

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

ELEANOR AHERN,

Appellant,

vs.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP,

Respondent.

Electronically Filed
Supreme Court No.: 72897
June 26 2018 08:25 a.m.
Elizabeth A. Brown
Clerk of Supreme Court
District Court Case No.:
P-09-066425-T

Appeal from the Eighth Judicial
District Court, The Honorable Gloria
Sturman Presiding

RESPONDENT'S SUPPLEMENTAL APPENDIX

BROWNSTEIN HYATT FARBER SCHRECK, LLP

Kirk B. Lenhard, Esq., NV Bar No. 1437

klenhard@bhfs.com

100 North City Parkway, Suite 1600

Las Vegas, NV 89106-4614

Telephone: 702.382.2101

Facsimile: 702.382.8135

*Attorneys for Respondent
Brownstein Hyatt Farber Schreck, LLP*

INDEX TO SUPPLEMENTAL APPENDIX

<u>DOCUMENT</u>	<u>DATE</u>	<u>PAGE NOS.</u>
BHFS Invoices - Redacted	September 22, 2015 - November 14, 2016	SA0001 - SA0111
Order Regarding Motion for Assessment of Damages Against Eleanor Ahern	August 8, 2017	SA0112 - SA0127



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through August 31, 2015

TOTAL FEES \$ 43,814.00

COSTS

Research - Westlaw	\$ 1,239.33
Research - Lexis	21.16
Delivery/Ground Transportation	150.00
Filing Fee	(732.50)
Mileage/Parking Expense	35.00
Transcript Expense	420.76
Administrative Fee	1,095.35

Total Costs 2,229.10

Total Amount Due This Invoice **\$ 46,043.10**

SA0001

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
http: www.bhfs.com

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through August 31, 2015

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2015	K. Lenhard	Review supplement; prepare for hearing	0.60	595.00	\$ 357.00
08/01/2015	T. Peterson	Review and analyze supplement to motion for damages, enforcement of no contest clause, and surcharge; draft comments to same [.7]; strategize with K. Lenhard re [REDACTED] [.2]; emails re [REDACTED] [.2]; review and analyze motion to consolidate appeal [.3]	1.40	545.00	763.00
08/01/2015	B. Reitz	Research [REDACTED] begin drafting motion to strike; email T. Peterson and K. Lenhard re [REDACTED]	2.90	280.00	812.00
08/03/2015	K. Lenhard	Prepare for hearing	0.30	595.00	178.50
08/03/2015	T. Peterson	Email exchange with E. Ahern re [REDACTED] [.2]; review and analyze F. Waid response to motion to dismiss contempt proceedings; review issues re [REDACTED] [1.0]; telephone conference with F. Waid re Mann issues, trust documents [.4]; confer with K. Lenhard re [REDACTED] [.4]; draft	4.10	545.00	2,234.50

SA0002

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		communication to E. Ahern re [REDACTED] [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [2]; multiple emails from E. Ahern re [REDACTED] [REDACTED] draft communication to E. Ahern re [REDACTED] [3]; review Mann correspondence; draft communication to E. Ahern re Mann [REDACTED] [2]; review and revise motion to strike supplement, affidavit in support; confer with K. Lenhard re [REDACTED] [6]; telephone conference with E. Ahern re [REDACTED] [REDACTED] [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [2]; coordinate with B. Reitz re [REDACTED] [REDACTED] [REDACTED] [2]			
08/03/2015	B. Reitz	Review response to motion to dismiss contempt proceedings; continue drafting motion to strike; draft affidavit in support of order shortening time; telephone conference to judicial chambers re timing of motion on order shortening time; revise motion and affidavit based on telephone conference to Judge's clerk re timing for OST; discuss [REDACTED] with T. Peterson	4.10	280.00	1,148.00
08/04/2015	K. Lenhard	Prepare for argument	2.50	595.00	1,487.50
08/04/2015	T. Peterson	Emails from E. Ahern re [REDACTED] t [REDACTED] [2]; email exchange with E. Ahern re [REDACTED] [REDACTED] draft communication re [REDACTED] [REDACTED] [2]; strategize with K. Lenhard re [REDACTED] [REDACTED] [5]; review issues re what [REDACTED] [REDACTED]	2.70	545.00	1,471.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		review issues re [REDACTED] in preparation for upcoming hearing [1.8]			
08/04/2015	B. Reitz	Work with K. Lenhard in preparation for hearing on motion to assess damages; email K. Lenhard and T. Peterson re [REDACTED]	0.60	280.00	168.00
08/05/2015	K. Lenhard	Conference with client, court appearance and argument re contest clause; conference with Trustee	4.20	595.00	2,499.00
08/05/2015	T. Peterson	Review caselaw re [REDACTED] [3]; meet with E. Ahern re [REDACTED] [REDACTED] prepare for and attend hearing on motion to enforce no contest clause; meet with F. Waid re outstanding contempt issues; confer with E. Ahern re [REDACTED] [REDACTED] [3.6]; confer with K. Lenhard re [REDACTED] [8]	4.70	545.00	2,561.50
08/05/2015	B. Reitz	Debrief hearing on motion to assess damages with K. Lenhard and T. Peterson	0.10	280.00	28.00
08/06/2015	T. Peterson	Confer with K. Lenhard re [REDACTED] [5]; review communication from F. Waid re upcoming contempt hearing; draft communication to E. Ahern re [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [2]; email exchange with T. Moody re upcoming hearing [2]; work on motion to consolidate appeals [4]	1.50	545.00	817.50
08/06/2015	B. Reitz	Review email exchange between F. Waid and	0.10	280.00	28.00

SA0004

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 4

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		prior counsel re [REDACTED]			
08/07/2015	T. Peterson	Email from K. Lenhard re [REDACTED] [REDACTED] finalize motion for filing and coordinate same [1.3]; review communication from L. Wakayama re document requests to MAC [1.1]	0.40	545.00	218.00
08/07/2015	B. Reitz	Finalize and file motion to consolidate appeals	0.30	280.00	84.00
08/10/2015	T. Peterson	Draft communication to E. Ahern re [REDACTED] [REDACTED]; confer with K. Lenhard re [REDACTED] [REDACTED] [1.2]; review and analyze 5/12 [REDACTED] [REDACTED] in preparation for upcoming hearing on contempt [1.4]	1.60	545.00	872.00
08/11/2015	K. Lenhard	Prepare Reply	0.40	595.00	238.00
08/11/2015	B. Reitz	Discuss [REDACTED] [REDACTED] with T. Peterson; review prior briefs; draft reply; verify citations; revise brief with comments from T. Peterson; research [REDACTED] [REDACTED]	3.80	280.00	1,064.00
08/11/2015	B. Reitz	Review Mann motion and exhibits in preparation drafting opposition; email T. Peterson and K. Lenhard re [REDACTED]	0.40	280.00	112.00
08/11/2015	T. Peterson	Email from E. Ahern re [REDACTED]; review communication from K. Lenhard re [REDACTED] [REDACTED] [1.2]; confer with B. Reitz re [REDACTED] [REDACTED] [1.2]; review emails from E. Ahern; draft response to E. Ahern re	2.20	545.00	1,199.00

SA0005

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		<p>██████████</p> <p>██████████</p> <p>██████████ confer with K. Lenhard [4]; work on reply brief in support of motion to dismiss contempt; review documents provided by E. Ahern from prior counsel as to ██████████</p> <p>██████████ confer with K. Lenhard re ██████████ finalize reply brief in support of motion to dismiss contempt [1,2]; email exchange with B. Reitz re ██████████</p> <p>██████████ [2]</p>			
08/12/2015	B. Reitz	<p>Research ██████████</p> <p>██████████ (6); draft opposition to motion for adjudication of attorneys' lien (1,7)</p>	2.30	280.00	644.00
08/12/2015	T. Peterson	<p>Email from E. Ahern re ██████████</p> <p>review notice of vacating Mann deposition [2]; email to E. Ahern re ██████████</p> <p>██████████ email exchange with E. Ahern re ██████████</p> <p>██████████ review communications from E. Ahern re ██████████ [4]; email from F. Waid re information as to "Fred Smith"; draft communication to E. Ahern re ██████████ [2]; review communication from E. Ahern re ██████████</p> <p>██████████ draft communication re ██████████ [4]; multiple email exchanges with E. Ahern re ██████████</p> <p>██████████</p> <p>██████████</p> <p>review prior accounting records and affidavit of E. Ahern; draft communication to E. Ahern re ██████████</p> <p>██████████ [8]; confer with K. Lenhard re</p>	4.30	545.00	2,343.50

SA0006

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 6

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████ [3]; review and analyze ██████████ ██████████ for E. Ahern; review ██████████ ██████████; review ██████████ ██████████; confer with K. Lenhard [1.0]; analyze information previously requested; draft comprehensive email to E. Ahern re ██████████ ██████████ [1.0]			
08/13/2015	B. Reitz	Discuss Mann brief with T. Peterson and K. Lenhard	0.20	280.00	56.00
08/13/2015	T. Peterson	Review Waid request to transfer hearing [2]; review and analyze Waid response to motion to adjudicate attorney lien [3]; review and revise proposed opposition to motion for adjudication of attorney lien [4]; draft multiple communications to E. Ahern re ██████████ ██████████ [2]; confer with K. Lenhard re ██████████ ██████████ [2]; email exchange with E. Ahern re ██████████ ██████████ [2]; draft communication to T. Moody re production of documents; emails from F. Waid and T. Moody re production [2]; multiple email exchanges with E. Ahern re ██████████ [4]; review communication from E. Ahern re ██████████ ██████████ [1]	2.20	545.00	1,199.00
08/14/2015	T. Peterson	Review order from Nevada Supreme Court re F. Waid; draft communication to E. Ahern re ██████████ draft communication to E. Ahern re ██████████ ██████████ [3]	0.30	545.00	163.50
08/17/2015	K. Lenhard	Prepare for contempt argument	1.00	595.00	595.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 7

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/17/2015	T. Peterson	Review communication from E. Ahern re [REDACTED] analyze issues; draft communication to K. Lenhard re [REDACTED].3]; review and analyze motion to dismiss, opposition, affidavit, hearing transcript, in preparation for upcoming hearing [.5]; confer with K. Lenhard re [REDACTED].3]; multiple email exchanges with E. Ahern re [REDACTED].4]; email from T. Moody re exhibits to court [.1]	1.60	545.00	872.00
08/18/2015	T. Peterson	Prepare for and attend hearing on motion to dismiss contempt proceedings; court grants motion to dismiss [2.5]	2.50	545.00	1,362.50
08/18/2015	K. Lenhard	Court appearance, contempt hearing; conference with Trustee and Counsel	2.50	595.00	1,487.50
08/18/2015	B. Reitz	Prepare for hearing on motion to strike	0.30	280.00	84.00
08/19/2015	T. Peterson	Email from E. Ahern re [REDACTED]; confer with K. Lenhard re [REDACTED].2]; multiple emails from E. Ahern re [REDACTED] draft communication re [REDACTED] email exchange with E. Ahern re [REDACTED].4]; draft order granting motion to dismiss contempt proceeding [.3]	0.90	545.00	490.50
08/19/2015	B. Reitz	Begin drafting motion to withdraw; research [REDACTED]	2.40	280.00	672.00
08/20/2015	T. Peterson	Review communications from E. Ahern; review and revise motion to withdraw, affidavit in support [.5]; email from E. Ahern re [REDACTED] draft communication to E.	3.30	545.00	1,798.50

SA0008

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 8

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Ahern re [REDACTED] [2]; telephone conference [REDACTED] [3]; review and revise second draft of motion to withdraw [5]; draft communication to E. Ahern [2]; review multiple communications from E. Ahern; evaluate information re [REDACTED]; evaluate information re [REDACTED]; review [REDACTED]; confer with K. Lenhard and B. Reitz; draft communication to E. Ahern re [REDACTED]; email exchange with E. Ahern re [REDACTED] [1.6]			
08/20/2015	K. Lenhard	Prepare withdrawal documents	0.30	595.00	178.50
08/20/2015	B. Reitz	Work with T. Peterson and K. Lenhard re [REDACTED] telephone [REDACTED] with T. Peterson re [REDACTED]; research [REDACTED] [REDACTED] revise motion	2.80	280.00	784.00
08/21/2015	T. Peterson	Telephone conference with F. Waid re potential for settlement; invoice re "Fred Smith" [2]; email to F. Waid re invoice; email exchange with K. Lenhard [2]; review notices of deposition; review accounting; email exchange with K. Lenhard re [REDACTED] [REDACTED] [4]; draft communication to E. Ahern re [REDACTED] [REDACTED] draft communication to E. Ahern re [REDACTED] [4]; telephone conference with F. Waid; there is no chance of settlement [3]; draft communication to E. Ahern re [REDACTED] [2]	1.70	545.00	926.50
08/21/2015	K. Lenhard	Review subpoena; prepare for F. Waid telephone conference	0.40	595.00	238.00

SA0009

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 9

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/21/2015	K. Lenhard	Conference with Trustee	0.30	595.00	178.50
08/24/2015	K. Lenhard	Email client re [REDACTED]	0.20	595.00	119.00
08/24/2015	K. Lenhard	Review F. Brown issue; telephone conference with F. Waid; email client	0.70	595.00	416.50
08/24/2015	T. Peterson	Confer with K. Lenhard re [REDACTED] [REDACTED] [2]; review appeal docket re [REDACTED]; review communications from E. Ahern [2]; email from F. Waid re other invoice; review invoice; email to E. Ahern re [REDACTED] [2]; email exchange with E. Ahern re [REDACTED] [2]; confer with B. Reitz and K. Lenhard re [REDACTED] [4]	1.20	545.00	654.00
08/24/2015	B. Reitz	Work with T. Peterson re motion to extend time	0.10	280.00	28.00
08/25/2015	K. Lenhard	Review [REDACTED]; potential meeting problems	0.20	595.00	119.00
08/25/2015	T. Peterson	Emails from E. Ahern re [REDACTED] n [REDACTED] email to E. Ahern re [REDACTED] [REDACTED] email exchange with E. Ahern re [REDACTED] [REDACTED] [REDACTED] [REDACTED] s [6]; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED] [9]; work on issues re [REDACTED] [REDACTED] [4]; email exchange with B. Reitz re [REDACTED] review and	3.30	545.00	1,798.50

SA0010

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 10

FEEs

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		revise motion for extension of time [.4]; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED] [.7]; review transcript of court's findings re motion to dismiss contempt; revise order granting motion in accordance with same [.3]			
08/25/2015	B. Reitz	Draft and revise Notice of Non-Opposition to Motion to Consolidate Related Appeals; work with T. Peterson and K. Lenhard re same; draft Motion for Extension of Briefing Schedule' email opposing counsel re stipulation; review draft of emergency motion with T. Peterson	2.40	280.00	672.00
08/26/2015	K. Lenhard	Review App issues	0.30	595.00	178.50
08/26/2015	K. Lenhard	Email E. Ahern re [REDACTED]	0.30	595.00	178.50
08/26/2015	T. Peterson	Work on issues re [REDACTED] email from B. Reitz re [REDACTED]; review and revise motion for extension of time; review J. Powell email re denial of request for more time; finalize motion for extensions in all three appeals [.7]; email from E. Ahern re [REDACTED] [REDACTED] [.3]; review additional notices of deposition; email to E. Ahern re [REDACTED] [.1]; review multiple emails from C. Baggett re F. Waid statement; email exchange with K. Lenhard re [REDACTED] [.3]; review numerous communications from E. Ahern; draft communication to E. Ahern re [REDACTED] [REDACTED] [.7]; confer with K. Lenhard re [REDACTED] [.2]; email exchange with E.	3.50	545.00	1,907.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 11

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Ahern re [REDACTED] [REDACTED] [.4]; telephone conference with F. Waid re appeal issues, request for notice in appeal, potential for settlement, C. Baggett and F. Brown issues [.2]; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED] [REDACTED] [REDACTED] [.6]			
08/26/2015	B. Reitz	Revise emergency motions to extend time to comply with NRAP 26 and 31; telephone clerk of Supreme Court pursuant to NRAP 27(e); email opposing counsel re extension; discuss [REDACTED] with T. Peterson	1.60	280.00	448.00
08/27/2015	K. Lenhard	Prepare potential discovery	0.30	595.00	178.50
08/27/2015	K. Lenhard	Email client	0.20	595.00	119.00
08/27/2015	T. Peterson	Email from C. Baggett re F. Brown; review email from F. Brown [.2]; work on order granting motion to dismiss contempt proceedings; finalize order for submission to court [.5]; draft communication to T. Moody re draft order; email exchange with T. Moody re transcript of hearing [.4]; review communication from E. Ahern; confer with K. Lenhard; strategize re [REDACTED] [REDACTED] [REDACTED] [.4]; coordinate with B. Reitz re [REDACTED] [REDACTED] [.8]	2.30	545.00	1,253.50
08/27/2015	B. Reitz	Strategize with T. Peterson re [REDACTED]	2.10	280.00	588.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 12

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		<p>begin researching draft memorandum to K. Lenhard and T. Peterson re</p>			
08/28/2015	K. Lenhard	Outline settlement options	0.30	595.00	178.50
08/28/2015	T. Peterson	<p>Multiple email exchanges with B. Reitz re [4]; review commissions to take out of state depositions of L. Prucka, PMK of Anthony & Middlebrook, J. Johnson, C. Baggett, and F. Brown; review certificate of service; draft communication to E. Ahern re [3]; review communication from T. Moody; modify order accordingly; draft communication to T. Moody [3]; strategize with K. Lenhard re [4]</p>	1.40	545.00	763.00
08/28/2015	B. Reitz	Continue researching case law re	2.20	280.00	616.00
08/29/2015	T. Peterson	<p>Emails from E. Ahern, K. Lenhard re [3]; email exchange with K. Lenhard [2]</p>	0.20	545.00	109.00
08/29/2015	B. Reitz	Continue researching	1.20	280.00	336.00
08/31/2015	T. Peterson	<p>Review Supreme Court's order granting motion to consolidate [2]; telephone conference with F. Waid re consolidation, status of contempt, upcoming status conference [3]; draft communication to E. Ahern re [2]</p>	0.70	545.00	381.50
08/31/2015	K. Lenhard	Email Client re	0.20	595.00	119.00

Brownstein Hyatt Farber Schreck

Eleanor Allen
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client Matter #: 018177.0001
Page 13

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/31/2015	R. Lenhard	Review calendar; email Client	0.20	595.00	119.00
08/31/2015	R. Lenhard	Telephone conference with F. Waid	0.20	595.00	119.00
		Total Fees	93.50		\$ 43,814.00

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	15.00	595.00	\$ 9,282.00
Tamara (Tammy) Beatty Peterson	48.00	545.00	26,160.00
Benjamin K. Reitz	29.90	280.00	8,372.00
Total Fees	93.50		\$ 43,814.00

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/29/2015	Mileage/Parking Expense - Sheila Martinez - parking at Courthouse	\$ 8.00
07/16/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Clark County District Court	40.00
07/16/2015	Filing Fee - U.S. Bank - WIZNET; Electronic Filing Fee	1.50
07/20/2015	Mileage/Parking Expense - Parkway Center, LLC - Dates Incurred 7/20 and 7/29/15	27.00
07/21/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Hutchison & Steffen	15.00
07/22/2015	Filing Fee - Reversed on 9/16/2015, Eighth Judicial District Court - Bond for Filing Appeal	(500.00)
07/23/2015	Filing Fee - Reversed on 9/16/2015, Clerk Of The Supreme Court - Filing Fee for Notice of Appeal	(250.00)
07/29/2015	Filing Fee - U.S. Bank - WIZNET; Electronic Filing Fee	3.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client/Matter #: 018177.0001
Page 14

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/01/2015	Research - Westlaw - BKR-1884	191.71
08/03/2015	Research - Westlaw - BKR-1884	121.35
08/03/2015	Research - Lexis - BKR - 1884	9.57
08/03/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Clark County District Court	15.00
08/03/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
08/04/2015	Research - Westlaw - TBP-1527	127.81
08/04/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Clark County District Court	15.00
08/06/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Clark County District Court	10.00
08/06/2015	Transcript Expense - Treasurer, Clark County - Trust Dispute for Case #P-066425	55.00
08/11/2015	Research - Westlaw - BKR-1884	127.81
08/11/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
08/12/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - To Clark County District Court	10.00
08/13/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
08/19/2015	Research - Westlaw - BKR-1884	63.90
08/19/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Signed By: Delivered Docs	5.00
08/19/2015	Transcript Expense - Kristen Lunkwitz - Trust Dispute	262.70
08/20/2015	Research - Westlaw - BKR-1884	63.90
08/24/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Signed By: Delivered Check	5.00
08/24/2015	Transcript Expense - Florence M. Hoyt - Court Reporter Fees	73.06
08/24/2015	Transcript Expense - Treasurer, Clark County - Transcript Expense - Trust Dispute	30.00
08/26/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Signed By: Sarah Runyon	20.00
08/28/2015	Research - Westlaw - BKR-1884	542.85
08/28/2015	Research - Lexis - BKR - 1884	11.50
08/31/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Signed By: La Keisha Jefferson	15.00
09/23/2015	Administrative Fee for Services Through August 31, 2015	1,095.35
Total Costs:		\$ 2,229.10

