

EXHIBIT 15

EXHIBIT 15

SUPP

JAMES J. JIMMERSON, ESQ.
Nevada Bar No. 000264
LYNN M. HANSEN, ESQ.
Nevada Bar No. 0244
JAMES M. JIMMERSON, ESQ.
Nevada Bar No. 12599
JIMMERSON HANSEN, P.C.
415 So. Sixth St., Ste. 100
Las Vegas, NV 89101
Tel No.: (702) 388-7171; Fax No.: (702) 380-6406
jjj@jimmersonhansen.com
lmh@jimmersonhansen.com
jmj@jimmersonhansen.com
Attorney for Plaintiffs
James Wolfram and Walt Wilkes

**DISTRICT COURT
CLARK COUNTY, NEVADA**

JAMES WOLFRAM AND WALT WILKES

Plaintiffs,

vs.

PARDEE HOMES OF NEVADA,

Defendant.

CASE NO.: A-10-632338-C
DEPT NO.: IV

**PLAINTIFFS' TWELFTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF
WITNESSES AND DOCUMENTS**

COME NOW Plaintiffs, JAMES WOLFRAM and WALT WILKES, by and through their attorneys, Lynn M. Hansen, Esq., and James M. Jimmerson, Esq., of the law firm of Jimmerson Hansen, P.C., and hereby submit the following Twelfth Supplement to their list of witnesses and production of documents, as follows (*new items in bold*):

///

///

///

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1167

I.
WITNESSES

Plaintiffs provide the following witnesses' identities, last known address and telephone numbers:

1. James Wolfram
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

2. Walt Wilkes
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

3. Frances Butler Dunlap
Chicago Title Company
Las Vegas, Nevada

This person was the head of the Real Estate Commercial Department of Chicago Title Company, is most knowledgeable, and is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

4. PARDEE HOMES OF NEVADA
Custodian of Records
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89501
(775) 788-2000

Pardee Homes of Nevada is a named Defendant in this matter. Its present or former employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6) and/or custodians of records are expected to testify regarding the facts and background of this case.

- 1 5. PARDEE HOMES OF NEVADA
2 Person Most Knowledgeable
3 McDonald Carano Wilson LLP
4 100 West Liberty Street, 10th Floor
5 Reno, Nevada 89501
6 (775) 788-2000

7 Pardee Homes of Nevada is a named Defendant in this matter. Its present or former
8 employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6)
9 and/or Person Most Knowledgeable are expected to testify regarding the facts and background
10 of this case.

- 11 6. Jon Lash
12 c/o McDonald Carano Wilson LLP
13 100 West Liberty Street, 10th Floor
14 Reno, Nevada 89501
15 (775) 788-2000

16 Mr. Lash is an employee of PARDEE HOMES OF NEVADA and is expected to testify
17 regarding the facts and background of this case.

- 18 7. Clifford Anderson
19 c/o McDonald Carano Wilson LLP
20 100 West Liberty Street, 10th Floor
21 Reno, Nevada 89501
22 (775) 788-2000

23 Mr. Anderson is an employee of PARDEE HOMES OF NEVADA and is expected to
24 testify regarding the facts and background of this case.

- 25 8. Harvey Whitmore
26 c/o Coyote Springs
27 Address Unknown

28 Mr. Whitmore is the owner of the property involved in this lawsuit and is expected to
testify regarding the facts and background of this case.

9. Chicago Title Company
Las Vegas, Nevada
Custodian of Records

The Custodian of Records is expected to testify regarding the facts and background of
this case.

10. Chicago Title Company
Las Vegas, Nevada
Person Most Knowledgeable

1 The Person Most Knowledgeable is expected to testify regarding the facts and
2 background of this case.

- 3
4 11. Peter J. Dingerson
D&W Real Estate
5455 S. Durango Dr., Ste 160
5 Las Vegas, NV 89113

6 Mr. Dingerson is the owner of D&W Real Estate and is expected to testify regarding the
7 facts and background of this case.

- 8 12. Jay Dana
General Realty Group
6330 S. Eastern Ave Ste 2
9 Las Vegas, NV 89119

10 Mr. Dana is the owner of General Realty Group Inc. and is expected to testify regarding
11 the facts and background of this case.

- 12 13. Jerry Masini
Award Realty Corp.
3015 S. Jones Blvd.
14 Las Vegas, NV 89146

15 Mr. Masini is the owner of Award Realty and is expected to testify regarding the
16 facts and background of this case.

- 17 14. Mark Carmen
Exit Realty Number One
6600 W. Charleston, Suite #119
18 Las Vegas, Nevada 89146

19 Mr. Carmen is the owner of Las Vegas Realty Center and is expected to testify
20 regarding the facts and background of this case.

- 21
22 15. James J. Jimmerson, Esq.
C/O JIMMERSON HANSEN, PC
23 415 South Sixth Street #100
Las Vegas, Nevada 89101

24 Mr. Jimmerson is a principal of Jimmerson Hansen, P.C and is expected to
25 testify regarding Plaintiffs' attorney's fees and costs.

26
27 Plaintiffs reserve the right to call any and all witnesses who may be disclosed or
28 deposed throughout the course of discovery.

1 Plaintiffs reserve the right to call any and all of Defendant's witnesses; and
2 Plaintiffs reserve the right to call any and all rebuttal witnesses.
3 Plaintiffs' experts, if any, as yet unidentified.
4 Plaintiffs reserve the right to supplement this list of witnesses as discovery
5 progresses and until the time of trial in this case.

6 II.

7 DOCUMENTS

8 Pursuant to NRCP 16.1(a)(1)(B), Plaintiffs provide the following documents relating to
9 Plaintiffs and Defendants:

- 10 1. Any and all written agreements between the Parties;
- 11 2. Any and all documents evidencing damages to the Plaintiffs;
- 12 3. Any and all correspondence between the Parties;
- 13 4. Any and all appropriate Custodian of Record documents;
- 14 5. Any and all pleadings in this matter;

15 These documents are being reproduced as Plaintiffs' Initial NRCP 16.1 Disclosures of
16 Witnesses and Documents had duplicate documents. The duplicate copies have been
removed and the documents are listed as follows:

- 17 1. Option Agreement for the Purpose of Real Property and Joint Escrow
18 Instructions dated May 2004 (Bates No. PLTF0001-0080);
- 19 2. Amended and Restated Option Agreement for the Purchase of Real Property
20 and Joint Escrow Instructions dated March 28, 2005, (Bates No. PLTF0081-
21 0152);
- 22 3. Two Assignments of Real Estate Commission and Personal Certification
23 Agreement (Bates No. PLTF0153-0157A)
- 24 4. Letter dated September 2, 2004 from Pardee Homes to Mr. Walt Walkes
25 regarding the attached Commission letter dated September 1, 2004, (Bates No.
26 PLTF0158-0162);
- 27 5. Amendment No. 2 to Option Agreement for the Purchase of Real Property and
28 Joint Escrow Instructions, (Bates No. PLTF0163-0174);
6. Letter dated April 6, 2009 from Pardee Homes to Mr. Jim Wolfram, (Bates No.
PLTF0175-0179);
7. Letter dated April 23, 2009 from James J. Jimmerson, Esq., to Jim Stringer,
Esq., (Bates No. PLTF0180-0187);
8. Letter dated May 19, 2011 from James J. Jimmerson, Esq., to Jim Stringer,
Esq., (Bates No. PLTF0188-0191);

- 1 9. Letter dated July 10, 2009 from Charles E. Curtis to James J. Jimmerson, Esq.,
2 (Bates No. PLTF0192-0193);
- 3 10. Letter dated August 26, 2009 from James J. Jimmerson, Esq., to Charles E.
4 Curtis, (Bates No. PLTF0194-0196);
- 5 11. Letter dated November 24, 2009 from Jon E. Lash to Mr. Jim Wolfram, (Bates
6 No. PLTF0197-0202);
- 7 12. Letter dated April 21, 2010 from Jim Wolfram to Mr. Jon Lash, (Bates No.
8 PLTF0203-0205);
- 9 13. Letter dated May 17, 2010 from James J. Jimmerson, Esq., to Mr. John E. Lash,
10 (Bates No. PLTF0206-0209);
- 11 14. Letter dated June 14, 2010 from Charles E. Curtis to James J. Jimmerson, Esq.,
12 (Bates No. PLTF0210-0211);
- 13 15. Bates Nos. PLTF0212-0244 are the duplicative documents produced in
14 Plaintiffs' Initial 16.1 Disclosure of Documents and Witnesses.
- 15 16. Documents produced by Stewart Title in response to Plaintiffs' Subpoena Duces
16 Tecum on CD, (Bates No. PLTF0245-PLTF1423);
- 17 17. Documents produced by Chicago Title in response to Plaintiffs' Subpoena
18 Duces Tecum on CD, (Bates No. PLTF1424-PLTF10414);
- 19 18. Documents produced by Coyote Springs Investments in response to Plaintiff's
20 Duces Tecum on CD, (Bates No. CSI_Wolfram 000014 -
21 CSI_Wolfram0003004), attached hereto;
- 22 19. Coyote Springs Investment, LLC's Privilege Log, (Bates No. PLTF10415 -
23 PLTF10417), attached hereto;
- 24 20. Affidavit of Custodian of Records, (Bates No. PLTF10418-PLTF10419); attached
25 hereto;
- 26 21. Non-Party Coyote Springs Investments, LLC's Supplement and Amended
27 Objection and Response to Plaintiff's Subpoena Duces Tecum, (Bates
28 PLTF10420-PLTF10424, attached hereto.
- 23 22. Chicago Title Company's previously bates stamped documents no. PLTF 1424
24 through PLTF 10414 (on bottom right of documents bates stamped) and rebated
25 as bates nos: Cht 00001 through Cht 08998 (on bottom left of documents bates
26 stamped), including the Custodian of Records Subpoena to Chicago Title
27 Company including the executed Certificate of Custodian of Records bates
28 stamped as Cht 08997.
- 23 23. Stewart Title Company's previously bates stamped documents no. PLTF 0245
24 through PLTF 1423 and rebated as bates nos: Stwt 0001 through 1202.
25 Documents Stwt 0699 and Stwt 0731 are copy coversheets and were
26 inadvertently bates stamped.
- 27 24. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 138,
28 page 51, bates PLTF 10427 through PLTF 10438.
- 25 25. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 116,

- 1 page 35, bates PLTF 10439 through PLTF 10440.
- 2 26. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 117,
- 3 page 18, bates PLTF 10441 through PLTF 10443.
- 4 27. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 140,
- 5 page 57, bates PLTF 10444 through PLTF 10456.
- 6 28. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 113,
- 7 page 55, bates PLTF 10457 through PLTF 10462.
- 8 29. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 98,
- 9 page 57, bates PLTF 10463 through PLTF 10468.
- 10 30. Copy of redacted billing sheets representing attorney's fees charged by
- 11 Jimmerson Hansen, P.C. from November 3, 2010 through October 19, 2012,
- 12 bates PLTF 10469 through PLTF 10481.
- 13 31. Affidavit of Peter J. Dingerson, bates PLTF 10482 through PLTF 10484.
- 14 32. Assignment of Rights, Title and Interest from Jay Dana on behalf of General
- 15 Realty Group Inc. to Walt Wilkes, dated January 11, 2011, bates PLTF 10485.
- 16 33. Assignment of Rights, Title and Interest from Jerry Masini on behalf of Award
- 17 Realty to James Wolfram, dated December 20, 2010, bates PLTF 10486.
- 18 34. Letter from Jeffrey King, M.D. dated November 1, 2011 regarding the health of
- 19 Walt Wilkes, bates PLTF 10487.
- 20 35. Affidavit of Jerry Masini, bates PLTF 10488 through PLTF 10490.
- 21 36. Assignment signed by Mark Carmen dated December 3, 2012 along with Exhibit
- 22 A signed by Jay Dana dated January 11, 2011, attached hereto as bates PLTF
- 23 10491 through PLTF 10493; and
- 24 37. Assignment signed by Peter J. Dingerson dated December 20, 2012 along with
- 25 Exhibit A signed by Jerry Masini dated December 20, 2010, attached hereto as
- 26 bates PLTF 10494 through PLTF 10496.
- 27 38. Copy of redacted billing sheets representing attorney's fees charged by
- 28 Jimmerson Hansen, P.C. from October 24, 2012 through February 21, 2013,
- bates PLTF 10497 through PLTF 10499.
39. Copy of redacted costs representing costs expended by Jimmerson Hansen,
- P.C. from December 29, 2010 through February 4, 2013 bates PLTF 10500
- through PLTF 10505.
40. Copy of redacted billing sheets representing attorney's fees charged by
- Jimmerson Hansen, P.C. from February 21, 2013 through March 29, 2013,
- bates PLTF 10506 through PLTF 10508.
41. Copy of redacted costs representing costs expended by Jimmerson Hansen,
- P.C. from February 27, 2013 through March 13, 2013 bates PLTF 10509
- through 10510.
42. Copy of redacted billing sheets representing attorney's fees charged by
- Jimmerson Hansen, P.C. from April 1, 2013 through April 18, 2013, bates PLTF

10511 through PLTF 10512.

43. Color copy of the map as edited by James Wolfram, attached hereto as bates PLTF 10513.
44. Color copy the original map from Jon Lash to James Wolfram of the entire site, attached hereto as bates PLTF 10514.
45. Three (3) color copies of maps from James Wolfram to Jon Lash, originally produced by your office on April 21, 2010, attached hereto as bates PLTF 10515-10517; and
46. A further detailed computation of the attorney fee damages is found at Exhibit "1" attached hereto. Exhibit "1" is a collection of the previously produced attorney's fees with the highlighted sections representing the line items which were aggregated at 100% plus the non-highlighted line items which were aggregated at 33.3% to equal \$102,160.00. The pink highlighted line items represent those damages for a breach of contract and breach of the implied covenant of good faith and fair dealing claims, which total \$7,602.50.
47. Emails dated from September 2008 between Nevada Title and Plaintiffs with their attachments (commercial sales and parcels designated for the upcoming BLM land action from Nevada Tile), attached hereto as bates PLTF 10518-10527.
48. **Computation of attorneys fees and billing from April 22, 2013 through May 21, 2013, attached hereto as bates PLTF 10528 through 10530.**
49. **Computation of attorneys fees and billing from May 20, 2013 through June 20, 2013, attached hereto as bates PLTF 10531 through 10533.**

Plaintiffs reserve the right to any and all documents the Defendants disclosed by any parties or used at any depositions.

Plaintiffs reserve the right to any and all other relevant documents to this matter.

Plaintiffs reserve the right to identify and produce different and/or additional documents as the investigation and discovery in this case proceeds.

III.

COMPUTATION OF DAMAGES

Plaintiffs calculate their damages to be in excess of **\$1,930,000.00** associated with the Defendant's breach of contract and the Defendant's failure to faithfully meet their obligations to the Plaintiffs.

There are two primary components to this calculation. The first component is the loss of future commissions from future sales or takedowns of property located in Clark County, subject to the September 1, 2004 Commission Letter Agreement. There appears to be at least

1 3,000 acres of property, defined as Option Property under the Option Agreement effective
2 June 1, 2004, currently owned by Coyote Springs Investment, LLC in Township 13 South,
3 Range 63 East M.D.M., Clark County, Nevada. Under the Option Agreement effective June
4 1, 2004, these 3,000 acres can be purchased by Pardee and designated as Production
5 Residential Property—a purchase and designation that would entitle Plaintiffs to a 1.5%
6 commission on a per-acre price of \$40,000.00. If 3,000 acres were purchased by Pardee
7 under this scenario, Plaintiffs would be entitled to \$1,800,000 in commissions. However,
8 Pardee's course of conduct in failing to appropriately discharge its duties under the
9 Commission Letter Agreement has robbed Plaintiffs of this opportunity to be paid these
10 commissions. Pardee's actions have served to reclassify the land originally labeled as
11 Purchase Property and Option Property, and under the new reclassification, all Option
12 Property has been removed from Clark County, thereby divesting Plaintiffs of any hope to
13 collect any part of the \$1.8 million in commissions they could be paid had no reclassification
14 occurred.

15 The second component of this calculation is attorney's fees. Plaintiffs' attorney's fees
16 and costs currently exceed \$146,000.00. This amount represents all work from the date of
17 drafting of the Complaint in November 2010 through April 20, 2013. Plaintiffs' attorney's fees
18 and costs constitute damages pursuant to the September 1, 2004 Commission Letter
19 Agreement. As stated in the Agreement, "In the event, either party brings an action to enforce
20 its rights under this Agreement, the prevailing party shall be awarded reasonable attorneys'
21 fees and costs." Plaintiffs in bringing this suit expect to be the prevailing party and, as such,
22 are entitled to their reasonable attorney's fees as damages for Defendant's breach of contract,
23 breach of the covenant of good faith and fair dealing, and for compelling the accounting due
24 to Plaintiffs.

25 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
26 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
27 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
28 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for
accounting, and seeking documents owed to Plaintiffs under the September 1, 2004

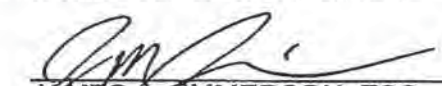
1 Commission Letter Agreement (for the breach of contract and breach of the covenant of good
2 faith and fair dealing claims) plus one-third of the fees and costs incurred for the prosecution
3 of all of the claims (as one of the three claims is for an accounting for which all of Plaintiffs'
4 fees are damages). Exempt from the damages are fees in connection with the prosecution
5 of the breach of contract and breach of the implied covenant of good faith and fair dealing
6 claims, specifically not in furtherance of the recovery of documents. To date, Plaintiffs'
7 attorney fee damages are greater than or equal to: **\$135,486.87**. Specifically, Plaintiffs'
8 attorney fee damages for the accounting claim equal or exceed **\$135,486.87**; for the claim for
9 the breach of contract equal or exceed \$7,602.50; and for the claim for the breach of the
10 implied covenant of good faith and fair dealing claims equal or exceed \$7,602.50.

11 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
12 discover from public records what information was owed to them under the Commission Letter
13 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
14 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
15 \$6,400.00 for their time.

16 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
17 supplement this response as the investigation and discovery in this case proceeds.

18 Dated this 19TH day of July, 2013.

19 JIMMERSON HANSEN, P.C.

20
21 
22 JAMES M. JIMMERSON, ESQ.
23 Nevada Bar No. 000264
24 LYNN M. HANSEN, ESQ.
25 Nevada Bar No. 0244
26 JAMES M. JIMMERSON, ESQ.
27 Nevada Bar No. 12599
28 415 So. Sixth St., Ste. 100
Las Vegas, NV 89101
Attorney for Plaintiffs
James Wolfram and Walt Wilkes

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 • Facsimile (702) 387-1167

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of PLAINTIFFS' TWELFTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS was made on the 19th day of July, 2013, as indicated below:

☒ By first class mail, postage prepaid from Las Vegas, Nevada pursuant to N.R.C.P. 5(b) addressed as follows below

☐ By electronic service through the E-filing system

☐ By facsimile, pursuant to EDCR 7.26

☐ By receipt of copy as indicated below

PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
McDONALD CARANO WILSON, LLP
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada


An Employee of JIMMERSON HANSEN, P.C.

REDACTED

REDACTED

Bench Trial
3 day trial

Kerry Earley as Judge
at 10 AM
May 13 to 17th

REDACTED

REDACTED

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1167

1 **SUPP**
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2 Nevada Bar No. 000264
LYNN M. HANSEN, ESQ.
3 Nevada Bar No. 0244
JAMES M. JIMMERSON, ESQ.
4 Nevada Bar No. 12599
JIMMERSON HANSEN, P.C.
5 415 So. Sixth St., Ste. 100
Las Vegas, NV 89101
6 Tel No.: (702) 388-7171; Fax No.: (702) 380-6406
jjj@jimmersonhansen.com
7 lmh@jimmersonhansen.com
jmj@jimmersonhansen.com
8 Attorney for Plaintiffs
James Wolfram and Walt Wilkes
9

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 JAMES WOLFRAM AND WALT WILKES) **CASE NO.: A-10-632338-C**
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14 vs.)
15 PARDEE HOMES OF NEVADA,)
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I.

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Chicago Title Company
Las Vegas, Nevada

This person was the head of the Real Estate Commercial Department of Chicago Title Company, is most knowledgeable, and is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

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28 Mr. Whitmore is the owner of the property involved in this lawsuit and is expected to
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16 Award Realty Corp.
17 3015 S. Jones Blvd.
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22 Exit Realty Number One
23 6600 W. Charleston, Suite #119
24 Las Vegas, Nevada 89146

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15. Bates Nos. PLTF0212-0244 are the duplicative documents produced in Plaintiffs' Initial 16.1 Disclosure of Documents and Witnesses.
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19. Coyote Springs Investment, LLC's Privilege Log, (Bates No. PLTF10415 - PLTF10417), attached hereto;
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22. Chicago Title Company's previously bates stamped documents no. PLTF 1424 through PLTF 10414 (on bottom right of documents bates stamped) and rebated as bates nos: Cht 00001 through Cht 08998 (on bottom left of documents bates stamped), including the Custodian of Records Subpoena to Chicago Title Company including the executed Certificate of Custodian of Records bates stamped as Cht 08997.
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- 2 26. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 117,
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- 21 36. Assignment signed by Mark Carmen dated December 3, 2012 along with Exhibit
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- 26 bates PLTF 10494 through PLTF 10496.
- 27 38. Copy of redacted billing sheets representing attorney's fees charged by
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10511 through PLTF 10512.

43. Color copy of the map as edited by James Wolfram, attached hereto as bates PLTF 10513.
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46. A further detailed computation of the attorney fee damages is found at Exhibit "1" attached hereto. Exhibit "1" is a collection of the previously produced attorney's fees with the highlighted sections representing the line items which were aggregated at 100% plus the non-highlighted line items which were aggregated at 33.3% to equal \$102,160.00. The pink highlighted line items represent those damages for a breach of contract and breach of the implied covenant of good faith and fair dealing claims, which total \$7,602.50.
47. Emails dated from September 2008 between Nevada Title and Plaintiffs with their attachments (commercial sales and parcels designated for the upcoming BLM land action from Nevada Tile), attached hereto as bates PLTF 10518-10527.
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COMPUTATION OF DAMAGES

Plaintiffs calculate their damages to be in excess of **\$1,930,000.00** associated with the Defendant's breach of contract and the Defendant's failure to faithfully meet their obligations to the Plaintiffs.

There are two primary components to this calculation. The first component is the loss of future commissions from future sales or takedowns of property located in Clark County, subject to the September 1, 2004 Commission Letter Agreement. There appears to be at least

1 3,000 acres of property, defined as Option Property under the Option Agreement effective
2 June 1, 2004, currently owned by Coyote Springs Investment, LLC in Township 13 South,
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5 Residential Property—a purchase and designation that would entitle Plaintiffs to a 1.5%
6 commission on a per-acre price of \$40,000.00. If 3,000 acres were purchased by Pardee
7 under this scenario, Plaintiffs would be entitled to \$1,800,000 in commissions. However,
8 Pardee's course of conduct in failing to appropriately discharge its duties under the
9 Commission Letter Agreement has robbed Plaintiffs of this opportunity to be paid these
10 commissions. Pardee's actions have served to reclassify the land originally labeled as
11 Purchase Property and Option Property, and under the new reclassification, all Option
12 Property has been removed from Clark County, thereby divesting Plaintiffs of any hope to
13 collect any part of the \$1.8 million in commissions they could be paid had no reclassification
14 occurred.

15 The second component of this calculation is attorney's fees. Plaintiffs' attorney's fees
16 and costs currently exceed \$146,000.00. This amount represents all work from the date of
17 drafting of the Complaint in November 2010 through April 20, 2013. Plaintiffs' attorney's fees
18 and costs constitute damages pursuant to the September 1, 2004 Commission Letter
19 Agreement. As stated in the Agreement, "In the event, either party brings an action to enforce
20 its rights under this Agreement, the prevailing party shall be awarded reasonable attorneys'
21 fees and costs." Plaintiffs in bringing this suit expect to be the prevailing party and, as such,
22 are entitled to their reasonable attorney's fees as damages for Defendant's breach of contract,
23 breach of the covenant of good faith and fair dealing, and for compelling the accounting due
24 to Plaintiffs.

25 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
26 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
27 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
28 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for
accounting, and seeking documents owed to Plaintiffs under the September 1, 2004


1 Commission Letter Agreement (for the breach of contract and breach of the covenant of good
2 faith and fair dealing claims) plus one-third of the fees and costs incurred for the prosecution
3 of all of the claims (as one of the three claims is for an accounting for which all of Plaintiffs'
4 fees are damages). Exempt from the damages are fees in connection with the prosecution
5 of the breach of contract and breach of the implied covenant of good faith and fair dealing
6 claims, specifically not in furtherance of the recovery of documents. To date, Plaintiffs'
7 attorney fee damages are greater than or equal to: **\$135,486.87**. Specifically, Plaintiffs'
8 attorney fee damages for the accounting claim equal or exceed **\$135,486.87**; for the claim for
9 the breach of contract equal or exceed \$7,602.50; and for the claim for the breach of the
10 implied covenant of good faith and fair dealing claims equal or exceed \$7,602.50.

11 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
12 discover from public records what information was owed to them under the Commission Letter
13 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
14 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
15 \$6,400.00 for their time.

16 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
17 supplement this response as the investigation and discovery in this case proceeds.

18 Dated this 19TH day of July, 2013.

19 JIMMERSON HANSEN, P.C.

20
21 
22 JAMES M. JIMMERSON, ESQ.
23 Nevada Bar No. 000264
24 LYNN M. HANSEN, ESQ.
25 Nevada Bar No. 0244
26 JAMES M. JIMMERSON, ESQ.
27 Nevada Bar No. 12599
28 415 So. Sixth St., Ste. 100
Las Vegas, NV 89101
Attorney for Plaintiffs
James Wolfram and Walt Wilkes

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1107

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of PLAINTIFFS' TWELFTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS was made on the 19th day of July, 2013, as indicated below:

☒ By first class mail, postage prepaid from Las Vegas, Nevada pursuant to N.R.C.P. 5(b) addressed as follows below

By electronic service through the E-filing system

By facsimile, pursuant to EDCR 7.26

By receipt of copy as indicated below

PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
McDONALD CARANO WILSON, LLP
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada


An Employee of JIMMERSON HANSEN, P.C.

