5.

19 Lincoln retained Dylan Frehner, the District Attorney, to represent it during the preliminary
20 proceedings on a contractual basis. *Exhibit 2*, Frehner Decl. at ¶¶ 4-5. Lincoln later added Wayne
21 Klomp of Snell & Wilmer and subsequently of Great Basin Law during the pendency of the Petition
22 for Judicial Review. *Exhibit 3*, Klomp Decl. at ¶ 5. Both are members in good standing of the Nevada
23 Bar and have extensive experience in litigation and public law. *Exhibit 2*, Frehner Decl. at ¶¶ 2, 7;
24 *Exhibit 3*, Klomp Decl. at ¶¶ 2-4, 9.

25 *ii. Petitioners’ Attorneys Performed Complex Work.*

26 As to the second factor, the work performed by Petitioners’ counsel required counsel to gain
27 an immediate understanding of the nature of Petitioners’ claims and understand and apply Nevada law
28 to the constitutional and statutory issues raised by Order 1309 and in the context of the evidence of the

1 record in the Order 1309 proceedings. The process of distilling these complex issues into
2 understandable and accessible presentations required significant time and skill. Water law is intricate
3 and specialized, Order 1309 raised issues of first impression and statewide importance, there was
4 consider responsibility in representing Petitioners in this important litigation in which Petitioners had
5 to overcome the statutory burden that Order 1309 was prima facie correct, and they had the burden of
6 proof that the State Engineer erred in issuing Order 1309. See **Exhibit 1**, Peterson Decl. at ¶¶ 9-10;
7 **Exhibit 2**, Frehner Decl. at ¶¶ 8-9; **Exhibit 3**, Klomp Decl. at ¶¶ 10-11.

8 *iii. Petitioners' Attorneys Provided Significant Work, Skill, Time, and Attention.*

9 As to the third factor, the work actually performed in this matter strongly supports the
10 reasonableness of the requested fees. As demonstrated in the attached Declarations (Exhibits 1 through
11 3) and other exhibits attached hereto, Petitioners' attorneys performed extensive and necessary work
12 to research issues prior to filing the Petition, drafted and filed the Petition for Judicial Review,
13 researched and drafted the Opening and Reply Briefs, and prepared for the district court arguments on
14 the merits. Moreover, the number of hours expended was reasonable and necessary in view of the
15 complex nature of this case, numerous legal issues raised in the briefing, the extensive Record on
16 Appeal and factual matters that needed to be included in the briefing, the property rights and interests
17 in controversy, and the volume/length of the briefs and number of cases cited in the briefing. See
18 **Exhibit 1**, Peterson Declaration at ¶¶ 9-12. Allison MacKenzie's hourly rates are within the range of
19 prevailing market rates in the Carson City area. *Id.* at ¶¶ 7-8. The Lincoln County District Attorney
20 provided services at a significantly reduced rate based on a contract to provide services to Lincoln.
21 **Exhibit 2**, Frehner Decl. at ¶¶ 5-6. Great Basin Law's hourly rates are substantially lower than the
22 market rates in the Reno area and reflect an agreement for legal services providing discounted rates to
23 Lincoln. **Exhibit 3**, Klomp Decl. at ¶¶ 7-8.

24 *iv. Petitioners' Counsel Obtained a Highly Favorable Result.*

25 As to the fourth factor, counsel were successful in obtaining a favorable result for their clients.
26 As a result of counsel's work on this matter, this Court found in Petitioners' favor that Order 1309
27 violated Nevada law and violated Petitioners' constitutional due process rights, thus awarding the
28 relief sought in their Petition for Judicial Review.

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1 **IV. CONCLUSION**

2 Petitioners' claim \$333,187.50 in attorney's fees which resulted in the restoration of
3 Petitioners' vested property rights reflected in their permitted rights in Kane Springs Valley
4 hydrographic basin. The claim for attorneys' fees is reasonable given the nature of the work and the
5 result obtained. Based on the foregoing, Petitioners request the Court grant their Motion for an Award
6 of Attorneys' Fees.

7 DATED this 10th day of May, 2022.

8 LINCOLN COUNTY DISTRICT ATTORNEY
9 181 North Main Street, Suite 205
10 P.O. Box 60
11 Pioche, Nevada 89043
12 Telephone: (775) 962-8073

13 /s/ Dylan V. Frehner
14 DYLAN V. FREHNER #9020
15 Email: dfrehner@lincolncountynv.gov

16 GREAT BASIN LAW
17 1783 Trek Trail
18 Reno, Nevada 89521
19 Telephone: (775) 770-0386

20 /s/ Wayne O. Klomp
21 WAYNE O. KLOMP #10109
22 Email: wayne@greatbasinlawyer.com

23 *Attorneys for Lincoln County Water District*

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27 Telephone: (775) 687-0202

28 /s/ Karen A. Peterson
KAREN A. PETERSON #366
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Attorneys for Vidler Water Company, Inc.

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALLISON MacKENZIE, LTD., Attorneys at Law, and that on this date, I caused a true and correct copy of the foregoing document to be served on all parties to this action by electronic service to the participants in this case who are registered with the Eighth Judicial District Court’s Odyssey eFileNV File & Service system in this matter.

DATED this 10th day of May, 2022.

/s/ Nancy Fontenot
NANCY FONTENOT

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TABLE OF EXHIBITS

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<u>Exhibit No.</u>	<u>Description</u>	<u>Pages</u>
Exhibit 1	Declaration of Karen Peterson	05
Exhibit 2	Declaration of Dylan Frehner	04
Exhibit 3	Declaration of Wayne Klomp	05
Exhibit 4	Bills from Allison MacKenzie, Ltd.	76
Exhibit 5	Bills from Great Basin Law and Snell & Wilmer L.L.P.	50
Exhibit 6	Kane Springs Settlement Agreement	13

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EXHIBIT “1”

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1 **DECL**

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Nevada State Bar No. 366
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13 Telephone: (775) 687-0202
Email: kpeterson@allisonmackenzie.com

14 Attorneys for Petitioners, LINCOLN COUNTY
15 WATER DISTRICT and VIDLER WATER
16 COMPANY, INC.

17 **DISTRICT COURT**
18 **CLARK COUNTY, NEVADA**

19 LAS VEGAS VALLEY WATER DISTRICT,
20 and SOUTHERN NEVADA WATER
AUTHORITY, et al.,

Case No. A-20-816761-C

Dept. No. 1

21 Petitioners,

Consolidated with Cases:

22 vs.

A-20-817765-P

A-20-818015-P

A-20-817977-P

23 ADAM SULLIVAN, P.E., Acting
24 Nevada State Engineer, et al.,

A-20-818069-P

A-20-817840-P

A-20-817876-P

25 Respondent.

A-21-833572-J

26 **DECLARATION OF KAREN A. PETERSON IN SUPPORT OF LINCOLN COUNTY**
27 **WATER DISTRICT'S AND VIDLER WATER COMPANY, INC.'S**
28 **MOTION FOR ATTORNEYS' FEES**

///

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**DECLARATION OF KAREN A. PETERSON IN SUPPORT OF LINCOLN COUNTY
WATER DISTRICT'S AND VIDLER WATER COMPANY, INC.'S
MOTION FOR ATTORNEYS' FEES**

KAREN A. PETERSON, ESQ., does hereby certify and declare as follows:

1. I am an attorney and a partner of ALLISON MacKENZIE, LTD. and I am the attorney of record for Petitioner, Vidler Water Company, Inc. ("Vidler") in the above-entitled action. I have personal knowledge of all matters set forth herein and I am competent to testify to the same. I make this Declaration in support of Lincoln County Water District's ("Lincoln") and Vidler's Motion for Attorneys' Fees.

2. I am an attorney duly licensed and admitted to practice before all courts in the State of Nevada, and I am a member in good standing with the State Bar of Nevada.

3. Attached to this Declaration as an Exhibit are copies of our firm's information along with biographical information about each attorney employed by our firm.

4. ALLISON MacKENZIE is a Nevada law firm recognized for handling complex legal disputes, including water matters, located in Carson City, Nevada.

5. I am responsible for the preparation and presentation of this case and related matters on behalf of Vidler. Lincoln and Vidler have similar interests in this case and all pleadings and papers filed in this matter on behalf of Lincoln and Vidler were prepared by my firm and/or by Dylan Frehner or Wayne Klomp, the attorneys of record for Lincoln. Lincoln and Vidler worked cooperatively on all pleadings and papers on file in this matter to avoid duplication of attorneys' fees. Other attorneys employed as associates by ALLISON MacKENZIE, LTD. worked at various times on Petitioners' matters as indicated in our firm's billing statements. One law clerk worked on this matter.

6. Our firm has one client number for Vidler with time and costs entered into two separate billing matters for Vidler related to the Order 1309 court proceedings. One matter was for all the work involved in filing the petition for judicial review and related proceedings in the district court, and one matter was for the appeal of the Seventh Judicial District Court's order granting motion for change of venue filed in the Nevada Supreme Court as Case No. 81792.

7. In these matters, my time and the time of all partners in our firm was billed at the rate of \$300.00 per hour. Associates were billed at the rate of \$250.00 per hour.

1 8. The rates charged by our firm are consistent and comparable to what other law
2 firms charge clients in Carson City for similar matters. Moreover, our firm’s rates are supported by
3 the experience of its counsel, and their experience in matters like this one.

4 9. Counsel for Petitioners, including the undersigned and her firm, were required
5 to gain an immediate understanding of the nature of Petitioners’ claims and understand and apply
6 Nevada law to the constitutional and statutory issues raised by Order 1309 and in the context of the
7 evidence of record in the Order 1309 proceedings. The process of distilling these complex issues into
8 understandable and accessible presentations required significant time and skill. Water law is intricate
9 and specialized, Order 1309 raised issues of first impression and of statewide importance, there was
10 considerable responsibility in representing Petitioners in this important litigation in which Petitioners
11 had to overcome the statutory burden that Order 1309 was prima facie correct, and in which Petitioners
12 had the burden of proof that the State Engineer erred in issuing Order 1309.

13 10. Vidler’s attorneys performed extensive and necessary work to research issues,
14 errors and claims for relief on judicial review prior to filing the petition for judicial review, drafted
15 and filed the petition for judicial review, researched and drafted or responded to the motions to change
16 venue and numerous motions to intervene, drafted opening and reply briefs and filed an answering
17 brief in response to numerous opening briefs filed by other Petitioners in this consolidated action,
18 prepared for and attended the district court arguments on the petitions for judicial review and attended
19 numerous status conferences held by the Court. The number of hours expended was reasonable and
20 necessary in view of the complex nature of this case, numerous legal issues raised in the motions and
21 briefing, the extensive administrative record on appeal, the nature of this controversy, and the
22 volume/length of the briefs and number of cases cited in the briefing.

23 11. As a result of counsel’s significant and substantial work and costs related to
24 appealing the State Engineer’s Order 1309, the Court issued its Order Vacating Order 1309 on April
25 19, 2022.

26 12. The number of hours counsel expended in prosecuting this action on behalf of
27 Petitioners, including Vidler, and in opposing the State Engineer’s positions and those of numerous
28 other Petitioners and Intervenors who supported Order 1309 was reasonable and necessary given the

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1 complex nature of the case and claims, the numerous legal issues involved, the volume/length of briefs
2 and the nature of the controversy. All of the attorney's fees incurred by Vidler are reasonable and
3 were necessary.

4 13. Submitted with Petitioners' Motion for Attorneys' Fees and this Declaration as
5 **Exhibit "4"** are redacted copies of Allison MacKenzie, Ltd. billing statements showing the total
6 invoiced amount as of April 30, 2022 for the district court matter and for the Supreme Court Case No.
7 81792 matter. Vidler claims \$221,172.50 in fees from the district court matter and \$2,055.00 in fees
8 from the Nevada Supreme Court Case No. 81792 matter, for a total of \$233,227.50.

9 14. Vidler has submitted these invoices with redactions to ensure that confidential
10 attorney-client and/or attorney work product information is not disclosed. However, upon the Court's
11 request, Vidler will provide un-redacted copies of Allison MacKenzie, Ltd.'s invoices for the Court to
12 review *in camera*.

13 IN WITNESS WHEREOF, the undersigned, KAREN A. PETERSON, ESQ., has
14 hereunto set her hand this 10th day of May, 2022.

15 
16 _____
17 KAREN A. PETERSON, ESQ.

18
19 4875-9034-8063, v. 1
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EXHIBIT “2”

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15 **DISTRICT COURT**
16 **CLARK COUNTY, NEVADA**

18 LAS VEGAS VALLEY WATER DISTRICT,
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19 AUTHORITY, et al.,

Case No. A-20-816761-C
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20 Petitioners,
21 vs.

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A-20-817876-P
A-21-833572-J

22 ADAM SULLIVAN, P.E., Acting
Nevada State Engineer, et al.,

23 Respondent.
24 _____/

25 **DECLARATION OF DISTRICT ATTORNEY DYLAN FREHNER IN SUPPORT OF**
26 **LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER COMPANY INC.'S**
27 **MOTION FOR ATTORNEYS' FEES**

28 1. I am the Lincoln County District Attorney, and I am one of the attorneys of record for Petitioner Lincoln County Water District ("Lincoln") in the above-entitled action. I have

1 personal knowledge of all matters set forth herein and I am competent to testify to the same. I make
2 this Declaration in support of Lincoln County Water District’s and Vidler Water Company Inc.’s
3 (“Vidler” and with Lincoln, the “Petitioners”) Motion for Attorneys’ Fees.

4 2. I am an attorney duly licensed and admitted to practice before all courts in the
5 State of Nevada, and I am a member in good standing with the State Bar of Nevada.

6 3. Prior to serving as District Attorney, I formed and operated my own law practice
7 as Dylan V. Frehner, Attorney at Law, a Professional Corporation, for several years during which time
8 I represented Lincoln and various other public and private entities on a myriad of civil and criminal
9 matters.

10 4. I and Wayne Klomp of Great Basin Law are co-counsel on behalf of Lincoln
11 and are responsible for the preparation and presentation of this case and related matters on behalf of
12 Lincoln. Lincoln and Vidler have similar interests in this case, and all pleadings and papers filed in
13 this matter on behalf of Lincoln were prepared by me or Mr. Klomp as co-counsel for Lincoln and/or
14 the law firm of Allison MacKenzie, Ltd., the attorneys of record for Vidler.

15 5. The Office of the Lincoln County District Attorney has had contracts to perform
16 flat-rate legal services to the Lincoln County Water District for several years. Those contracts are a
17 matter of public record and were for the amounts as follows for the fiscal years identified:

- 18 FY 2020 – \$18,000
- 19 FY 2021 – \$36,000
- 20 FY 2022 – \$18,000

21 6. I estimate that the amount of time spent on this Petition for Judicial Review for
22 each year is as follows: FY 2020 – 25%; FY 2021 – 25%; FY 2022 – 75%. I estimate that the
23 percentage of the contract fee based on the percentages of time spent on this matter is \$27,000.

24 7. I have been practicing law in Nevada for over 17 years on both civil and
25 criminal matters as District Attorney, Assistant District Attorney, and private attorney. I have
26 represented many public entities on various criminal and civil matters, and have been practicing water
27 law in Nevada for over 10 years.

28

EXHIBIT “3”

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13 Attorneys for Petitioners, LINCOLN COUNTY
14 WATER DISTRICT and VIDLER WATER
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15 **DISTRICT COURT**
16 **CLARK COUNTY, NEVADA**

18 LAS VEGAS VALLEY WATER DISTRICT,
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A-20-817840-P
A-20-817876-P
A-21-833572-J

22 ADAM SULLIVAN, P.E., Acting
Nevada State Engineer, et al.,
23 Respondent.
24 _____/

25 **DECLARATION OF WAYNE KLOMP IN SUPPORT OF**
26 **LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER COMPANY INC.'S**
27 **MOTION FOR ATTORNEYS' FEES**

28 1. I am an attorney at Great Basin Law, and I am one of the attorneys of record for
Petitioner Lincoln County Water District ("Lincoln") in the above-entitled action. I have personal

1 knowledge of all matters set forth herein and I am competent to testify to the same. I make this
2 Declaration in support of Lincoln County Water District's and Vidler Water Company Inc.'s ("Vidler"
3 and with Lincoln, the "Petitioners") Motion for Attorneys' Fees.

4 2. I am an attorney duly licensed and admitted to practice before all courts in the
5 State of Nevada, and I am a member in good standing with the State Bar of Nevada.

6 3. Prior to forming Great Basin Law, I was an associate attorney at Snell & Wilmer
7 L.L.P. based in its Reno office.

8 4. Great Basin Law is a Nevada law firm which handles commercial litigation,
9 including water disputes, located in Reno, Nevada.

10 5. Dylan Frehner, Lincoln County District Attorney, and I are co-counsel on behalf
11 of Lincoln and are responsible for the preparation and presentation of this case and related matters on
12 behalf of Lincoln. Lincoln and Vidler have similar interests in this case, and all pleadings and papers
13 filed in this matter on behalf of Lincoln and Vidler were prepared by Mr. Frehner or me as co-counsel
14 for Lincoln and/or the law firm of Allison MacKenzie, Ltd., the attorneys of record for Vidler.

15 6. While at Snell & Wilmer, one client number was assigned to Lincoln with all
16 time and costs entered into a billing number for all work involved with this petition for judicial review,
17 Client Matter #82212.00002. My time while at Snell & Wilmer was billed at a rate of \$275 per hour.