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 15

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Delivery/Ground Transportation	\$ 150.00
Filing Fee	(732.50)
Mileage/Parking Expense	35.00
Research - Lexis	21.16
Research - Westlaw	1,239.33
Transcript Expense	420.76
Administrative Fee	1,095.35
	<hr/>
	\$ 2,229.10

Total Amount Due This Invoice	<hr/>	\$ 46,043.10
Previous Balance		\$ 58,079.31
Less Credits		-
TOTAL AMOUNT DUE		<hr/> \$ 104,122.41

SA0016

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001
Page 16

ARAGING

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121+</u>	<u>Total</u>
\$ -	\$ 58,079.31	\$ -	\$ -	\$ -	\$ 58,079.31

SUMMARY OF ACCOUNTS RECEIVABLE

<u>Date</u>	<u>Invoice No.</u>	<u>Amount</u>	<u>Credits</u>	<u>Adjustments</u>	<u>Balance</u>
07/30/2015	608814	\$ 57,647.35	\$(30,896.78)	\$ -	\$ 26,750.57
08/19/2015	611312	31,328.74	-	-	31,328.74
		<u>\$ 88,976.09</u>	<u>\$(30,896.78)</u>	<u>\$ -</u>	<u>\$ 58,079.31</u>

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: September 23, 2015
Invoice #: 615194
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through August 31, 2015

Previous Balance	\$ 58,079.31
Less Credits	-
Balance Forward	\$ 58,079.31
Total Fees	\$ 43,814.00
Total Costs	2,229.10
Total Amount Due This Invoice	\$ 46,043.10
TOTAL AMOUNT DUE	\$ 104,122.41

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 100 Broadway
Denver, CO 80203
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 615194

SA0018



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through September 30, 2015

TOTAL FEES \$ 19,765.50

COSTS

Filing Fee	\$ 10.50
Mileage/Parking Expense	27.00
Transcript Expense	177.15
Administrative Fee	494.14

Total Costs	708.79
-------------	--------

Total Amount Due This Invoice	\$ 20,474.29
--------------------------------------	---------------------

SA0019

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: October 09, 2015
Invoice #: 616822
Client Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through September 30, 2015

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/01/2015	T. Peterson	Confer with K. Lenhard re [REDACTED] [REDACTED] [REDACTED] [2]; review communication from E. Ahern; draft communication to E. Ahern re [REDACTED] [REDACTED] [3]	0.50	\$45.00	\$ 272.50
09/01/2015	K. Lenhard	Review emails; prepare for hearing	0.30	\$95.00	178.50
09/02/2015	T. Peterson	Review communication from E. Ahern re [REDACTED] [REDACTED] review correspondence from J. Cross [3]; confer with K. Lenhard re [REDACTED] [REDACTED] [2]; review communication from Texas counsel re [REDACTED] review notices of depositions; draft communications to E. Ahern re [REDACTED] [2]	0.70	\$45.00	381.50
09/02/2015	K. Lenhard	Court appearance; conference with counsel; email client	2.50	\$95.00	1,487.50
09/04/2015	T. Peterson	Review communication from E. Ahern; confer with K. Lenhard re [REDACTED] [REDACTED]; review communication from K. Lenhard; review communication from J. Cross [3]	0.30	\$45.00	163.50
09/04/2015	K. Lenhard	Email client re [REDACTED]	0.30	\$95.00	178.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████			
09/04/2015	K. Lenhard	Letter F. Waid	0.20	595.00	119.00
09/07/2015	T. Peterson	Emails from E. Ahern re ██████████; email exchange with K. Lenhard [.2]	0.20	545.00	109.00
09/08/2015	K. Lenhard	Conference with client	0.80	595.00	476.00
09/08/2015	K. Lenhard	Conference with F. Waid	0.20	595.00	119.00
09/08/2015	K. Lenhard	Review Trustee charts	0.20	595.00	119.00
09/08/2015	K. Lenhard	Conference with J. Shapiro	0.30	595.00	178.50
09/08/2015	T. Peterson	Prepare for and participate in conference with E. Ahern, K. Lenhard [1.0]; confer with K. Lenhard re ██████████, review F. Waid email; draft response to F. Waid [.2]; strategize with B. Reitz re ██████████ ██████████ [.3]; draft communication to T. Moody re ██████████ [.2]; draft communication to E. Ahern re ██████████ ██████████ ██████████ [.5]	2.20	545.00	1,199.00
09/09/2015	T. Peterson	Multiple emails from T. Moody re ██████████ ██████████ [.2]	0.20	545.00	109.00
09/09/2015	K. Lenhard	Email counsel re ██████████	0.20	595.00	119.00
09/10/2015	T. Peterson	Review communication from F. Waid re trust amounts collected; analyze information [.2]; confer with B. Reitz re ██████████ ██████████ [.3]; draft multiple communications to	0.90	545.00	490.50

SA0021

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		E. Ahern re [REDACTED] [REDACTED] [.2]; email exchange with K. Lenhard re [REDACTED] [REDACTED] [.2]			
09/10/2015	B. Reitz	Begin outlining motion for distribution of trust assets on order shortening time; begin drafting same	1.40	280.00	392.00
09/11/2015	T. Peterson	Telephone conference with J. Johnston [.2]; review prior correspondence to F. Waid; draft communication to J. Johnston [.2]; review communication from E. Ahern [.2]; review and analyze proposed motion for distribution; multiple communications re [REDACTED]; draft communication to K. Lenhard re [REDACTED] e [.5]	1.10	545.00	599.50
09/11/2015	K. Lenhard	Prepare expenses	0.60	595.00	357.00
09/11/2015	B. Reitz	Draft Affidavit of T. Peterson in support of motion for distribution of trust income; revise motion; email K. Lenhard and T. Peterson re [REDACTED]; draft letter to F. Waid re distributions for living and litigation expenses	1.90	280.00	532.00
09/12/2015	T. Peterson	Email from E. Ahern re [REDACTED]; review [REDACTED]; email exchange with K. Lenhard [.3]	0.30	545.00	163.50
09/14/2015	K. Lenhard	Prepare letter to Trustee	0.20	595.00	119.00
09/14/2015	K. Lenhard	Conference with F. Waid re K-1	0.30	595.00	178.50
09/14/2015	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00

FEEs

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/14/2015	T. Peterson	Email from L. Prucka re subpoena served; confer with K. Lenhard re [REDACTED] [2]; review and revise correspondence to F. Waid [4]; review communications from E. Ahern [2]; telephone conference with F. Waid re tax issues, J. Johnston, 1099-S [4]; strategize with K. Lenhard re [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [REDACTED] draft communication to E. Ahern re [REDACTED] [5]	1.90	545.00	1,035.50
09/14/2015	B. Reitz	Finalize draft of letter to F. Waid re distributions; provide same to T. Peterson; discuss [REDACTED] with T. Peterson	0.50	280.00	140.00
09/15/2015	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
09/15/2015	T. Peterson	Review order granting motion to dismiss; email Eleanor Ahern re [REDACTED] prepare notice of entry of order [2]; draft communication to F. Waid re K-1 address [2]; email exchange with E. Ahern re [REDACTED] [2]; review issues re [REDACTED] [REDACTED] [1.2]	1.80	545.00	981.00
09/16/2015	K. Lenhard	Court appearance, motion to unseal; conference with counsel L. Shapiro; email client	1.70	595.00	1,011.50
09/16/2015	K. Lenhard	Conference with accountant re [REDACTED]	0.20	595.00	119.00
09/16/2015	T. Peterson	Email exchange with E. Ahern re [REDACTED] [REDACTED] [2]; confer with K. Lenhard re [REDACTED] [REDACTED] [2]; email from L. Prucka; telephone conference with L. Prucka [4]	0.80	545.00	436.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/17/2015	T. Peterson	Review notices of deposition; review [REDACTED]; email exchange with K. Lenhard [.3]; review communication from T. Moody; draft multiple communications to E. Ahern re [REDACTED] [REDACTED] [.4]	0.70	545.00	381.50
09/17/2015	B. Reitz	Review and revise motion for distribution of trust income; email T. Peterson re same	0.40	280.00	112.00
09/17/2015	B. Reitz	Begin reviewing record for [REDACTED] [REDACTED]	0.80	280.00	224.00
09/18/2015	T. Peterson	Review multiple communications from E. Ahern re [REDACTED] [.3]; draft communication to E. Ahern re [REDACTED] [REDACTED] exchange with E. Ahern [.4]	0.70	545.00	381.50
09/18/2015	B. Reitz	Analyze [REDACTED]	1.10	280.00	308.00
09/21/2015	K. Lenhard	Conference with client	0.80	595.00	476.00
09/21/2015	T. Peterson	Confer with K. Lenhard re [REDACTED] [REDACTED] all in preparation for conference with client [.2]; draft and revise proposed authorization for L. Prucka [.3]; prepare for and attend conference with E. Ahern [.8]; draft communication to E. Waid re whether K-1 was sent [.2]; telephone conference with cashier from mailbox place [.2]; review communication from F. Waid re decline to send distribution [.2]	1.90	545.00	1,035.50
09/22/2015	K. Lenhard	Prepare application fees	0.20	595.00	119.00

SA0024

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/22/2015	T. Peterson	Draft communication to E. Ahern re [REDACTED] [2]; work on motion for distribution; review and revise exhibit to motion re living expenses [1.0]; review correspondence from F. Waid re 1099s issued; draft communication to E. Ahern re [REDACTED]; draft communication to E. Ahern re [REDACTED]; draft transmittal to F. Waid re correspondence to trust [.6]; review and analyze [REDACTED] [REDACTED] [5]	2.30	\$45.00	1,253.50
09/23/2015	T. Peterson	Email exchanges with E. Ahern re [REDACTED] [REDACTED]; finalize motion for filing [.3]	0.30	\$45.00	163.50
09/24/2015	T. Peterson	Multiple emails from E. Ahern re [REDACTED] [REDACTED] review communication from K. Lenhard; email exchange with E. Ahern; review deposition information re Baggett [.5]; review subpoena to Mail4You; draft communication to E. Ahern re [REDACTED] multiple email exchanges with E. Ahern re [REDACTED] [.6].	1.10	\$45.00	\$99.50
09/25/2015	T. Peterson	Emails from E. Ahern re [REDACTED] [REDACTED] draft communications to E. Ahern re [REDACTED] [2]; review order shortening time; email exchange with K. Lenhard; review E. Ahern communication; draft communication to E. Ahern re [REDACTED] [4]; email exchanges with E. Ahern re [REDACTED] [REDACTED] [4]; email exchanges with E. Ahern re [REDACTED] [REDACTED]; emails re [REDACTED]; draft communication to E. Ahern re [REDACTED] [.6]	1.60	\$45.00	872.00

Invoice Date: October 09, 2015
Invoice #: 616822
Client/Matter #: 018177.0001
Page 7

FEEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/25/2015	B. Reitz	Review transcripts of hearings on September 2nd and 16th	0.30	280.00	84.00
09/28/2015	T. Peterson	Review communication from E. Ahern re [REDACTED] [REDACTED] [REDACTED] [2]; email exchange with E. Ahern re [REDACTED] [REDACTED] [REDACTED] [2]; coordinate re [REDACTED] [REDACTED] [2]; draft communication to F. Waid re request for K-1 [2]; multiple emails re [REDACTED] [REDACTED] draft communication to E. Ahern re [REDACTED] [4]; review communication from F. Waid re tax return, K-1; draft communication to E. Ahern re [REDACTED] [2]	1.40	545.00	763.00
09/29/2015	T. Peterson	Email from E. Ahern re [REDACTED]; confer with K. Lenhard; coordinate re [REDACTED] [REDACTED] [2]	0.20	545.00	109.00
09/29/2015	B. Reitz	Draft Motion to Withdraw as Counsel	0.90	280.00	252.00
09/30/2015	T. Peterson	Review communication and correspondence from L. Prucka re upcoming deposition; draft multiple communications to E. Ahern re [REDACTED] [REDACTED] [4]; draft communication to E. Ahern re K-1; [REDACTED] [2]; review and revise motion to withdraw, affidavit in support [4]	1.00	545.00	545.00
09/30/2015	B. Reitz	Revise motion to withdraw with comments from T. Peterson	0.30	280.00	84.00
Total Fees			39.10		\$ 19,765.50

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001
Page 8

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	9.40	595.00	\$ 5,593.00
Tamara (Tammy) Beatty Peterson	22.10	545.00	12,044.50
Benjamin K. Reitz	7.60	280.00	2,128.00
Total Fees	39.10		\$ 19,765.50

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/05/2015	Mileage/Parking Expense - Parkway Center, LLC -	\$ 27.00
09/14/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
09/15/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
09/24/2015	Transcript Expense - Kristen Lunkwitz - Trust Dispute Case #P-066425	117.15
09/24/2015	Transcript Expense - Treasurer, Clark County - Trust Dispute	60.00
09/25/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
10/09/2015	Administrative Fee for Services Through September 30, 2015	494.14
	Total Costs	\$ 708.79

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Filing Fee	\$ 10.50
Mileage/Parking Expense	27.00
Transcript Expense	177.15
Administrative Fee	494.14
	\$ 708.79

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001
Page 9

Total Amount Due This Invoice	\$ 20,474.29
Previous Balance	\$ 104,122.41
Less Credits	-
TOTAL AMOUNT DUE	\$ 124,596.70

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001
Page 10

ARAGING

0 - 30	31 - 60	61 - 90	91 - 120	121+	Total
\$ 46,043.10	\$ 31,328.74	\$ 26,750.57	\$ -	\$ -	\$ 104,122.41

SUMMARY OF ACCOUNTS RECEIVABLE

Date	Invoice No.	Amount	Credits	Adjustments	Balance
07/30/2015	608814	\$ 57,647.35	\$(30,896.78)	\$ -	\$ 26,750.57
08/19/2015	611312	31,328.74	-	-	31,328.74
09/23/2015	615194	46,043.10	-	-	46,043.10
		<u>\$ 135,019.19</u>	<u>\$(30,896.78)</u>	<u>\$ -</u>	<u>\$ 104,122.41</u>

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: October 09, 2015
Invoice #: 616822
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through September 30, 2015

Previous Balance	\$ 104,122.41
Less Credits	-
Balance Forward	\$ 104,122.41
Total Fees	\$ 19,765.50
Total Costs	708.79
Total Amount Due This Invoice	\$ 20,474.29
TOTAL AMOUNT DUE	\$ 124,596.70

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 100 Broadway
Denver, CO 80203
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 616822

SA0030

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through October 31, 2015

TOTAL FEES \$ 33,656.50

COSTS

Research - Lexis	\$ 15.43
Filing Fee	10.50
Mileage/Parking Expense	34.00
Administrative Fee	841.41

Total Costs	901.34
-------------	--------

Total Amount Due This Invoice	\$ 34,557.84
--------------------------------------	---------------------

SA0031

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 23, 2015
Invoice #: 621331
Client Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through October 31, 2015

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/01/2015	T. Peterson	Emails from K. Lenhard re [REDACTED] confer with K. Lenhard re [REDACTED] [REDACTED] [2]	0.20	545.00	\$ 109.00
10/01/2015	B. Reitz	Finalize Motion to Withdraw in preparation for filing	0.20	280.00	56.00
10/02/2015	T. Peterson	Review subpoenas, notices of upcoming depositions [2]	0.20	545.00	109.00
10/05/2015	T. Peterson	Email exchange with K. Lenhard re [REDACTED] [REDACTED]; confer with K. Lenhard [3]; review correspondence from R. Whitt; review subpoenas and out of state deposition commissions; review motion to unseal [4]; draft multiple communications to E. Ahern re [REDACTED] [REDACTED] [5]; review and revise motion to withdraw for Supreme court case [3]; draft communication to E. Ahern re [REDACTED] [3]; telephone conference with T. Young [2]; draft communication to E. Ahern re [REDACTED] [2]	2.20	545.00	1,199.00
10/05/2015	B. Reitz	Research [REDACTED] [REDACTED] draft motion to withdraw from Supreme Court action; convert motion to	3.10	280.00	868.00

SA0032

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		withdraw to motion for extension of time; review and revise motion with comments from T. Peterson			
10/06/2015	K. Lenhard	Telephone conference with counsel for Ahern Rentals	0.30	595.00	178.50
10/06/2015	K. Lenhard	Telephone conference with T. Young of Ahern Rentals	0.20	595.00	119.00
10/06/2015	K. Lenhard	Telephone conference with client re [REDACTED] [REDACTED]	0.20	595.00	119.00
10/06/2015	T. Peterson	Review multiple communications re [REDACTED] draft multiple communications to E. Ahern re [REDACTED] [.4]; telephone conference with E. Ahern [.2]; draft communication to E. Ahern [REDACTED] [REDACTED] [.2]; multiple emails and email exchanges with E. Ahern [.3]	1.10	545.00	599.50
10/08/2015	K. Lenhard	Telephone conference with T. Young of Ahern Rentals	0.30	595.00	178.50
10/08/2015	K. Lenhard	Review F. Waid objections	0.20	595.00	119.00
10/08/2015	T. Peterson	Email from E. Ahern [.1]; telephone conference with T. Young re [REDACTED] [REDACTED] [.3]; telephone conference with F. Waid re [REDACTED] [REDACTED] [.3]; confer with K. Lenhard re [REDACTED] [REDACTED] [.2]; review items compiled for flash drive [.5]	1.40	545.00	763.00
10/08/2015	B. Reitz	Review [REDACTED] [REDACTED]	0.20	280.00	56.00

SA0033

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/09/2015	T. Peterson	Review communications from E. Ahern [2]	0.20	545.00	109.00
10/10/2015	T. Peterson	Review and analyze F. Waid response to motion to withdraw [3]; draft communication to E. Ahern re [2]	0.50	545.00	272.50
10/11/2015	B. Reitz	Continue reviewing documentation and arguments for appellate brief	0.90	280.00	252.00
10/12/2015	T. Peterson	Telephone conference with T. Young; [2]; draft communication to E. Ahern re [2]; email from E. Ahern re [2]; email from E. Ahern re [2]; draft communication to E. Ahern re [3]; email from E. Ahern re [2]; confer with K. Lenhard re [2]; coordinate with B. Reitz re [3]; multiple email exchanges with E. Ahern re [2]; [6]; telephone conference with K. Lenhard re [2]; review and revise reply brief in support of motion to withdraw; email exchange with B. Reitz [2]; draft communication to E. Ahern re [2]; confer with B. Reitz re [2]	2.40	545.00	1,308.00
10/12/2015	B. Reitz	Work on outline for appellate brief; draft Jurisdictional Statement; review [2]; continue reviewing documents for appellate brief	4.80	280.00	1,344.00

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client Matter #: 018177.0001
Page 4

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/13/2015	L. Huntley	Evaluate issues with B. Reitz re preparation of appendix for appeal	0.30	260.00	78.00
10/13/2015	L. Huntley	Begin compiling documents for preparation of appendix	2.20	260.00	572.00
10/13/2015	T. Peterson	Review multiple communications from E. Ahern re [REDACTED] review correspondence from F. Waid counsel in Texas; draft multiple communications to E. Ahern re [REDACTED] [4]; confer with K. Lenhard re [REDACTED] [2]	0.60	545.00	327.00
10/13/2015	B. Reitz	Continue reviewing documents for appeal; work on appendix to opening brief	6.10	280.00	1,708.00
10/13/2015	B. Reitz	Finalize and file reply to Waid's opposition to motion to withdraw	0.30	280.00	84.00
10/14/2015	L. Huntley	Complete compilation of documents for appendix and prepare chron index of same for appendix and evaluate [REDACTED]	4.50	260.00	1,170.00
10/14/2015	T. Peterson	Review multiple communications from E. Ahern; prepare for and attend hearing on motion to withdraw; meet with client post hearing [2.0]; draft communication to F. Waid re Prucka authorization [2]; email exchange with B. Reitz re [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [3]; review multiple letters from Cross; draft communication to E. Ahern re [REDACTED] [3]; telephone conference with K. Lenhard re [REDACTED] [2]; draft and revise order granting motion to withdraw [3]; draft communication to F. Waid, T. Moody, J. Powell	4.10	545.00	2,234.50

