

IN THE SUPREME COURT OF THE STATE OF NEVADA

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JENNIFER V. ABRAMS and
THE ABRAMS & MAYO LAW FIRM,

Appellant,

vs.

LOUIS C. SCHNEIDER; LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC; STEVE
W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC;

Respondent.

SC NO: 73838/25834
DC NO: Elizabeth A. Brown
Clerk of Supreme Court

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**APPELLANTS'
INDEX TO
APPENDIX -
DATE ORDER**

**VOLUME VI
Part 2**

Attorneys for Appellant:

Marshal S. Willick, Esq.
Nevada Bar No. 2515
WILICK LAW GROUP
3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110-2101
(702) 438-4100
Email: email@willicklawgroup.com

Dennis L. Kennedy, Esq.
Nevada Bar No. 1462
Joshua P. Gilmore, Esq.
Nevada Bar No. 11576
8984 Spanish Ridge Aveue
Las Vegas, Nevada 89148
(702)562-8820
Email: Dkennedy@BaileyKennedy.com
Jgilmore@BaileyKennedy.com

Attorneys for Respondent:

Maggie McLetchie, Esq.
Nevada Bar No. 10931
MCLETCHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
(702)728-5300
Email: maggie@nvlitigation.com
Attorney for *Sanson Parties*

Joseph W. Houston, Esq.
Nevada Bar No. 1440
430 S. Seventh St.
Las Vegas, Nevada 89101
(702)982-1200
Email: jwh7408@yahoo.com
Attorney for *Schneider Parties*

EXHIBIT 1

1 **DECL**

2 Margaret A. McLetchie, Nevada Bar No. 10931
3 Alina M. Shell, Nevada Bar No. 11711
4 MCLEATCHIE SHELL LLC
5 701 East Bridger Ave., Suite 520
6 Las Vegas, NV 89101
7 Telephone: (702) 728-5300
8 Facsimile: (702) 425-8220
9 Email: maggie@nvlitigation.com
10 *Attorneys for Defendants STEVE W. SANSON*
11 *and VETERANS IN POLITICS INTERNATIONAL, INC.*

8 **EIGHTH JUDICIAL DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 JENNIFER V. ABRAMS and THE
11 ABRAMS & MAYO LAW FIRM,
12 Plaintiff,
13 vs.

Case No.: A-17-749318-C

Dept. No.: XII

14 LOUIS C. SCHNEIDER; LAW OFFICES
15 OF LOUIS C. SCHNEIDER, LLC; STEVE
16 W. SANSON; HEIDI J. HANUSA;
17 CHRISTINA ORTIZ; JOHNNY SPICER;
18 DON WOOLBRIGHT; VETERANS IN
19 POLITICS INTERNATIONAL, INC.;
20 SANSON CORPORATION; KAREN
21 STEELMON; and DOES I THROUGH X,
22 Defendants.

**DECLARATION OF MARGARET
A. MCLEATCHIE IN SUPPORT OF
MOTION FOR ATTORNEY FEES
AND COSTS PURSUANT TO NEV.
REV. STAT. § 41.670**

20 **DECLARATION OF MARGARET A. MCLEATCHIE IN SUPPORT OF MOTION**
21 **FOR ATTORNEY FEES AND COSTS PURSUANT TO NEV. REV. STAT. § 41.670**

22 I, MARGARET A. MCLEATCHIE, declare, pursuant to Nev. Rev. Stat. § 53.330,
23 as follows:

24 1. I have personal knowledge of the facts set forth below, and, if called as a
25 witness, could testify to them.

26 2. I am an attorney duly licensed to practice law in Nevada.

27 3. My firm represents Defendants Steve W. Sanson and Veterans in Politics
28 International, Inc. in this matter. I make this declaration in support of their Motion for

Attorney Fees and Costs Pursuant to Nev. Rev. Stat. § 41.670.

4. On January 27, 2017, the Abrams Parties sent a letter to me demanding the VIPI Defendants preserve “all documents, tangible things and electronically stored information (‘ESI’) potentially relevant to any issues” in the litigation.

5. To respond to the Abrams Parties’ demand, I hired digital forensics expert Ira Victor of Privacy Technician, Inc. to assist with responding to the Abrams Parties’ letter, consult with the VIPI Defendants, and provide services consulting on forensic processes and planning.

6. I also took possession of Mr. Sanson’s hard drive to preserve it during this litigation.

7. Because Mr. Sanson needed access to the files on his hard drive while this matter was being litigated, Mr. Sanson also incurred costs in the amount of \$252.09 to have his hard drive cloned, copied, and reinstalled on his computer.

8. First, at the same time that the Abrams Parties filed suit against the VIPI Defendants, attorney Marshal Willick (who represents the Plaintiffs in this matter) filed a separate suit against the VIPI Defendants in *Marshal S. Willick v. Steve Sanson, et al.*, Case No. A-17-750171-C.

9. To protect the VIPI Defendants’ interests in this case, I was required to monitor the litigation in the *Willick* matter, coordinate with the VIPI Defendants’ counsel in that matter, attend hearings, and monitor and review the papers and pleadings filed therein.

10. As with the *Willick* matter, counsel was required to closely monitor the *Saiter* matter to ensure Mr. Sanson’s interests were adequately protected, and to assess any potential impact the *Saiter* matter would have on the instant case.

11. As with the *Willick* matter, I was required to closely monitor the *Saiter* matter to ensure Mr. Sanson’s interests were adequately protected, and to assess any potential impact the *Saiter* matter would have on the instant case.

12. To meet their burden, I had to conduct extensive research to determine whether each of the statements cited by the Abrams Parties were good faith communications

1 regarding issues of public concern. I was required to watch every complained-of video, and
2 read every complained-of blog posting.

3 13. I was also required to conduct extensive research regarding Nevada and
4 California's Anti-SLAPP laws as well as federal case law interpreting both states' Anti-
5 SLAPP statutes, and draft complex and extensive pleadings. In addition, as discussed above,
6 I was required to retain and consult with a digital forensic expert to respond to Ms. Abrams'
7 ESI preservation letter, and to comply with their obligations to preserve ESI.

8 14. On January 23, 2017, I contacted Ms. Abrams (who at the time was
9 representing herself and the Abrams & Mayo Law Firm in this matter) to notify the Plaintiffs
10 that Defendants intended to file an Anti-SLAPP motion to dismiss, and determine whether
11 Plaintiffs would be willing to stipulate to modify the normal briefing schedule until after the
12 Court ruled on the Anti-SLAPP motion.

13 15. Ms. Abrams initially indicated she was willing to stipulate to a modification
14 of the briefing schedule, and I prepared a proposed stipulation to that effect.

15 16. Ms. Abrams subsequently indicated she and the Abrams & Mayo Law Firm
16 were not willing to stipulate to a modification of the briefing schedule.

17 17. I exercised appropriate billing judgment and structured work on this case to
18 maximize efficiencies, and the hours listed in the fee request are neither duplicative,
19 unnecessary nor excessive.

20 18. To keep billing as low as possible, I utilized a research and writing attorney,
21 a student law clerk, and a paraprofessional to perform tasks such as research and organization
22 to assure that attorneys with higher billing rates were not billing for tasks that lower billers
23 could perform. My law partner, who bills at a lower rate, also worked on this matter.

24 19. Potentially duplicative or unnecessary time has not been included.

25 20. In all these ways, I charged a reasonable rate for the attorneys' time.

26 21. I also exercised appropriate billing judgment by *not* including in this
27 application certain time, even time which would likely be compensable.
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22. The description of costs and fees in this case also excludes all time spent working on this Motion, or as will be necessary to Reply to any Opposition to this Motion.

23. Exhibit 2 is a true and correct copy of the billing in this matter.

24. Exhibit 3 is a true and correct copy of the costs incurred by the VIPI Defendants in this matter.

I certify and declare under the penalty of perjury under the law of the State of Nevada that the foregoing is true and correct, and this declaration was executed at Las Vegas, Nevada, the 12th day of September, 2017.