18 7. The rate charged by Snell & Wilmer reflected a reduced rate and below what
19 other law firms charge clients in similar matters. The rate charged at Snell & Wilmer is supported by
20 the experience of its counsel, and experience in other matters like this one.

21 8. Once Great Basin Law was formed, time was billed at a rate of \$200 per hour for
22 a fixed number of hours per month. Once billing exceeded the fixed number of hours, time was billed
23 at a rate of \$300 per hour. These rates reflect a reduced rate agreement with Lincoln, and are similar to
24 the rates paid by other public entities to similar firms. Time spent on Lincoln matters is identified
25 separately in each billing statement for LCWD as reflected in the billing statements attached to the
26 Motion as Exhibit 5.

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28

1 9. I have been practicing law in Nevada for over 15 years as a commercial and
2 complex litigation attorney first at Jones Vargas, then with Fennemore Craig Jones Vargas, the Office
3 of Attorney General, Snell & Wilmer. In 2021 I formed Great Basin Law.

4 10. Counsel for Petitioners, including the undersigned, were required to gain an
5 immediate understanding of the nature of the Petitioners' claims and understand and apply Nevada law
6 to the constitutional and statutory issues raised by Order 1309 and in the context of the evidence of
7 record in the Order 1309 proceedings. The process of distilling these complex issues into understandable
8 and accessible presentations required significant time and skill. Water law is intricate and specialized,
9 Order 1309 raised issues of first impression and of statewide importance, there was considerable
10 responsibility in representing Petitioners in this important litigation in which the Petitioners had to
11 overcome the statutory burden that Order 1309 was prima facie correct, and in which the Petitioners had
12 the burden of proof that the State Engineer erred in issuing Order 1309.

13 11. Lincoln's attorneys performed extensive and necessary work to research issues,
14 errors, and claims for relief on judicial review prior to filing the Petition, drafted and filed the petition
15 for judicial review, researched and drafted or responded to the motion to change venue and numerous
16 motions to intervene, drafted opening and reply briefs, and filed an answering brief in response to
17 numerous opening briefs filed by other petitioners in this consolidated action, prepared for and attended
18 the district court arguments on the petitions for judicial review, and attended numerous status
19 conferences held by the Court. The number of hours expended was reasonable and necessary in view
20 of the complex nature of this case, numerous legal issues raised in the motions and briefing, the
21 volume/length of the briefs, and number of cases cited in the briefing.

22 12. As a result of counsel's significant and substantial work and costs related to
23 appealing the State Engineer's Order 1309, the Court issued its Order Vacating Order 1309 on April 19,
24 2022.

25 13. The number of hours counsel expended in prosecuting this action on behalf of
26 Petitioners, including Lincoln, and in opposing the State Engineer's positions and those of numerous
27 other petitioners and intervenors who supported Order 1309 was reasonable and necessary given the
28 complex nature of the case and claims, the numerous legal issues involved, the volume/length of briefs,

1 and the nature of the controversy. All of the attorney’s fees incurred by Lincoln were reasonable and
2 necessary.

3 14. Submitted with Petitioners’ Motion for Attorneys’ Fees and this Declaration and
4 attached to the Motion for Attorneys’ Fees as **Exhibit “5”** are redacted copies of billing statements of
5 Snell & Wilmer and Great Basin Law for this matter. The invoices from Great Basin Law for this matter
6 contain fees billed for time on other legal matters billed to LCWD. Those entries have been entirely
7 redacted. Lincoln claims \$10,670.00 in fees from Snell & Wilmer for 38.8 hours of work at \$275 per
8 hour and \$72,290.00 in fees from Great Basin Law for 287.2 hours of work at \$200 per hour and 49.5
9 hours of work at \$300 per hour.

10 15. Lincoln has submitted these invoices with redactions to ensure that confidential
11 attorney-client and/or attorney work product information is not disclosed. However, upon the Court’s
12 request, Lincoln will provide un-redacted copies of all invoices for the Court to review *in camera*.

13 DATED this 10th day of May, 2022.

14
15 /s/ Wayne Klomp
16 Wayne Klomp, Esq.
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EXHIBIT “4”



PO Box 646 · Carson City · NV 89702
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AllisonMacKenzie.com

June 29, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 191335
Client No.: 08132
Matter No.: 46
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through June 24, 2020:

RE: Lower White River Flow System - St. Eng. Order No. 1303

Professional Services Rendered	\$ 5,190.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 5,190.00

Invoice No.: 191335

June 29, 2020

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/15/20	KAP	Read portions of Order #1309, meeting at Vidler [REDACTED]	4.00	300.00	1,200.00
6/16/20	JT	Re: research [REDACTED]	2.00	175.00	350.00
6/16/20	KAP	Telephone conference with Steve Hartman [REDACTED]	.60	300.00	180.00
6/17/20	JT	Re: research case law and statutes; prepare memo for client.	2.90	175.00	507.50
6/17/20	KAP	Telephone conference with Dorothy Timian Palmer, [REDACTED]	.50	300.00	150.00
6/18/20	JT	Re: research case law and statutes; prepare memo for client.	2.50	175.00	437.50
6/18/20	KAP	Telephone conference [REDACTED] met with Dorothy Timian Palmer and Steve Hartman [REDACTED]	.60	300.00	180.00
6/19/20	JT	[REDACTED]	3.30	175.00	577.50
6/19/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Steve Hartman [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	1.00	300.00	300.00
6/22/20	JT	Re: research and memorandum regarding Order 1309	4.80	175.00	840.00
6/22/20	KAP	Met with Dorothy Timian Palmer, Steve Hartman and Greg Bushner [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.80	300.00	240.00
6/23/20	JT	Re: further revisions to draft of memorandum	1.30	175.00	227.50

TOTAL PROFESSIONAL SERVICES RENDERED \$ 5,190.00

Invoice No.: 191335

June 29, 2020

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	7.50	300.00	2,250.00
Jackson Tann	16.80	175.00	2,940.00
TOTALS	24.30		\$ 5,190.00

TOTAL THIS INVOICE

\$ 5,190.00



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AllisonMacKenzie.com

August 31, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 192095
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through July 31, 2020:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 16,760.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 16,760.00

Invoice No.: 192095

August 31, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
7/02/20	KAP	Telephone conference with Dylan Frehner [REDACTED]	.25	300.00	75.00
7/05/20	KAP	Worked on petition for judicial review of State Engineer order 1309	4.00	300.00	1,200.00
7/07/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	5.75	300.00	1,725.00
7/08/20	KAP	Telephone conference with Steve Hartman [REDACTED] [REDACTED] telephone conference with Dylan Frehner [REDACTED] worked on petition for judicial review	4.75	300.00	1,425.00
7/09/20	KAP	Telephone conference with Dorothy Timian Palmer, Ryan Hoerth and Greg Bushner, telephone conference with Dorothy Timian Palmer and Ryan Hoerth, telephone conference with Greg Bushner, telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Dylan Frehner [REDACTED] telephone conference with Dorothy Timian Palmer, drafted notice of petition for judicial review	3.00	300.00	900.00
7/10/20	KAP	Numerous telephone conferences with Dylan Frehner, worked on petition for judicial review	3.50	300.00	1,050.00
7/12/20	KAP	[REDACTED]	1.50	300.00	450.00
7/13/20	KAP	Read Dylan Frehner email [REDACTED] [REDACTED] telephone conference with Dylan Frehner, telephone conference with Dylan Frehner [REDACTED]	3.00	300.00	900.00
7/14/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.20	300.00	60.00
7/15/20	KAP	Telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	1.00	300.00	300.00

Invoice No.: 192095

August 31, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
7/17/20	KAP	Email to Vidler [REDACTED]	.25	300.00	75.00
7/20/20	KAP	Telephone conference with Steve Hartman [REDACTED]	.25	300.00	75.00
7/22/20	KAP	Telephone conference with John LeMaster, Dorothy Timian Palmer, Steve Hartman and Greg Bushner, [REDACTED] telephone conference with Dorothy Timian Palmer regarding [REDACTED]	1.80	300.00	540.00
7/23/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.70	300.00	210.00
7/24/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Steve Hartman [REDACTED]	1.70	300.00	510.00
7/27/20	JMM	Review AG's Motion to Change Venue; Research [REDACTED] drafting Opposition to Motion to Change Venue	4.30	250.00	1,075.00
7/27/20	KAP	Read State Engineer's motion to change venue, research [REDACTED]	1.20	300.00	360.00
7/28/20	JMM	Research [REDACTED] worked on Opposition to Motion to Change Venue	8.70	250.00	2,175.00

Invoice No.: 192095

August 31, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
7/28/20	KAP	[REDACTED] [REDACTED] Vidler for conference call [REDACTED]	4.20	300.00	1,260.00
7/29/20	JMM	Complete Opposition to Motion to Change Venue	2.50	250.00	625.00
7/29/20	KAP	Telephone conference with Steve Hartman [REDACTED] [REDACTED] telephone conference with Steve Hartman and Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dylan Frehner [REDACTED] telephone conference [REDACTED] telephone conference with Dylan Frehner, [REDACTED] [REDACTED]	1.10	300.00	330.00
7/30/20	KAP	[REDACTED]	2.00	300.00	600.00
7/31/20	KAP	[REDACTED] worked on opposition to motion to change venue, telephone conference with Dorothy Timian Palmer, Steve Hartman and Greg Bushner [REDACTED] telephone conferences with Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dylan Frehner [REDACTED]	2.80	300.00	840.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 16,760.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Jennifer McMenomy	15.50	250.00	3,875.00
Karen A. Peterson	42.95	300.00	12,885.00
TOTALS	58.45		\$ 16,760.00

TOTAL THIS INVOICE \$ 16,760.00



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September 30, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 192775
Client No.: 08132
Matter No.: 52
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through September 29, 2020:

**RE: Vidler Water Company / LCWD/Vidler's Appeal of Judge Fairman's August 26, 2020
Order Granting Motion to Change Venue**

Professional Services Rendered	\$ 420.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 420.00

Invoice No.: 192775

September 30, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
9/15/20	KAP	Telephone conference [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] [REDACTED] [REDACTED] [REDACTED]	.40	300.00	120.00
9/16/20	KAP	Telephone conference with Steve Hartman [REDACTED] [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] [REDACTED] [REDACTED]	.80	300.00	240.00
9/22/20	KAP	Read Supreme Court order [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	.20	300.00	60.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 420.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	1.40	300.00	420.00
TOTALS	1.40		\$ 420.00

TOTAL THIS INVOICE \$ 420.00



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September 30, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 192777
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through September 29, 2020:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 54,222.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 54,222.50

Invoice No.: 192777

September 30, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/02/20	KAP	[REDACTED]	2.00	300.00	600.00
8/03/20	JMM	Draft Order [REDACTED]	.50	250.00	125.00
8/03/20	JMM	Telephone conference [REDACTED]	.40	250.00	100.00
8/03/20	KAP	Drafted [REDACTED]	9.00	300.00	2,700.00
8/04/20	JMM	Review [REDACTED]	.30	250.00	75.00
8/04/20	JMM	Draft Affidavits [REDACTED]	2.80	250.00	700.00
8/04/20	KAP	Drafted changes [REDACTED]	.50	300.00	150.00
8/04/20	DJ	Review meeting minutes and supporting materials; email Karen [REDACTED]	.75	250.00	187.50
8/05/20	JMM	Research [REDACTED] research [REDACTED]	3.50	250.00	875.00
8/05/20	KAP	Drafted affidavits [REDACTED] read Dylan Frehner [REDACTED]	4.00	300.00	1,200.00
8/05/20	DJ	Begin drafting memo [REDACTED]	3.10	250.00	775.00
8/06/20	JMM	Read and analyze [REDACTED] research [REDACTED] begin drafting [REDACTED]	4.10	250.00	1,025.00

Invoice No.: 192777

September 30, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/06/20	KAP	Drafted changes [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Dorothy Timian Palmer, Steve Hartman and Greg Bushner [REDACTED]	5.50	300.00	1,650.00
8/06/20	DJ	Complete memo [REDACTED]	1.20	250.00	300.00
8/07/20	JMM	Continue to draft [REDACTED]	12.00	250.00	3,000.00
8/07/20	DJ	Additional research [REDACTED]	1.00	250.00	250.00
8/09/20	KAP	Worked on opposition [REDACTED]	7.00	300.00	2,100.00
8/10/20	KAP	Worked on opposition [REDACTED] telephone conference with Dorothy Timian Palmer, telephone conference with Greg Bushner, telephone conference with Dylan Frehner [REDACTED]	7.50	300.00	2,250.00
8/10/20	DJ	Additional research [REDACTED]	2.10	250.00	525.00
8/11/20	JMM	Read and analyze [REDACTED] begin drafting Opposition [REDACTED]	2.50	250.00	625.00
8/11/20	KAP	[REDACTED]	2.00	300.00	600.00
8/12/20	JMM	Continue to Draft [REDACTED]	6.20	250.00	1,550.00
8/12/20	JMM	Read and analyze [REDACTED]	3.50	250.00	875.00

Invoice No.: 192777

September 30, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/12/20	KAP	Read Ryan Hoerth [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] [REDACTED]	2.00	300.00	600.00
8/13/20	JMM	Research [REDACTED] [REDACTED]	10.80	250.00	2,700.00
8/13/20	KAP	Read [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Greg Bushner and Ryan Hoerth [REDACTED] [REDACTED] email to Dylan Frehner [REDACTED] [REDACTED] telephone conference with Greg Bushner [REDACTED] [REDACTED]	5.60	300.00	1,680.00
8/14/20	JMM	Continue to draft and edit [REDACTED] [REDACTED]	7.50	250.00	1,875.00
8/14/20	KAP	Read [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED]	1.20	300.00	360.00
8/15/20	JMM	Draft, revise and edit [REDACTED] [REDACTED]	2.50	250.00	625.00
8/17/20	JMM	Read and analyze [REDACTED] [REDACTED] research [REDACTED] [REDACTED]	4.50	250.00	1,125.00

Invoice No.: 192777

September 30, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/17/20	KAP	Read [REDACTED] telephone conference with Wayne Klomp, [REDACTED]	4.75	300.00	1,425.00
8/18/20	JMM	Continue to draft [REDACTED]	8.00	250.00	2,000.00
8/18/20	KAP	Research [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	9.50	300.00	2,850.00
8/19/20	JMM	Continue to draft [REDACTED]	2.70	250.00	675.00
8/19/20	KAP	Read [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	3.00	300.00	900.00
8/20/20	KAP	Drafted [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Dylan Frehner [REDACTED] telephone conference with Dorothy Timian Palmer, [REDACTED]	9.25	300.00	2,775.00
8/21/20	JMM	Read and analyze [REDACTED] revise and edit [REDACTED]	3.50	250.00	875.00
8/21/20	KAP	Finalized [REDACTED]	2.50	300.00	750.00
8/22/20	KAP	Drafted revisions [REDACTED]	5.75	300.00	1,725.00

Invoice No.: 192777

September 30, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/23/20	KAP	Worked on revisions [REDACTED]	4.50	300.00	1,350.00
8/24/20	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer, Steve Hartman and Greg Bushner [REDACTED]	2.25	300.00	675.00
8/25/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	3.50	300.00	1,050.00
8/26/20	KAP	Worked on draft [REDACTED] read order [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman, [REDACTED]	7.75	300.00	2,325.00
8/27/20	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer, telephone conference with Lincoln/Vidler [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Dorothy Timian Palmer, [REDACTED]	5.75	300.00	1,725.00
8/28/20	KAP	[REDACTED] conference with Dorothy Timian Palmer and Steve Hartman, telephone conference with Dylan Frehner [REDACTED]	2.20	300.00	660.00
8/31/20	KAP	Read further emails [REDACTED]	.20	300.00	60.00

Invoice No.: 192777

September 30, 2020

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
9/01/20	KAP	Read letter from State Engineer [REDACTED] [REDACTED] telephone conference with Vidler [REDACTED] [REDACTED]	.75	300.00	225.00
9/02/20	KAP	Telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] [REDACTED]	.25	300.00	75.00
9/09/20	KAP	Read proposed letter to State Engineer [REDACTED] [REDACTED]	1.50	300.00	450.00
9/10/20	KAP	Read State Engineer non-opposition [REDACTED] [REDACTED]	.10	300.00	30.00
9/14/20	KAP	[REDACTED]	.30	300.00	90.00
9/15/20	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED]	.20	300.00	60.00
9/18/20	KAP	Telephone conversation with Dorothy Timian Palmer [REDACTED] [REDACTED] [REDACTED]	.40	300.00	120.00
9/22/20	KAP	Drafted request [REDACTED] [REDACTED]	.20	300.00	60.00
9/25/20	KAP	[REDACTED]	.10	300.00	30.00
9/28/20	KAP	[REDACTED]	.20	300.00	60.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 54,222.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Jennifer McMenemy	75.30	250.00	18,825.00

Invoice No.: 192777

September 30, 2020

Name	Hours	Rate	Total
Karen A. Peterson	111.20	300.00	33,360.00
Daniel Judd	8.15	250.00	2,037.50
TOTALS	194.65		\$ 54,222.50

TOTAL THIS INVOICE **\$ 54,222.50**



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AllisonMacKenzie.com

October 29, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 193277
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through September 30, 2020:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 60.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 60.00

Invoice No.: 193277

October 29, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
9/30/20	KAP	Read email [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] [REDACTED]	.20	300.00	60.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 60.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	.20	300.00	60.00
TOTALS	.20		\$ 60.00