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		re order on motion to withdraw; emails from T. Moody, J. Powell re modifications to order [.4]; telephone conference with F. Waid re withdrawal [.2]			
10/14/2015	B. Reitz	Continue reviewing record and outlining opening appellate brief; research [REDACTED]	12.20	280.00	3,416.00
10/15/2015	T. Peterson	Multiple emails from E. Ahern and email exchanges with E. Ahern; confer with F. Waid; email to F. Waid re houses; telephone conference with K. Lenhard re [.6]; confer with B. Reitz re [REDACTED] [.2]; telephone conference with E. Ahern re houses [.2]; telephone conference with T. Moody and F. Waid re E. Ahern contacting J. Montoya, can we settle, can they talk to E. Ahern [.2]; draft communication to E. Ahern re [REDACTED] [.2]; review multiple communications from E. Ahern and F. Waid re [REDACTED]; review multiple communications from E. Ahern and F. Waid re [REDACTED]; review issues re [REDACTED]; draft communication to E. Ahern re [REDACTED] [.8]	2.20	545.00	1,199.00
10/15/2015	B. Reitz	Continue outlining argument for opening appellate brief	1.60	280.00	448.00
10/15/2015	B. Reitz	Draft renewed motion for extension of time to file opening appellate brief	1.10	280.00	308.00
10/16/2015	T. Peterson	Emails from E. Ahern re [REDACTED]; draft communication to E. Ahern re [REDACTED]; review multiple communications from E. Ahern re [REDACTED] [.6]; revise motion for	1.70	545.00	926.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client/Matter #: 018177.0001
Page 6

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Supreme court re continuance, potential collateral issues [.4]; confer with K. Lenhard [.2]; draft communication to F. Waid re collateral issues [.3]; draft communications to E. Ahern re [REDACTED] [REDACTED] [.2]			
10/16/2015	B. Reitz	Work on opening appellate brief; draft statement of issues for review; draft section headers for argument section	5.30	280.00	1,484.00
10/16/2015	B. Reitz	Revise motion for extension of time with comments from T. Peterson and K. Lenhard	0.40	280.00	112.00
10/18/2015	B. Reitz	Research [REDACTED] [REDACTED]	1.20	280.00	336.00
10/19/2015	L. Huntley	Revise index to appendix	0.10	260.00	26.00
10/19/2015	K. Lenhard	Conference with F. Waid; follow-up email	0.30	595.00	178.50
10/19/2015	T. Peterson	Review communication from E. Ahern re [REDACTED] [.2]; telephone conference with F. Waid re collateral [.2]; email to E. Ahern re [REDACTED] [.2]	0.60	545.00	327.00
10/19/2015	B. Reitz	Research [REDACTED] [REDACTED] draft Statement of the Case; begin drafting fact section; draft argument section re failure to move for summary judgment on merits	8.60	280.00	2,408.00
10/20/2015	L. Huntley	Evaluate issues re [REDACTED]	0.10	260.00	26.00
10/20/2015	T. Peterson	Emails from E. Ahern re [REDACTED] email from F. Waid re collateral; email exchange with B. Reitz re [REDACTED]; draft communication to E. Ahern re	0.40	545.00	218.00

SA0037

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client/Matter #: 018177.0001
Page 7

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████ [4]			
10/20/2015	B. Reitz	Continue working on opening appellate brief	6.20	280.00	1,736.00
10/20/2015	B. Reitz	Telephone F. Waid re collateral; prepare for oral argument re distribution of trust income	1.00	280.00	280.00
10/21/2015	T. Peterson	Multiple emails re e. Ahern, ██████████ ██████████ telephone conference with B. Reitz re ██████████ [2]	0.20	545.00	109.00
10/21/2015	B. Reitz	Attend follow-up hearing on motion to withdraw; draft summary email to T. Peterson and K. Lenhard re ██████████; revise order granting motion to withdraw; draft motion to file under seal	1.90	280.00	532.00
10/21/2015	B. Reitz	Draft reply in support of motion for distribution of trust income	0.70	280.00	196.00
10/21/2015	B. Reitz	Research ██████████ ██████████	1.80	280.00	504.00
10/22/2015	T. Peterson	Review potential reply brief in support of trust distributions; review issues re ██████████ [4]; confer with B. Reitz re ██████████ [2]	0.60	545.00	327.00
10/22/2015	B. Reitz	Continue working on appellate brief section on laches	3.70	280.00	1,036.00
10/23/2015	T. Peterson	Confer with K. Lenhard re ██████████ ██████████ ██████████ [3]; draft communication to E. Ahern re ██████████ [3]	0.60	545.00	327.00
10/26/2015	K. Lenhard	Email re deposition	0.20	595.00	119.00

SA0038

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client/Matter #: 018177.0001
Page 8

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/26/2015	T. Peterson	Review Supreme Court order granting extension of time to file brief [.2]; confer with B. Reitz re [REDACTED] [.2]; email exchange with E. Ahern [.2]; draft and revise demand letter to Fred Waid re distribution of Funds [.4]; draft communications to E. Ahern re [REDACTED] [.2]	1.20	545.00	654.00
10/26/2015	B. Reitz	Strategize with T. Peterson re [REDACTED] [REDACTED]	0.20	280.00	56.00
10/26/2015	B. Reitz	Review letter from T. Peterson to F. Waid; discuss same with T. Peterson	0.20	280.00	56.00
10/27/2015	K. Lenhard	Review Trustee position, distribution	0.20	595.00	119.00
10/27/2015	K. Lenhard	Conference E. Ahern	0.30	595.00	178.50
10/27/2015	T. Peterson	Telephone conference with R. Geist and F. Waid [.4]; confer with K. Lenhard re [REDACTED] [.2]; review and revise reply brief in support of motion for distributions [.2]; prepare for and conference with E. Ahern [1.0]	1.80	545.00	981.00
10/27/2015	B. Reitz	Work with T. Peterson re motion for distribution of funds	0.10	280.00	28.00
10/28/2015	T. Peterson	Draft communication to E. Ahern re [REDACTED] f [REDACTED] [.2]; review correspondence from F. Waid re distribution request [.2]	0.40	545.00	218.00
10/29/2015	T. Peterson	Review Powell rogue response to reply for motion to distribute funds [.2]; email to E. Ahern re [REDACTED] email exchange with K. Lenhard [.2]; emails from E. Ahern re [REDACTED] [.2]	0.60	545.00	327.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001
Page 9

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/30/2015	T. Peterson	Review multiple communications from E. Ahern re [REDACTED] email exchange with E. Ahern re [REDACTED] [.]	0.30	545.00	163.50
10/31/2015	B. Reitz	Review Sisters' response to reply in support of motion for distribution of trust income; begin drafting memorandum re arguments on appeal	1.30	280.00	364.00
Total Fees			<u>96.00</u>		<u>\$ 33,656.50</u>

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	2.20	595.00	\$ 1,309.00
Tamara (Tammy) Beatty Peterson	23.50	545.00	12,807.50
Benjamin K. Reitz	63.10	280.00	17,668.00
Lorelei D. Huntley	7.20	260.00	1,872.00
Total Fees	<u>96.00</u>		<u>\$ 33,656.50</u>

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/02/2015	Mileage/Parking Expense - Cash - Parking at Court House for Status Check	\$ 8.00
09/08/2015	Mileage/Parking Expense - Parkway Center, LLC - Dates Incurred 9/8 and 9/21/15	18.00
09/18/2015	Mileage/Parking Expense - Cash - Parking at Court House	8.00
10/06/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
10/13/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50

SA0040

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001
Page 10

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/20/2015	Research - Lexis - BKR - 1884	7.72
10/22/2015	Research - Lexis - BKR - 1884	7.71
10/27/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
11/23/2015	Administrative Fee for Services Through October 31, 2015	841.41
	Total Costs	\$ 901.34

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Filing Fee	\$ 10.50
Mileage/Parking Expense	34.00
Research - Lexis	15.43
Administrative Fee	841.41
	\$ 901.34

Total Amount Due This Invoice	\$ 34,557.84
Previous Balance	\$ 124,596.70
Less Credits	-
TOTAL AMOUNT DUE	\$ 159,154.54

SA0041

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001
Page 11

ARAGING

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121+</u>	<u>Total</u>
\$ -	\$ 20,474.29	\$ 46,043.10	\$ 58,079.31	\$ -	\$ 124,596.70

SUMMARY OF ACCOUNTS RECEIVABLE

<u>Date</u>	<u>Invoice No.</u>	<u>Amount</u>	<u>Credits</u>	<u>Adjustments</u>	<u>Balance</u>
07/30/2015	608814	\$ 57,647.35	\$(30,896.78)	\$ -	\$ 26,750.57
08/19/2015	611312	31,328.74	-	-	31,328.74
09/23/2015	615194	46,043.10	-	-	46,043.10
10/09/2015	616822	20,474.29	-	-	20,474.29
		\$ 155,493.48	\$(30,896.78)	\$ -	\$ 124,596.70

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 23, 2015
Invoice #: 621331
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through October 31, 2015

Previous Balance	\$ 124,596.70
Less Credits	-
Balance Forward	\$ 124,596.70
Total Fees	\$ 33,656.50
Total Costs	901.34
Total Amount Due This Invoice	\$ 34,557.84
TOTAL AMOUNT DUE	\$ 159,154.54

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 100 Broadway
Denver, CO 80203
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 621331

SA0043



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through December 31, 2015

TOTAL FEES \$ 62,943.00

COSTS

Research - Westlaw	\$ 314.52	
Research - Lexis	123.62	
Filing Fee	7.00	
Mileage/Parking Expense	89.00	
Transcript Expense	502.77	
Administrative Fee	1,573.58	
	<hr/>	
Total Costs		2,610.49
Total Amount Due This Invoice		<hr/> \$ 65,553.49 <hr/>

SA0044

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: January 08, 2016
Invoice #: 625438
Client Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through December 31, 2015

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/02/2015	K. Lenhard	Prepare for hearing	0.30	595.00	\$ 178.50
11/02/2015	T. Peterson	Review multiple communications from E. Ahern [.4]; telephone conference with K. Lenhard re [REDACTED] [.2]; prepare supplement to reply in support of motion for distribution; finalize supplement for filing [.3]; draft multiple communications to E. Ahern re [REDACTED] [.2]; confer with B. Reitz re [REDACTED] [REDACTED] [REDACTED] [.5]; review motion to compel Ahern's authorization filed on order shortening time [.4]	2.00	545.00	1,090.00
11/02/2015	B. Reitz	Strategize with Tammy re [REDACTED] [REDACTED] [REDACTED]	0.40	280.00	112.00
11/03/2015	B. Reitz	Research case law re [REDACTED] [REDACTED]	1.60	280.00	448.00
11/03/2015	K. Lenhard	Prepare for hearing	0.70	595.00	416.50
11/03/2015	T. Peterson	Confer with K. Lenhard re [REDACTED] [REDACTED] [.3]; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED]	2.00	545.00	1,090.00

SA0045

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████ [9]; email exchange with K. Lenhard [2]; prepare second supplement to motion for distribution to include additional information from client [2]; review communication from B. Reitz re ██████████ [2]; email exchange with K. Lenhard re ██████████ [2]			
11/04/2015	L. Huntley	Evaluate ██████████ ██████████ ██████████	0.10	260.00	26.00
11/04/2015	K. Lenhard	Court hearing; preparation, motion to distribute, objection, waiver privilege	4.00	595.00	2,380.00
11/04/2015	T. Peterson	Prepare for and attend hearing on motion for distribution of trust income [4.0]; draft communication to E. Ahern re ██████████ ██████████ [4]; review communication from R. Geist re sealed document; review proposed stipulation; draft communication to E. Ahern re ██████████ [2]; review description of withheld documents submitted by J. Johnston [2]	4.80	545.00	2,616.00
11/05/2015	T. Peterson	Review communication re ██████████ ██████████ [2]; telephone conference with F. Waid re issues with other beneficiaries, creditors, potential petition he would like to file [5]; confer with K. Lenhard re ██████████ ██████████ [2]; draft communication to E. Ahern re ██████████ ██████████ [2]; emails from T. Moody and J. Powell re authorization [2]	1.30	545.00	708.50
11/06/2015	T. Peterson	Review and analyze ██████████	6.10	545.00	3,324.50

SA0046

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████; draft comments to same to T. Moody; draft communication to E. Ahern re ██████████ [.5]; email exchange with E. Ahern re ██████████ [.2]; review and analyze draft appellate brief; work on issues re ██████████ ██████████ ██████████ [3.5]; revise proposed authorization re ██████████ ██████████ ██████████ [7]; draft communication to T. Moody re revised authorization [.2]; telephone conference with F. Waid re ██████████ [.2]; draft comments to B. Reitz and K. Lenhard re ██████████ brief [.8]			
11/06/2015	B. Reitz	Review memorandum from T. Peterson re ██████████	0.10	280.00	28.00
11/06/2015	K. Lenhard	Review edits, authorization	0.20	595.00	119.00
11/09/2015	T. Peterson	Multiple emails from E. Ahern; email exchange with E. Ahern re ██████████ ██████████ [.2]; review comments from B. Reitz re ██████████ [.2]; strategize with B. Reitz re ██████████ [.4]; review communication re ██████████ [.2]	1.00	545.00	545.00
11/09/2015	B. Reitz	Review and respond to memorandum from T. Peterson re ██████████ research ██████████; review district court record ██████████	4.10	280.00	1,148.00
11/10/2015	K. Lenhard	Review revised authorization; prepare opening brief	1.20	595.00	714.00
11/10/2015	K. Lenhard	Review telephone conference, issues re	0.40	595.00	238.00

SA0047

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 4

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		authorization tender, funds			
11/10/2015	K. Lenhard	Telephone conference with F. Waid re bond, sisters' approval	0.20	\$95.00	119.00
11/10/2015	K. Lenhard	Review research [REDACTED]	0.20	\$95.00	119.00
11/10/2015	T. Peterson	Review and analyze [REDACTED] [REDACTED] [REDACTED] [1.5]; email exchange with E. Ahern re [REDACTED] [REDACTED] [2]; confer with K. Lenhard and B. Reitz re [REDACTED] [3]; prepare for and participate in telephone conference with E. Ahern, J. Johnston, and S. Clayton [1.5]; strategize with K. Lenhard re [REDACTED] [REDACTED] [1.5]; review laches caselaw, arguments [2]	4.20	\$545.00	2,289.00
11/10/2015	B. Reitz	Email opposing counsel re joint appendix to appellate briefs; provide K. Lenhard with draft of opening briefs; strategize with K. Lenhard and T. Peterson re [REDACTED] research [REDACTED] email K. Lenhard and T. Peterson re [REDACTED]	3.30	\$280.00	\$924.00
11/11/2015	K. Lenhard	Prepare for conference	0.30	\$95.00	178.50
11/11/2015	T. Peterson	Strategize with K. Lenhard re [REDACTED] [REDACTED] [1.5]; email exchanges with E. Ahern re [REDACTED] [REDACTED] [3]; review proposed court order from T. Moody re payment [2]; prepare for upcoming conference with E. Ahern [1.0]	2.00	\$545.00	1,090.00

SA0048

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client/Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/11/2015	B. Reitz	Continue working on opening appellate brief	7.20	280.00	2,016.00
11/12/2015	T. Peterson	Email exchange with J. Johnston [.2]; review issues re [REDACTED] [REDACTED] [.8]; multiple communications from E. Ahern re [REDACTED] [REDACTED] [.4]; prepare for and conference with E. Ahern re [REDACTED] [REDACTED] [1.2]; review information from F. Waid re deposits and allocations; draft communication to E. Ahern re [REDACTED] [.2]; draft communication to E. Ahern re [REDACTED] [.2]; review communication from J. Powell re order instructing trustee to advance funds; draft communication to E. Ahern re [REDACTED] [.2]	3.20	545.00	1,744.00
11/12/2015	K. Lenhard	Prepare for conference	0.30	595.00	178.50
11/12/2015	K. Lenhard	Conference with clients	0.80	595.00	476.00
11/12/2015	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
11/12/2015	B. Reitz	Continue working on opening appellate brief	6.10	280.00	1,708.00
11/13/2015	T. Peterson	Confer with B. Reitz re [REDACTED] [REDACTED] [.2]; email exchange with J. Powell re draft order [.2]; telephone conference with F. Waid re authorization, order, [REDACTED] [.4]; telephone conference with K. Lenhard re [REDACTED] [.2]; draft tender letter [.3]; review correspondence from Baxter [.2]; draft multiple communications to E. Ahern re [REDACTED]	1.90	545.00	1,035.50

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client/Matter #: 018177.0001
Page 6

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		[REDACTED] [REDACTED] [REDACTED] [4]			
11/13/2015	L. Huntley	Examine voluminous pleadings, transcripts, minutes and email communications re competing order on summary judgment and evaluate issues with B. Reitz re [REDACTED] [REDACTED] [REDACTED] research file re [REDACTED] [REDACTED] revise index to appendix and begin preparation of appendix volume covers	4.30	260.00	1,118.00
11/13/2015	K. Lenhard	Review [REDACTED] review [REDACTED]	0.20	595.00	119.00
11/13/2015	K. Lenhard	Conference with counsel re tender of funds	0.20	595.00	119.00
11/13/2015	B. Reitz	Work with L. Huntley re competing order on motion for summary judgment; continue working on opening appellate brief	4.70	280.00	1,316.00
11/14/2015	T. Peterson	Multiple email exchanges with B. Reitz re [REDACTED] [REDACTED] [5]	0.50	545.00	272.50
11/14/2015	B. Reitz	Continue working on opening appellate brief	4.20	280.00	1,176.00
11/16/2015	L. Huntley	Evaluate [REDACTED] [REDACTED] and telephone conference with Nevada Supreme Court re same and begin preparation of electronic appendix for opening brief	6.20	260.00	1,612.00
11/16/2015	T. Peterson	Review detailed voice mail message from E.	0.90	545.00	490.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 7

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Ahern [REDACTED] [REDACTED]; review correspondence from physician re [REDACTED] [.2]; confer with K. Lenhard re [REDACTED] [REDACTED] [.2]; draft communication to E. Ahern re [REDACTED] [.3]; review issues re [REDACTED] [.2]			
11/17/2015	L. Huntley	Continue preparation of electronic copy of appendix for electronic filing; coordinate and organize four copies of hard copy appendices to be filed under seal; update index to appendix with volume and document numbers assigned; prepare certificate of service for hard copy appendix volumes; evaluate issues re same and telephone conference with Supreme Court Clerk re use of drop box for hard copies	6.30	260.00	1,638.00
11/17/2015	T. Peterson	Review detailed voice mail message from E. Ahern; draft communication to E. Ahern, [REDACTED] [REDACTED] [.2]; email exchange with L. Huntley re [REDACTED] [REDACTED] work on issues re appendix [.5]; finalize tender letter [.2]; telephone conference with F. Waid re tender letter, tax implications, upcoming deposition; [REDACTED] [REDACTED] [.3]; draft communication to E. Ahern re [REDACTED] [REDACTED] [.2]; draft communication to T. Moody re proposed order [.2]	1.60	545.00	872.00
11/18/2015	K. Lenhard	Conference with Trustee	0.30	595.00	178.50
11/18/2015	L. Huntley	Continue preparation of electronic copy of appendix for electronic filing; draft letter to	6.70	260.00	1,742.00

SA0051

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 8

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Nevada Supreme Court to transmit appendix volumes to be filed under seal			
11/18/2015	T. Peterson	Review detailed voice mail message from E. Ahern; telephone conference with F. Waid re deposition, doctor's note, tax issues on tender [.4]; draft communication to E. Ahern re [REDACTED] [.2]; review fax from E. Ahern; draft email response to fax [.3]; review court transcript on authorization; draft communication to E. Ahern re [REDACTED] [.4]; review fax from Dr. Baxter; review communication from F. Waid re deposition; draft communication to E. Ahern; review voice mail from E. Ahern; review email from E. Ahern; email to E. Ahern re [REDACTED] email exchange with T. Moody re Baxter fax [.6]	1.90	545.00	1,035.50
11/18/2015	B. Reitz	Work on opening appellate brief	7.00	280.00	1,960.00
11/18/2015	M. Turner	Work on Appendix Index with L. Huntley	2.00	175.00	350.00
11/19/2015	L. Huntley	Review draft opening brief and research pin cites to record for same	3.90	260.00	1,014.00
11/19/2015	L. Huntley	Research and add additional documents to appendix and revise and finalize electronic copy of 17 volumes of appendix for filing with Nevada Supreme Court	5.50	260.00	1,430.00
11/19/2015	L. Huntley	Complete finalization of hard copy volumes of appendix to be filed under seal	0.60	260.00	156.00
11/19/2015	J. Lavigne	Draft motion to file opening brief in excess of word limit, affidavit in support of motion, and certificate of compliance	2.70	270.00	729.00