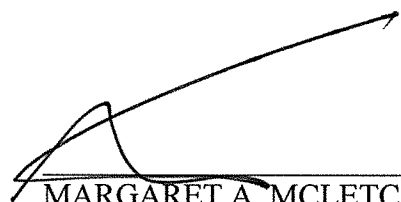

MARGARET A. MCLETSCHIE

EXHIBIT 2

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
1/23/2017	5.7	Margaret McLetchie	\$450.00	Check docket and review and analyze materials. Review compiled research re Anti-SLAPP law procedural issues and begin preparing memo. Emails to opposing counsel. Communications with client.	\$2,565.00
1/23/2017	2.4	Margaret McLetchie	\$450.00	Continue research re Anti-SLAPP statute, review sample motions, and Nevada Supreme Court case law. Research related procedural issues and recent case developments from California.	\$1,080.00
1/23/2017	0.2	Pharan Burchfield	\$150.00	Draft Notice of Appearance to be filed tomorrow after attorney's review.	\$30.00
1/23/2017	0.3	Pharan Burchfield	\$150.00	Organize electronic copy of files/ documents received from Mr. Sanson.	\$45.00
1/24/2017	1	Margaret McLetchie	\$450.00	Call with Ms. Abrams to introduce self, discuss matter, and discuss stipulation to avoid work on 12(b)(5) motion in advance of determination on Anti-SLAPP motion. Attention to drafting of stipulation and follow-up re same.	\$450.00
1/24/2017	1.6	Margaret McLetchie	\$450.00	Further review and analysis of file.	\$720.00
1/24/2017	0.2	Margaret McLetchie	\$450.00	Attention to NOA, IAFD	\$90.00
1/24/2017	0.7	Pharan Burchfield	\$150.00	Draft preservation/freeze letter. Attention to compiling information from client.	\$105.00
1/24/2017	0.3	Pharan Burchfield	\$150.00	Draft Stipulation and [Proposed] Order re extension to file Response to Complaint; email communications with Ms. Abrams re same.	\$45.00
1/24/2017	0.2	Pharan Burchfield	\$150.00	Finalize and file Notice of Appearance; serve/mail re same. Draft and file Initial Appearance Fee Disclosure. Email communications with Mr. Sanson re same.	\$30.00

MCLETCHIE SHELL

Date	Time Expended	Biller	Rate	Description	Total
1/25/2017	0.8	Margaret McLetchie	\$450.00	Edit stipulation and respond to email from Ms. Abrams. Review email refusing to stipulate (change of position); leave message for Ms. Abrams. Review her email response, continuing to refuse to reasonable stipulation and stating that she will not communicate except in email. Review NOA by Mr. Willick and direct staff to communicate with him.	\$360.00
1/25/2017	0.1	Pharan Burchfield	\$150.00	Update Stipulation (substitute Plaintiffs' new counsel information) and email re same to Mr. Willick for review/approval.	\$15.00
1/25/2017	0.2	Pharan Burchfield	\$150.00	Review emails from Mr. Sanson re texts, emails, and videos. Download and save accordingly.	\$30.00
1/26/2017	0.2	Alina Shell	\$350.00	Per Ms. McLetchie's request, review Eighth Judicial District Court Rules regarding motions for extensions of time. Confer with Ms. McLetchie re same.	\$70.00
1/26/2017	0.2	Margaret McLetchie	\$450.00	Email to Mr. Willick re directing communications since Abrams/ Abrams & Mayo now represented.	\$90.00
1/26/2017	3.1	Margaret McLetchie	\$450.00	Continued research re Anti-SLAPP issues.	\$1,395.00
1/26/2017	1.1	Pharan Burchfield	\$150.00	Draft Motion for Extension and Motion and Order for Order on Shortening Time re same.	\$165.00
1/27/2017	0.5	Alina Shell	\$350.00	Research regarding legislative history of NRS 41.650 - statute regarding immunity from civil action for statements re public matters. Edit motion for extension of time pursuant to research. Circulate edit to Ms. McLetchie.	\$175.00
1/27/2017	0.4	Gabriel Czop	\$25.00	Travel to Regional Justice Center, drop off Ex Parte Order to Judge Adair's chambers. [billed at lower rate]	\$10.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
1/27/2017	1.1	Margaret McLetchie	\$450.00	Call with Willick. Confer with Ms. Shell.	\$495.00
1/27/2017	0.1	Pharan Burchfield	\$150.00	Research dockets of similar cases for Ms. McLetchie; download docket and latest Complaint for Damages against Mr. Sanson.	\$15.00
1/27/2017	2.3	Pharan Burchfield	\$150.00	Editing and incorporating Ms. McLetchie's edits to Motion for Extension and Motion for an Order on Shortening Time re same. Prepare Declarations, exhibits, and proposed Orders re same. File and serve/mail/email/fax re same.	\$345.00
1/29/2017	0.2	Margaret McLetchie	\$450.00	Respond to email from Marshal Willick re scheduling, possible stipulation.	\$90.00
1/29/2017	0.3	Margaret McLetchie	\$450.00	Review case status.	\$135.00
1/30/2017	1.2	Margaret McLetchie	\$450.00	Review amended complaint; address issues re Order Shortening Time; call to chambers.	\$540.00
1/30/2017	0.2	Margaret McLetchie	\$450.00	Emails to client.	\$90.00
1/30/2017	1	Margaret McLetchie	\$450.00	Communications with client.	\$450.00
2/2/2017	2.3	Margaret McLetchie	\$450.00	Draft freeze letter. Research regarding preservation.	\$1,035.00
2/2/2017	0.2	Pharan Burchfield	\$150.00	Attention to preservation/freeze letters from opposing counsel.	\$30.00
2/3/2017	0.2	Alina Shell	\$350.00	Phone call with forensics expert. Sign freeze letter on behalf of Ms. McLetchie.	\$70.00
2/3/2017	0.1	Gabriel Czop	\$100.00	Research and locate a Nevada case that articulates the requirement to preserve evidence in anticipation of litigation.	\$10.00
2/3/2017	0.4	Gabriel Czop	\$100.00	Go to post office, mail certified letter, return receipt requested.	\$40.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
2/3/2017	2.6	Margaret McLetchie	\$450.00	Draft response to freeze letter from Abrams. Attention to retention of forensic expert. Attention to factual issues and related work.	\$1,170.00
2/3/2017	0.3	Pharan Burchfield	\$150.00	Finalize preservation/freeze letter. Send/email to Mr. Willick re same.	\$45.00
2/3/2017	0.5	Pharan Burchfield	\$150.00	Finalize Ms. McLetchie's letter to Mr. Willick in response to Ms. Abrams' preservation/freeze letter.	\$75.00
2/3/2017	0.8	Pharan Burchfield	\$150.00	Attention to preservation and document collection issues per direction from Ms. McLetchie.	\$120.00
2/3/2017	0.3	Pharan Burchfield	\$150.00	Email and phone calls re scheduling.	\$45.00
2/4/2017	0.2	Margaret McLetchie	\$450.00	Call with client.	\$90.00
2/5/2017	0.2	Margaret McLetchie	\$450.00	Review and consider email from Mr. Willick.	\$90.00
2/6/2017	3.5	Leo Wolpert	\$175.00	Meet with Ms. McLetchie and review research provided. [no charge.] Read Ms. Abrams' Complaint, read all website materials, review research re Anti-SLAPP law and precedent.	\$612.50
2/6/2017	0.6	Margaret McLetchie	\$450.00	Work with team re preservation issues.	\$270.00
2/7/2017	4.9	Leo Wolpert	\$175.00	Draft outline of argument in Anti-SLAPP motion, draft statement of relevant facts pursuant to direction from Ms. McLetchie.	\$857.50
2/7/2017	0.1	Margaret McLetchie	\$450.00	Review documents.	\$45.00
2/7/2017	0.2	Pharan Burchfield	\$150.00	Draft memo re case documentation.	\$30.00
2/8/2017	1.5	Leo Wolpert	\$175.00	Research and draft public interest Weinberg test section of Anti-SLAPP motion to dismiss.	\$262.50

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
2/8/2017	2.8	Leo Wolpert	\$175.00	Continue drafting Anti-SLAPP motion to dismiss.	\$490.00
2/9/2017	4.1	Leo Wolpert	\$175.00	Continue drafting Anti-SLAPP motion to dismiss, specifically public interest prong and good faith communications prong.	\$717.50
2/9/2017	0.8	Margaret McLetchie	\$450.00	Direct work on briefing: Motion to dismiss.	\$360.00
2/9/2017	0.1	Pharan Burchfield	\$150.00	Email communications to Mr. Sanson.	\$15.00
2/10/2017	2.2	Leo Wolpert	\$175.00	Continue Anti-SLAPP motion to dismiss.	\$385.00
2/11/2017	5.5	Leo Wolpert	\$175.00	Draft 12(b)(5) motion to dismiss.	\$962.50
2/12/2017	4	Leo Wolpert	\$175.00	Continue drafting motion to dismiss.	\$700.00
2/13/2017	6.8	Leo Wolpert	\$175.00	Continue drafting and editing 12(b)(5) motion to dismiss.	\$1,190.00
2/13/2017	0.6	Margaret McLetchie	\$450.00	Emails re issues pertaining to Ms. Abrams' efforts to interfere with VIPI Facebook. Research re counter-claims.	\$270.00
2/13/2017	0.9	Margaret McLetchie	\$450.00	Research. Work on motion to dismiss/ confer with Mr. Wolpert re same and check progress/ structure of brief. Update client.	\$405.00
2/14/2017	1	Margaret McLetchie	\$450.00	Direct research and writing of 12(b)(5) motion to dismiss.	\$450.00
2/14/2017	1	Margaret McLetchie	\$450.00	Review info from client re information on Mr. Willick's site. Research regarding anti-SLAPP motions.	\$450.00
2/15/2017	1.8	Leo Wolpert	\$175.00	Craft motion to strike.	\$315.00
2/15/2017	5.3	Leo Wolpert	\$175.00	Craft and edit 12(b)(5) motion to dismiss.	\$927.50