TOTAL THIS INVOICE \$ 60.00



**ALLISON
MACKENZIE**

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AllisonMacKenzie.com

November 25, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 193598
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through October 31, 2020:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 435.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 435.00

Invoice No.: 193598

November 25, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
10/05/20	KAP	Read [REDACTED]	.20	300.00	60.00
10/08/20	KAP	Read all emails [REDACTED]	.30	300.00	90.00
10/13/20	KAP	Read [REDACTED] telephone conference with Dylan Frehner [REDACTED]	.50	300.00	150.00
10/14/20	KAP	Drafted notice of entry of order [REDACTED]	.25	300.00	75.00
10/30/20	KAP	Read letter [REDACTED]	.20	300.00	60.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 435.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	1.45	300.00	435.00
TOTALS	1.45		\$ 435.00

TOTAL THIS INVOICE \$ 435.00



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Phone 775.687.0202 · Fax 775.882.7918
AllisonMacKenzie.com

November 25, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 193601
Client No.: 08132
Matter No.: 52
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through October 31, 2020:

**RE: Vidler Water Company / LCWD/Vidler's Appeal of Judge Fairman's August 26, 2020
Order Granting Motion to Change Venue**

Professional Services Rendered	\$ 975.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 975.00

Invoice No.: 193601

November 25, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
10/01/20	KAP	Started draft [REDACTED]	.75	300.00	225.00
10/02/20	KAP	Revised [REDACTED]	1.50	300.00	450.00
10/05/20	KAP	Drafted changes [REDACTED]	.50	300.00	150.00
10/06/20	KAP	Finalized and filed [REDACTED]	.50	300.00	150.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 975.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	3.25	300.00	975.00
TOTALS	3.25		\$ 975.00

TOTAL THIS INVOICE \$ 975.00



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December 11, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 194086
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through November 30, 2020:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 720.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 720.00

Invoice No.: 194086

December 11, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
11/02/20	KAP	Read [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED] telephone call with Vidler, LCWD and John Lemaster [REDACTED]	1.00	300.00	300.00
11/03/20	KAP	[REDACTED]	.70	300.00	210.00
11/09/20	KAP	Read email [REDACTED]	.20	300.00	60.00
11/17/20	KAP	Read [REDACTED]	.50	300.00	150.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 720.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	2.40	300.00	720.00
TOTALS	2.40		\$ 720.00

TOTAL THIS INVOICE \$ 720.00



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December 16, 2020

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 194277
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through December 15, 2020:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 525.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 525.00

Invoice No.: 194277

December 16, 2020

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
12/09/20	KAP	Read email	1.75	300.00	525.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 525.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	1.75	300.00	525.00
TOTALS	1.75		\$ 525.00

TOTAL THIS INVOICE \$ 525.00



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February 25, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 195074
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through January 31, 2021:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 60.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 60.00

Invoice No.: 195074

February 25, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
1/29/21	KAP	Telephone conference with Greg Bushner [REDACTED]	.20	300.00	60.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 60.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	.20	300.00	60.00
TOTALS	.20		\$ 60.00

TOTAL THIS INVOICE \$ 60.00

March 30, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703Invoice No.: 195570
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP**INVOICE SUMMARY**

For professional services rendered and costs advanced through February 28, 2021:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 225.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 225.00

Invoice No.: 195570

March 30, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
2/24/21	KAP	Read email [redacted] telephone conference [redacted]	.50	300.00	150.00
		[redacted] telephone conference with Dorothy Timian Palmer and Steve Hartman [redacted]			
2/26/21	KAP	Read email [redacted]	.25	300.00	75.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 225.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	.75	300.00	225.00
TOTALS	.75		\$ 225.00

TOTAL THIS INVOICE \$ 225.00



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May 18, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 196620
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through April 30, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 1,935.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,935.00

Invoice No.: 196620

May 18, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
4/20/21	KAP	Telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED]	.25	300.00	75.00
4/26/21	KAP	[REDACTED]	1.00	300.00	300.00
4/27/21	KAP	Read all emails regarding status conference on Thursday, [REDACTED]	1.20	300.00	360.00
4/28/21	KAP	Call with Vidler and Lincoln [REDACTED] telephone conference with Dylan Frehner, [REDACTED]	1.50	300.00	450.00
4/29/21	KAP	Preparation for status check conference, attended status check conference, telephone conference with Dylan Frehner, telephone conference with Dorothy Timian Palmer and Steve Hartman	2.50	300.00	750.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 1,935.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	6.45	300.00	1,935.00
TOTALS	6.45		\$ 1,935.00

TOTAL THIS INVOICE \$ 1,935.00



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May 18, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 196622
Client No.: 08132
Matter No.: 52
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through April 30, 2021:

**RE: Vidler Water Company / LCWD/Vidler's Appeal of Judge Fairman's August 26, 2020
Order Granting Motion to Change Venue**

Professional Services Rendered	\$ 660.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 660.00

Invoice No.: 196622

May 18, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
4/15/21	KAP	Read venue decision from Supreme Court, telephone conference with Dorothy Timian Palmer	.70	300.00	210.00
4/19/21	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer, Steve Hartman, Greg Bushner, Ryan Hoerth, Dylan Frehner, Wade Poulsen, John Lemaster and Daniel Herder [REDACTED]	1.50	300.00	450.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 660.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	2.20	300.00	660.00
TOTALS	2.20		\$ 660.00

TOTAL THIS INVOICE \$ 660.00



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June 30, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 197438
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through June 30, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 12,030.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 12,030.00

Invoice No.: 197438

June 30, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
5/17/21	KAP	[REDACTED] telephone conference with Steve Hartman [REDACTED]	1.00	300.00	300.00
5/18/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.30	300.00	90.00
5/19/21	KAP	Reviewed 8th JD file, reviewed docket sheet [REDACTED]	4.50	300.00	1,350.00
5/20/21	KAP	Worked on stipulation, [REDACTED]	4.50	300.00	1,350.00
5/21/21	KAP	Telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED]	.40	300.00	120.00
5/24/21	KAP	[REDACTED]	1.75	300.00	525.00
5/26/21	KAP	Read email [REDACTED] telephone conference with Vidler/Lincoln County [REDACTED] telephone conference with Wayne Klomp and John Lemaster [REDACTED] read stipulation in consolidated cases, [REDACTED]	2.00	300.00	600.00
5/27/21	KAP	Prepared for status check, [REDACTED] met with Vidler (Steve Hartman, Greg Bushner and Ryan Hoerth), attended status conference, conference with Dorothy Timian Palmer and John Lemaster [REDACTED]	5.75	300.00	1,725.00
6/04/21	KAP	Read court minutes, [REDACTED]	.25	300.00	75.00
6/07/21	KAP	[REDACTED]	.20	300.00	60.00

Invoice No.: 197438

June 30, 2021

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/08/21	KAP	[REDACTED] email to Dorothy Timian Palmer and Steve Hartman [REDACTED]	.20	300.00	60.00
6/10/21	KAP	Read Church's notice of intervention filing, [REDACTED]	.25	300.00	75.00
6/11/21	KAP	Email to Vidler [REDACTED] email to Dylan Frehner and Wayne Klomp [REDACTED] reviewed joint notice of submitted motions to intervene, [REDACTED]	3.00	300.00	900.00
6/14/21	KAP	Read email [REDACTED]	1.20	300.00	360.00
6/15/21	KAP	Emails [REDACTED] email to Dorothy Timian Palmer and Steve Hartman [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	1.50	300.00	450.00
6/16/21	KAP	Telephone conference [REDACTED]	.70	300.00	210.00

Invoice No.: 197438

June 30, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
6/17/21	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	2.00	300.00	600.00
6/18/21	KAP	[REDACTED]	1.50	300.00	450.00
6/21/21	KAP	Telephone conference [REDACTED] [REDACTED]	.75	300.00	225.00
6/22/21	KAP	Telephone conference [REDACTED] reviewed court minutes, [REDACTED] [REDACTED]	1.00	300.00	300.00
6/23/21	KAP	[REDACTED]	.30	300.00	90.00
6/24/21	KAP	[REDACTED]	3.25	300.00	975.00
6/25/21	KAP	Drafted notices of entry of orders [REDACTED] [REDACTED]	1.10	300.00	330.00

Invoice No.: 197438

June 30, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
6/28/21	KAP	Read email [REDACTED]	1.20	300.00	360.00
6/29/21	KAP	[REDACTED]	1.50	300.00	450.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 12,030.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	40.10	300.00	12,030.00
TOTALS	40.10		\$ 12,030.00

TOTAL THIS INVOICE \$ 12,030.00



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July 29, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 197768
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through June 30, 2021:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 420.00
Total Costs Advanced	<u>\$ 462.95</u>
TOTAL THIS INVOICE	\$ 882.95

Invoice No.: 197768

July 29, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
6/30/21	KAP	Email [redacted] telephone conference	1.40	300.00	420.00
		[redacted] telephone conference with Dorothy Timian Palmer			

TOTAL PROFESSIONAL SERVICES RENDERED \$ 420.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	1.40	300.00	420.00
TOTALS	1.40		\$ 420.00

COSTS ADVANCED

Description	Amount
[redacted]	
6/25/21 Miscellaneous Service Fees	3.50
6/25/21 Miscellaneous Service Fees	3.50
6/25/21 Miscellaneous Service Fees	3.50
6/25/21 Miscellaneous Service Fees	3.50
TOTAL COSTS ADVANCED	\$ 462.95
TOTAL THIS INVOICE	\$ 882.95



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August 25, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 198268
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through July 31, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 10,975.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 10,975.00

Invoice No.: 198268

August 25, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
7/01/21	KAP	Read [REDACTED] met with Dorothy Timian Palmer, Steve Hartman and Greg Bushner, court hearing, met with Dorothy Timian Palmer, Steve Hartman and Greg Bushner	5.75	300.00	1,725.00
7/02/21	KAP	Telephone conference with Dorothy Timian Palmer, [REDACTED] sent email to Dorothy Timian Palmer [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.75	300.00	225.00
7/06/21	KAP	Read Order 1309, [REDACTED]	3.25	300.00	975.00
7/07/21	KAP	[REDACTED]	1.25	300.00	375.00
7/08/21	KAP	[REDACTED]	13.50	300.00	4,050.00
7/09/21	KAP	Read [REDACTED]	3.00	300.00	900.00
7/13/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
7/15/21	KAP	Met at Vidler with Steve Hartman, Greg Bushner and Ryan Hoerth, [REDACTED]	.25	300.00	75.00
7/17/21	KAP	Worked on [REDACTED]	4.50	300.00	1,350.00
7/18/21	KAP	Revised [REDACTED]	.75	300.00	225.00

Invoice No.: 198268

August 25, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
7/19/21	KAP	Telephone conference with Dorothy Timian Palmer, Steve Hartman, Greg Bushner, Ryan Hoerth, John Lemaster, David Herder and Wayne Klomp [REDACTED]	.75	300.00	225.00
7/23/21	EM	[REDACTED]	1.00	250.00	250.00
7/23/21	KAP	[REDACTED]	.75	300.00	225.00
7/26/21	KAP	Email to Dorothy Timian Palmer and Steve Hartman [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
7/29/21	KAP	Met with Dorothy Timian Palmer and LeAnn Brandt [REDACTED]	.75	300.00	225.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 10,975.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	35.75	300.00	10,725.00
Emily Meibert	1.00	250.00	250.00
TOTALS	36.75		\$ 10,975.00

TOTAL THIS INVOICE \$ 10,975.00



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September 27, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 199033
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through August 31, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 33,870.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 33,870.00

Invoice No.: 199033

September 27, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/02/21	EM	Review [REDACTED]	2.50	250.00	625.00
8/03/21	EM	Review [REDACTED] Legal Research for Brief	6.00	250.00	1,500.00
8/04/21	EM	Continued [REDACTED]	6.00	250.00	1,500.00
8/04/21	KAP	Started [REDACTED]	1.50	300.00	450.00
8/09/21	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer, [REDACTED]	1.00	300.00	300.00
8/10/21	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	1.00	300.00	300.00
8/11/21	EM	Attention to [REDACTED]	4.50	250.00	1,125.00
8/11/21	KAP	[REDACTED] worked on draft of brief - [REDACTED]	2.25	300.00	675.00
8/12/21	EM	Legal Research	.50	250.00	125.00
8/12/21	KAP	Worked on [REDACTED]	2.00	300.00	600.00
8/13/21	EM	Discuss [REDACTED]	6.80	250.00	1,700.00
8/13/21	KAP	Telephone conference with Dorothy Timian Palmer and Greg Bushner [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.70	300.00	210.00
8/14/21	KAP	Worked on [REDACTED]	3.00	300.00	900.00
8/15/21	KAP	Worked on [REDACTED]	4.00	300.00	1,200.00
8/16/21	EM	Legal Research [REDACTED]	2.00	250.00	500.00
8/16/21	KAP	Worked on [REDACTED]	6.00	300.00	1,800.00
8/17/21	EM	Legal Research; [REDACTED]	3.50	250.00	875.00

Invoice No.: 199033

September 27, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
8/17/21	KAP	[REDACTED]	.25	300.00	75.00
8/18/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED]	2.20	300.00	660.00
8/19/21	KAP	[REDACTED]	5.00	300.00	1,500.00
8/20/21	KAP	Worked on [REDACTED] meeting at Vidler [REDACTED] [REDACTED]	3.75	300.00	1,125.00
8/21/21	KAP	Worked on [REDACTED]	6.00	300.00	1,800.00
8/22/21	KAP	Worked on [REDACTED]	9.50	300.00	2,850.00
8/24/21	KAP	Worked on [REDACTED]	6.00	300.00	1,800.00
8/25/21	KAP	Worked on [REDACTED] telephone conference with Dorothy Timian Palmer, telephone conference with Wayne Klomp, telephone conference with Greg Bushner and Ryan Hoerth	7.50	300.00	2,250.00
8/26/21	KAP	Telephone conferences with Dorothy Timian Palmer regarding [REDACTED] [REDACTED]	11.00	300.00	3,300.00
8/27/21	KAP	Worked on [REDACTED] [REDACTED]	13.75	300.00	4,125.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 33,870.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	86.40	300.00	25,920.00
Emily Meibert	31.80	250.00	7,950.00
TOTALS	118.20		\$ 33,870.00

TOTAL THIS INVOICE \$ 33,870.00



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September 29, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 199039
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through September 29, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 4,560.00
Total Costs Advanced	<u>\$ 144.68</u>
TOTAL THIS INVOICE	\$ 4,704.68

Invoice No.: 199039

September 29, 2021

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/01/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
9/03/21	KAP	Met with Vidler [REDACTED]	1.75	300.00	525.00
9/07/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] email to Dylan Frehner and Wayne Klomp, drafted order granting motion to exceed word count, [REDACTED]	1.75	300.00	525.00
9/08/21	KAP	Started reading [REDACTED] telephone conference with Dorothy Timian Palmer, [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	4.75	300.00	1,425.00
9/09/21	KAP	Read [REDACTED] attended status check court hearing with Steve Hartman, drafted order for intervention [REDACTED] read [REDACTED] [REDACTED] email to Lincoln and Vidler [REDACTED] [REDACTED] telephone conference with Wayne Klomp [REDACTED]	4.25	300.00	1,275.00
9/10/21	KAP	Telephone conference [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.75	300.00	225.00
9/13/21	KAP	Read [REDACTED] finalized order for intervention and sent to court for filing, read [REDACTED]	1.00	300.00	300.00

Invoice No.: 199039

September 29, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
9/20/21	KAP	Telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED]	.20	300.00	60.00
9/21/21	KAP	Went over ROA cite check [REDACTED]	.30	300.00	90.00
9/22/21	KAP	Read [REDACTED] [REDACTED]	.20	300.00	60.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 4,560.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	15.20	300.00	4,560.00
TOTALS	15.20		\$ 4,560.00

COSTS ADVANCED

Description	Amount
9/07/21 Online filing fee - 06/29/2021.	7.00
9/07/21 Online filing fee - 07/01/2021.	10.50
9/13/21 Federal Express delivery to Clark County District Court.	127.18
TOTAL COSTS ADVANCED	\$ 144.68
TOTAL THIS INVOICE	\$ 4,704.68



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November 30, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 200106
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through October 31, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 4,380.00
Total Costs Advanced	<u>\$ 31.50</u>
TOTAL THIS INVOICE	\$ 4,411.50

Invoice No.: 200106

November 30, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
10/04/21	KAP	Email to Wayne Klomp, conference with Vidler [REDACTED]	.50	300.00	150.00
10/05/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
10/06/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
10/08/21	KAP	Read emails from Dorothy Timian Palmer [REDACTED]	.10	300.00	30.00
10/09/21	KAP	Read [REDACTED]	1.00	300.00	300.00
10/11/21	KAP	Meeting at Vidler [REDACTED]	2.25	300.00	675.00
10/13/21	KAP	Read [REDACTED]	.20	300.00	60.00
10/15/21	KAP	Read [REDACTED] telephone conference Wayne Klomp, read [REDACTED] telephone conference with Lincoln and Vidler [REDACTED]	5.25	300.00	1,575.00
10/18/21	KAP	Reviewed [REDACTED] reviewed [REDACTED]	.30	300.00	90.00
10/19/21	KAP	Meeting at Vidler with Dorothy Timian Palmer, Steve Hartman, Greg Bushner and Ryan Hoerth [REDACTED]	1.50	300.00	450.00
10/28/21	KAP	Read [REDACTED]	1.00	300.00	300.00
10/29/21	KAP	[REDACTED]	2.00	300.00	600.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 4,380.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	14.60	300.00	4,380.00
TOTALS	14.60		\$ 4,380.00

