

IN THE SUPREME COURT OF THE STATE OF NEVADA

DERRICK POOLE,

Appellant,

v

NEVADA AUTO DEALERSHIP
INVESTMENTS LLC a Nevada
Limited Liability Company d/b/a
SAHARA CHRYSLER, JEEP,
DODGE, and COREPOINTE
INSURANCE COMPANY,

Respondents,

Appeal from the Eighth Judicial District Court, Clark County.
The Honorable Nancy Alff, District Court Judge

Supreme Court Case No: 74808

Electronically Filed
Jun 18 2018 09:23 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

District Court Case No:
A-16-737120-C

APPELLANT'S APPENDIX VOLUME 7

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| 1 | 8/16/17 | Defendant Nevada Auto Dealership Investments LLC D/B/A Sahara Chrysler Jeep, Dodge and Corepoint Insurance Co's Answer to First Amended Complaint | 034-047 |
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| | | | |
|-----|----------|--|-----------|
| 4 | 11/12/17 | Decision and Order Granting Defendants' Motion For Summary Judgment | 845-848 |
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| 4 | 12/8/17 | Motion to Retax and Settle Costs | 855-865 |
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| 7 | 3/28/18 | Judgment | 1404-1405 |
| 7 | 3/28/18 | Notice of Entry of Judgment | 1406-1409 |



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Page:
October 03, 2017
Account No: 12386-005
Statement No: 18661

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | <u>Rate</u> | <u>Hours</u> | |
|------------|-----|---|-------------|--------------|--------|
| 09/01/2017 | SJS | Review upcoming deadlines. | 350.00 | 0.30 | 105.00 |
| 09/05/2017 | SJS | [REDACTED] | 350.00 | 0.40 | 140.00 |
| | SJS | Exchange emails with G. West RE:: deposition scheduling. | 350.00 | 0.20 | 70.00 |
| | JAB | [REDACTED] (.40). | 450.00 | 0.40 | 180.00 |
| | JAB | Conference call with George West regarding settlement (.5). | 450.00 | 0.50 | 225.00 |
| | JAB | Exchange numerous email communication between the parties (.5). | 450.00 | 0.50 | 225.00 |
| | JAB | [REDACTED] | | | |
| | | [REDACTED] (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of numerous email exchange between the parties (.3). | 450.00 | 0.30 | 135.00 |
| 09/06/2017 | SJS | Exchange emails with G. West RE:: scheduling. | 350.00 | 1.10 | 385.00 |
| | SJS | [REDACTED] | 350.00 | 0.40 | 140.00 |
| | SJS | [REDACTED] | 350.00 | 0.90 | 315.00 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | SJS | [REDACTED] | 350.00 | 1.80 | 630.00 |
| 09/07/2017 | SJS | Exchange emails with G. West RE:: depositions. | 350.00 | 0.40 | 140.00 |
| | SJS | Review amended deposition notice. | 350.00 | 0.20 | 70.00 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.00 |
| | SJS | Draft motion for protective order. | 350.00 | 2.30 | 805.00 |
| | SJS | [REDACTED] | | | |
| | | [REDACTED] | 350.00 | 1.30 | 455.00 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | JAB | Review, edit and revise of motion for protective order on order shortening (1.0). | 450.00 | 1.00 | 450.00 |
| | JAB | Review of exhibits for motion for protective order (.6). | 450.00 | 0.60 | 270.00 |
| 09/08/2017 | SJS | Review amended deposition notice. | 350.00 | 0.20 | 70.00 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.00 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.00 |
| 09/11/2017 | SJS | [REDACTED] :: [REDACTED] | 350.00 | 0.10 | 35.00 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | <u>Rate</u> | <u>Hours</u> | |
|------------|-----|--|-------------|--------------|-------|
| | SJS | Telephone call with N. Kanute RE:: deposition scheduling. | 350.00 | 0.20 | 70.0 |
| | SJS | [REDACTED] | 350.00 | 1.00 | 350.0 |
| | SJS | Review Motion for Protective order on Order shortening time, signed and hearing date for service and filing. | 350.00 | 0.40 | 140.0 |
| | SJS | Exchange emails with G. West RE:: deposition scheduling. | 350.00 | 0.20 | 70.0 |
| | JAB | Exchange email communication with counsel (.2). | 450.00 | 0.20 | 90.0 |
| | JAB | Receive and review of plaintiff motion to counsel responses to interrogatories with requests for production of drafts (1.4). | 450.00 | 1.40 | 630.0 |
| 09/12/2017 | SJS | Draft stipulation RE:: hearing and deposition. | 350.00 | 0.40 | 140.0 |
| | SJS | Review motion to compel filed by Plaintiff. | 350.00 | 0.80 | 280.0 |
| | SJS | Review "opposition" filed by Plaintiff. | 350.00 | 0.10 | 35.0 |
| | SJS | Exchange emails with B. Phillips RE:: [REDACTED] | 350.00 | 0.20 | 70.0 |
| | SJS | Review and exchange emails with G. West RE:: stipulation. | 350.00 | 0.40 | 140.0 |
| | JAB | Exchange numerous email communication counsel (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Receive and review of plaintiff's opposition to motion for protective order (.2). | 450.00 | 0.20 | 90.0 |
| | JAB | Review of proposal stipulation to counsel (.2). | 450.00 | 0.20 | 90.0 |
| 09/13/2017 | SJS | Review documents for deposition preparation. | 350.00 | 0.40 | 140.0 |
| 09/14/2017 | SJS | Exchange email with G. West RE:: scheduling of motions. | 350.00 | 0.20 | 70.0 |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.0 |
| | SJS | [REDACTED] | 350.00 | 0.60 | 210.0 |
| | SJS | [REDACTED] | 350.00 | 0.10 | 35.0 |
| | SJS | Draft correspondence to chambers RE:: motion scheduling. | 350.00 | 0.30 | 105.0 |
| 09/15/2017 | SJS | [REDACTED] | 350.00 | 0.30 | 105.0 |
| | SJS | [REDACTED] | 350.00 | 0.10 | 35.0 |
| | SJS | [REDACTED] | 350.00 | 0.80 | 280.0 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.0 |
| | JAB | [REDACTED] (.3). | 450.00 | 0.30 | 135.0 |
| 09/17/2017 | SJS | [REDACTED] | 350.00 | 0.10 | 35.0 |
| 09/18/2017 | SJS | [REDACTED] | 350.00 | 0.10 | 35.0 |
| | SJS | Exchange emails with G. West RE:: deposition confirmation. | 350.00 | 0.40 | 140.0 |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.0 |
| | SJS | [REDACTED] | 350.00 | 1.40 | 490.0 |
| | SJS | [REDACTED] | 350.00 | 1.20 | 420.0 |
| 09/19/2017 | SJS | Review scheduling order and dates for motions and litigation. | 350.00 | 0.50 | 175.0 |
| | SJS | Attend deposition of N. Grant. | 350.00 | 1.30 | 455.0 |
| | SJS | [REDACTED] | 350.00 | 0.90 | 315.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| | SJS | [REDACTED] | | | |
| | SJS | [REDACTED] | 350.00 | 1.90 | 665.00 |
| | SJS | [REDACTED] | 350.00 | 0.70 | 245.00 |
| 09/20/2017 | AD | [REDACTED] (.8). | 350.00 | 0.80 | 280.00 |
| | AD | [REDACTED] (1.9). | 350.00 | 1.90 | 665.00 |
| | SJS | [REDACTED] | 350.00 | 0.80 | 280.00 |
| | SJS | Attend deposition of T. Spruell. | 350.00 | 2.20 | 770.00 |
| | SJS | [REDACTED] | | | |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.00 |
| | SJS | Research [REDACTED] | | | |
| | SJS | [REDACTED] | 350.00 | 1.40 | 490.00 |
| | SJS | [REDACTED] | 350.00 | 0.90 | 315.00 |
| 09/21/2017 | AD | [REDACTED] (.6). | 350.00 | 0.60 | 210.00 |
| | AD | [REDACTED] (.6). | 350.00 | 0.60 | 210.00 |
| | AD | [REDACTED] (1.2). | 350.00 | 1.20 | 420.00 |
| | SJS | [REDACTED] | 350.00 | 1.70 | 595.00 |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.00 |
| | SJS | [REDACTED] | 350.00 | 0.60 | 210.00 |
| | JAB | Review of second amended responses to request for admissions (.6). | 450.00 | 0.60 | 270.00 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | SJS | [REDACTED] | 350.00 | 1.80 | 630.00 |
| | SJS | Drafting of motion for summary judgment. | 350.00 | 0.80 | 280.00 |
| 09/22/2017 | AD | Review notes from review of expert materials and draft questions for expert testimony (1.7). | 350.00 | 1.70 | 595.00 |
| | SJS | Draft email to G. West RE: motion to compel. | 350.00 | 0.10 | 35.00 |
| | JAB | Review of summary email issue raised by George West (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of notice of change of status on plaintiff's motion to complete and summary motion for protective order (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Discussion with George West (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Review of issues with exchange email communication with counsel (.4). | 450.00 | 0.40 | 180.00 |
| | SJS | Attend and take deposition of Plaintiff's expert R. Avellini. | 350.00 | 6.10 | 2,135.00 |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.00 |
| | SJS | Drafting for motion for summary judgment. | 350.00 | 0.90 | 315.00 |
| | SJS | Review notice and status filed by plaintiff's counsel. | 350.00 | 0.20 | 70.00 |
| | SJS | Exchange emails with G. West RE: motions to compel. | 350.00 | 0.30 | 105.00 |
| | SJS | Vacate motion for protective order. | 350.00 | 0.20 | 70.00 |
| | SJS | Continued preparation for deposition. | 350.00 | 1.70 | 595.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 09/24/2017 | SJS | [REDACTED] | 350.00 | 1.30 | 455.00 |
| 09/25/2017 | SJS | Review eighth supplement from plaintiff naming new witnesses. | 350.00 | 0.20 | 70.00 |
| | SJS | Draft correspondence regarding impropriety of new witnesses. | 350.00 | 0.60 | 210.00 |
| | SJS | Draft opposition to motion to compel Request for Admissions. | 350.00 | 2.10 | 735.00 |
| | SJS | Supplemental review of responses to requests for admissions. | 350.00 | 0.70 | 245.00 |
| | SJS | Exchange emails with Court reporters RE:: transcripts. | 350.00 | 0.40 | 140.00 |
| | SJS | Continued drafting of motion for summary judgment. | 350.00 | 1.70 | 595.00 |
| | SJS | Supplemental drafting of arguments for motions for summary judgment. | 350.00 | 1.60 | 560.00 |
| | SJS | Drafting of additional arguments for motion for summary judgment. | 350.00 | 1.30 | 455.00 |
| | JAB | Review, edit and draft opposition to plaintiff's motion to compel additional responses (1.0). | 450.00 | 1.00 | 450.00 |
| | JAB | Review of draft settlement offer for George West (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Review of objection needed (.6) | 450.00 | 0.60 | 270.00 |
| | JAB | Receive and review of plaintiff's eight supplement disclosure of documents with witnesses (.8). | 450.00 | 0.80 | 360.00 |
| 09/26/2017 | SJS | Revise opposition to motion to compel Request for Admissions responses. | 350.00 | 0.40 | 140.00 |
| | SJS | [REDACTED] | 350.00 | 1.40 | 490.00 |
| | SJS | [REDACTED] | 350.00 | 2.30 | 805.00 |
| | SJS | Continued drafting of motion for summary judgment. | 350.00 | 1.60 | 560.00 |
| | SJS | Review scheduling order RE:: motions in limine and pretrial deadlines. | 350.00 | 0.30 | 105.00 |
| | SJS | Review 8th supplement from plaintiff. | 350.00 | 0.30 | 105.00 |
| | JAB | Review and edit of finalized opposition to motion compel (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | [REDACTED] (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of outline of motion for summary judgement (1.5). | 450.00 | 1.50 | 675.00 |
| | JC | [REDACTED] | 175.00 | 1.80 | 315.00 |
| | JC | [REDACTED] | 175.00 | 1.70 | 297.50 |
| | JC | [REDACTED] | 175.00 | 1.80 | 315.00 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | [REDACTED] (1.4). | 450.00 | 1.40 | 630.00 |
| 09/27/2017 | SJS | [REDACTED] | 350.00 | 1.10 | 385.00 |
| | SJS | Review of expert deposition transcript for motion to strike. | 350.00 | 1.70 | 595.00 |
| | JAB | Discussion with George West (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of numerous issues raised by court (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Telephone call with law clerk Department 22 (.2). | 450.00 | 0.20 | 90.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | <u>Rate</u> | <u>Hours</u> | |
|-----|---|-------------|---------------|------------------|
| JAB | Begin review of revisions to draft motion for summary judgment (1.4). | 450.00 | 1.40 | 630.00 |
| JC | Review of Draft Motion for Summary Judgment. | 175.00 | 1.10 | 192.50 |
| SJS | [REDACTED] | | | |
| | [REDACTED] | 350.00 | 1.90 | 665.00 |
| SJS | Commence research and review of sources and authority for motion to strike. | 350.00 | 1.80 | 630.00 |
| SJS | Review of documents and transcript for motion to strike. | 350.00 | 1.90 | 665.00 |
| JAB | Attend hearing in front of discovery commissioner (1.0). | 450.00 | 1.00 | 450.00 |
| JAB | Continue with reviews and analysis of needed motion in Limine and motion to strike (1.2). | 450.00 | 1.20 | 540.00 |
| | | | <u>115.70</u> | <u>41,425.00</u> |