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
2/15/2017	8.5	Margaret McLetchie	\$450.00	Review related filings and drafts. Edit draft received from Mr. Wolpert and organize brief sections. Draft sections re court access and injunctive relief. Edit and expand introduction and fact section and begin editing defamation section. Research additional section re attorney's fees and sanctions and motion to strike.	\$3,825.00
2/16/2017	9.1	Alina Shell	\$350.00	Attention to Motion to Dismiss: edit / expand section re defamation per Ms. McLetchie's request. Draft separate section regarding sanctions. Edit motion to strike. Supervise finalization of tables and filing.	\$3,185.00
2/16/2017	0.8	Gabriel Czop	\$100.00	Begin legal cite checking the Motion to Dismiss.	\$80.00
2/16/2017	8.2	Leo Wolpert	\$175.00	Draft and edit RICO section of motion to dismiss, draft and edit motion to dismiss generally.	\$1,435.00
2/16/2017	2.1	Leo Wolpert	\$175.00	Draft motion to strike.	\$367.50
2/16/2017	0.3	Margaret McLetchie	\$450.00	Review correspondence.	\$135.00
2/16/2017	8.2	Margaret McLetchie	\$450.00	Revisions to response to motion to dismiss (False light, emotional distress claims, legal standard, and brief in its entirety). Draft new section re general failure to plead with specificity/ Research re lack of corp. standing to pursue emotional distress and false light claims. Meet with Mr. Sanson.	\$3,690.00
2/16/2017	0.2	Pharan Burchfield	\$150.00	Attention to documentation and files.	\$30.00

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
2/16/2017	4.5	Pharan Burchfield	\$150.00	Draft Motion for Leave to Exceed Page Limits for attorneys' review. File and serve/mail re same. Finalize Motion to Dismiss (create table of contents and table of authorities); file and serve/mail re same. Finalize Motion to Strike; file and serve/mail re same.	\$675.00
2/17/2017	0.2	Margaret McLetchie	\$450.00	Conferences re case status.	\$90.00
2/17/2017	0.4	Pharan Burchfield	\$150.00	Check file; calendaring.	\$60.00
2/25/2017	2.3	Leo Wolpert	\$175.00	Continue drafting/editing Anti-SLAPP motion to dismiss.	\$402.50
2/27/2017	0.2	Margaret McLetchie	\$450.00	Review emails re status.	\$90.00
2/27/2017	0.5	Margaret McLetchie	\$450.00	Check file, docket, and upcoming dates.	\$225.00
3/1/2017	0.5	Margaret McLetchie	\$450.00	Research re protections for journalists.	\$225.00
3/2/2017	3.9	Leo Wolpert	\$175.00	Continue drafting anti-SLAPP motion to dismiss.	\$682.50
3/2/2017	0.4	Margaret McLetchie	\$450.00	Provide direction re work on Anti-SLAPP motion.	\$180.00
3/3/2017	0.9	Margaret McLetchie	\$450.00	Meeting with Steve; follow up with email to Steve.	\$405.00
3/6/2017	1.3	Leo Wolpert	\$175.00	Edit opposition to motion for order shortening time and, Mr. Sanson's declaration re same.	\$227.50
3/7/2017	0.5	Margaret McLetchie	\$450.00	Review response/ counter-motion. Follow up re transcription and striking Leavitt. Review email re calendaring.	\$225.00
3/7/2017	0.1	Pharan Burchfield	\$150.00	Call Veritext Legal Solutions re quote to transcribe audio re Saiter hearing to use as exhibit.	\$15.00

MCLETCHIE SHELL

Date	Time Expended	Biller	Rate	Description	Total
3/7/2017	0.2	Pharan Burchfield	\$150.00	Review Opposition to Motion to Dismiss and Opposition to Motion to Strike with Countermotions for Attorneys' Fees; update and calculate calendar re same.	\$30.00
3/8/2017	1.1	Alina Shell	\$350.00	Per Ms. McLetchie's request, research regarding time for filing opposition to Anti-SLAPP motion. Draft memorandum re same.	\$385.00
3/8/2017	0.2	Margaret McLetchie	\$450.00	Research re burden plaintiff has in responding to Anti-SLAPP motion.	\$90.00
3/8/2017	1.6	Margaret McLetchie	\$450.00	Research re attorney's fees requested in countermotions.	\$720.00
3/8/2017	0.7	Margaret McLetchie	\$450.00	Attention to checking date calculations and to case management.	\$315.00
3/9/2017	0.1	Margaret McLetchie	\$450.00	Review notice of reassignment. Forward to client.	\$45.00
3/9/2017	0.1	Margaret McLetchie	\$450.00	Attention to obtaining exhibits for use in anti-SLAPP motion.	\$45.00
3/9/2017	1	Margaret McLetchie	\$450.00	Review research re "SLAPP back" provisions of NRS 41.670 and research various procedural matters.	\$450.00
3/11/2017	0.2	Margaret McLetchie	\$450.00	Attention to obtaining Saiter transcript.	\$90.00
3/13/2017	0.7	Admin Admin	\$25.00	Dropped off flash drive to be transcribed at Veritext: 2250 S Rancho Drive Suite 195	\$17.50
3/13/2017	0.2	Margaret McLetchie	\$450.00	Rule 11/sanctions research.	\$90.00
3/13/2017	0.3	Margaret McLetchie	\$450.00	Review filings from Willick case.	\$135.00
3/13/2017	0.2	Margaret McLetchie	\$450.00	Follow up re obtaining transcript from Saiter case.	\$90.00
3/13/2017	0.1	Pharan Burchfield	\$150.00	Call to client.	\$15.00

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
3/13/2017	0.1	Pharan Burchfield	\$150.00	Complete order form for transcription re Saiter divorce hearing with Veritext Legal Solutions.	\$15.00
3/14/2017	0.2	Margaret McLetchie	\$450.00	Research re Rule 11 sanctions.	\$90.00
3/16/2017	0.3	Alina Shell	\$350.00	Assist in preparation of Anti-SLAPP motion and supporting documents. Edit draft declaration of Steve Sanson.	\$105.00
3/16/2017	0.8	Gabriel Czop	\$100.00	Research for Ms. McLetchie re: applicable test in anti-SLAPP motions and whether public interest is the same as public concern.	\$80.00
3/17/2017	0.4	Gabriel Czop	\$100.00	Research anti-SLAPP statute and finish writing footnote comparing NV and CA statutes.	\$40.00
3/19/2017	2.3	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss.	\$402.50
3/20/2017	1.9	Alina Shell	\$350.00	Edit declaration in support of Anti-SLAPP motion. Per Ms. McLetchie's request, edit Anti-SLAPP motion.	\$665.00
3/20/2017	3.0	Margaret McLetchie	\$450.00	Direct work on Anti-SLAPP motion; review and revise drafts.	\$1,350.00
3/20/2017	0.7	Alina Shell	\$350.00	Draft additional section for Anti-SLAPP regarding historical background re opening proceedings.	\$245.00
3/20/2017	3.9	Leo Wolpert	\$175.00	Continue editing anti-SLAPP motion to dismiss.	\$682.50
3/20/2017	0.8	Leo Wolpert	\$175.00	Edit Mr. Sanson's declaration for inclusion with anti-SLAPP motion to dismiss.	\$140.00
3/21/2017	1.1	Alina Shell	\$350.00	Edit most recent draft of Steve Sanson declaration. Review exhibits to declaration with Ms. Burchfield to address gaps and errors. Discuss same with Ms. McLetchie and Mr. Wolpert.	\$385.00
3/21/2017	3.2	Margaret McLetchie	\$450.00	Continued work on anti-SLAPP motion.	\$1,440.00
3/21/2017	2.8	Leo Wolpert	\$175.00	Continue editing anti-SLAPP motion to dismiss, implementing Ms. McLetchie comments.	\$490.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
3/21/2017	3	Leo Wolpert	\$175.00	Cite check and edit anti-SLAPP motion to dismiss.	\$525.00
3/21/2017	0.4	Pharan Burchfield	\$150.00	Prepare exhibits in support of Anti-SLAPP motion to dismiss.	\$60.00
3/27/2017	2	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss.	\$350.00
3/28/2017	0.1	Alina Shell	\$350.00	Assist with finding full case cites for inclusion in anti-SLAPP motion.	\$35.00
3/28/2017	3.4	Margaret McLetchie	\$450.00	Revisions to Anti-SLAPP Motion.	\$1,530.00
3/28/2017	0.2	Alina Shell	\$350.00	Locate template motion to file under seal for Mr. Wolpert to use in drafting motion to dismiss. Review and respond to email from Ms. McLetchie regarding issues pertaining to anti-SLAPP motions.	\$70.00
3/28/2017	2.3	Gabriel Czop	\$100.00	Review and cite check Special Motion to Dismiss pursuant to Nev. Rev. Stat. 41.660	\$230.00
3/28/2017	2.5	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss and draft motion to file under seal.	\$437.50
3/28/2017	5.1	Pharan Burchfield	\$150.00	Finalize exhibits and declarations re Anti-SLAPP motion. Prepare motion to file exhibit 13 under seal. Prepare table of contents and table of authorities re same. File and serve/mail Anti-SLAPP motion, motion to file under seal (exhibit 13) and declarations.	\$765.00
3/30/2017	2.3	Leo Wolpert	\$175.00	Begin drafting replies to oppositions to motion to dismiss and motion to strike	\$402.50
3/30/2017	0.1	Pharan Burchfield	\$150.00	Review recent pleadings in Abrams v. Schneider matter; calendar accordingly; email file-stamped copies to client.	\$15.00
3/31/2017	2.5	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$437.50
4/4/2017	4.3	Leo Wolpert	\$175.00	Confer with Ms. McLetchie re reply to opposition to motion to dismiss, continue drafting reply.	\$752.50