REDACTED

REDACTED

Bench Trial
3 day trial

Kerry Earley as Judge
at 10 AM
May 13 to 17th

REDACTED

REDACTED

PLTF10531

JA008887

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 • Facsimile (702) 387-1167

1 **SUPP**
2 JAMES J. JIMMERSON, ESQ.
3 Nevada Bar No. 000264
4 LYNN M. HANSEN, ESQ.
5 Nevada Bar No. 0244
6 JAMES M. JIMMERSON, ESQ.
7 Nevada Bar No. 12599
8 JIMMERSON HANSEN, P.C.
9 415 So. Sixth St., Ste. 100
10 Las Vegas, NV 89101
11 Tel No.: (702) 388-7171; Fax No.: (702) 380-6406
12 jij@jimmersonhansen.com
13 lmh@jimmersonhansen.com
14 imj@jimmersonhansen.com
15 Attorney for Plaintiffs
16 *James Wolfram and Walt Wilkes*

DISTRICT COURT
CLARK COUNTY, NEVADA

12	JAMES WOLFRAM AND WALT WILKES	}	CASE NO.: A-10-632338-C DEPT NO.: IV
13	Plaintiffs,		
14	vs.		
15	PARDEE HOMES OF NEVADA,		
16	Defendant.		

PLAINTIFFS' TWELFTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF
WITNESSES AND DOCUMENTS

19 COME NOW Plaintiffs, JAMES WOLFRAM and WALT WILKES, by and through their
20 attorneys, Lynn M. Hansen, Esq., and James M. Jimmerson, Esq., of the law firm of
21 Jimmerson Hansen, P.C., and hereby submit the following Twelfth Supplement to their list of
22 witnesses and production of documents, as follows (*new items in bold*):

23 ///

24 ///

25 ///

I.

WITNESSES

Plaintiffs provide the following witnesses' identities, last known address and telephone numbers:

1. James Wolfram
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

2. Walt Wilkes
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

3. Frances Butler Dunlap
Chicago Title Company
Las Vegas, Nevada

This person was the head of the Real Estate Commercial Department of Chicago Title Company, is most knowledgeable, and is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

4. PARDEE HOMES OF NEVADA
Custodian of Records
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89501
(775) 788-2000

Pardee Homes of Nevada is a named Defendant in this matter. Its present or former employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6) and/or custodians of records are expected to testify regarding the facts and background of this case.

- 1 5. PARDEE HOMES OF NEVADA
2 Person Most Knowledgeable
3 McDonald Carano Wilson LLP
4 100 West Liberty Street, 10th Floor
5 Reno, Nevada 89501
6 (775) 788-2000

7 Pardee Homes of Nevada is a named Defendant in this matter. Its present or former
8 employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6)
9 and/or Person Most Knowledgeable are expected to testify regarding the facts and background
10 of this case.

- 11 6. Jon Lash
12 c/o McDonald Carano Wilson LLP
13 100 West Liberty Street, 10th Floor
14 Reno, Nevada 89501
15 (775) 788-2000

16 Mr. Lash is an employee of PARDEE HOMES OF NEVADA and is expected to testify
17 regarding the facts and background of this case.

- 18 7. Clifford Anderson
19 c/o McDonald Carano Wilson LLP
20 100 West Liberty Street, 10th Floor
21 Reno, Nevada 89501
22 (775) 788-2000

23 Mr. Anderson is an employee of PARDEE HOMES OF NEVADA and is expected to
24 testify regarding the facts and background of this case.

- 25 8. Harvey Whitemore
26 c/o Coyote Springs
27 Address Unknown

28 Mr. Whitemore is the owner of the property involved in this lawsuit and is expected to
testify regarding the facts and background of this case.

9. Chicago Title Company
Las Vegas, Nevada
Custodian of Records

The Custodian of Records is expected to testify regarding the facts and background of
this case.

10. Chicago Title Company
Las Vegas, Nevada
Person Most Knowledgeable

1 The Person Most Knowledgeable is expected to testify regarding the facts and
2 background of this case.

3 11. Peter J. Dingerson
4 D&W Real Estate
5 5455 S. Durango Dr., Ste 160
6 Las Vegas, NV 89113

7 Mr. Dingerson is the owner of D&W Real Estate and is expected to testify regarding the
8 facts and background of this case.

9 12. Jay Dana
10 General Realty Group
11 6330 S. Eastern Ave Ste 2
12 Las Vegas, NV 89119

13 Mr. Dana is the owner of General Realty Group Inc. and is expected to testify regarding
14 the facts and background of this case.

15 13. Jerry Masini
16 Award Realty Corp.
17 3015 S. Jones Blvd.
18 Las Vegas, NV 89146

19 Mr. Masini is the owner of Award Realty and is expected to testify regarding the
20 facts and background of this case.

21 14. Mark Carmen
22 Exit Realty Number One
23 6600 W. Charleston, Suite #119
24 Las Vegas, Nevada 89146

25 Mr. Carmen is the owner of Las Vegas Realty Center and is expected to testify
26 regarding the facts and background of this case.

27 15. James J. Jimmerson, Esq.
28 C/O JIMMERSON HANSEN, PC
415 South Sixth Street #100
Las Vegas, Nevada 89101

Mr. Jimmerson is a principal of Jimmerson Hansen, P.C and is expected to
testify regarding Plaintiffs' attorney's fees and costs.

Plaintiffs reserve the right to call any and all witnesses who may be disclosed or
deposed throughout the course of discovery.

1 Plaintiffs reserve the right to call any and all of Defendant's witnesses; and
2 Plaintiffs reserve the right to call any and all rebuttal witnesses.
3 Plaintiffs' experts, if any, as yet unidentified.
4 Plaintiffs reserve the right to supplement this list of witnesses as discovery
5 progresses and until the time of trial in this case.

6 **II.**

7 **DOCUMENTS**

8 Pursuant to NRCP 16.1(a)(1)(B), Plaintiffs provide the following documents relating to
9 Plaintiffs and Defendants:

- 10 1. Any and all written agreements between the Parties;
- 11 2. Any and all documents evidencing damages to the Plaintiffs;
- 12 3. Any and all correspondence between the Parties;
- 13 4. Any and all appropriate Custodian of Record documents;
- 14 5. Any and all pleadings in this matter;

15 These documents are being reproduced as Plaintiffs' Initial NRCP 16.1 Disclosures of
16 Witnesses and Documents had duplicate documents. The duplicate copies have been
removed and the documents are listed as follows:

- 17 1. Option Agreement for the Purpose of Real Property and Joint Escrow
18 Instructions dated May 2004 (Bates No. PLTF0001-0030);
- 19 2. Amended and Restated Option Agreement for the Purchase of Real Property
20 and Joint Escrow Instructions dated March 28, 2005, (Bates No. PLTF0081-
21 0152);
- 22 3. Two Assignments of Real Estate Commission and Personal Certification
23 Agreement (Bates No. PLTF0153-0157A)
- 24 4. Letter dated September 2, 2004 from Pardee Homes to Mr. Walt Walkes
25 regarding the attached Commission letter dated September 1, 2004, (Bates No.
26 PLTF0158-0162);
- 27 5. Amendment No. 2 to Option Agreement for the Purchase of Real Property and
28 Joint Escrow Instructions, (Bates No. PLTF0163-0174);
6. Letter dated April 6, 2009 from Pardee Homes to Mr. Jim Wolfram, (Bates No.
PLTF0175-0179);
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Esq., (Bates No. PLTF0180-0187);
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21 fees and costs." Plaintiffs in bringing this suit expect to be the prevailing party and, as such,
22 are entitled to their reasonable attorney's fees as damages for Defendant's breach of contract,
23 breach of the covenant of good faith and fair dealing, and for compelling the accounting due
24 to Plaintiffs.

25 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
26 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
27 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
28 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for
accounting, and seeking documents owed to Plaintiffs under the September 1, 2004

1 Commission Letter Agreement (for the breach of contract and breach of the covenant of good
2 faith and fair dealing claims) plus one-third of the fees and costs incurred for the prosecution
3 of all of the claims (as one of the three claims is for an accounting for which all of Plaintiffs'
4 fees are damages). Exempt from the damages are fees in connection with the prosecution
5 of the breach of contract and breach of the implied covenant of good faith and fair dealing
6 claims, specifically not in furtherance of the recovery of documents. To date, Plaintiffs'
7 attorney fee damages are greater than or equal to: **\$135,486.87**. Specifically, Plaintiffs'
8 attorney fee damages for the accounting claim equal or exceed **\$135,486.87**; for the claim for
9 the breach of contract equal or exceed \$7,602.50; and for the claim for the breach of the
10 implied covenant of good faith and fair dealing claims equal or exceed \$7,602.50.

11 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
12 discover from public records what information was owed to them under the Commission Letter
13 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
14 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
15 \$6,400.00 for their time.

16 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
17 supplement this response as the investigation and discovery in this case proceeds.

18 Dated this 19TH day of July, 2013.

19 JIMMERSON HANSEN, P.C.

20
21 
22 JAMES M. JIMMERSON, ESQ.

Nevada Bar No. 000264

LYNN M. HANSEN, ESQ.

Nevada Bar No. 0244

JAMES M. JIMMERSON, ESQ.

Nevada Bar No. 12599

415 So. Sixth St., Ste. 100

Las Vegas, NV 89101

Attorney for Plaintiffs

James Wolfram and Walt Wilkes

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 • Facsimile (702) 387-1167

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of PLAINTIFFS' TWELFTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS was made on the 19th day of July, 2013, as indicated below:

☒ By first class mail, postage prepaid from Las Vegas, Nevada pursuant to N.R.C.P. 5(b) addressed as follows below

☐ By electronic service through the E-filing system

☐ By facsimile, pursuant to EDCR 7.26

☐ By receipt of copy as indicated below

PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
McDONALD CARANO WILSON, LLP
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada


An Employee of JIMMERSON HANSEN, P.C.

REDACTED

REDACTED

Bench Trial
3 day trial

Kerry Earley as Judge
at 10 AM
May 13 to 17th

REDACTED

REDACTED

PLTF10531

JA008902

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stnt Date	H	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	04/22/2013	05/21/2013	A	300.00	6.00	1,800.00	ARCH
4886.01	04/22/2013	05/21/2013	A	450.00	0.50	225.00	ARCH
						Review Opposition, prepare Reply in Support.	
						Conference with James M. Jimmerson, Esq. regarding	ARCH
4886.01	04/23/2013	05/21/2013	A	300.00	10.50	3,150.00	ARCH
						Finalized Reply in Support of Motion for Leave to File Second Amended Complaint, e-filed, courtesy copy to chambers, faxed, emailed and mailed to opposing counsel.	
4886.01	04/23/2013	05/21/2013	A	450.00	0.75	337.50	ARCH
						Review and revise Reply to Opposition to Motion to File Amended Complaint.	
4886.01	04/25/2013	05/21/2013	A	300.00	2.00	600.00	ARCH
4886.01	04/26/2013	05/21/2013	A	300.00	0.50	150.00	ARCH
4886.01	04/26/2013	05/21/2013	A	300.00	2.00	600.00	ARCH
						Prepare for hearing on Motion to Leave to Amend Complaint. Prepare for Court Hearing.	
4886.01	04/26/2013	05/21/2013	A	300.00	0.20	60.00	ARCH
4886.01	04/26/2013	05/21/2013	A	300.00	0.50	150.00	ARCH
4886.01	04/26/2013	05/21/2013	A	300.00	0.40	120.00	ARCH
						Court hearing regarding Motion for Leave to File Second Amended Complaint. Legal research on	
4886.01	04/29/2013	05/21/2013	A	300.00	4.80	1,440.00	ARCH
						Legal research on	
4886.01	04/29/2013	05/21/2013	A	300.00	0.20	60.00	ARCH
4886.01	04/30/2013	05/21/2013	A	450.00	0.30	135.00	ARCH
4886.01	04/30/2013	05/21/2013	A	300.00	3.20	960.00	ARCH
4886.01	05/01/2013	05/21/2013	A	300.00	0.50	150.00	ARCH
4886.01	05/09/2013	05/21/2013	A	350.00	6.00	2,100.00	ARCH
						Prepare Order on hearing. Prepare and draft supplement to Motion for Leave to file Second Amended Complaint.	
4886.01	05/09/2013	05/21/2013	A	350.00	0.50	175.00	ARCH
4886.01	05/10/2013	05/21/2013	A	300.00	1.50	450.00	ARCH
						Legal research on	
4886.01	05/10/2013	05/21/2013	A	350.00	14.20	4,970.00	ARCH
						Review Supplement to Motion to File Second Amended Complaint for James M. Jimmerson, Esq.; Meeting with James M. Jimmerson, Esq. regarding	
						Drafting supplement to Motion for Leave to File Second Amended Complaint, call and emails to opposing counsel regarding; Order on 4/26/13 and review of opposing counsel's supplement.	
4886.01	05/11/2013	05/21/2013	A	550.00	0.60	330.00	ARCH
						Review Supplemental points and authorities regarding	
4886.01	05/13/2013	05/21/2013	A	350.00	0.20	70.00	ARCH
4886.01	05/13/2013	05/21/2013	A	450.00	0.75	337.50	ARCH
4886.01	05/14/2013	05/21/2013	A	350.00	0.10	35.00	ARCH
						Prepare emails to opposing counsel regarding	
						Review Plaintiff's Supplement to Motion to Amend	
						Telephone conference with opposing counsel regarding: discovery.	
4886.01	05/15/2013	05/21/2013	A	350.00	0.10	35.00	ARCH
4886.01	05/15/2013	05/21/2013	A	350.00	0.50	175.00	ARCH
						Telephone call to opposing counsel regarding: discovery. Telephone call to opposing counsel regarding: trial date.	

Date: 07/19/2013

Page: 2

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmt Date	H P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	05/16/2013	05/21/2013	A	350.00	0.30	105.00 Prepare email to opposing counsel regarding: deposition dates.	ARCH
4886.01	05/16/2013	05/21/2013	A	350.00	0.30	105.00 Telephone conference with client regarding: deposition date.	ARCH
4886.01	05/16/2013	05/21/2013	A	350.00	0.50	175.00 Prepare and draft Order.	ARCH
4886.01	05/16/2013	05/21/2013	A	350.00	0.50	175.00 Prepare 9th Supplemental Disclosures.	ARCH
4886.01	05/20/2013	05/21/2013	A	450.00	1.75	787.50 Meeting with Jim Wolfram	ARCH
4886.01	05/20/2013	05/21/2013	A	350.00	1.00	350.00 Conference with client regarding: depo prep.	ARCH
4886.01	05/20/2013	05/21/2013	A	350.00	0.50	175.00 Prepare for meeting.	ARCH
4886.01	05/20/2013	05/21/2013	A	350.00	0.50	175.00 Draft of 9th Supplement, redacted billing.	ARCH
Total for Client ID 4886.01				Billable	63.15	20,982.50 WILKES/ WOLFRAM VS. PARDEE HOMES OF NEVADA	

GRAND TOTALS

Billable	63.15	20,982.50
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JA008904

PLTF10529

Friday 07/19/2013 1:59 pm

Detail Cost Transaction File List JIMMERSON HANSEN, P.C.

Date: 07/19/2013

Client	Trans Date	Stmt H Date	Rate	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM					
4886.01	04/23/2013	05/21/2013 A	0.200	4.80 COPIES OF REPLY, 24 PP @ \$0.20 PER PAGE.	ARCH
4886.01	04/29/2013	05/21/2013 A	5.000	Hand Delivery	ARCH
4886.01	04/29/2013	05/21/2013 A	0.200	Item: Offer of Judgment Hand Delivered to McDonald Carano Wilson, LLP	ARCH
4886.01	05/03/2013	05/21/2013 A	0.200	COPIES OF OFFER OF JUDGMENT, 6 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/06/2013	05/21/2013 A	0.200	Copy of Transcript of Proceedings 4/26: 13 - Jennifer Church, Court Reporter	ARCH
4886.01	05/10/2013	05/21/2013 A	0.200	COPIES OF TRANSCRIPT REQ, 1 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/10/2013	05/21/2013 A	0.200	Electronic Filing - Plaintiff's Supplement to Motion for Leave to File a Second Amended complaint Pursuant to the Courts Order on Hearing on April 26, 2013	ARCH
4886.01	05/10/2013	05/21/2013 A	0.200	Electronic Filing - Plaintiff's Supplement to Motion for Leave to File a Second Amended Complaint Pursuant to the Courts Order on Hearing on April 26, 2013	ARCH
4886.01	05/10/2013	05/21/2013 A	0.200	COPIES OF ORDER, 12 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/13/2013	05/21/2013 A	0.200	COPIES OF SUPP BR, 69 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF COPY, 2 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	753.07 Westlaw legal research charges, Usage Period: May 21, 2013	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF COPY 3, 198 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF ORDER, 9 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF COPY 3, 1 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF COPY 3, 36 PP @ \$0.20 PER PAGE.	ARCH
4886.01	05/20/2013	05/21/2013 A	0.200	COPIES OF COPY 3, 3 PP @ \$0.20 PER PAGE.	ARCH
Total for Client ID 4886.01			Billable	1,044.77 WILKES/ WOLFRAM	
				VS. PARDEE HOMES OF NEVADA	

GRAND TOTALS

Billable 1,044.77

PLTF10530

JA008905

Friday 07/19/2013 2:00 pm

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Date: 17/19/2013

Client	Trans Date	Stmnt Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	05/20/2013	05/21/2013	450.00	1.75	787.50 Meeting with Jim Wolfram	ARCH
4886.01	05/20/2013	05/21/2013	350.00	1.00	350.00 Conference with client regarding:	ARCH
4886.01	05/20/2013	05/21/2013	350.00	0.50	175.00 Prepare for meeting.	ARCH
4886.01	05/20/2013	05/21/2013	350.00	0.50	175.00 Draft of 9th Supplement, redacted billing.	ARCH
4886.01	05/20/2013	05/21/2013	300.00	0.50	150.00 Discussion with James M. Jimmerson, Esq. for the purposes of Supplement regarding.	ARCH
4886.01	05/22/2013	06/21/2013	350.00	1.00	350.00 Prepare 9th Supplement.	ARCH
4886.01	05/22/2013	06/21/2013	350.00	0.50	175.00 Prepare redacting bills.	ARCH
4886.01	05/22/2013	06/21/2013	350.00	1.00	350.00 Prepare calculating dates.	ARCH
4886.01	05/22/2013	06/21/2013	450.00	0.40	180.00 Review 9th supplement	ARCH
4886.01	05/24/2013	06/21/2013	450.00	2.00	900.00 Deposition preparation with Jim Wolfram	ARCH
4886.01	05/24/2013	06/21/2013	350.00	1.50	525.00 Attend depo prep with client.	ARCH
4886.01	05/24/2013	06/21/2013	350.00	0.50	175.00 Conference with Lynn M. Hansen, Esq. regarding:	ARCH
4886.01	05/24/2013	06/21/2013	450.00	0.50	225.00 Meet with James M. Jimmerson, Esq. regarding.	ARCH
4886.01	05/28/2013	06/21/2013	350.00	1.20	420.00 Prepare Order, emailed opposing counsel for review and signature.	ARCH
4886.01	05/29/2013	06/21/2013	450.00	2.00	900.00 Meet with Jim Wolfram regarding	ARCH
4886.01	05/29/2013	06/21/2013	450.00	0.25	112.50 Review proposed Order	ARCH
4886.01	05/29/2013	06/21/2013	350.00	0.20	70.00 Prepare email to opposing counsel with scans of map.	ARCH
4886.01	05/29/2013	06/21/2013	350.00	0.50	175.00 Telephone call to opposing counsel regarding: depo and order.	ARCH
4886.01	05/29/2013	06/21/2013	350.00	0.30	105.00 Telephone conference with client.	ARCH
4886.01	05/29/2013	06/21/2013	350.00	1.50	525.00 Attend depo prep with client.	ARCH
4886.01	05/29/2013	06/21/2013	450.00	1.50	675.00 Attend depo prep w/client	ARCH
4886.01	05/30/2013	06/21/2013	350.00	0.50	175.00 Prepare redacted billing statements.	ARCH
4886.01	05/31/2013	06/21/2013	450.00	1.50	675.00 Attend deposition of Jim Wolfram	ARCH
4886.01	05/31/2013	06/21/2013	350.00	1.40	490.00 Deposition of client.	ARCH
4886.01	05/31/2013	06/21/2013	350.00	0.10	35.00 Email to opposing counsel regarding Eleventh Supplement.	ARCH
4886.01	05/31/2013	06/21/2013	350.00	1.50	525.00 Drafting Eleventh Supplement / identification of damages.	ARCH
4886.01	05/31/2013	06/21/2013	450.00	1.40	630.00 Attend depo of client	ARCH
4886.01	06/03/2013	06/21/2013	450.00	0.25	112.50 Review email to Opposing Counsel	ARCH
4886.01	06/06/2013	06/21/2013	350.00	0.20	70.00 Prepare and filed Notice of Entry of Order.	ARCH
4886.01	06/06/2013	06/21/2013	350.00	0.10	35.00 Filed Second Amended Complaint.	ARCH
4886.01	06/06/2013	06/21/2013	350.00	0.50	175.00 Prepare emails to opposing counsel regarding: supplements.	ARCH
4886.01	06/11/2013	06/21/2013	350.00	1.00	350.00 Prepare emails to opposing counsel regarding: extension of time to respond.	ARCH
4886.01	06/12/2013	06/21/2013	450.00	0.30	135.00 Conference with James M. Jimmerson, Esq. regarding	ARCH

PLTF10531

JA008906

Friday 07/19/2013 11:01 am

Date: 07/19/2013

Page: 2

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmnt Date	H P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	06/13/2013	06/21/2013	A	350.00	0.50	175.00	ARCH
4886.01	06/19/2013	06/21/2013	A	350.00	0.30	105.00	ARCH
4886.01	06/20/2013	06/21/2013	A	350.00	0.10	35.00	ARCH

175.00 Prepare 9th Supplement.
105.00 Prepare email to opposing counsel regarding: EDCR 2.67.
35.00 Telephone call to A. Shipley, left message.

Total for Client ID 4886.01

28.75 11,222.50 WILKES/ WOLFRAM
VS. PARDEE HOMES OF NEVADA

GRAND TOTALS

Billable 28.75 11,222.50

JA008907 PLTF10532

Friday 07/19/2013 11:01 am

Detail Cost Transaction File List
JIMMERSON HANSEN, P.C

Client	Trans Date	Stmnt Date	H P	Rate	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	06/04/2013	06/21/2013	A		578.10	ARCH
4886.01	06/05/2013	06/21/2013	A		3.50	ARCH
						Deposition transcript of Video Depo Prep of Wolfram - Litigation Services
						Electronic Filing - Order Granting Plaintiff's Motion for Leave to File a
						Second Amended Complaint
4886.01	06/05/2013	06/21/2013	A		3.50	ARCH
4886.01	06/06/2013	06/21/2013	A		3.50	ARCH
4886.01	06/06/2013	06/21/2013	A		3.50	ARCH
						Electronic Filing - Notice of Entry of Order
						Electronic Filing - Notice of Entry of Order on Hearing of Hearing 4-26-13
						Electronic Filing - Second Amended Complaint
Total for Client ID 4886.01				Billable	592.10	
						WILKES/ WOLFRAM
						VS. PARDEE HOMES OF NEVADA
						GRAND TOTALS

EXHIBIT 16

EXHIBIT 16

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 Facsimile (702) 387-1167

1 **SUPP**
2 JAMES J. JIMMERSON, ESQ.
3 Nevada Bar No. 000264
4 LYNN M. HANSEN, ESQ.
5 Nevada Bar No. 0244
6 JAMES M. JIMMERSON, ESQ.
7 Nevada Bar No. 12599
8 JIMMERSON HANSEN, P.C.
9 415 So. Sixth St., Ste. 100
10 Las Vegas, NV 89101
11 Tel No.: (702) 388-7171; Fax No.: (702) 380-6406
12 jjj@jimmersonhansen.com
13 lmh@jimmersonhansen.com
14 jmj@jimmersonhansen.com
15 Attorney for Plaintiffs
16 *James Wolfram and Walt Wilkes*

DISTRICT COURT
CLARK COUNTY, NEVADA

12 JAMES WOLFRAM AND WALT WILKES
13 Plaintiffs,
14 vs.
15 PARDEE HOMES OF NEVADA,
16 Defendant.

CASE NO.: A-10-632338-C
DEPT NO.: IV

PLAINTIFFS' THIRTEENTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF
WITNESSES AND DOCUMENTS

19 COME NOW Plaintiffs, JAMES WOLFRAM and WALT WILKES, by and through their
20 attorneys, Lynn M. Hansen, Esq., and James M. Jimmerson, Esq., of the law firm of
21 Jimmerson Hansen, P.C., and hereby submit the following Thirteenth Supplement to their list
22 of witnesses and production of documents, as follows (*new items in bold*):

23 ///

24 ///

25 ///

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1167

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I.
WITNESSES

Plaintiffs provide the following witnesses' identities, last known address and telephone numbers:

1. James Wolfram
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

2. Walt Wilkes
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

3. Frances Butler Dunlap
Chicago Title Company
Las Vegas, Nevada

This person was the head of the Real Estate Commercial Department of Chicago Title Company, is most knowledgeable, and is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

4. PARDEE HOMES OF NEVADA
Custodian of Records
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89501
(775) 788-2000

Pardee Homes of Nevada is a named Defendant in this matter. Its present or former employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6) and/or custodians of records are expected to testify regarding the facts and background of this case.

- 1 5. PARDEE HOMES OF NEVADA
2 Person Most Knowledgeable
3 McDonald Carano Wilson LLP
4 100 West Liberty Street, 10th Floor
5 Reno, Nevada 89501
6 (775) 788-2000

7 Pardee Homes of Nevada is a named Defendant in this matter. Its present or former
8 employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6)
9 and/or Person Most Knowledgeable are expected to testify regarding the facts and background
10 of this case.