Expenses

| | | | |
|------------|--------------------------------------|--|--------------------|
| 09/12/2017 | Clark County Clerk | | |
| | 1483272 Certificate of Service (mlf) | | 3.50 |
| 09/25/2017 | Huebner Court Reporting, Inc. | | |
| | Inv# 2259 | | 796.00 |
| 09/25/2017 | Huebner Court Reporting, Inc. | | |
| | Inv# 2258 | | 414.20 |
| 09/25/2017 | Wreck Check Car Scan Centers | | |
| | Inv# 3521 (mlf) | | 1,470.00 |
| | Total Expenses | | 2,683.70 |
| | Total amount of this bill | | 44,108.70 |
| | Previous Balance | | \$26,230.40 |
| | Please Remit Balance Due | | <u>\$70,339.10</u> |



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J.T. MORAN III
JUSTIN W. SMERBER

ADAM S. DAVIS
MATTHEW B. SIBERT
KRIS D. KLINGSMITH
MATTHEW D. WHITTAKER
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Page:
November 09, 2017
Account No: 12386-005
Statement No: 18716

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 09/28/2017 | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | SJS | Draft motion to continue trial. | 350.00 | 1.60 | 560.00 |
| | SJS | Draft motion in limine RE:: references to Consumer attorneys against auto fraud. | 350.00 | 1.40 | 490.00 |
| | SJS | Supplemental drafting on motion to strike expert. | 350.00 | 1.80 | 630.00 |
| | SJS | Additional citations and deposition transcript review and drafting. | 350.00 | 1.90 | 665.00 |
| | JC | [REDACTED] | 175.00 | 1.80 | 315.00 |
| | JC | [REDACTED] | 175.00 | 1.90 | 332.50 |
| | JC | [REDACTED] | 175.00 | 1.60 | 280.00 |
| | JC | Review of potential motions in limine. | 175.00 | 1.10 | 192.50 |
| | JAB | Continue with draft of motion for survey judgement (1.0). | 450.00 | 1.00 | 450.00 |
| | JAB | Exchanged communication with counsel (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of drafts discovery order for George West (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of exchanged of numerous email communications with George West (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of numerous actions needed with related matter (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Review and outline of numerous motion in Limine and to exclude certain testimony and evidence (1.5). | 450.00 | 1.50 | 675.00 |
| 09/29/2017 | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | SJS | Review of motion to strike. | 350.00 | 1.40 | 490.00 |
| | SJS | Prepare exhibits and revise citations to motion to strike expert. | 350.00 | 1.80 | 630.00 |
| | JC | [REDACTED] | 175.00 | 1.20 | 210.00 |
| | JC | [REDACTED] | 175.00 | 1.90 | 332.50 |
| | JC | [REDACTED] | 175.00 | 1.80 | 315.00 |
| | JC | [REDACTED] | 175.00 | 1.90 | 332.50 |
| | JAB | Review, edit and revise of draft motion to exclude exhibit report with expert testimony (1.6). | 450.00 | 1.60 | 720.00 |
| | JAB | Review, edit with revise draft motion to continue trial order shortening time (.8). | 450.00 | 0.80 | 360.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|-------|
| | JAB | [REDACTED] (.5). | 450.00 | 0.50 | 225.0 |
| | JAB | [REDACTED] (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Meet and conference with George West (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Attend meeting and conference with George West (.6). | 450.00 | 0.60 | 270.0 |
| | JAB | Continue with revision and finalize draft motion to exclude expert witnesses testimony and report (1.4). | 450.00 | 1.40 | 630.0 |
| | SJS | Supplemental edits and exhibits for motion for summary judgment. | 350.00 | 1.30 | 455.0 |
| | SJS | [REDACTED] . | 350.00 | 1.80 | 630.0 |
| | JAB | Review of draft Motion to Strike all Reference to Auto Fraud and George West's Law Firm (1.0). | 450.00 | 1.00 | 450.0 |
| 10/01/2017 | SJS | Draft stipulation regarding motions in limine. | 350.00 | 0.60 | 210.0 |
| | SJS | Draft motion in limine no. 1 to preclude previously undisclosed witnesses. | 350.00 | 1.20 | 420.0 |
| | SJS | Draft motion in limine RE:: preclude frame damage. | 350.00 | 1.30 | 455.0 |
| | SJS | Draft Motion in limine to preclude safety opinion. | 350.00 | 1.30 | 455.0 |
| 10/02/2017 | SJS | [REDACTED] | 350.00 | 0.20 | 70.0 |
| | SJS | Draft email to G. West RE:: stipulation and order. | 350.00 | 0.20 | 70.0 |
| | SJS | Edit motion in limine stipulation. | 350.00 | 0.10 | 35.0 |
| | SJS | Supplemental revisions to motion for summary judgment. | 350.00 | 1.60 | 560.0 |
| | SJS | Draft revisions to four motions in limine. | 350.00 | 1.60 | 560.0 |
| | SJS | Review exhibits to motions in limine and prepare for filing. | 350.00 | 0.60 | 210.0 |
| | SJS | Review and prepare exhibits to motion for summary judgment. | 350.00 | 1.70 | 595.0 |
| | SJS | Review and edit citations and facts references. | 350.00 | 1.10 | 385.0 |
| | SJS | Supplemental revision and review of motion for summary judgment exhibits and excerpts. | 350.00 | 1.20 | 420.0 |
| | SJS | Draft motion in limine to preclude general consumer perception. | 350.00 | 0.80 | 280.0 |
| | SJS | Review filing notice and hearing date for motion for summary judgment. | 350.00 | 0.10 | 35.0 |
| | JAB | Continue with revisions to draft motion for summary judgment (1.5). | 450.00 | 1.50 | 675.0 |
| | JAB | Exchange numerous email communication with counsel (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Telephone call with George West (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Exchange email communications with George West (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Receive and review of new offer for plaintiff on settlement (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Review, edit and draft proposal stipulation on trial exclusions (.6). | 450.00 | 0.60 | 270.0 |
| | JAB | Review, edit and finalize motion in Limine one on one striking late disclosed witness (1.0). | 450.00 | 1.00 | 450.0 |
| | JAB | Review, edit and finalize motion in Limine two relating to frame damage to vehicle (.7). | 450.00 | 0.70 | 315.0 |
| | JAB | Review, edit and finalize in Limine three, relating to testimony on vehicle (.8). | 450.00 | 0.80 | 360.0 |
| | JAB | Review, edit and finalize motion in Limine four relating to consumer expectation (.5). | 450.00 | 0.50 | 225.0 |
| | JAB | Review of issues relating to stipulation on hearing (.4). | 450.00 | 0.40 | 180.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|-------|
| 10/03/2017 | SJS | Review filing confirmations and motion hearing dates. | 350.00 | 0.40 | 140.0 |
| | JAB | Exchange numerous email communications with counsel (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Review of proposed stipulation for George West (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Review of numerous issues with request made by George West (.4). | 450.00 | 0.40 | 180.0 |
| | SJS | Review email from chambers RE:: Order shortening time for hearing. | 350.00 | 0.10 | 35.0 |
| | SJS | Review email and proposed stipulation from G. West. | 350.00 | 0.20 | 70.0 |
| | SJS | Review email and invoice from G. West RE:: R. Avellini. | 350.00 | 0.20 | 70.0 |
| | SJS | Revise responses to first Request for Admissions to Plaintiff. | 350.00 | 0.80 | 280.0 |
| | SJS | Review updated CV for expert R. Avellini. | 350.00 | 0.20 | 70.0 |
| | SJS | Review of all deadlines for pretrial and potential deadlines for motions and scheduling. | 350.00 | 1.40 | 490.0 |
| 10/04/2017 | JAB | Receive and review of proposal stipulation for George West (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Review of trial subpoena for counsel (.4). | 450.00 | 0.40 | 180.0 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.0 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.0 |
| | SJS | Review signed Order shortening time and service of motion to continue trial. | 350.00 | 0.20 | 70.0 |
| | SJS | Review G. West changes and email for stipulation on motions in limine. | 350.00 | 0.60 | 210.0 |
| | SJS | Finalize responses to requests for admissions, email G. West. | 350.00 | 0.20 | 70.0 |
| | SJS | Review Discovery Commissioner's Report and Recommendations and execute copy. | 350.00 | 0.30 | 105.0 |
| | SJS | Review of trial subpoenas issued by G. West. | 350.00 | 0.60 | 210.0 |
| | SJS | Review email from C. Friedberg RE:: stipulation and attachment. | 350.00 | 0.40 | 140.0 |
| | SJS | Review service of subpoena duces tecum and documents. | 350.00 | 0.30 | 105.0 |
| | JAB | Receive and review of proposed changes to agreed upon stipulation to exclude certain evidence and testimony (.8). | 450.00 | 0.80 | 360.0 |
| 10/05/2017 | JAB | Exchange numerous email communication with George West (.3) | 450.00 | 0.30 | 135.0 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.0 |
| | JAB | Review and analyze issues raised by George West (.5). | 450.00 | 0.50 | 225.0 |
| | JAB | Receive and review of subpoena Duces Team for trial (.4). | 450.00 | 0.40 | 180.0 |
| | SJS | Exchange emails with G. West RE:: Discovery Commissioner's Report and Recommendations signature. | 350.00 | 0.20 | 70.0 |
| | SJS | Review email exchange regarding stipulation to continue hearing. | 350.00 | 0.20 | 70.0 |
| | SJS | Review email exchange RE:: [REDACTED] | 350.00 | 0.20 | 70.0 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.0 |
| | SJS | Revise proposed order. | 350.00 | 0.20 | 70.0 |
