

IN THE SUPREME COURT OF THE STATE OF NEVADA

LAW OFFICE OF DANIEL S. SIMON;
DOES 1 through 10; and, ROE
entities 1 through 10;

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA IN AND FOR THE COUNTY
OF CLARK; THE HONORABLE
TIERRA JONES

Respondents,

and

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC,

Real Parties in
Interest.

**SUPREME COURT
CASE NO.**

DISTRICT COURT CASE

NO.: A-16-738444-C

Consolidated with:

DISTRICT COURT CASE

NO.: A-18-767242-C

Electronically Filed
Oct 17 2019 03:15 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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VOLUME II OF IX**

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Attorney for Petitioner

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10/25/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/25/17	Receive, Review and Analyze Email from Client with Attachment	.40
10/25/17	Draft and send email to AF re new topic for 30(b)(6) notice and written discovery to Viking and review AF response	.25
10/25/17	Call with Client	.10
10/25/17	Call with Client	.25
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10/26/17	Draft and Send Email to Client with Link	.15
10/26/17	Draft and Send Email to Client	.25
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10/27/17	Call with AMF	.10
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10/27/17	Call with AMF	.15
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10/27/17	Email Chain with JP, KR, SK, AF, AD, TP, TU; Re: MIL Stips	.75
10/27/17	Email Chain with EC, JP, MN, AD, TP, KR; Re: Expert Depositions	.40
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10/30/17	Receive, Review and Analyze Email from Client	.25
10/30/17	Receive, Review and Analyze Emails from Client	.65
10/30/17	Draft and send email to AF re new written discovery to Viking and review AF response	.20
10/30/17	Review Viking Opposition to Motion to Exclude Carnahan & Prepare for hearing	3.25
10/30/17	Email Chain with JP, AF; Re: Olivas deposition	.40
10/30/17	Email Chain with JP, AF; Re: Carnahan Production	.35
10/30/17	Email Chain with SK, AF, AD, TU, MN, JP; Re: DCRR 10/4/17	.15

10/30/17	Call with AMF	.25
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10/31/17	Call with Client	.10
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11/1/17	Discussion with Zamiski Re: Depo/Billing	.50
11/1/17	Revise Opposition to Zurich Motion for Protective Order	2.75
11/1/17	Email Chain with AF, JP; Re: Excess Policy	.15
11/1/17	Email Chain with KR, AF, JP, SK; Re: Depositions	.25
11/1/17	Email Chain with AF, KR, JP, SK; Re: Written Discovery	.25
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11/1/17	Draft and Send Email to Client	.15
11/1/17	Receive, Review and Analyze Email from Client with Attachment	.15
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11/10/17	Email Chain with F. Hale, JP, MC, KR; Re: Mediator Proposal	.25
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11/13/17	Review Viking Motion for MSC and Stay all Rulings; Discussion with AF; Review Letter to DC Bulla; Telephone Conference with Floyd Hale; Telephone Conference with J. Olivas Re: Deposition	2.25
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11/27/17	Receive, Review and Analyze Email From JO; Re: Final Invoice	.25
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11/27/17	Email Chain with Bess White, TP, JP; Re: Edgeworth MOT for Summary Judgement	.35
11/27/17	Receive, Review and Analyze Email from Client	.15
11/27/17	Draft and Send Email to Client	.15
11/27/17	Receive, Review and Analyze Email from Client	.15
11/27/17	Draft and Send Email to Client	.25
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11/27/17	Draft and send email to AF re Carnahan depo and review AF response	.15
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11/28/17	Email Chain with EN, JP, KR, DP; Re: Letter from Parker	.50
11/28/17	Review Lange letter (11/28/17), analyze; discussion with AF	1.25
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11/28/17	Conference call with Judge Bulla chambers w/ Pancoast to reset December 1 st hearings to December 20 th and call with Pancoast separately	.50
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11/29/17	Email Chain with JP, AF; Re: Discovery Motions	.15