- 11 6. Jon Lash
12 c/o McDonald Carano Wilson LLP
13 100 West Liberty Street, 10th Floor
14 Reno, Nevada 89501
15 (775) 788-2000

16 Mr. Lash is an employee of PARDEE HOMES OF NEVADA and is expected to testify
17 regarding the facts and background of this case.

- 18 7. Clifford Anderson
19 c/o McDonald Carano Wilson LLP
20 100 West Liberty Street, 10th Floor
21 Reno, Nevada 89501
22 (775) 788-2000

23 Mr. Anderson is an employee of PARDEE HOMES OF NEVADA and is expected to
24 testify regarding the facts and background of this case.

- 25 8. Harvey Whitmore
26 c/o Coyote Springs
27 Address Unknown

28 Mr. Whitmore is the owner of the property involved in this lawsuit and is expected to
testify regarding the facts and background of this case.

9. Chicago Title Company
 Las Vegas, Nevada
 Custodian of Records

 The Custodian of Records is expected to testify regarding the facts and background of
this case.

10. Chicago Title Company
 Las Vegas, Nevada
 Person Most Knowledgeable

1 The Person Most Knowledgeable is expected to testify regarding the facts and
2 background of this case.

3 11. Peter J. Dingerson
4 D&W Real Estate
5 5455 S. Durango Dr., Ste 160
6 Las Vegas, NV 89113

7 Mr. Dingerson is the owner of D&W Real Estate and is expected to testify regarding the
8 facts and background of this case.

9 12. Jay Dana
10 General Realty Group
11 6330 S. Eastern Ave Ste 2
12 Las Vegas, NV 89119

13 Mr. Dana is the owner of General Realty Group Inc. and is expected to testify regarding
14 the facts and background of this case.

15 13. Jerry Masini
16 Award Realty Corp.
17 3015 S. Jones Blvd.
18 Las Vegas, NV 89146

19 Mr. Masini is the owner of Award Realty and is expected to testify regarding the
20 facts and background of this case.

21 14. Mark Carmen
22 Exit Realty Number One
23 6600 W. Charleston, Suite #119
24 Las Vegas, Nevada 89146

25 Mr. Carmen is the owner of Las Vegas Realty Center and is expected to testify
26 regarding the facts and background of this case.

27 15. James J. Jimmerson, Esq.
28 C/O JIMMERSON HANSEN, PC
415 South Sixth Street #100
Las Vegas, Nevada 89101

Mr. Jimmerson is a principal of Jimmerson Hansen, P.C and is expected to testify
regarding Plaintiffs' attorney's fees and costs.

16. Klif Andrews
Pardee Homes of Nevada
650 White Drive, Suite 100
Las Vegas, Nevada 89119

1 Mr. Andrews is the President of Pardee Homes of Nevada and is expected to
2 testify about facts and circumstances about the case. Specifically he is expected to
3 testify concerning all production of residential property at Coyote Springs.

4
5 17. Chelsea Peltier
Slater Hanifan Group
6 5740 S. Arville, Suite #216
Las Vegas, Nevada 89118
7

8 Ms. Peltier is an employee of Slater Hanifan Group and is expected to testify
9 and is expected to testify about facts and circumstances about the case. Specifically
10 she is expected to testify concerning all production of residential property at Coyote
11 Springs.

12 18. Jerry Slater
Slater Hanifan Group
13 5740 S. Arville, Suite #216
Las Vegas, Nevada 89118
14

15 Mr. Slater is a principal of Slater Hanifan Group and is expected to testify and
16 is expected to testify about facts and circumstances about the case. Specifically he is
17 expected to testify concerning all production of residential property at Coyote
18 Springs.

19
20 19. Kenneth Hanifan
Slater Hanifan Group
21 5740 S. Arville, Suite #216
Las Vegas, Nevada 89118
22

23 Mr. Hanifan is a principal of Slater Hanifan Group and is expected to testify
24 and is expected to testify about facts and circumstances about the case. Specifically
25 he is expected to testify concerning all production of residential property at Coyote
26 Springs.

27
28 20. Jim Rizzi
Pardee Homes of Nevada
650 White Drive, Suite 100
Las Vegas, Nevada 89119

1
2 Mr. Rizzi is an employee of Pardee Homes and is expected to testify and is
3 expected to testify about facts and circumstances about the case. Specifically he is
4 expected to testify concerning all production of residential property at Coyote
5 Springs.

6
7 Plaintiffs reserve the right to call any and all witnesses who may be disclosed or
8 deposited throughout the course of discovery.

9 Plaintiffs reserve the right to call any and all of Defendant's witnesses; and

10 Plaintiffs reserve the right to call any and all rebuttal witnesses.

11 Plaintiffs' experts, if any, as yet unidentified.

12 Plaintiffs reserve the right to supplement this list of witnesses as discovery
13 progresses and until the time of trial in this case.

14 II.

15 DOCUMENTS

16 Pursuant to NRCP 16.1(a)(1)(B), Plaintiffs provide the following documents relating to
17 Plaintiffs and Defendants:

- 18 1. Any and all written agreements between the Parties;
- 19 2. Any and all documents evidencing damages to the Plaintiffs;
- 20 3. Any and all correspondence between the Parties;
- 21 4. Any and all appropriate Custodian of Record documents;
- 22 5. Any and all pleadings in this matter;

23 These documents are being reproduced as Plaintiffs' Initial NRCP 16.1 Disclosures of
24 Witnesses and Documents had duplicate documents. The duplicate copies have been
25 removed and the documents are listed as follows:

- 26 1. Option Agreement for the Purpose of Real Property and Joint Escrow Instructions
27 dated May 2004 (Bates No. PLTF0001-0080);
- 28 2. Amended and Restated Option Agreement for the Purchase of Real Property and
Joint Escrow Instructions dated March 28, 2005, (Bates No. PLTF0081-0152);
3. Two Assignments of Real Estate Commission and Personal Certification
Agreement (Bates No. PLTF0153-0157A)
4. Letter dated September 2, 2004 from Pardee Homes to Mr. Walt Walkes

- 1 regarding the attached Commission letter dated September 1, 2004, (Bates No. PLTF0158-0162);
- 2
- 3 5. Amendment No. 2 to Option Agreement for the Purchase of Real Property and Joint Escrow Instructions, (Bates No. PLTF0163-0174);
- 4 6. Letter dated April 6, 2009 from Pardee Homes to Mr. Jim Wolfram, (Bates No. PLTF0175-0179);
- 5
- 6 7. Letter dated April 23, 2009 from James J. Jimmerson, Esq., to Jim Stringer, Esq., (Bates No. PLTF0180-0187);
- 7 8. Letter dated May 19, 2011 from James J. Jimmerson, Esq., to Jim Stringer, Esq., (Bates No. PLTF0188-0191);
- 8
- 9 9. Letter dated July 10, 2009 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0192-0193);
- 10 10. Letter dated August 26, 2009 from James J. Jimmerson, Esq., to Charles E. Curtis, (Bates No. PLTF0194-0196);
- 11 11. Letter dated November 24, 2009 from Jon E. Lash to Mr. Jim Wolfram, (Bates No. PLTF0197-0202);
- 12 12. Letter dated April 21, 2010 from Jim Wolfram to Mr. Jon Lash, (Bates No. PLTF0203-0205);
- 13 13. Letter dated May 17, 2010 from James J. Jimmerson, Esq., to Mr. John E. Lash, (Bates No. PLTF0206-0209);
- 14 14. Letter dated June 14, 2010 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0210-0211);
- 15 15. Bates Nos. PLTF0212-0244 are the duplicative documents produced in Plaintiffs' Initial 16.1 Disclosure of Documents and Witnesses.
- 16 16. Documents produced by Stewart Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF0245-PLTF1423);
- 17 17. Documents produced by Chicago Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF1424-PLTF10414);
- 18 18. Documents produced by Coyote Springs Investments in response to Plaintiff's Duces Tecum on CD, (Bates No. CSI_Wolfram 000014 - CSI_Wolfram0003004), attached hereto;
- 19 19. Coyote Springs Investment, LLC's Privilege Log, (Bates No. PLTF10415 - PLTF10417), attached hereto;
- 20 20. Affidavit of Custodian of Records, (Bates No. PLTF10418-PLTF10419); attached hereto;
- 21 21. Non-Party Coyote Springs Investments, LLC's Supplement and Amended Objection and Response to Plaintiff's Subpoena Duces Tecum, (Bates PLTF10420-PLTF10424, attached hereto.
- 22 22. Chicago Title Company's previously bates stamped documents no. PLTF 1424

through PLTF 10414 (on bottom right of documents bates stamped) and rebated as bates nos: Cht 00001 through Cht 08998 (on bottom left of documents bates stamped), including the Custodian of Records Subpoena to Chicago Title Company including the executed Certificate of Custodian of Records bates stamped as Cht 08997.

23. Stewart Title Company's previously bates stamped documents no. PLTF 0245 through PLTF 1423 and rebated as bates nos: Stwt 0001 through 1202. Documents Stwt 0699 and Stwt 0731 are copy coversheets and were inadvertently bates stamped.
24. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 138, page 51, bates PLTF 10427 through PLTF 10438.
25. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 116, page 35, bates PLTF 10439 through PLTF 10440.
26. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 117, page 18, bates PLTF 10441 through PLTF 10443.
27. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 140, page 57, bates PLTF 10444 through PLTF 10456.
28. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 113, page 55, bates PLTF 10457 through PLTF 10462.
29. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 98, page 57, bates PLTF 10463 through PLTF 10468.
30. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from November 3, 2010 through October 19, 2012, bates PLTF 10469 through PLTF 10481.
31. Affidavit of Peter J. Dingerson, bates PLTF 10482 through PLTF 10484.
32. Assignment of Rights, Title and Interest from Jay Dana on behalf of General Realty Group Inc. to Walt Wilkes, dated January 11, 2011, bates PLTF 10485.
33. Assignment of Rights, Title and Interest from Jerry Masini on behalf of Award Realty to James Wolfram, dated December 20, 2010, bates PLTF 10486.
34. Letter from Jeffrey King, M.D. dated November 1, 2011 regarding the health of Walt Wilkes, bates PLTF 10487.
35. Affidavit of Jerry Masini, bates PLTF 10488 through PLTF 10490.
36. Assignment signed by Mark Carmen dated December 3, 2012 along with Exhibit A signed by Jay Dana dated January 11, 2011, attached hereto as bates PLTF 10491 through PLTF 10493; and
37. Assignment signed by Peter J. Dingerson dated December 20, 2012 along with Exhibit A signed by Jerry Masini dated December 20, 2010, attached hereto as bates PLTF 10494 through PLTF 10496.
38. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from October 24, 2012 through February 21, 2013, bates PLTF 10497 through PLTF 10499.

- 1 39. Copy of redacted costs representing costs expended by Jimmerson Hansen, P.C.
2 from December 29, 2010 through February 4, 2013 bates PLTF 10500 through
3 PLTF 10505.
- 4 40. Copy of redacted billing sheets representing attorney's fees charged by
5 Jimmerson Hansen, P.C. from February 21, 2013 through March 29, 2013, bates
6 PLTF 10506 through PLTF 10508.
- 7 41. Copy of redacted costs representing costs expended by Jimmerson Hansen, P.C.
8 from February 27, 2013 through March 13, 2013 bates PLTF 10509 through
9 10510.
- 10 42. Copy of redacted billing sheets representing attorney's fees charged by
11 Jimmerson Hansen, P.C. from April 1, 2013 through April 18, 2013, bates PLTF
12 10511 through PLTF 10512.
- 13 43. Color copy of the map as edited by James Wolfram, attached hereto as bates
14 PLTF 10513.
- 15 44. Color copy the original map from Jon Lash to James Wolfram of the entire site,
16 attached hereto as bates PLTF 10514.
- 17 45. Three (3) color copies of maps from James Wolfram to Jon Lash, originally
18 produced by your office on April 21, 2010, attached hereto as bates PLTF 10515-
19 10517; and
- 20 46. A further detailed computation of the attorney fee damages is found at Exhibit "1"
21 attached hereto. Exhibit "1" is a collection of the previously produced attorney's
22 fees with the highlighted sections representing the line items which were
23 aggregated at 100% plus the non-highlighted line items which were aggregated
24 at 33.3% to equal \$102,160.00. The pink highlighted line items represent those
25 damages for a breach of contract and breach of the implied covenant of good
26 faith and fair dealing claims, which total \$7,602.50.
- 27 47. Emails dated from September 2008 between Nevada Title and Plaintiffs with their
28 attachments (commercial sales and parcels designated for the upcoming BLM
land action from Nevada Tile), attached hereto as bates PLTF 10518-10527.
48. Computation of attorneys fees and billing from April 22, 2013 through May 21,
2013, attached hereto as bates PLTF 10528 through 10530.
49. Computation of attorneys fees and billing from May 20, 2013 through June 20,
2013, attached hereto as bates PLTF 10531 through 10533.
50. Documents regarding Coyote Springs Major Plan dated 8/4/2008, previously
produced as Bates Nos. CNTY00001-CNTY00543.
51. Documents regarding Coyote Springs Major Plan dated May 5, 2006,
previously produced as Bates Nos. CNTY00542-00898.
52. Documents regarding Coyote Springs Major Plan dated 6/2002, previously
produced as Bates Nos. CNTY00899-CNTY01193.
53. Documents regarding Coyote Springs Development Agreement dated
6/16/2004, previously produced as Bates Nos. CNTY01194-CNTY01262.
54. Documents regarding Coyote Springs Development Agreement dated

12/18/2002, previously produced as Bates Nos. CNTY01263-01334.

55. Notice of Final Action Clark County Zoning Commission dated 2/16/2011, previously produced as Bates Nos. CNTY01335-01347.
56. Tentative Map Application filed 12/29/2010, previously attached as Bates Nos. CNTY01348-01349.
57. Tentative Map Application 0094-10 Coyote Springs Village #4 approval 2/15/2011, previously produced as Bates Nos. CNTY01350-01351.
58. Map of Coyote Springs dated 5/23/2008, previously produced as Bates Nos. CNTY01352.
59. Coyote Springs Village #4 tentative map dated 12/28/2010, previously produced as Bates Nos. CNTY01353-01358.

Plaintiffs reserve the right to any and all documents the Defendants disclosed by any parties or used at any depositions.

Plaintiffs reserve the right to any and all other relevant documents to this matter.

Plaintiffs reserve the right to identify and produce different and/or additional documents as the investigation and discovery in this case proceeds.

III.

COMPUTATION OF DAMAGES

Plaintiffs calculate their damages to be in excess of \$1,930,000.00 associated with the Defendant's breach of contract and the Defendant's failure to faithfully meet their obligations to the Plaintiffs.

There are two primary components to this calculation. The first component is the loss of future commissions from future sales or takedowns of property located in Clark County, subject to the September 1, 2004 Commission Letter Agreement. There appears to be at least 3,000 acres of property, defined as Option Property under the Option Agreement effective June 1, 2004, currently owned by Coyote Springs Investment, LLC in Township 13 South, Range 63 East M.D.M., Clark County, Nevada. Under the Option Agreement effective June 1, 2004, these 3,000 acres can be purchased by Pardee and designated as Production Residential Property—a purchase and designation that would entitle Plaintiffs to a 1.5% commission on a per-acre price of \$40,000.00. If 3,000 acres were purchased by Pardee under this scenario, Plaintiffs would be entitled to \$1,800,000 in commissions. However, Pardee's course of

1 conduct in failing to appropriately discharge its duties under the Commission Letter Agreement
2 has robbed Plaintiffs of this opportunity to be paid these commissions. Pardee's actions have
3 served to reclassify the land originally labeled

4 1, 2004 Commission Letter Agreement. As stated in the Agreement, "In the event, either party
5 brings an action to enforce its rights under this Agreement, the prevailing party shall be
6 awarded reasonable attorneys' fees and costs." Plaintiffs in bringing this suit expect to be the
7 prevailing party and, as such, are entitled to their reasonable attorney's fees as damages for
8 Defendant's breach of contract, breach of the covenant of good faith and fair dealing, and for
9 compelling the accounting due to Plaintiffs.

10 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
11 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
12 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
13 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for accounting,
14 and seeking documents owed to Plaintiffs under the September 1, 2004 Commission Letter
15 Agreement (for the breach of contract and breach of the covenant of good faith and fair dealing
16 claims) plus one-third of the fees and costs incurred for the prosecution of all of the claims (as
17 one of the three claims is for an accounting for which all of Plaintiffs' fees are damages).
18 Exempt from the damages are fees in connection with the prosecution of the breach of contract
19 and breach of the implied covenant of good faith and fair dealing claims, specifically not in
20 furtherance of the recovery of documents. To date, Plaintiffs' attorney fee damages are greater
21 than or equal to: **\$135,486.87**. Specifically, Plaintiffs' attorney fee damages for the accounting
22 claim equal or exceed **\$135,486.87**; for the claim for the breach of contract equal or exceed
23 \$7,602.50; and for the claim for the breach of the implied covenant of good faith and fair
24 dealing claims equal or exceed \$7,602.50.

25 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
26 discover from public records what information was owed to them under the Commission Letter
27 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
28 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
\$6,400.00 for their time.

1 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
2 supplement this response as the investigation and discovery in this case proceeds.

3 Dated this 11th day of day of December, 2013.

4 JIMMERSON HANSEN, P.C.

6 /s/ James M. Jimmerson
JAMES J. JIMMERSON, ESQ.
Nevada Bar No. 000264
7 LYNN M. HANSEN, ESQ.
Nevada Bar No. 0244
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9 415 So. Sixth St., Ste. 100
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CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of PLAINTIFFS' THIRTEENTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS was made on the 11th day of December, 2013, as indicated below:

☒ By first class mail, postage prepaid from Las Vegas, Nevada pursuant to N.R.C.P. 5(b) addressed as follows below

By electronic service through the E-filing system

By facsimile, pursuant to EDCR 7.26

By receipt of copy as indicated below

PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
McDONALD CARANO WILSON, LLP
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada

/s/ Stephanie Spilotro
An Employee of JIMMERSON HANSEN, P.C.

IN THE SUPREME COURT OF THE STATE OF NEVADA

Case No.: 72371

Electronically Filed
~~Feb 28 2018~~ 12:49 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

PARDEE HOMES OF NEVADA

Appellant,

v.

JAMES WOLFRAM and WALT WILKES, et al.

Respondents.

Appeal Regarding Judgment and Post-Judgment Orders
Eighth Judicial District Court
District Court Case No.: A-10-632338-C

JOINT APPENDIX – VOLUME 56 OF 88

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10/25/2011	Transcript re Discovery Conference	1	JA000024- JA000027
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11/29/2011	Order Setting Civil Non-Jury Trial	1	JA000031- JA000032
12/15/2011	Stipulated Confidentiality Agreement and Protective Order	1	JA000033- JA000039
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10/24/2012	Appendix of Exhibits in Support of Defendant's Motion for Summary Judgment	1	JA000083- JA000206
10/24/2012	Declaration of Aaron D. Shipley in Support of Defendant's Motion for Summary Judgment	1	JA000207- JA000211
10/25/2012	Appendix of Exhibits in Support of Defendant's Motion for Summary Judgment – filed under seal	2	JA000212- JA000321
11/07/2012	Opposition to Defendant's Motion for Summary Judgment and Plaintiffs' Counter Motion for Partial Summary Judgment	2	JA000322- JA000351
11/09/2012	Appendix of Exhibits to Plaintiffs' Memorandum of Points and Authorities in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiffs' Counter Motion for Summary Judgment – sections filed under seal	3-6	JA000352- JA001332
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09/16/2013	Reply in Support of Defendant's Motion in Limine to Exclude Plaintiffs' Claim For Damages in the Form of Compensation for Time	17	JA002870- JA002874
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07/15/2015	Pardee Homes of Nevada's Consolidated Opposition To: (1) Plaintiff's Motion to Strike Judgment Entered on June 15, 2015 Pursuant to NRCP 52(b) and NRCP 59; and (2) Plaintiffs' Motion Pursuant to NRCP 52(b) and 59 to Amend the Court's Judgment Entered on June 15, 2015	63	JA009919- JA009943
09/12/2015	Pardee Homes of Nevada's Consolidated Reply in Support of (1) Motion to Retax Plaintiffs' Memorandum of Costs Filed June 19, 2015; and (2) Motion for Attorney's Fees and Costs	68	JA010812- JA010865
12/30/2015	Pardee Homes of Nevada's Consolidated Response to: (1) Plaintiffs' Notice of Non-Reply and Non-Opposition to Plaintiffs' Opposition to Pardee's Motion to Amend Judgment and Countermotion for Attorney's Fees; and (2) Plaintiffs' Supplement to Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	69	JA010946- JA010953
06/01/2016	Pardee Homes of Nevada's Motion to Amend Judgment	72	JA011455- JA011589
07/02/2015	Pardee Homes of Nevada's Motion to Amend Judgment	59	JA009207- JA009283
06/27/2016	Pardee Homes of Nevada's Opposition to Plaintiffs' Motion for Attorney's Fees and Costs	82	JA013025- JA013170
07/15/2015	Pardee Homes of Nevada's Opposition to Plaintiff's Motion for Attorney's Fees and Costs	62	JA009759- JA009771

Date	Document Description	Volume	Labeled
08/10/2015	Pardee Homes of Nevada's Opposition to Plaintiffs' Motion for Reconsideration of the Order on Pardee's Emergency Motion to Stay Execution of Judgment	67	JA010582-JA010669
06/30/2016	Pardee Homes of Nevada's Reply in Support of Motion for Attorney's Fees and Costs	82	JA013171-JA013182
06/30/2016	Pardee Homes of Nevada's Reply in Support of Motion to Amend Judgment; and Opposition to Plaintiffs' Countermotion for Attorney's Fees	82	JA013183-JA013196
07/01/2016	Pardee Homes of Nevada's Reply in Support of Motion to Retax Plaintiffs' Memorandum of Costs Filed May 23, 2016	82	JA013197-JA013204
03/23/2016	Pardee Homes of Nevada's Response to Plaintiffs' Motion to Settle Two (2) Sets of Competing Judgments and Orders	71	JA011214-JA011270
08/25/2014	Pardee Homes of Nevada's Supplemental Brief Regarding Future Accounting	49	JA007699-JA007707
02/08/2017	Pardee Notice of Appeal	86	JA013657-JA013659
07/08/2015	Pardee's Emergency Motion to Stay Execution of Judgment: and Ex Parte Order Shortening Time	62	JA009663-JA009710
06/06/2016	Pardee's Motion for Attorney's Fees and Costs	72	JA011590-JA011614
05/28/2015	Pardee's Motion for Attorney's Fees and Costs	49	JA007718-JA007734
06/24/2014	Pardee's Motion to Expunge Lis Pendens – section filed under seal	48	JA007411-JA007456

Date	Document Description	Volume	Labeled
06/24/2015	Pardee's Motion to Retax Plaintiffs' Memorandum of Costs Filed June 19, 2015	52	JA008192- JA008215
05/31/2016	Pardee's Motion to Retax Plaintiffs' Memorandum of Costs Filed May 23, 2016	71	JA011442- JA011454
04/07/2017	Pardee's Motion to Stay Execution of Judgment and Post-Judgment Orders	86	JA013660- JA013668
05/10/2017	Pardee's Reply in Support of Motion to Stay Execution of Judgment and Post-Judgment Orders	88	JA014069- JA014071
10/17/2016	Pardee's Supplemental Brief Regarding Pre- and Post-Judgment Interest Pursuant to the Court's Order	86	JA013591- JA013602
07/08/2015	Pardee's Supplemental Briefing in Support of its Emergency Motion to Stay Execution of Judgment	62	JA009711- JA009733
08/25/2014	Plaintiff's Accounting Brief Pursuant to the court's Order Entered on June 25, 2014	49	JA007647- JA007698
09/12/2016	Plaintiffs' Brief on Interest Pursuant to the Court's Order Entered on August 15, 2016	86	JA013566- JA013590
05/23/2016	Plaintiffs' Memorandum of Costs and Disbursements	71	JA011397- JA011441
06/08/2016	Plaintiffs' Motion for Attorney's Fees and Costs	77	JA012115- JA012182
06/29/2015	Plaintiffs' Motion for Attorney's Fees and Costs	52-53	JA008216- JA008327
07/24/2015	Plaintiffs' Motion for Reconsideration, Ex Parte (With Notice) of Application for Order Shortening Time Regarding Stay of Execution and Order Shortening Time Regarding Stay of Execution	67	JA010482- JA010522

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07/18/2013	Plaintiffs' Motion in Limine To Permit James J. Jimmerson, Esq. To Testify Concerning Plaintiffs' Attorney's Fees and Costs (MIL #25)	17	JA002732- JA002771
06/29/2015	Plaintiffs' Motion Pursuant to NRCp 52(b) and 59 to Amend The Court's Judgment Entered on June 15, 2015, to Amend the Findings of Fact/conclusions of Law and Judgment Contained Therein, Specifically Referred to in the Language Included in the Judgment at Page 2, Lines 8 Through 13 and the Judgment At Page 2, Lines 18 Through 23 to Delete the Same or Amend The Same to Reflect the True Fact That Plaintiff Prevailed On Their Entitlement to the First Claim for Relief For an Accounting, and Damages for Their Second Claim for Relief of Breach of Contract, and Their Third Claim for Relief for Breach of the Implied Covenant for Good Faith and Fair Dealing and That Defendant Never Received a Judgment in its Form and Against Plaintiffs Whatsoever as Mistakenly Stated Within the Court's Latest "Judgment – sections filed under seal	54-56	JA008395- JA008922
03/14/2016	Plaintiffs' Motion to Settle Two (2) Competing Judgments and Orders	70	JA011168- JA011210
06/21/2016	Plaintiffs' Opposition to Defendant, Pardee Homes of Nevada's, Motion to Amend Judgment and Plaintiffs' Countermotion for Attorneys' Fees and Costs Pursuant to NRS 18.010 and EDCR 7.60	81	JA012813- JA013024
08/06/2013	Plaintiffs Opposition to Defendants Motion for Partial Summary Judgment	17	JA002830- JA002857