Invoice No.: 200106

November 30, 2021

COSTS ADVANCED

Description	Amount
10/25/21 Heritage Bank of Nevada, On-line Filing Fees.	31.50
TOTAL COSTS ADVANCED	\$ 31.50
TOTAL THIS INVOICE	\$ 4,411.50



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December 28, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 200669
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through November 30, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 14,715.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 14,715.00

Invoice No.: 200669

December 28, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
11/01/21	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer, Steve Hartman, Greg Bushner and Ryan Hoerth [REDACTED]	2.50	300.00	750.00
11/08/21	KAP	[REDACTED]	2.25	300.00	675.00
11/09/21	KAP	[REDACTED]	6.75	300.00	2,025.00
11/11/21	KAP	Started [REDACTED]	2.50	300.00	750.00
11/13/21	KAP	Worked on [REDACTED]	2.25	300.00	675.00
11/14/21	KAP	Worked on [REDACTED]	4.00	300.00	1,200.00
11/15/21	KAP	Worked on [REDACTED]	5.50	300.00	1,650.00
11/16/21	KAP	Worked on [REDACTED]	1.50	300.00	450.00
11/18/21	KAP	Worked on [REDACTED]	3.00	300.00	900.00
11/19/21	KAP	Worked on [REDACTED]	3.25	300.00	975.00
11/21/21	KAP	Read [REDACTED]	2.25	300.00	675.00
11/22/21	KAP	Telephone conference with Wayne Klomp [REDACTED] telephone conference with Dorothy Timian Palmer and Steve Hartman regarding [REDACTED]	.50	300.00	150.00
11/23/21	KAP	Worked on [REDACTED]	2.00	300.00	600.00
11/24/21	KAP	[REDACTED] telephone conference with Steve Hartman, telephone conference with Greg Bushner, telephone conferences with Dorothy Timian Palmer, [REDACTED]	9.75	300.00	2,925.00

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Invoice No.: 200669

December 28, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
11/29/21	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] email to Vidler and Lincoln [REDACTED] [REDACTED]	.30	300.00	90.00
11/30/21	KAP	[REDACTED]	.75	300.00	225.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 14,715.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	49.05	300.00	14,715.00
TOTALS	49.05		\$ 14,715.00

TOTAL THIS INVOICE **\$ 14,715.00**



**ALLISON
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December 30, 2021

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 200964
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through December 30, 2021:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 8,850.00
Total Costs Advanced	<u>\$ 49.86</u>
TOTAL THIS INVOICE	\$ 8,899.86

Invoice No.: 200964

December 30, 2021

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
12/05/21	KAP	Email to 1309 attorney group regarding is status conference for tomorrow on Judge's calendar. [REDACTED]	.25	300.00	75.00
12/06/21	KAP	Read all emails regarding status conference today, email to Judge's law clerk for status conference call in information, met with Greg Bushner and Ryan Hoerth. attended status conference, telephone conference with Dorothy Timian Palmer and Steve Hartman [REDACTED]	4.20	300.00	1,260.00
12/07/21	KAP	Telephone conference [REDACTED]	.20	300.00	60.00
12/09/21	KAP	[REDACTED]	1.00	300.00	300.00
12/13/21	KAP	Read [REDACTED]	.30	300.00	90.00
12/14/21	KAP	Read [REDACTED]	1.10	300.00	330.00
12/15/21	KAP	[REDACTED]	.10	300.00	30.00
12/16/21	KAP	Read [REDACTED] [REDACTED] telephone conference with Wayne Klomp, meeting at Vidler [REDACTED]	7.75	300.00	2,325.00
12/20/21	KAP	Finished reading [REDACTED] [REDACTED] telephone conference with Greg Bushner [REDACTED]	5.10	300.00	1,530.00
12/21/21	KAP	Worked on [REDACTED]	2.00	300.00	600.00

ALLISON MACKENZIE, LTD.

Invoice No.: 200964

December 30, 2021

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
12/22/21	KAP	Read [REDACTED] telephone conference with Wayne Klomp, read Greg Bushner [REDACTED]	3.00	300.00	900.00
12/23/21	KAP	Worked on [REDACTED]	1.00	300.00	300.00
12/28/21	KAP	Continued [REDACTED]	2.00	300.00	600.00
12/29/21	KAP	Worked on [REDACTED]	1.50	300.00	450.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 8,850.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	29.50	300.00	8,850.00
TOTALS	29.50		\$ 8,850.00

COSTS ADVANCED

Date	Description	Amount
12/09/21	Filing fees.	17.50
12/16/21	Federal Express delivery to Clark County District Court.	32.36
TOTAL COSTS ADVANCED		\$ 49.86
TOTAL THIS INVOICE		\$ 8,899.86



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January 28, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 201233
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through December 31, 2021:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 600.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 600.00

Invoice No.: 201233

January 28, 2022

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
12/29/21	KAP	Worked on [REDACTED]	1.50	300.00	450.00
12/31/21	KAP	[REDACTED] telephone conference with Wayne Klomp [REDACTED]	.50	300.00	150.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 600.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	2.00	300.00	600.00
TOTALS	2.00		\$ 600.00

TOTAL THIS INVOICE \$ 600.00



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February 28, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 201762
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through January 31, 2022:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 21,450.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 21,450.00

Invoice No.: 201762

February 28, 2022

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
1/03/22	KAP	Worked on draft [REDACTED]	4.50	300.00	1,350.00
1/04/22	KAP	Worked on draft [REDACTED]	2.25	300.00	675.00
1/05/22	KAP	Read [REDACTED] worked on draft of [REDACTED]	3.25	300.00	975.00
1/06/22	KAP	Worked on draft [REDACTED]	4.50	300.00	1,350.00
1/07/22	KAP	Worked on draft [REDACTED] read Wayne Klomp draft, telephone conference with Wayne Klomp [REDACTED] telephone conference with Dorothy Timian Palmer, [REDACTED]	8.25	300.00	2,475.00
1/08/22	KAP	Worked on [REDACTED] telephone conference with Dorothy Timian Palmer, Ryan Hoerth and Greg Bushner [REDACTED]	8.50	300.00	2,550.00
1/09/22	KAP	Worked on reply brief, research [REDACTED] telephone conference with Dorothy Timian Palmer and Greg Bushner [REDACTED] worked on draft [REDACTED]	7.25	300.00	2,175.00
1/10/22	KAP	Worked on draft [REDACTED] telephone conference with Wayne Klomp [REDACTED] reading Wayne Klomp [REDACTED] telephone conference with Steve Hartman, email to everyone [REDACTED] telephone conference with Greg Bushner [REDACTED] telephone conference with Greg Bushner and Ryan Hoerth, [REDACTED] telephone conference with Wayne Klomp [REDACTED]	12.50	300.00	3,750.00
1/11/22	KAP	Reviewed [REDACTED] telephone conference with Dorothy Timian Palmer, Greg Bushner and Ryan Hoerth, [REDACTED]	6.00	300.00	1,800.00

Invoice No.: 201762

February 28, 2022

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
1/17/22	KAP	Read email from Dorothy Timian Palmer [REDACTED] [REDACTED] telephone conference with Dorothy Timian Palmer, Greg Bushner and Ryan Hoerth [REDACTED]	.50	300.00	150.00
1/19/22	KAP	[REDACTED]	1.50	300.00	450.00
1/20/22	KAP	Prepared for status conference, [REDACTED]	2.50	300.00	750.00
1/21/22	KAP	Telephone conference with Greg Bushner and Ryan Hoerth [REDACTED]	1.25	300.00	375.00
1/24/22	KAP	Telephone conference with Wayne Klomp and Greg Bushner [REDACTED]	1.50	300.00	450.00
1/25/22	KAP	[REDACTED]	.75	300.00	225.00
1/26/22	KAP	Read [REDACTED]	3.25	300.00	975.00
1/27/22	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] [REDACTED] read John Lemaster comments [REDACTED]	3.25	300.00	975.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 21,450.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	71.50	300.00	21,450.00
TOTALS	71.50		\$ 21,450.00

TOTAL THIS INVOICE \$ 21,450.00



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March 28, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 202686
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through February 28, 2022:

RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln County District Court

Professional Services Rendered	\$ 25,245.00
Total Costs Advanced	<u>\$ 242.63</u>
TOTAL THIS INVOICE	\$ 25,487.63

Invoice No.: 202686

March 28, 2022

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Atty</u>	<u>Description of Services Rendered</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/07/22	KAP	[REDACTED]	1.50	300.00	450.00
2/08/22	KAP	Zoom meeting with Dylan Frehner, Wayne Klomp, Greg Bushner and Ryan Hoerth [REDACTED]	2.00	300.00	600.00
2/09/22	KAP	Read [REDACTED] telephone conference [REDACTED]	2.60	300.00	780.00
2/10/22	KAP	Read [REDACTED] emails from Greg Bushner and Ryan Hoerth [REDACTED]	7.00	300.00	2,100.00
2/11/22	KAP	Telephone conference with Dorothy Timian Palmer regarding [REDACTED]	.25	300.00	75.00
2/12/22	KAP	Read email [REDACTED] telephone conference [REDACTED], telephone conference with Dorothy Timian Palmer, [REDACTED]	5.50	300.00	1,650.00
2/13/22	KAP	Traveled to Las Vegas, [REDACTED]	6.75	300.00	2,025.00
2/14/22	KAP	[REDACTED] attended hearing	12.75	300.00	3,825.00
2/15/22	KAP	[REDACTED] attended hearing, [REDACTED]	13.25	300.00	3,975.00
2/16/22	KAP	[REDACTED] attended hearing, [REDACTED]	17.25	300.00	5,175.00
2/17/22	KAP	[REDACTED] attended hearing	9.75	300.00	2,925.00
2/18/22	KAP	Traveled back from Las Vegas to Carson City	4.00	300.00	1,200.00
2/22/22	KAP	Email to all attorneys of record [REDACTED]	.60	300.00	180.00
2/25/22	KAP	Read [REDACTED] read [REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]	.25	300.00	75.00
2/28/22	KAP	Read [REDACTED]	.70	300.00	210.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 25,245.00

Invoice No.: 202686

March 28, 2022

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	84.15	300.00	25,245.00
TOTALS	84.15		\$ 25,245.00

COSTS ADVANCED

Description	Amount
2/07/22 Federal Express - Delivery to Clark County District Court.	144.16
2/28/22 Federal Express delivery of documents from Las Vegas to Allison MacKenzie	80.97
2/28/22 Nevada E-file- E-filing fee for the 8th JD court case.	17.50
TOTAL COSTS ADVANCED	\$ 242.63
TOTAL THIS INVOICE	\$ 25,487.63



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March 29, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 202942
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through March 29, 2022:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 1,635.00
Total Costs Advanced	<u>\$ 351.91</u>
TOTAL THIS INVOICE	\$ 1,986.91

Invoice No.: 202942

March 29, 2022

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
3/01/22	KAP	Read [REDACTED]	1.00	300.00	300.00
3/02/22	KAP	[REDACTED]	.25	300.00	75.00
3/10/22	KAP	Read [REDACTED] call with Lincoln and Vidler	2.00	300.00	600.00
3/16/22	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer	.25	300.00	75.00
3/18/22	KAP	Discussed [REDACTED]	.75	300.00	225.00
3/19/22	KAP	Revisions to [REDACTED]	.50	300.00	150.00
3/21/22	KAP	[REDACTED]	.20	300.00	60.00
3/23/22	KAP	Finalized [REDACTED]	.20	300.00	60.00
3/28/22	KAP	[REDACTED]	.30	300.00	90.00

TOTAL PROFESSIONAL SERVICES RENDERED \$ 1,635.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	5.45	300.00	1,635.00
TOTALS	5.45		\$ 1,635.00

COSTS ADVANCED

Description	Amount
3/04/22 Federal Express- Delivery of documents to Las Vegas.	230.90
3/20/22 Southwest Airlines	113.01
3/20/22 Nevada District Court- Fee for transcript.	8.00
TOTAL COSTS ADVANCED	\$ 351.91

Invoice No.: 202942

March 29, 2022

TOTAL THIS INVOICE

\$ 1,986.91



**ALLISON
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April 27, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 203270
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through March 31, 2022:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 525.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 525.00

Invoice No.: 203270

April 27, 2022

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
3/29/22	KAP	[REDACTED]	.25	300.00	75.00
3/30/22	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED]	.20	300.00	60.00
3/31/22	KAP	Reviewed Dorothy Timian Palmer email [REDACTED]	1.30	300.00	390.00
		[REDACTED] telephone conference with Ryan Hoerth [REDACTED]			
		[REDACTED] telephone conference with Dorothy Timian Palmer [REDACTED]			

TOTAL PROFESSIONAL SERVICES RENDERED \$ 525.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	1.75	300.00	525.00
TOTALS	1.75		\$ 525.00

TOTAL THIS INVOICE \$ 525.00



**ALLISON
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May 10, 2022

Vidler Water Company
3480 GS Richards Boulevard, Suite 101
Carson City, NV 89703

Invoice No.: 204385
Client No.: 08132
Matter No.: 49
Responsible Atty: KAP

INVOICE SUMMARY

For professional services rendered and costs advanced through April 30, 2022:

**RE: LCWD-Vidler Petition for Judicial Review of State Engineer Order 1309; Lincoln
County District Court**

Professional Services Rendered	\$ 1,785.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,785.00

Invoice No.: 204385

May 10, 2022

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description of Services Rendered	Hours	Rate	Amount
4/05/22	KAP	Read email from Ryan Hoerth [REDACTED]	.20	300.00	60.00
4/06/22	KAP	[REDACTED] telephone conference with Ryan Hoerth and Greg Bushner	.50	300.00	150.00
4/19/22	KAP	[REDACTED]	1.00	300.00	300.00
4/20/22	KAP	[REDACTED] telephone conference with Dorothy Timian Palmer research [REDACTED]	2.00	300.00	600.00
4/21/22	KAP	Telephone conference with Dorothy Timian Palmer [REDACTED] email to Dorothy Timian Palmer [REDACTED]	1.25	300.00	375.00
4/26/22	KAP	Telephone conference with John Lemaster, Dylan Frehner, Wayne Klomp, Wade Poulsen, Daniel Herder, Greg Bushner and Ryan Hoerth	1.00	300.00	300.00
TOTAL PROFESSIONAL SERVICES RENDERED					\$ 1,785.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Karen A. Peterson	5.95	300.00	1,785.00
TOTALS	5.95		\$ 1,785.00
TOTAL THIS INVOICE			\$ 1,785.00

EXHIBIT “5”

Invoice

INVOICE TOTAL: [REDACTED]

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Summary

[REDACTED] [REDACTED]
Petition for Judicial Review Matter 22.9 hours
[REDACTED] [REDACTED]

Date	Task	Task	Matter	Time
1-Jul-21	Review and analyze pending motions for intervention by LVVWD, SNWA, and MVIC [REDACTED]	Contract Time	Petition	2.1
1-Jul-21	Telephone call with District Attorney re [REDACTED]	Contract Time	Petition	0.4
1-Jul-21	Final preparations for status conference, [REDACTED]	Contract Time	Petition	0.8
1-Jul-21	Attend status hearing on petition for judicial review.	Contract Time	Petition	1.8
1-Jul-21	Telephone call with District Attorney re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6-Jul-21	Telephone call and email correspondence with DA and Vidler counsel re [REDACTED] [REDACTED]	Contract Time	Petition	0.6
7-Jul-21	Travel to Las Vegas for [REDACTED] [REDACTED]	Contract Time	Petition [REDACTED]	2.6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7-Jul-21	Prepare for meeting [REDACTED] [REDACTED]	Contract Time	Petition	1.5

Date	Task	Task	Matter	Time
7-Jul-21	Correspondence with counsel re [REDACTED]	Contract Time	Petition	0.4
7-Jul-21	Review and analyze [REDACTED]	Contract Time	Petition	0.5
7-Jul-21	Attend conference call with Vidler and all counsel re [REDACTED].	Contract Time	Petition [REDACTED]	0.8
7-Jul-21	Conference call with W. Poulson & D. Frehner re [REDACTED]	Contract Time	Petition	0.4
8-Jul-21	[REDACTED]	Contract Time	Petition	5.6
8-Jul-21	Correspondence with opposing counsel re proposed order.	Contract Time	Petition	0.3
8-Jul-21	Review and analyze proposed order granting SNWA and MVIC motions for interventions and correspondence with opposing counsel re same.	Contract Time	Petition	0.5
9-Jul-21	Return travel from Las Vegas from [REDACTED].	Contract Time	Petition	2.5
9-Jul-21	Correspondence with SNWA and MVIC counsel re proposed order on intervention, [REDACTED], and conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.6
12-Jul-21	Review [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16-Jul-21	Correspondence with all counsel re [REDACTED]	Contract Time	Petition	0.3
19-Jul-21	Review and analyze [REDACTED]	Contract Time	Petition	0.6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task	Matter	Time
19-Jul-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19-Jul-21	Conference with all counsel [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19-Jul-21	Correspondence with K. Peterson re [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
23-Jul-21	Review and analyze CSI timeline of events and draft outline of opening brief.	Contract Time	Petition	0.6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Total Hours	48.7
Contract Time	38.7
Uncharged Time	10

[REDACTED]	[REDACTED]
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INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] \$200 per hour)