11/29/17	Draft and send email to AF re drafting reply to Lange's supplemental Opposition	1.50
11/29/17	Draft and send email to AF re drafting notice of attorney lien	.15
11/29/17	Draft and send email to AF re letter from Pancoast to Simon	.15
11/29/17	Review and analyze Lange's supplemental brief	2.50
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12/1/17	Review Viking's 19 th ECC Supplement	.25
12/4/17	Received and reviewed DCRR; L/M for Green/Vannah	.75
12/4/17	Review notice vacating UL Depos	.25
12/4/17	Discussion with AF	.40
12/5/17	T/c with John Green; Email from John Green; Discussion with staff	.40
12/5/17	Review subpoena to Dalacas	.25
12/5/17	Emails to client and John Greene messages	.50
12/5/17	Draft and Send Email to Client and Response	.15
12/6/17	Draft and send email to AF re notice to vacate Caranahan depo	.15
12/6/17	Review file and gather materials requested by Vannah; email from John Greene	2.25
12/6/17	Email from AF re evidentiary hearing from Judge Jones law clerk and discussion with AF	.50
12/6/17	Review notice of vacating depo of Carnahan	.35
12/6/17	Receive and review email from Janet Pancoast; discussion with AF; response; forward to Vannah	.35
12/6/17	Received and reviewed Lange's 13 th ECC Supplement	.50
12/6/17	Email Chain with JP, AF; Re: Carnahan Deposition	.15
12/7/17	Email Chain with JP, AF, TP, KR, JM, JH, DP, SM; Re: Evidentiary Hearing	.35
12/7/17	T/C with Vannah	.50

12/7/17	Draft and revise letter; Review of file to Vannah w/ attachment	1.75
12/8/17	Received and reviewed Lange 14 th ECC Supplement	1.25
12/8/17	Review Motion for Good faith settlement; discussion with AF	.75
12/8/17	Received and review order granting Giberti Motion for Good Faith Settlement; T/C with Parker	.50
12/8/17	Email chain with AF re Order Granting Giberti MGFS	.15
12/11/17	Email from Zamiski; Response email	.15
12/11/17	Review/ Analyze Lange 15 th ECC Supplement	.50
12/11/17	T/C Parker & Pancoast; Email from T. Parker; Email from Crt	.75
12/11/17	Review client's release of claims; emails to J. Greene; Discussions with AF	.50
12/11/17	Draft and send email to AF re Lange's 15 th ECC Supplement and review AF response	.25
12/12/17	Draft and send email to AF re Stip to Dismiss and review AF response	.15
12/12/17	Attend hearing on Viking Motion for Good Faith Settlement	1.75
12/6/17- 12/12/17	Messages; Returned messages; discussions with Floyd Hale	.50
12/12/17	Email from J. Pancoast; Received/Reviewed/Analyze stip to dismiss; order on Good faith settlement; discussion with AF	1.25
12/12/17	Received letter from Pancoast to DC Bulla; Pancoast email re checks and signing stips	.50
12/14/17	Review both stips to dismiss; send to J. Pancoast; T/C to M. Nunez; Review email from J. Pancoast	.50
12/15/17	Review email from T.Ure; T/C to J. Pancoast re 2 nd stip to dismiss and arrange pick up of settlement checks	.50
12/18/17	Pick up settlement checks; exchange for stip; contact Vannah's office re signature	1.50
12/18/17	T/C and emails to J. Greene re checks; T/C to Pomerantz office re bill; emails; review bills from Pomerantz	1.0

12/18/17	Received, reviewed and analyze email from B. Vannah	.50
12/19/17	Emails to B. Vannah and J. Greene re checks	.25
12/19/17	Received and review email from B. Vannah to J. Christensen; Received and review email from J. Christensen and response from B. Vannah	.25
12/20/17	Request return of sprinklers from Volmer Grey	.25
12/20/17	Receive and review draft Motion for Good Faith Settlement; Lange release for \$100k and release for \$22k	1.50
12/21/17	Review emails from Pancoast and Parker; revise joint motion for good faith settlement and send back to Parker	.75
12/21/17	Receive, review and analyze email from B. Vannah (3:21pm)	.50
12/23/17	Received, reviewed and analyzed email from B. Vannah (10:45pm)	.50
12/26/17	Receive, review and analyze email from J. Christensen to B. Vannah (10:46am)	.25
12/26/17	Receive, review and analyze email from B. Vannah (12:18pm)	.75
12/26/17	Receive, review and analyze email from J. Christensen	.25
12/27/17	Receive, review and analyze email from JC w/e letter attached	.75
12/28/17	Receive, review and analyze email from B. Vannah (3:07pm)	.75
12/28/17	Receive, review and analyze email from B. Vannah (2:03pm)	.25
12/28/17	Receive, review and analyze email from B. Vannah (4:17am)	.75
12/29/17	Received and reviewed email re joint motion and revised joint motion	.40
1/2/18	Revise Lange release and send back to T. Parker	.75
1/2/18	Received/reviewed Viking stip to dismiss	.35
1/2/18	Received/reviewed email from J. Pancoast and T. Parker	.35
1/2/18	Received/reviewed and analyzed letters from Zurich re settlement checks	.25
1/2/18	Received, reviewed and analyzed email from J. Greene (3:45pm)	.25
1/2/18	T/C with S. Guidy at Bank of Nevada	.50