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03/20/2013	Plaintiffs Opposition to Defendant's Motion in Limine to Exclude Plaintiffs Claim for Attorney's Fees as an Element of Damages MIL 1	15	JA002359- JA002408
03/20/2013	Plaintiffs Opposition to Defendants Motion in Limine to Plaintiffs Claim for Damages in the form of compensation for time MIL 2	15	JA002409- JA002433
07/17/2015	Plaintiffs' Opposition to Pardee Homes of Nevada's Motion to Amend Judgment and Countermotion for Attorney's Fees	65-67	JA010203- JA010481
06/30/2015	Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	57-58	JA008923- JA009109
06/21/2016	Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	80	JA012625- JA012812
05/12/2017	Plaintiffs' Opposition to Pardee's Motion Stay Execution of Judgment and Post-Judgment Orders	88	JA014072- JA014105
07/08/2015	Plaintiffs' Opposition to Pardee's Motion to Retax Costs	60-61	JA009284- JA009644
06/20/2016	Plaintiffs' Opposition to Pardee's Motion to Retax Plaintiffs' Memorandum of Costs Filed May 23, 2016	77-79	JA012183- JA012624
11/04/2016	Plaintiffs' Reply Brief in Support of Brief on Interest Pursuant to the Court's Order Entered on August 15, 2016	86	JA013603- JA013612
04/23/2013	Plaintiffs Reply in Further Support of Motion for Leave to File Second Amended Complaint	16	JA002503- JA002526

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01/17/2013	Plaintiffs' Reply in Further Support of Their Counter Motion for Partial Summary Judgment	13	JA002102- JA002144
08/02/2016	Plaintiffs' Reply in Support of Countermotion for Attorney's Fees and Costs	84-85	JA013358- JA013444
08/02/2016	Plaintiffs' Reply in Support of Motion for Attorney's Fees and Costs	83-84	JA013205- JA013357
01/11/2016	Plaintiffs' Reply to Defendants Consolidated Response to (1) Plaintiffs' Notice of Non-Reply and Non-Opposition to Plaintiff's Opposition to Pardee's Motion to Amend Judgment and Countermotion for Attorney's Fees And (2) Plaintiffs' Supplement to Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	69	JA010954- JA010961
07/15/2013	Plaintiffs Reply to Defendants Counterclaim	17	JA002724- JA002731
09/11/2015	Plaintiffs' Reply to Defendant's Opposition to Plaintiff's Motion for Attorney's Fees and Costs	68	JA010680- JA010722
09/11/2015	Plaintiffs' Reply to Defendant's Opposition to Plaintiff's Motion Pursuant to NRCP 52(b) and NRCP 59 to Amend the Court's Judgment Entered on June 15, 2015	68	JA010768- JA010811
09/11/2015	Plaintiffs' Reply to Defendant's Opposition to Plaintiff's Motion to Strike "Judgment" Entered June 15, 2015 Pursuant to NRCP 52(b) and NRCP 59	68	JA010723- JA010767
04/20/2016	Plaintiffs' Reply to Defendant's Response and Supplement to Plaintiffs' Motion to Settle Two (2) Sets of Competing Judgments and Orders	71	JA011271- JA011384

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04/27/2017	Plaintiffs' Response to Pardee's Motion to Stay Execution of Judgment and Post-Judgment Orders	88	JA014066- JA014068
05/10/2013	Plaintiffs Supplement to Motion for Leave to File a Second Amended Complaint Pursuant to the Courts order on Hearing on April 26, 2013	16	JA002627- JA002651
12/08/2015	Plaintiffs' Supplement to Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	68	JA010866- JA010895
09/27/2013	Plaintiffs Supplement to Their Opposition to Defendants Motion for Partial Summary Judgment	19-21	JA002988- JA003203
07/22/2013	Plaintiffs Supplemental Opposition to Defendants Motion in Limine to Plaintiffs Claim for Damages in the Form of Compensation for Time MIL 2	17	JA002787- JA002808
10/25/2013	Plaintiffs Trial Brief Pursuant to EDCR 7.27	31	JA004818- JA004847
06/19/2015	Plaintiffs, James Wolfram and Walt Wilkes' Memorandum of Costs and Disbursements	52	JA008159- JA008191
03/16/2016	Release of Judgment	71	JA011211- JA011213
01/07/2013	Reply Brief in Support of Defendant's Motion for Summary Judgment	13	JA002081- JA002101
09/16/2013	Reply in Support of Defendant's Motion for Partial Summary Judgment	17	JA002858- JA002864
09/16/2013	Reply in Support of Defendant's Motion in Limine to Exclude Plaintiff's Claim for Attorney's Fees as An Element of Damages	17	JA002865- JA002869

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09/16/2013	Reply in Support of Defendant's Motion in Limine to Exclude Plaintiffs' Claim for Damages in the Form of Compensation for Time	17	JA002870- JA002874
07/15/2014	Reply in Support of Pardee's Motion to Expunge Lis Pendens	48	JA007560- JA007570
08/17/2015	Reply Points and Authorities in Support of Motion for Reconsideration	67	JA010670- JA010678
11/08/2011	Scheduling Order	1	JA000028- JA000030
06/06/2013	Second Amended Complaint	16	JA002670- JA002677
04/17/2013	Second Amended Order Setting Civil Non-Jury Trial	16	JA002501- JA002502
12/15/2011	Stipulated Confidentiality Agreement and Protective Order	1	JA000033- JA000039
08/29/2012	Stipulation and Order to Extend Discovery Deadlines (First Request)	1	JA000051- JA000054
06/30/2015	Supplement to Plaintiffs' Pending Motion for Attorney's Fees and Costs, Motion to Strike Judgment, Motion Pursuant to NRCP 52(b) and NRCP 59 to Amend the Court's Judgment, and Plaintiffs' Opposition to Pardee's Motion for Attorney's Fees and Costs	59	JA009110- JA009206
09/27/2013	Supplemental Brief in Support of Defendant's Motion for Partial Summary Judgment	21	JA003204- JA003209
07/12/2007	Supplemental Order Regarding Plaintiffs' Entitlement to, and Calculation of, Prejudgment Interest	88	JA014106- JA014110

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03/05/2013	Transcript of Proceedings - March 5, 2013	14	JA002211- JA002350
10/25/2011	Transcript re Discovery Conference	1	JA000024- JA000027
08/27/2012	Transcript re Hearing	1	JA000049- JA000050
04/26/2013	Transcript re Hearing	16	JA002527- JA002626
07/09/2013	Transcript re Hearing	17	JA002688- JA002723
09/23/2013	Transcript re Hearing	18	JA002875- JA002987
07/17/2014	Transcript re Hearing	49	JA007579- JA007629
07/31/2014	Transcript re Hearing	49	JA007630- JA007646
07/10/2015	Transcript re Hearing	62	JA009734- JA009752
01/15/2016	Transcript re Hearing	70	JA010962- JA011167
08/15/2016	Transcript re Hearing - August 15, 2016	86	JA013445- JA013565
12/06/2012	Transcript re Status Check	13	JA002066- JA002080
07/23/2013	Transcript re Status Check	17	JA002809- JA002814
10/23/2013	Transcript re Trial	22	JA003213- JA003403

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10/24/2013	Transcript re Trial	29-30	JA004463- JA004790
10/28/2013	Transcript re Trial – filed under seal	32-33	JA004848- JA005227
10/29/2013	Transcript re Trial – filed under seal	35	JA005264- JA005493
10/30/2013	Transcript re Trial	37-38	JA005512- JA005815
12/09/2013	Transcript re Trial – filed under seal	40-41	JA005821- JA006192
12/10/2013	Transcript re Trial	42-43	JA006193- JA006530
12/12/2013	Transcript re Trial – filed under seal	44-45	JA006533- JA006878
12/13/2013	Transcript re Trial - Part 1	46	JA006953- JA007107
12/13/2013	Transcript re Trial - Part 2	47-48	JA007108- JA007384
10/23/2013	Trial Exhibit A	23	JA003404- JA003544
10/23/2013	Trial Exhibit B – filed under seal	23	JA003545- JA003625
10/23/2013	Trial Exhibit C	23	JA003626- JA003628
10/23/2013	Trial Exhibit D	23	JA003629- JA003631
10/23/2013	Trial Exhibit E – filed under seal	23	JA003632- JA003634

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10/23/2013	Trial Exhibit F	23	JA003635- JA003637
10/23/2013	Trial Exhibit G	23	JA003638
10/23/2013	Trial Exhibit H	23	JA003639- JA003640
10/23/2013	Trial Exhibit I	23	JA003641- JA003643
10/23/2013	Trial Exhibit J – filed under seal	24	JA003644- JA003669
10/23/2013	Trial Exhibit K	24	JA003670- JA003674
10/23/2013	Trial Exhibit L	24	JA003675- JA003678
10/23/2013	Trial Exhibit M	24	JA003679- JA003680
10/23/2013	Trial Exhibit N	24	JA003681- JA003683
10/23/2013	Trial Exhibit O – filed under seal	25-26	JA003684- JA004083
10/23/2013	Trial Exhibit P	27	JA004084
10/23/2013	Trial Exhibit Q	27	JA004085
10/23/2013	Trial Exhibit R	27	JA004086- JA004089
10/23/2013	Trial Exhibit S	27	JA004090

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10/23/2013	Trial Exhibit T	27	JA004091- JA004092
10/23/2013	Trial Exhibit U	27	JA004093
10/23/2013	Trial Exhibit V	27	JA004094
10/23/2013	Trial Exhibit W	27	JA004095- JA004096
10/23/2013	Trial Exhibit X	27	JA004097
10/23/2013	Trial Exhibit Y	27	JA004098
10/23/2013	Trial Exhibit Z	27	JA004099- JA004100
10/23/2013	Trial Exhibit 1	27	JA004289- JA004292
10/23/2013	Trial Exhibit 10 – filed under seal	27	JA004320- JA004329
10/23/2013	Trial Exhibit 11 – filed under seal	28	JA004330- JA004340
10/23/2013	Trial Exhibit 12 – filed under seal	28	JA004341- JA004360
10/23/2013	Trial Exhibit 13 – filed under seal	28	JA004361- JA004453
10/28/2013	Trial Exhibit 15	34	JA005228- JA005232
10/28/2013	Trial Exhibit 18	34	JA005233- JA005235

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10/28/2013	Trial Exhibit 19	34	JA005236- JA005237
10/28/2013	Trial Exhibit 20	34	JA005238- JA005254
10/23/2013	Trial Exhibit 21	28	JA004454
10/28/2013	Trial Exhibit 23	34	JA005255- JA005260
10/30/2013	Trial Exhibit 23a	39	JA005816- JA005817
10/28/2013	Trial Exhibit 24	34	JA005261- JA005263
10/23/2013	Trial Exhibit 25	28	JA004455- JA004462
10/24/2013	Trial Exhibit 26	31	JA004792- JA004804
10/30/2013	Trial Exhibit 27	39	JA005818- JA005820
10/29/2013	Trial Exhibit 28	36	JA005494- JA005497
10/29/2013	Trial Exhibit 29	36	JA005498- JA005511
10/24/2013	Trial Exhibit 30	31	JA004805- JA004811
12/13/2013	Trial Exhibit 31a	48	JA007385- JA007410
12/12/2013	Trial Exhibit 39	46	JA006936- JA006948

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12/12/2013	Trial Exhibit 40	46	JA006949- JA006950
12/12/2013	Trial Exhibit 41	46	JA006951- JA006952
10/23/2013	Trial Exhibit 6 – filed under seal	27	JA004293- JA004307
10/23/2013	Trial Exhibit 7 – filed under seal	27	JA004308- JA004310
10/23/2013	Trial Exhibit 8 – filed under seal	27	JA004311- JA004312
10/23/2013	Trial Exhibit 9 – filed under seal	27	JA004313- JA004319
10/23/2013	Trial Exhibit AA	27	JA004101- JA004102
10/23/2013	Trial Exhibit BB	27	JA004103
10/23/2013	Trial Exhibit CC	27	JA004104
10/23/2013	Trial Exhibit DD	27	JA004105
10/23/2013	Trial Exhibit EE	27	JA004106- JA004113
10/23/2013	Trial Exhibit FF	27	JA004114- JA004118
10/23/2013	Trial Exhibit GG	27	JA004119- JA004122
10/23/2013	Trial Exhibit HH	27	JA004123

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10/23/2013	Trial Exhibit II	27	JA004124
10/23/2013	Trial Exhibit JJ	27	JA004125
10/23/2013	Trial Exhibit KK	27	JA004126- JA004167
10/23/2013	Trial Exhibit LL	27	JA004168
10/23/2013	Trial Exhibit MM	27	JA004169
10/23/2013	Trial Exhibit NN	27	JA004170- JA004174
10/23/2013	Trial Exhibit OO	27	JA004175- JA004183
10/23/2013	Trial Exhibit PP	27	JA004184- JA004240
10/23/2013	Trial Exhibit QQ	27	JA004241- JA004243
10/23/2013	Trial Exhibit RR	27	JA004244- JA004248
10/23/2013	Trial Exhibit SS	27	JA004249- JA004255
10/23/2013	Trial Exhibit TT	27	JA004256- JA004262
10/23/2013	Trial Exhibit UU	27	JA004263- JA004288
10/24/2013	Trial Exhibit VV	31	JA004791

Date	Document Description	Volume	Labeled
12/10/2013	Trial Exhibit WW	43	JA006531- JA006532
12/12/2013	Trial Exhibit XX	46	JA006879- JA006935

Dated this 28th day of February, 2018.

McDONALD CARANO LLP

By: /s/ Rory T. Kay
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Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of McDonald Carano LLP, and on the 28th day of February, 2018, a true and correct copy of the foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system:

/s/ Beau Nelson

An Employee of McDonald Carano LLP

- 1 5. PARDEE HOMES OF NEVADA
2 Person Most Knowledgeable
3 McDonald Carano Wilson LLP
4 100 West Liberty Street, 10th Floor
5 Reno, Nevada 89501
6 (775) 788-2000

7 Pardee Homes of Nevada is a named Defendant in this matter. Its present or former
8 employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6)
9 and/or Person Most Knowledgeable are expected to testify regarding the facts and background
10 of this case.

- 11 6. Jon Lash
12 c/o McDonald Carano Wilson LLP
13 100 West Liberty Street, 10th Floor
14 Reno, Nevada 89501
15 (775) 788-2000

16 Mr. Lash is an employee of PARDEE HOMES OF NEVADA and is expected to testify
17 regarding the facts and background of this case.

- 18 7. Clifford Anderson
19 c/o McDonald Carano Wilson LLP
20 100 West Liberty Street, 10th Floor
21 Reno, Nevada 89501
22 (775) 788-2000

23 Mr. Anderson is an employee of PARDEE HOMES OF NEVADA and is expected to
24 testify regarding the facts and background of this case.

- 25 8. Harvey Whitmore
26 c/o Coyote Springs
27 Address Unknown

28 Mr. Whitmore is the owner of the property involved in this lawsuit and is expected to
testify regarding the facts and background of this case.

9. Chicago Title Company
Las Vegas, Nevada
Custodian of Records

The Custodian of Records is expected to testify regarding the facts and background of
this case.

10. Chicago Title Company
Las Vegas, Nevada
Person Most Knowledgeable

1 The Person Most Knowledgeable is expected to testify regarding the facts and
2 background of this case.

3
4 11. Peter J. Dingerson
5 D&W Real Estate
6 5455 S. Durango Dr., Ste 160
7 Las Vegas, NV 89113

8 Mr. Dingerson is the owner of D&W Real Estate and is expected to testify regarding the
9 facts and background of this case.

10
11 12. Jay Dana
12 General Realty Group
13 6330 S. Eastern Ave Ste 2
14 Las Vegas, NV 89119

15 Mr. Dana is the owner of General Realty Group Inc. and is expected to testify regarding
16 the facts and background of this case.

17
18 13. Jerry Masini
19 Award Realty Corp.
20 3015 S. Jones Blvd.
21 Las Vegas, NV 89146

22 Mr. Masini is the owner of Award Realty and is expected to testify regarding the
23 facts and background of this case.

24
25 14. Mark Carmen
26 Exit Realty Number One
27 6600 W. Charleston, Suite #119
28 Las Vegas, Nevada 89146

Mr. Carmen is the owner of Las Vegas Realty Center and is expected to testify
regarding the facts and background of this case.

Plaintiffs reserve the right to call any and all witnesses who may be disclosed or
deposed throughout the course of discovery.

Plaintiffs reserve the right to call any and all of Defendant's witnesses; and

Plaintiffs reserve the right to call any and all rebuttal witnesses.

Plaintiffs' experts, if any, as yet unidentified.

Plaintiffs reserve the right to supplement this list of witnesses as discovery
progresses and until the time of trial in this case.

II.

DOCUMENTS

Pursuant to NRCP 16.1(a)(1)(B), Plaintiffs provide the following documents relating to Plaintiffs and Defendants:

1. Any and all written agreements between the Parties;
2. Any and all documents evidencing damages to the Plaintiffs;
3. Any and all correspondence between the Parties;
4. Any and all appropriate Custodian of Record documents;
5. Any and all pleadings in this matter;

These documents are being reproduced as Plaintiffs' Initial NRCP 16.1 Disclosures of Witnesses and Documents had duplicate documents. The duplicate copies have been removed and the documents are listed as follows:

1. Option Agreement for the Purpose of Real Property and Joint Escrow Instructions dated May 2004 (Bates No. PLTF0001-0080);
2. Amended and Restated Option Agreement for the Purchase of Real Property and Joint Escrow Instructions dated March 28, 2005, (Bates No. PLTF0081-0152);
3. Two Assignments of Real Estate Commission and Personal Certification Agreement (Bates No. PLTF0153-0157A)
4. Letter dated September 2, 2004 from Pardee Homes to Mr. Walt Walkes regarding the attached Commission letter dated September 1, 2004, (Bates No. PLTF0158-0162);
5. Amendment No. 2 to Option Agreement for the Purchase of Real Property and Joint Escrow Instructions, (Bates No. PLTF0163-0174);
6. Letter dated April 6, 2009 from Pardee Homes to Mr. Jim Wolfram, (Bates No. PLTF0175-0179);
7. Letter dated April 23, 2009 from James J. Jimmerson, Esq., to Jim Stringer, Esq., (Bates No. PLTF0180-0187);
8. Letter dated May 19, 2011 from James J. Jimmerson, Esq., to Jim Stringer, Esq., (Bates No. PLTF0188-0191);
9. Letter dated July 10, 2009 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0192-0193);
10. Letter dated August 26, 2009 from James J. Jimmerson, Esq., to Charles E. Curtis, (Bates No. PLTF0194-0196);
11. Letter dated November 24, 2009 from Jon E. Lash to Mr. Jim Wolfram, (Bates No. PLTF0197-0202);

- 1 12. Letter dated April 21, 2010 from Jim Wolfram to Mr. Jon Lash, (Bates No. PLTF0203-0205);
- 2
- 3 13. Letter dated May 17, 2010 from James J. Jimmerson, Esq., to Mr. John E. Lash, (Bates No. PLTF0206-0209);
- 4
- 5 14. Letter dated June 14, 2010 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0210-0211);
- 6
- 7 15. Bates Nos. PLTF0212-0244 are the duplicative documents produced in Plaintiffs' Initial 16.1 Disclosure of Documents and Witnesses.
- 8
- 9 16. Documents produced by Stewart Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF0245-PLTF1423);
- 10
- 11 17. Documents produced by Chicago Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF1424-PLTF10414);
- 12
- 13 18. Documents produced by Coyote Springs Investments in response to Plaintiff's Duces Tecum on CD, (Bates No. CSI_Wolfram 000014 - CSI_Wolfram0003004), attached hereto;
- 14
- 15 19. Coyote Springs Investment, LLC's Privilege Log, (Bates No. PLTF10415 - PLTF10417), attached hereto;
- 16
- 17 20. Affidavit of Custodian of Records, (Bates No. PLTF10418-PLTF10419); attached hereto;
- 18
- 19 21. Non-Party Coyote Springs Investments, LLC's Supplement and Amended Objection and Response to Plaintiff's Subpoena Duces Tecum, (Bates PLTF10420-PLTF10424, attached hereto.
- 20
- 21 22. Chicago Title Company's previously bates stamped documents no. PLTF 1424 through PLTF 10414 (on bottom right of documents bates stamped) and rebated as bates nos: Cht 00001 through Cht 08998 (on bottom left of documents bates stamped), including the Custodian of Records Subpoena to Chicago Title Company including the executed Certificate of Custodian of Records bates stamped as Cht 08997.
- 22
- 23 23. Stewart Title Company's previously bates stamped documents no. PLTF 0245 through PLTF 1423 and rebated as bates nos: Stwt 0001 through 1202. Documents Stwt 0699 and Stwt 0731 are copy coversheets and were inadvertently bates stamped.
- 24
- 25 24. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 138, page 51, bates PLTF 10427 through PLTF 10438.
- 26
- 27 25. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 116, page 35, bates PLTF 10439 through PLTF 10440.
- 28
- 26 26. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 117, page 18, bates PLTF 10441 through PLTF 10443.
- 27
- 28 27. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 140, page 57, bates PLTF 10444 through PLTF10456.
- 28 28. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 113, page 55, bates PLTF 10457 through PLTF 10462.

29. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 98, page 57, bates PLTF 10463 through PLTF 10468.
30. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from November 3, 2010 through October 19, 2012, bates PLTF 10469 through PLTF 10481.
31. Affidavit of Peter J. Dingerson, bates PLTF 10482 through PLTF 10484.
32. Assignment of Rights, Title and Interest from Jay Dana on behalf of General Realty Group Inc. to Walt Wilkes, dated January 11, 2011, bates PLTF 10485.
33. Assignment of Rights, Title and Interest from Jerry Masini on behalf of Award Realty to James Wolfram, dated December 20, 2010, bates PLTF 10486.
34. Letter from Jeffrey King, M.D. dated November 1, 2011 regarding the health of Walt Wilkes, bates PLTF 10487.
35. Affidavit of Jerry Masini, bates PLTF 10488 through PLTF 10490.
36. Assignment signed by Mark Carmen dated December 3, 2012 along with Exhibit A signed by Jay Dana dated January 11, 2011, attached hereto as bates PLTF 10491 through PLTF 10493; and
37. Assignment signed by Peter J. Dingerson dated December 20, 2012 along with Exhibit A signed by Jerry Masini dated December 20, 2010, attached hereto as bates PLTF 10494 through PLTF 10496.
38. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from October 24, 2012 through February 21, 2013, bates PLTF 10497 through PLTF 10499.
39. Copy of redacted costs representing costs expended by Jimmerson Hansen, P.C. from December 29, 2010 through February 4, 2013 bates PLTF 10500 through PLTF 10505.
40. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from February 21, 2013 through March 29, 2013, bates PLTF 10506 through PLTF 10508.
41. Copy of redacted costs representing costs expended by Jimmerson Hansen, P.C. from February 27, 2013 through March 13, 2013 bates PLTF 10509 through 10510.
42. Copy of redacted billing sheets representing attorney's fees charged by Jimmerson Hansen, P.C. from April 1, 2013 through April 18, 2013, bates PLTF 10511 through PLTF 10512.
43. Color copy of the map as edited by James Wolfram, attached hereto as bates PLTF 10513.
44. Color copy the original map from Jon Lash to James Wolfram of the entire site, attached hereto as bates PLTF 10514.

1 45. Three (3) color copies of maps from James Wolfram to Jon Lash, originally
2 produced by your office on April 21, 2010, attached hereto as bates PLTF
10515-10517; and

3 46. A further detailed computation of the attorney fee damages is found at
4 Exhibit "1" attached hereto. Exhibit "1" is a collection of the previously
5 produced attorney's fees with the highlighted sections representing the
6 line items which were aggregated at 100% plus the non-highlighted line
7 items which were aggregated at 33.3% to equal \$102,160.00. The pink
8 highlighted line items represent those damages for a breach of contract
9 and breach of the implied covenant of good faith and fair dealing claims,
10 which total \$7,602.50.

11 Plaintiffs reserve the right to any and all documents the Defendants disclosed by any
12 parties or used at any depositions.

13 Plaintiffs reserve the right to any and all other relevant documents to this matter.

14 Plaintiffs reserve the right to identify and produce different and/or additional documents
15 as the investigation and discovery in this case proceeds.

16 III.

17 COMPUTATION OF DAMAGES

18 Plaintiffs calculate their damages to be in excess of \$1,900,000.00 associated with the
19 Defendant's breach of contract and the Defendant's failure to faithfully meet their obligations
20 to the Plaintiffs.

21 There are two primary components to this calculation. The first component is the loss
22 of future commissions from future sales or takedowns of property located in Clark County,
23 subject to the September 1, 2004 Commission Letter Agreement. There appears to be at least
24 3,000 acres of property, defined as Option Property under the Option Agreement effective
25 June 1, 2004, currently owned by Coyote Springs Investment, LLC in Township 13 South,
26 Range 63 East M.D.M., Clark County, Nevada. Under the Option Agreement effective June
27 1, 2004, these 3,000 acres can be purchased by Pardee and designated as Production
28 Residential Property—a purchase and designation that would entitle Plaintiffs to a 1.5%
commission on a per-acre price of \$40,000.00. If 3,000 acres were purchased by Pardee
under this scenario, Plaintiffs would be entitled to \$1,800,000 in commissions. However,
Pardee's course of conduct in failing to appropriately discharge its duties under the
Commission Letter Agreement has robbed Plaintiffs of this opportunity to be paid these

1 commissions. Pardee's actions have served to reclassify the land originally labeled as
2 Purchase Property and Option Property, and under the new reclassification, all Option
3 Property has been removed from Clark County, thereby divesting Plaintiffs of any hope to
4 collect any part of the \$1.8 million in commissions they could be paid had no reclassification
5 occurred.