SA0052

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client Matter #: 018177.0001
Page 9

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/19/2015	T. Peterson	Review detailed voice mail messages from E. Ahern; email exchange with B. Reitz re [REDACTED] email exchange with T. Moody re deposition, hearing, attendance requirements [.4]; telephone conference with F. Waid re accounting issues; [REDACTED] [.2]; draft communication to F. Waid re transcript of authorization hearing; draft multiple communications to E. Ahern re [REDACTED] [REDACTED] [.3]; work on issues re [REDACTED] work with B. Reitz on appellate brief [3.3]; telephone conference with K. Lenhard re [REDACTED] [.2]; review and analyze second version of appellate brief [.4]; email exchange with B. Reitz and K. Lenhard re [REDACTED] [.2]	5.00	545.00	2,725.00
11/19/2015	K. Lenhard	Review and edit brief	1.00	595.00	595.00
11/19/2015	B. Reitz	Work on opening appellate brief; insert citations to appendix	14.60	280.00	4,088.00
11/19/2015	M. Turner	Assist with saving documents from CD to filesite	3.00	175.00	525.00
11/20/2015	L. Huntley	Research pin cites for opening brief	0.30	260.00	78.00
11/20/2015	T. Peterson	Review and revise third version of appellate brief; review and revise motion to exceed page limit if needed [1.3]; multiple emails re [REDACTED] [.2]; review subpoena to A. Matthews; review emails from T. Moody; draft communication to T. Moody re status of orders; draft multiple communications to E. Ahern re [REDACTED] [.4]; review S.	3.40	545.00	1,853.00

SA0053

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 10

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Clayton comments; review J. Johnston comments [.3]; telephone conference with K. Lenhard re [REDACTED] [.2]; review and finalize brief for filing [1.0]			
11/20/2015	K. Lenhard	Review and edit revised facts	0.50	595.00	297.50
11/20/2015	K. Lenhard	Prepare final edits	0.40	595.00	238.00
11/20/2015	J. Lavigne	Draft motion to file opening brief in excess of word limit, affidavit in support of motion, and certificate of compliance	0.70	270.00	189.00
11/20/2015	B. Reitz	Continue drafting opening appellate brief; finalize brief for filing	5.50	280.00	1,540.00
11/23/2015	T. Peterson	Review correspondence from J. Powell to F. Waid re E. Ahern deposition [.3]; review communication from T. Moody re order; email exchange with T. Moody [.2]; draft multiple communications to E. Ahern	0.50	545.00	272.50
11/24/2015	T. Peterson	Review correspondence from T. Moody; review F. Waid supplemental production [.2]	0.20	545.00	109.00
11/24/2015	K. Lenhard	Review Trustee's production	0.20	595.00	119.00
11/25/2015	T. Peterson	Review facsimile from E. Ahern [.2]; prepare for and attend conference with F. Waid and R. Geist [1.5]; email exchange with B. Reitz re [REDACTED] [REDACTED] [REDACTED] [.2]; telephone conference with K. Lenhard re [REDACTED] [.4]; draft communication to E. Ahern re [REDACTED] [REDACTED] [.4]; review and finalize motion to seal portions of filed appendix for filing [.2]; review	3.70	545.00	2,016.50

SA0054

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client/Matter #: 018177.0001
Page 11

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		communication from S. Bruce re Real Estate Services; review and analyze Wells Fargo production; draft communication to E. Ahern re [REDACTED] [5]; review S. McNair production of documents [2]; review correspondence from J. Powell to court; draft communication to E. Ahern re [REDACTED] [1]			
11/25/2015	B. Reitz	Review [REDACTED] telephone Supreme Court Clerk re same; email K. Lenhard and T. Peterson re [REDACTED]; draft Motion to File Portions of Appendix Under Seal; review [REDACTED] email T. Peterson re [REDACTED]	1.40	280.00	392.00
12/01/2015	T. Peterson	Review signed court order re authorization; draft communication to E. Ahern re [REDACTED] [2]	0.20	545.00	109.00
12/02/2015	K. Lenhard	Review F. Waid conference; outline order	0.20	595.00	119.00
12/02/2015	T. Peterson	Email exchange with K. Lenhard re [REDACTED] [REDACTED] [REDACTED] [3]	0.30	545.00	163.50
12/04/2015	T. Peterson	Review and analyze proposed stipulation for extension of time for respondent's brief; draft multiple communications to E. Ahern re [REDACTED] [3]; email from T. Moody re authorization; draft communication to E. Ahern re [REDACTED] [2]	0.50	545.00	272.50
12/09/2015	K. Lenhard	Review fax from E. Ahern; email counsel	0.20	595.00	119.00
12/09/2015	T. Peterson	Review facsimile received from E. Ahern; email exchange with K. Lenhard re [REDACTED] [3]	0.30	545.00	163.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 12

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/14/2015	T. Peterson	Telephone conference with F. Waid [.2]; draft communication to E. Ahern [.2]; review communication from T. Moody; draft communication to E. Ahern re [REDACTED] [.2]	0.60	545.00	327.00
12/16/2015	T. Peterson	Review F. Waid fourth supplemental production of documents re redacted billing records from D. Mann; draft communication to E. Ahern re [REDACTED] review correspondence from S. McNair [.3]; review correspondence from E. Ahern [.1]	0.40	545.00	218.00
12/17/2015	T. Peterson	Review correspondence from Dr. M. Baxter re [REDACTED] [.2]; confer with K. Lenhard; draft communication to E. Ahern re [REDACTED] [.3]	0.50	545.00	272.50
12/18/2015	T. Peterson	Review correspondence from E. Ahern; email exchange with T. Moody re meet and confer [.2]; review detailed voice mail from E. Ahern; draft communication to T. Moody; review fax from E. Ahern; draft communication to E. Ahern re [REDACTED] [.5]; draft communication to E. Ahern re [REDACTED] [.5]; telephone conference with T. Moody [.2]	1.40	545.00	763.00
12/21/2015	T. Peterson	Review multiple detailed voice mail messages from E. Ahern; [REDACTED] [.2]; draft communication to E. Ahern [.2]; review communication from T. Moody; draft communication to E. Ahern re [REDACTED] [.2]; review order from Supreme Court; draft	0.80	545.00	436.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client/Matter #: 018177.0001
Page 13

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		communication to E. Ahern re [REDACTED].2]			
12/22/2015	T. Peterson	Review letter re [REDACTED]; review detailed voice mail message from E. Ahern re [REDACTED] [REDACTED] draft communication to E. Ahern [REDACTED].4]	0.40	545.00	218.00
12/23/2015	T. Peterson	Review detailed voice mail from E. Ahern; email exchange with K. Lenhard [REDACTED].2]	0.20	545.00	109.00
12/28/2015	T. Peterson	Review correspondence from S. McNair re audit results from prior years [REDACTED].2]	0.20	545.00	109.00
Total Fees			166.50		\$ 62,943.00

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	12.00	595.00	\$ 7,140.00
Tamara (Tammy) Beatty Peterson	52.00	545.00	28,340.00
Benjamin K. Reitz	60.20	280.00	16,856.00
Jeffrey J. Lavigne	3.40	270.00	918.00
Lorelei D. Huntley	33.90	260.00	8,814.00
Monica L. Turner	5.00	175.00	875.00
Total Fees	166.50		\$ 62,943.00

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/12/2015	Mileage/Parking Expense - Cash - Parking at Courthouse	\$ 12.00

SA0057

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client Matter #: 018177.0001
Page 14

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/27/2015	Mileage/Parking Expense - Parkway Center, LLC -	9.00
11/02/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
11/03/2015	Research - Westlaw - BKR-1884	314.52
11/03/2015	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
11/09/2015	Research - Lexis - BKR - 1884	38.03
11/10/2015	Research - Lexis - BKR - 1884	76.08
11/10/2015	Mileage/Parking Expense - Cash - Parking at Courthouse	14.00
11/10/2015	Mileage/Parking Expense - Cash - Parking at Courthouse	18.00
11/12/2015	Mileage/Parking Expense - Parkway Center, LLC - Dates Incurred 11/12 and 11/25/15	36.00
11/17/2015	Transcript Expense - Kristen Linkwitz - Trust Dispute - Eleanor Ahern	462.77
11/17/2015	Transcript Expense - Treasurer, Clark County - Trust Dispute - Eleanor Ahern	40.00
11/20/2015	Research - Lexis - BKR - 1884	9.51
01/08/2016	Administrative Fee for Services Through December 31, 2015	1,573.58
	Total Costs	\$ 2,610.49

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Filing Fee	\$ 7.00
Mileage/Parking Expense	89.00
Research - Lexis	123.62
Research - Westlaw	314.52
Transcript Expense	502.77
Administrative Fee	1,573.58
	\$ 2,610.49

SA0058

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 15

Total Amount Due This Invoice	\$ 65,553.49
Previous Balance	\$ 159,154.54
Less Credits	-
TOTAL AMOUNT DUE	\$ 224,708.03

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001
Page 16

ARAGING

0 - 30	31 - 60	61 - 90	91 - 120	121+	Total
\$ -	\$ 34,557.84	\$ -	\$ 124,596.70	\$ -	\$ 159,154.54

SUMMARY OF ACCOUNTS RECEIVABLE

Date	Invoice No.	Amount	Credits	Adjustments	Balance
07/30/2015	608814	\$ 57,647.35	\$(30,896.78)	\$ -	\$ 26,750.57
08/19/2015	611312	31,328.74	-	-	31,328.74
09/23/2015	615194	46,043.10	-	-	46,043.10
10/09/2015	616822	20,474.29	-	-	20,474.29
11/23/2015	621331	34,557.84	-	-	34,557.84
		\$ 190,051.32	\$(30,896.78)	\$ -	\$ 159,154.54

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: January 08, 2016
Invoice #: 625438
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through December 31, 2015

Previous Balance	\$ 159,154.54
Less Credits	-
Balance Forward	\$ 159,154.54
Total Fees	\$ 62,943.00
Total Costs	2,610.49
Total Amount Due This Invoice	\$ 65,553.49
TOTAL AMOUNT DUE	\$ 224,708.03

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 100 Broadway
Denver, CO 80203
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 625438

SA0061

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through March 31, 2016

TOTAL FEES \$ 118,205.00

COSTS

Research - Westlaw	\$ 587.43
Research - Lexis	200.34
Courier Costs	170.00
Delivery/Ground Transportation	55.00
Filing Fee	35.00
Mileage/Parking Expense	81.00
Recording Fee	40.00
Transcript Expense	1,502.96
Witness Fee	50.00
Telephone	16.09
Administrative Fee	2,955.13

Total Costs 5,692.95

Total Amount Due This Invoice **\$ 123,897.95**

SA0062

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through March 31, 2016

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/04/2016	K. Lenhard	Review order to show cause	0.20	595.00	\$ 119.00
01/04/2016	T. Peterson	Email exchange with T. Moody re upcoming hearing [.2]; draft communications to E. Ahern re [REDACTED] [.2]; review and analyze motion for order to show cause; draft communication to E. Ahern re [REDACTED] [.4]	0.80	545.00	436.00
01/04/2016	B. Reitz	Review trustee's motion for contempt and taking of deposition	0.10	295.00	29.50
01/05/2016	K. Lenhard	Conference with Texas counsel	0.30	595.00	178.50
01/05/2016	T. Peterson	Review documents to be provided to F. Waid, acknowledgment of same; review detailed voice mail message from Eleanor re [REDACTED] draft communication to K. Lenhard [.3]; review issues re [REDACTED] [.4]; telephone conference with J. Johnston and S. Clayton re authorization, cooperation, constitutional issues [.3]; confer with K. Lenhard re [REDACTED] [.2]; prepare for upcoming hearing [1.0]; review faxes from E. Ahern; review prior communications; draft communication to E. Ahern re [REDACTED] [.5]	2.70	545.00	1,471.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/06/2016	T. Peterson	Review multiple communications from E. Ahern re [REDACTED]; prepare for and attend hearing on motion for order to show cause on authorization and re deposition [2.5]; draft communication to E. Ahern re [REDACTED] [REDACTED]; review communication from L. Wakayama re [REDACTED]; draft communication to E. Ahern re [REDACTED] [2]; review communications from T. Moody and J. Powell re order [2]	3.40	545.00	1,853.00
01/06/2016	K. Lenhard	Court appearance order to show cause	1.50	595.00	892.50
01/07/2016	T. Peterson	Review proposed stipulation re extension of time to file brief; draft communication to J. Powell office re extension; review revised stipulation for execution [4]; review T. Moody email and proposed order; draft comments to proposed order [4]	0.80	545.00	436.00
01/11/2016	T. Peterson	Review communications from E. Ahern; draft communication to E. Ahern re [REDACTED] [3]; email exchange with T. Moody re proposed order [2]	0.50	545.00	272.50
01/12/2016	T. Peterson	Review comments from F. Waid re proposed order; draft communication to F. Waid and T. Moody re proposed order [4]; review detailed voice mail message from E. Ahern; review [REDACTED] [REDACTED]; coordinate with B. Reitz re [REDACTED] [3]; draft multiple communications to E. Ahern [2]; confer with K. Lenhard re [REDACTED] [1]; draft communication to E. Ahern re [REDACTED]	1.20	545.00	654.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████ [.2]			
01/12/2016	B. Reitz	Research basis for ██████████ ██████████	0.40	295.00	118.00
01/13/2016	T. Peterson	Email exchange with T. Moody re order as to deposition [.2]	0.20	545.00	109.00
01/18/2016	T. Peterson	Review detailed voice mail message from E. Ahern; draft communication to K. Lenhard [.2]	0.20	545.00	109.00
01/20/2016	T. Peterson	Review motion for stay and motion for reconsideration; email exchange with K. Lenhard re ██████████; confer with B. Reitz re ██████████ [.6]; review communication from L. Wakayama; draft multiple communications to E. Ahern [.2]	0.80	545.00	436.00
01/20/2016	B. Reitz	Review Sisters' motion for reconsideration	0.30	295.00	88.50
01/21/2016	K. Lenhard	Prepare for hearing	0.20	595.00	119.00
01/21/2016	T. Peterson	Review issues re ██████████ ██████████; strategize with K. Lenhard [.2]; draft communication to L. Wakayama re lack of information about proposal; draft communication to E. Ahern [.2]	0.40	545.00	218.00
01/23/2016	B. Reitz	Review motion for reconsideration; read original motion, oppositions, replies and supplements; read transcript of hearing on motion for distribution of fees; begin outlining opposition brief	2.30	295.00	678.50
01/25/2016	T. Peterson	Review three detailed voice mail messages from E. Ahern re ██████████ ██████████; email to K. Lenhard re ██████████; email	1.20	545.00	654.00

SA0065

FEEs

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		exchange with K. Lenhard; draft communication to E. Ahern re [REDACTED] [5]; strategize with B. Reitz re [REDACTED] [4]; review and revise proposed opposition to motion to stay [3]			
01/25/2016	B. Reitz	Analyze [REDACTED]; discuss [REDACTED]; draft opposition to motion to stay order; research case law and statutes [REDACTED]; begin drafting opposition to motion for reconsideration	5.70	295.00	1,681.50
01/26/2016	K. Lenhard	Prepare opposition for reconsideration; opposition to application for stay	0.30	595.00	178.50
01/26/2016	K. Lenhard	Prepare for hearing	0.40	595.00	238.00
01/26/2016	T. Peterson	Review and revise opposition to motion for reconsideration; review and revise opposition to motion to stay; finalize oppositions for filing [7]; review response filed by F. Waid; confer with K. Lenhard re [REDACTED] [4]; draft communications to E. Ahern re [REDACTED] [1]; review multiple communications from E. Ahern [REDACTED] [3]	1.50	545.00	817.50
01/26/2016	B. Reitz	Continue drafting opposition to motion for reconsideration; telephone conference with Nevada Legislative Records office re [REDACTED]; revise both oppositions with comments from T. Peterson; review trustee's response to motion	2.40	295.00	708.00
01/27/2016	K. Lenhard	Court appearance motion to reconsider, motion to compel	3.50	595.00	2,082.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/27/2016	K. Lenhard	Comments re [REDACTED]	0.20	595.00	119.00
01/27/2016	T. Peterson	Prepare for and attend hearing on motion for reconsideration, motion for stay, and motion to compel E. Ahern deposition [3.5]; review Supreme Court order re briefing schedule [.2]; confer with B. Reitz re [REDACTED]; review caselaw re [REDACTED] [.5]; draft communication to E. Ahern re [REDACTED]; draft multiple communications re [REDACTED] [.5]	4.70	545.00	2,561.50
01/27/2016	B. Reitz	Discuss strategy [REDACTED] work with N. Carlson to [REDACTED] preliminary review of treatises re [REDACTED]	0.80	295.00	236.00
01/28/2016	K. Lenhard	Conference with Trustee, Accountants	2.00	595.00	1,190.00
01/28/2016	K. Lenhard	Review tax email	0.20	595.00	119.00
01/28/2016	T. Peterson	Review documents [REDACTED] [4]; prepare for and attend conference with F. Waid, R. Geist, C. Wilcox, K. Lenhard [1.5]; confer with B. Reitz re [REDACTED] [.3]; review issues re [REDACTED] [.2]; draft communication to E. Ahern re [REDACTED] [.5]; analyze [REDACTED] draft communication to K. Lenhard re [REDACTED] [1.0]	3.90	545.00	2,125.50
01/29/2016	K. Lenhard	Conference with T. Peterson re [REDACTED]	0.20	595.00	119.00
01/29/2016	K. Lenhard	Review letter; conference with T. Peterson;	0.40	595.00	238.00

SA0067

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 6

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		email T. Peterson re [REDACTED]			
01/29/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
01/29/2016	T. Peterson	Review communication from F. Waid; telephone conference with K. Lenhard re [REDACTED]; [REDACTED] [3]; coordinate re [REDACTED]; [REDACTED] review fifth supplemental production from F. Waid [5]; review correspondence from Rushforth firm [2]; telephone conference with K. Lenhard re [REDACTED]; [REDACTED] [2]; coordinate with B. Reitz re [REDACTED]; [REDACTED] review issues re [REDACTED]; [REDACTED] multiple email exchanges with B. Reitz and K. Lenhard re [REDACTED] [5]	1.70	545.00	926.50
01/29/2016	B. Reitz	Review [REDACTED]	0.80	295.00	236.00
02/01/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
02/01/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
02/01/2016	K. Lenhard	Conference with F. Waid	0.30	595.00	178.50
02/01/2016	B. Reitz	Research case law re [REDACTED]; [REDACTED] draft Motion for Sanctions; email T. Peterson and K. Lenhard re [REDACTED]	2.70	295.00	796.50
02/01/2016	T. Peterson	Review communications from T. Moody; email to T. Moody re IME [2]; confer with K. Lenhard re [REDACTED] [2]; draft communication to E. Ahern re [REDACTED] [2]; review communication from B. Reitz re [REDACTED]; email to B. Reitz re [REDACTED]	1.50	545.00	817.50

SA0068

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 7

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		██████████ [2]; draft communication to E. Ahern re ██████████ [2]; draft communication to R. Geist re ██████████ [2]; telephone conference with F. Waid re potential settlement and outstanding issues [3]			
02/02/2016	K. Lenhard	Prepare for conference	0.20	595.00	119.00
02/02/2016	K. Lenhard	Prepare for conference	0.20	595.00	119.00
02/02/2016	B. Reitz	Discuss case strategy with T. Peterson following ██████████	0.10	295.00	29.50
02/02/2016	T. Peterson	Review voice mail from E. Ahern; draft communication to K. Lenhard; confer with K. Lenhard re ██████████ [3]; review Trustee filing re ██████████ [2]; draft communication to E. Ahern re ██████████ [2]; review ██████████; confer with B. Reitz re ██████████ [4]; review issues re ██████████; confer with K. Lenhard [4]; telephone conference with E. Ahern re ██████████ [3]; draft communication to E. Ahern re ██████████ [4]	2.20	545.00	1,199.00
02/03/2016	K. Lenhard	Conference with client; travel to and from Mesquite	5.00	595.00	2,975.00
02/03/2016	T. Peterson	Review issues in preparation for upcoming conference [4]; prepare for and travel to conference with E. Ahern; meet with E. Ahern and K. Lenhard [5.0]	5.40	545.00	2,943.00
02/04/2016	K. Lenhard	Prepare potential witness list	0.30	595.00	178.50



Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 9

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		statement; review arguments re [REDACTED] [REDACTED] email T. Peterson and K. Lenhard re [REDACTED]; review [REDACTED] [REDACTED] begin researching [REDACTED] [REDACTED]			
02/10/2016	T. Peterson	Email exchange with K. Lenhard re [REDACTED] [REDACTED] [2]; telephone conference with E. Ahern [3]; draft communication to F. Waid and T. Moody re information as to document requests and IME; review T. Moody response [3]; confer with K. Lenhard re [REDACTED] [2]; review response from F. Waid re document requests and IME [2]; telephone conference (2x) with J. Johnston re Nevada court order, oil and gas severance taxes [5]; review notice of appeal and case appeal statement; email exchange with B. Reitz re [REDACTED] [REDACTED] [4]; draft communications to E. Ahern re [REDACTED] [2]; draft communication to B. Reitz re [REDACTED] [REDACTED] [2]	2.50	545.00	1,362.50
02/11/2016	K. Lenhard	Prepare for trial	1.50	595.00	892.50
02/11/2016	K. Lenhard	Review fourth appeal	0.30	595.00	178.50
02/11/2016	K. Lenhard	Prepare for trial; review [REDACTED]	0.80	595.00	476.00
02/11/2016	B. Reitz	Continue researching [REDACTED]; draft memorandum to T. Peterson and K. Lenhard re [REDACTED] prepare evidence re [REDACTED] [REDACTED] research [REDACTED] review Sisters' motion to stay at Nevada Supreme Court	4.60	295.00	1,357.00

SA0071

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 10

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/11/2016	T. Peterson	Telephone conference with F. Waid re potential conference, backup information [.2]; strategize with K. Lenhard re [REDACTED] [4]; coordinate with B. Reitz re [REDACTED] [.2]; telephone conference with E. Ahern re [REDACTED] [.3]; email exchange with F. Waid confirming conference [.2]; review daughters' motion for stay in Supreme Court, motion for extension of page limits [1.0]; telephone conference with M. Oliver re [REDACTED] [.2]; draft status memorandum to client re [REDACTED] multiple communications to E. Ahern re [REDACTED] [.7]; draft communication to R. Geist re [REDACTED] [2]; draft communication to J. Powell re service of subpoena [.2]; telephone conference with F. Waid; he just read appeal from J. Powell [.4]; draft communication to K. Lenhard re [REDACTED] [.2]	4.20	545.00	2,289.00
02/12/2016	B. Reitz	Begin outlining Response to Motion to Stay at Nevada Supreme Court	0.90	295.00	265.50
02/12/2016	K. Lenhard	Travel to Mesquite; conference with F. Waid and E. Ahern; review summary F. Waid telephone conference	5.20	595.00	3,094.00
02/12/2016	K. Lenhard	Prepare trial brief; email client	0.30	595.00	178.50
02/12/2016	K. Lenhard	Prepare opposition to motion to stay	0.30	595.00	178.50
02/12/2016	T. Peterson	Email exchange with K. Lenhard re [REDACTED]	2.70	545.00	1,471.50



<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		[REDACTED] email exchange with B. Reitz re [REDACTED] [.3]; telephone conference with K. Lenhard [.2]; multiple email exchanges with E. Ahern, K. Lenhard, re [REDACTED] [.6]; review Apache documents provided by F. Waid, compare [REDACTED] [REDACTED] [8]; review communications from F. Waid re IME; email exchange with F. Waid re IME; review communication from J. Powell re [REDACTED] [.3]; draft comments re [REDACTED] [.5]			
02/13/2016	B. Reitz	Work on response to Sisters' motion to stay in supreme court; research [REDACTED] email K. Lenhard and T. Peterson re [REDACTED]	5.10	295.00	1,504.50
02/13/2016	K. Lenhard	Prepare for trial	0.40	595.00	238.00
02/14/2016	B. Reitz	Continue drafting response to motion to stay in Supreme Court	1.80	295.00	531.00
02/15/2016	T. Peterson	Review draft opposition of motion to stay appeal; review order instructing trustee; emails from K. Lenhard and B. Reitz; draft communication to B. Reitz re [REDACTED] [.5]	0.50	545.00	272.50
02/16/2016	K. Lenhard	Prepare for trial; review transcripts; email counsel re computations	1.00	595.00	595.00
02/16/2016	K. Lenhard	Debrief re [REDACTED] E	0.20	595.00	119.00
02/16/2016	K. Lenhard	Conference with S. King; prepare for trial	1.00	595.00	595.00
02/16/2016	K. Lenhard	Conference with F. Waid	0.30	595.00	178.50
02/16/2016	K. Lenhard	Prepare for trial; prepare opposition to stay	0.50	595.00	297.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 12

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		application			
02/16/2016	K. Lenhard	Email counsel	0.20	595.00	119.00
02/16/2016	L. Huntley	Examine [REDACTED]; prepare trial subpoenas to J. Montoya and K. Bouvier and acceptances of service for same and outline issues re same	0.50	260.00	130.00
02/16/2016	T. Peterson	Review communication from K. Lenhard; confer with K. Lenhard re [REDACTED] [3]; travel to, prepare for and attend independent medical examination [4.0]; telephone conference with S. King re upcoming hearing [1.5]; strategize with B. Reitz and K. Lenhard re [REDACTED] [3]; email exchange with T. Moody re IME report [1.2]; telephone conference with F. Waid re upcoming hearing [1.2]	5.50	545.00	2,997.50
02/16/2016	B. Reitz	Continue drafting response to emergency motion to stay in supreme court; discuss [REDACTED] with T. Peterson and K. Lenhard; review and revise draft	5.90	295.00	1,740.50
02/17/2016	L. Huntley	Research file and retrieve Trustee's Interim Report for preparation for evidentiary hearing	0.10	260.00	26.00
02/17/2016	L. Huntley	Research [REDACTED]; request witness fee check requests for service with trial subpoenas	0.40	260.00	104.00
02/17/2016	K. Lenhard	Review attachments	0.30	595.00	178.50
02/17/2016	K. Lenhard	Prepare trial brief	0.20	595.00	119.00
02/17/2016	K. Lenhard	Prepare for trial, comparison interim report,	0.30	595.00	178.50

SA0074

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001
Page 13

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		King draft			
02/17/2016	K. Lenhard	Prepare Trial Memorandum	0.80	595.00	476.00
02/17/2016	T. Peterson	Review and analyze schedules from S. King; emails from S. King and K. Lenhard [.3]; multiple email exchanges with E. Ahern re [REDACTED] [.4]; confer with K. Lenhard re [REDACTED] [.2]; strategize with K. Lenhard and B. Reitz re [REDACTED] [.7]; review pretrial memorandum filed by J. Powell [.7]; review and revise proposed response to emergency motion to stay [.4]	2.70	545.00	1,471.50
02/17/2016	B. Reitz	Review Sisters' pre-trial memorandum; discuss [REDACTED] with K. Lenhard and T. Peterson; begin drafting trial brief	4.20	295.00	1,239.00
02/18/2016	L. Huntley	Finalize trial subpoenas, witness fee checks, and coordinate service of same; telephone conference with Rushforth Firm re confirmation of new physical address for service; correspondence from process server re confirmation of service	0.50	260.00	130.00
02/18/2016	T. Peterson	Multiple emails from E. Ahern re [REDACTED] [.3]; confer with K. Lenhard re [REDACTED] [REDACTED], finalize brief and cut sections for filing within page limits [.5]; review and revise subpoenas and acceptance of service for daughters attendance at hearing [.3]; telephone conference with F. Waid [.2]; review communication from S. King [.2]; telephone conference with S. King re summaries [.8]; draft communication to S. King re [REDACTED] [REDACTED] [.2]; draft communication re	4.90	545.00	2,670.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 14

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		<p>██████████ [2]; telephone conference with F. Waid re Apache access [3]; prepare for and meet with E. Ahern re ██████████ [1.0]; confer with B. Reitz re ██████████ review amicus curiae request; draft communication to E. Ahern re ██████████ [4]; review initial draft of trial memorandum; email exchange with B. Reitz [5]</p>			
02/18/2016	K. Lenhard	Conference with S. King; prepare for trial	1.00	595.00	595.00
02/18/2016	K. Lenhard	Conference with clients	0.80	595.00	476.00
02/18/2016	K. Lenhard	Prepare trial brief	0.30	595.00	178.50
02/18/2016	B. Reitz	Continue drafting Trial Memorandum; review ██████████ review and compile exhibits for evidentiary hearing; discuss arguments with K. Lenhard and T. Peterson	10.40	295.00	3,068.00
02/19/2016	T. Peterson	Work on trial memorandum; review and revise trial memorandum [8]; review S. King ██████████ [2]; prepare for and participate in telephone conference with S. King, K. Lenhard, and E. Ahern re ██████████ [5]; telephone conference with K. Lenhard [3]; review and finalize trial memorandum; coordinate re filing under seal [8]; telephone conference with F. Waid and T. Moody re F. Brown amicus filing and re IME [2]; review issues re ██████████ [2]; review transcript re order; draft communication to J. Powell re modifications to order based upon transcript [4]; review motion to seal for filing [2]; review apache records; draft memorandum re same [8];	5.40	545.00	2,943.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 15

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		telephone conference with K. Lenhard re [REDACTED] [REDACTED] [1.0]			
02/19/2016	L. Huntley	Receipt of original trial subpoenas and acceptance of service for K. Bouvier and J. Montoya and coordinate filing and service of same	0.10	260.00	26.00
02/19/2016	K. Lenhard	Trial preparation; conference with S. King, and client; review exhibits; review F. Waid report; trial memorandum; review Montoya deposition transcript; review letter	2.20	595.00	1,309.00
02/19/2016	K. Lenhard	Prepare F. Waid, J. Montoya testimony	0.50	595.00	297.50
02/19/2016	K. Lenhard	Trial preparation; [REDACTED]	1.00	595.00	595.00
02/19/2016	B. Reitz	Review and revise Trial Memorandum; revise further with comments from K. Lenhard and T. Peterson; compile exhibits to Trial Memorandum; review Motion to file under Seal; file same; draft Ex Parte Application and Order to File Under Seal; telephone conference with clerk re Application	4.90	295.00	1,445.50
02/19/2016	M. Turner	Assist with trial brief exhibits	1.00	175.00	175.00
02/20/2016	K. Lenhard	Prepare for trial, opening; review briefs; review depositions	1.00	595.00	595.00
02/21/2016	K. Lenhard	Prepare for Trial	1.20	595.00	714.00
02/21/2016	T. Peterson	Review K. Lenhard email; review [REDACTED] [2]	0.20	545.00	109.00
02/22/2016	K. Lenhard	Day 1 of Trial	9.00	595.00	5,355.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 16

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/22/2016	T. Peterson	Review communications from E. Ahern [.2]; confer with K. Lenhard re [REDACTED] [REDACTED] [.6]; telephone conference (2x) with E. Ahern [.2]; meet with client; prepare for and participate in evidentiary hearing on no-contest clause [8.0]	9.00	\$45.00	4,905.00
02/23/2016	T. Peterson	Review issues re [REDACTED] confer with B. Reitz re [REDACTED] [REDACTED] [.3]; telephone conference with F. Waid re tax issues, IRS lien issues, desire to speak to E. Ahern personal accountant [.2]; draft communication to E. Ahern re [REDACTED] [.2]	0.70	\$45.00	381.50
02/23/2016	B. Reitz	Debrief evidentiary hearing and discuss [REDACTED] with T. Peterson	0.20	295.00	59.00
02/24/2016	K. Lenhard	Review [REDACTED]	0.20	\$95.00	119.00
02/24/2016	K. Lenhard	Conference with F. Waid	0.60	\$95.00	357.00
02/24/2016	K. Lenhard	Review [REDACTED]	0.20	\$95.00	119.00
02/24/2016	T. Peterson	Review communications from E. Ahern; review voice mail from Dr. Jeppson's office; draft multiple communications to E. Ahern [.4]; telephone conference with F. Waid re issue with payment to J. Shapiro, tax issues, and effect upon trust [.6]; review independent medical examination; draft communication to T. Moody re submission to court [.4]; review communication from R. Geist; review and analyze petition for instructions [.4]; review and analyze respondent's answering brief, in	2.60	\$45.00	1,417.00

SA0078

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001
Page 17

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		preparation for filing reply brief in Supreme Court [.8]			
02/25/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
02/25/2016	T. Peterson	Email exchange with T. Moody re submission of IME in camera to court; coordinate re submission; review and revise correspondence and submission of IME report [.5]; review communication re stipulation to file trustee petition under seal; review stipulation for execution [.2]; email from E. Ahern re [REDACTED] emails to E. Ahern re [REDACTED] [REDACTED] [.3]	1.00	545.00	545.00
02/25/2016	B. Reitz	Begin reviewing Response to Opening Appellate Brief	0.40	295.00	118.00
02/26/2016	T. Peterson	Telephone conference with F. Waid re potential offer to resolve matter [.2]; confer with K. Lenhard [.2]; draft communication to F. Waid re offer in writing [.2]; draft multiple communications to E. Ahern [.2]; review fax from court re ex parte motion; multiple email exchanges with B. Reitz and K. Lenhard re [REDACTED] [.2]; review multiple email exchanges with E. Ahern and K. Lenhard re [REDACTED] [REDACTED]; confer with K. Lenhard [.4]	1.40	545.00	763.00
02/26/2016	K. Lenhard	Review Trustee's proposal	0.20	595.00	119.00
02/26/2016	B. Reitz	Draft Motion to Submit Documents in Camera on Order Shortening Time; email K. Lenhard and T. Peterson re [REDACTED]	1.20	295.00	354.00
02/29/2016	T. Peterson	Review communication from J. Powell; draft	2.70	545.00	1,471.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 18

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		communication to K. Lenhard; email to J. Powell [.2]; review and analyze [REDACTED] [REDACTED] [.3]; draft multiple communications to E. Ahern re [REDACTED] [REDACTED] [.2]; multiple communications from E. Ahern re [REDACTED] [.3]; prepare for and participate in telephone conference with S. King, E. Ahern, and K. Lenhard [.5]; draft communication to S. King re [REDACTED] [REDACTED] [1]; draft communication to F. Waid re tax issues [.1]; email exchange with B. Reitz re [REDACTED] [REDACTED] telephone conference with K. Lenhard [.2]; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED] Ahern, and re tax issues and letters from McNair [.6]; review communications from F. Waid re tax issues and settlement proposal [.2]			
02/29/2016	K. Lenhard	Response to proposal	0.20	595.00	119.00
02/29/2016	B. Reitz	Review respondent's brief; email K. Lenhard and T. Peterson re [REDACTED] begin outlining reply brief	2.90	295.00	855.50
03/01/2016	K. Lenhard	Prepare for telephone conferences; review emails re [REDACTED]	0.30	595.00	178.50
03/01/2016	K. Lenhard	Conference with client	0.30	595.00	178.50
03/01/2016	K. Lenhard	Conference with accountants	0.50	595.00	297.50
03/01/2016	T. Peterson	Analyze communication from S. King re [REDACTED] [REDACTED] [REDACTED]; draft	3.00	545.00	1,635.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 19

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		communication to S. King re [REDACTED] [.4]; confer with B. Reitz re [REDACTED] [REDACTED] [.2]; multiple communications from E. Ahern re [REDACTED] [REDACTED] [.5]; draft communication to E. Ahern re [REDACTED] [REDACTED] [.2]; draft communication to F. Waid re conference between S. King and C. Wilcox; emails re [REDACTED] [.3]; review and finalize motion for in camera submission [.2]; telephone conferences with E. Ahern and K. Lenhard; [REDACTED] [REDACTED] [.4]; prepare for and participate in telephone conferences with S. King, C. Wilcox, F. Waid, E. Ahern, and K. Lenhard re [REDACTED] [REDACTED] [.7]; email re order to file petition for allocation under seal [.1]			
03/01/2016	B. Reitz	Draft affidavit of T. Peterson in support of motion to submit documents in camera; finalize motion; discuss [REDACTED] with T. Peterson	2.20	295.00	649.00
03/02/2016	K. Lenhard	Prepare closing argument	1.20	595.00	714.00
03/02/2016	K. Lenhard	Telephone conference with T. Moody	0.20	595.00	119.00
03/02/2016	T. Peterson	Review communication from E. Ahern re [REDACTED] [.2]; confer with K. Lenhard re [REDACTED], confer with B. Reitz re [REDACTED] [.4]; draft multiple communications to E. Ahern re [REDACTED] [.4]; review and revise response to petition for instructions [.6]; review F. Waid email re trust payment and tax allocation; multiple email exchanges with E. Ahern re [REDACTED] [REDACTED]; review multiple emails	3.10	545.00	1,689.50

SA0081

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 20

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		from E. Ahern re [REDACTED] [.6]; review Powell opposition to motion for in camera review [.2]; confer with K. Lenhard re [REDACTED] [.5]; telephone conferences with T. Moody re hearing [.2]			
03/02/2016	B. Reitz	Review Trustee's Petition for Instructions; discuss [REDACTED] T. Peterson and K. Lenhard; draft ex parte motion to file response to petition under seal; draft response to petition for instructions; revise draft of Response with comments from T. Peterson; draft cover letter to Judge Sturman re documents filed under seal; review opposition to motion to file under seal	2.90	295.00	855.50
03/03/2016	T. Peterson	Prepare for and attend hearing on various motions and conclusion of evidentiary hearing [4.5]; confer with B. Reitz re [REDACTED] [.2]	4.70	545.00	2,561.50
03/03/2016	K. Lenhard	Day 2 Trial	4.50	595.00	2,677.50
03/03/2016	B. Reitz	Debrief [REDACTED] with T. Peterson; strategize re [REDACTED]	0.60	295.00	177.00
03/04/2016	T. Peterson	Confer with K. Lenhard re [REDACTED] [.2]; review and revise proposed order on motion re [REDACTED] [.2]	0.40	545.00	218.00
03/04/2016	B. Reitz	Draft Order Granting Motion to Submit Documents In Camera; email opposing counsel re same	0.90	295.00	265.50
03/05/2016	T. Peterson	Review and respond to multiple communications from E. Ahern re [REDACTED] [.4]	0.40	545.00	218.00

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 21

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/07/2016	B. Reitz	Email opposing counsel re stipulation	0.10	295.00	29.50
03/07/2016	T. Peterson	Email from E. Ahern; confer with K. Lenhard re [REDACTED] [2]	0.20	545.00	109.00
03/08/2016	K. Lenhard	Email client	0.30	595.00	178.50
03/08/2016	T. Peterson	Review communication from E. Ahern; review K. Lenhard response; draft communication to E. Ahern re [REDACTED] [2]	0.20	545.00	109.00
03/09/2016	B. Reitz	Email T. Peterson and K. Lenhard re [REDACTED] [REDACTED]	0.20	295.00	59.00
03/09/2016	B. Reitz	Work on reply brief to Nevada Supreme Court	3.20	295.00	944.00
03/09/2016	T. Peterson	Email exchange with B. Reitz and K. Lenhard re [REDACTED] [2]	0.20	545.00	109.00
03/10/2016	B. Reitz	Research case law for arguments re [REDACTED] [REDACTED]; continue drafting Reply in support of appeal	6.10	295.00	1,799.50
03/13/2016	B. Reitz	Review counterclaims of Eleanor Ahern and evaluate Sisters' arguments re [REDACTED] continue drafting and revising reply brief to Supreme Court; email K. Lenhard and T. Peterson re draft of reply brief	2.10	295.00	619.50
03/15/2016	T. Peterson	Prepare notice of entry of order; confirm re [REDACTED] [REDACTED] [REDACTED] [3]; draft communication to R. Geist and T. Moody re order from evidentiary hearing [2]; draft communication to E. Ahern [2]	0.70	545.00	381.50

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001
Page 22

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/15/2016	B. Reitz	Draft Supplement to Trial Memorandum pursuant to Court's Order dated March 14, 2016	0.40	295.00	118.00
03/16/2016	T. Peterson	Review and analyze proposed reply brief; work on issues re [REDACTED]; work on issues re [REDACTED] [1.5]; confer with B. Reitz re [REDACTED] [1.0]	2.50	545.00	1,362.50
03/16/2016	B. Reitz	Discuss arguments for Reply brief with T. Peterson	1.00	295.00	295.00
03/17/2016	T. Peterson	Email exchange re [REDACTED]; confer with K. Lenhard re [REDACTED] [2]; review filings re [REDACTED]; draft communications to E. Ahern [3]	0.50	545.00	272.50
03/17/2016	B. Reitz	Revise submission of Page 6 of Independent Medical Examination to be Filed under Seal; begin researching [REDACTED]	0.60	295.00	177.00
03/18/2016	T. Peterson	Review multiple communications from E. Ahern; draft communication to E. Ahern [3]; draft communication to J. Powell re extension of time on reply brief [2]	0.50	545.00	272.50
03/19/2016	T. Peterson	Review communication from E. Ahern re S. [REDACTED] [2]; email exchange with E. Ahern re [REDACTED] [2]	0.40	545.00	218.00
03/21/2016	T. Peterson	Telephone conferences with opposing counsel re potential extension of time; coordinate with B. Reitz re [REDACTED]; review and revise proposed stipulation [4]; email exchange with K. Esparza re [REDACTED] [2]; multiple emails from E. Ahern [2]	0.80	545.00	436.00