1/3/18	T/C w/ S. Guindy at Bank of Nevada; Received, reviewed and analyzed email with attachments	.75
1/3/18	Analyze , review schedule and additional emails from S. Guindy	.50
1/4/18	Analyze, receive and send emails to S. Guindy at Bank of Nevada; Review Emails from J. Christensen and Bank , J. Greene	.75
1/4/18	Email from T. Parker (E Nunez) re Joint MGFS, sign and return to T. Parker	.50
1/4/18	Email to T. Parker and E. Nunez regarding revisions to release	.50
1/4/18	Travel to Bank of Nevada for bank account requested by client	1.50
1/4/18	Email E. Nunez releases again per her request	.25
1/5/18	Email from S. Guindy and response	.25
1/5/18	Email from Nunez	.15
1/5/18	Review Court filing of MGFS Lange	.25
1/8/18	T/C with S. Guindy; receive, review and analyze letter from Vannah	.50
1/8/18	Travel to Bank of Nevada 2x re Trust deposit	2.5
	Review all Emails concerning service of all pleadings (679 emails)	135.80
	Total Hours	866.20
	Total Fees at \$550 per hour	\$476,410.00

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

DATE	DESCRIPTION	TIME
12.20.16	Review, Download & Save Defendants the Viking Corporation and Supply Network, Inc.'s Substitution of Counsel	0.30
1.4.17	Review, Download & Save Joint Case Conference Report	0.30
1.6.17	Email to DSS re Lange K inserts added to MSJ	0.15
1.9.17	Review email from DSS re phone call to Pancoast	0.15
1.9.17	Review, Download & Save Defendant The Viking Corporation and Supply Network , Inc.'s Demand for Prior Pleadings and Discovery	0.30
1.10.17	Review, Download & Save Plaintiffs Response to Defendants The Viking Corporation and Supply Network Inc.'s Demand for Prior Pleadings and Discovery	0.30
1.11.17	Review email from DSS re making small changes to MSJ	0.15
1.13.17	Review, Download & Save Plaintiffs Motion for Summary Judgment	0.30
1.17.17	Review email from DSS re preparing written discovery and depo notices	0.15
1.17.17	Review email from DSS to Pancoast re moving MSJ hearing and Opp date	0.15
1.18.17	Review, Download & Save Defendant The Viking Corporation and Supply Network, Inc.'s Opposition to Plaintiff's Motion for Summary Judgment	0.30
1.19.17	Email chain with DSS re Viking's Opposition to MSJ	0.50
1.20.17	Email chain with DSS re Stackiewicz case	0.15
1.20.17	Review, Download & Save Notice of Video Deposition of Shelli Lange	0.30
1.20.17	Review, Download & Save Subpoena for Shelli Lange	0.30
1.20.17	Review, Download & Save Notice of Video Deposition Bernie Lange	0.30
1.20.17	Review, Download & Save Subpoena for Bernie Lange	0.30
1.20.17	Review, Download & Save Notice of Video Deposition of Tracey Garvey	0.30
1.20.17	Review, Download & Save Subpoena for Tracy Garvey	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

1.20.17	Review, Download & Save Notice of Video Deposition of Dustin Hamer	0.30
1.20.17	Review, Download & Save Subpoena for Dustin Hamer	0.30
1.20.17	Review, Download & Save Notice of Video Deposition of Vince Diorio	0.30
1.20.17	Review, Download & Save Subpoena for Vince Dioro	0.30
1.23.17	Email to DSS re business court judge	0.15
1.23.17	Email to DSS re draft notices and SDT for review	0.15
1.24.17	Email chain with DSS re business court jurisdiction	0.15
1.24.17	Email chain with DSS re breach of contract COAs	0.25
1.24.17	Review, Download & Save Notice of Deposition of Custodian of Records for American Grating, LLC	0.30
1.24.17	Review, Download & Save Notice of Deposition of Custodian of Records for Giberti Construction, LLC	0.30
1.25.17	Review email chain with client and Janelle from DSS re objections to depositions of COR for American Grating and Giberti Construction	0.15
1.26.17	Email chain with DSS re Lange 30(b)(6) depo	0.25
1.26.17	Review, Download & Save Subpoena for Vince Diorio	0.30
1.26.17	Review, Download & Save Re-Notice of Video Deposition of Vince Diorio	0.30
1.26.17	Review, Download & Save Re-Notice of Video Deposition of Dustin Hamer	0.30
1.26.17	Review, Download & Save Subpoena for Dustin Hamer	0.30
1.26.17	Review, Download & Save Subpoena Duces Tecum 30b6 Lange Plumbing LLC	0.30
1.26.17	Review, Download & Save Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Defendant Lange Plumbing, LLC	0.30
1.27.17	Review email from DSS re preparing Viking 30(b)(6) depo notice	0.15
1.30.17	Review, Download & Save Subpoena Duces Tecum for American Grating, LLC	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