6 The second component of this calculation is attorney's fees. Plaintiffs' attorney's fees
7 and costs currently exceed \$146,000.00. This amount represents all work from the date of
8 drafting of the Complaint in November 2010 through April 20, 2013. Plaintiffs' attorney's fees
9 and costs constitute damages pursuant to the September 1, 2004 Commission Letter
10 Agreement. As stated in the Agreement, "In the event, either party brings an action to enforce
11 its rights under this Agreement, the prevailing party shall be awarded reasonable attorneys'
12 fees and costs." Plaintiffs in bringing this suit expect to be the prevailing party and, as such,
13 are entitled to their reasonable attorney's fees as damages for Defendant's breach of contract,
14 breach of the covenant of good faith and fair dealing, and for compelling the accounting due
15 to Plaintiffs.

16 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
17 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
18 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
19 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for
20 accounting, and seeking documents owed to Plaintiffs under the September 1, 2004
21 Commission Letter Agreement (for the breach of contract and breach of the covenant of good
22 faith and fair dealing claims) plus one-third of the fees and costs incurred for the prosecution
23 of all of the claims (as one of the three claims is for an accounting for which all of Plaintiffs'
24 fees are damages). Exempt from the damages are fees in connection with the prosecution
25 of the breach of contract and breach of the implied covenant of good faith and fair dealing
26 claims, specifically not in furtherance of the recovery of documents. To date, Plaintiffs'
27 attorney fee damages are greater than or equal to: **\$102,160.00**. Specifically, Plaintiffs'
28 attorney fee damages for the accounting claim equal or exceed **\$102,160.00**; for the claim for
the breach of contract equal or exceed **\$7,602.50**; and for the claim for the breach of the

1 implied covenant of good faith and fair dealing claims equal or exceed **\$7,602.50**.

2 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
3 discover from public records what information was owed to them under the Commission Letter
4 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
5 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
6 \$6,400.00 for their time.

7 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
8 supplement this response as the investigation and discovery in this case proceeds.

9 Dated this 31st day of May, 2013.

JIMMERSON HANSEN, P.C.


JAMES J. JIMMERSON, ESQ.

Nevada Bar No. 000264

LYNN M. HANSEN, ESQ.

Nevada Bar No. 0244

JAMES M. JIMMERSON, ESQ.

Nevada Bar No. 12599

415 So. Sixth St., Ste. 100

Las Vegas, NV 89101

Attorney for Plaintiffs

James Wolfram and Walt Wilkes

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1167

RECEIPT OF COPY

I, the undersigned, is hereby in receipt of copy of the foregoing PLAINTIFFS' TENTH
SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS on the
31st day of May, 2013.

McDONALD CARANO WILSON, LLP



PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada

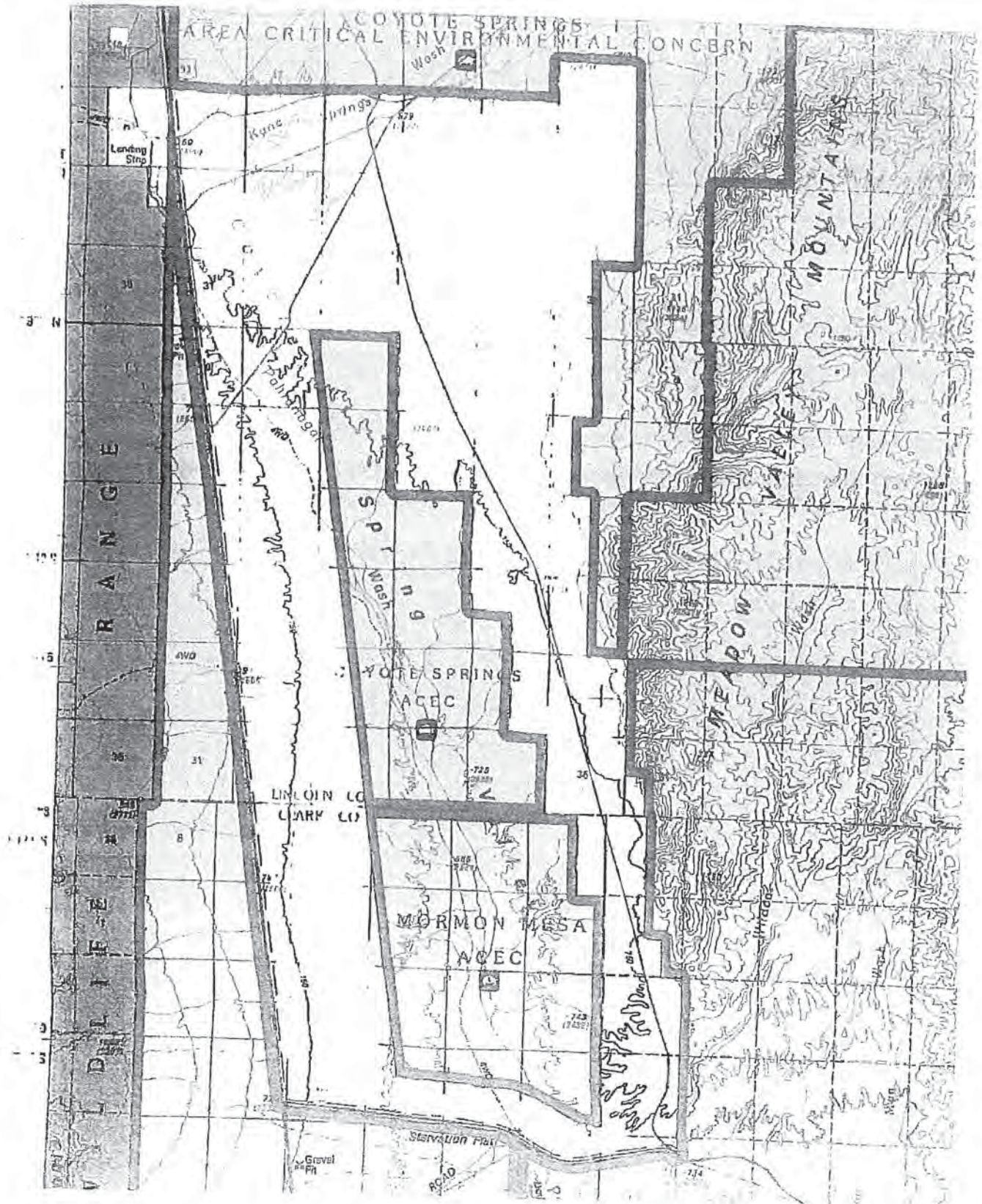
ONE HUND NEVADA HIGHWAY

12' 42

--- REALIGNMENT

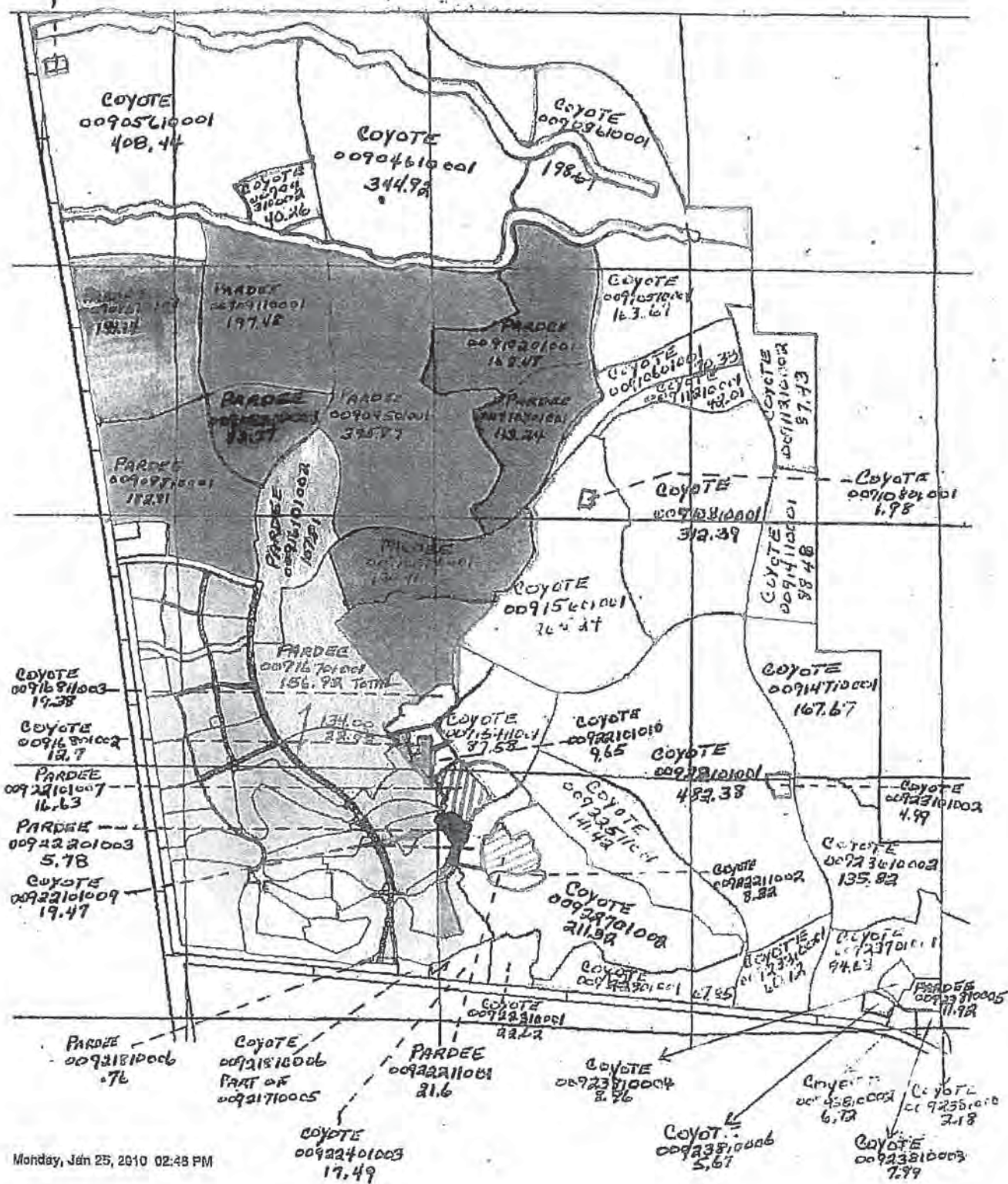


VERTON, NEVADA-ARIZON



PLTF10514

JA008810



SALES

1. [REDACTED] - PARDEE - 11.17 ACRES - 00909110001 - \$1,133,744.47
2. [REDACTED] - PARDEE - 177.45 ACRES - 00909110001 - \$1,133,744.47

$$\frac{375.57 \text{ ACRES} - 00909501001}{776.16}$$
3. [REDACTED] - PARDEE - 2.77 ACRES - 00909110001 - \$1,133,744.47
4. [REDACTED] - PARDEE - 16.48 ACRES - 00910301001 - \$11,685,532.46

$$\frac{113.14 \text{ ACRES} - 00910301001}{412.13}$$
5. YELLOW - PARDEE - 11.13 ACRES - 00910301001 - \$11,685,532.46
6. [REDACTED] - PARDEE - 107.01 ACRES - 00910301001 - \$11,685,532.46
7. PINK - PARDEE - 134.00 ACRES - 00910301001 - \$11,685,532.46

$$\frac{42.10 \text{ ACRES} - 00910301001}{156.92}$$
8. ORANGE - PARDEE - 91 ACRES - 00916601001 - \$11,685,532.46
9. [REDACTED] - PARDEE - 16.63 ACRES - 00922101007
10. [REDACTED] - PARDEE - 5.78 ACRES - 00922101003
11. [REDACTED] - PARDEE - 21.6 ACRES - 00922211001

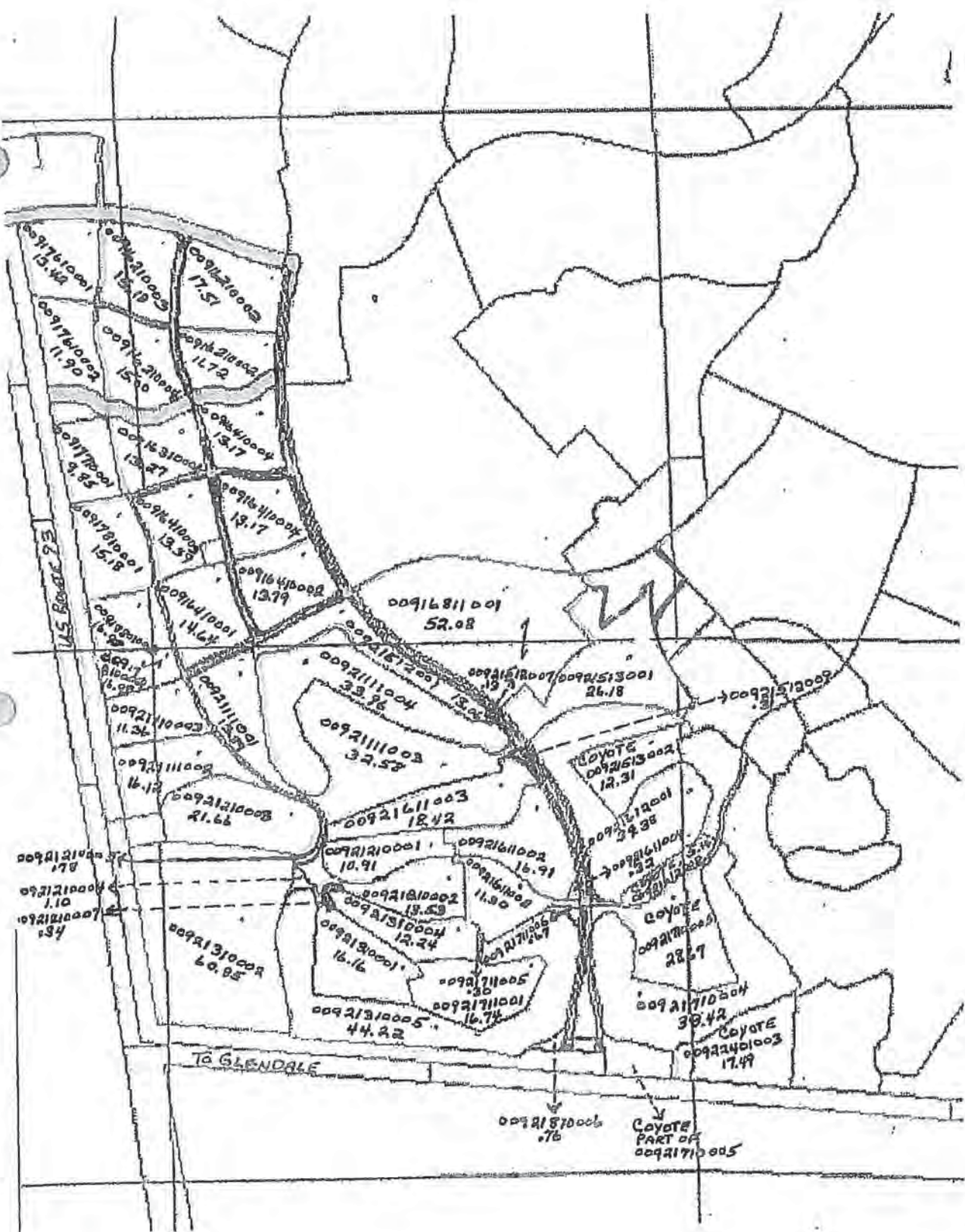


EXHIBIT “1”

EXHIBIT “1”

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page:

Client	Trans Date	Stmt H Date	Rate	Hours to Bill	Amount	Ref
Client ID 4886.01 WILKES/ WOLFGRAM						
4886.01	11/03/2010	11/21/2010 A	175.00	4.00	700.00	ARCH
4886.01	11/04/2010	11/21/2010 A	175.00	6.50	1,137.50	ARCH
4886.01	11/05/2010	11/21/2010 A	175.00	1.50	262.50	ARCH
4886.01	11/05/2010	11/21/2010 A	550.00	2.00	1,100.00	ARCH
4886.01	12/20/2010	12/21/2010 A	550.00	2.00	1,100.00	ARCH
4886.01	12/20/2010	12/21/2010 A			-1,000.00	ARCH
					COURTESY DISCOUNT PER JAMES J. JIMMERSON. ESQ.	
4886.01	12/27/2010	01/21/2011 A	550.00	2.00	0.00	ARCH
					Revised final draft of Complaint. Ready for filing. (NO CHARGE)	
4886.01	12/28/2010	01/21/2011 A	550.00	2.00	0.00	ARCH
4886.01	12/29/2010	01/21/2011 A	550.00	1.00	0.00	ARCH
					Filed Complaint (NO CHARGE)	
4886.01	01/03/2011	01/21/2011 A	550.00	0.50	275.00	ARCH
4886.01	01/14/2011	01/21/2011 A	175.00	1.10	192.50	ARCH
					Complaint filed today; Service is sent out for effectuation. (NO CHARGE)	
4886.01	01/20/2011	01/21/2011 A	175.00	0.40	70.00	ARCH
4886.01	04/01/2011	04/21/2011 A	550.00	1.00	550.00	ARCH
4886.01	08/15/2011	08/21/2011 A	350.00	1.50	525.00	ARCH
					Draft and send 16.1 Case Conference Notice and draft and send email	
4886.01	08/16/2011	08/21/2011 A	550.00	0.20	110.00	ARCH
					Phone call with client	
4886.01	08/16/2011	08/21/2011 A	350.00	1.20	420.00	ARCH
					Receipt and review from ; Discussion with M. Gi	
4886.01	08/18/2011	08/21/2011 A	350.00	1.50	525.00	ARCH
					Discussion with M. G concerning Receive and review email correspondence from [
4886.01	08/19/2011	08/21/2011 A	100.00	1.50	150.00	ARCH
					Draft and send response ; Draft and finalize 16.1 List; call to I regarding	
4886.01	08/19/2011	08/21/2011 A	550.00	2.50	1,375.00	ARCH
					Prepare for Rule 16.1 Case Conference; attend Rule 16.1 Case Conference; prepare Request for Production of Documents; redrafting of Requests.	
4886.01	08/19/2011	08/21/2011 A	350.00	2.00	700.00	ARCH
					Preparation for 16.1 Conference; Discussions with J. ; Discussion and instruction with J. ; Editing of Witness List; Search of file and production of documents for 16.1; Attendance at/a 16.1	
4886.01	08/22/2011	09/21/2011 A	100.00	0.50	50.00	ARCH
					Telephone call from Mr Wolfram regarding	

PLTF10469

JA008815

Thursday 10/25/2012 4:11 pm

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page:

Client	Trans Date	Stmt Date	Rate	Hours to Bill	Amount	Ref.
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	08/22/2011	09/21/2011 A	350.00	0.40	140.00	Receipt and review of correspondence; Discussion with email concerning
4886.01	08/30/2011	09/21/2011 A	350.00	0.20	70.00	Draft and send correspondence concerning
4886.01	09/06/2011	09/21/2011 A	450.00	1.00	450.00	Review Pleadings File and Nature of Act
4886.01	09/06/2011	09/21/2011 A	350.00	1.00	350.00	Discussion with wherein told
						discussion with
						Call and
						Draft and send email to
4886.01	09/08/2011	09/21/2011 A	450.00	2.50	1,125.00	Review file
4886.01	09/12/2011	09/21/2011 A	100.00	2.50	250.00	Draft JCCR
4886.01	09/12/2011	09/21/2011 A	550.00	2.00	1,100.00	Conference with regarding
4886.01	09/13/2011	09/21/2011 A	300.00	0.50	150.00	Meeting with Lynn M. Hansen, Esq. and Phillip Odunze, Esq.
4886.01	09/13/2011	09/21/2011 A	450.00	0.50	225.00	Meeting with Phillip Odunze, Esq.
4886.01	09/13/2011	09/21/2011 A	100.00	0.60	60.00	Continue draft of JCCR
4886.01	09/15/2011	09/21/2011 A	450.00	1.00	450.00	Review documents disclosed in 16.1; Draft Supplemental Disclosure
4886.01	09/15/2011	09/21/2011 A	450.00	0.50	225.00	Revise Joint Case Conference Report
4886.01	09/19/2011	09/21/2011 A	450.00	0.50	225.00	Final draft of 1st Supplement to 16.1 Disclosure
4886.01	09/26/2011	10/21/2011 A	450.00	0.20	90.00	Conference with Amanda J. Brookhyser, Esq. regarding
4886.01	10/05/2011	10/21/2011 A	550.00	0.40	220.00	Schedule of depositions of our clients; Conference with client to be scheduled
4886.01	10/13/2011	10/21/2011 A	350.00	1.50	525.00	Document review and conference with Lynn M. Hansen, Esq. and James J. Jimmerson, Esq. in preparation for
4886.01	10/13/2011	10/21/2011 A	350.00	1.50	525.00	Meeting with James J. Jimmerson, Esq., Lynn M. Hansen, Esq. and client to
4886.01	10/13/2011	10/21/2011 A	450.00	1.50	675.00	Review file for meeting
4886.01	10/13/2011	10/21/2011 A	450.00	1.00	450.00	Attend Meeting
4886.01	10/13/2011	10/21/2011 A	550.00	1.00	550.00	Conference with Jim Wolfram
4886.01	10/14/2011	10/21/2011 A	450.00	1.50	675.00	Meeting with James J. Jimmerson, Esq. and Amanda J. Brookhyser, Esq. regarding
4886.01	10/14/2011	10/21/2011 A	550.00	1.80	990.00	Outline of
4886.01	10/24/2011	11/21/2011 A	175.00	0.30	52.50	Document review for Hearing in front of Discovery Commissioner
4886.01	10/25/2011	11/21/2011 A	450.00	0.25	112.50	Conference with Amanda J. Brookhyser, Esq.

PLTF10470

JA008816

Thursday 10/25/2012 4:11 pm

Detail Fee Transaction File List
JIMMERSON HANSEN, P.C.

Page: 1

Client	Trans Date	Stmt H Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	10/25/2011	11/21/2011 A	175.00	1.30	227.50	ARCH
4886.01	10/25/2011	11/21/2011 A	175.00	4.50	787.50	ARCH
4886.01	10/25/2011	11/21/2011 A	550.00	0.50	275.00	ARCH
4886.01	10/26/2011	11/21/2011 A	450.00	0.50	225.00	ARCH
4886.01	10/26/2011	11/21/2011 A	450.00	1.25	562.50	ARCH
4886.01	10/26/2011	11/21/2011 A	175.00	3.00	525.00	ARCH
4886.01	10/26/2011	11/21/2011 A	175.00	0.50	87.50	ARCH
4886.01	10/26/2011	11/21/2011 A	175.00	1.00	175.00	ARCH
4886.01	10/26/2011	11/21/2011 A	175.00	4.00	700.00	ARCH
4886.01	10/27/2011	11/21/2011 A	175.00	0.20	35.00	ARCH
4886.01	10/27/2011	11/21/2011 A	175.00	0.50	87.50	ARCH
4886.01	10/28/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	10/28/2011	11/21/2011 A	100.00	0.50	50.00	ARCH
4886.01	10/28/2011	11/21/2011 A	450.00	0.50	225.00	ARCH
4886.01	10/31/2011	11/21/2011 A	100.00	0.10	10.00	ARCH
4886.01	11/01/2011	11/21/2011 A	100.00	0.10	10.00	ARCH
4886.01	11/02/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	11/02/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	11/02/2011	11/21/2011 A	175.00	0.20	35.00	ARCH
4886.01	11/02/2011	11/21/2011 A	175.00	0.30	52.50	ARCH
4886.01	11/02/2011	11/21/2011 A	175.00	0.20	35.00	ARCH
4886.01	11/03/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	11/03/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	11/03/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
4886.01	11/03/2011	11/21/2011 A	100.00	0.10	10.00	ARCH
4886.01	11/03/2011	11/21/2011 A	175.00	0.30	52.50	ARCH
4886.01	11/03/2011	11/21/2011 A	175.00	0.30	52.50	ARCH

PLTF10471

JA008817

Thursday 10/25/2011 4:11 pm

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmnt Date	H	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	11/03/2011	11/21/2011	A	175.00	0.50	87.50	ARCH
						Edit Subpoena Duces Tecum to Chicago Title, Stewart Title and Coyote Springs, LLC	
4886.01	11/04/2011	11/21/2011	A	100.00	0.20	20.00	ARCH
						Made changes to Subpoenas (x3).	
4886.01	11/04/2011	11/21/2011	A	450.00	1.75	787.50	ARCH
						Meeting with J. Wolfram and W. Wilkes	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Made revisions from James J. Jimmerson, Esq. to Subpoena to Custodian of Records of Stewart Title.	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Made revisions from James J. Jimmerson, Esq. to Subpoena for Custodian of Records of Chicago Title.	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Made revisions from James J. Jimmerson, Esq. to Subpoena for Custodian of Records of Coyote Springs.	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Drafted Notice of Taking Deposition - Custodian of Records of Stewart Title.	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Drafted Notice of Taking Deposition - Custodian of Records of Chicago Title.	
4886.01	11/06/2011	11/21/2011	A	100.00	0.10	10.00	ARCH
						Drafted Notice of Taking Deposition - Custodian of Records of Coyote Springs.	
4886.01	11/07/2011	11/21/2011	A	450.00	3.00	1,350.00	ARCH
						Meeting with Amanda J. Brookhyser, Esq. and James J. Jimmerson, Esq.; analyse new	
4886.01	11/07/2011	11/21/2011	A	100.00	1.75	175.00	ARCH
						Prepare documents for	
4886.01	11/07/2011	11/21/2011	A	175.00	1.50	262.50	ARCH
						Review additional documents provided by client in	
4886.01	11/07/2011	11/21/2011	A	175.00	2.20	385.00	ARCH
						Attend depo prep meeting with clients and LMH and WW	
4886.01	11/07/2011	11/21/2011	A	175.00	0.30	52.50	ARCH
						Edit and finalize subpoenas to Chicago Title, Coyote Springs and Stewart Title.	
4886.01	11/07/2011	11/21/2011	A	175.00	3.30	577.50	ARCH
						Conference with LMH and JJJ regarding	
4886.01	11/07/2011	11/21/2011	A	450.00	2.20	990.00	ARCH
						Meeting with Walter Wilkes for	
4886.01	11/08/2011	11/21/2011	A	450.00	2.30	1,035.00	ARCH
						Attend deposition of Plaintiff Jim Wolfram	
4886.01	11/08/2011	11/21/2011	A	450.00	1.00	450.00	ARCH
						Office Conference with client	
4886.01	11/08/2011	11/21/2011	A	450.00	0.30	135.00	ARCH
						Review Subpoenas and Custodian of Records Notices.	
4886.01	11/08/2011	11/21/2011	A	175.00	1.30	227.50	ARCH
						Meet with clients and JJJ before	
4886.01	11/08/2011	11/21/2011	A	175.00	5.00	875.00	ARCH
						Attend and defend deposition of James Wolfram	
4886.01	11/08/2011	11/21/2011	A	550.00	1.50	825.00	ARCH
						Prepared	
4886.01	11/09/2011	11/21/2011	A	175.00	0.20	35.00	ARCH
						Draft email to Wilkes re f	
4886.01	11/10/2011	11/21/2011	A	450.00	0.50	225.00	ARCH
						Revise subpoena to Title Company and ISI	
4886.01	11/14/2011	11/21/2011	A	450.00	1.25	562.50	ARCH
						Prepare Requests for Production	