Invoice – No. 2021-08

INVOICE TOTAL: ██████████

Bill To:

Lincoln County Water District
 c/o Wade Poulsen
 1005 Main Street
 Panaca, Nevada 89042
wpoulsen@lincolnnv.com

Remit Payment To:

Wayne Klomp
 1783 Trek Trail
 Reno, Nevada 89521
 (775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

██████████	████
Petition for Judicial Review Matter	31.7
██████████	████
██████████	████
Total August	████
██████████	████
██████████	████

Date	Task	Task Type	Matter	Time
3-Aug-21	Analyze recent filings from intervenor's counsel.	Contract Time	Petition	0.3
5-Aug-21	Telephone calls with W. Poulson re ██████████	Contract Time	Petition	0.3
5-Aug-21	Review and analyze ██████████	Contract Time	Petition	0.8
5-Aug-21	Review and analyze ██████████	Contract Time	Petition	0.5
11-Aug-21	Draft and revise ██████████	Contract time	Petition	0.5
██████████	██████████	██████████	██████████	████
11-Aug-21	Correspondence with client re ██████████	Contract Time	Petition	0.3
██████████	██████████	██████████	██████████	████

Date	Task	Task Type	Matter	Time
11-Aug-21	Correspondence and telephone conference with former counsel re [REDACTED]	Contract Time	Petition	0.3
11-Aug-21	Telephone conference with District Attorney re [REDACTED]	Contract Time	Petition	0.4
11-Aug-21	Finalize and file substitution of counsel.	Contract Time	Petition	0.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11-Aug-21	Correspondence with K. Peterson and group re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17-Aug-21	Begin revising and editing draft [REDACTED]	Contract Time	Petition	0.7
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19-Aug-21	Revise and edit draft [REDACTED]	Contract Time	Petition	2.5

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
20-Aug-21	Conference call with Vidler re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
23-Aug-21	Revise and edit draft [REDACTED]	Contract Time	Petition	5.6
24-Aug-21	Revise and edit draft [REDACTED]	Contract Time	Petition	0.6
24-Aug-21	Correspondence with all counsel [REDACTED]	Contract Time	Petition	0.3
24-Aug-21	Review and analyze revised draft and comments [REDACTED]	Contract Time	Petition	0.6
24-Aug-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
25-Aug-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.4
25-Aug-21	Begin researching case law on [REDACTED]	Contract Time	Petition	4.8

Date	Task	Task Type	Matter	Time
26-Aug-21	Continue research on [REDACTED]	Contract Time	Petition	3.4
26-Aug-21	Draft additional sections of [REDACTED]	Contract Time	Petition	3.3
26-Aug-21	Communications with K. Peterson and D. Frehner re [REDACTED]	Contract Time	Petition	1.1
27-Aug-21	Continue revising and edit [REDACTED]	Contract Time	Petition	2.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Hours				56.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] at \$200 per hour)

Invoice – No. 2021-09

INVOICE TOTAL: [REDACTED]

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	22.8
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3-Sep-21	Continue analyzing [REDACTED] and drafting [REDACTED]	Contract Time	Petition	2.4
7-Sep-21	Review and analyze [REDACTED]	Contract Time	Petition	2.8
7-Sep-21	Continue drafting [REDACTED]	Contract Time	Petition	1.3
7-Sep-21	Correspondence with K. Peterson re [REDACTED]	Contract Time	Petition	0.3
7-Sep-21	Review and analyze draft [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8-Sep-21	Review and analyze court documents re [REDACTED]	Contract Time	Petition	0.4
8-Sep-21	Review and analyze issues for [REDACTED]	Contract Time	Petition	1.1
9-Sep-21	Telephone conferences with K. Peterson and D. Frehner re [REDACTED]	Contract Time	Petition	0.8

Date	Task	Task Type	Matter	Time
9-Sep-21	Final preparation for status hearing on petition, [REDACTED]	Contract Time	Petition	0.4
9-Sep-21	Attend status hearing [REDACTED]	Contract Time	Petition	0.9
9-Sep-21	Review and analyze [REDACTED]	Contract Time	Petition	0.5
9-Sep-21	Review and analyze [REDACTED]	Contract Time	Petition	0.3
9-Sep-21	Correspondence with Vidler and counsel re [REDACTED]	Contract Time	Petition	0.4
10-Sep-21	Review [REDACTED]	Contract Time	Petition	0.6
10-Sep-21	Review and analyze opening briefs [REDACTED]	Contract Time	Petition	4.5
11-Sep-21	Review CSI opening brief and glossary [REDACTED]	Contract Time	Petition	1.7
11-Sep-21	Review and analyze [REDACTED]	Contract Time	Petition	1.6
13-Sep-21	Correspondence with counsel re [REDACTED]	Contract Time	Petition	0.5
13-Sep-21	Review [REDACTED]	Contract Time	Petition	0.4
15-Sep-21	Analyze [REDACTED]	Contract Time	Petition	0.3
15-Sep-21	Review [REDACTED]	Contract Time	Petition	0.4

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17-Sep-21	Review and analyze [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
22-Sep-21	Review [REDACTED]	Contract Time	Petition	0.6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Invoice – No. 2021-10

INVOICE TOTAL: [REDACTED]

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	21.4
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task Type	Matter	Time
12-Oct-21	Revie and analyze [REDACTED]	Contract Time	Petition	0.5
12-Oct-21	Continue reviewing [REDACTED]	Contract Time	Petition	1.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13-Oct-21	Review and analyze [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14-Oct-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14-Oct-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.6
15-Oct-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.4
15-Oct-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.3
15-Oct-21	Telephone conference with client, [REDACTED]	Contract Time	Petition	0.9
15-Oct-21	Review and analyze [REDACTED]	Contract Time	Petition	0.4

Date	Task	Task Type	Matter	Time
18-Oct-21	Review and analyze [REDACTED]	Contract Time	Petition	1.9
20-Oct-21	Review and analyze [REDACTED]	Contract Time	Petition	0.9
21-Oct-21	Begin outlining arguments [REDACTED]	Contract Time	Petition	2.1
25-Oct-21	Review and analyze factual assertions and ROA [REDACTED]	Contract Time	Petition	3.7
26-Oct-21	Research case law re [REDACTED]	Contract Time	Petition	3.5
28-Oct-21	Continue drafting [REDACTED]	Contract Time	Petition	2.8
28-Oct-21	Review and analyze [REDACTED]	Contract Time	Petition	1.2

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] at \$200 per hour)

Invoice – No. 2021-11

INVOICE TOTAL: [REDACTED]

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnnv.com

Remit Payment To:

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(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	48.1
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
1-Nov-21	Telephone conference with [REDACTED]	Contract Time	Petition	1.0
1-Nov-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.5
1-Nov-21	Review and analyze [REDACTED]	Contract Time	Petition	0.7
2-Nov-21	Begin outlining [REDACTED]	Contract Time	Petition	0.7
5-Nov-21	Continue drafting [REDACTED]	Contract Time	Petition	0.6
8-Nov-21	Research and analyze [REDACTED]	Contract Time	Petition	5.5

Date	Task	Task Type	Matter	Time
9-Nov-21	Review and analyze [REDACTED]	Contract Time	Petition	1.2
9-Nov-21	Analyze case law re [REDACTED]	Contract Time	Petition	1.3
10-Nov-21	Begin analyzing [REDACTED]	Contract Time	Petition	0.5
10-Nov-21	Continue drafting [REDACTED]	Contract Time	Petition	3.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11-Nov-21	Continue drafting [REDACTED]	Contract Time	Petition	1.9
12-Nov-21	Continue drafting [REDACTED]	Contract Time	Petition	2.2
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16-Nov-21	Review various documents in record on appeal and citations [REDACTED]	Contract Time	Petition	3.5
16-Nov-21	Continue drafting response [REDACTED]	Contract Time	Petition	6.2

Date	Task	Task Type	Matter	Time
17-Nov-21	Complete initial draft [REDACTED]	Contract Time	Petition	10.5
19-Nov-21	Review and edit draft [REDACTED]	Contract Time	Petition	1.8
19-Nov-21	Correspondence with counsel re [REDACTED]	Contract Time	Petition	0.3
22-Nov-21	Revise and edit draft [REDACTED]	Contract Time	Petition	1.1
22-Nov-21	Telephone conference with K. Peterson and D. Frehner re [REDACTED]	Contract Time	Petition	0.5
22-Nov-21	Correspondence [REDACTED]	Contract Time	Petition	0.4
23-Nov-21	Revise and edit draft [REDACTED]	Contract Time	Petition	1.8
24-Nov-21	Review and edit draft [REDACTED]	Contract Time	Petition	0.4
24-Nov-21	Correspondence with K. Peterson re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
29-Nov-21	Correspondence [REDACTED]	Contract Time	Petition	0.4
29-Nov-21	[REDACTED] nd begin reviewing and analyzing arguments [REDACTED]	Contract Time	Petition	1.3

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] at \$200 per hour)

Invoice – No. 2021-12

INVOICE TOTAL: [REDACTED]

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	33.0
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
3-Dec-21	Review minute order from court re [REDACTED]	Contract Time	Petition	0.2
4-Dec-21	Review [REDACTED] in preparation for status hearing and correspondence [REDACTED]	Contract Time	Petition	0.4
5-Dec-21	Correspondence with all opposing counsel re court docket and schedule.	Contract Time	Petition	0.3
6-Dec-21	Correspondence with all opposing counsel re status check hearing.	Contract Time	Petition	0.3
6-Dec-21	Prepare for and attend status hearing with Court.	Contract Time	Petition	1.9
6-Dec-21	Continue review and analyze [REDACTED]	Contract Time	Petition	
6-Dec-21	Strategy conference [REDACTED]	Contract Time	Petition	1.0

Date	Task	Task Type	Matter	Time
7-Dec-21	Research [REDACTED]	Contract Time	Petition	2.5
8-Dec-21	Correspondence with all opposing counsel re draft statement and schedule of issues for court and review draft schedule.	Contract Time	Petition	0.5
9-Dec-21	Continued correspondence with all counsel re revised draft schedule for hearing.	Contract Time	Petition	0.3
10-Dec-21	Review and analyze [REDACTED]	Contract Time	Petition	3.9
13-Dec-21	Review [REDACTED]	Contract Time	Petition	0.3
14-Dec-21	Review and analyze [REDACTED]	Contract Time	Petition	1.1
14-Dec-21	Correspondence with all counsel re revised draft schedule of topics for oral argument.	Contract Time	Petition	0.5
15-Dec-21	Continue researching [REDACTED]	Contract Time	Petition	2.5
15-Dec-21	Review and analyze [REDACTED]	Contract Time	Petition	0.5
16-Dec-21	Review and analyze [REDACTED]	Contract Time	Petition	0.4
16-Dec-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.9
16-Dec-21	Telephone conference with R. Hoerth re [REDACTED]	Contract Time	Petition	0.6

Date	Task	Task Type	Matter	Time
16-Dec-21	Continue reviewing and analyzing [REDACTED]	Contract Time	Petition	1.1
	[REDACTED]			
17-Dec-21	Draft initial outline [REDACTED]	Contract Time	Petition	0.6
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17-Dec-21	Review and analyze [REDACTED]	Contract Time	Petition	0.7
	[REDACTED]			
17-Dec-21	Continue research [REDACTED]	Contract Time	Petition	1.4
	[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
21-Dec-21	Continue drafting [REDACTED]	Contract Time	Petition	4.5
	[REDACTED]			
21-Dec-21	Review [REDACTED]	Contract Time	Petition	0.2
	[REDACTED]			
22-Dec-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.6
	[REDACTED]			

Date	Task	Task Type	Matter	Time
22-Dec-21	Research [REDACTED]	Contract Time	Petition	1.9
23-Dec-21	Review [REDACTED]	Contract Time	Petition	0.2
29-Dec-21	Continue drafting [REDACTED]	Contract Time	Petition	1.3
30-Dec-21	Research [REDACTED]	Contract Time	Petition	1.7
30-Dec-21	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.4
31-Dec-21	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.3

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] at \$200 per hour)

Invoice – No. 2022-01

February 12, 2022

CONTRACT INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnmv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	40.8
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

INVOICE TOTAL: [REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
3-Jan-22	Research [REDACTED]	Contract Time	Petition	0.8
4-Jan-22	Continue review of [REDACTED]	Contract Time	Petition	2.4
5-Jan-22	Continue drafting [REDACTED]	Contract Time	Petition	2.1

1

[REDACTED]

Date	Task	Task Type	Matter	Time
6-Jan-22	Continue drafting [REDACTED]	Contract Time	Petition	1.8
6-Jan-22	Draft [REDACTED]	Contract Time	Petition	2.2
6-Jan-22	Research [REDACTED]	Contract Time	Petition	2.0
7-Jan-22	Draft [REDACTED]	Contract Time	Petition	2.2
7-Jan-22	Complete initial draft of [REDACTED]	Separate	Petition	3.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7-Jan-22	Telephone conference and email correspondence with K. Peterson, R. Hoerth, [REDACTED]	Contract Time	Petition	1.3
7-Jan-22	Revise and edit [REDACTED]	Contract Time	Petition	0.5
8-Jan-22	Research [REDACTED]	Contract Time	Petition	2.5
8-Jan-22	Continue drafting [REDACTED]	Contract Time	Petition	2.8
9-Jan-22	Complete additional research [REDACTED]	Contract Time	Petition	1.5
9-Jan-22	Complete drafts [REDACTED]	Contract Time	Petition	2.4

Date	Task	Task Type	Matter	Time
9-Jan-22	Begin revising [REDACTED]	Contract Time	Petition	0.6
10-Jan-22	Complete full draft of [REDACTED]	Contract Time	Petition	2.5
10-Jan-22	Revise and edit [REDACTED]	Contract Time	Petition	1.7
10-Jan-22	Telephone conferences with K. Peterson re [REDACTED]	Contract Time	Petition	0.5
10-Jan-22	Incorporate comments of [REDACTED]	Contract Time	Petition	2.7
11-Jan-22	Revise and edit draft [REDACTED]	Contract Time	Petition	1.1
11-Jan-22	Telephone conference with [REDACTED]	Contract Time	Petition	0.3
11-Jan-22	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.2
12-Jan-22	Begin reviewing and analyzing [REDACTED]	Contract Time	Petition	1.4
19-Jan-22	Review and analyze [REDACTED]	Contract Time	Petition	0.4
19-Jan-22	Correspondence with all counsel re format for oral argument and other hearing issues.	Contract Time	Petition	0.3
19-Jan-22	Review [REDACTED], and continue reviewing reply briefs.	Contract Time	Petition	0.7

Date	Task	Task Type	Matter	Time
20-Jan-22	Telephone conference with K. Peterson re [REDACTED]	Contract Time	Petition	0.4
		[REDACTED]		[REDACTED]
		[REDACTED]		[REDACTED]
		[REDACTED]		[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] rate of \$200 per hour)

Invoice – No. 2022-01.1

February 28, 2022

EXCESS TIME INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnmv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Excess Hours Summary

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	20.8
[REDACTED]	[REDACTED]

INVOICE TOTAL: [REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
20-Jan-22	Review and analyze [REDACTED]	Excess Time Litigation	Petition	0.5
20-Jan-22	Attend virtual status conference with court.	Excess Time Litigation	Petition	1.8
20-Jan-22	Coordinate with K. Peterson and Vidler re [REDACTED]	Excess Time Litigation	Petition	0.3
21-Jan-22	Review and analyze [REDACTED]	Excess Time Litigation	Petition	0.6

1

[REDACTED]

Date	Task	Task Type	Matter	Time
22-Jan-22	Begin drafting [REDACTED]	Excess Time Litigation	Petition	2.7
24-Jan-22	Continue drafting [REDACTED]	Excess Time Litigation	Petition	2.7
24-Jan-22	Draft portion of [REDACTED]	Excess Time Litigation	Petition	0.7
24-Jan-22	Complete initial draft [REDACTED]	Excess Time Litigation	Petition	2.7
24-Jan-22	Research law [REDACTED]	Excess Time Litigation	Petition	2.1
24-Jan-22	Telephone conferences with D. Frehner and W. Poulsen re [REDACTED]	Excess Time Litigation	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
25-Jan-22	Revise and edit [REDACTED]	Excess Time Litigation	Petition	2.2
25-Jan-22	Correspondence with Vidler re [REDACTED]	Excess Time Litigation	Petition	0.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task Type	Matter	Time
26-Jan-22	Revise and edit [REDACTED]	Excess Time Litigation	Petition	1.1
27-Jan-22	Review documents [REDACTED]	Excess Time Litigation	Petition	1.3
27-Jan-22	Incorporate comments of [REDACTED]	Excess Time Litigation	Petition	0.9
27-Jan-22	Telephone conference and email correspondence with K. Peterson re [REDACTED]	Excess Time Litigation	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Excess Hours				[REDACTED]
Litigation hours		20.8 hrs @ \$300/hr	\$6,240	

INVOICE TOTAL [REDACTED]

Invoice – No. 2022-02

March 8, 2022

CONTRACT INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolmnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary Invoice No. 2022-02

[REDACTED]	
Petition for Judicial Review Matter	40
[REDACTED]	

Hour Summary – Total February Hours

Total Contract Time January ¹	40
Total Excess (separate invoice)	[REDACTED]

INVOICE TOTAL: [REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

¹ [REDACTED]