| | SJS | Check minutes and court docket to determine if minutes posted. | 350.00 | 0.10 | 35.0 |
| | SJS | Review pre-trial requirements and initial preparation for 2.67. | 350.00 | 1.70 | 595.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 10/06/2017 | JAB | Exchange numerous email communication with George West (.4) | 450.00 | 0.40 | 180.00 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.00 |
| | SJS | [REDACTED] | 350.00 | 0.70 | 245.00 |
| | SJS | Draft email to G. West RE:: invoice and payment to expert. | 350.00 | 0.30 | 105.00 |
| | SJS | Review exchange of emails RE:: Poole and invoices. | 350.00 | 0.40 | 140.00 |
| | SJS | Exchange of emails with C. Friedberg. | 350.00 | 0.20 | 70.00 |
| 10/09/2017 | SJS | Review emails from G. West RE: trial subpoenas and information. | 350.00 | 0.40 | 140.00 |
| | SJS | Review letter RE:: confirmation to expert to G. West. | 350.00 | 0.20 | 70.00 |
| | SJS | Review filing RE:: service only of application to continue hearings on Defendant's motions. | 350.00 | 0.20 | 70.00 |
| | SJS | Review evidentiary stipulations. | 350.00 | 0.40 | 140.00 |
| | SJS | Review ex parte application to move defendant's motions. | 350.00 | 0.70 | 245.00 |
| | JAB | Receive and review of numerous emails for George West (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of all trial subpoenas for counsel of related proposal stipulation (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Receive and review of expert application to continue hearing in district court filed by plaintiff (.5). | 450.00 | 0.50 | 225.00 |
| | JAB | Review of actions needed in opposition and reply briefs (.8). | 450.00 | 0.80 | 360.00 |
| 10/10/2017 | SJS | [REDACTED] | 350.00 | 0.20 | 70.00 |
| | SJS | Review pretrial notice served by plaintiff's counsel. | 350.00 | 0.20 | 70.00 |
| | SJS | Review trial subpoenas. | 350.00 | 0.40 | 140.00 |
| | SJS | Draft email to G. West RE:: trial subpoenas and other issues. | 350.00 | 0.20 | 70.00 |
| | JAB | Receive and review of notice of 2.62 pretrial conference (.5). | 450.00 | 0.50 | 225.00 |
| | JAB | Receive and review of revised trial subpoenas (.6). | 450.00 | 0.60 | 270.00 |
| | JAB | Receive and review of revised subpoenas (.6). | 450.00 | 0.60 | 270.00 |
| | JAB | Review of email exchange between the parties (.3). | 450.00 | 0.30 | 135.00 |
| 10/11/2017 | SJS | Review emails with trial subpoenas to / from G. West. | 350.00 | 0.20 | 70.00 |
| | SJS | Review revised trial subpoenas. | 350.00 | 0.30 | 105.00 |
| | SJS | Review file RE:: other trial subpoenas and potential witnesses. | 350.00 | 0.60 | 210.00 |
| | SJS | Review email exchange RE:: revised trial subpoenas. | 350.00 | 0.20 | 70.00 |
| | SJS | Draft limited opposition to plaintiff's motion to continue hearings. | 350.00 | 1.10 | 385.00 |
| | SJS | Exchange emails with G. West RE:: 2.67. | 350.00 | 0.30 | 105.00 |
| | SJS | Review protocol and rules for 2.67. | 350.00 | 0.30 | 105.00 |
| | JAB | Review of email communication and revised trial subpoenas (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of numerous email communication between the parties relating to 2.67 conference (.2). | 450.00 | 0.20 | 90.00 |
| | JAB | Exchange additional email communication with counsel (.3). | 450.00 | 0.30 | 135.00 |
| 10/12/2017 | SJS | Review emails from G. West and J. Bendavid RE:: rescheduling and previous agreements. | 350.00 | 0.50 | 175.00 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|-------|
| | JAB | Exchange numerous email communications with George West (.4). | 450.00 | 0.40 | 180.0 |
| | JAB | Receive and review of trial subpoena (.4). | 450.00 | 0.40 | 180.0 |
| | JAB | Receive and review of trial subpoena Duces Team (.4). | 450.00 | 0.40 | 180.0 |
| | SJS | [REDACTED] | 350.00 | 0.10 | 35.0 |
| | SJS | Draft limited opposition to motion to continue hearing dates. | 350.00 | 0.60 | 210.0 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.0 |
| | SJS | Review 2.67 emails exchanged. | 350.00 | 0.50 | 175.0 |
| 10/13/2017 | SJS | Draft revisions and prepare for filing the limited opposition to motion to continue hearings. | 350.00 | 0.60 | 210.0 |
| | SJS | Review emails from G. West RE: Order shortening time and plaintiff's application. | 350.00 | 0.20 | 70.0 |
| | SJS | Review emails RE: EDCR 2.67 prepare trial and scheduling. | 350.00 | 0.30 | 105.0 |
| | SJS | Review email from G. West RE: Order shortening time and email exchange with court. | 350.00 | 0.20 | 70.0 |
| | JAB | Exchange email communication with George West (.2). | 450.00 | 0.20 | 90.0 |
| | JAB | Review, edit and finalize limited opposition to plaintiff's motion to continue and related affidavit (.8). | 450.00 | 0.80 | 360.0 |
| | JAB | Receive and review of Order shortening time on plaintiffs motion (.2). | 450.00 | 0.20 | 90.0 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.0 |
| 10/16/2017 | SJS | Review email from G. West RE: opposition | 350.00 | 0.10 | 35.0 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.0 |
| | SJS | Draft email to G. West RE: stipulation regarding motions in limine. | 350.00 | 0.20 | 70.0 |
| | SJS | Revise stipulation for motions in limine. | 350.00 | 0.30 | 105.0 |
| | JAB | Receive and review of Plaintiff's Opposition to Motion to Continue Trial (.8). | 450.00 | 0.80 | 360.0 |
| | JAB | Exchange email communication with George West (.3). | 450.00 | 0.30 | 135.0 |
| | SJS | Telephone call to T. Lepper office. | 350.00 | 0.10 | 35.0 |
| 10/17/2017 | SJS | Review minute order disclosure of law clerk, review docket for additional minutes. | 350.00 | 0.40 | 140.0 |
| | JAB | Receive and review of Plaintiff's Opposition to Motion to Continue Trial (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | Receive and review of Minute Order regarding conflicts from Court (.2) | 450.00 | 0.20 | 90.0 |
| 10/18/2017 | SJS | [REDACTED] | 350.00 | 0.70 | 245.0 |
| | SJS | Review documents for hearing to continue trial. | 350.00 | 1.10 | 385.0 |
| | JAB | Attend hearing in District Court on Defendant's Motion to Continue Trial and Plaintiff's Motion to Continue pending hearing on all of Defendant's Motions (1.0). | 450.00 | 1.00 | 450.0 |
| 10/20/2017 | SJS | Review service notifications verifying plaintiff filing. | 350.00 | 0.40 | 140.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | <u>Rate</u> | <u>Hours</u> | |
|------------|-----|--|-------------|--------------|--------|
| | JAB | Exchange email communication with George West (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of Plaintiff's Opposition to Defendant's Motion for Summary Judgment (1.6). | 450.00 | 1.60 | 720.00 |
| | JAB | Receive and review of Plaintiff's Separate Statement of Undisputed Material Facts in Support to Plaintiff's Objection (1.2). | 450.00 | 1.20 | 540.00 |
| | JAB | Receive and review of Plaintiff's Response to Plaintiff's Undisputed Facts (.8) | 450.00 | 0.80 | 360.00 |
| 10/21/2017 | SJS | Review email re: stipulation from G. West. | 350.00 | 0.10 | 35.00 |
| | SJS | Review filing notices and additional email regarding edit in G. West email. | 350.00 | 0.20 | 70.00 |
| 10/22/2017 | SJS | Review email from G. West RE:: errata. | 350.00 | 0.10 | 35.00 |
| 10/23/2017 | SJS | Review various filings in opposition to motion for summary judgment. | 350.00 | 0.80 | 280.00 |
| | SJS | [REDACTED] | 350.00 | 0.40 | 140.00 |
| | SJS | Review notice of errata. | 350.00 | 0.20 | 70.00 |
| | SJS | Review filing of Plaintiff's exhibits. | 350.00 | 0.10 | 35.00 |
| | SJS | Review filing notifications of opposition and additional pleadings from D. Poole. | 350.00 | 0.30 | 105.00 |
| | JAB | Continue with review of final opposition with statement of undisputed facts of related response to undisputed facts (1.7). | 450.00 | 1.70 | 765.00 |
| | JAB | Review of exhibit to plaintiff's opposition on brief final on defendant's motion for summary judgement (1.0). | 450.00 | 1.00 | 450.00 |
| 10/24/2017 | SJS | Initial research regarding [REDACTED] | 350.00 | 0.60 | 210.00 |
| | SJS | Review court docket and court minute orders. | 350.00 | 0.40 | 140.00 |
| | SJS | Call law clerk for status of minute order. | 350.00 | 0.10 | 35.00 |
| | SJS | Review of filings from G. West to oppose motion for summary judgment. | 350.00 | 1.40 | 490.00 |
| 10/25/2017 | SJS | [REDACTED] | 350.00 | 0.10 | 35.00 |
| | SJS | Review plaintiff's ex parte application to extend page length. | 350.00 | 0.40 | 140.00 |
| | SJS | Review notices of non- opposition. | 350.00 | 0.60 | 210.00 |
| | SJS | Draft motion to strike fugitive documents. | 350.00 | 2.10 | 735.00 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.00 |
| | SJS | [REDACTED] RE:: [REDACTED] | 350.00 | 0.90 | 315.00 |
| | SJS | Draft Opposition to application to extend page limit. | 350.00 | 1.40 | 490.00 |
| | SJS | Begin review of documents filed by G. West. | 350.00 | 0.90 | 315.00 |
| | JAB | [REDACTED] (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of plaintiff's ex parte application and response page limitations to opposition briefs (.4) | 450.00 | 0.40 | 180.00 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Review of email communication between counsel (.4). | 450.00 | 0.40 | 180.00 |