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
4/4/2017	0.1	Margaret McLetchie	\$450.00	Check status of filings.	\$45.00
4/4/2017	0.2	Margaret McLetchie	\$450.00	Respond to client inquiry.	\$90.00
4/4/2017	0.4	Margaret McLetchie	\$450.00	Direct work on reply.	\$180.00
4/5/2017	0.5	Leo Wolpert	\$175.00	Additional attention to reply to opposition to motion to dismiss.	\$87.50
4/5/2017	0.2	Margaret McLetchie	\$450.00	Check deadline for plaintiffs to respond to anti-SLAPP motion.	\$90.00
4/8/2017	0.9	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$157.50
4/13/2017	0.8	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$140.00
4/14/2017	0.2	Margaret McLetchie	\$450.00	Attention to SAO; review same and emails with opposing counsel; update to client.	\$90.00
5/7/2017	2.5	Leo Wolpert	\$175.00	Review opposition to anti-SLAPP motion to dismiss, research regarding counter-arguments.	\$437.50
5/7/2017	0.4	Margaret McLetchie	\$450.00	Attention to work on reply to omnibus opposition.	\$180.00
5/10/2017	3.5	Leo Wolpert	\$175.00	Research and draft motion to dismiss appeal.	\$612.50
5/24/2017	1.2	Leo Wolpert	\$175.00	Research and draft reply to non-opposition to motion to seal.	\$210.00
5/25/2017	0.7	Alina Shell	\$350.00	Edit request to unseal Exhibit 13 to anti-SLAPP motion to dismiss.	\$245.00
5/25/2017	2.7	Alina Shell	\$350.00	Read Anti-SLAPP opposition. Review cases cited in opposition and research additional cases. Begin drafting reply.	\$945.00
5/25/2017	2.3	Leo Wolpert	\$175.00	Continue working on reply to opposition to 12b5 motion to dismiss (1.5), rewrite reply to non-opposition to seal (.75)	\$402.50

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
5/25/2017	1.8	Margaret McLetchie	\$450.00	Revise reply to motion to seal re Saiter documents. Draft reply ISO Motion to Strike. Revise reply re 12(b)(5) draft.	\$810.00
5/26/2017	4.7	Alina Shell	\$350.00	Attention to reply to opposition to anti-SLAPP motion to dismiss: draft sections regarding what constitutes a public interest and address Plaintiffs' argument re "republishing."	\$1,645.00
5/26/2017	0.9	Margaret McLetchie	\$450.00	Work on reply; follow up re deadline for same.	\$405.00
5/26/2017	0.2	Pharan Burchfield	\$150.00	Finalize, file, and serve (electronic and mail) Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (anti-SLAPP).	\$30.00
5/30/2017	1.4	Alina Shell	\$350.00	Research for reply to opposition to motion to dismiss re verification of facts.	\$490.00
5/30/2017	1.8	Alina Shell	\$350.00	Expand section in reply to opposition to motion to dismiss re failure to state a claim for defamation.	\$630.00
5/30/2017	1.2	Alina Shell	\$350.00	Attention to response to argument in Plaintiffs' opposition to Anti-SLAPP regarding right to limited discovery. Review section in opposition re limited discovery. Legal research re same. Draft section.	\$420.00
5/30/2017	2.8	Alina Shell	\$350.00	Resume drafting reply to opposition to Anti-SLAPP motion: re-read opposition section regarding publication. Research arguments in opposition. Re-draft section on republication. Review drafted arguments re Anti-SLAPP elements and email to Ms. McLetchie.	\$980.00
5/30/2017	2	Leo Wolpert	\$175.00	Edit and finalize omnibus replies to motions to dismiss, motion to strike.	\$350.00
5/30/2017	3.8	Margaret McLetchie	\$450.00	Editing and revising of reply. Circulate to client. Attention to motion for excess pages.	\$1,710.00