1.30.17	Review, Download & Save Plaintiffs NRCP 45 Objections to Defendant The Viking Corp Subpoena Duces Tecum Directed to the Custodian of Records for American Grating	0.30
2.1.17	Review, Download & Save SUBP Subpoena Duces Tecum for Giberti Construction, LLC	0.30
2.1.17	Review, Download & Save Lange Plumbing's Response to The Viking Corp Demand for Prior Pleadings and Discovery	0.30
2.2.17	Review, Download & Save Defendant Lange Plumbing's Opposition to Plaintiff Motion for Summary Judgment	0.30
2.2.17	Review, Download & Save Subpoena for Bernie Lange	0.30
2.2.17	Review, Download & Save Re-Notice of Video Deposition of Bernie Lange	0.30
2.2.17	Review, Download & Save Subpoena for Shelli Lange	0.30
2.2.17	Review, Download & Save Re-Notice of Video Deposition of Shelli Lange	0.30
2.2.17	Review, Download & Save Subpoena for Dustin Hamer	0.30
2.6.17	Review email from DSS re email client sent re trailer temperatures and link	0.50
2.6.17	Email chain with DSS re Motion to Amend Complain	0.15
2.7.17	Review email from DSS re Viking 30(b)(6) notice	0.15
2.9.17	Review, Download & Save Correspondence	0.30
2.10.17	Review, Download & Save Correspondence to Daniel Simon Esq.	0.30
2.10.17	Email chain with DSS re response to Pancoast re Dustin Hamer	0.15
2.10.17	Review email chain from DSS re correspondence from Sia about moving depositions	0.15
2.10.17	Review email from DSS to Sia re moving depositions	0.15
2.10.17	Review email chain with Sia, Pancoast and DSS re Lange employee Depo dates	0.15
2.12.17	Email chain with DSS re re-noticing depositions of Hamer and Diorio	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

2.13.17	Email chain with DSS re court's availability for MSJ hearing	0.15
2.13.17	Review, Download & Save Plaintiffs Motion to Amend the Complaint on OST	0.30
2.13.17	Review, Download & Save Subpoena for Dustin Hamer	0.30
2.13.17	Review, Download & Save Re-Notice of Video Deposition of Dustin Hamer	0.30
2.13.17	Review, Download & Save Subpoena for Vince Diorio	0.30
2.13.17	Review, Download & Save Re-Notice of Video Deposition of Vince Diorio	0.30
2.15.17	Review, Download & Save Subpoena for Vince Dioro	0.30
2.15.17	Review, Download & Save Notice of Video Deposition of Virginia Brooks Duces Tecum	0.30
2.15.17	Review, Download & Save Subpoena for Virginia Brooks	0.30
2.15.17	Review, Download & Save Notice of Video Deposition of Jim Kreason Duces Tecum	0.30
2.15.17	Review, Download & Save Subpoena Duces Tecum for Jim Kreason	0.30
2.15.17	Review, Download & Save Notice of Continuation Video Deposition of Vince Diorio	0.30
2.15.17	Review, Download & Save Notice of Video Deposition of Brandon Lange	0.30
2.15.17	Review, Download & Save Subpoena for Brandon Lange	0.30
2.15.17	Review, Download & Save Re-Notice of Video Deposition of Bernie Lange	0.30
2.15.17	Review, Download & Save Subpoena for Bernie Lange	0.30
2.15.17	Review, Download & Save Re-Notice of Video Deposition of Shelli Lange	0.30
2.15.17	Review, Download & Save Subpoena for Shelli Lange	0.30
2.15.17	Review, Download & Save Plaintiffs First Supplement to Early Case Conference Witness and Exhibit List	0.30
2.15.17	Review email and attachment from DSS re document needing to be supplemented	0.25
2.15.17	Review email from DSS re noticing depositions of Lange employees	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