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 23

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/21/2016	B. Reitz	Draft Stipulation for Extension of Time to File Reply Brief; research case law re [REDACTED]; continue drafting and revising Reply brief to Supreme Court; scrutinize [REDACTED]	4.90	295.00	1,445.50
03/22/2016	T. Peterson	Review communication from T. Moody; review proposed order for execution; email to T. Moody [.2]; telephone conferences with T. Moody re [REDACTED]; draft communication to E. Ahern re [REDACTED] [.2]	0.60	545.00	327.00
03/22/2016	B. Reitz	Continue drafting and revising Reply Brief	1.50	295.00	442.50
03/23/2016	T. Peterson	Telephone conferences with F. Waid and T. Moody re deposition and re Mann case [.4]; draft communication to E. Ahern re [REDACTED] [.2]	0.60	545.00	327.00
03/23/2016	B. Reitz	Research re [REDACTED]; further revise reply brief; email T. Peterson re [REDACTED]	3.20	295.00	944.00
03/24/2016	T. Peterson	Confer with K. Lenhard re [REDACTED] [.3]; review and analyze revisions to reply brief in support of appeal; work on [REDACTED] [.2]	1.50	545.00	817.50
03/26/2016	K. Lenhard	Review and edit reply brief	0.60	595.00	357.00
03/28/2016	T. Peterson	Review communication from K. Esperza re [REDACTED] [.2]	0.20	545.00	109.00
03/29/2016	K. Lenhard	Email counsel Trustee	0.20	595.00	119.00

SA0085

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client Matter #: 018177.0001
Page 24

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/29/2016	K. Lenhard	Email client	0.20	595.00	119.00
03/29/2016	B. Reitz	Review draft of Reply brief with T. Peterson; email client re [REDACTED]	0.40	295.00	118.00
03/29/2016	T. Peterson	Review order on stipulation; review order re no transcripts; email to E. Ahern [.2]; work on reply brief; confer with B. Reitz [.4]	0.60	545.00	327.00
03/31/2016	T. Peterson	Review [REDACTED] [REDACTED] review court order; draft multiple communications to E. Ahern [.3]	0.30	545.00	163.50
Total Fees			254.80		\$ 118,205.00

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	57.80	595.00	\$ 34,391.00
Tamara (Tammy) Beatty Peterson	103.50	545.00	56,407.50
Benjamin K. Reitz	90.90	295.00	26,815.50
Lorelei D. Huntley	1.60	260.00	416.00
Monica L. Turner	1.00	175.00	175.00
Total Fees	254.80		\$ 118,205.00

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/31/2015	Courier Costs - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Signed Docs	\$ 10.00

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date:
Invoice #:
Client/Matter #:

April 30, 2016
636790
018177.0001
Page 25

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/22/2015	Courier Costs - Nationwide Legal Nevada, LLC - Hutchison & Steffen, LLC - Signed by: B. Neeley	20.00
09/23/2015	Courier Costs - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Signed Docs	10.00
09/25/2015	Courier Costs - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Delivered Checks/Recap	10.00
10/13/2015	Courier Costs - Nationwide Legal Nevada, LLC - Clark County District Court - Signed By: Delivered CC	15.00
10/26/2015	Courier Costs - Nationwide Legal Nevada, LLC - Hutchinson and Steffen, LLC - Signed by: B. Neely	15.00
10/27/2015	Courier Costs - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Delivered Docs	5.00
11/03/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Delivered Docs	15.00
11/03/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Delivered Docs	25.00
11/13/2015	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Hutchinson & Steffen, LLC - Signed by: Liz R.	15.00
11/17/2015	Courier Costs - Nationwide Legal, Inc. - Clark County District Court - Signed By: Delivered	25.00
11/30/2015	Courier Costs - Nationwide Legal, Inc. - Hutchison & Steffen, LLC - Signed by: B. Neeley	15.00
01/05/2016	Courier Costs - Nationwide Legal, Inc. - Hutchinson & Steffen, LLC - Signed By: B. Neeley	15.00
01/06/2016	Mileage/Parking Expense - Cash - Parking at Courthouse	10.00
01/25/2016	Research - Lexis - BKR - 1884	11.48
01/25/2016	Research - Lexis - BKR - 1884	19.97
01/26/2016	Courier Costs - Nationwide Legal, Inc. - Clark County District Court - Signed By: Called Chambers	25.00
01/26/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
01/26/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
01/27/2016	Research - Westlaw - BKR-1884	141.09
01/29/2016	Research - Lexis - BKR - 1884	3.83
01/29/2016	Research - Lexis - BKR - 1884	19.96
02/01/2016	Research - Lexis - BKR - 1884	20.20
02/02/2016	Courier Costs - Nationwide Legal, Inc. - Clark County District Court - Signed By: Delivered	5.00
02/02/2016	Transcript Expense - Treasurer, Clark County - Trust Dispute	40.00

Brownstein Hyatt Farber Schreck

Fluanna Ahern
Re: The W. N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001
Page 26

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/02/2016	Transcript Expense - Kristen Lunkwitz - Trust Dispute	53.20
02/07/2016	Witness Fee - Kathryn A. Bouvier - Lay Witness Fee For Trial	25.00
02/07/2016	Witness Fee - Jacqueline M. Montoya - Lay Witness Fee For Trial	25.00
02/13/2016	Research - Westlaw - BKR-1884	242.00
02/16/2016	Telephone - Global Crossing Conferencing - Conference Call	4.91
02/17/2016	Research - Lexis - BKR - 1884	6.73
02/18/2016	Research - Westlaw - BKR-1884	148.78
02/18/2016	Research - Lexis - BKR - 1884	74.07
02/18/2016	Mileage/Parking Expense - Parkway Center, LLC - Dates Incurred 2/18 and 2/22/16	59.00
02/19/2016	Research - Westlaw - BKR-1884	55.86
02/19/2016	Research - Lexis - BKR - 1884	13.46
02/19/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
02/19/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
02/19/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
02/19/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
02/19/2016	Telephone - Global Crossing Conferencing - Conference call	2.95
02/22/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
02/29/2016	Telephone - Global Crossing Conferencing - Conference Call	2.54
03/01/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
03/01/2016	Telephone - Global Crossing Conferencing - Conference Call	5.69
03/02/2016	Mileage/Parking Expense - Cash - Parking	14.00
03/09/2016	Recording Fee - Treasurer, Clark County - Recording Fee	40.00
03/09/2016	Transcript Expense - Kristen Lunkwitz - Court Reporter	348.96
03/11/2016	Research - Lexis - BKR - 1884	21.89
03/14/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
03/15/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
03/21/2016	Research - Lexis - BKR - 1884	8.75
03/28/2016	Transcript Expense - Karr Reporting, Inc. - Karr Reporting, Inc. - Trust Dispute	820.80
03/28/2016	Transcript Expense - Treasurer, Clark County - Treasurer, Clark County - Trust Dispute	240.00
04/30/2016	Administrative Fee for Services Through March 31, 2016	2,955.13
	Total Costs	\$ 5,692.95

SA0088

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 27

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Courier Costs	\$ 170.00
Delivery/Ground Transportation	55.00
Filing Fee	35.00
Mileage/Parking Expense	81.00
Recording Fee	40.00
Research - Lexis	200.34
Research - Westlaw	587.43
Telephone	16.09
Transcript Expense	1,502.96
Witness Fee	50.00
Administrative Fee	2,955.13
	<hr/>
	\$ 5,692.95

Total Amount Due This Invoice	<hr/> \$ 123,897.95
Previous Balance	\$ 224,708.03
Less Credits	(70,000.00)
TOTAL AMOUNT DUE	<hr/> \$ 278,605.98 <hr/>

SA0089

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: April 30, 2016
Invoice #: 636790
Client.Matter #: 018177.0001
Page 28

AR AGING

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121+</u>	<u>Total</u>
\$ -	\$ -	\$ -	\$ 100,111.33	\$ 54,596.70	\$ 154,708.03

SUMMARY OF ACCOUNTS RECEIVABLE

<u>Date</u>	<u>Invoice No.</u>	<u>Amount</u>	<u>Credits</u>	<u>Adjustments</u>	<u>Balance</u>
09/23/2015	615194	\$ 46,043.10	\$(11,920.69)	\$ -	\$ 34,122.41
10/09/2015	616822	20,474.29	-	-	20,474.29
11/23/2015	621331	34,557.84	-	-	34,557.84
01/08/2016	625438	65,553.49	-	-	65,553.49
		<u>\$ 166,628.72</u>	<u>\$(11,920.69)</u>	<u>\$ -</u>	<u>\$ 154,708.03</u>



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8131
http://www.bhfs.com
EIN: 26-1367866

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: April 30, 2016
Invoice #: 636790
Client/Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through March 31, 2016

Previous Balance	\$ 224,708.03
Less Credits	(70,000.00)
Balance Forward	\$ 154,708.03
Total Fees	\$ 118,205.00
Total Costs	5,692.95
Total Amount Due This Invoice	\$ 123,897.95
TOTAL AMOUNT DUE	\$ 278,605.98

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only.
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL.

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6021
11030 Circle Drive Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 1675 Broadway
Denver, CO 80202
ABA#: 307070267
Account #: 769681047123
Ref: 018177.0001, Invoice No. 636790



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: July 26, 2016
Invoice #: 645568
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through June 30, 2016

TOTAL FEES \$ 16,869.50

COSTS

Delivery/Ground Transportation	\$ 248.00
Filing Fee	3.50
Mileage/Parking Expense	30.00
Transcript Expense	22.50
Administrative Fee	421.74

Total Costs 725.74

Total Amount Due This Invoice \$ 17,595.24

SA0092

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: July 26, 2016
Invoice #: 645568
Client Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through June 30, 2016

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/01/2016	B. Reitz	Begin editing Reply brief prior to filing	0.20	295.00	\$ 59.00
04/01/2016	T. Peterson	Review multiple communications from E. Ahern re [REDACTED]; review [REDACTED]; draft communication to E. Ahern [4]	0.40	545.00	218.00
04/04/2016	K. Lenhard	Review final draft reply	0.40	595.00	238.00
04/04/2016	T. Peterson	Review and finalize reply brief on appeal [1.5]; confer with K. Lenhard re [REDACTED]; draft communication to T. Moody; draft communication to J. Powell [5]; review P. Waid supplemental disclosure; [REDACTED] [4]; review R. Geist proposed order re 65 day rule; email to K. Lenhard [3]; emails to E. Ahern [2]	2.90	545.00	1,580.50
04/04/2016	B. Reitz	Revise Reply Brief with comments from T. Peterson; discuss additional revisions with T. Peterson; continue revising brief in preparation for filing; verify citations	3.30	295.00	973.50
04/05/2016	K. Lenhard	Telephone conference with T. Moody	0.20	595.00	119.00
04/05/2016	T. Peterson	Confer with K. Lenhard re [REDACTED]; [REDACTED] [2]; draft communication to J. Powell	0.60	545.00	327.00

SA0093

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client/Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		and L. Rushforth re proposed order as to no contest clause [.2]; review communication from E. Ahern re [REDACTED] [REDACTED] [REDACTED] draft communication to E. Ahern re [REDACTED] [REDACTED] [.2]			
04/05/2016	B. Reitz	Revise reply brief pursuant to Supreme Court instruction; refile same	0.20	295.00	59.00
04/06/2016	T. Peterson	Review communication from F. Waid; draft communication to E. Ahern re [REDACTED] [.2]; review proposed order from J. Powell [.3]	0.50	545.00	272.50
04/07/2016	T. Peterson	Review multiple communications from E. Ahern re [REDACTED] [.2]	0.20	545.00	109.00
04/09/2016	T. Peterson	Analyze [REDACTED]; draft communication to K. Lenhard re [REDACTED] [REDACTED] [.4]	0.40	545.00	218.00
04/14/2016	K. Lenhard	Review citation	0.30	595.00	178.50
04/14/2016	T. Peterson	Review motion for citation filed by F. Waid; draft communication to E. Ahern [.3]	0.30	545.00	163.50
04/15/2016	T. Peterson	Review order from Supreme Court re motion to stay [.2]; email exchange with F. Waid re living expenses; revenue [.2]; draft communications to E. Ahern re [REDACTED] [.1]	0.50	545.00	272.50
04/15/2016	B. Reitz	Review Supreme Court order on motion for stay	0.10	295.00	29.50
04/15/2016	K. Lenhard	Review Supreme Court Order; email counsel; review 1st quarter accountings	0.50	595.00	297.50

SA0094

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2016	B. Reitz	Discuss proposed order on February 22 hearing with T. Peterson; review transcript of hearing; draft competing order; draft letter to Judge Sturman re basis for competing order	3.90	295.00	1,150.50
04/18/2016	T. Peterson	Review first quarter revenue report for trust from F. Waid; draft communication to E. Ahern [.2]; review and analyze [REDACTED] coordinate with B. Reitz re [REDACTED] [1.0]; draft communication to J. Powell re order [.2]; confer with K. Lenhard re [REDACTED] [.2]; review and revise proposed correspondence to court [.2]; review and revise proposed competing order to send to court [.2]	2.00	545.00	1,090.00
04/19/2016	K. Lenhard	Email counsel re expedited setting	0.20	595.00	119.00
04/19/2016	K. Lenhard	Review correspondence to court	0.20	595.00	119.00
04/19/2016	B. Reitz	Finalize and serve competing order and cover letter re March 2, 2016 hearing	0.30	295.00	88.50
04/19/2016	T. Peterson	Review transcript of March 3 hearing re [REDACTED] [REDACTED]; draft communication to R. Geist re order [.5]; draft communication to F. Waid and T. Moody re living expenses [.2]; review and finalize correspondence to court, proposed order, for submission [.2]; draft communications to E. Ahern re [REDACTED] [.2]	1.10	545.00	599.50
04/20/2016	K. Lenhard	Review Trustee claims, medical	0.20	595.00	119.00
04/20/2016	B. Reitz	Research expedited appellate review for elderly appellants	0.40	295.00	118.00

SA0095

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client Matter #: 018177.0001
Page 4

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/20/2016	T. Peterson	Review communication from T. Moody re needs and resource analysis; review communication from F. Waid re medical related items, prescription, issues re living expenses [.2]	0.20	545.00	109.00
04/21/2016	T. Peterson	Draft communication to E. Ahern re [REDACTED] [REDACTED]; review correspondence from J. Powell to court re proposed order; draft communication to E. Ahern [.3]	0.50	545.00	272.50
04/21/2016	K. Lenhard	Emails re expenses	0.20	595.00	119.00
04/21/2016	K. Lenhard	Review orders	0.20	595.00	119.00
04/27/2016	T. Peterson	Email exchange with B. Reitz and K. Lenhard re [REDACTED] [REDACTED] [.2]; review email from J. Powell re appeal, [REDACTED] email exchange with K. Lenhard and B. Reitz; draft communication to E. Ahern re [REDACTED] email to J. Powell [.4]	0.60	545.00	327.00
04/27/2016	B. Reitz	Review request for stipulated dismissal of appeal	0.10	295.00	29.50
04/29/2016	T. Peterson	Review communication from T. Moody; draft communication to E. Ahern re [REDACTED] [.2]; review and analyze [REDACTED] [.2]	0.40	545.00	218.00
04/29/2016	B. Reitz	Draft response to motion for citation; review; email T. Peterson and K. Lenhard re [REDACTED]	1.30	295.00	383.50
05/02/2016	B. Reitz	Review and revise response to motion for citation; prepare for filing	0.20	295.00	59.00

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client Matter #: 018177.0001
Page 5

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/02/2016	T. Peterson	Review communication from D. Kiefer re stipulation; telephone conference with D. Kiefer re proposed stipulation as to appeal; draft communication to E. Ahern re [REDACTED] [REDACTED] [3]; review order from Nevada Supreme Court re [REDACTED]; draft communication to E. Ahern [2]; email from E. Ahern re [REDACTED]; draft communication to E. Ahern; draft communication to E. Ahern re [REDACTED] [2]	0.70	545.00	381.50
05/03/2016	T. Peterson	Email exchange with E. Ahern re [REDACTED] [REDACTED] [2]	0.20	545.00	109.00
05/06/2016	T. Peterson	Review multiple communications from E. Ahern re [REDACTED] [4]; review communication from R. Geist, revised order, draft communication to E. Ahern; draft communication to E. Ahern re [REDACTED] [REDACTED] [3]	0.70	545.00	381.50
05/09/2016	T. Peterson	Multiple email exchanges with E. Ahern re [REDACTED] [REDACTED] [4]	0.40	545.00	218.00
05/10/2016	T. Peterson	Review materials to be provided to client re [REDACTED] [2]; email exchanges with E. Ahern re [REDACTED] [REDACTED] [REDACTED] [5]	0.70	545.00	381.50
05/12/2016	T. Peterson	Draft communication to E. Ahern re [REDACTED] [REDACTED] [REDACTED] [3]	0.30	545.00	163.50

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client.Matter #: 018177.0001
Page 6

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2016	T. Peterson	Review communications from E. Ahern re [REDACTED] [2]	0.20	545.00	109.00
05/19/2016	K. Lenhard	Telephone conference with F. Waid	0.20	595.00	119.00
05/20/2016	T. Peterson	Review reply brief filed by F. Waid in support of citation; draft communication to E. Ahern [2]; telephone conference with F. Waid re living expenses request, request from daughters as to distribution of 65% principal as distinct from income [2]	0.40	545.00	218.00
05/26/2016	T. Peterson	Review proposed correspondence to F. Waid; draft communication to E. Ahern re [REDACTED] [2]	0.20	545.00	109.00
05/31/2016	T. Peterson	Confer with K. Lenhard re [REDACTED] [2]	0.20	545.00	109.00
06/01/2016	K. Lenhard	Court appearance, citation hearing	2.20	595.00	1,309.00
06/01/2016	T. Peterson	Review motion, opposition, prior order, in preparation for hearing [5]; review communications from E. Ahern [4]; prepare for and attend hearing on motion for citation; court will not grant but will set status check and issue other order [2.1]; draft multiple communications to E. Ahern re [REDACTED] [4]	3.40	545.00	1,853.00
06/03/2016	T. Peterson	Review communication from J. Powell re other order from January; review revisions; review prior correspondence; email exchanges with T. Moody and J. Powell re order [4]; emails to E. Ahern re [REDACTED] [2]	0.60	545.00	327.00

SA0098

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client Matter #: 018177.0001
Page 7

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/06/2016	T. Peterson	Review [REDACTED] [REDACTED]; draft multiple communications to E. Ahern re [REDACTED] [2]	0.20	545.00	109.00
06/08/2016	T. Peterson	Draft communication to E. Ahern re [REDACTED] [REDACTED] [REDACTED] [2]	0.20	545.00	109.00
06/13/2016	T. Peterson	Review communication from E. Ahern [REDACTED] [REDACTED]; arrange [REDACTED] [1]	0.10	545.00	54.50
06/21/2016	K. Lenhard	Review correspondence Texas counsel; email client	0.30	595.00	178.50
06/21/2016	K. Lenhard	Review Orders	0.20	595.00	119.00
06/21/2016	B. Reitz	Email client re [REDACTED] [REDACTED]	0.20	295.00	59.00
06/24/2016	K. Lenhard	Email client, F. Waid	0.30	595.00	178.50
06/30/2016	K. Lenhard	Email F. Waid	0.20	595.00	119.00
		Total Fees	<u>35.10</u>		<u>\$ 16,869.50</u>

SA0099

Brownstein Hyatt Farber Schreck

Eleanor Albert
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client/Matter #: 018177.0001
Page 8

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	5.80	595.00	\$ 3,451.00
Tamara (Tammy) Beatty Peterson	19.10	545.00	10,409.50
Benjamin K. Reitz	10.20	295.00	3,009.00
Total Fees	35.10		\$ 16,869.50

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/18/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Rushforth Firm - Signed by: Jenny Jackson	8.00
02/18/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Hutchinson & Steffen, LLC - Signed by: B. Neeley	20.00
02/19/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Filed Under Seal/CC	15.00
02/25/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Clark County District Court - Signed by: Delivered	10.00
03/01/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	20.00
03/02/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	10.00
03/02/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	20.00
03/03/2016	Mileage/Parking Expense - Cash - Parking at Court House	20.00
03/08/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	10.00
03/08/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	5.00
03/15/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - District Court Clark County	10.00
03/17/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	20.00
03/18/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Hutchison & Stefan, LLC	31.50
03/24/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Eighth Judicial District Court	5.00