MCLETCHIE SHELL

Date	Time Expended	Biller	Rate	Description	Total
5/30/2017	2.3	Pharan Burchfield	\$150.00	Finalize (proof, format, create tables of contents and tables of authorities), file and serve/mail VIPI Defendants' Omnibus Reply to: (1) Plaintiff's Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiff's Opposition to Motion to Dismiss and Countermotion for Attorney's Fees.	\$345.00
5/30/2017	0.2	Pharan Burchfield	\$150.00	Finalize, file, and serve/mail Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiff's Countermotion for Attorney's Fees.	\$30.00
5/30/2017	0.5	Pharan Burchfield	\$150.00	Draft, incorporate Ms. McLetchie's edits, file, and serve/mail Motion for Excess Pages re Omnibus Reply.	\$75.00
5/31/2017	0.8	Pharan Burchfield	\$150.00	Create hard-copy courtesy copies of entire briefing to Honorable Judge Leavitt in preparation of upcoming motions hearing. Direct Ms. Lopez (admin) to delivery to Department 12.	\$120.00
6/1/2017	0.3	Admin Admin	\$25.00	Dropped off three binders of Motion to Dismiss at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 department 12.	\$7.50
6/1/2017	0.1	Pharan Burchfield	\$150.00	Email client file-stamped copies of recent pleadings in Abrams v. Schneider et al. case.	\$15.00
6/4/2017	5.3	Leo Wolpert	\$175.00	Assist Ms. McLetchie in preparing for 6/5 hearing by charting out, summarizing and gathering quotes from cases relevant to arguments, charting out how to argue that each allegedly defamatory statement is non actionable.	\$927.50
6/4/2017	8.2	Margaret McLetchie	\$450.00	Hearing preparation. Review all materials and prepare outline.	\$3,690.00
6/5/2017	4.4	Margaret McLetchie	\$450.00	Prepare for hearing; attend hearing/argue.	\$1,980.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
6/6/2017	0.8	Margaret McLetchie	\$450.00	Preliminary review of Plaintiffs' supplemental opposition. Research re same.	\$360.00
6/7/2017	1	Alina Shell	\$350.00	Read supplement to Plaintiffs' omnibus opposition. Draft initial portion of response. Email to Ms. McLetchie.	\$350.00
6/7/2017	2.1	Margaret McLetchie	\$450.00	Review and analyze supplemental opposition. Work on supplemental reply addressing: (1) supp. opp. filed by Plaintiffs; (2) issues re publication of mass emails. Client declaration.	\$945.00
6/8/2017	5.6	Margaret McLetchie	\$450.00	Research and drafting of supplemental reply; review and edit.	\$2,520.00
6/9/2017	0.3	Alina Shell	\$350.00	Proofread response to supplement to omnibus opposition.	\$105.00
6/9/2017	3.4	Margaret McLetchie	\$450.00	Further revising of supplemental reply; add discussion re /exhibits/revise declaration re assertion that Mr. Saiter requested take-down.	\$1,530.00
6/9/2017	1	Pharan Burchfield	\$150.00	Finalize, file, and serve/mail VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees. Meeting with client.	\$150.00
6/12/2017	0.4	Admin Admin	\$25.00	Dropped off: VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat 41.600 (Anti - SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 department 12.	\$10.00
6/22/2017	0.2	Margaret McLetchie	\$450.00	Attention to fee application issues.	\$90.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
6/22/2017	0.6	Margaret McLetchie	\$450.00	Review minutes. Call with client. Take call from reporter.	\$270.00
6/27/2017	0.9	Alina Shell	\$350.00	Begin drafting proposed order granting anti-SLAPP motion to dismiss.	\$315.00
6/28/2017	0.6	Alina Shell	\$350.00	Resume drafting proposed order.	\$210.00
6/28/2017	0.1	Margaret McLetchie	\$450.00	Respond to opposing counsel request re review order.	\$45.00
6/28/2017	0.3	Margaret McLetchie	\$450.00	Emails with client.	\$135.00
6/29/2017	0.2	Margaret McLetchie	\$450.00	Emails with client.	\$90.00
6/29/2017	0.2	Margaret McLetchie	\$450.00	Attention to preliminary work on fees motion, and research re same.	\$90.00
7/3/2017	2.1	Alina Shell	\$350.00	Draft proposed order granting VIPI Defendants' anti-SLAPP motion to dismiss.	\$735.00
7/3/2017	1.5	Alina Shell	\$350.00	Incorporate Ms. McLetchie's and Mr. Wolpert's edits into proposed order.	\$525.00
7/3/2017	2.8	Alina Shell	\$350.00	Per Ms. McLetchie's request, expand proposed order granting anti-SLAPP motion to dismiss.	\$980.00
7/3/2017	0.5	Leo Wolpert	\$175.00	Per Ms. Shell's request, proofread order granting anti-SLAPP motion to dismiss.	\$87.50
7/3/2017	0.9	Margaret McLetchie	\$450.00	Direct Ms. Shell re expanding order. Email to counsel for Schneider. Email to opposing counsel.	\$405.00
7/5/2017	0.5	Admin Admin	\$25.00	Made payment for transcript (June 5, 2017 hearing) to Clark County Treasurer, and LGM Transcription Services at the Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101.	\$12.50
7/5/2017	0.8	Alina Shell	\$350.00	Review transcript of 6/27/17 hearing on anti-SLAPP motion. Incorporate facts from transcript into proposed order granting anti-SLAPP motion.	\$280.00
7/5/2017	0.4	Leo Wolpert	\$175.00	Edit and proofread order granting anti-SLAPP motion to dismiss.	\$70.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
7/5/2017	1	Margaret McLetchie	\$450.00	Revise draft proposed order and provide to C.J. Potter, and to opposing counsel.	\$450.00
7/5/2017	0.4	Pharan Burchfield	\$150.00	Finalize Proposed Order and letter from Ms. McLetchie to Mr. Gilmore; send re same.	\$60.00
7/6/2017	0.7	Admin Admin	\$25.00	Dropped off letter address to Judge Leavitt dated July, 6, 2017 at the Regional Just Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$17.50
7/6/2017	0.3	Margaret McLetchie	\$450.00	Emails and call with opposing counsel, Josh Gilmore, re extension of deadline to submit proposed order. Edit draft letter to chambers re same/ approve and sign.	\$135.00
7/6/2017	0.1	Pharan Burchfield	\$150.00	Finalize and send (via email) Ms. McLetchie's letter to Honorable Judge Leavitt re extension of time to submit proposed order.	\$15.00
7/13/2017	0.1	Pharan Burchfield	\$150.00	Provide client with copies of Mr. Gilmore's edits to Ms. McLetchie's proposed order.	\$15.00
7/14/2017	1	Alina Shell	\$350.00	Review Mr. Gilmore's redlines to draft proposed order. Edit and send to Ms. McLetchie for review.	\$350.00
7/14/2017	0.3	Margaret McLetchie	\$450.00	Attention to issues re proposed order, edits from opposing counsel. Review same.	\$135.00
7/14/2017	0.4	Pharan Burchfield	\$150.00	Draft and send (hand-deliver and email) letter to Judge Leavitt with proposed order. Prepare proposed order to be submitted to Court. Email same to opposing counsel. Email client re same.	\$60.00
7/19/2017	0.2	Pharan Burchfield	\$150.00	Draft Stipulation and Proposed Order re extension of deadline to file Motion for Attorney's Fees Application pursuant to NRS 41.670.	\$30.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
7/20/2017	0.5	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$12.50
7/20/2017	0.5	Admin Admin	\$25.00	Picked up: Mr. Potter's signature at: 1125 Shadow Ln, Las Vegas, NV 89102 for Stipulation and [Proposed] Order.	\$12.50
7/20/2017	0.5	Admin Admin	\$25.00	Picked up: Stipulation and Proposed Order at Bailey Kennedy Attorneys at Law: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$12.50
7/20/2017	0.1	Alina Shell	\$350.00	Phone call to co-defendant counsel CJ Potter regarding stipulation to extend date for motion for fees.	\$35.00
7/20/2017	0.4	Alina Shell	\$350.00	Redline Mr. Gilmore's re-draft of stipulation to extend. Phone call with Mr. Gilmore re same. Review follow-up email from Mr. Gilmore.	\$140.00
7/20/2017	0.2	Margaret McLetchie	\$450.00	Attention to stipulation.	\$90.00
7/24/2017	0.1	Margaret McLetchie	\$450.00	Approve NEOJ.	\$45.00
7/24/2017	0.4	Pharan Burchfield	\$150.00	File Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); draft, file, and serve/mail Notice of Entry of Order re same; email client re same.	\$60.00
7/25/2017	0.1	Margaret McLetchie	\$450.00	Emails re deadline for attorney fee / other NRS award application.	\$45.00
7/26/2017	0.4	Admin Admin	\$25.00	Picked up: Stipulated and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
7/26/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order (extension motion for attorneys' fees); draft, file, and serve/mail Notice of Entry of Order re same. Update calendar deadlines accordingly.	\$45.00
8/4/2017	0.2	Margaret McLetchie	\$450.00	Call with client.	\$90.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
8/7/2017	0.9	Margaret McLetchie	\$450.00	Research re application for attorney's fees.	\$405.00
8/7/2017	0.3	Margaret McLetchie	\$450.00	Call with Mr. C.J. Potter; attention to editing stipulation for extension drafted by paralegal; various communications re same.	\$135.00
8/8/2017	0.2	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$5.00
8/8/2017	0.4	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
8/8/2017	0.4	Admin Admin	\$25.00	Picked up: Mr. Potter's signature for a Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102.	\$10.00
8/8/2017	0.4	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102.	\$10.00
8/8/2017	0.8	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at Bailey Kennedy, LLP: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$20.00
8/8/2017	0.4	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
8/8/2017	0.1	Alina Shell	\$350.00	Phone call with CJ Potter re obtaining new signature on stipulation to extend time for filing motion for attorney's fees. Email update to Ms. McLetchie re same.	\$35.00
8/8/2017	0.1	Margaret McLetchie	\$450.00	Email from opposing counsel; follow-up re extension.	\$45.00
8/16/2017	0.1	Alina Shell	\$350.00	Attention to obtaining costs documentation.	\$35.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
8/17/2017	0.6	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$15.00
8/17/2017	0.1	Alina Shell	\$350.00	Phone call from Ira Victor regarding invoice for services.	\$35.00
8/17/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order. Draft, file, and serve/mail Notice of Entry of Order re same. Update calendar accordingly.	\$45.00
8/21/2017	6.2	Alina Shell	\$350.00	Attention to attorney's fees motion: legal research regarding appropriate work to include in request fees in Anti-SLAPP cases. Draft motion for attorney's fees and discuss same with Ms. McLetchie. Confer with CJ Potter regarding whether an additional extension of time is necessary in light of Cal Potter's health issues. Email and voicemail to Josh Gilmore re same. Review costs incurred in litigation for inclusion in Motion. Circulate to Ms. McLetchie and Mr. Wolpert for review.	\$2,170.00
8/22/2017	0.5	Admin Admin	\$15.00	Picked up: Mr. Potter's signature at the Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102 for the Stipulation and [Proposed] Order.	\$7.50
8/22/2017	0.6	Admin Admin	\$25.00	Picked up: Signed Stipulation and [Proposed] at Bailey Kennedy: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$15.00
8/22/2017	0.6	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$15.00