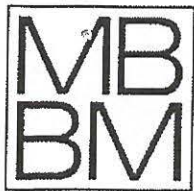
| | | <u>Rate</u> | <u>Hours</u> | |
|------------|--|-------------|--------------|-----------|
| | JAB Preparation of motion of non-opposition to defendants motion exclude expert (.4). | 450.00 | 0.40 | 180.00 |
| | JAB Preparation of notices of non-opposition to all four of defendant's motions in limine #1 through #4 (.4). | 450.00 | 0.40 | 180.00 |
| 10/26/2017 | SJS Review plaintiff's objection to notices. | 350.00 | 0.20 | 70.00 |
| | SJS Review email exchange with J. Bendavid and G. West. | 350.00 | 0.40 | 140.00 |
| | SJS Review notices of non opposition and filing confirmation. | 350.00 | 0.30 | 105.00 |
| | SJS [REDACTED] | 350.00 | 0.20 | 70.00 |
| | SJS Draft order granting motion to continue. | 350.00 | 0.30 | 105.00 |
| | SJS Draft response to objection. | 350.00 | 0.90 | 315.00 |
| | SJS [REDACTED] | 350.00 | 0.60 | 210.00 |
| | SJS [REDACTED] | 350.00 | 0.40 | 140.00 |
| | SJS Draft revisions. | 350.00 | 0.30 | 105.00 |
| | SJS Supplemental revisions to response to objection. | 350.00 | 1.10 | 385.00 |
| | SJS Continued review of documents for reply brief. | 350.00 | 0.90 | 315.00 |
| | SJS [REDACTED] | 350.00 | 1.30 | 455.00 |
| | SJS Review of exhibits. | 350.00 | 0.90 | 315.00 |
| | JAB Exchange email communication with counsel (.2). | 450.00 | 0.20 | 90.00 |
| | JAB Receive and review of plaintiff's objections to final notices (5) of non-opposition of numerous motions filed by Defendant (.8). | 450.00 | 0.80 | 360.00 |
| | JAB Review of needed to files to strike and oppose (.6). | 450.00 | 0.60 | 270.00 |
| | | | 132.70 | 48,665.00 |

Expenses

| | | | |
|------------|--|--|-------|
| 09/11/2017 | Clark County Clerk | | |
| | 147789 Motion for Protective Order on Order Shortening Time (mlf) | | 3.5 |
| 09/26/2017 | Clark County Clerk | | |
| | 1545128 Opposition to Motion to Compel Unqualified Responses (mlf) | | 3.5 |
| 09/29/2017 | Clark County Clerk | | |
| | 1568583 Motion in Limine to Exclude Report (mlf) | | 3.5 |
| 09/30/2017 | Lexis/ Nexis | | 142.1 |
| 09/30/2017 | Lexis/ Nexis | | 144.8 |
| 10/02/2017 | Clark County Clerk | | |
| | 1573968 Motion for Summary Judgment (mlf) | | 209.5 |
| 10/02/2017 | Clark County Clerk | | |
| | 1574568 Motion in Limine No. 1 (mlf) | | 3.5 |
| 10/02/2017 | Clark County Clerk | | |
| | 1574706 Motion in Limine No. 2 (mlf) | | 3.5 |
| 10/02/2017 | Clark County Clerk | | |
| | 1574788 Motion in Limine No. 3 (mlf) | | 3.5 |
| 10/02/2017 | Clark County Clerk | | |
| | 1574839 Motion in Limine No. 4 (mlf) | | 3.5 |
| 10/03/2017 | Clark County Clerk | | |
| | 1579970 Motion to Continue Trial (mlf) | | 3.5 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | |
|------------|--|--------------------------|
| 10/12/2017 | Clark County Clerk | |
| | 1625139 Trial Subpoena (mlf) | 3.0 |
| 10/13/2017 | Clark County Clerk | |
| | 1631171 Limited Opposition to Motion to Continue Trial (mlf) | 3.0 |
| | Total Expenses | 531.0 |
| | Total amount of this bill | 49,196.0 |
| | Previous Balance | \$70,339.7 |
| | <u>Payments</u> | |
| 11/08/2017 | Payment ck#126514 | -26,230.4 |
| | Please Remit Balance Due | <u>\$93,305.2</u> |