Date	Task	Task Type	Matter	Time
3-Feb-22	Telephone conference with JA and IT specialist at 8th Judicial District in order to schedule time to meet in courtroom to check audio/visual capabilities and connectivity of courtroom pursuant to Judge's instructions.	Contract Time	Petition	0.5
3-Feb-22	Meet in courtroom with IT specialist to confirm connectivity to courtroom IT and to check audio/visual capabilities of court.	Contract Time	Petition	1.5
8-Feb-22	Conference with Vidler re [REDACTED]	Contract Time	Petition	1.4
8-Feb-22	Create [REDACTED]	Contract Time	Petition	0.6
9-Feb-22	Complete initial general draft [REDACTED]	Contract Time	Petition	0.8
9-Feb-22	Begin detailed [REDACTED]	Contract Time	Petition	0.4
10-Feb-22	Review and analyze [REDACTED]	Contract Time	Petition	2.1
10-Feb-22	Conference with Vidler and D. Frehner re [REDACTED]	Contract Time	Petition	1.8
10-Feb-22	Conference call with D. Frehner re [REDACTED]	Contract Time	Petition	0.3
11-Feb-22	Draft [REDACTED]	Contract Time	Petition	1.5
11-Feb-22	Complete initial draft [REDACTED]	Contract Time	Petition	1.7

Date	Task	Task Type	Matter	Time
11-Feb-22	Telephone conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.3
12-Feb-22	Revise and edit [REDACTED]	Contract Time	Petition	2.2
12-Feb-22	Draft [REDACTED]	Contract Time	Petition	1.5
12-Feb-22	Draft [REDACTED]	Contract Time	Petition	1.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13-Feb-22	Travel to Las Vegas for oral argument.	Contract Time	Petition	2.0
13-Feb-22	Continue preparing [REDACTED]	Contract Time	Petition	2.4
14-Feb-22	[REDACTED]	Contract Time	Petition	7.5
14-Feb-22	Prepare [REDACTED]	Contract Time	Petition	2.4
15-Feb-22	Attend second day of oral argument [REDACTED]	Contract Time	Petition	7.7
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		Contract Time	Invoice 2022-02	40
		Excess Hours	Invoice 2022-02.01	28.7
		[REDACTED]	[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

(Pursuant to Contract for Legal Services, [REDACTED] rate of \$200 per hour)

Invoice – No. 2022-02.01

March 31, 2022

CONTRACT INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolmnv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Excess Hours Summary Invoice No. 2022-02.01

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	28.7
[REDACTED]	[REDACTED]
Total Excess Time February ¹	28.7

INVOICE TOTAL: \$8,610.00

Time Entry Detail

Date	Task	Task Type	Matter	Time
15-Feb-22	Attend second day of oral argument [REDACTED]	Excess Time	Petition	1.0
15-Feb-22	Meet with Vidler re [REDACTED]	Excess Time	Petition	1.5
15-Feb-22	Outline [REDACTED]	Excess Time	Petition	2.1

¹ [REDACTED] d according to the agreement for legal services, and are billed by separate invoice pursuant to request.

Date	Task	Task Type	Matter	Time
16-Feb-22	Attend day three of oral argument [REDACTED]	Excess Time	Petition	8.9
16-Feb-22	Meet with Vidler in order to [REDACTED] [REDACTED]	Excess Time	Petition	2.1
16-Feb-22	Prepare [REDACTED] [REDACTED]	Excess Time	Petition	1.8
17-Feb-22	Attend day four of oral argument [REDACTED]	Excess Time	Petition	8.1
21-Feb-22	Return travel from hearing on petitions.	Excess Time	Petition	2.0
22-Feb-22	Review correspondence [REDACTED] [REDACTED]	Excess Time	Petition	0.3
25-Feb-22	Review and analyze [REDACTED] [REDACTED]	Excess Time	Petition	0.4
28-Feb-22	Telephone calls with DA, Vidler, and W. Poulsen re [REDACTED] [REDACTED]	Excess Time	Petition	0.5

Total Excess Hours		28.7
Litigation Hours	28.7 hrs @ \$300/hr	\$8,610

INVOICE TOTAL \$8,610.00

Invoice – No. 2022-03

April 18, 2022

CONTRACT INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnmv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary Invoice No. 2022-03

[REDACTED]	[REDACTED]
Petition for Judicial Review Matter	18.0
[REDACTED]	[REDACTED]

Hour Summary – March

[REDACTED]	[REDACTED]
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INVOICE TOTAL: [REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
1-Mar-22	Review and analyze [REDACTED]	Contract Time	Petition	0.6
1-Mar-22	Review and analyze [REDACTED]	Contract Time	Petition	1.1

1

[REDACTED]

Date	Task	Task Type	Matter	Time
3-Mar-22	Review and analyze [REDACTED]	Contract Time	Petition	0.4
3-Mar-22	Telephone conferences with D. Frehner re [REDACTED]	Contract Time	Petition	0.5
7-Mar-22	Telephone conference with R. Hoerth re [REDACTED]	Contract Time	Petition	0.5
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10-Mar-22	Prepare for and attend [REDACTED]	Contract Time	Petition	0.6
11-Mar-22	Telephone conference with D. Frehner re [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16-Mar-22	Correspondence with Vidler and client re [REDACTED]	Contract Time	Petition	0.5
18-Mar-22	Prepare for [REDACTED]	Contract Time	Petition	0.6
18-Mar-22	Telephone conference [REDACTED]	Contract Time	Petition	0.4
21-Mar-22	Review and edit [REDACTED]	Contract Time	Petition	0.4

Date	Task	Task Type	Matter	Time
21-Mar-22	Correspondence [REDACTED]	Contract Time	Petition	0.3
21-Mar-22	Telephone conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.3
23-Mar-22	Review and analyze [REDACTED]	Contract Time	Petition	0.3
23-Mar-22	Correspondence [REDACTED]	Contract Time	Petition	0.3
25-Mar-22	Begin drafting [REDACTED]	Contract Time	Petition	0.6
28-Mar-22	Telephone conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.3
28-Mar-22	Complete draft [REDACTED]	Contract Time	Petition	0.8
29-Mar-22	Telephone conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.2
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
29-Mar-22	Revise [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
29-Mar-22	Review [REDACTED]	Contract Time	Petition	0.8
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
29-Mar-22	[REDACTED]	Contract Time	Petition	2.5

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
30-Mar-22	Meet with [REDACTED]	Contract Time	Petition	0.5
30-Mar-22	Attend [REDACTED]	Contract Time	Petition	1.9
30-Mar-22	Return travel from Overton to Panaca following LWRFS workshop.	Contract Time	Petition	2.5
31-Mar-22	Correspondence with Vidler re [REDACTED]	Contract Time	Petition	0.5
31-Mar-22	Telephone call with D. Frehner re [REDACTED]	Contract Time	Petition	0.3
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

INVOICE TOTAL [REDACTED]

Invoice – No. 2022-03

May 9, 2022

CONTRACT INVOICE

Bill To:

Lincoln County Water District
c/o Wade Poulsen
1005 Main Street
Panaca, Nevada 89042
wpoulsen@lincolnmv.com

Remit Payment To:

Wayne Klomp
1783 Trek Trail
Reno, Nevada 89521
(775) 770-0386
wayne@greatbasinlawyer.com

Billed Hours Summary Invoice No. 2022-04

Task	Hours
Petition for Judicial Review Matter	8.5

Hour Summary – April

Month	Hours
April	

INVOICE TOTAL: [REDACTED]

Time Entry Detail

Date	Task	Task Type	Matter	Time
1-Apr-22	Conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

¹ [REDACTED]

Date	Task	Task Type	Matter	Time
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13-Apr-22	Review and analyze [REDACTED]	Contract Time	Petition	0.5
14-Apr-22	Telephone conference with W. Poulsen re [REDACTED]	Contract Time	Petition	0.2
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19-Apr-22	Preliminary review [REDACTED]	Contract Time	Petition	0.8

Date	Task	Task Type	Matter	Time
19-Apr-22	Correspondence with co-counsel and Vidler re [REDACTED]	Contract Time	Petition	0.3
19-Apr-22	Telephone call with client re [REDACTED]	Contract Time	Petition	0.4
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
20-Apr-22	Review and analyze [REDACTED]	Contract Time	Petition	1.3
20-Apr-22	Correspondence with client and Vidler re [REDACTED]	Contract Time	Petition	0.9
20-Apr-22	Telephone calls with client and co-counsel re [REDACTED]	Contract Time	Petition	0.8
21-Apr-22	Correspondence [REDACTED]	Contract Time	Petition	0.5
22-Apr-22	Review and analyze [REDACTED]	Contract Time	Petition	0.6
22-Apr-22	Research [REDACTED]	Contract Time	Petition	1.1
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Date	Task	Task Type	Matter	Time
26-Apr-22	Prepare for and attend [REDACTED]	Contract Time	Petition	0.7
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Hours				[REDACTED]

INVOICE TOTAL [REDACTED]

Lincoln County Water District
Attn: Mr. Wade Poulsen
1005 Main St.
PO Box 936
Panaca, NV 89042

Report Date: 5/9/2022

Matter: 82212.00002 Petition for Judicial Review

Services Rendered between 1/1/1800 and 5/9/2022:

Timekeeper			Date	Hours	Rate	Amount
1	Attorney Services					
5575	Klomp, Wayne	Begin reviewing and analyzing [REDACTED]	8/11/2020	1.40	275.00	385.00
5575	Klomp, Wayne	Telephone conference with D. Frehner re [REDACTED]	8/12/2020	0.60	275.00	165.00
5575	Klomp, Wayne	Review and analyze [REDACTED]	8/19/2020	0.50	275.00	137.50
5575	Klomp, Wayne	Telephone conference with D. Frehner re [REDACTED]	8/20/2020	0.40	275.00	110.00
5575	Klomp, Wayne	Review and edit draft [REDACTED]	8/20/2020	0.90	275.00	247.50
5575	Klomp, Wayne	Conference with counsel for [REDACTED]	8/24/2020	0.70	275.00	192.50
5575	Klomp, Wayne	Review and edit draft [REDACTED]	8/24/2020	0.90	275.00	247.50
5575	Klomp, Wayne	Review and analyze [REDACTED]	8/24/2020	0.60	275.00	165.00
5575	Klomp, Wayne	Research [REDACTED]	8/26/2020	0.40	275.00	110.00
5575	Klomp, Wayne	Draft [REDACTED]	8/27/2020	3.40	275.00	935.00
5575	Klomp, Wayne	Telephone conference with all counsel and clients re [REDACTED]	8/27/2020	0.60	275.00	165.00
5575	Klomp, Wayne	Telephone conference with client re [REDACTED]	8/27/2020	0.60	275.00	165.00
5575	Klomp, Wayne	Research [REDACTED]	8/27/2020	2.60	275.00	715.00

Timekeeper	Date	Hours	Rate	Amount
5575 Klomp, Wayne	8/28/2020	0.60	275.00	165.00
5575 Klomp, Wayne	9/4/2020	0.70	275.00	192.50
5575 Klomp, Wayne	9/9/2020	0.30	275.00	82.50
5575 Klomp, Wayne	9/15/2020	0.30	275.00	82.50
5575 Klomp, Wayne	9/16/2020	0.40	275.00	110.00
5575 Klomp, Wayne	9/17/2020	0.20	275.00	55.00
5575 Klomp, Wayne	9/22/2020	0.30	275.00	82.50
5575 Klomp, Wayne	10/5/2020	0.50	275.00	137.50
5575 Klomp, Wayne	10/5/2020	0.40	275.00	110.00
5575 Klomp, Wayne	10/12/2020	0.30	275.00	82.50
5575 Klomp, Wayne	10/13/2020	0.30	275.00	82.50
5575 Klomp, Wayne	11/2/2020	0.90	275.00	247.50
5575 Klomp, Wayne	11/2/2020	0.30	275.00	82.50
5575 Klomp, Wayne	11/9/2020	0.40	275.00	110.00
5575 Klomp, Wayne	11/10/2020	0.60	275.00	165.00
5575 Klomp, Wayne	2/15/2021	0.40	275.00	110.00
5575 Klomp, Wayne	4/26/2021	1.00	275.00	275.00

Timekeeper		Date	Hours	Rate	Amount	
5575	Klomp, Wayne	Begin analyzing [REDACTED]	4/26/2021	1.60	275.00	440.00
5575	Klomp, Wayne	Correspondence with client and Vidler re [REDACTED]	4/27/2021	0.20	275.00	55.00
5575	Klomp, Wayne	Analyze court [REDACTED]	4/27/2021	0.20	275.00	55.00
5575	Klomp, Wayne	Prepare for call with client and Vidler re [REDACTED]	4/28/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Call with client and Vidler re [REDACTED]	4/28/2021	0.70	275.00	192.50
5575	Klomp, Wayne	Review and analyze [REDACTED]	4/28/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Review and analyze [REDACTED]	5/4/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Review and analyze [REDACTED]	5/11/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Telephone conference with D. Frehner re [REDACTED]	5/18/2021	0.20	275.00	55.00
5575	Klomp, Wayne	Telephone conference with Vidler and client re [REDACTED]	5/19/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Review draft [REDACTED]	5/20/2021	0.50	275.00	137.50
5575	Klomp, Wayne	Correspondence from opposing counsel re stipulation to consolidate actions.	5/21/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Telephone conference with client and review and analyze [REDACTED]	5/24/2021	0.70	275.00	192.50
5575	Klomp, Wayne	Conference with Vidler re [REDACTED]	5/24/2021	0.70	275.00	192.50
5575	Klomp, Wayne	Telephone conference with Vidler re [REDACTED]	5/26/2021	0.70	275.00	192.50
5575	Klomp, Wayne	Draft [REDACTED]	5/26/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Conference with [REDACTED]	5/26/2021	0.60	275.00	165.00
5575	Klomp, Wayne	Review and analyze [REDACTED]	5/26/2021	0.80	275.00	220.00
5575	Klomp, Wayne	Conference with client [REDACTED]	5/27/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Telephone conference with counselor for Vidler re [REDACTED]	5/27/2021	0.40	275.00	110.00

Timekeeper			Date	Hours	Rate	Amount
5575	Klomp, Wayne	Attend status hearing in consolidated cases.	5/27/2021	1.20	275.00	330.00
5575	Klomp, Wayne	Final preparations [REDACTED]	5/27/2021	0.70	275.00	192.50
5575	Klomp, Wayne	Analyze court order [REDACTED]	6/4/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Conference with counsel for [REDACTED] re [REDACTED]	6/4/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Conference with counsel for [REDACTED] re [REDACTED]	6/4/2021	0.50	275.00	137.50
5575	Klomp, Wayne	Telephone conference with client re [REDACTED]	6/4/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Correspondence with co-counsel re [REDACTED]	6/8/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Review [REDACTED]	6/9/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Analyze [REDACTED] s	6/11/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Analyze [REDACTED]	6/11/2021	0.40	275.00	110.00
5575	Klomp, Wayne	Review and analyze terms [REDACTED]	6/11/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Correspondence with counsel for Vidler/CSI re [REDACTED]	6/11/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Correspondence with all counsel re [REDACTED]	6/14/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Correspondence with all counsel re [REDACTED]	6/15/2021	0.20	275.00	55.00
5575	Klomp, Wayne	Analyze court filings [REDACTED]	6/17/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Correspondence with opposing counsel re additional intervention stipulations with Church and minutes from court hearing.	6/22/2021	0.20	275.00	55.00
5575	Klomp, Wayne	Correspondence with co-counsel for Vidler re [REDACTED]	6/24/2021	0.30	275.00	82.50
5575	Klomp, Wayne	Correspondence with co-counsel re [REDACTED]	6/29/2021	0.40	275.00	110.00
				Attorney Services	38.80	10,670.00
				Fee Totals	38.80	10,670.00
				Discount		

Timekeeper		Hours	Eff Rate	Amount
5575	Klomp, Wayne	38.80	275.00	10,670.00
			Report Range Fees \$	10,670.00
			Report Range Costs \$	0.00
			Total Report Range \$	10,670.00
			Previous Fees \$	0.00
			Previous Costs \$	0.00
			Grand Total \$	<u>10,670.00</u>

EXHIBIT “6”

SETTLEMENT AGREEMENT AMONG THE STATE ENGINEER, STATE OF NEVADA, JASON KING, P.E., ACTING NEVADA STATE ENGINEER, LINCOLN COUNTY WATER DISTRICT AND VIDLER WATER COMPANY

(KANE SPRINGS AGREEMENT)

Lincoln County Water District (the "District"), Vidler Water Company ("Vidler"), the State Engineer, State of Nevada, Jason King, P.E., Acting Nevada State Engineer; (collectively, the "State Engineer") enter into the following Settlement Agreement and Mutual Release ("Agreement," "Settlement Agreement," or "Kane Springs Agreement") this 1st of April, 2010. The parties shall be referred to individually as "Party" and collectively as "Parties."

RECITALS

1. The District and Vidler previously filed Applications 74147, 74148, 74149, and 74150 for the appropriation of water in Kane Springs Valley Hydrographic Basin (the "Kane Springs Applications").

2. The District and Vidler met with State Engineer Tracy Taylor on March 15, 2007, regarding the Kane Springs Applications. The District and Vidler requested that they be allowed to continue the study of the Kane Springs Valley Hydrographic Basin and perform additional data collection and testing in support of the Kane Springs Applications. No written documentation of this agreement was drafted or entered into the application files.

3. After consultation and agreement with the State Engineer, the District and Vidler began to gather precipitation data and other related data to determine the recharge of the Kane Springs Valley Hydrographic Basin. This work remains ongoing.