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
8/22/2017	0.2	Alina Shell	\$350.00	Draft stipulation to extend deadline for filing motions pursuant to NRS 41.670. Circulate to parties.	\$70.00
8/22/2017	0.1	Margaret McLetchie	\$450.00	Confer with Ms. Shell re extension.	\$45.00
8/31/2017	0.5	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order that the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$12.50
8/31/2017	0.1	Margaret McLetchie	\$450.00	Review approved order on schedule for fees and costs application.	\$45.00
8/31/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order (third extension re attorney's fees application). Draft, file, and serve/mail Notice of Entry of Order re same. Update calendar accordingly.	\$45.00
9/1/2017	0.1	Pharan Burchfield	\$150.00	Email to client.	\$15.00
9/11/2017	0.1	Alina Shell	\$350.00	Phone call to Mr. Gilmore regarding settlement statement due on 9/15. Left voicemail.	\$35.00
9/11/2017	0.5	Alina Shell	\$350.00	Review and make revisions to motion for attorney's fees. Edit declaration in support of fees for Ms. England's signature. Email both to Ms. McLetchie for review.	\$175.00
9/11/2017	0.1	Margaret McLetchie	\$450.00	Approve notice of entry of order.	\$45.00
9/11/2017	0.1	Margaret McLetchie	\$450.00	Confer with Ms. Shell re assignment to settlement judge.	\$45.00
9/11/2017	1.5	Margaret McLetchie	\$450.00	Attention to work for attorney fee application.	\$675.00
9/12/2017	0.9	Alina Shell	\$350.00	Edit time entry spreadsheet for inclusion in fee application.	\$315.00
9/12/2017	0.3	Alina Shell	\$350.00	Edit declaration for Mr. Sanson. Meet with Mr. Sanson re same.	\$105.00

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
9/12/2017	0.3	Alina Shell	\$350.00	Additional edits to Ms. England's declaration in support of attorney/paralegal rates.	\$105.00
9/12/2017	4.5	Alina Shell	\$350.00	Revise motion for attorney's fees and costs. Compile exhibits. Finalize and file motion and exhibits.	\$1,575.00
9/12/2017	2.2	Margaret McLetchie	\$450.00	Attorney fee application	\$990.00
9/12/2017	2.0	Leo Wolpert	\$175.00	Edit and review costs/fees for attorney fee application.	\$350.00
				TOTAL	\$91,090.00

TOTALS BY BILLER:

Biller	Time Expended (Hours)	Total Billed
Pharan Burchfield	26.8	\$4020.00
Gabriel Czop	5.2	\$490.00
Daniela Lopez (Admin Admin)	9.9	\$242.50
Margaret McLetchie	106.5	\$47,925.00
Alina Shell	55.5	\$19,425.00
Leo Wolpert	108.5	\$18,987.50
TOTAL	312.4	\$91,090

EXHIBIT 3

MCLETCHE SHELL

Date	Price	Note
1/24/2017	\$ 0.92	Postage: mailing expense - Notice of Appearance mailed to Abrams & Mayo Law Firm and G Law.
1/24/2017	\$ 3.50	E-filing fee: Initial Appearance Fee Disclosure (NRS Chapter 19).
1/24/2017	\$ 264.09	E-filing fee: Notice of Appearance [Amount: \$3.50; Court Fee: \$253.00; Card Fee: \$7.59].
1/27/2017	\$ 3.50	E-filing fee: Motion to Extend Pursuant to Nev. Rev. Stat. 41.660(6) and EDCR 2.25(a).
1/27/2017	\$ 1.34	Postage: mailing expense - Motion to Extend Pursuant to Nev. Rev. Stat. 41.660(6) and EDCR 2.25(a) sent to Willick Law Group and G Law.
1/31/2017	\$ 30.80	Copying Costs: Through January 31, 2017: 385 pages at \$0.08 per page.
1/31/2017	\$ 27.14	Legal Research: WestLawNext - charges for 46 transactions for January 2017.
2/3/2017	\$ 7.05	Postage: mailing expense.
2/3/2017	\$ 0.92	Postage: mailing expense.
2/3/2017	\$ 0.46	Postage: mailing expense - letter to Mr. Willick in response to Ms. Abrams' preservation/freeze letter.
2/3/2017	\$ 0.92	Postage: mailing expense - preservation/freeze letter to Mr. Willick.
2/16/2017	\$ 3.50	E-filing fee: Motion for Leave to Exceed Page Limit for Their Motion to Dismiss.
2/16/2017	\$ 3.50	E-filing fee: Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof.
2/16/2017	\$ 3.50	E-filing fee: Motion to Strike.
2/16/2017	\$ 14.00	Postage: mailing expense - Motion to Strike, Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof, and Motion for Leave to Exceed Page Limit for Their Motion to Dismiss mailed to opposing counsel.
2/28/2017	\$ 40.88	Copying Costs: February 1, 2017 - February 28, 2017: 511 pages at \$0.08 per page.
2/28/2017	\$ 458.28	Legal Research: WestLawNext - charges for 449 transactions for February 2017.
3/28/2017	\$ 33.25	Postage: mailing expense - Under seal exhibits to Anti-SLAPP motion to dismiss (filed under seal) sent to opposing counsel (multiple law offices).

MCLETCHE SHELL

Date	Price	Note
3/31/2017	\$ 59.76	Copying Costs: March 1, 2017 - March 31, 2017: 747 pages at \$0.08 per page.
4/3/2017	\$ 120.82	Legal Research: WestLawNext - charges for 261 transactions for March 2017.
4/30/2017	\$ 12.32	Copying Costs: April 1, 2017 - April 30, 2017: 154 pages at \$0.08 per page.
4/30/2017	\$ 13.61	Legal Research: WestLawNext - charges for 33 transactions for April 2017.
5/26/2017	\$ 2.30	Postage: mailing expense - Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 of Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. Â§ 41.660 (anti-SLAPP) sent to opposing counsel (5 law offices).
5/26/2017	\$ 3.50	E-filing fee: Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 of Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (anti-SLAPP).
5/30/2017	\$ 3.50	E-filing fee: Defendants Steven W. Sanson and Veterans in Politics International, Inc.'s Motion for Leave to Exceed Page Limit for Their Omnibus Reply to: (1) Plaintiff's Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiff's Opposition to Motion to Dismiss and Countermotion for Attorney's Fees.
5/30/2017	\$ 3.50	E-filing fee: Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiff's Countermotion for Attorney's Fees.
5/30/2017	\$ 17.50	Postage: mailing expense - Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiff's Countermotion for Attorney's Fees; Motion for Leave to Exceed Page Limit for Their Omnibus Reply; and Omnibus Reply to: (1) Plaintiff's Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiff's Opposition to Motion to Dismiss and Countermotion for Attorney's Fees sent to opposing counsel (5 law offices).
5/30/2017	\$ 3.50	E-filing fee: VIPI Defendants' Omnibus Reply to: (1) Plaintiff's Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiff's Opposition to Motion to Dismiss and Countermotion for Attorney's Fees.

MCLETCHE SHELL

Date	Price	Note
5/31/2017	\$ 83.04	Copying Costs: May 1, 2017 - May 31, 2017: 1,038 pages at \$0.08 per page.
5/31/2017	\$ 254.39	Legal Research: WestLawNext - charges for 372 transactions for May 2017.
6/1/2017	\$ 0.47	Dropped off three binders of Motion to Dismiss at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 department 12. Total miles: 0.9 at 0.54 cents per mile.
6/9/2017	\$ 3.50	E-filing fee: VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees.
6/9/2017	\$ 8.05	Postage: mailing expense - VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees sent to opposing counsel (5 law offices).
6/30/2017	\$ 93.36	Copying Costs: June 1, 2017 - June 30, 2017: 1,167 pages at \$0.08 per page.
6/30/2017	\$ 84.60	Legal Research: WestLawNext - charges for 124 transactions for June 2017.
7/5/2017	\$ 402.67	Invoice # 1392: LGM Transcription Service (June 5, 2017 hearing).
7/5/2017	\$ 80.00	Invoice for hourly recording fee (June 5, 2017 hearing).
7/5/2017	\$ 0.49	Made payment for transcript (June 5, 2017 hearing) to Clark County Treasurer, and LGM Transcription Services at the Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101. Total miles 0.9 at 0.54 cents/per mile.
7/20/2017	\$ 18.52	Picked up: Stipulation and Proposed Order at Bailey Kennedy Attorneys at Law: 8984 Spanish Ridge Ave, Las Vegas, NV 89148. Total miles 34.3 at 0.54 cents/ per mile.
7/20/2017	\$ 1.19	Picked up Mr. Potter's signature at: 1125 Shadow Ln, Las Vegas, NV 89102 for Stipulation and [Proposed] Order. Total miles 2.2 at 0.54 cents/ per mile.