MORAN BRANDON
BENDAVID MORAN
ATTORNEYS AT LAW

JOHN T. MORAN, JR.
LEW BRANDON, JR.
JEFFERY A. BENDAVID
J.T. MORAN III
JUSTIN W. SMERBER

ADAM S. DAVIS
MATTHEW B. SIBERT
KRIS D. KLINGENSMITH
MATTHEW D. WHITTAKER
STEPHANIE J. SMITH

ATTN: Toni Naidoo
toni@saharalasvegas.net

Page:
December 05, 2017
Account No: 12386-005
Statement No: 18914

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | <u>Rate</u> | <u>Hours</u> | |
|------------|-----|---|-------------|--------------|--------|
| 10/27/2017 | JAB | Exchange of email communication with counsel (.3). | 450.00 | 0.30 | 135.00 |
| 10/29/2017 | SJS | Read, review and analysis of opposition to motion for summary judgment filings. | 350.00 | 1.40 | 490.00 |
| 10/30/2017 | JAB | Review, edit and revise of draft opposition to plaintiff's motion to extend briefing of motion for summary judgment (.8). | 450.00 | 0.80 | 360.00 |
| | SJS | Review discovery commissioner report and recommendations served. | 350.00 | 0.20 | 70.00 |
| | SJS | Review and edit opposition to application to extend page limit. | 350.00 | 0.60 | 210.00 |
| | SJS | [REDACTED] | 350.00 | 0.70 | 245.00 |
| | SJS | Draft reply brief in support of motion for summary judgment. | 350.00 | 1.70 | 595.00 |
| | SJS | Supplemental drafting of reply in support of motion for summary judgment. | 350.00 | 2.10 | 735.00 |
| | SJS | Supplemental review of opposition to motion for summary judgment. | 350.00 | 1.80 | 630.00 |
| | SJS | [REDACTED] | 350.00 | 0.70 | 245.00 |
| 10/31/2017 | JAB | Exchange email communication with court and counsel (.2). | 450.00 | 0.20 | 90.00 |
| | JAB | Review of updates from court to hearing (.2). | 450.00 | 0.20 | 90.00 |
| | SJS | Research and review of [REDACTED] | 350.00 | 2.30 | 805.00 |
| | SJS | Supplemental review of all briefing submitted by Plaintiff and exhibits. | 350.00 | 1.80 | 630.00 |
| | SJS | [REDACTED] | 350.00 | 1.20 | 420.00 |
| | SJS | Supplemental review and drafting of reply brief. | 350.00 | 1.90 | 665.00 |
| | SJS | Drafting of motion to strike Declaration of R. Avellini attached to opposition. | 350.00 | 1.10 | 385.00 |
| 11/01/2017 | JAB | Review, edit of opposition brief (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | [REDACTED] (.6). | 450.00 | 0.60 | 270.00 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | <u>Rate</u> | <u>Hours</u> | |
|------------|-----|--|-------------|--------------|--------|
| | SJS | [REDACTED] | 350.00 | 2.10 | 735.00 |
| | SJS | [REDACTED] | 350.00 | 1.90 | 665.00 |
| | SJS | Supplemental drafting of reply brief. | 350.00 | 1.70 | 595.00 |
| 11/02/2017 | JAB | Review, edit and revise of response to plaintiff's objection to defendants notice of non-opposition (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Review, edit and revise of motion to strike plaintiff's expert declaration in support of opposition to motion for summary judgment (1.2). | 450.00 | 1.20 | 540.00 |
| | JAB | Finalize motion on order shortening time to strike fugitive pleadings (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Finalize motion to strike expert declaration (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Review, edit and revise of motion to strike plaintiff's fugitive pleadings both separate statement of disputed and undisputed facts (1.0). | 450.00 | 1.00 | 450.00 |
| | JAB | Finalize response to plaintiff's objection to non-opposition files and related declaration (.8). | 450.00 | 0.80 | 360.00 |
| | SJS | Review filing verification for response to objection. | 350.00 | 0.10 | 35.00 |
| | SJS | [REDACTED] | 350.00 | 0.90 | 315.00 |
| | SJS | [REDACTED] | 350.00 | 1.70 | 595.00 |
| | SJS | Finalize opposition to application to increase page limitation. | 350.00 | 0.40 | 140.00 |
| | SJS | Supplemental revisions and drafting on motion to strike avellini declaration | 350.00 | 1.40 | 490.00 |
| | SJS | [REDACTED] | 350.00 | 1.10 | 385.00 |
| | SJS | Draft additional motions to strike revisions for R. Avellini and Opposition to ex parte. | 350.00 | 0.30 | 105.00 |
| 11/03/2017 | JAB | Review, edit and revise of draft reply brief to plaintiff's opposition to defendant's motion for summary judgment (1.7). | 450.00 | 1.70 | 765.00 |
| | JAB | Review, edit and revise reply to defendant's motion for summary judgment (1.2). | 450.00 | 1.20 | 540.00 |
| | JAB | Receive and review of plaintiff's reply to defendant's opposition to plaintiff's application to increase page limitation (.4). | 450.00 | 0.40 | 180.00 |
| | JAB | Review of issues relation to pending motions (.8). | 450.00 | 0.80 | 360.00 |
| | SJS | Revise and edit reply for motion for summary judgment. | 350.00 | 1.20 | 420.00 |
| | SJS | Finalize other motions to strike fugitive documents and declaration of R. Avellini. | 350.00 | 1.80 | 630.00 |
| | SJS | Prepare and finalize exhibits for reply brief in support of motion for summary judgment. | 350.00 | 1.90 | 665.00 |
| | SJS | Review filings and submissions for motion for summary judgment hearing date and Order shortening time. | 350.00 | 0.40 | 140.00 |
| 11/06/2017 | SJS | Review filing notices and order filed by G. West. | 350.00 | 0.50 | 175.00 |
| | SJS | Review emails from C. Friedberg RE:: motions in limine stipulation. | 350.00 | 0.30 | 105.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| | SJS | Review revised motion in limine stipulation. | 350.00 | 0.30 | 105.00 |
| | SJS | Review OSTs and filings of additional motions to strike. | 350.00 | 0.40 | 140.00 |
| | JAB | Receive and review os signed order (.2). | 450.00 | 0.20 | 90.00 |
| | JAB | Review of issues with filings (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of opposition brief form plaintiff to motion to strike fugitive documents (.8). | 450.00 | 0.80 | 360.00 |
| 11/07/2017 | SJS | Preliminary review of oppositions filed by G. West to motions to strike. | 350.00 | 0.60 | 210.00 |
| 11/08/2017 | SJS | [REDACTED] | 350.00 | 1.80 | 630.00 |
| | SJS | Review of motions set for hearing on Nov. 9 RE:: to strike | 350.00 | 1.20 | 420.00 |
| | JAB | Receive and review of minute order for district court (.2). | 450.00 | 0.20 | 90.00 |
| | JAB | [REDACTED] (1.8). | 450.00 | 1.80 | 810.00 |
| | JAB | [REDACTED] (2.3). | 450.00 | 2.30 | 1,035.00 |
| | JAB | [REDACTED] (1.5). | 450.00 | 1.50 | 675.00 |
| 11/09/2017 | SJS | Review motions to strike and motion for summary judgment for hearing. | 350.00 | 2.20 | 770.00 |
| | SJS | Attend hearing on motion for summary judgment. | 350.00 | 1.80 | 630.00 |
| | SJS | Attend hearing on motion for summary judgment continued by judge. | 350.00 | 2.10 | 735.00 |
| | SJS | [REDACTED] | 350.00 | 0.30 | 105.00 |
| | JAB | [REDACTED] | 450.00 | 1.70 | 765.00 |
| | JAB | Attend hearing in district court on motion for summary judgement (1.8). | 450.00 | 1.80 | 810.00 |
| | JAB | Continue attending haring in district court on motion for summary judgement (2.0). | 450.00 | 2.00 | 900.00 |
| 11/13/2017 | SJS | Review filings from opposing counsel. | 350.00 | 0.30 | 105.00 |
| | JAB | Receive and review of plaintiff's motion to exclude plaintiff's expert report on testing (1.5). | 450.00 | 1.50 | 675.00 |
| | JAB | Review and exchange email communication with counsel (.3). | 450.00 | 0.30 | 135.00 |
| | JAB | Receive and review of plaintiff opposition to defendants motion in Limine to exclude any reference discussion or testing of plaintiff's opinion regarding frame damage (.8). | 450.00 | 0.80 | 360.00 |
| | JAB | Receive and review of plaintiffs opposition to defendants motion in Limine to exclude any witnesses not disclosed in discovery (1.0). | 450.00 | 1.00 | 450.00 |
| | SJS | Read and review plaintiff's opposition to motion in limine to strike expert rocco avellini. | 350.00 | 1.90 | 665.00 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|-------|
| | SJS | Read and review plaintiff's opposition to motion in limine to exclude references or testimony RE:: plaintiff's opinion on frame damage. | 350.00 | 1.20 | 420.0 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.0 |
| | SJS | Read and review opposition to Defendant's motion in limine to exclude reference or testimony of all consumer expectations. | 350.00 | 1.30 | 455.0 |
| | SJS | Read and review plaintiff's opposition to defendant's motion in limine to exclude witnesses not disclosed previously. | 350.00 | 1.10 | 385.0 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.0 |
| 11/14/2017 | JAB | Receive and review of plaintiff opposition to defendants motion in limine to exclude any reference discussion, testimony and evidence of general expectation of al consumers (1.0). | 450.00 | 1.00 | 450.0 |
| | JAB | Receive and review of plaintiffs opposition to defendants motion in Limine to exclude an reference discussion, testimony or evidence, expectations of all consumers (1.0). | 450.00 | 1.00 | 450.0 |
| | SJS | [REDACTED] | 350.00 | 1.60 | 560.0 |
| | SJS | Commence drafting reply brief to motion to strike avellini. | 350.00 | 1.70 | 595.0 |
| | SJS | [REDACTED] | 350.00 | 0.90 | 315.0 |
| 11/15/2017 | SJS | Continued drafting of reply brief to motion to strike avellini. | 350.00 | 2.10 | 735.0 |
| | SJS | Continued drafting of reply brief for striking avellini. | 350.00 | 1.40 | 490.0 |
| | SJS | Supplemental drafting of reply brief to strike Avellini. | 350.00 | 1.40 | 490.0 |
| | SJS | Continued preparation of reply brief to strike avellini. | 350.00 | 1.40 | 490.0 |
| 11/16/2017 | JAB | [REDACTED] (.6). | 450.00 | 0.60 | 270.0 |
| | SJS | [REDACTED] | 350.00 | 1.80 | 630.0 |
| | SJS | [REDACTED] | 350.00 | 1.40 | 490.0 |
| | SJS | Draft order regarding motions to strike. | 350.00 | 0.30 | 105.0 |
| | SJS | Revise order regarding motions to strike. | 350.00 | 0.20 | 70.0 |
| | SJS | Supplemental revisions to reply brief to strike avellini. | 350.00 | 1.90 | 665.0 |
| 11/17/2017 | SJS | [REDACTED] | 350.00 | 1.70 | 595.0 |
| | SJS | Draft reply brief for motion in limine to preclude witnesses. | 350.00 | 2.30 | 805.0 |
| | SJS | Supplemental drafting of reply brief for motion to strike avellini. | 350.00 | 2.20 | 770.0 |
| | SJS | [REDACTED] | 350.00 | 1.20 | 420.0 |
| 11/20/2017 | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.0 |
| 11/27/2017 | SJS | Read and review decision and order. | 350.00 | 0.50 | 175.0 |
| | SJS | [REDACTED] | 350.00 | 0.20 | 70.0 |
| | SJS | Telephone call to judge chambers RE:: notice of entry of order. | 350.00 | 0.20 | 70.0 |
| | JAB | Receive and review of Decision and Order (.3). | 450.00 | 0.30 | 135.0 |
| | JAB | [REDACTED] (.8). | 450.00 | 0.80 | 360.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | Rate | Hours | |
|------------|---|--------|--------|----------|
| | SJS Review decision rules for summary judgment. | 350.00 | 0.30 | 105.0 |
| | SJS [REDACTED] | 350.00 | 0.40 | 140.0 |
| 11/28/2017 | JAB [REDACTED] | 450.00 | 0.30 | 135.0 |
| | JAB Receive and review of correspondence from George West (.2). | 450.00 | 0.20 | 90.0 |
| | SJS Review and analyze order and execute. | 350.00 | 0.30 | 105.0 |
| | SJS [REDACTED] | 350.00 | 0.30 | 105.0 |
| | SJS Review transcript invoices for costs. | 350.00 | 0.30 | 105.0 |
| | SJS [REDACTED] | 350.00 | 0.70 | 245.0 |
| | SJS Exchange emails with G. West RE:; order. | 350.00 | 0.30 | 105.0 |
| 11/29/2017 | SJS Draft Notice of Entry of Order for decision. | 350.00 | 0.20 | 70.0 |
| | SJS Telephone call with clerk of Judge Allif. | 350.00 | 0.20 | 70.0 |
| | SJS Draft verified cost memorandum. | 350.00 | 0.60 | 210.0 |
| | SJS [REDACTED] | 350.00 | 0.40 | 140.0 |
| | | | 116.30 | 44,145.0 |