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page: 5

Client	Trans Date	Stmt H Date P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/WOLFRAM						
4886.01	11/14/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
					Drafted Amended Notice of Taking Deposition of the Custodian of Records of Chicago. Title: sent to opposing counsel.	
4886.01	11/14/2011	11/21/2011 A	100.00	0.20	20.00	ARCH
					Drafted Amended Subpoena to the Custodian of Records of Chicago. Title: sent out for service.	
4886.01	11/14/2011	11/21/2011 A	175.00	0.10	17.50	ARCH
					Draft email to client re	
4886.01	11/15/2011	11/21/2011 A	450.00	0.75	337.50	ARCH
					Edit Request for Production	
4886.01	11/18/2011	11/21/2011 A	450.00	2.50	1,125.00	ARCH
					Review changes of deposition of James Wolfram	
4886.01	11/21/2011	12/21/2011 A	175.00	1.50	262.50	ARCH
					Telephone conference with Walt Wilkes to	
4886.01	11/22/2011	12/21/2011 A	175.00	0.20	35.00	ARCH
					Phone call with Walt Wilkes.	
4886.01	11/22/2011	12/21/2011 A	175.00	0.20	35.00	ARCH
					Phone conference with Wolfram regarding	
4886.01	11/22/2011	12/21/2011 A	100.00	0.20	20.00	ARCH
					Gather documents for meeting on Sunday with Walt Wilkes.	
4886.01	11/23/2011	12/21/2011 A	175.00	1.50	262.50	ARCH
					Phone conference with client Wilkes regarding	
4886.01	11/23/2011	12/21/2011 A	100.00	0.20	20.00	ARCH
					Phone call with counsel of Coyote Springs Investments regarding	
4886.01	11/25/2011	12/21/2011 A	175.00	1.00	175.00	ARCH
					Phone conference with client Wilkes regarding	
4886.01	11/25/2011	12/21/2011 A	175.00	0.80	140.00	ARCH
					Review deposition transcript of James Wolfram and draft email to Wilkes	
4886.01	11/27/2011	12/21/2011 A	450.00	2.20	990.00	ARCH
					Meeting with client regarding	
4886.01	11/28/2011	12/21/2011 A	450.00	3.50	1,575.00	ARCH
					To Deposition with client	
4886.01	11/28/2011	12/21/2011 A	450.00	0.50	225.00	ARCH
					Review Walt Wilkes' documents	
4886.01	11/28/2011	12/21/2011 A	450.00	0.25	112.50	ARCH
					Conference with James J. Jimmerson, Esq. regarding	
4886.01	11/28/2011	12/21/2011 A	175.00	0.30	52.50	ARCH
					Research with JD regarding ; emails with Lynn M. Hansen, Esq. regarding	
4886.01	11/28/2011	12/21/2011 A	175.00	0.30	52.50	ARCH
					Review documents sent by Wilkes; respond to several emails from Lynn M. Hansen, Esq. regarding	
4886.01	11/28/2011	12/21/2011 A	175.00	0.10	17.50	ARCH
					Conference with Lynn M. Hansen, Esq. regarding	
4886.01	11/28/2011	12/21/2011 A	175.00	0.20	35.00	ARCH
					Phone call with opposing counsel regarding	
4886.01	11/28/2011	12/21/2011 A	175.00	0.30	52.50	ARCH
					Review non-opposition to Motion for Preferential Trial	

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Client ID 4886.01 WILKES/ WOLFRAM									
4886.01		11/28/2011	12/21/2011	A		100.00	0.30	30.00	ARCH
4886.01		11/28/2011	12/21/2011	A		100.00	0.20	20.00	ARCH
4886.01		11/28/2011	12/21/2011	A		100.00	0.20	20.00	ARCH
4886.01		11/28/2011	12/21/2011	A		100.00	0.20	20.00	ARCH
4886.01		11/29/2011	12/21/2011	A		450.00	0.20	90.00	ARCH
4886.01		11/29/2011	12/21/2011	A		450.00	0.40	180.00	ARCH
4886.01		11/30/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		11/30/2011	12/21/2011	A		100.00	0.20	20.00	ARCH
4886.01		11/30/2011	12/21/2011	A		450.00	1.50	675.00	ARCH
4886.01		11/30/2011	12/21/2011	A		450.00	0.25	112.50	ARCH
4886.01		12/01/2011	12/21/2011	A		175.00	0.40	70.00	ARCH
4886.01		12/01/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		12/01/2011	12/21/2011	A		175.00	0.50	87.50	ARCH
4886.01		12/02/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		12/02/2011	12/21/2011	A		100.00	0.30	30.00	ARCH
4886.01		12/05/2011	12/21/2011	A		100.00	0.20	20.00	ARCH
4886.01		12/05/2011	12/21/2011	A		100.00	0.10	10.00	ARCH
4886.01		12/06/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		12/06/2011	12/21/2011	A		175.00	0.20	35.00	ARCH
4886.01		12/06/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		12/06/2011	12/21/2011	A		175.00	0.10	17.50	ARCH
4886.01		12/06/2011	12/21/2011	A		100.00	0.20	20.00	ARCH

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Client	Trans Date	Stmnt Date	H P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	12/07/2011	12/21/2011	A	450.00	0.20	Stewart Title: Subpoena to Stewart Title. Review trial setting	ARCH
4886.01	12/07/2011	12/21/2011	A	175.00	0.40	Meet with Jim Wolfram to discuss	ARCH
4886.01	12/07/2011	12/21/2011	A	100.00	0.50	Begin drafting memo to Lynn M. Hansen, Esq., Amanda J. Brookhyser, Esq. regarding	ARCH
4886.01	12/08/2011	12/21/2011	A	450.00	1.00	Revise 2nd Request for Production	ARCH
4886.01	12/08/2011	12/21/2011	A	175.00	0.30	Review edited version of confidentiality agreement from Opposing Counsel; draft several emails to opposing counsel.	ARCH
4886.01	12/08/2011	12/21/2011	A	100.00	0.20	Finish drafting memo to Lynn M. Hansen, Esq. and Amanda J. Brookhyser, Esq. regarding	ARCH
4886.01	12/08/2011	12/21/2011	A	100.00	0.20	Prepare Subpoena and Notice of Taking Deposition of Custodian of Records of Stewart Title for service.	ARCH
4886.01	12/13/2011	12/21/2011	A	175.00	0.20	Conference with JD regarding	ARCH
4886.01	12/13/2011	12/21/2011	A	175.00	0.30	Conduct research on Secretary of State website and conference with Lynn M. Hansen, Esq. regarding	ARCH
4886.01	12/13/2011	12/21/2011	A	175.00	0.40	Conference with JD and Lynn M. Hansen, Esq. regarding	ARCH
4886.01	12/13/2011	12/21/2011	A	100.00	0.20	Make - from Lynn M. Hansen, Esq. and client to	ARCH
4886.01	12/14/2011	12/21/2011	A	175.00	0.30	Review - from Wolfram deposition conference with Lynn M. Hansen, Esq. regarding	ARCH
4886.01	12/19/2011	12/21/2011	A	175.00	0.10	Draft email to client Wilkes regarding	ARCH
4886.01	12/20/2011	12/21/2011	A	100.00	0.20	Draft letter to Linda Jones from Stewart Title regarding	ARCH
4886.01	12/20/2011	12/21/2011	A	100.00	0.10	Email to Litigation Services attaching Certificate of Dependent.	ARCH
4886.01	12/22/2011	01/21/2012	A	175.00	0.20	Phone call with Walt Wilkes regarding	ARCH
4886.01	12/27/2011	01/21/2012	A	175.00	0.20	Conference with LH regarding	ARCH
4886.01	12/27/2011	01/21/2012	A	175.00	0.50	Review - Wilkes' deposition	ARCH
4886.01	12/28/2011	01/21/2012	A	450.00	0.90	Review Walt Wilkes deposition.	ARCH
4886.01	01/06/2012	01/21/2012	A	175.00	0.10	Draft email to opposing counsel regarding	ARCH

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Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmt Date	H	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	01/06/2012	01/21/2012	A	450.00	0.30	135.00	ARCH
4886.01	01/10/2012	01/21/2012	A	175.00	0.50	87.50	ARCH
						Reviewed revised changes to deposition transcript	
						Review objections from Coyote Springs to Subpoena; begin draft of amended subpoena to address email to team regarding	
4886.01	01/10/2012	01/21/2012	A	450.00	0.50	225.00	ARCH
4886.01	01/11/2012	01/21/2012	A	175.00	0.30	52.50	ARCH
						Review objections from Coyote Springs to subpoena	
						Conference with Shanana Polselli regarding	
4886.01	01/11/2012	01/21/2012	A	175.00	1.00	175.00	ARCH
						Conference with Lynn M. Hansen, Esq. regarding	
4886.01	01/11/2012	01/21/2012	A	450.00	1.00	450.00	ARCH
						Conference with Amanda J. Brookhyser, Esq. regarding	
4886.01	01/18/2012	01/21/2012	A	175.00	1.00	175.00	ARCH
4886.01	01/18/2012	01/21/2012	A	175.00	0.50	87.50	ARCH
						Begin drafting initial draft of deficiency letter to Pardee.	
						Review Plaintiff's responses to second set of Requests for Production.	
4886.01	01/18/2012	01/21/2012	A	175.00	0.50	87.50	ARCH
						Conference with LH and JD regarding	
4886.01	01/18/2012	01/21/2012	A	175.00	1.20	210.00	ARCH
4886.01	01/19/2012	01/21/2012	A	175.00	0.30	52.50	ARCH
						Conduct research for	
						Phone call with Chicago Title's Counsel regarding	
4886.01	01/19/2012	01/21/2012	A	175.00	0.40	70.00	ARCH
						Conduct additional research for	
4886.01	01/19/2012	01/21/2012	A	175.00	3.30	577.50	ARCH
						Complete first draft of letter to opposing counsel addressing	
4886.01	01/19/2012	01/21/2012	A	175.00	0.40	70.00	ARCH
						Phone call with opposing counsel regarding	
4886.01	01/19/2012	01/21/2012	A	450.00	0.50	225.00	ARCH
4886.01	01/20/2012	01/21/2012	A	450.00	0.50	225.00	ARCH
						Review Plaintiff's responses to discovery	
						Review letter to Plaintiff's counsel regarding	
4886.01	01/23/2012	02/21/2012	A	450.00	1.00	450.00	ARCH
						Revise Discovery letter and Responses to Request for	

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Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmt Date	H	P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM								
4886.01	01/30/2012	02/21/2012	A		100.00	6.00	600.00	ARCH
							Production Prepare working binders for Lynn M. Hansen, Esq. of documents from Stewart Title.	
4886.01	02/06/2012	02/21/2012	A		450.00	0.20	90.00	ARCH
4886.01	02/06/2012	02/21/2012	A		300.00	2.50	750.00	ARCH
							Review 3rd Supplemental Disclosure. Begin review of documents produced by Chicago Title consists of 9 notebooks	
4886.01	02/09/2012	02/21/2012	A		450.00	2.50	1,125.00	ARCH
4886.01	02/28/2012	03/21/2012	A		450.00	0.30	135.00	ARCH
4886.01	03/22/2012	04/21/2012	A		300.00	0.20	60.00	ARCH
							Telephone call with Harvey Whittemore Review correspondence from Opposing Counsel regarding	
4886.01	03/22/2012	04/21/2012	A		300.00	0.20	60.00	ARCH
							Conference with Jessica Dennis and Lori Harrison regarding	
4886.01	03/22/2012	04/21/2012	A		450.00	0.20	90.00	ARCH
4886.01	03/29/2012	04/21/2012	A		300.00	0.50	150.00	ARCH
							Review correspondence regarding Go though Request for Productions with Jessica Dennis to designate	
4886.01	04/16/2012	04/21/2012	A		300.00	2.00	600.00	ARCH
4886.01	05/18/2012	05/21/2012	A		450.00	2.50	1,125.00	ARCH
4886.01	05/20/2012	05/21/2012	A		450.00	3.00	1,350.00	ARCH
4886.01	05/24/2012	06/29/2012	A		450.00	1.00	450.00	ARCH
4886.01	06/22/2012	07/21/2012	A		450.00	1.75	787.50	ARCH
4886.01	07/12/2012	07/21/2012	A		450.00	2.00	900.00	ARCH
4886.01	07/17/2012	07/21/2012	A		450.00	0.25	112.50	ARCH
							Review file for Motion to Review agreement with Stewart Title Meeting with James M. Jimmerson, Esq. regarding	
4886.01	07/17/2012	07/21/2012	A		300.00	5.70	1,710.00	ARCH
4886.01	07/19/2012	07/21/2012	A		300.00	2.00	600.00	ARCH
4886.01	07/20/2012	07/21/2012	A		300.00	2.00	600.00	ARCH
							Review of the documents produced by Stewart Title. Review of the document production by Stewart Title. Drafting Motion	
4886.01	07/23/2012	08/27/2012	A		300.00	0.40	120.00	ARCH
							Call with Pisanelli & Bice regarding	
4886.01	07/23/2012	08/27/2012	A		450.00	0.25	112.50	ARCH
							Telephone conference with clients and James M. Jimmerson, Esq.	
4886.01	07/24/2012	08/27/2012	A		300.00	0.20	60.00	ARCH
							Phone call with Pisanelli & Bice regarding	
4886.01	07/26/2012	08/27/2012	A		300.00	4.00	1,200.00	ARCH
4886.01	07/27/2012	08/27/2012	A		300.00	0.20	60.00	ARCH
							Draft Motion to Compel for third party discovery. Phone call with J. Pisanelli regarding	
4886.01	07/27/2012	08/27/2012	A		300.00	0.20	60.00	ARCH
4886.01	08/02/2012	08/27/2012	A		300.00	2.00	600.00	ARCH
							Call with James Pisanelli regarding Call with Migali Wysong regarding	

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Client	Trans Date	Stmt Date	H	P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/WOLFRAM	08/03/2012	08/27/2012	A		300.00	1.00	300.00	ARCH-
4886.01							Resolving the Subpoena issues with Migali Wysong and	ARCH-
4886.01	08/08/2012	08/27/2012	A		300.00	3.00	900.00	ARCH-
4886.01	08/09/2012	08/27/2012	A		300.00	1.00	300.00	ARCH-
4886.01	08/10/2012	08/27/2012	A		450.00	1.00	450.00	ARCH-
4886.01	08/17/2012	08/27/2012	A		550.00	1.00	0.00	ARCH-
							Telephone conference with J. Wolfram: Telephone conference with Lynn M. Hansen, Esq.	
							1.(NO	
							CHARGE)	
4886.01	08/21/2012	09/21/2012	A		300.00	0.50	150.00	ARCH
4886.01	08/24/2012	09/21/2012	A		300.00	0.10	30.00	ARCH
4886.01	08/27/2012	09/21/2012	A		450.00	0.50	225.00	ARCH
4886.01	08/27/2012	09/21/2012	A		300.00	0.30	90.00	ARCH
							Preparing the discovery motion where the Judge ordered the Stipulation to Extend Discovery.	
4886.01	09/04/2012	09/21/2012	A		300.00	5.70	1,710.00	ARCH
							Reviewing documents from Coyote Springs. Preparation for deposition.	
4886.01	09/04/2012	09/21/2012	A		450.00	1.00	450.00	ARCH
4886.01	09/07/2012	09/21/2012	A		300.00	1.00	300.00	ARCH
							Review the privilege logs from Coyote Springs Meeting with James J. Jimmerson, Esq. regarding	
4886.01	09/12/2012	09/21/2012	A		300.00	5.60	1,680.00	ARCH
							Reviewing Coyote Springs documents produced by Pisanelli Bice.	
4886.01	09/14/2012	09/21/2012	A		450.00	0.50	225.00	ARCH
							Review Coyote Springs Documents with James M. Jimmerson, Esq.	
4886.01	09/18/2012	09/21/2012	A		300.00	4.60	1,380.00	ARCH
4886.01	09/19/2012	09/21/2012	A		450.00	1.50	675.00	ARCH
							Review of the Coyote Springs documents Meeting with James M. Jimmerson, Esq. regarding	
4886.01	09/19/2012	09/21/2012	A		450.00	2.00	900.00	ARCH
							Meeting with Jim Wolfram regarding	
4886.01	09/19/2012	09/21/2012	A		450.00	2.50	1,125.00	ARCH
							Review documents to	
4886.01	09/19/2012	09/21/2012	A		450.00	0.40	180.00	ARCH
4886.01	09/19/2012	09/21/2012	A		300.00	2.80	840.00	ARCH
							Conference with James J. Jimmerson, Esq. Meeting with Lynn M. Hansen, Esq. and J. Wolfram for	
4886.01	09/20/2012	09/21/2012	A		450.00	1.00	450.00	ARCH
							Conference with James M. Jimmerson, Esq. regarding	
4886.01	09/20/2012	09/21/2012	A		300.00	2.40	720.00	ARCH
							Preparation for deposition and review of documents regarding	
4886.01	09/21/2012	mm/dd/yyyy	P		450.00	1.00	450.00	388
4886.01	09/24/2012	mm/dd/yyyy	P		450.00	0.50	225.00	389
							Review documents produced Meeting with James M. Jimmerson, Esq. to discuss	

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Client	Trans Date	Stmt Date	H	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	09/24/2012	mm/dd/yyyy	P	450.00	5.00	2,250.00 Prepare for deposition of Jon Lash - Review	390
4886.01	09/24/2012	mm/dd/yyyy	P	450.00	2.00	900.00 Meeting with James M. Jimmerson, Esq. to discuss	391
4886.01	09/24/2012	mm/dd/yyyy	P	300.00	5.20	1,560.00 Preparation in anticipation of deposition of John Lash; meeting with client and Lynn M. Hansen, Esq. regarding	393
4886.01	09/24/2012	mm/dd/yyyy	P	550.00	1.50	825.00 Telephone conference with client to	405
4886.01	09/25/2012	mm/dd/yyyy	P	300.00	3.80	1,140.00 Deposition preparation for the deposition of John Lash.	394
4886.01	09/25/2012	mm/dd/yyyy	P	450.00	1.00	450.00 Review Stewart Title records regarding	396
4886.01	09/25/2012	mm/dd/yyyy	P	450.00	5.00	2,250.00 Review prepare	397
4886.01	09/26/2012	mm/dd/yyyy	P	300.00	6.10	1,830.00 Deposition of John Lash, before and after deposition.	395
4886.01	09/26/2012	mm/dd/yyyy	P	450.00	2.00	900.00 Review	398
4886.01	09/26/2012	mm/dd/yyyy	P	450.00	1.25	562.50 Take deposition of Jon Lash: Set up meeting	399
4886.01	09/26/2012	mm/dd/yyyy	P	550.00	2.00	0.00 Attended deposition of Jon Lash with Jim Wollfram, Lynn M. Hansen, Esq. and James M. Jimmerson, Esq. (NO CHARGE)	406
4886.01	09/27/2012	mm/dd/yyyy	P	450.00	0.50	225.00 Review	400
4886.01	09/27/2012	mm/dd/yyyy	P	450.00	0.20	90.00 Review trial setting	401
4886.01	10/01/2012	mm/dd/yyyy	P	300.00	0.50	150.00 Drafting of, and	402
4886.01	10/01/2012	mm/dd/yyyy	P	550.00	1.20	660.00 Prepare for tomorrow's	414
4886.01	10/02/2012	mm/dd/yyyy	P	300.00	0.60	180.00 Drafting	403
4886.01	10/02/2012	mm/dd/yyyy	P	300.00	0.60	180.00 with Lynn M. Hansen, Esq. and Pat	404
4886.01	10/02/2012	mm/dd/yyyy	P	450.00	1.00	Lundvall ith Pardee counsel: Conference with James J. Jimmerson, Esq. and review of	411
4886.01	10/02/2012	mm/dd/yyyy	P	450.00	0.50	225.00 Conference with James J. Jimmerson, Esq.	412
4886.01	10/02/2012	mm/dd/yyyy	P	450.00	0.25	112.50 Phone call with Harvey Whitmire.	413
4886.01	10/03/2012	mm/dd/yyyy	P	550.00	0.40	0.00 Conference with Lynn M. Hansen, Esq. and Shawn M. Goldstein, Esq. regarding, and	415
4886.01	10/03/2012	mm/dd/yyyy	P	550.00	0.40	220.00 Conference with Lynn M. Hansen, Esq. and James M. Jimmerson, Esq. regarding t: James J. Jimmerson, Esq.	416

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Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client ID	Client	Trans Date	Stmt Date	H P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM								
4886.01		10/03/2012	mm/dd/yyyy	P	450.00	0.50	270.00 Telephone conference with clients	420
4886.01		10/04/2012	mm/dd/yyyy	P	300.00	0.30	90.00 Telephone conference with client	407
4886.01		10/04/2012	mm/dd/yyyy	P	300.00	2.00	600.00 Review of	408
4886.01		10/04/2012	mm/dd/yyyy	P	300.00	2.30	690.00 Settlement conference call	409
4886.01		10/04/2012	mm/dd/yyyy	P	300.00	0.70	210.00 Meeting with S. Goldstein regarding	410
4886.01		10/04/2012	mm/dd/yyyy	P	375.00	1.00	375.00 Conference with James M. Jimmerson, Esq. regarding	417
4886.01		10/05/2012	mm/dd/yyyy	P	375.00	0.50	187.50 Reviewed and revised Notice of Deposition, Prepared, reviewed and revised letter to Opposing Counsel enclosing Notice of Deposition and Subpoena.	418
4886.01		10/05/2012	mm/dd/yyyy	P	450.00	0.75	337.50 Review James M. Jimmerson, Esq. and James J. Jimmerson, Esq.	423
4886.01		10/05/2012	mm/dd/yyyy	P	300.00	1.70	510.00 Drafting memorandum regarding	424
4886.01		10/05/2012	mm/dd/yyyy	P	300.00	0.50	150.00 Issuing subpoena and notice of deposition of Harvey Whittemore	425
4886.01		10/07/2012	mm/dd/yyyy	P	300.00	0.40	120.00 Meeting with JJJ regarding tent	426
4886.01		10/08/2012	mm/dd/yyyy	P	450.00	0.50	225.00 Meeting with James M. Jimmerson, Esq.	421
4886.01		10/08/2012	mm/dd/yyyy	P	450.00	0.50	225.00 Phone call with client	422
4886.01		10/08/2012	mm/dd/yyyy	P	300.00	0.10	30.00 Securing the Certificate of the Custodian of Records from Chicago Title	427
4886.01		10/08/2012	mm/dd/yyyy	P	300.00	0.50	150.00 Call with client regarding	428
4886.01		10/08/2012	mm/dd/yyyy	P	300.00	3.60	1,080.00 Records Office acquiring maps	429
4886.01		10/08/2012	mm/dd/yyyy	P	300.00	0.20	60.00 Meeting with Lynn M. Hansen, Esq. and James J. Jimmerson, Esq. regarding	430
4886.01		10/08/2012	mm/dd/yyyy	P	300.00	1.60	480.00 Review documents from Chicago Title specifically looking at	431
4886.01		10/09/2012	mm/dd/yyyy	P	300.00	1.50	480.00 Email to client attaching certain explaining the c	432
4886.01		10/12/2012	mm/dd/yyyy	P	300.00	0.70	210.00 Telephone conference with client regarding	433

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Client	Trans Date	Stmt Date	H	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/WOLFRAM							
4886.01	10/12/2012	mm/dd/yyyy	P	300.00	0.30	90.00	434
4886.01	10/12/2012	mm/dd/yyyy	P	450.00	0.50	225.00	435
4886.01	10/16/2012	mm/dd/yyyy	P	450.00	1.50	675.00	436
4886.01	10/16/2012	mm/dd/yyyy	P	450.00	0.25	112.50	437
4886.01	10/16/2012	mm/dd/yyyy	P	450.00	0.25	112.50	438
4886.01	10/16/2012	mm/dd/yyyy	P	300.00	0.80	240.00	441
4886.01	10/16/2012	mm/dd/yyyy	P	300.00	0.58	174.00	442
4886.01	10/16/2012	mm/dd/yyyy	P	300.00	0.50	150.00	443
4886.01	10/17/2012	mm/dd/yyyy	P	450.00	3.00	1,350.00	439
4886.01	10/17/2012	mm/dd/yyyy	P	140.00	3.00	420.00	448
4886.01	10/18/2012	mm/dd/yyyy	P	450.00	0.30	135.00	440
4886.01	10/18/2012	mm/dd/yyyy	P	300.00	4.90	1,470.00	444
4886.01	10/18/2012	mm/dd/yyyy	P	300.00	1.30	390.00	445
4886.01	10/18/2012	mm/dd/yyyy	P	450.00	0.75	337.50	449
4886.01	10/19/2012	mm/dd/yyyy	P	300.00	1.50	450.00	446
4886.01	10/19/2012	mm/dd/yyyy	P	300.00	3.50	1,050.00	447
4886.01	10/19/2012	mm/dd/yyyy	P	450.00	3.50	1,575.00	450
4886.01	10/19/2012	mm/dd/yyyy	P	450.00	1.50	675.00	451
4886.01	10/19/2012	mm/dd/yyyy	P	450.00	3.00	1,350.00	452
Total for Client ID 4886.01				Billable	Non-billable		
				317.93	10.40		
				Total	328.33		
WILKES/WOLFRAM				Billable	Non-billable		
				102,761.50	600.00		
				Total	103,361.50		