MCLETCHE SHELL

Date	Price	Note
7/20/2017	\$ 0.49	Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12. Total miles: 0.9 at 0.54 cents/ per mile.
7/20/2017	\$ 18.36	Picked up: Stipulation and Proposed Order at Bailey Kennedy Attorneys at Law: 8984 Spanish Ridge Ave, Las Vegas, NV 89148. Total miles: 34.0 at 0.54/ cents per mile.
7/24/2017	\$ 3.50	E-filing fee: Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP).
7/24/2017	\$ 3.50	E-filing fee: Notice of Entry of Order.
7/24/2017	\$ 9.10	Postage: mailing expense - Notice of Entry of Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP) sent to opposing counsel (5 offices).
7/26/2017	\$ 3.50	E-filing fee: Stipulation and Order.
7/26/2017	\$ 3.50	E-filing fee: Notice of Entry of Order.
7/26/2017	\$ 3.35	Postage: mailing expense - Notice of Entry of Order (extension re motions for attorneys' fees) sent to opposing counsel (5 offices).
7/31/2017	\$ 9.92	Copying Costs: July 1, 2017 - July 31, 2017: 124 pages at \$0.08 per page.
7/31/2017	\$ 5.29	Legal Research: WestLawNext - charges for 6 transactions for July 2017.
8/8/2017	\$ 18.41	Picked up Stipulation and [Proposed] Order at Bailey Kennedy, LLP: 8984 Spanish Ridge Ave, Las Vegas, NV 89148. Total miles: 34.1 at 0.54 cents/ per mile.
8/8/2017	\$ 1.24	Picked up Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102. Total miles: 2.3 at 0.54 cents/ per mile.
8/15/2017	\$ 0.22	Picked up Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12. Total Miles: 0.4 at 0.54 cents/ per mile
8/15/2017	\$ 0.97	Picked up Mr. Potter's signature for a Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102. Total miles: 1.8 at 0.54/ cents per mile.
8/15/2017	\$ 1.03	Dropped off Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12. Total Miles: 1.9 at 0.54 cents/ per mile.

MCLECHIE SHELL

Date	Price	Note
8/17/2017	\$ 3.50	E-filing fee: Stipulation and Order.
8/17/2017	\$ 3.50	E-filing fee: Notice of Entry of Order.
8/17/2017	\$ 3.35	Postage: mailing expense - Notice of Entry of Order (second extension re motions for attorneys' fees) sent to opposing counsel (5 offices).
8/17/2017	\$ 1,175.00	Privacy Technician, Inc. Invoice: Invoice # 2816
8/22/2017	\$ 0.49	Dropped of Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12. Total miles: 0.9 at 0.54 cents/ per mile.
8/22/2017	\$ 18.41	Picked up: Signed Stipulation and [Proposed] at Bailey Kennedy: 8984 Spanish Ridge Ave, Las Vegas, NV 89148. Total miles 34.1 at 0.54 cents/ per mile.
8/23/2017	\$ 1.35	Picked up Mr. Potter's signature at the Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102 for the Stipulation and [Proposed] Order. Total miles: 2.5 at 0.54 cents/ per mile.
8/31/2017	\$ 3.35	Postage: mailing expense - Notice of Entry of Order (third extension re motions for attorneys' fees) sent to opposing counsel (5 offices).
8/31/2017	\$ 3.50	E-filing fee: Stipulation and Order.
8/31/2017	\$ 3.50	E-filing fee: Notice of Entry of Order.
8/31/2017	\$ 5.68	Copying Costs: August 1, 2017-August 31, 2017: 71 pages at \$0.08 per page.
8/31/2017	\$ 62.34	Legal Research: WestLawNext - charges for 50 transactions for August 2017.
	\$ 3,534.49	Total Costs and Expenses

EXHIBIT 4

Margaret A. McLetchie, Nevada Bar No. 10931
MCLETSCHIE SHELL LLC
701 East Bridger Ave., Suite 520
Las Vegas, NV 89101
Telephone: (702) 728-5300
Facsimile: (702) 425-8220
Email: maggie@nvlitigation.com
*Attorneys for Defendants STEVE W. SANSON
and VETERANS IN POLITICS INTERNATIONAL, INC.*

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

JENNIFER V. ABRAMS and THE
ABRAMS & MAYO LAW FIRM,
Plaintiff,
vs.

Case No.: A-17-749318-C

Dept. No.: XII

DECLARATION

LOUIS C. SCHNEIDER; LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC; STEVE
W. SANSON; HEIDI J. HANUSA;
CHRISTINA ORTIZ; JOHNNY SPICER;
DON WOOLBRIGHT; VETERANS IN
POLITICS INTERNATIONAL, INC.;
SANSON CORPORATION; KAREN
STEELMON; and DOES I THROUGH X,
Defendants.

**DECLARATION OF STEVE SANSON IN SUPPORT OF MOTION FOR
ATTORNEY'S FEES AND COSTS PURSUANT TO NRS § 41.670**

I, STEVE SANSON, hereby declare as follows:

1. I make this declaration in support of my Motion for Attorney's Fees and Costs Pursuant to NRS § 41.670. This declaration based on my personal knowledge, except as to matters stated to be based on information and belief. I am competent to testify as to the truth of these statements if called upon to do so.

2. I am the President of Defendant Veterans in Politics International, Inc. ("VIPI"). VIPI is a non-profit corporation that advocates on behalf of veterans and that works

1 to expose public corruption and wrongdoing.

2 3. It is my understanding that on January 27, 2017, the Abrams Plaintiffs sent
3 a letter to my attorney, Margaret A. McLetchie, demanding that I and VIPI preserve
4 electronically stored information that might be relevant to this case.

5 4. To respond to that demand, Ms. McLetchie asked to take possession of the
6 hard drive to the computer I use to conduct VIPI business.

7 5. Because I needed access to the files on the hard drive while this matter was
8 being litigated, I incurred costs in the amount of \$252.09 to have my hard drive cloned,
9 copied, and reinstalled on my computer.

10 6. A true and correct copy of the invoice for that service is attached hereto as
11 Exhibit A.

12 7. In addition, in order to respond to allegations by the Abrams Plaintiffs
13 regarding commentary I made about Ms. Abrams' courtroom demeanor in the *Saiter* matter
14 at the September 29, 2016 hearing, I and co-defendant Louis Schneider ordered a transcript
15 of that hearing.

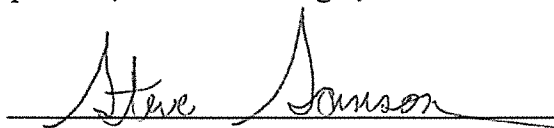
16 8. The total cost for the preparation of that transcript was \$1,461.20. A true
17 and correct copy of the invoice for the transcript is attached hereto as Exhibit B.

18 9. Of that amount, I paid \$730.60.

19 10. As a result of this litigation and related efforts to silence myself and VIPI,
20 and in light of the conduct of Plaintiffs and their initial counsel Marshal Willick, I believe
21 that VIPI and I are entitled to \$10,000.00 each.

22 I declare under penalty of perjury under the laws of the State of Nevada that the
23 foregoing is true and correct to the best of my knowledge and belief.

24
25 Dated this 12th day of September, 2017 in Las Vegas, NV.

26
27 

28 Steve Sanson

EXHIBIT A

Problem Report: take 1 TB HDD (\$99.95) and clone customers hard drive - use Macrium Reflect

Date: 02/14/2017

Time: 02:00 AM

to

02:00 AM

Tech: Rafael Santos

Major Cross

Special Instruction Durango / Farm

Problem: take 1 TB HDD (\$99.95) and clone customers hard drive

Solution: pc: check browsers, startup, installed apps, cleaner, mwb, pc is clean, install reflect, start clone, all partitions, copy finished with no errors, remove old hdd and set new one on tower, test printer.