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645566
Client/Matter #: 018177.0001
Page 9

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/19/2016	Delivery/Ground Transportation - Nationwide Legal, Inc. - District Court Clark County	10.00
05/02/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
05/03/2016	Delivery/Ground Transportation - Nationwide Legal, Inc. - Clark County District Court	5.00
05/26/2016	Delivery/Ground Transportation - Nationwide Legal, Inc. - Hutchinson & Steffen LLC	16.50
06/01/2016	Mileage/Parking Expense - Cash - Parking 06/01/2016	10.00
06/20/2016	Delivery/Ground Transportation - Nationwide Legal, Inc. - Eighth Judicial District Court	5.00
06/22/2016	Delivery/Ground Transportation - Nationwide Legal, Inc. - Eighth Judicial District Court	5.00
06/22/2016	Transcript Expense - Clerk Of Court - Transcript of June 1, 2016 Hearing	22.50
07/26/2016	Administrative Fee for Services Through June 30, 2016	421.74
	Total Costs	\$ 725.74

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Delivery/Ground Transportation	\$ 248.00
Filing Fee	3.50
Mileage/Parking Expense	30.00
Transcript Expense	22.50
Administrative Fee	421.74
	\$ 725.74

Total Amount Due This Invoice	\$ 17,595.24
Previous Balance	\$ 278,605.98
Less Credits	-
TOTAL AMOUNT DUE	\$ 296,201.22

SA0101

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: July 26, 2016
Invoice #: 645568
Client.Matter #: 018177.0001
Page 10

ARAGING

0 - 30	31 - 60	61 - 90	91 - 120	121+	Total
\$ -	\$ -	\$ 123,897.95	\$ -	\$ 154,708.03	\$ 278,605.98

SUMMARY OF ACCOUNTS RECEIVABLE

Date	Invoice No.	Amount	Credits	Adjustments	Balance
09/23/2015	615194	\$ 46,043.10	\$(11,920.69)	\$ -	\$ 34,122.41
10/09/2015	616822	20,474.29	-	-	20,474.29
11/23/2015	621331	34,557.84	-	-	34,557.84
01/08/2016	625438	65,553.49	-	-	65,553.49
04/30/2016	636790	123,897.95	-	-	123,897.95
		\$ 290,526.67	\$(11,920.69)	\$ -	\$ 278,605.98

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: July 26, 2016
Invoice #: 645568
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through June 30, 2016

Previous Balance	\$ 278,605.98
Less Credits	-
Balance Forward	\$ 278,605.98
Total Fees	\$ 16,869.50
Total Costs	725.74
Total Amount Due This Invoice	\$ 17,595.24
TOTAL AMOUNT DUE	\$ 296,201.22

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 1675 Broadway
Denver, CO 80202
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 645568

SA0103



Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 14, 2016
Invoice #: 659911
Client.Matter #: 018177.0001

Payable Upon Receipt

Client: Eleanor Ahern
Matter: The W.N. Connell and Marjorie T. Connell Living Trust

INVOICE SUMMARY

For Professional Services Rendered Through November 11, 2016

TOTAL FEES \$ 15,119.50

COSTS

Research - Lexis	\$ 12.91	
Delivery/Ground Transportation	16.50	
Filing Fee	7.00	
Mileage/Parking Expense	49.00	
Administrative Fee	377.99	
	<hr/>	
Total Costs		463.40
		<hr/>
Total Amount Due This Invoice		\$ 15,582.90

SA0104

**Brownstein Hyatt
Farber Schreck**

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
<http://www.bhfs.com>

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 14, 2016
Invoice #: 659911
Client/Matter #: 018177.0001

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through November 11, 2016

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2016	K. Lenhard	Court appearance and order re authorization	2.50	595.00	\$ 1,487.50
08/04/2016	K. Lenhard	Comment on [REDACTED]	0.20	595.00	119.00
08/08/2016	B. Reitz	Review [REDACTED] [REDACTED] in preparation for drafting response; outline response	0.70	295.00	206.50
08/09/2016	K. Lenhard	Email with client	0.20	595.00	119.00
08/09/2016	B. Reitz	Outline [REDACTED] [REDACTED] draft response to petition	2.60	295.00	767.00
08/10/2016	K. Lenhard	Prepare response to Petition	0.20	595.00	119.00
08/10/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
08/17/2016	K. Lenhard	Conference with F. Waid	0.30	595.00	178.50
08/17/2016	B. Reitz	Revise [REDACTED] with comments from K. Lenhard; prepare same for filing; review motion to adjudicate attorney's fees lien; outline response to same; begin drafting same; research [REDACTED] [REDACTED]	5.70	295.00	1,681.50
08/18/2016	K. Lenhard	Review objection attorney lien	0.20	595.00	119.00

SA0105

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 14, 2016
Invoice #: 659911
Client Matter #: 018177.0001
Page 2

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/18/2016	B. Reitz	Finalize Response to Motion for Attorney Lien in preparation for filing	0.30	295.00	88.50
09/07/2016	K. Lenhard	Court hearing re petition to transfer and motion re lien	2.50	595.00	1,487.50
09/08/2016	K. Lenhard	Review orders; email with court; email with client	0.60	595.00	357.00
09/13/2016	K. Lenhard	Telephone conference with T. Coffing re [REDACTED]	0.20	595.00	119.00
09/20/2016	K. Lenhard	Conference with E. Ahern and Marquis Aurbach	0.30	595.00	178.50
09/21/2016	K. Lenhard	Review order re [REDACTED]; email counsel	0.30	595.00	178.50
09/26/2016	K. Lenhard	Conference with clients; prepare for hearing	1.50	595.00	892.50
09/27/2016	K. Lenhard	Conference with counsel	1.00	595.00	595.00
09/29/2016	K. Lenhard	Review [REDACTED]	0.20	595.00	119.00
10/03/2016	K. Lenhard	Telephone conference with client; telephone conference with Trustee	0.60	595.00	357.00
10/04/2016	K. Lenhard	Prepare for Eleanor Ahern deposition	0.30	595.00	178.50
10/04/2016	K. Lenhard	Email Eleanor Ahern physician	0.30	595.00	178.50
10/05/2016	K. Lenhard	Email client; court appearance Petition for Sanctions, deposition of Eleanor Ahern	3.00	595.00	1,785.00
10/12/2016	K. Lenhard	Review proposal; email client	0.30	595.00	178.50
10/14/2016	K. Lenhard	Conference E. Ahern re [REDACTED] [REDACTED]	0.20	595.00	119.00

SA0106

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 14, 2016
Invoice #: 659911
Client Matter #: 018177.0001
Page 3

FEES

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/14/2016	K. Lenhard	Telephone conference F. Waid	0.20	595.00	119.00
10/17/2016	K. Lenhard	Review orders	0.20	595.00	119.00
10/20/2016	K. Lenhard	Email client	0.20	595.00	119.00
10/25/2016	K. Lenhard	Email client re [REDACTED]	0.30	595.00	178.50
10/27/2016	K. Lenhard	Conference with client; conference with F. Waid re expenses	1.00	595.00	595.00
11/01/2016	K. Lenhard	Email client re [REDACTED]	0.20	595.00	119.00
11/04/2016	K. Lenhard	Email F. Waid, E. Ahern re [REDACTED] [REDACTED]	0.40	595.00	238.00
11/07/2016	K. Lenhard	Conference with Trustee; email client; prepare motion to withdraw, fees	0.60	595.00	357.00
11/08/2016	K. Lenhard	Email client [REDACTED]	0.20	595.00	119.00
11/08/2016	K. Lenhard	Email E. Ahern regarding [REDACTED]	0.20	595.00	119.00
11/09/2016	K. Lenhard	Conference with client, Trustee; court appearance regarding motion to compel Buyout	1.50	595.00	892.50
11/09/2016	K. Lenhard	Email client	0.40	595.00	238.00
11/09/2016	K. Lenhard	Email client regarding [REDACTED]	0.30	595.00	178.50
Total Fees			30.10		\$ 15,119.50

SA0107

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 14, 2016
Invoice #: 659911
Client Matter #: 018177.0001
Page 4

TIMEKEEPER SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kirk B. Lenhard	20.80	595.00	\$ 12,376.00
Benjamin K. Reitz	9.30	295.00	2,743.50
Total Fees	30.10		\$ 15,119.50

COSTS

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/15/2016	Delivery/Ground Transportation - Nationwide Legal Nevada, LLC - Frederick Wald	\$ 16.50
08/05/2016	Mileage/Parking Expense - Cash - Parking at Courthouse	10.00
08/17/2016	Research - Lexis - BKR - 1684	12.91
08/18/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
08/18/2016	Filing Fee - U.S. Bank - WIZNET: Electronic Filing Fee	3.50
09/07/2016	Mileage/Parking Expense - Cash - Parking on 09/07/2016	12.00
09/26/2016	Mileage/Parking Expense - Parkway Center, LLC -	13.00
10/05/2016	Mileage/Parking Expense - Cash - Parking, 10/05/16	12.00
11/14/2016	Administrative Fee for Services Through November 11, 2016	377.99
	Total Costs	\$ 463.40

COST SUMMARY

<u>Description</u>	<u>Amount</u>
Delivery/Ground Transportation	\$ 16.50
Filing Fee	7.00
Mileage/Parking Expense	49.00
Research - Lexis	12.91
Administrative Fee	377.99
	\$ 463.40

**Brownstein Hyatt
Farber Schreck**

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 14, 2016
Invoice #: 659911
Client.Matter #: 018177.0001
Page 5

Total Amount Due This Invoice	\$ 15,582.90
Previous Balance	\$ 296,201.22
Less Credits	-
TOTAL AMOUNT DUE	<u>\$ 311,784.12</u>

Brownstein Hyatt Farber Schreck

Eleanor Ahern
Re: The W.N. Connell and Marjorie T. Connell Living Trust

Invoice Date: November 14, 2016
Invoice #: 659911
Client.Matter #: 018177.0001
Page 6

ARAGING

<u>0 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>91 - 120</u>	<u>121+</u>	<u>Total</u>
\$ -	\$ -	\$ -	\$ 17,595.24	\$ 278,605.98	\$ 296,201.22

SUMMARY OF ACCOUNTS RECEIVABLE

<u>Date</u>	<u>Invoice No.</u>	<u>Amount</u>	<u>Credits</u>	<u>Adjustments</u>	<u>Balance</u>
09/23/2015	615194	\$ 46,043.10	\$(11,920.69)	\$ -	\$ 34,122.41
10/09/2015	616822	20,474.29	-	-	20,474.29
11/23/2015	621331	34,557.84	-	-	34,557.84
01/08/2016	625438	65,553.49	-	-	65,553.49
04/30/2016	636790	123,897.95	-	-	123,897.95
07/26/2016	645568	17,595.24	-	-	17,595.24
		<u>\$ 308,121.91</u>	<u>\$(11,920.69)</u>	<u>\$ -</u>	<u>\$ 296,201.22</u>

Brownstein Hyatt Farber Schreck

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway
Suite 1600
Las Vegas, NV 89106
Phone: 702-382-2101
Facsimile: 702-382-8135
[http: www.bhfs.com](http://www.bhfs.com)
EIN: 26-1367865

Eleanor Ahern
8635 W. Sahara Ave., #50
The Lakes, NV 89117-5858

Invoice Date: November 14, 2016
Invoice #: 659911
Client.Matter #: 018177.0001

Payable Upon Receipt

Re: The W.N. Connell and Marjorie T. Connell Living Trust

For Professional Services Rendered Through November 11, 2016

Previous Balance	\$ 296,201.22
Less Credits	-
Balance Forward	\$ 296,201.22
Total Fees	\$ 15,119.50
Total Costs	463.40
Total Amount Due This Invoice	\$ 15,582.90
TOTAL AMOUNT DUE	\$ 311,784.12

PLEASE SEND WITH CHECK TO:

Brownstein Hyatt Farber Schreck, LLP
P.O. Box 172168
Denver, CO 80217-2168

NOTE: The above address is for regular mail delivery only
NO PAYMENTS SHOULD BE SENT CERTIFIED MAIL

OR via Courier Service To:

KeyBank Lockbox Operations
Brownstein Hyatt Farber Schreck, LLP
Lockbox #6025
11030 Circle Point Road
Westminster, CO 80021

WIRE FUNDS TO:

Brownstein Hyatt Farber Schreck, LLP
Bank Name: KeyBank of Colorado
Bank Address: 1675 Broadway
Denver, CO 80202
ABA#: 307070267
Account #: 769681047122
Ref: 018177.0001, Invoice No. 659911

SA0111

Steven D. Grierson

ORDER

JOSEPH J. POWELL (State Bar No. 8875)
DANIEL P. KIEFER (State Bar No. 12419)
THE RUSHFORTH FIRM, LTD.
P. O. Box 371655
Las Vegas, NV 89137-1655
Telephone: (702) 255-4552 / Fax: (702) 255-4677
e-mail: probate@rushforthfirm.com
Attorneys for Jacqueline M. Montoya
and Kathryn A. Bouvier ("Movants")

**DISTRICT COURT
CLARK COUNTY, NEVADA**

In the Matter of

THE W.N. CONNELL and MARJORIE T.
CONNELL LIVING TRUST, dated May 18,
1972,

Case No. P-09-066425-T
Department: 26 (Probate)

A non-testamentary trust.

Date of Hearing: February 9 -10, 2017

ORDER REGARDING MOTION FOR ASSESSMENT OF DAMAGES AGAINST ELEANOR AHERN

A. PROCEDURAL BACKGROUND/OVERVIEW

A.1 A "Motion for Assessment of Damages Against Eleanor Ahern; Enforcement of No Contest Clause; and Surcharge of Eleanor's Trust Income" ("the Motion") was filed on behalf of Jacqueline M. Montoya and Kathryn A. Bouvier ("Movants" or "Ms. Montoya and Ms. Bouvier") on June 3, 2015, and a Supplement to the Motion was filed on July 31, 2015. Ms. Montoya is the currently serving trustee of the MTC Living Trust, dated December 6, 1995, and subsequently restated in its entirety on October 3, 2000 ("MTC Trust"), and is also a beneficiary of the MTC Trust, while Ms. Bouvier is a beneficiary of the MTC Trust.

A.2 An opposition to the Motion was filed on behalf of Eleanor Connell Hartman Ahern

THE RUSHFORTH FIRM, LTD.
Telephone: 702-255-4552 / Fax: 702-255-4677
P.O. Box 371655
Las Vegas, Nevada 89137-1655

(Page 1)

1 ("Ms. Ahern") on June 29, 2015, and a "Motion to Strike Supplement to Motion for Assessment of
2 Damages Against Eleanor Ahern; Enforcement of No Contest Clause; and Surcharge of Eleanor's
3 Trust Income" was filed on August 3, 2015.

4 A.3 An evidentiary hearing was held on February 22, 2016 and continued on March 3,
5 2016. On February 22, 2016 legal arguments were presented by all parties, and the testimony of
6 two witnesses, Fredrick Waid and Jacqueline Montoya, was offered, and on March 3, 2016 closing
7 arguments were made.

8
9 (a) Jacqueline M. Montoya and Kathryn A. Bouvier were jointly represented by
10 attorneys Layne T. Rushforth, Joseph J. Powell, and Daniel F. Kiefer of The Rushforth Firm,
11 Ltd.,

12 (b) Eleanor Connell Hartman Ahern ("Ms. Ahern") was represented by Tamara
13 Beatty Peterson, Esq. and Kirk B. Lenhard, Esq., of Brownstein Hyatt Farber Schreck, LLP;
14 and

15 (c) Fredrick P. Waid ("Mr. Waid"), in his capacity as the acting trustee of THE
16 W.N. CONNELL and MARJORIE T. CONNELL LIVING TRUST, dated May 18, 1972 ("the
17 Trust"), was represented by Todd L. Moody and Russel J. Geist of Hutchison & Steffen,
18 LLC.

19
20 A.4 The result of the evidentiary hearing on February 22, 2016 and March 3, 2016 was
21 the issuance of the "Order Regarding Motion for Assessment of Damages; Enforcement of No
22 Contest Clause; and Surcharge of Trust Income", dated September 13, 2016 ("Order Regarding
23 Motion for Damages").

24 A.5 The Order Regarding Motion for Damages included the following findings:

- 25 1. Ms. Ahern, as Trustee, did not comply with the Court order to protect
26 the 65% share of the Trust that was to be segregated under the terms of the
27 Trust for the Movants, Ms. Montoya and Ms. Bouvier.
28

3. Ms. Ahern's failure to comply with the Court's Order to protect the Movants' 65% share, however, resulted in a misapplication of the Trust income, which deprived the Movants of funds owed to them under the terms of the Trust. Ms. Ahern's misapplication of Trust funds warrants a surcharge against Ms. Ahern's 35% share of the Trust, to be paid to Movants, in a total amount to be determined at a future hearing to be set by this Court.

4. Additional briefing and argument is needed on the issues of punitive and treble damages. It is expected that the additional briefing on such damages, and the hearing on the total amount owed to Movants, will be scheduled after the Successor Trustee, Fredrick P. Waid ("Mr. Waid") finalizes his accounting for the Court.

6. In further violation of this Court's Orders, Ms. Ahern removed some funds from Trust accounts before turning those accounts over to the Successor Trustee, Mr. Waid. Some funds have since been turned over to the Successor Trustee, however, until such time as Mr. Waid can provide an Accounting the Court cannot rule on Ms. Ahern potential liability. The exact amount of any damages resulting from these serious breaches of fiduciary duty will be determined at a later evidentiary hearing.

8. Movant's seek punitive damages, which requires a finding of willful and malicious conduct. In the alternative, Movants seek treble damages for breach of fiduciary duty. Ms. Ahern's conduct was shocking and needs to be dealt with a serious fashion, but the final decision on whether punitive and/or treble damages should be awarded in addition to restitution will be made at the evidentiary hearing to be scheduled after Mr. Waid concludes

discovery and prepares his report and accounting to the Court.

A.6 In the "Order" section of the Order Regarding Motion for Damages, it was stated that:

IT IS FURTHER ORDER ADJUDGED AND DECREED that Mr. Waid shall prepare a report and a trustee's account, and upon completion, a hearing on the amounts owed by Ms. Ahern, including any punitive and treble damages, shall be conducted, unless the parties stipulate otherwise.

A.7 In compliance with this Court's Order Regarding Motion for Damages, on February 1, 2017, Mr. Waid filed his "Accounting and Report of Trust Activity from 2013 to 2015" ("Accounting and Report").

A.8 As it relates to his calculation of the amounts owed to the MTC Trust from Ms. Ahern, Mr. Waid made the following declarations and conclusions in his Accounting and Report:

Since the Appointment of the Successor Trustee in April 2015, this Court has issued numerous orders requiring Ms. Ahern to produce records, comply with deposition notices and cooperate with the Successor Trustee's efforts to prepare an accounting for time periods when she served as Trustee. In response to the Court's orders Ms. Ahern has produced, through her various counsel, only limited records primarily consisting of forwarded mail. She did not appear for any scheduled or ordered depositions notwithstanding the findings of the Court regarding fraud and other misconduct pursuant to hearings on the Motion to Enforce the Trust's No Contest Clause.

Due to her failure to appear and cooperate as ordered, a significant portion of the transactional history that occurred during Ms. Ahern's tenure as trustee cannot be reconciled or explained. As such, and pursuant to Generally Accepted Accounting Principles (GAAP), the Successor Trustee is unable to this provide the

1 Court with definitive information or explain as to the greatly expanded Trust
2 expenditures, either in dollars spent or to whom those dollars were paid, during
3 the accounting period and Ms. Ahern's tenure as Trustee. [Pages 1- 2 of
4 Accounting and Report]

5 *****

6
7 Again, due to Ms. Ahern's failure to answer questions under oath, the
8 rationale and basis for the expenditures remain unanswered and unclear. What
9 is clear is that MTC did not receive a single distribution of royalty income from the
10 Trust between June 2013 and April 2015. [Page 2 of Accounting and Report]

11 *****

12 A significant number of expenses that were authorized by Ms. Ahern appear
13 to have provided no benefit to the Trust and cannot be deemed appropriate,
14 deductible business expenses as defined and permitted by the Internal Revenue
15 Code. [Page 2 of Accounting and Report]

16 *****

17
18 After reviewing available records from the Internal Revenue Service,
19 various banks, oil and gas producers, common royalty recipients (i.e., the Miller
20 family, which shares an equivalent 25% royalty interest as the Trust) and partial
21 reconciliations completed by the accounting firm of Gamon et & King CP As, the
22 Successor Trustee prepared the chart attached as Exhibit B, which sets forth the
23 best available basis for calculation of royalties not paid to the MTC Trust, as
24 required by the terms of the Trust and as determined by this Court's previous
25 findings and orders.