Expenses

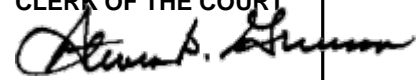
| | | |
|------------|--|---------|
| 08/23/2017 | Western Reporting Services, Inc. Inv# 51944 | 754.0 |
| 09/25/2017 | Western Reporting Services, Inc. Inv# 52025 | 3,035.5 |
| 10/25/2017 | Clark County Clerk 1682253 Notice Non Opposition to Motion in Limine (mlf) | 3.5 |
| 10/25/2017 | Clark County Clerk 1682578 Notice of Non Opposition to Motion in Limine No 1. (mlf) | 3.5 |
| 10/25/2017 | Clark County Clerk 1682603 Notice of Non Opposition to Motion in Limine No. 2 (mlf) | 3.5 |
| 10/25/2017 | Clark County Clerk 1682623 Notice of Non Opposition to Motion in Limine No. 3 (mlf) | 3.5 |
| 10/25/2017 | Clark County Clerk 1682644 Notice of Non Opposition to Motion in Limine No. 4 (mlf) | 3.5 |
| 10/31/2017 | Lexis/ Nexis | 41.2 |
| 10/31/2017 | Photocopy charges | 0.4 |
| 10/31/2017 | Postage | 6.4 |
| 11/02/2017 | Clark County Clerk 1713770 Opposition to Ex Parte Application (mlf) | 3.5 |
| 11/02/2017 | Clark County Clerk 1715459 Response to Objection to Notices of Non Opposition(mlf) | 3.5 |
| 11/03/2017 | Clark County Clerk 1719732 Reply in Support of Motion for Summary Judgment (mlf) | 3.5 |
| 11/03/2017 | Clark County Clerk 1720351 Motion to Strike Declaration of Rocco Avellini (mlf) | 3.5 |
| 11/03/2017 | Clark County Clerk 1720396 Motion to Strike Fugitive Documents (mlf) | 3.5 |
| 11/14/2017 | Lawyers Process Service Invoice # 43868 | 50.0 |

Sahara Chrysler Jeep Dodge adv. Derrick Poole

| | | |
|------------|---------------------------------|----------------------------|
| 12/05/2017 | Thomas Lepper Associates | |
| | Inv# 1607R10-1 | 1,482.00 |
| | Total Expenses | 5,405.00 |
| | Total amount of this bill | 49,550.00 |
| | Previous Balance | \$93,305.00 |
| | Please Remit Balance Due | <u>\$142,855.00</u> |

 ORIGINAL

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Steven D. Grierson
CLERK OF THE COURT



ORDR

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Law Offices of George O. West III
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Fax: (702) 946-0887
Email: attcbf@cox.net
Website: www.consumerlaw.justia.net

Attorneys for Plaintiffs
DERRICK POOLE

DISTRICT COURT
CLARK COUNTY, NEVADA

DERRICK POOLE,

Plaintiff,

v

NEVADA AUTO DEALERSHIP INVEST-
MENTS LLC a Nevada Limited Liability
Company d/b/a SAHARA CHRYSLER,
JEEP, DODGE, WELLS FARGO DEALER
SERVICES INC., COREPOINTE INSUR-
ANCE COMPANY, and DOES 1 through 100,
Inclusive,

Defendants,

CASE NO : A-16-737120-C
DEPT : XXVII

**ORDER GRANTING, IN PART,
DEFENDANT'S MOTION FOR FEES
AND COSTS AND ORDER GRANTING
IN PART, PLAINTIFF'S MOTION
TO RETAX COSTS**

1 Defendant, Nevada Auto Dealership Investments LLC d/b/a Sahara Chrysler
2 Jeep Dodge Ram's ("Defendant" and/or "Sahara Chrysler") Motion for Attorneys' Fees
3 and Costs and Plaintiff, Derrick Poole's ("Plaintiff" and/or "Poole") Motion to Retax
4 Costs having come on for hearing before this above-entitled Court on February 1,
5 2018, at 9:30 a.m., with the Honorable Judge Nancy Allf presiding, with Stephanie J.
6 Smith, Esq., appearing on behalf of the Defendants, Sahara Chrysler and Corepointe
7 Insurance, and George O. West III, Esq. and Craig Friedberg, Esq., appearing on
8 behalf of Plaintiff, Derrick Poole. The Court having reviewed all of the papers and
9 pleadings on file herein, and arguments of counsel, finds therefore:

11 THE COURT FINDS that Defendant's motion for fees based upon NRS
12 18.010(2)(b) is denied, as Plaintiff's Complaint was not groundless or made to harass
13 Defendants. However, Defendant's motion for fees based upon NRCP Rule 68,
14 Defendants' Motion is granted, in part. The Court finds that attorneys' fees and costs
15 are appropriate pursuant to the applicable factors under *Beattie*. More specifically the
16 Court finds that while Plaintiff Derrick Poole's claims were not brought in bad faith,
17 the Defendant's offer of judgment was reasonable in its timing and amount, that
18 Plaintiff's rejection of the offer of judgment was grossly unreasonable due to the
19 timing and amount, and, except for what is specifically noted herein below, that the
20 attorneys' fees incurred by Defendant between October 5, 2017 and November 29,
21 2017, were reasonable due to the amount of time spent on the sophisticated defense,
22 the hourly rates and skill of the attorneys, and the results obtained.