4. On April 29, 2009, State Engineer's Ruling No. 5987 was issued denying the Kane Springs Applications.

5. The Parties agree that the denial of the Kane Springs Applications was in contradiction of the unwritten agreement and should be corrected.

6. The Parties are entering into a separate settlement agreement (“Tule Desert Agreement”) concerning applications that Lincoln and Vidler have in the Tule Desert Groundwater Basin. The Tule Desert Agreement resolves Case No. CV-0518009 entitled *Lincoln County Water District and Vidler Water Company v. State Engineer, State of Nevada* filed by the District and Vidler in the Seventh Judicial District Court of the State of Nevada, in and for the County of Lincoln and Case No. CV00392-LRH-VPC entitled *Lincoln County Water District and Vidler Water Company v. Tracy Taylor, P.E. and Jason King, P.E.* filed in the United States District Court for the District of Nevada in Case No. CV00392-LRH-VPC.

7. This Kane Springs Agreement is the separate settlement agreement referenced in Section IV of the Tule Desert Agreement.

AGREEMENT

In consideration of the mutual promises, duties, and agreements set forth below, the Parties agree as follows:

I. Studies Under N.R.S. § 533.368 and the Use of Third Party Technical Consultants.

The Parties incorporate Section III of the Tule Desert Agreement into this Agreement by this reference, and agree that the terms of Section III of the Tule Desert Agreement shall apply to the State Engineer’s review and determination regarding the Kane Springs Applications.

II. Reinstatement of the Kane Springs Applications to Appropriate Groundwater by Lincoln County Water District and Vidler Water Company in the Kane Springs Valley Hydrographic Basin.

A. The State Engineer shall reinstate the Kane Springs Applications and return them to application status with the same priority as under the original filing in the records of the Nevada Division of Water Resources.

B. The State Engineer shall allow the District and Vidler to continue with the study of Kane Springs Valley Hydrographic Basin to gather additional information to more accurately determine the water available to appropriate under NRS 533.370.

1. The State Engineer, the District, and Vidler shall meet annually to review the data submitted by the District and Vidler. The third party Reviewing Consultant (as described in Section III of the Tule Desert Agreement) shall participate in these meetings. The State Engineer shall apply the provisions of Section III of the Tule Desert Agreement in setting criteria and in determining and in identifying necessary studies.
2. The District, Vidler, and the State Engineer agree that Daniel B. Stephens and Peter Mock shall serve as the Study Consultants (as described in Section III of the Tule Desert Agreement) for the Kane Springs Applications.

III. Ratification by Lincoln County Water District.

The parties recognize that this Settlement Agreement needs ratification by Lincoln County Water District's Board of Trustees. The representatives of both the State Engineer and Vidler are authorized to enter into this Settlement Agreement.

IV. Dismissal of Actions.

Upon full execution of the Settlement Agreements containing the terms herein contained and ratification by Lincoln County Water District's Board of Trustees, the State Engineer shall reinstate the Kane Springs Applications to their original priority date, and the Parties shall stipulate to vacate Ruling No. 5987 and to dismiss the state district court appeal of State Engineer's Ruling No. 5987, more specifically identified as *Lincoln County Water District and*

Vidler Water Company v. State Engineer, Case No.CV0519009, filed in the 7th Judicial District Court in and for the State of Nevada, with each party to bear its own costs and attorneys' fees.

V. **Extensions of Time.**

This Agreement shall not affect or limit the State Engineer's discretion in considering any applications for extensions of time for the filing of proof of completion of work, proofs of beneficial use, or to avoid forfeiture. Any requests for extension of time shall be addressed under controlling provisions of law.

VI. **No Precedential Effect.**

The State Engineer enters into this Agreement because of the unique factual circumstances surrounding this case. Aside from the rights and responsibilities established in this Agreement, the Agreement has no precedential effect in any proceeding involving these Parties or any other parties and may not be relied upon as evidence of policy or practices of the State Engineer; provided, however, that the provisions of Section III of the Tule Desert Agreement incorporated by reference in Section I, above, may be relied upon and control the processing of applications as set forth in the provisions of Section III of the Tule Desert Agreement. This Agreement does not limit the State Engineer's authority or discretion as it relates to consideration of any application to appropriate water, application for extension of time, or any application to change the manner of use, place of use, point of diversion, or means of diversion of any water right.

VII. **Mutual Release.**

Other than claims arising from rights and obligations set forth in this Agreement, each of the Parties, for and in consideration of the mutual promises, duties, agreements, and consideration set forth in this Agreement, release, acquit, and forever discharge the other Parties,

their agents, employees, officers, directors, representatives, affiliates, successors, and assigns, of and from any and all claims, liabilities, demands, and causes of action, known or unknown, asserted or unasserted, which they had or may now have as a result of or arising out of or by reason of the facts and circumstances surrounding the claims and allegations filed in *Lincoln County Water District and Vidler Water Company v. State Engineer*, Case No.CV0519009, filed in the 7th Judicial District Court in and for the State of Nevada.

VIII. No Admission of Liability.

The Parties agree and acknowledge that this is a compromise of disputed claims and that the agreements shall not be construed as an admission of liability on the part of any Party; the Parties expressly deny any liability relating to the claims asserted.

IX. Entire Agreement.

This Agreement contains the entire agreement among the Parties, and the terms of the Agreement are contracted and not mere recitals. No provision of the Agreement may be modified except in writing signed by all Parties hereto.

X. Successors and Assigns.

This Agreement, and the rights and obligations contained herein, shall inure to the benefit and burden of and shall be binding on the grantees, successors, and assigns of the Parties to this Agreement.

XI. Governing Law.

This Agreement will be governed by and in accordance with the laws of the State of Nevada. Any rule requiring construction or interpretation against the drafter of the document is waived and this Agreement has been and is deemed drafted by all Parties in a mutual effort.

XII. Agreement Freely Entered into by the Parties.

Each Party represents and warrants that each has freely entered into this Agreement without fraud, duress, or any undue influence. Each Party represents and warrants that no promise or inducement has been offered except as set forth herein; that this Agreement is executed without reliance upon any statement or representation except as contained herein; and that the terms and conditions of this Agreement are fair and reasonable. Each Party represents and warrants that it or he was represented by competent counsel and was advised regarding the risks, duties, and obligations set forth in this Agreement.

XIII. Facsimile and Photocopies.

Facsimiles and photocopies of this Agreement shall be considered originals for all purposes, including, but in no way limited to, any court proceedings.

XIV. Signed Counterparts.

This Agreement may be executed in any number of counterparts, each of which together shall be deemed to be an original, and all of which together shall be deemed to be one and the same instrument. The signatures required for execution may be transmitted by facsimile or e-mail, and such signatures shall be deemed duplicate originals, shall be effective upon receipt, may be admitted in evidence, and shall fully bind the Parties and persons making such signatures.

THE STATE ENGINEER, STATE OF NEVADA

Jason King P.E.
By: Jason King, P.E., Acting State Engineer

Dated: 4/21/10

LINCOLN COUNTY WATER DISTRICT

By: Wade Poulsen, Lincoln County
Water District Manager

Dated: _____

VIDLER WATER COMPANY

By: Dorothy Timian-Palmer, P.E., President
and Chief Operating Officer


Dated: _____

THE STATE ENGINEER, STATE OF NEVADA

By: Jason King, P.E., Acting State Engineer

Dated: _____

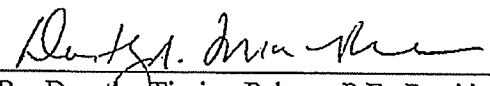
LINCOLN COUNTY WATER DISTRICT



By: Wade Poulsen, Lincoln County
Water District Manager

Dated: 4/27/2010

VIDLER WATER COMPANY



By: Dorothy Timian-Palmer, P.E., President
and Chief Operating Officer

Dated: 4/27/2010

Approved and Consented to as to form:

RYLEY CARLOCK & APPLEWHITE

By: J. J. Wickler
John C. Lemaster
Jenny J. Wickler
Sean T. Hood

Dated: 4/20/10

ALLISON, MacKENZIE, PAVLAKIS, WRIGHT & FAGAN

By: _____
Karen A. Peterson

Dated: _____

Attorneys for Vidler Water Company, Inc.

DYLAN V. FREHNER, ESQ.

By: _____
Dylan V. Frehner

Dated: _____

Attorney for Lincoln County Water District

NEVADA ATTORNEY GENERAL'S OFFICE

By: _____
Bryan L. Stockton
Michael L. Wolz

Dated: _____

*Attorneys for the State Engineer, State of Nevada,
and Jason King, P.E., Acting State Engineer*


Approved and Consented to as to form:

RYLEY CARLOCK & APPLEWHITE

By: _____
John C. Lemaster
Jenny J. Winkler
Sean T. Hood

Dated: _____

ALLISON, MacKENZIE, PAVLAKIS, WRIGHT & FAGAN

By: 
Karen A. Peterson

Dated: 4-20-10

Attorneys for Vidler Water Company, Inc.

DYLAN V. FREHNER, ESQ.

By: _____
Dylan V. Frehner

Dated: _____

Attorney for Lincoln County Water District

NEVADA ATTORNEY GENERAL'S OFFICE

By: _____
Bryan L. Stockton
Michael L. Wolz

Dated: _____

*Attorneys for the State Engineer, State of Nevada,
and Jason King, P.E., Acting State Engineer*

Approved and Consented to as to form:

RILEY CARLOCK & APPLEWHITE

By: _____
John C. Lemaster
Jenny J. Winkler
Sean T. Hood

Dated: _____

ALLISON, MacKENZIE, PAVLAKIS, WRIGHT & FAGAN

By: _____
Karen A. Peterson

Dated: _____

Attorneys for Vidler Water Company, Inc.

DYLAN V. FREHNER, ESQ.

By:  _____
Dylan V. Frehner

Dated: 4-21-10

Attorney for Lincoln County Water District

NEVADA ATTORNEY GENERAL'S OFFICE

By: _____
Bryan L. Stockton
Michael L. Wolz

Dated: _____

*Attorneys for the State Engineer, State of Nevada,
and Jason King, P.E., Acting State Engineer*

Approved and Consented to as to form:

RYLEY CARLOCK & APPLEWHITE

By: _____
John C. Lemaster
Jenny J. Winkler
Sean T. Hood

Dated: _____

ALLISON, MacKENZIE, PAVLAKIS, WRIGHT & FAGAN

By: _____
Karen A. Peterson

Dated: _____

Attorneys for Vidler Water Company, Inc.

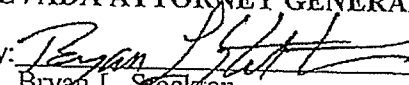
DYLAN V. FREHNER, ESQ.

By: _____
Dylan V. Frehner

Dated: _____

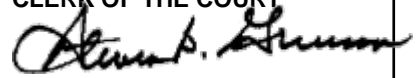
Attorney for Lincoln County Water District

NEVADA ATTORNEY GENERAL'S OFFICE

By:  _____
Bryan L. Stockton
Michael L. Wolz

Dated: 21 APR 2010

*Attorneys for the State Engineer, State of Nevada,
and Jason King, P.E., Acting State Engineer*



1 **ERR**

2 DYLAN V. FREHNER, ESQ.
3 Nevada State Bar No. 9020
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6 P.O. Box 60
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9 Email: dfrehner@lincolncountynv.gov

10 WAYNE O. KLOMP, ESQ.
11 Nevada State Bar No. 10109
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14 Reno, Nevada 89521
15 Telephone: (775) 770-0386
16 Email: wayne@greatbasinlawyer.com

17 KAREN A. PETERSON, ESQ.
18 Nevada State Bar No. 366
19 **ALLISON MacKENZIE, LTD.**
20 402 North Division Street
21 Carson City, Nevada 89703
22 Telephone: (775) 687-0202
23 Email: kpeterson@allisonmackenzie.com

24 Attorneys for Petitioners, LINCOLN COUNTY
25 WATER DISTRICT and VIDLER WATER
26 COMPANY, INC.

27 **DISTRICT COURT**
28 **CLARK COUNTY, NEVADA**

19 LAS VEGAS VALLEY WATER DISTRICT,
20 and SOUTHERN NEVADA WATER
21 AUTHORITY, et al.,

Case No. A-20-816761-C

Dept. No. 1

21 Petitioners,

Consolidated with Cases:

22 vs.

A-20-817765-P

A-20-818015-P

A-20-817977-P

23 ADAM SULLIVAN, P.E., Acting
24 Nevada State Engineer, et al.,

A-20-818069-P

A-20-817840-P

A-20-817876-P

25 Respondent.

A-21-833572-J

26 **ERRATA PROVIDING EXHIBIT TO DECLARATION OF KAREN A. PETERSON IN**
27 **SUPPORT OF LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER**
28 **COMPANY, INC.'S MOTION FOR ATTORNEYS' FEES**

///

ALLISON MacKENZIE, LTD.
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Telephone: (775) 687-0202 Fax: (775) 882-7918
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ERRATA PROVIDING EXHIBIT TO DECLARATION OF KAREN A. PETERSON IN SUPPORT OF LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER COMPANY, INC.'S MOTION FOR ATTORNEYS' FEES

Attached hereto is the Exhibit containing the Allison MacKenzie, Ltd. firm information and biographical information about attorneys employed by the firm who worked at various times on Petitioners' matters inadvertently not attached to the Declaration of Karen A. Peterson in Support of Lincoln County Water District's and Vidler Water Company, Inc.'s Motion for Attorneys' Fees submitted as Exhibit "1" to Lincoln County Water District's and Vidler Water Company, Inc.'s Motion for Attorneys' Fees filed with the Court on May 10, 2022.

DATED this 11th day of May, 2022.

ALLISON MacKENZIE, LTD.
402 North Division Street
Carson City, Nevada 89703
Telephone: (775) 687-0202

By: /s/ Karen A. Peterson
KAREN A. PETERSON #366
Email: kpeterson@allisonmackenzie.com

Attorneys for Vidler Water Company, Inc.

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALLISON MacKENZIE, LTD., Attorneys at Law, and that on this date, I caused a true and correct copy of the foregoing document to be served on all parties to this action by electronic service to the participants in this case who are registered with the Eighth Judicial District Court’s Odyssey eFileNV File & Service system in this matter.

DATED this 11th day of May, 2022.

/s/ Nancy Fontenot
NANCY FONTENOT

4883-7797-2255, v. 1

KAREN A. PETERSON
JAMES R. CAVILIA
CHRIS MACKENZIE
RYAN D. RUSSELL
JOEL W. LOCKE
JUSTIN TOWNSEND
KYLE A. WINTER

DANIEL S. JUDD
EMILY MEIBERT



ALLISON MACKENZIE
ATTORNEYS & COUNSELORS AT LAW

GEORGE V. ALLISON
JOAN C. WRIGIT
PATRICK V. FAGAN
MIKE PAVLAKIS
OF COUNSEL

ANDREW MACKENZIE
(1941-2018)
MIKE SOUMBENIOTIS
(1932-1997)

The law offices of Allison MacKenzie, Ltd. have deep roots in Nevada. Founders George Allison, a lifelong resident of Carson City, and Andrew MacKenzie, from Yerington, were conscious of the firm's strong ties to both Nevada and the state capital. Our shareholders hail from Nevada's broad expanse and from old-line Nevada families: Jim Cavilia from Reno, and Chris MacKenzie, Ryan Russell, Joel W. Locke, and Kyle Winter from Carson City. Karen Peterson comes from Michigan and has been in Nevada for nearly three decades. Justin Townsend began his legal practice in Henderson, Nevada before relocating to Carson City. They all feel their roots are firmly in this state.

Even the land occupied by our distinctive two-story, Spanish-style headquarters building, which occupies most of a block in Carson City, is rich in this capital city's heritage, in that it was formerly the site of a historic church and a 100-year-old boardinghouse.

We are very proud of the accomplishments of our former members, such as former Governor and United States Senator Paul Laxalt, Senior United States Ninth Circuit Court of Appeals Judge Melvin Brunetti, First Judicial District Court Judge James Todd Russell, and former Interstate Commerce Commission chairman Reese Taylor.

The firm is what our shareholders modestly refer to as a very traditional, business-oriented firm, with substantial involvement in both local and state government, in addition to the general practice needs of our clients. We provide our clients with a diversity of legal experience not customary in moderate-size firms. Though our office is in Carson City, our work ranges from one end of the state to the other, and indeed, across the country. Our clients include substantial corporate firms, gaming establishments, major project developers, owners associations, public utilities, hospitals, school districts, trucking firms and regulatory agencies.

The firm represents clients in contested and uncontested court proceedings and administrative hearings throughout Nevada in both the state and federal legal and administrative systems.

In addition to providing general legal work, which includes estate planning, state agency and regulatory work, Allison MacKenzie attorneys, as registered lobbyists, represent various clients before the state legislature and interim committees. We have represented various development projects and have helped draft state laws and regulations governing natural resources, energy, credit cards, interval resort projects and membership campground projects. Members of our firm have also participated in drafting state regulations governing trucking, public utilities, municipal incorporation, geothermal exploration, Nevada's unclaimed property act, and myriad other matters involving state regulation.

We have been involved in a number of large projects throughout northern Nevada. A major interval resort development in Lake Tahoe has involved the firm in land-use planning, development, and other legal representation over the past several years. Yet another development project involving the firm's expertise features nearly 1,000 residential units, an Arnold Palmer designed golf course, and business and industrial parks adjacent to the project's general aviation airport in Dayton, Nevada.