GRAND TOTALS

Billable	317.93	102,761.50
Non-billable	10.40	600.00
Total	328.33	103,361.50

Thursday 10/25/2012 4:11 pm

JA008827

PLTF10481

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client ID	Client	Trans Date	Stmnt Date	H P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFGRAM								
4886.01	WILKES/ WOLFGRAM	10/24/2012	11/21/2012	A	450.00	0.25	112.50	ARCH
4886.01		10/25/2012	11/21/2012	A	300.00	1.00	300.00	ARCH
4886.01		10/25/2012	11/21/2012	A	300.00	3.50	1,050.00	ARCH
4886.01		10/26/2012	11/21/2012	A	450.00	2.00	900.00	ARCH
4886.01		10/26/2012	11/21/2012	A	300.00	2.50	750.00	ARCH
4886.01		10/29/2012	11/21/2012	A	450.00	0.75	337.50	ARCH
4886.01		10/29/2012	11/21/2012	A	300.00	0.80	240.00	ARCH
4886.01		10/29/2012	11/21/2012	A	300.00	0.30	90.00	ARCH
4886.01		11/01/2012	11/21/2012	A	300.00	2.00	600.00	ARCH
4886.01		11/02/2012	11/21/2012	A	300.00	1.20	360.00	ARCH
4886.01		11/03/2012	11/21/2012	A	300.00	1.50	450.00	ARCH
4886.01		11/05/2012	11/21/2012	A	300.00	0.60	180.00	ARCH
4886.01		11/06/2012	11/21/2012	A	300.00	2.00	600.00	ARCH
4886.01		11/08/2012	11/21/2012	A	450.00	1.50	675.00	ARCH
4886.01		11/08/2012	11/21/2012	A	300.00	0.20	60.00	ARCH
4886.01		11/08/2012	11/21/2012	A	300.00	1.50	450.00	ARCH
4886.01		11/08/2012	11/21/2012	A	300.00	0.50	150.00	ARCH
4886.01		11/08/2012	11/21/2012	A	300.00	0.50	150.00	ARCH
4886.01		11/08/2012	11/21/2012	A	300.00	0.50	150.00	ARCH
4886.01		11/09/2012	11/21/2012	A	300.00	0.50	150.00	ARCH
4886.01		11/13/2012	11/21/2012	A	300.00	0.20	60.00	ARCH
4886.01		11/13/2012	11/21/2012	A	300.00	0.20	60.00	ARCH
4886.01		11/14/2012	11/21/2012	A	450.00	0.25	112.50	ARCH
4886.01		11/16/2012	11/21/2012	A	300.00	1.00	300.00	ARCH
4886.01		11/16/2012	11/21/2012	A	300.00	1.50	450.00	ARCH

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Smt H Date P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	11/19/2012	11/21/2012 A	140.00	3.00	420.00	ARCH
4886.01	11/29/2012	12/21/2012 A	300.00	0.30	90.00	ARCH
4886.01	11/30/2012	12/21/2012 A	450.00	0.50	225.00	ARCH
4886.01	11/30/2012	12/21/2012 A	450.00	0.30	135.00	ARCH
4886.01	11/30/2012	12/21/2012 A	450.00	0.30	135.00	ARCH
4886.01	12/03/2012	12/21/2012 A	300.00	0.50	150.00	ARCH
4886.01	12/05/2012	12/21/2012 A	450.00	0.30	135.00	ARCH
4886.01	12/05/2012	12/21/2012 A	300.00	0.10	30.00	ARCH
4886.01	12/06/2012	12/21/2012 A	550.00	1.00	550.00	ARCH
4886.01	12/17/2012	12/21/2012 A		1.20	0.00	ARCH
4886.01	12/17/2012	12/21/2012 A	300.00	1.00	300.00	ARCH
4886.01	12/17/2012	12/21/2012 A	300.00	2.50	750.00	ARCH
4886.01	12/17/2012	12/21/2012 A	300.00	0.10	30.00	ARCH
4886.01	12/18/2012	12/21/2012 A	450.00	0.50	225.00	ARCH
4886.01	12/19/2012	12/21/2012 A	300.00	0.50	150.00	ARCH
4886.01	12/20/2012	12/21/2012 A	300.00	1.50	450.00	ARCH
4886.01	12/20/2012	12/21/2012 A	550.00		-30,686.52	ARCH
4886.01	12/27/2012	01/21/2013 A	300.00	0.50	150.00	ARCH
4886.01	12/28/2012	01/21/2013 A	450.00	0.25	112.50	ARCH
4886.01	12/31/2012	01/21/2013 A	450.00	0.20	90.00	ARCH
4886.01	01/09/2013	01/21/2013 A	450.00	1.60	720.00	ARCH
4886.01	01/14/2013	01/21/2013 A	300.00	0.30	90.00	ARCH

PLTF10498

JA008829

Wednesday 03/13/2013 1:16 pm

Date: 03/13/2013

Page: 3

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmt Date	H Date	P Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM								
4886.01	01/17/2013	01/21/2013	A		300.00	4.40	1,320.00	ARCH
4886.01	01/18/2013	01/21/2013	A		300.00	0.10	30.00	ARCH
4886.01	01/21/2013	02/21/2013	A		300.00	1.50	450.00	ARCH
4886.01	01/21/2013	02/21/2013	A		550.00	3.00	1,650.00	ARCH
4886.01	01/22/2013	02/21/2013	A		300.00	0.50	150.00	ARCH
4886.01	01/22/2013	02/21/2013	A		300.00	1.50	450.00	ARCH
4886.01	01/23/2013	02/21/2013	A		550.00	1.50	825.00	ARCH
4886.01	01/23/2013	02/21/2013	A		300.00	0.50	150.00	ARCH
4886.01	01/23/2013	02/21/2013	A		300.00	0.50	150.00	ARCH
4886.01	01/27/2013	02/21/2013	A		550.00	2.00	1,100.00	ARCH
4886.01	01/28/2013	02/21/2013	A		450.00	0.25	112.50	ARCH
4886.01	02/14/2013	02/21/2013	A		450.00	1.00	450.00	ARCH
4886.01	02/20/2013	02/21/2013	A		550.00		-4,000.00	ARCH
Total for Client ID 4886.01					Billable	59.95	-14,174.02	
GRAND TOTALS							-14,174.02	
							Billable	
							59.95	

WILKES/ WOLFRAM
VS. PARDEE HOMES OF NEVADA

PLTF10499

Wednesday 03/13/2013 1:16 pm

JA008830

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Client	Trans Date	Stmnt Date	H Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM							
4886.01	02/21/2013	03/21/2013	A	450.00	1.00	450.00	ARCH
4886.01	02/26/2013	03/21/2013	A	450.00	0.25	112.50	ARCH
						Review Pleadings for Court	
						Review Motion to Enforce Order Shortening Time and Summary Judgment	
4886.01	02/26/2013	03/21/2013	A	300.00	1.00	300.00	ARCH
4886.01	02/27/2013	03/21/2013	A	300.00	0.50	150.00	ARCH
4886.01	02/28/2013	03/21/2013	A	300.00	8.10	2,430.00	ARCH
						Review of Motion to Continue Trial.	
						Prepare Plaintiff's 7th Supplement to 16.1 Disclosures.	
						Prepare Opposition to Motion to Continue (735); telephone call with opposing counsel regarding Motion to Continue and Motions in Limine (8).	
4886.01	03/01/2013	03/21/2013	A	450.00	0.25	112.50	ARCH
						Revise Opposition to Defendant's Motion to Enforce Order Shortening Time	
4886.01	03/01/2013	03/21/2013	A	300.00	0.80	240.00	ARCH
						Telephone conference with opposing counsel regarding Motion to Continue and Motions in Limine.	
4886.01	03/04/2013	03/21/2013	A	450.00	1.50	675.00	ARCH
4886.01	03/04/2013	03/21/2013	A	450.00	0.50	225.00	ARCH
						Review the Agreement for Hearing.	
						Meeting with James J. Jimmerson, Esq. and James M. Jimmerson, Esq. regarding	
4886.01	03/04/2013	03/21/2013	A	300.00	5.00	1,500.00	ARCH
						Prepare Memo in preparation with James J. Jimmerson, Esq. (1.0); Prep with James J. Jimmerson, Esq. on Motion for Summary Judgment Hearing (1.5); Research on (1.7) and Memo on standards on	
4886.01	03/05/2013	03/21/2013	A	450.00	3.50	1,575.00	ARCH
4886.01	03/05/2013	03/21/2013	A	450.00	0.30	135.00	ARCH
						Attend Hearing on Motion for Summary Judgment	
						Provide dates and tasks for calendaring pre-trial activities to assistant.	
4886.01	03/05/2013	03/21/2013	A	300.00	5.30	1,590.00	ARCH
						Attend Hearing on Motion for Summary Judgment (3.0); Meeting with client regarding Hearing on Motion for Summary Judgment (5); Meeting with James J. Jimmerson, Esq. regarding (1.0) and meeting with James J. Jimmerson, Esq. in	
						(8).	
4886.01	03/05/2013	03/21/2013	A	550.00	5.00	2,750.00	ARCH
						Prepared for and attended court hearing with Jim Wolfram in Pardee's Motion for Summary Judgment and our cross-motion for summary judgment; matter taken under advisement, but our cross-motion for summary judgment is granted; teleconference with Wilkes; trial dates set.	
4886.01	03/06/2013	03/21/2013	A	300.00	0.50	150.00	ARCH
						Telephone conference with client regarding	
4886.01	03/07/2013	03/21/2013	A	450.00	1.25	562.50	ARCH
4886.01	03/08/2013	03/21/2013	A	300.00	2.70	810.00	ARCH
						Review	
						Prepare Order regarding Partial Summary Judgment (1.4); Email with James J. Jimmerson, Esq. regarding (1.0).	
4886.01	03/11/2013	03/21/2013	A	450.00	0.25	112.50	ARCH
						Conference with James M. Jimmerson, Esq. regarding (3); Research regarding	

PLTF10506

JA008831

Date: 04/02/2013

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page: 2

Client	Trans Date	Stmt H Date P	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	03/11/2013	03/21/2013 A	300.00	0.20	60.00	ARCH
					Telephone conference with client regarding	
4886.01	03/12/2013	03/21/2013 A	300.00	2.60	780.00	ARCH
					Telephone conference with client (2); Legal research in (2.4).	
4886.01	03/13/2013	03/21/2013 A	300.00	3.20	960.00	ARCH
					Legal research regarding (1.5); drafting Order regarding Motion for Summary Judgment (.5); call with clients regarding (1.2).	
4886.01	03/14/2013	03/21/2013 A	300.00	3.20	960.00	ARCH
					Legal research in (1.2); drafting order denying summary judgment (.5); drafting motion for leave to amend (1.5).	
4886.01	03/15/2013	03/21/2013 A	300.00	6.40	1,920.00	ARCH
					Review opposition to Motions in Limine (2); drafting opposition to Motion in Limine on parole evidence (4.2); legal research (1.5); call with opposing counsel regarding orders and Motions in Limine (.5).	
4886.01	03/18/2013	03/21/2013 A	300.00	10.40	3,120.00	ARCH
					Drafting opposition to motion in limine regarding attorney's fees (8.4); legal research (2.0); call with client regarding	
4886.01	03/19/2013	03/21/2013 A	300.00	8.00	2,400.00	ARCH
					Revise order denying Motion for Summary Judgment (.2); Draft Opposition to Motion in Limine for compensation of time (6.8); call with client regarding (.5) and 8TH JUDICIAL DISTRICT COURT CLERK supplement (.5).	
4886.01	03/19/2013	03/21/2013 A	450.00	1.25	562.50	ARCH
					Review Objections to Motion in Limine	
4886.01	03/20/2013	03/21/2013 A	300.00	8.20	2,460.00	ARCH
					Prepare Opposition to Motion in Limine regarding disclosure after discovery deadline.	
4886.01	03/20/2013	03/21/2013 A	550.00	2.00	1,100.00	ARCH
					Pardee's Motion for Summary Judgment denied; Minutes received; Telephone conference with J. Wolfram and W. Wilkes;	
Total for Client ID 4886.01			Billable	83.15	28,202.50	WILKES/ WOLFRAM VS. PARDEE HOMES OF NEVADA

GRAND TOTALS

Billable 83.15 28,202.50

PLTF10507

Tuesday 04/02/2013 11:03 am

JA008832

Date: 05/21/2013

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page: 1

Client	Trans Date	Stmt H Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01	WILKES/ WOLFRAM					
4886.01	03/21/2013	03/21/2013 A	300.00	0.40	120.00	ARCH
4886.01	03/21/2013	03/21/2013 A	300.00	0.40	120.00	ARCH
4886.01	03/21/2013	04/21/2013 A	300.00	4.20	1,260.00	ARCH
					Redact billing statement	
					Review Motion for Leave to File Second Amended Complaint.	
					Prepare and draft Motion to Leave to File 2nd Amended Complaint, e-filed, emailed and mailed to opposing counsel.	
4886.01	03/22/2013	03/21/2013 A	450.00	0.60	270.00	ARCH
					Review Reply Brief	
4886.01	03/22/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					Prepared and filed Notice of Hearing on Motion.	
4886.01	03/25/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					Prepare e-mail to opposing counsel regarding: settlement.	
4886.01	03/26/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					Prepare e-mail for opposing counsel regarding: EDCR 2.67 conference.	
4886.01	03/29/2013	04/21/2013 A	300.00	1.50	450.00	ARCH
					Prepare email to opposing counsel regarding: motions in limine, EDCR 2.67 conference and phone call regarding the same.	
Total for Client ID 4886.01			Billable	7.80	2,430.00	WILKES/ WOLFRAM VS. PARDEE HOMES OF NEVADA

GRAND TOTALS

Billable 7.80 2,430.00

PLTF10508

Tuesday 05/21/2013 4:20 pm

JA008833

Date: 05/20/2013

Detail Fee Transaction File List JIMMERSON HANSEN, P.C.

Page: 1

Client	Trans Date	Stmt Date	Rate	Hours to Bill	Amount	Ref #
Client ID 4886.01 WILKES/ WOLFRAM						
4886.01	04/01/2013	04/21/2013 A	300.00	6.20	1,860.00	ARCH
					Trial preparation.	
4886.01	04/02/2013	04/21/2013 A	300.00	0.70	210.00	ARCH
					Review of letter from opposing counsel regarding: requesting advancing calendar call.	
4886.01	04/02/2013	04/21/2013 A	300.00	4.50	1,350.00	ARCH
					Draft of letter in response to letter from opposing counsel regarding: requesting advancing calendar call.	
4886.01	04/03/2013	04/21/2013 A	450.00	0.25	112.50	ARCH
					Conference with James M. Jimmerson, Esq. regarding	
4886.01	04/03/2013	04/21/2013 A	300.00	1.50	450.00	ARCH
					Drafting of Offer of Judgment	
4886.01	04/03/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					Review of	
4886.01	04/03/2013	04/21/2013 A	300.00	0.50	150.00	ARCH
					Prepare letter to counsel with opposing counsel regarding: teleconference.	
4886.01	04/03/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					Telephone call to Judge's chambers regarding: trial dates.	
4886.01	04/04/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					Telephone conference with Pat Lundvall regarding: setting of trial.	
4886.01	04/05/2013	04/21/2013 A	300.00	0.40	120.00	ARCH
					Call with P Lundvall re: trial setting	
4886.01	04/05/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					Conference with James J. Jimmerson, Esq. in advance of call with opposing counsel.	
4886.01	04/05/2013	04/21/2013 A	300.00	1.40	420.00	ARCH
					Legal research on	
4886.01	04/05/2013	04/21/2013 A	300.00	1.00	300.00	ARCH
					drafting subpoenas of trial	
4886.01	04/05/2013	04/21/2013 A	550.00	0.40	220.00	ARCH
					Telephone conference; Pardee wants to Bifurcate Trial; we do not agree.	
4886.01	04/08/2013	04/21/2013 A	450.00	0.40	180.00	ARCH
					Conference with James M. Jimmerson, Esq. and James J. Jimmerson, Esq. regarding	
4886.01	04/08/2013	04/21/2013 A	450.00	2.00	900.00	ARCH
					Review deposition of Jim Wolfram.	
4886.01	04/08/2013	04/21/2013 A	450.00	1.50	675.00	ARCH
					Meeting with client for	
4886.01	04/08/2013	04/21/2013 A	300.00	1.50	450.00	ARCH
					Meeting with client regarding:	
4886.01	04/08/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					email with opposing counsel re: trial date.	
4886.01	04/08/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					Telephone Conference with opposing counsel re: trial date and preserving Wilkes testimony	
4886.01	04/08/2013	04/21/2013 A	300.00	1.00	300.00	ARCH
					Drafting reply to motion for leave to amend to file 2nd amended complaint.	
4886.01	04/09/2013	04/21/2013 A	300.00	0.20	60.00	ARCH
					email w/opp; counsel re: trial date	
4886.01	04/09/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					correspondence w/ court on trial	
4886.01	04/10/2013	04/21/2013 A	450.00	0.50	225.00	ARCH
					Review Opposition to Plaintiff's Motion to file Amended Complaint.	
4886.01	04/12/2013	04/21/2013 A	300.00	0.30	90.00	ARCH
					Telephone conference with client regarding;	
4886.01	04/18/2013	04/21/2013 A	550.00	1.60	880.00	ARCH
					Review and revise Reply to Opposition and Amend Complaint	

PLTF10511

JA008834

Monday 05/20/2013 1:48 pm

EXHIBIT 14

EXHIBIT 14

JIMMERSON HANSEN, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
Telephone (702) 388-7171 - Facsimile (702) 387-1167

1 **SUPP**

2 JAMES J. JIMMERSON, ESQ.

3 Nevada Bar No. 000264

4 LYNN M. HANSEN, ESQ.

5 Nevada Bar No. 0244

6 JAMES M. JIMMERSON, ESQ.

7 Nevada Bar No. 12599

8 JIMMERSON HANSEN, P.C.

9 415 So. Sixth St., Ste. 100

10 Las Vegas, NV 89101

11 Tel No.: (702) 388-7171; Fax No.: (702) 380-6406

12 jjj@jimmersonhansen.com

13 lmh@jimmersonhansen.com

14 jmj@jimmersonhansen.com

15 Attorney for Plaintiffs

16 *James Wolfram and Walt Wilkes*

17 **DISTRICT COURT**

18 **CLARK COUNTY, NEVADA**

19 JAMES WOLFRAM AND WALT WILKES

20 Plaintiffs,

21 vs.

22 PARDEE HOMES OF NEVADA,

23 Defendant.

CASE NO.: A-10-632338-C

DEPT NO.: IV

24 **PLAINTIFFS' ELEVENTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF**
25 **WITNESSES AND DOCUMENTS**

26 COME NOW Plaintiffs, JAMES WOLFRAM and WALT WILKES, by and through their
27 attorneys, Lynn M. Hansen, Esq., and James M. Jimmerson, Esq., of the law firm of
28 Jimmerson Hansen, P.C., and hereby submit the following Eleventh Supplement to their list
of witnesses and production of documents, as follows (*new items in bold*):

///

///

///

I.

WITNESSES

Plaintiffs provide the following witnesses' identities, last known address and telephone numbers:

1. James Wolfram
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

2. Walt Wilkes
c/o Jimmerson Hansen, P.C.
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
(702) 388-7171

This person most knowledgeable is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

3. Frances Butler Dunlap
Chicago Title Company
Las Vegas, Nevada

This person was the head of the Real Estate Commercial Department of Chicago Title Company, is most knowledgeable, and is expected to render testimony regarding the facts and circumstances surrounding the subject matter of this litigation.

4. PARDEE HOMES OF NEVADA
Custodian of Records
McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
Reno, Nevada 89501
(775) 788-2000

Pardee Homes of Nevada is a named Defendant in this matter. Its present or former employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6) and/or custodians of records are expected to testify regarding the facts and background of this case.

- 1 5. PARDEE HOMES OF NEVADA
2 Person Most Knowledgeable
3 McDonald Carano Wilson LLP
4 100 West Liberty Street, 10th Floor
5 Reno, Nevada 89501
6 (775) 788-2000

7 Pardee Homes of Nevada is a named Defendant in this matter. Its present or former
8 employees, representatives, agents, person to be designated pursuant to NRCP 30(b)(6)
9 and/or Person Most Knowledgeable are expected to testify regarding the facts and background
10 of this case.

- 11 6. Jon Lash
12 c/o McDonald Carano Wilson LLP
13 100 West Liberty Street, 10th Floor
14 Reno, Nevada 89501
15 (775) 788-2000

16 Mr. Lash is an employee of PARDEE HOMES OF NEVADA and is expected to testify
17 regarding the facts and background of this case.

- 18 7. Clifford Anderson
19 c/o McDonald Carano Wilson LLP
20 100 West Liberty Street, 10th Floor
21 Reno, Nevada 89501
22 (775) 788-2000

23 Mr. Anderson is an employee of PARDEE HOMES OF NEVADA and is expected to
24 testify regarding the facts and background of this case.

- 25 8. Harvey Whitmore
26 c/o Coyote Springs
27 Address Unknown

28 Mr. Whitmore is the owner of the property involved in this lawsuit and is expected to
testify regarding the facts and background of this case.

9. Chicago Title Company
Las Vegas, Nevada
Custodian of Records

The Custodian of Records is expected to testify regarding the facts and background of
this case.

10. Chicago Title Company
Las Vegas, Nevada
Person Most Knowledgeable

1 The Person Most Knowledgeable is expected to testify regarding the facts and
2 background of this case.

3
4 11. Peter J. Dingerson
5 D&W Real Estate
6 5455 S. Durango Dr., Ste 160
7 Las Vegas, NV 89113

8 Mr. Dingerson is the owner of D&W Real Estate and is expected to testify regarding the
9 facts and background of this case.

10
11 12. Jay Dana
12 General Realty Group
13 6330 S. Eastern Ave Ste 2
14 Las Vegas, NV 89119

15 Mr. Dana is the owner of General Realty Group Inc. and is expected to testify regarding
16 the facts and background of this case.

17
18 13. Jerry Masini
19 Award Realty Corp.
20 3015 S. Jones Blvd.
21 Las Vegas, NV 89146

22 Mr. Masini is the owner of Award Realty and is expected to testify regarding the
23 facts and background of this case.

24
25 14. Mark Carmen
26 Exit Realty Number One
27 6600 W. Charleston, Suite #119
28 Las Vegas, Nevada 89146

Mr. Carmen is the owner of Las Vegas Realty Center and is expected to testify
regarding the facts and background of this case.

15. James J. Jimmerson, Esq.
C/O JIMMERSON HANSEN, PC
415 South Sixth Street #100
Las Vegas, Nevada 89101

Mr. Jimmerson is a principal of Jimmerson Hansen, P.C and is expected to
testify regarding Plaintiffs' attorney's fees and costs.

Plaintiffs reserve the right to call any and all witnesses who may be disclosed or
deposed throughout the course of discovery.

1 Plaintiffs reserve the right to call any and all of Defendant's witnesses; and
2 Plaintiffs reserve the right to call any and all rebuttal witnesses.
3 Plaintiffs' experts, if any, as yet unidentified.
4 Plaintiffs reserve the right to supplement this list of witnesses as discovery
5 progresses and until the time of trial in this case.