25 The Court hereby, denies in part, Defendant's requested fees pursuant to Rule
26 68 in the total amount of \$20,760.00. These reductions are as follows: \$18,500.00
27 for redacted billing entries, \$940.00 for a motion that was prepared but not filed,
28 \$270.00 for a duplicate time entry on page²₃₅ of the Plaintiff's bates numbered copy

1 of Defendant's itemized billing, and \$1,050.00 for time billed for reviewing trial
2 subpoenas.

3 IT IS HEREBY ORDERED that Defendant, Nevada Auto Dealership
4 Investments LLC d/b/a Sahara Chrysler Jeep Dodge Ram's Motion for Attorneys' Fees
5 is granted, in part, pursuant to NRCP 68, in the amount of \$47,525.00.
6

7 IT IS HEREBY FURTHER ORDERED that Defendant's request for costs is
8 granted, in part, and also Plaintiff, Derrick Poole's Motion to Retax Costs is granted, in
9 part, to the extent that Defendant will only be awarded the statutory maximum
10 amount for costs for its own expert's fees pursuant to NRS 18.005, thereby reducing
11 its expert costs from \$3,326.51 to \$1,500.00, therefore Defendant shall be awarded
12 costs in the amount of \$9,402.82.

13 IT IS ALSO HEREBY ORDERED, that the documents submitted at the hearing
14 by Plaintiff's counsel, which were given to Defendant's counsel at the hearing, and
15 admitted by the Court over the objection of Defendant's counsel, shall also be deemed
16 part of the record and were accepted by the Court and identified on the record as
17 "Court's Exhibit." This included the same itemized billing statement produced by
18 Defendant in their reply brief, but wherein bates numbered and colored highlights
19 were added by Plaintiff's counsel.
20

21 DATED this 6 day of March, 2018.
22

23 Nancy L. Alf
24 DISTRICT COURT JUDGE
25 *ALF*
26
27
28

1
2 Submitted by :

3 By

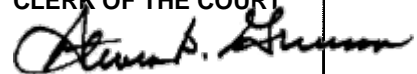
4 GEORGE O. WEST III

5 *Consumer Attorneys Against Auto Fraud*

6 Law Offices of George O. West III

7 Attorney for Plaintiff

8 **DERRICK POOLE**



1 **NEO**
2 **JEFFERY A. BENDAVID, ESQ.**
3 Nevada Bar No. 6220
4 **STEPHANIE J. SMITH, ESQ.**
5 Nevada Bar No. 11280
6 **MORAN BRANDON BENDAVID MORAN**
7 630 South 4th Street
8 Las Vegas, Nevada 89101
9 (702) 384-8424
10 j.bendavid@moranlawfirm.com
11 s.smith@moranlawfirm.com
12 *Attorney for Defendants, Nevada Auto*
13 *Dealership Investments LLC d/b/a Sahara*
14 *Chrysler and Corepointe Insurance Co.*

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

12 DERRICK POOLE,
13
14 Plaintiff,

15 v.

16 NEVADA AUTO DEALERSHIP
17 INVESTMENTS LLC, a Nevada Limited
18 Liability Company d/b/a SAHARA
19 CHRYSLER; JEEP, DODGE, WELLS
20 FARGO DEALER SERVICES INC.,
21 COREPOINTE INSURANCE
22 COMPANY; and DOES 1 through 100,
23 Inclusive,

24 Defendant.

Case No.: A-16-737120-C
Dept. No.: XXVII

NOTICE OF ENTRY OF ORDER

23 Please take notice that an ORDER GRANTING, IN PART, DEFENDANT'S
24 MOTION FOR FEES AND COSTS AND ORDER GRANTING IN PART, PLAINTIFF'S
25 MOTION TO RETAX COSTS was entered in the above entitled case by the Honorable
26 Nancy L. Allf on the 9th day of March, 2018.



MORAN BRANDON
BENDAVID MORAN
ATTORNEYS AT LAW

630 SOUTH 4TH STREET
LAS VEGAS, NEVADA 89101
PHONE: (702) 384-8424
FAX: (702) 384-6568

JOINT APPENDIX 1398

1 A TRUE AND CORRECT COPY of the above referenced document is attached.

2 DATED this 20th day of March, 2018.

3 **MORAN BRANDON BENDAVID MORAN**

4
5 /s/ Jeffery A. Bendavid

6 **JEFFERY A. BENDAVID, ESQ.**

7 Nevada Bar No. 6220

8 **STEPHANIE J. SMITH, ESQ.**

9 630 South 4th Street

10 Las Vegas, Nevada 89101

11 *Attorney for Defendants, Nevada Auto*

12 *Dealership Investments LLC d/b/a Sahara*

13 *Chrysler and Corepointe Insurance Co.*



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Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

ORDR

GEORGE O. WEST III [SBN 7951]
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Email: attcbf@cox.net
Website: www.consumerlaw.justia.net

Attorneys for Plaintiffs
DERRICK POOLE

DISTRICT COURT
CLARK COUNTY, NEVADA

DERRICK POOLE,

Plaintiff,

v

NEVADA AUTO DEALERSHIP INVEST-
MENTS LLC a Nevada Limited Liability
Company d/b/a SAHARA CHRYSLER,
JEEP, DODGE, WELLS FARGO DEALER
SERVICES INC., COREPOINTE INSUR-
ANCE COMPANY, and DOES 1 through 100,
Inclusive,

Defendants,

CASE NO : A-16-737120-C
DEPT : XXVII

**ORDER GRANTING, IN PART,
DEFENDANT'S MOTION FOR FEES
AND COSTS AND ORDER GRANTING
IN PART, PLAINTIFF'S MOTION
TO RETAX COSTS**

1 Defendant, Nevada Auto Dealership Investments LLC d/b/a Sahara Chrysler
2 Jeep Dodge Ram's ("Defendant" and/or "Sahara Chrysler") Motion for Attorneys' Fees
3 and Costs and Plaintiff, Derrick Poole's ("Plaintiff" and/or "Poole") Motion to Retax
4 Costs having come on for hearing before this above-entitled Court on February 1,
5 2018, at 9:30 a.m., with the Honorable Judge Nancy Alf presiding, with Stephanie J.
6 Smith, Esq., appearing on behalf of the Defendants, Sahara Chrysler and Corepointe
7 Insurance, and George O. West III, Esq. and Craig Friedberg, Esq., appearing on
8 behalf of Plaintiff, Derrick Poole. The Court having reviewed all of the papers and
9 pleadings on file herein, and arguments of counsel, finds therefore:
10

11 THE COURT FINDS that Defendant's motion for fees based upon NRS
12 18.010(2)(b) is denied, as Plaintiff's Complaint was not groundless or made to harass
13 Defendants. However, Defendant's motion for fees based upon NRCP Rule 68,
14 Defendants' Motion is granted, in part. The Court finds that attorneys' fees and costs
15 are appropriate pursuant to the applicable factors under *Beattie*. More specifically the
16 Court finds that while Plaintiff Derrick Poole's claims were not brought in bad faith,
17 the Defendant's offer of judgment was reasonable in its timing and amount, that
18 Plaintiff's rejection of the offer of judgment was grossly unreasonable due to the
19 timing and amount, and, except for what is specifically noted herein below, that the
20 attorneys' fees incurred by Defendant between October 5, 2017 and November 29,
21 2017, were reasonable due to the amount of time spent on the sophisticated defense,
22 the hourly rates and skill of the attorneys, and the results obtained.
23
24

25 The Court hereby, denies in part, Defendant's requested fees pursuant to Rule
26 68 in the total amount of \$20,760.00. These reductions are as follows: \$18,500.00
27 for redacted billing entries, \$940.00 for a motion that was prepared but not filed,
28 \$270.00 for a duplicate time entry on page 35 of the Plaintiff's bates numbered copy

1 of Defendant's itemized billing, and \$1,050.00 for time billed for reviewing trial
2 subpoenas.

3 IT IS HEREBY ORDERED that Defendant, Nevada Auto Dealership
4 Investments LLC d/b/a Sahara Chrysler Jeep Dodge Ram's Motion for Attorneys' Fees
5 is granted, in part, pursuant to NRCP 68, in the amount of \$47,525.00.
6

7 IT IS HEREBY FURTHER ORDERED that Defendant's request for costs is
8 granted, in part, and also Plaintiff, Derrick Poole's Motion to Retax Costs is granted, in
9 part, to the extent that Defendant will only be awarded the statutory maximum
10 amount for costs for its own expert's fees pursuant to NRS 18.005, thereby reducing
11 its expert costs from \$3,326.51 to \$1,500.00, therefore Defendant shall be awarded
12 costs in the amount of \$9,402.82.