Our firm's members are actively involved in professional and other organizations in our community. Attorneys within the firm hold or have held positions in the state legislature, on the state judicial selection committee, Nevada Commission on Ethics, the state board of bar examiners, the State Board of Bar Governors, the state continuing legal education committee, the state practice and procedure committee, disciplinary committee, local bar administrative and fee dispute committee, and as Judge Pro Tem. Members of the firm serve or have served on the Carson City Redevelopment Authority, Nevada Wildlife Commission, Natural Resources Advisory Board, Historical Resources Committees, the Carson City Airport Advisory Committee, Saferide, Boys & Girls Club, Special Olympics, Soroptimist International, Carson Water Management Board, Brewery Arts Center, CASA, Children's Museum of Northern Nevada, and a variety of other charitable and community-involved programs. We are involved in the state and the community, and through that involvement we feel we have the pulse of northern Nevada and the state capital.

We serve a relatively large number of clients without sacrificing the personal relationship of attorney and client with our present complement of 15 lawyers on staff or of counsel.

Allison MacKenzie, Ltd. is looking forward to a period of continued growth in the economy of the state of Nevada and will be prepared to address the challenges of the coming years by continuing to grow to meet the needs of our clients.

AREAS OF PRACTICE

General Civil and Trial Practice in all State and Federal Courts. Administrative, Bankruptcy Law, Business Law, Charitable Foundations, Commercial, Corporate For-Profit and Non-Profit Organizations, Estate Planning, Geothermal, Hospital and Health Care, Land Use, Labor and Employment, Mortgage, Municipal, Natural Resources, Negligence, Owners Associations, Probate, Public Schools/Education Law, Public Utility, Real Estate, Telecommunications, Transportation, Trusts, and Water Law.

INDIVIDUAL ATTORNEY BIOGRAPHIES

MIKE PAVLAKIS, born Ely, Nevada, April 2, 1952; admitted to bar, 1978, California; 1979, Nevada and U.S. Court of Appeals, Ninth Circuit. Education: Chapman College (B.A., 1974); University of Amsterdam (Diploma in European Integration, 1976); Hastings College of Law, University of California (J.D., 1978). Law Clerk, Nevada Supreme Court, 1978-1979. Member: First Judicial District Court and Washoe County Bar Associations; State Bar of Nevada; American Health Lawyers Association. Practice Areas: Business Law, Hospital Law, School Law, Real Estate Law, Wills, Trusts and Estates.

KAREN A. PETERSON, born Highland Park, Michigan, February 25, 1957; admitted to bar, 1983, Nevada; U.S. District Court, District of Nevada, 1983; and Ninth Circuit Court of Appeals, 2007. Education: Michigan State University (B.S., 1979); University of North Carolina at Chapel Hill (J.D., 1982). Phi Beta Kappa. President, Mortar Board, MSU Chapter, 1978-1979. Nevada State Board of Bar Examiners, 1990-2000, Chairman 1998-2000. Judge Pro Tem, Carson City Justice and Municipal Courts, 1999-. Member: Washoe County and First Judicial Bar Associations; State Bar of Nevada; Northern Nevada Women Lawyer's Association; Soroptimist International of Carson City. Special Agencies: Department of Water Resources; Public Utilities Commission; Department of Taxation; Division of Environmental Protection. Practice Areas: Administrative Law, Public Utilities, Telecommunications Law, Water Rights Law, Litigation, Business Law.

JAMES R. CAVILIA, born Reno, Nevada, January 6, 1965; admitted to bar, 1990, Nevada; 1991, California. Education: University of Nevada, Reno (B.A., with distinction, 1987); Santa Clara University (J.D., 1990). Phi Kappa Phi. Law Clerk to Justice Charles Springer, Supreme Court of Nevada, 1991. Member: Carson City Charter Review Committee (Chairman, 1996-1999); Member, Board of Directors, Northern Nevada Development Authority, 2003-2005; Boys' and Girls' Club of Western Nevada (President, 1999, Member, Board of Directors, 1994-2003); Member, Board of Trustees, Catholic Community Services of Northern Nevada (2000-). Member: Washoe County and First Judicial District; State Bar of Nevada. Practice Areas: Real Estate Development Law, Land Use, Real Estate Transactions, Litigation, Bankruptcy Law, Business Law, Water Law, General Practice.

CHRISTOPHER MacKENZIE, born Reno, Nevada, June 4, 1967; admitted to bar, 1993, Nevada; Nevada and U.S. District Court, District of Nevada; U.S. Court of Appeals, Ninth Circuit. Education: University of Nevada, Reno (B.S. Business Administration, 1990); University of Idaho (J.D., 1993). Law Clerk to Honorable Michael E. Fondi, First Judicial District Court, 1993-1994; Nevada Wildlife Commission (Commissioner 2001-2007; Chairman 2005-2007); Carson City Wildlife Management Advisory Committee (Chairman 1999-2001, Member 1998-2001); Carson City Downtown Consortium, Business Action Group, (Chairman 2008); Carson City Charter Review Committee, 2010 and 2012. Member: Washoe County, First Judicial District and American Bar Associations; State Bar of Nevada. Practice Areas: Contracts, Real Estate, Water Law, Corporate Formation, Partnerships, Business Law, Administrative Law.

RYAN D. RUSSELL, born Carson City, Nevada, April 17, 1978; admitted to bar, 2003, Nevada; U.S. District Court, District of Nevada. Education: University of Nevada, Reno (B.S. Business Administration, 2000); William S. Boyd School of Law, University of Nevada, Las Vegas (J.D. 2003). Law Clerk for Honorable William A. Maddox, First Judicial District Court, 2003-2004. Boys' and Girls' Club of Western Nevada (President, 2009, Member, Board of Directors 2004-2010); Member Board of Governors, State Bar of Nevada (2013-) Member: Washoe County and American Bar Association; State Bar of Nevada. Practice Areas: General Civil Practice, Litigation, Business Law.

JOEL W. LOCKE, born Reno, Nevada, September 11, 1977; admitted to bar, 2006, Nevada. Education: University of Nevada, Reno (B.S. Finance, 2000); Gonzaga University College of Law (J.D., 2006). Law Clerk for Honorable William A. Maddox, First Judicial District Court, 2006-2007. Member: First Judicial District, Ninth Judicial District, Washoe County and American Bar Associations; State Bar of Nevada. Practice Areas: Probate, Trusts and Estates, Wills, Living Wills, Gaming Law, Business Formation, Business Law, Family Law, Litigation.

JUSTIN TOWNSEND, born Provo, Utah, April 29, 1981, admitted to bar, 2011, Nevada, 2010, Texas. Education: Brigham Young University (B.A. Communications, 2006); J. Reuben Clark Law School of Brigham Young University (J.D., 2010). Member: First Judicial District, Ninth Judicial District, Washoe County and American Bar Association; State Bar of Nevada. Practice Areas: Business Formation, Business Law, Water Rights Law, Administrative Law, Commercial Transactions, Environmental Law, Public Utilities Law, Energy.

OF COUNSEL

GEORGE V. ALLISON, born Denver, Colorado, August 1, 1938; admitted to bar, 1963, Nevada; 1972, U.S. Supreme Court and U.S. Court of Appeals, Ninth Circuit. Education: University of Nevada (B.A., 1960); Hastings College of Law, University of California (LL.B., 1963). Phi Alpha Delta. Member: Washoe County, First Judicial District Bar Associations; State Bar of Nevada; Defense Research and Trial Lawyers Association; American Inns of Court. Practice Areas: Insurance Defense Law, Trial Practice, Accident and Personal Injury, Environmental Law, including chemical exposure.

PATRICK V. FAGAN, born New York, N.Y., March 30, 1945; admitted to bar, 1973, Nevada; 1974, U.S. District Court, District of Nevada. Education: University of Nevada (B.A., 1969); University of San Diego (J.D., 1973). Phi Alpha Theta. Deputy Commissioner, Nevada Public Service Commission, 1979-1981; Nevada Minerals Resources Commission (1999--); Judge Pro Tem, Douglas County Tahoe Justice Court; State Bar of Nevada, Northern Nevada Disciplinary Board (Member 1998-) (Vice Chairman 2001-2002) (Chairman 2002-2006), Fee Dispute Committee (2000-). Member: Washoe County, First Judicial District and American Bar Associations; State Bar of Nevada; Transportation Lawyers Association; Geothermal Resources Council. Special Agencies: Public Utilities Commission; Department of Water Resources; Transportation Services Authority. Practice Areas: Public Utilities, Transportation Law, Environmental Law, Administrative Law.

CHARLES P. COCKERILL, born Pasadena, California, June 21, 1950; admitted to bar, 1979, California (inactive), 1980, Nevada; University of California, Santa Barbara (B.A. Political Science, 1972); California Western School of Law (J.D., 1979); Law Clerk, Honorable Michael Griffin, First Judicial District Court, 1979-1980; [Captain, U.S. Army, 1972-1976; Deputy Attorney General, Criminal Division, Nevada Attorney General, 1980-1981; Chief Deputy District Attorney, Carson City District Attorney, 1981-1991; Law Office of Charles P. Cockerill, Prof. LLC, 1992-2014]. Practice Area: Labor and Employment Law in Private and Public Sectors.

JOAN C. WRIGHT, born Pasadena, California, October 1, 1952; admitted to bar, 1978, California and U.S. District Court, Eastern District of California; 1979, Nevada and U.S. District Court, District of Nevada; 1986, U.S. District Court, Northern District of California. Education: University of California at Berkeley (B.A., 1973); University of the Pacific, McGeorge School of Law (J.D., 1978). Member: Washoe County and First Judicial District (Vice-President, 1985; President, 1986) Bar Associations; State Bar of Nevada; State Bar of California; Nevada Women Lawyers (President, 1982); Volunteer Attorneys for Rural Nevadans (President, 1997-2000); University of Nevada, Reno Women's Athletic Association (Pack Paws) (President, 2000-2002), Sierra Nevada Chapter California Dressage Society (Board, 2000-). Practice Areas: Real Estate Title, Resort Timeshares, Condominium Association Law, Secured Collections, Quiet Title, Unsecured Collections, Bankruptcy Law, Business Entities.

REPRESENTATIVE CLIENTS: American Express; Boeing North America, Inc. (Rocketdyne Division); Carriage House Timeshare Association; Carson Medical Group, Carson Nugget, Inc.; Clayton Foundation for Medical Research, Inc.; Dayton Valley Country Club; Esmeralda County School District; Eureka County School District; Geo Energy Partners; Conrad N. Hilton Foundation; K-T Contract Services, Inc.; Lumos and Associates; Nevada Geothermal Power, Inc.; Northern Nevada Industrial Gas Users; Research Development Foundation; Resorts West; R. L. Shaheen Company; R. O. Anderson Engineering; Rural Telephone Company; Sierra Surgery Hospital; Storey County; Sunridge Corporation; Vidler Water Company; Verizon California Inc., dba Verizon Nevada; Washoe County Utility Division.

GENERAL COUNSEL FOR: Carson City School District; Capital City Entertainment; Carson Tahoe Regional Healthcare; Douglas County Sewer Improvement District; Nevada State Board of Accountancy; Nevada State Board of Engineers; Round Hill General Improvement District; United States Board of Water Commissioners Walker River; The Town of Minden, Nevada.

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KAREN A. PETERSON

Karen Peterson joined the law offices of Allison MacKenzie in 1983. Her areas of practice are public utility law, telecommunications law, water law, administrative law, litigation and business law.

Karen Peterson graduated with a law degree from the University of North Carolina at Chapel Hill in 1982. Upon graduation, she was admitted to practice law in Nevada as well as the U.S. District Court, District of Nevada in 1983. She appears before the Department of Water Resources, Public Utilities Commission of Nevada, Department of Taxation and Division of Environmental Protection. Her professional organization involvement includes Carson City Justice and Municipal Courts, Judge Pro Tem, memberships with the Washoe County Bar Association and First Judicial Bar Association, State Bar of Nevada, Northern Nevada Lawyer's Association, and Soroptomist International of Carson City. She is AV® Distinguished Peer Review Rated by Martindale Hubbell.



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Experience/Admissions

- Admitted to Practice, Nevada 1982
- Admitted to Practice, U.S. District Court, District of Nevada, 1983
- Admitted to Practice, U.S. Court of Appeals, Ninth Circuit, 2007
- Carson City Justice and Municipal Courts, Judge Pro Tem, 1999-present

Professional Associations & Leadership

- Washoe County Bar Association
- First Judicial Bar Association
- State Bar of Nevada
- Northern Nevada Lawyer's Association
- Phi Beta Kappa
- Mortar Board, President of MSU Chapter, 1978-1979

Community Leadership

- Soroptomist International of Carson City
- Education.
- B.S., Michigan State University, 1979
- J.D., University of North Carolina at Chapel Hill, 1982

Practice Areas

Administrative Law
Public Utilities Law
Telecommunications Law
Water Rights Law
Appellate Law
Energy Law
Environmental Law
Litigation
Business Law
Construction Law
Real Estate Law



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JENNIFER MCMENOMY

Jennifer McMenemy joined Allison MacKenzie as an associate in 2018. She is a graduate of the University of Nevada-Reno and obtained her law degree at Western State University College of Law. She was admitted to the State Bar of California in 2015 and to the State Bar of Nevada in 2016.

A Carson City native, Jennifer served as a Policy Analyst for the 2015 Nevada State Legislature – State Assembly. She was also employed as a Government and Regulatory Affairs Analyst for a solar energy company and worked as an attorney in the Bay Area before deciding to return to her hometown.

Experience/Admissions

Admitted to Practice, Nevada, 2016
Admitted to Practice, California, 2015

Professional Associations & Leadership

State Bar of Nevada
State Bar of California
Washoe County Bar Association

Community Leadership

Washoe County Senior Services Advisory Board, 2019 – present
Carson High School Mock Trial Team Mentor, 2018
State Bar of Nevada Goldilocks Program Mentor, 2016 – present
"We the People" Mentor, 2016 – present

Education

B.A., English and Political Science, University of Nevada, Reno, 2010
J.D., Western State College of Law, 2014

Practice Areas

Administrative Law
Business Law
Energy Law
Family Law



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DANIEL S. JUDD

Daniel S. Judd joined Allison MacKenzie as an associate in 2019. A Nevada native, he graduated from the University of Nevada, Reno in 2013 with a Bachelor of Science Degree in Criminal Justice - Pre-Law. In 2017, Daniel obtained his Doctor of Jurisprudence Degree from the University of Wyoming College of Law. In 2018, he was admitted to practice in Nevada. Daniel's areas of practice include family law, divorce, guardianships and estate planning.

Daniel is a former law clerk for both Allison MacKenzie and the Honorable James T. Russell, District Court Judge of the First Judicial District Court in Carson City. Additionally, he served the community as a Deputy Sheriff in Carson City.

Experience/Admissions

Admitted to Practice, Nevada, 2018

Professional Associations & Leadership

State Bar of Nevada

Washoe County Bar Association

Education

B.S., Criminal Justice - Pre-Law, University of Nevada, Reno, 2013

J.D., University of Wyoming College of Law, 2017

Practice Areas

Family Law

Guardianships

Divorce

Estate Planning



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EMILY MEIBERT

Emily Meibert is a Northern Nevada Native and a graduate of the University of Nevada. Emily returned to Northern Nevada after graduating from the Boyd Law School in Las Vegas. She has been admitted to practice law in Nevada, California, and the District of Columbia. Prior to joining Allison MacKenzie, Emily was a Judicial Law Clerk to the Honorable James E. Wilson, Jr., with the First Judicial District Court in Carson City, Nevada. Emily is an associate attorney focusing on litigation, estate planning, and real estate law.

Passionate about her community, Emily continuously volunteers her time and effort to local organizations and businesses—including volunteering with the local Foodbank, coaching high school mock trial, and supporting the local Alzheimer's Awareness organizations. In her free time, Emily enjoys exploring new foods and visits a different local restaurant every week. She also enjoys reading and started a book club with other young female professionals in the area.



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Experience/Admissions

Admitted to Practice, Nevada, 2020

Admitted to Practice, California, 2021

Admitted to Practice, District of Columbia, 2021

Admitted to Practice, U.S. District Court, District of Nevada, 2020

Admitted to Practice, U.S. Court of Appeals, Ninth Circuit, 2021

Law Clerk to the Honorable James E. Wilson, Jr., First Judicial District Court, 2019-2020

Professional Associations & Leadership

Nevada State Bar, Young Lawyers Section

Northern Nevada Women Lawyers Association

Nevada Justice Association, Club X Committee Member

First Judicial District Bar Association

American Bar Association

Washoe County Bar Association

Community Leadership

<https://allisonmackenzie.com/attorneys/emily-meibert/>

WIM - The Water in Motion, Executive Board Member

High School Mock Trial, Coach

Alzheimer's Awareness, Volunteer and Promoter

Food Bank of Northern Nevada, Volunteer

Big Brothers Big Sisters of Northern Nevada, Young Professionals Committee Member

Awards & Recognition

Legal Elite, Nevada Business Magazine, 2021 & 2022

Education

B.A., Criminal Justice, Pre-Law, University of Nevada, Reno, 2015

J.D., University of Nevada, Las Vegas, William Boyd School of Law, 2019

Practice Areas

Administrative Law

Business Entity Formation

Civil Litigation

Estate Planning

Landlord Tenant Disputes

Real Estate Law



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