6 II.

7 DOCUMENTS

8 Pursuant to NRCP 16.1(a)(1)(B), Plaintiffs provide the following documents relating to
9 Plaintiffs and Defendants:

- 10 1. Any and all written agreements between the Parties;
11 2. Any and all documents evidencing damages to the Plaintiffs;
12 3. Any and all correspondence between the Parties;
13 4. Any and all appropriate Custodian of Record documents;
14 5. Any and all pleadings in this matter;

15 These documents are being reproduced as Plaintiffs' Initial NRCP 16.1 Disclosures of
16 Witnesses and Documents had duplicate documents. The duplicate copies have been
removed and the documents are listed as follows:

- 17 1. Option Agreement for the Purpose of Real Property and Joint Escrow
Instructions dated May 2004 (Bates No. PLTF0001-0080);
18 2. Amended and Restated Option Agreement for the Purchase of Real Property
and Joint Escrow Instructions dated March 28, 2005, (Bates No. PLTF0081-
19 0152);
20 3. Two Assignments of Real Estate Commission and Personal Certification
21 Agreement (Bates No. PLTF0153-0157A)
22 4. Letter dated September 2, 2004 from Pardee Homes to Mr. Walt Walkes
23 regarding the attached Commission letter dated September 1, 2004, (Bates No.
24 PLTF0158-0162);
25 5. Amendment No. 2 to Option Agreement for the Purchase of Real Property and
Joint Escrow Instructions, (Bates No. PLTF0163-0174);
26 6. Letter dated April 6, 2009 from Pardee Homes to Mr. Jim Wolfram, (Bates No.
27 PLTF0175-0179);
28 7. Letter dated April 23, 2009 from James J. Jimmerson, Esq., to Jim Stringer,
Esq., (Bates No. PLTF0180-0187);
8. Letter dated May 19, 2011 from James J. Jimmerson, Esq., to Jim Stringer,
Esq., (Bates No. PLTF0188-0191);

9. Letter dated July 10, 2009 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0192-0193);
10. Letter dated August 26, 2009 from James J. Jimmerson, Esq., to Charles E. Curtis, (Bates No. PLTF0194-0196);
11. Letter dated November 24, 2009 from Jon E. Lash to Mr. Jim Wolfram, (Bates No. PLTF0197-0202);
12. Letter dated April 21, 2010 from Jim Wolfram to Mr. Jon Lash, (Bates No. PLTF0203-0205);
13. Letter dated May 17, 2010 from James J. Jimmerson, Esq., to Mr. John E. Lash, (Bates No. PLTF0206-0209);
14. Letter dated June 14, 2010 from Charles E. Curtis to James J. Jimmerson, Esq., (Bates No. PLTF0210-0211);
15. Bates Nos. PLTF0212-0244 are the duplicative documents produced in Plaintiffs' Initial 16.1 Disclosure of Documents and Witnesses.
16. Documents produced by Stewart Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF0245-PLTF1423);
17. Documents produced by Chicago Title in response to Plaintiffs' Subpoena Duces Tecum on CD, (Bates No. PLTF1424-PLTF10414);
18. Documents produced by Coyote Springs Investments in response to Plaintiff's Duces Tecum on CD, (Bates No. CSI_Wolfram 000014 - CSI_Wolfram0003004), attached hereto;
19. Coyote Springs Investment, LLC's Privilege Log, (Bates No. PLTF10415 - PLTF10417), attached hereto;
20. Affidavit of Custodian of Records, (Bates No. PLTF10418-PLTF10419); attached hereto;
21. Non-Party Coyote Springs Investments, LLC's Supplement and Amended Objection and Response to Plaintiff's Subpoena Duces Tecum, (Bates PLTF10420-PLTF10424, attached hereto.
22. Chicago Title Company's previously bates stamped documents no. PLTF 1424 through PLTF 10414 (on bottom right of documents bates stamped) and rebated as bates nos: Cht 00001 through Cht 08998 (on bottom left of documents bates stamped), including the Custodian of Records Subpoena to Chicago Title Company including the executed Certificate of Custodian of Records bates stamped as Cht 08997.
23. Stewart Title Company's previously bates stamped documents no. PLTF 0245 through PLTF 1423 and rebated as bates nos: Stwt 0001 through 1202. Documents Stwt 0699 and Stwt 0731 are copy coversheets and were inadvertently bates stamped.
24. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 138, page 51, bates PLTF 10427 through PLTF 10438.
25. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 116,

- 1 page 35, bates PLTF 10439 through PLTF 10440.
- 2 26. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 117,
- 3 page 18, bates PLTF 10441 through PLTF 10443.
- 4 27. Copy of Plat Map recorded in the Clark County Recorder's Office in Book 140,
- 5 page 57, bates PLTF 10444 through PLTF 10456.
- 6 28. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 113,
- 7 page 55, bates PLTF 10457 through PLTF 10462.
- 8 29. Copy of Parcel Map recorded in the Clark County Recorder's Office in File 98,
- 9 page 57, bates PLTF 10463 through PLTF 10468.
- 10 30. Copy of redacted billing sheets representing attorney's fees charged by
- 11 Jimmerson Hansen, P.C. from November 3, 2010 through October 19, 2012,
- 12 bates PLTF 10469 through PLTF 10481.
- 13 31. Affidavit of Peter J. Dingerson, bates PLTF 10482 through PLTF 10484.
- 14 32. Assignment of Rights, Title and Interest from Jay Dana on behalf of General
- 15 Realty Group Inc. to Walt Wilkes, dated January 11, 2011, bates PLTF 10485.
- 16 33. Assignment of Rights, Title and Interest from Jerry Masini on behalf of Award
- 17 Realty to James Wolfram, dated December 20, 2010, bates PLTF 10486.
- 18 34. Letter from Jeffrey King, M.D. dated November 1, 2011 regarding the health of
- 19 Walt Wilkes, bates PLTF 10487.
- 20 35. Affidavit of Jerry Masini, bates PLTF 10488 through PLTF 10490.
- 21 36. Assignment signed by Mark Carmen dated December 3, 2012 along with Exhibit
- 22 A signed by Jay Dana dated January 11, 2011, attached hereto as bates PLTF
- 23 10491 through PLTF 10493; and
- 24 37. Assignment signed by Peter J. Dingerson dated December 20, 2012 along with
- 25 Exhibit A signed by Jerry Masini dated December 20, 2010, attached hereto as
- 26 bates PLTF 10494 through PLTF 10496.
- 27 38. Copy of redacted billing sheets representing attorney's fees charged by
- 28 Jimmerson Hansen, P.C. from October 24, 2012 through February 21, 2013,
- 29 bates PLTF 10497 through PLTF 10499.
- 30 39. Copy of redacted costs representing costs expended by Jimmerson Hansen,
- 31 P.C. from December 29, 2010 through February 4, 2013 bates PLTF 10500
- 32 through PLTF 10505.
- 33 40. Copy of redacted billing sheets representing attorney's fees charged by
- 34 Jimmerson Hansen, P.C. from February 21, 2013 through March 29, 2013,
- 35 bates PLTF 10506 through PLTF 10508.
- 36 41. Copy of redacted costs representing costs expended by Jimmerson Hansen,
- 37 P.C. from February 27, 2013 through March 13, 2013 bates PLTF 10509
- 38 through 10510.
- 39 42. Copy of redacted billing sheets representing attorney's fees charged by
- 40 Jimmerson Hansen, P.C. from April 1, 2013 through April 18, 2013, bates PLTF

10511 through PLTF 10512.

43. Color copy of the map as edited by James Wolfram, attached hereto as bates PLTF 10513.
44. Color copy the original map from Jon Lash to James Wolfram of the entire site, attached hereto as bates PLTF 10514.
45. Three (3) color copies of maps from James Wolfram to Jon Lash, originally produced by your office on April 21, 2010, attached hereto as bates PLTF 10515-10517; and
46. A further detailed computation of the attorney fee damages is found at Exhibit "1" attached hereto. Exhibit "1" is a collection of the previously produced attorney's fees with the highlighted sections representing the line items which were aggregated at 100% plus the non-highlighted line items which were aggregated at 33.3% to equal \$102,160.00. The pink highlighted line items represent those damages for a breach of contract and breach of the implied covenant of good faith and fair dealing claims, which total \$7,602.50.
47. **Emails dated from September 2008 between Nevada Title and Plaintiffs with their attachments (commercial sales and parcels designated for the upcoming BLM land action from Nevada Tile), attached hereto as bates PLTF 10518-10527**

Plaintiffs reserve the right to any and all documents the Defendants disclosed by any parties or used at any depositions.

Plaintiffs reserve the right to any and all other relevant documents to this matter.

Plaintiffs reserve the right to identify and produce different and/or additional documents as the investigation and discovery in this case proceeds.

III.

COMPUTATION OF DAMAGES

Plaintiffs calculate their damages to be in excess of \$1,900,000.00 associated with the Defendant's breach of contract and the Defendant's failure to faithfully meet their obligations to the Plaintiffs.

There are two primary components to this calculation. The first component is the loss of future commissions from future sales or takedowns of property located in Clark County, subject to the September 1, 2004 Commission Letter Agreement. There appears to be at least 3,000 acres of property, defined as Option Property under the Option Agreement effective June 1, 2004, currently owned by Coyote Springs Investment, LLC in Township 13 South, Range 63 East M.D.M., Clark County, Nevada. Under the Option Agreement effective June 1, 2004, these 3,000 acres can be purchased by Pardee and designated as Production

1 Residential Property—a purchase and designation that would entitle Plaintiffs to a 1.5%
2 commission on a per-acre price of \$40,000.00. If 3,000 acres were purchased by Pardee
3 under this scenario, Plaintiffs would be entitled to \$1,800,000 in commissions. However,
4 Pardee's course of conduct in failing to appropriately discharge its duties under the
5 Commission Letter Agreement has robbed Plaintiffs of this opportunity to be paid these
6 commissions. Pardee's actions have served to reclassify the land originally labeled as
7 Purchase Property and Option Property, and under the new reclassification, all Option
8 Property has been removed from Clark County, thereby divesting Plaintiffs of any hope to
9 collect any part of the \$1.8 million in commissions they could be paid had no reclassification
10 occurred.

11 The second component of this calculation is attorney's fees. Plaintiffs' attorney's fees
12 and costs currently exceed \$146,000.00. This amount represents all work from the date of
13 drafting of the Complaint in November 2010 through April 20, 2013. Plaintiffs' attorney's fees
14 and costs constitute damages pursuant to the September 1, 2004 Commission Letter
15 Agreement. As stated in the Agreement, "In the event, either party brings an action to enforce
16 its rights under this Agreement, the prevailing party shall be awarded reasonable attorneys'
17 fees and costs." Plaintiffs in bringing this suit expect to be the prevailing party and, as such,
18 are entitled to their reasonable attorney's fees as damages for Defendant's breach of contract,
19 breach of the covenant of good faith and fair dealing, and for compelling the accounting due
20 to Plaintiffs.

21 As stated by the Court in its most recent minute order, Plaintiffs' claims for attorney fee
22 damages are governed by *Sandy Valley Assoc. v. Sky Ranch Estates Owners Assoc.*, 117
23 Nev. 948 (2001). Pursuant to *Sandy Valley*, Plaintiffs calculate their attorney fee damages as
24 follows: all fees and costs incurred for filing the complaint, prosecuting the claim for
25 accounting, and seeking documents owed to Plaintiffs under the September 1, 2004
26 Commission Letter Agreement (for the breach of contract and breach of the covenant of good
27 faith and fair dealing claims) plus one-third of the fees and costs incurred for the prosecution
28 of all of the claims (as one of the three claims is for an accounting for which all of Plaintiffs'
fees are damages). Exempt from the damages are fees in connection with the prosecution


1 of the breach of contract and breach of the implied covenant of good faith and fair dealing
2 claims, specifically not in furtherance of the recovery of documents. To date, Plaintiffs'
3 attorney fee damages are greater than or equal to: **\$102,160.00**. Specifically, Plaintiffs'
4 attorney fee damages for the accounting claim equal or exceed **\$102,160.00**; for the claim for
5 the breach of contract equal or exceed **\$7,602.50**; and for the claim for the breach of the
6 implied covenant of good faith and fair dealing claims equal or exceed **\$7,602.50**.

7 Finally, Plaintiffs must be compensated for the time and effort expended attempting to
8 discover from public records what information was owed to them under the Commission Letter
9 Agreement. Specifically, Plaintiffs spent at least 80 hours in attempting to acquire this
10 information. At a fair hourly rate of \$80.00 per hour, Plaintiffs' damages equal or exceed
11 \$6,400.00 for their time.

12 Discovery is still ongoing therefore the Plaintiffs reserve the right to amend and
13 supplement this response as the investigation and discovery in this case proceeds.

14 Dated this 3rd day of June, 2013.

JIMMERSON HANSEN, P.C.


JAMES J. JIMMERSON, ESQ.
Nevada Bar No. 000264
LYNN M. HANSEN, ESQ.
Nevada Bar No. 0244
JAMES M. JIMMERSON, ESQ.
Nevada Bar No. 12599
415 So. Sixth St., Ste. 100
Las Vegas, NV 89101
Attorney for Plaintiffs
James Wolfram and Walt Wilkes

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of PLAINTIFFS' ELEVENTH SUPPLEMENT TO NRCP 16.1 DISCLOSURE OF WITNESSES AND DOCUMENTS was made on the 3rd day of June, 2013, as indicated below:

☒ By first class mail, postage prepaid from Las Vegas, Nevada pursuant to N.R.C.P. 5(b) addressed as follows below

By electronic service through the E-filing system

By facsimile, pursuant to EDCR 7.26

By receipt of copy as indicated below

PAT LUNDVALL, ESQ.,
AARON D. SHIPLEY, ESQ.
McDONALD CARANO WILSON, LLP
2300 W. Sahara Avenue, Suite 1000
Las Vegas, Nevada 89102
Attorneys for Defendant
Pardee Homes of Nevada


An Employee of JIMMERSON HANSEN, P.C.

FROM :

FAX NO. :

May. 20 2013 01:49PM P2
146 1 01 1

Subj: Pardee takes down another coyote springs property
Date: 9/24/2008 12:54:47 AM Pacific Daylight Time
From: [vlandman@earthlink.net]
To: Aewolf12@aol.com

Tues. @ 2:00

Jim, what do you think about this????

— Original Message —
From: Phil Zobrist
To: Walt Wilkes1
Sent: Tuesday, September 23, 2008 9:03 PM
Subject: FW: August sales and BLM auction

Walt I see Coyote Springs took down another Parcel 33mill!! Hope you got your commish!

**Phil Zobrist
Valley Property Management
702-451-6160 Office
702-496-0900 Cell
zobz1@cox.net**

From: Travis Nelson [mailto:tnelson@nevadatitle.com]
Sent: Tuesday, September 23, 2008 7:52 PM
To: Travis Nelson
Subject: August sales and BLM auction

Attached are the August commercial sales and the parcels designated for the upcoming BLM land auction, 9/29/08, courtesy of Nevada Title Company. If I can be of any further assistance do not hesitate to contact me.

Travis K. Nelson
Vice President Commercial Marketing
Nevada Title Company
2500 N. Buffalo Dr. Ste. 150
Las Vegas, NV 89128
Office: (702)-251-5000
Cell: (702)-598-9046
Facsimile: (702) 944-8181
tnelson@nevadatitle.com

No virus found in this incoming message.
Checked by AVG,
Version: 7.5.524 / Virus Database: 270.7.1/1686 - Release Date: 9/23/2008 7:38 AM

No virus found in this outgoing message.
Checked by AVG,
Version: 7.5.524 / Virus Database: 270.7.1/1686 - Release Date: 9/23/2008 7:38 AM

No virus found in this outgoing message.
Checked by AVG,
Version: 7.5.524 / Virus Database: 270.7.1/1686 - Release Date: 9/23/2008 7:38 AM

PLTF10518

JA008847

T135 KAGE 2008

ITAL COMMISSION MONDAY 10-10-10 - 10:00 AM 7:00

43075.81 PER ACRES

FROM :
Sep 24 08 12:07p
VVAIT WILKES
FAX NO. :
May. 20 2013 01:49PM P3
8056508145
p.1

Nevada Title Company

Commercial Deals - August, 2008

Seller	Buyer	Parcel	Lot Acres	Doc Date	Trans Amount	Zip Code
M R H DEVELOPMENT LLC	H B H H Dev Tra	162221000004	1.10	8/1/2008	\$159,000,000.00	89109
ROBBREY PLACE INVESTORS	L H R E C R O P Inc	161305000001	8.58	8/27/2008	\$19,911,998.30	89109
UNICO REALTY	Song Hatcher Commercial LVP	161213417002	0.00	8/15/2008	\$8,100,000.00	89101
R D S INC	Integrity Real	171810100008	0.00	8/1/2008	\$15,100,000.00	89114
C D R V VALL HENDERSON LLC	Bank America	160148160002 and		8/26/2008	\$8,000,000.00	89011
KOLBE CREDIT UNION	BENNETT FAMILY TRUST	170031100004	0.49	8/1/2008	\$1,250,000.00	89014
GALARDI CHILDREN'S RES TR	810 South Boulder Highway LLC	171900100004	1.10	8/27/2008	\$1,000,000.00	89015
SLADE DEVELOPMENT INC	Irma Vargas	138354010001	0.59	8/27/2008	\$1,200,000.00	89104
STOCK DEVELOPMENT #3 LLC	Merton & Nancy Grable	181710100009	6.31	8/21/2008	\$15,240,000.00	89102
UNICO REALTY	Senak LLC	140225110003	1.60	8/2/2008	\$8,400,000.00	89106
HORTON D INC	Sing Harbor Condominiums LVP	162134170001	0.00	8/15/2008	\$8,100,000.00	89121
HORTON D INC	A G L R E L U M D E M A R LLC	170310100008		8/22/2008	\$3,654,000.00	89131
F A E HOLDING TRUST LLC	A G L H H O L D I N G O W N E R LLC	191024191015 and		8/22/2008	\$9,521,000.00	89141
BURTONSON FAMILY TRUST	Bank Boyer	161412120027	1.75	8/1/2008	\$5,000,000.00	89129
MANEDORF ZEEV & CILA	Borotiel Group	171055100005	2.16	8/12/2008	\$4,000,000.00	89115
DEL TACO INC	1943 Trust Associated Family	161161100005	0.80	8/1/2008	\$1,600,000.00	89147
GALARDI CHILDREN'S RES TR	John Spauri	171410100014	2.54	8/22/2008	\$2,700,000.00	89123
SCHWAB THOMAS F	Widow's Partnership	151210140003	0.62	8/12/2008	\$1,854,731.00	89122
FIRST CLASS LLC	Irma Vargas	138354010001	0.24	8/27/2008	\$1,500,000.00	89104
WACHSAL DEVELOPMENT CORPORATION	Richard Crawford	144107010005	0.76	8/1/2008	\$2,850,000.00	89146
BLACK 39 LLC	Property Cont	138354010005	0.86	8/1/2008	\$2,850,000.00	89110
DANCO J B & LIVING TRUST	Boys & Beth Rep	138021400003	1.86	8/15/2008	\$2,807,403.00	89138
CELEBRATE INVESTMENT LLC	J and Q Boulder LLC	171140100001	4.80	8/25/2008	\$4,250,000.00	89103
FORD DURANGO LLC	Rogers 39 LLC	161210000005	2.34	8/1/2008	\$1,300,000.00	89103
CELEBRATE INVESTMENT LLC	Charles & Deborah Strommen	132121100003	4.68	8/1/2008	\$2,040,000.00	89115
CELEBRATE INVESTMENT LLC	Caplan Roy LLC	132201001002	4.58	8/1/2008	\$1,375,000.00	89149
CELEBRATE INVESTMENT LLC	Celebrate Invest	131041100001	31.81	8/18/2008	\$1,000,000.00	89002
CELEBRATE INVESTMENT LLC	Farmington LLC	170101010001	2.35	8/1/2008	\$1,200,000.00	89103
CELEBRATE INVESTMENT LLC	171010100005	171010100005	3.96	8/22/2008	\$2,853,468.00	89149
CELEBRATE INVESTMENT LLC	171010100005	171010100005	716.18	8/1/2008	\$31,434,584.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	2.37	8/1/2008	\$1,081,989.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	5.00	8/1/2008	\$6,394,200.00	89113
CELEBRATE INVESTMENT LLC	171010100005	171010100005	1.48	8/1/2008	\$1,710,000.00	89113
CELEBRATE INVESTMENT LLC	171010100005	171010100005	4.18	8/15/2008	\$2,370,000.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	0.23	8/1/2008	\$2,356,500.00	89135
CELEBRATE INVESTMENT LLC	171010100005	171010100005	5.00	8/22/2008	\$1,500,000.00	89101
CELEBRATE INVESTMENT LLC	171010100005	171010100005	3.14	8/22/2008	\$1,266,000.00	89101
CELEBRATE INVESTMENT LLC	171010100005	171010100005	28.63	8/22/2008	\$1,004,000.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	19.17	8/22/2008	\$1,000,000.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	0.63	8/22/2008	\$1,500,000.00	89002
CELEBRATE INVESTMENT LLC	171010100005	171010100005	5.40	8/22/2008	\$1,500,000.00	89104
CELEBRATE INVESTMENT LLC	171010100005	171010100005	40.00	8/22/2008	\$1,500,000.00	89126
CELEBRATE INVESTMENT LLC	171010100005	171010100005	40.00	8/22/2008	\$1,500,000.00	89126
CELEBRATE INVESTMENT LLC	171010100005	171010100005	40.00	8/22/2008	\$1,500,000.00	89126


This information has been furnished for the purpose of providing information to the public and is not to be used for any other purpose. The information is not to be used for any other purpose. The information is not to be used for any other purpose.

Courtesy of Travis Nelson, Nevada Title Company - (702)

Statistics/Reports Maps Record Searches Search Forms

M.W. Schofield, Assessor

REAL PROPERTY PARCEL RECORD

 [Click Here for a Print Friendly Version](#)

Assessor Map Aerial View Building Sketch Ownership History

GENERAL INFORMATION	
PARCEL NO.	009-09-110-001
OWNER AND MAILING ADDRESS	PARDEE HOMES NEVADA %J LASH 10880 WILSHIRE BLVD #1900 LOS ANGELES CA 90024-4101
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	UNINCORP. COUNTY
ASSESSOR DESCRIPTION	COYOTE SPRINGS VILLAGES 2,3,4,7 8,9,10 & 11 PLAT BOOK 138 PAGE 51 LOT LP-3 SEC 09 TWP 13 RNG 63
RECORDED DOCUMENT NO.	* 20080808:02102
RECORDED DATE	08/08/2008
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	146
APPRAISAL YEAR	2008
FISCAL YEAR	08-09
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2007-08	2008-09
LAND	0	345590
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED	0	345590

PLTF10520

JA008849

197.48 acres

FROM :
Clark County Real Property

FAX NO. :

May. 20 2013 01:51PM P5

Page 2 of 2

TAXABLE VALUE LAND+IMP


0

987400

[Click here for Treasurer Information regarding real property taxes.](#)

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	197.48 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	33434594 08/08
LAND USE	0-00 VACANT
DWELLING UNITS	0

NO RESIDENTIAL APPRAISAL RECORD FOR THIS PARCEL

ASSESSORMAP VIEWING GUIDELINES	
MAP	009091
	<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p> 

NOTE: THIS RECORD IS FOR ASSESSMENT USE ONLY. NO LIABILITY IS ASSUMED
AS TO THE ACCURACY OF THE DATA DELINEATED HEREON.



Government Center, 500 South Grand Central Parkway, Las Vegas, Nevada 89155-1401

702-455-3882 (INFORMATION)



PLTF10521

JA008850

FROM :

FAX NO. :

May. 20 2013 01:51PM P6

Page 1 of 2


Clark County Real Property

Statistics/Reports Maps Record Searches Searched Forms

M.W. Schofield, Assessor

182.81 acres

REAL PROPERTY PARCEL RECORD

 [Click Here for a Print Friendly Version](#)

Assessor Map Aerial View Building Sketch Ownership History

GENERAL INFORMATION	
PARCEL NO.	009-08-810-001
OWNER AND MAILING ADDRESS	PARDEE HOMES NEVADA %J LASH 10880 WILSHIRE BLVD #1900 LOS ANGELES CA 90024-4101
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	UNINCORP. COUNTY
ASSESSOR DESCRIPTION	COYOTE SPRINGS VILLAGES 2,3,4,7 8,9,10 & 11 PLAT BOOK 138 PAGE 51 LOT LP-1 SEC 08 TWP 13 RNG 63
RECORDED DOCUMENT NO.	* 20080808:02102
RECORDED DATE	08/08/2008
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	146
APPRAISAL YEAR	2008
FISCAL YEAR	08-09
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2007-08	2008-09
LAND	0	1919505
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED	0	1919505

PLTF10522

JA008851

FROM :

FAX NO. :

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Clark County Real Property


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TAXABLE VALUE LAND+IMP	0	5484300
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ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	182.81 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	33434584 08/08
LAND USE	0-00 VACANT
DWELLING UNITS	0

NO RESIDENTIAL APPRAISAL RECORD FOR THIS PARCEL

ASSESSORMAP VIEWING GUIDELINES	
MAP	009088
<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p> <p></p>	

NOTE: THIS RECORD IS FOR ASSESSMENT USE ONLY. NO LIABILITY IS ASSUMED AS TO THE ACCURACY OF THE DATA DELINEATED HEREON.



Government Center, 500 South Grand Central Parkway, Las Vegas, Nevada 89155-1401

702-455-3882 (INFORMATION)



PLTF10523

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Clark County Real Property

[Statistics/Reports](#)
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[Forms](#)

M.W. Schofield, Assessor

197.48

182.81

395.87

776.16 plus additional
91 acres on 1/4/8

REAL PROPERTY PARCEL RECORD ± 776.16 acres \$33,434,584

 [Click Here for a Print Friendly Version](#)

8/8/08 Approx \$44 per

[Assessor Map](#)
[Aerial View](#)
[Building Sketch](#)
[Ownership History](#)

GENERAL INFORMATION	
PARCEL NO.	009-09-501-001
OWNER AND MAILING ADDRESS	PARDEE HOMES NEVADA %J LASH 10880 WILSHIRE BLVD #1900 LOS ANGELES CA 90024-4101
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	UNINCORP. COUNTY
ASSESSOR DESCRIPTION	PARCEL MAP FILE 113 PAGE 55 LOT 2 SEC 09 TWP 13 RNG 63
RECORDED DOCUMENT NO.	* 20080808:02102
RECORDED DATE	08/08/2008
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	146
APPRAISAL YEAR	2008
FISCAL YEAR	08-09
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2007-08	2008-09
LAND	0	4156635
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED	0	4156635

FROM :
Clark County Real Property

FAX NO. :


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TAXABLE VALUE LAND+IMP	0	11876100
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ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	395.87 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	33434584 08/08
LAND USE	0.00 VACANT
DWELLING UNITS	0

NO RESIDENTIAL APPRAISAL RECORD FOR THIS PARCEL

ASSESSORMAP VIEWING GUIDELINES	
MAP	009095
<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p> 	

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702-455-3882 (INFORMATION)



PLTF10525


JA008854

Statistics/Reports Maps Record Searches Search Forms

M.W. Schofield, Assessor

REAL PROPERTY PARCEL RECORD

291 acres \$11 million

 [Click Here for a Print Friendly Version](#)

1/4/08 Approx \$121 per

Assessor Map Aerial View Building Sketch Ownership History

GENERAL INFORMATION	
PARCEL NO.	009-16-601-001
OWNER AND MAILING ADDRESS	PARDEE HOMES NEVADA %J LASH 10880 WILSHIRE BLVD #1900 LOS ANGELES CA 90024-4101
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	UNINCORP. COUNTY
ASSESSOR DESCRIPTION	PARCEL MAP FILE 113 PAGE 99 LOT 3 SEC 16 TWP 13 RNG 63
RECORDED DOCUMENT NO.	* 20080104-01110
RECORDED DATE	01/04/2008
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	146
APPRAISAL YEAR	2008
FISCAL YEAR	08-09
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2007-08	2008-09
LAND	0	955500
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED	0	955500

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Clark County Real Property

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TAXABLE VALUE LAND+IMP


0

2730000

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ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	91.00 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	11000000 01/08
LAND USE	0-00 VACANT
DWELLING UNITS	0

NO RESIDENTIAL APPRAISAL RECORD FOR THIS PARCEL

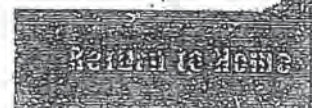
ASSESSORMAP VIEWING GUIDELINES	
MAP	009166
	<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p> 

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PLTF10527

JA008856