13 IT IS ALSO HEREBY ORDERED, that the documents submitted at the hearing
14 by Plaintiff's counsel, which were given to Defendant's counsel at the hearing, and
15 admitted by the Court over the objection of Defendant's counsel, shall also be deemed
16 part of the record and were accepted by the Court and identified on the record as
17 "Court's Exhibit." This included the same itemized billing statement produced by
18 Defendant in their reply brief, but wherein bates numbered and colored highlights
19 were added by Plaintiff's counsel.
20

21 DATED this 6 day of March, 2018.
22

23 Nancy L. Alf
24 DISTRICT COURT JUDGE
25 *ALF*
26
27
28

Submitted by :

By

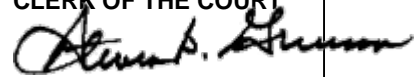
GEORGE O. WEST III

Consumer Attorneys Against Auto Fraud

Law Offices of George O. West III

Attorney for Plaintiff

DERRICK POOLE



JDGMT
JEFFERY A. BENDAVID, ESQ.
Nevada Bar No. 6220
STEPHANIE J. SMITH, ESQ.
Nevada Bar No. 11280
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s.smith@moranlawfirm.com
*Attorney for Defendants, Nevada Auto
Dealership Investments LLC d/b/a Sahara
Chrysler and Corepointe Insurance Co.*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

DERRICK POOLE,

Plaintiff,

v.

NEVADA AUTO DEALERSHIP
INVESTMENTS LLC, a Nevada Limited
Liability Company d/b/a SAHARA
CHRYSLER; JEEP, DODGE, WELLS
FARGO DEALER SERVICES INC.,
COREPOINTE INSURANCE
COMPANY; and DOES 1 through 100,
Inclusive,

Defendant.

Case No.: A-16-737120-C
Dept. No.: XXVII

JUDGMENT

Defendant, Nevada Auto Dealership Investments LLC d/b/a Sahara Chrysler Jeep
Dodge Ram's ("Defendant" and/or "Sahara Chrysler") Motion for Attorneys' Fees and
Costs and Plaintiff, Derrick Poole's ("Plaintiff" and/or "Poole") Motion to Retax Costs
having come on for hearing before this above-entitled and an Order granting, in part, the
Motion for Attorneys' Fees and Costs and finding against Plaintiff and in favor of



MORAN BRANDON
BENDAVID MORAN
ATTORNEYS AT LAW

630 SOUTH 4TH STREET
LAS VEGAS, NEVADA 89101
PHONE: (702) 384-8424
FAX: (702) 384-6568

1 Defendant being entered on March 20, 2018, the Court hereby FINDS, ORDERS AND
2 DECREES that:

3 Final and binding judgment is entered in favor of Nevada Auto Dealership
4 Investments d/b/a Sahara Chrysler Jeep Dodge Ram and against Plaintiff, Derrick Poole in
5 the total amount of \$56,927.82 as of the 20th day of March, 2018.
6

7
8 DATED this 23 day of March, 2018.
9

10 Nancy L Alf
11 DISTRICT COURT JUDGE
12 *or*

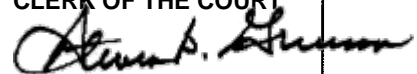
13 Respectfully Submitted:
14 **MORAN BRANDON BENDAVID MORAN**

15 /s/Jeffery A. Bendavid
16 **JEFFERY A. BENDAVID, ESQ.**
17 Nevada Bar No. 6220
18 **STEPHANIE J. SMITH, ESQ.**
19 Nevada Bar No. 11280
20 630 South 4th Street
21 Las Vegas, Nevada 89101
22 (702) 384-8424
23 Fax: (702) 384-6568
24 j.bendavid@moranlawfirm.com
25 s.smith@moranlawfirm.com
26 *Attorney for Defendants, Nevada Auto*
27 *Dealership Investments LLC d/b/a Sahara*
28 *Chrysler and Corepointe Insurance Co.*



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1 **NEO**
2 **JEFFERY A. BENDAVID, ESQ.**
3 Nevada Bar No. 6220
4 **STEPHANIE J. SMITH, ESQ.**
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12 *Attorney for Defendants, Nevada Auto*
13 *Dealership Investments LLC d/b/a Sahara*
14 *Chrysler and Corepointe Insurance Co.*

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

12 DERRICK POOLE,

13 Plaintiff,

14 v.

15 NEVADA AUTO DEALERSHIP
16 INVESTMENTS LLC, a Nevada Limited
17 Liability Company d/b/a SAHARA
18 CHRYSLER; JEEP, DODGE, WELLS
19 FARGO DEALER SERVICES INC.,
20 COREPOINTE INSURANCE
21 COMPANY; and DOES 1 through 100,
22 Inclusive,

21 Defendant.

Case No.: A-16-737120-C
Dept. No.: XXVII

23 **NOTICE OF ENTRY OF JUDGMENT**

24
25 Please take notice that a JUDGMENT was entered in the above entitled case on the
26 28th day of March, 2018.



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BENDAVID MORAN
ATTORNEYS AT LAW

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FAX: (702) 384-6568

1 A TRUE AND CORRECT COPY of the above Judgment is attached hereto.

2 DATED this 28th day of March, 2018.

3 **MORAN BRANDON BENDAVID MORAN**

4
5
6 /s/ Jeffery A. Bendavid

7 **JEFFERY A. BENDAVID, ESQ.**

8 Nevada Bar No. 6220

9 **STEPHANIE J. SMITH, ESQ.**

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11 Las Vegas, Nevada 89101

12 *Attorney for Defendants, Nevada Auto*

13 *Dealership Investments LLC d/b/a Sahara*

14 *Chrysler and Corepointe Insurance Co.*



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Dealership Investments LLC d/b/a Sahara
Chrysler and Corepointe Insurance Co.*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

DERRICK POOLE,

Plaintiff,

v.

NEVADA AUTO DEALERSHIP
INVESTMENTS LLC, a Nevada Limited
Liability Company d/b/a SAHARA
CHRYSLER; JEEP, DODGE, WELLS
FARGO DEALER SERVICES INC.,
COREPOINTE INSURANCE
COMPANY; and DOES 1 through 100,
Inclusive,

Defendant.

Case No.: A-16-737120-C
Dept. No.: XXVII

JUDGMENT

Defendant, Nevada Auto Dealership Investments LLC d/b/a Sahara Chrysler Jeep
Dodge Ram's ("Defendant" and/or "Sahara Chrysler") Motion for Attorneys' Fees and
Costs and Plaintiff, Derrick Poole's ("Plaintiff" and/or "Poole") Motion to Retax Costs
having come on for hearing before this above-entitled and an Order granting, in part, the
Motion for Attorneys' Fees and Costs and finding against Plaintiff and in favor of



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1 Defendant being entered on March 20, 2018, the Court hereby FINDS, ORDERS AND
2 DECREES that:

3 Final and binding judgment is entered in favor of Nevada Auto Dealership
4 Investments d/b/a Sahara Chrysler Jeep Dodge Ram and against Plaintiff, Derrick Poole in
5 the total amount of \$56,927.82 as of the 20th day of March, 2018.
6

7
8 DATED this 23 day of March, 2018.

9
10 Nandi L Alf
11 DISTRICT COURT JUDGE
12 *or*

13 Respectfully Submitted:
14 **MORAN BRANDON BENDAVID MORAN**

15 /s/Jeffery A. Bendavid
16 **JEFFERY A. BENDAVID, ESQ.**
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24
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27
28



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PROOF OF SERVICE

STATE OF NEVADA)
)
COUNTY OF CLARK)

On June 14, 2018 I served the forgoing document(s) described as 1) **APPELLANT'S APPENDIX** interested party(ies) in this action by either fax and/or email, or by placing a true and correct copy and/or original thereof addressed as follows:

JEFF BENDAVID, ESQ
Moran, Brandon, Bendavid, Moran
630 South Fourth Street
Las Vegas, NV 89101
j.bendavid@moranlawfirm.com

☐ **(BY FIRST CLASS MAIL)** I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal service on that same day with first class postage thereon fully prepaid at Las Vegas, NV in the ordinary course of business.

☐ **(BY PERSONAL SERVICE)** I delivered such envelope by hand to the office, and/or to the attorney listed as the addressee below.

☐ **(BY FAX SERVICE)** Pursuant to consent under NRCP, Rule 5(b), I hereby certify that service of the aforementioned document(s) via facsimile, pursuant to EDCR Rule 7.26(a), as set forth herein.

☒ **(BY EMAIL SERVICE) (Wiznet/email)** Pursuant NRCP, Rule 5(b)(2)(D), and the EDCR on electronic service, I hereby certify that service of the aforementioned document(s) via email to pursuant to the relevant and pertinent provisions of EDCR and NRCP, as set forth herein.

Executed on this 14th day of June, 2018

/s/ George O. West III
GEORGE O. WEST III