26
27 MTC should have received royalty payments of \$481,010 for 2013,
28 \$2,028,134 for 2014 and \$1,447,406 for 2015, totaling \$3,956,550. MTC received

1 for the three (3) year period a total of \$2,214,497, with \$1,914,622 of the amount
2 being paid after Ms. Ahern was removed as Trustee. The total undistributed
3 royalties for the period is \$1,742,053. [Page 2 - 3 of Accounting and Report]

4 A.9 On February 7, 2017, the Movants filed their Pre-Trial Memorandum, which set forth
5 the amount of damages that the Movants were seeking to be awarded by the Court in light of Mr.
6 Waid's computations and calculations as found in his Accounting and Report.

7
8 A.10 On or about February 8, 2017, Ms. Ahern submitted an *ex parte* request, via
9 correspondence faxed to the Court, to have funds released by Mr. Waid from the Trust for the
10 payment of her representation by Mr. Lawrence Semenza at the evidentiary hearing.

11 A.11 In response to Ms. Ahern's *ex parte* request for an order releasing funds, pursuant
12 to a minute order issued on February 8, 2017, the Court granted Ms. Ahern's request for the release
13 of funds directly to Attorney Semenza "for his reasonable attorney's fees incurred for his
14 representation of Ms. Ahern at the February 9th and 10th evidentiary hearing".

15 A.12 Prior to the start of the evidentiary hearing, Attorney Semenza indicated that he
16 would be unable to represent Ms. Ahern under the circumstances and would have to respectfully
17 decline to accept the representation despite the minute order issued by the Court¹.

18
19 A.13 Subsequent to Attorney Semenza making his decision, Ms. Ahern was informed by
20 the Court of the situation and the fact that the evidentiary would proceed as scheduled. Ms. Ahern
21 replied that because she would not be represented by counsel, she indicated that she was declining
22

23
24 MR. SEMENZA: I have not made an appearance, and I certainly cannot make an appearance under the
25 terms that have been specified in the Court's order. Ms. Ahern, as you indicated last time, Your Honor,
26 needs counsel, and apparently she does not have sufficient funds with which to engage counsel, whether
27 it's me or someone else. And to me, for me to enter an appearance today and for tomorrow, assuming
28 that the hearing were to continue that and then I don't know whether I would have to move the Court
to withdraw since I---in for a pound, in for a penny, whatever. I cannot do that. It would be malpractice
for me to step into this for a hearing this morning, Your Honor, and I cannot do so.

THE COURT: Okay. So you're respectfully declining to appear.

MR. SEMENZA: I am, Your Honor.

1 to speak².

2 A.14 After making such declaration, Ms. Ahern then made an oral request for the
3 evidentiary hearing to be continued which the Court promptly denied³.

4 A.15 At the evidentiary hearing commencing on February 9th, appearances and
5 representations were as follows:

6 (a) The Movants were jointly represented by attorneys Joseph J. Powell and
7 Daniel P. Kiefer of The Rushforth Firm, Ltd.;

8 (b) Ms. Ahern appeared *pro se*; and

9 (c) Mr. Waid, in his capacity as the acting trustee of the Trust, was represented
10 by Todd L. Moody of Hutchison & Steffen, LLC.

11 A.16 The sole witness to provide testimony at the evidentiary hearing was Mr. Waid.

12 A.17 The issues to be determined at the evidentiary hearing were the determination of the
13 compensatory damages owing to the Movants, via their beneficial interests in the MTC Trust, from
14 Ms. Ahern and a determination as to whether exemplary damages would be awarded to the
15 Movants based on Ms. Ahern's conduct and if appropriate the amount of such exemplary damages
16 that was appropriate.
17

18
19 **B. FINDINGS REGARDING COMPENSATORY DAMAGES**

20 The Court makes the following findings and rulings in relation to compensatory damages:

21 B.1 Mr. Waid testified regarding the conclusions found in his Accounting and Report.
22 As such, the Accounting and Report is accepted by the Court in its entirety and the findings and
23 determinations therein relating to figures withheld from the MTC Trust beneficiaries, the Movants,
24

25 ² MS. AHERN: Since I am not represented by counsel, I will not be speaking.

26 THE COURT: Okay. That's understood.

27 ³ MS. AHERN: I would like a continuance.

28 THE COURT: That's denied.

1 by Ms. Ahern, are deemed accurate.

2 B.2 Specifically, between June of 2013 and the end of 2015 that the Movants, through
3 distributions required to be given to the MTC Trust, were entitled to the sum of \$3,956,550.

4 B.3 Further, for the period of June of 2013 through March 31, 2015, the Movants were
5 entitled to the sum of \$2,581,994.92.

6 B.4 Additionally, Mr. Waid made equitable adjustments of income, pursuant to guidance
7 from the Court, after he became trustee in early April of 2015, thus reducing the amount owed to
8 the Movants. As a result, the amount owed to Movants, through the MTC Trust, for the time period
9 of June of 2013 through March 31, 2015, is \$1,742,053.

10 B.5 Ms. Ahern offered no evidence to refute Mr. Waid's Accounting and Report nor his
11 testimony regarding his thorough investigation and subsequent reporting of the findings regarding
12 the same.

13
14 **C. FINDINGS REGARDING EXEMPLARY DAMAGES**

15 The Court makes the following findings and rulings in relation to exemplary damages:

16 C.1 The Movants have asked for this Court to award exemplary damages against Ms.
17 Ahern based on her inappropriate conduct in this matter.

18 C.2 Based on all evidence received and reviewed at the various evidentiary hearings,
19 including testimony of Mr. Waid, the Court finds that the imposition of punitive damages against
20 Ms. Ahern based on her conduct are warranted.

21 C.3 Specifically, Ms. Ahern intentionally and fraudulently breached her fiduciary duties
22 to the MTC Trust, and the Movants, as beneficiaries of the MTC Trust, and committed tortious acts
23 in converting and embezzling Trust funds. Accordingly, the Court finds that Ms. Ahern acted with
24 oppression, fraud, and malice.

25 C.4 Punitive damages are reserved for bad actors who deserve to be punished. See
26 *Coughlin v. Hilton Hotels Corp.*, 879 F.Supp. 1047 (D. Nev. 1995) ("punitive damages are not
27
28

1 designed to compensate the victim of a tortious act but rather to punish and deter oppressive,
2 fraudulent or malicious conduct"). Ms. Ahern's actions deserve to be punished and rise to the level
3 of her having acted with oppression, fraud, and malice.

4 C.5 This Court has the authority to award punitive damages "in an action for the breach
5 of an obligation not arising from contract, where it is proven by clear and convincing evidence
6 that the defendant has been guilty of oppression, fraud, or malice." See NRS 42.005(1).

7 C.6 Once shown, a petitioner, "in addition to the compensatory damages, may recover
8 damages for the sake of example and by way of punishing the defendant an amount equal to
9 three times the amount of compensatory damages awarded to [Petitioner] if the amount of
10 compensatory damages is \$100,000 or more." *Id.*

11 C.7 The evidence presented at the various evidentiary hearings conclusively established
12 that Ms. Ahern willfully and intentionally deceived this Court, and the Movants, by claiming, in a
13 sworn declaration signed under oath, all funds that she was ordered (by the Court) to keep in trust
14 during the pendency of the dispute were "intact and are presently being held in trust."

15 C.8 This Court previously held in its "Order Regarding Motion for Damages," that "the
16 account [Ms. Ahern] filed, under penalty of perjury on March 13, 2015, titled "Brief Regarding
17 Accounting Fiduciary Duties, and Trust Administration" was incomplete and intentionally
18 inaccurate."

19 C.9 In that same order, this Court determined that "Ms. Ahern, as Trustee, did not
20 comply with the Court order to protect the 65% share of the Trust that was to be segregated under
21 the terms of the Trust for the Movants, Ms. Montoya and Ms. Bouvier."

22 C.10 Based on the evidence presented to this Court (i.e. the testimony of Mr. Waid at the
23 hearings occurring on February 22, 2016 and February 9, 2017, together with the exhibits admitted
24 at the same hearings, which include reports made by Mr. Waid), the Court finds that there is clear
25 and convincing evidence that Ms. Ahern committed fraud, oppression, and malice.
26
27
28

C.11 The following factual findings support the Court's findings of fraud, oppression, and malice:

1. Ms. Ahern filed, under penalty of perjury, an intentionally inaccurate accounting with the Court;
2. Ms. Ahern failed to keep funds which were in dispute---i.e. the income attributable to the MTC Trust's 65% share (the "Segregated Funds")---segregated despite Court order to do so (the "Segregation Order");
3. Ms. Ahern represented to the Court, under penalty of perjury, that she was complying with the Court's Segregation Order while she continuously (and secretly) removed large portions of the Segregated Funds from the Trust accounts;
4. Ms. Ahern claimed, under penalty of perjury, that \$500,000 of the Segregated Funds were on deposit with Fidelity Capital Inc. The evidence and testimony in this matter demonstrate that this representation was and is false. There was never \$500,000 on deposit with Fidelity Capital Inc.;
5. Ms. Ahern claimed, under penalty of perjury, that she rented office space for the Trust from Joseph's Properties at a cost of \$1,750 per month pursuant to an alleged lease. The evidence and testimony in this matter demonstrate that this representation was and is false, and that Ms. Ahern never rented office space from Joseph's Properties;
6. While the Segregation Order was in place, Ms. Ahern paid \$300,000 of Segregated Funds to Real Estate Services, a entity operated by Suzanne Nounna. Suzanne Nounna has no beneficial interest in the Trust or the MTC Trust;
7. Ms. Ahern withdrew a substantial amount of Segregated Funds from Trust

1 accounts slightly before, on the day of, and shortly after her removal as
2 trustee. Ms. Ahern made such withdrawals by use of cashier's checks. Mr.
3 Waid testified that Ms. Ahern's use of cashier's checks was "severely
4 reckless" and "troubling" because of such negotiable instrument's status as
5 unprotected, uninsured, bearer paper;

6
7 II. Despite the Segregation Order, Ms. Ahern used Segregated Funds to pay
8 hundreds of thousands of dollars in personal expenses;

9
10 9. On, or around, February 18, 2015, Ms. Ahern removed \$1,287,580.85 of
11 Segregated Funds held in a Wells Fargo Trust account by use of a cashier's
12 check (the "February 2015 Cashier's Check").

13
14 10. After her removal as trustee of the Trust, Ms. Ahern attempted an "all cash"
15 withdrawal of \$100,000 from the Segregated Funds; and the Movant's
16 share.

17
18 C.12 The Court and Mr. Waid provided Ms. Ahern ample opportunity to explain her
19 actions described above and provide appropriate documentation to demonstrate any legitimate
20 purpose for such actions. Ms. Ahern remained silent on these issues and failed to provide any
21 financial documentation relevant to the above issues. More specifically, Ms. Ahern refused to
22 cooperate with Mr. Waid's investigation into Trust assets that went missing during her tenure as
23 trustee, and has willfully and intentionally obstructed and impeded the same.

24
25 C.13 The Court has no choice but to impose an adverse inference against Ms. Ahern
26 pursuant to the standard set for by the Nevada Supreme Court in *Bass-Davis v. Davis*, 122 Nev.
27 442, 134 P.3d 103 (2006). Accordingly, the Court finds that any information and documentation
28 which Ms. Ahern could have provided in relation to Mr. Waid's inquiry would have been adverse
to her legal position. See *id.* at 451-52, 109.

C.14 In the absence of any evidence to the contrary, the Court finds that pursuant to NRS

THE RUSHFORTH FIRM, LTD.
Telephone: 702-255-4532 / Fax: 702-255-4077
PO Box 371655
Las Vegas, Nevada 89137-1655

1 47.250(1) Ms. Ahern's unlawful acts of violating the Segregation Order by removing Segregated
2 Funds "was done with an unlawful intent." Similarly, the Court must also find that pursuant to
3 NRS 47.250(2) Ms. Ahern intended the "ordinary consequences" of her "voluntary acts" of
4 repeatedly removing and withdrawing monies from the Segregated Funds—i.e. that she intended
5 to disregard and violate the Segregation Order.

6
7 C.15 Based on the above, the Court hereby finds that Ms. Ahern's actions in relation to
8 the Movants and the Segregated Funds were undertaken with an conscious disregard of the rights
9 of the Movants and were clearly fraudulent.

10 C.16 Of the above described actions, the Court finds Ms. Ahern's actions in relation to the
11 February 2015 Cashier's Check to be especially troubling and egregious. Although the funds
12 associated with the February 2015 Cashier's Check were eventually recovered through diligent
13 efforts of Mr. Waid, Ms. Ahern's use of this check was nonetheless reprehensible. Mr. Waid
14 testified that such behavior was disturbing. The Court believes that such willful behavior and
15 disregard of the Segregation Order needs to be discouraged, and clearly appears to have been
16 intended to defraud the Trust and the Movants.

17
18 C.17 Having considered the totality of Ms. Ahern's wrongful acts, the adverse inference
19 imposed against Ms. Ahern in accordance with *Bass-Davis v. Davis*, and the unrebutted
20 presumptions set forth at NRS 47.250(1) and (2), the Court believes that the imposition of punitive
21 damages in this matter is appropriate pursuant to NRS 42.005.

22 C.18 As the Court finds Ms. Ahern's actions in relations to the February 2015 Cashier's
23 Check to be the most egregious and reprehensible of Ms. Ahern's conduct, the Court shall treble the
24 amount of funds removed through the February 2015 Cashier's Check (\$1,287,580.85) and award
25 such as a punitive damage in favor of the Movants and against Ms. Ahern. Accordingly, the Court
26 intends to award punitive damages against Ms. Ahern in the amount of ~~\$9,862,742.55~~ (3 X

27 ~~\$1,287,580.85~~ ^{1,287,580.85}
28 ~~\$3,862,742.55~~ ^{\$3,862,742.55}

Page 18

1 C.19 The Court finds that the punitive damage award described above should be paid
2 from and/or offset against Ms. Ahern's share of the Trust.

3 C.20 Given the anticipated compensatory damage award of \$2,581,994.92, which would
4 allow a possible punitive damages award in the amount of \$7,745,984.76, the anticipated punitive
5 damage award described above is well within the statutory bounds set forth in NRS 42.005(1)(a).
6

7 C.21 In accordance with, and in supplement to, the Order Regarding Motion for Damages,
8 the Court finds that Ms. Ahern's share of the Trust shall remain in complete and entire suspension
9 until all damages awarded herein (both compensatory and punitive damage awards), which shall
10 include all relevant interest, fees, and costs, have been fully satisfied. Accordingly, the Movants
11 shall receive all Trust income, with Mr. Waid calculating the relevant portion of Trust income which
12 would otherwise be attributable to Ms. Ahern's 35% share, until such time as Ms. Ahern's debts and
13 liabilities outlined herein are fully satisfied. The determination of whether Ms. Ahern's liabilities
14 to the Movants has been fully satisfied by her 35% share of the Trust shall be made by Mr. Waid in
15 his capacity as successor trustee of the Trust, *except Ms. Ahern's G-PAL may petition the Court for distributions*
16 *necessary for Ms. Ahern's health, maintenance*
17 *well-being*

18 **D. FINDINGS REGARDING AWARD OF ATTORNEY'S FEES AND COSTS**

19 The Court makes the following findings and rulings in relation to the Movants'
20 request for an award of attorney's fees and costs:

21 D.1 An award of attorney's fees and costs is appropriate pursuant to NRS 153.031(3)(b)
22 because:

- 23 1. The Movants' successfully moved the Court for relief "compelling redress of
24 a breach of the trust" pursuant to NRS 153.031(1)(m); and
- 25 2. An award of fees and costs in this matter is necessary to "avoid an injustice"
26 pursuant to NRS 153.031(3) because the Movants' relevant fees and costs are
27 a direct and proximate result of Ms. Ahern's misconduct.

28 D.2 The Court shall entertain a motion for fees from the Movants which shall detail the

THE RUSHFORTH FIRM, LTD.
Telephone: 702-356-4852 / Fax: 702-356-4877
PO Box 371655
Las Vegas, Nevada 89137-1655

1 reasonableness of the requested fees in accordance with the *Brunzell* factors; and

2 D.3 As the Court does not believe that the Movants' are entitled to an award of their fees
3 and costs associated with the recently completed appeal in this matter, the motion for fees shall not
4 include a request for such fees and costs.

5 **E. JUDGMENT AGAINST ELEANOR CONNELL HARTMAN AHERN**

6
7 E.1 Based on the above findings and rulings, the Court hereby ENTERS JUDGMENT
8 FOR COMPENSATORY DAMAGES in favor of the MTC TRUST (of which JACQUELINE M.
9 MONTOYA and KATHRYN A. BOUVIER are beneficiaries) and against ELEANOR CONNELL
10 HARTMAN AHERN as follows:

- 11 1. Compensatory damages in the amount of \$2,581,994.92;
- 12 2. A partial satisfaction of the above award shall be provided to ELEANOR
13 CONNELL HARTMAN AHERN in the amount of \$809,841.92 based on
14 payments made by Mr. Waid in his role as successor trustee of the Trust to
15 the MTC TRUST; accordingly, the current outstanding balance of the
16 compensatory damages awarded above is \$1,742,053;
- 17 3. In accordance with NRS 17.130(2) and NRS 99.040(1), pre-judgment and
18 post-judgment interest shall accrue against this compensatory damage
19 award *at the statutory rate* until fully satisfied;
- 20 4. In light of Mr. Waid's unique knowledge of the partial satisfaction described
21 above, as well as his role as successor trustee, Mr. Waid shall determine and
22 calculate the amount of relevant judgment interest associated with this
23 compensatory damage award;
- 24 5. Ms. Ahern's share of the Trust shall remain in complete and entire
25 suspension until all compensatory damages awarded herein have been fully
26 satisfied; *except for distributions allowed by the*
27 *Court upon petition by Ms. Ahern for ALI*
28 *for her healthy maintenance and care.*

6. The MTC Trust shall receive all net Trust income, with Mr. Waid calculating the relevant portion of the Trust income which would otherwise be attributable to ELEANOR CONNELL HARTMAN AHERN's 35% share, until such time as this is fully satisfied; and

7. The determination of whether ELEANOR CONNELL HARTMAN AHERN's liability related to this compensatory damage award has been fully satisfied shall be made by Mr. Waid in his capacity as successor trustee of the Trust.

E.2 Based on the above findings and rulings, the Court hereby ENTERS JUDGMENT FOR PUNITIVE DAMAGES in favor of the MTC TRUST (of which JACQUELINE M. MONTOYA and KATHRYN A. BOUVIER are beneficiaries) and against ELEANOR CONNELL HARTMAN AHERN as follows:

1. Exemplary damages in the amount of \$^{600,000}~~3,000,000~~55;
2. In accordance with NRS 17.130(2) and NRS 99.040(1), pre-judgment and post-judgment interest shall accrue against this exemplary damage award *at the 5% statutory rate* until fully satisfied;
3. In light of Mr. Waid's unique role as successor trustee, Mr. Waid shall determine and calculate the amount of relevant judgment interest associated with this exemplary damage award;
4. Ms. Ahern's share of the Trust shall remain in complete and entire suspension until all compensatory damages awarded herein have been fully satisfied; *save & except for allowed distributions exp'd pursuant to Ms. Ahern's GAT*;
5. The MTC Trust shall receive all Trust income, with Mr. Waid calculating the relevant portion of Trust income which would otherwise be attributable to ELEANOR CONNELL HARTMAN AHERN's 35% share, until such time as this is fully satisfied; and

THE RUSHFORTH FIRM, LTD.
Telephone: 702-332-1552 / Fax: 702-332-4077
PO Box 371655
Las Vegas, Nevada 89137-1655

6. The determination of whether ELEANOR CONNELL HARTMAN AHERN's liability related to this exemplary damage award has been fully satisfied shall be made by Mr. Waid in his capacity as successor trustee of the Trust.


DISTRICT COURT JUDGE

August 4, 2017
Date

Submitted by:

THE RUSHFORTH FIRM, LTD.



JOSEPH J. POWELL

State Bar No. 8875

DANIEL P. KIEFER

State Bar No. 12419

P. O. Box 371655

Las Vegas, NV 89137-1655

probate@rushforthfirm.com

*Attorneys for Jacqueline M. Montoya and
Kathryn A. Bouvier*

Approved as to form and content:

HUTCHISON & STEFFEN, LLC



TODD L. MOODY

State Bar No. 6430

10080 West Alta Drive, Suite 200

Las Vegas, Nevada 89145

tmoody@hutchlegal.com

rgeist@hutchlegal.com

*Attorneys for Fredrick P. Waid,
Court-appointed Trustee*