Comments: cloned hdd set on pc, gave old hdd to customer

Status IncompleteJob

Payment Type: Check

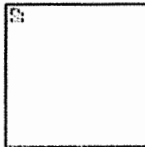
Invoice: 6514

Invoice Amount: \$ 252.0900

Cancel Notes:

Device List:

Snapshot:



[Update Image](#)

Map: [Yahoo Map](#) [Google Map](#) [MapQuest.com](#)

JVA001136

EXHIBIT B

**Veritext Corp
Western Region**

707 Wilshire Boulevard, Suite 3500
Los Angeles CA 90017
Tel. 877-955-3855 Fax. 949-955-3854
Fed. Tax ID: 20-3132569



Bill To: Anat Levy
Anat Levy & Associates, P.C.
5841 E Charleston Blvd
Suite 230-421
Las Vegas, NV, 89142

Invoice #: CA2916613
Invoice Date: 3/22/2017
Balance Due: \$1,461.20

Case: Adams, Jennifer V. v. Lewis Schneider
Job #: 2571637 | **Job Date:** 3/13/2017 | **Delivery:** Expedited
Billing Atty: Anat Levy
Location: Veritext Legal Solutions
2250 South Rancho Drive | Suite 195 | Las Vegas, NV 89102
Sched Atty: Alina M. Shell | McLatchie Shell LLC

Case No: 2:14-cv-01475-JAD-NJK

Witness	Description	Units	Quantity	Amount
Transcription	Audio - Transcription	Page	116.00	\$1,299.20
	Audio - Listening Time	Per hour	1.00	\$100.00
	Litigation Package	1	1.00	\$36.00
	Shipping & Handling	Package	1.00	\$26.00
Notes:		Invoice Total:		\$1,461.20
		Payments:		\$0.00
		Credit:		\$0.00
		Interest:		\$0.00
		Balance Due:		\$1,461.20

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult <http://www.veritext.com/services/all-services/services-information>

**To pay online, go to
www.veritext.com**

Veritext accepts all major credit cards
(American Express, Mastercard, Visa, Discover)

Please remit payment to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303

Invoice #: CA2916613
Job #: 2571637
Invoice Date: 3/22/2017
Balance: \$1,461.20

EXHIBIT 5

1 **DECLARATION OF ATTORNEY KATHLEEN J. ENGLAND**

2 I, Kathleen Jane England, hereby declare under the penalty of perjury that the following is
3 true and correct:

4 1. I am an attorney fully licensed to practice in all courts in Nevada. The facts stated
5 below are based on my personal knowledge and belief, are true and correct and I am competent to
6 so testify. I am making this Declaration in support of a portion of a fee petition and the hourly rates
7 being sought colleagues of mine.

8 2. After graduating from Suffolk University Law School in Boston in 1978, I moved
9 to Nevada, clerked for the Las Vegas City Attorney and became a Deputy City Attorney in 1979
10 after passing the Nevada bar. In 1982, I joined Vargas & Bartlett where I worked on many large
11 civil litigation matters in state and federal for seven years. Twice I was appointed and served as
12 co-chair of Defendants' Settlement Committee in the MGM Grand Fire Litigation, MDL #453. In
13 1989, I started the law firm of Combs & England, doing employment and complex civil litigation.
14 In 1994, I created England Law Office. In 1999, I re-joined my colleagues at Kummer Kaempfer
15 Bonner & Renshaw as a partner from 1999 to 2001. In 2001, I restarted the England Law Office
16 where I practiced as a solo practitioner or with one or two associates. In September 2016, I joined
17 The Law Offices of Gary M. Gilbert, PC, and a national law employment law firm. We created the
18 Gilbert & England Law Firm, a NV Rule 7.5A multijurisdictional law firm, where I am the
19 managing resident Nevada attorney.

20 3. In addition to Nevada, I am admitted to practice, in the US District Court (Nevada)
21 (1980), the Court of Appeals for the Ninth Circuit (1980) and the U.S. Supreme Court (1997.)

22 4. I have been asked by the McLetchie Shell law firm to provide my declaration in
23 support of a fee petition in the state court matter entitled *Jennifer Abrams, et al. v. Louis Schneider,*
24 *et al.*, Case No. A-17-749318-C.

1 5. I am familiar Ms. McLetchie and Ms. Shell, their superb reputation for handling
2 civil rights matters and cases and their expertise in matters involving constitutional law. Their
3 reputation is excellent and well-deserved. For the past few years, I have often referred them cases
4 which I am unable to handle or which are outside of my expertise or which would benefit from
5 their particular expertise in constitutional law. I call upon their expertise informally on matters of
6 case strategy and handling. Since 2012, I have enlisted Ms. McLetchie and now Ms. Shell as co-
7 counsel to assist me in representing clients with difficult and complex cases against large, well-
8 funded employer-defendants. IN the past two years, I have viewed and relied upon their research
9 and work product, and I have worked alongside them and their highly competent staff in drafting,
10 revising and finalizing pleadings. Based on those interactions, I can safely say they are entitled to
11 command the highest rates for their work.

12 6. Ms. McLetchie, who I understand was first admitted to the California bar in 2002,
13 has diverse and extensive legal experience, including in criminal matters and in complex litigation.
14 Ms. McLetchie previously served as a Staff Attorney, Legal Director, and Interim Southern
15 Program Director for the American Civil Liberties Union of Nevada, where I had occasion to work
16 with her on some cases.

17 7. I have had the opportunity to work or consult with Ms. McLetchie during both her
18 time at the ACLU of Nevada and her time in private practice. Based on my experience in working
19 with her, I know that Ms. McLetchie is a versatile, experienced, and creative litigator.

20 8. Ms. Shell, I understand who was admitted to the Nevada bar in 2009, has almost
21 eight years of legal experience. I understand that Ms. Shell was an attorney with the Federal Public
22 Defenders (FPD) for the District of Nevada from then until going into private practice in 2015.
23 While employed by the FPD, I understand that Ms. Shell represented numerous defendants in a
24 variety of criminal cases in federal courts and that she wrote and argued several complex criminal

1 appeals in the United States Court of Appeals for the Ninth Circuit. Her subsequent work since
2 moving into private practice in June 2015 shows the high level of past work she engaged in and
3 how she has transitioned those skills from criminal work to the civil side, which is quite impressive
4 in this short period of time. I am aware that Ms. Shell has represented plaintiffs in state and federal
5 court in civil matters, including civil rights and employment cases and I applaud her commitment
6 to do so because very few practitioners aspire to do this kind of work.

7 9. I have had several occasions to work with or consult with Ms. Shell during her time
8 in private practice, and have found her to be an intelligent and effective researcher, writer and
9 advocate for her client.

10 10. Pharan Burchfield is a paraprofessional (paralegal) at McLetchie Shell. I
11 understand that Ms. Burchfield has an associate's degree in paralegal studies (2014 from the
12 College of Southern Nevada) and has been a paralegal for three years, which surprises me because
13 her work product and her work ethic is equivalent to someone with 10-15 years of paralegal
14 litigation experience. Ms. Burchfield has assisted me in preparing a number of complex filings in
15 federal civil matters. Ms. Burchfield is one of the best paralegals I have had a chance to work with;
16 she has great attention for detail, and has the highest level of computer skills. She is organized, is
17 able to organize others and is calm in the face of nerve-wracking deadlines and last minute
18 obstacles. She is a problem-solver, and works very efficiently and very effectively.

19 11. I have been practicing in this field for the last 37 years and have submitted and
20 received multiple fee awards in state and federal courts and so I keep myself generally informed
21 of prevailing market rates in Las Vegas. As a result of a recent case where my client was granted
22 partial summary judgment by the U.S. District Court, I have recently re-familiarized myself with
23 the prevailing hourly rates for experienced employment law/civil rights attorneys and their staff
24 in the local Las Vegas legal community, both on the defense side (where the attorneys may accept

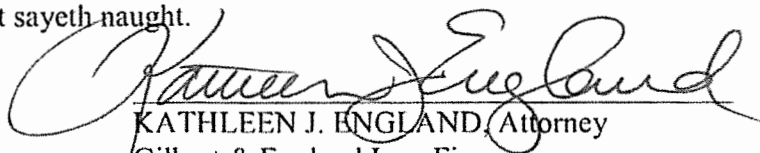
1 lower hourly rates in exchange for regular and non-contingent billings and immediate payments
2 by their clients who provide streams of billable work.

3 12. I understand that McLetchie Shell, LLC's billing rates are as follows:

Attorney/Biller	Year of Admission	Billing Rate
Margaret McLetchie	2002 (California) 2008 (Nevada)	\$450.00
Alina Shell	2009	\$350.00
Leo Wolpert	2012	\$175.00
Law clerk (law student)	n/a	\$100.00
Support staff and paralegal	n/a	\$150.00

12 13. In my opinion, and based on my recent research on fees and hourly rates, and
13 because these often involve matters which are hotly disputed by opposing counsel and well-funded
14 defendants, each of the rates set forth above are reasonable for the McLetchie Shell folks in
15 question, of whom I have personal knowledge, are not just reasonable but might even be
16 understated and low for the work that they represent in this legal community, which is difficult
17 work and not as remunerative as other practice areas. Thus, I think these McLetchie Shell rates are
18 below the market rates these folks could otherwise command in southern Nevada.

19 14. Further your affiant sayeth naught.

20 
21 KATHLEEN J. ENGLAND, Attorney
22 Gilbert & England Law Firm
23 610 South Ninth Street
24 Las Vegas, Nevada 89101
(702) 529-2311