2.21.17	Email chain with DSS re exhibits for Dustin Hamer depo	0.15
2.21.17	Review Email and download deposition exhibits 1-8 from Oasis	0.25
2.21.17	Review, Download & Save Defendant Lange Plumbing, LLC's Limited Opposition to Plaintiff's Motion to Amend Complaint on Order Shortening	0.30
2.21.17	Review, Download & Save Scheduling Order	0.30
2.22.17	Review, Download & Save Defendant Lange Plumbing, LLC's Third Supplement to NRCP 16.1 Early Case Conference List of Witnesses and Documents	0.30
2.23.17	Review, Download & Save Subpoena for Virginia Brooks	0.30
2.23.17	Review, Download & Save Re-Notice of Video Deposition of Virginia Brooks Duces Tecum	0.30
2.23.17	Review, Download & Save Re-Notice of Video Deposition of Jim Kreason Duces Tecum	0.30
2.23.17	Review, Download & Save Subpoena for Jim Kreason	0.30
2.23.17	Review, Download & Save Re-Notice of Video Deposition of Shelli Lange	0.30
2.23.17	Review, Download & Save Subpoena for Shelli Lange	0.30
2.23.17	Review, Download & Save Notice of Vacating Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Defendant Lange Plumbing, LLC	0.30
2.23.17	Review, Download & Save Notice of Vacating Video Deposition of Tracey Garvey	0.30
2.23.17	Review, Download & Save Subpoena for Vince Diorio	0.30
2.23.17	Review, Download & Save Re – Notice of Continuation Video Deposition of Vince Diorio	0.30
2.26.17	Email to DSS re draft reply to motion to amend	0.15
2.27.17	Email chain with DSS re COR Depos for Giberti and American Grating	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

2.27.17	Review Email and download deposition from Oasis Reporting (Diorio)	0.25
2.27.17	Review Email and download deposition from Oasis Reporting (Hamer)	0.25
2.27.17	Review, Download & Save Reply to Defendant Lange Plumbing, LLC 's Limited Opposition to Plaintiffs' Motion to Amend the Complaint on OST	0.30
2.28.17	Review, Download & Save Reply to all Defendants Opposition to Plaintiffs Motion for Summary Judgment	0.30
2.28.17	Review email from DSS to Pancoast re documents for COR depositions of Giberti and American Grating	0.15
2.28.17	Call with DSS	0.10
2.28.17	Call with DSS	0.15
2.28.17	Call with DSS	0.15
3.1.17	Email to DSS re Pancoast coming to office to review documents	0.15
3.1.17	Call with DSS	0.15
3.1.17	Review, Download & Save Order Setting Civil Jury Trial	0.30
3.1.17	Email to DSS re Edgeworth trial order	0.15
3.6.17	Review, Download & Save Plaintiffs Second Supplement to Early Case Conference Witness and Exhibit List	0.30
3.7.17	Review, Download & Save Plaintiffs' Motion for Summary Judgment Against Lange Plumbing, LLC, Only	0.30
3.7.17	Review, Download & Save Offer of Judgment to Lange Plumbing, LLC	0.30
3.7.17	Review, Download & Save AOS	0.30
3.7.17	Review, Download & Save Initial Appearance Fee Disclosure of American Grating	0.30
3.7.17	Review, Download & Save Correspondence to Daniel Simon Esq.	0.30
3.7.17	Review, Download & Save Second Amended Complaint	0.30
3.7.17	Email to Pancoast and Sia re draft order to amend complaint and draft order for MSJ	0.15
3.7.17	Email chain with Sia re calculation of damages and depo of Brandon Lange	0.15
3.10.17	Email chain with Sia re signature pages for order to amend and Order on MSJ	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

3.10.17	Email chain with DSS re letter from Sia on withdrawing MSJ and her signature on proposed orders	0.25
3.10.17	Review, Download & Save Correspondence to Daniel Simon Esq.	0.30
3.13.17	Review, Download & Save Notice of Vacating Continuation Video Deposition of Vince Doro	0.30
3.13.17	Review, Download & Save Re-Notice of Video Deposition of Brandon Lange	0.30
3.13.17	Review, Download & Save Subpoena for Brandon Lange	0.30
3.13.17	Review, Download & Save Re-Notice of Video Deposition of Brandon Lange	0.30
3.13.17	Review, Download & Save Subpoena for Brandon Lange	0.30
3.15.17	Review, Download & Save Correspondence to Daniel Simon, Esq.	0.30
3.15.17	Review, Download & Save Defendant Lange Plumbing's 4 th Supplemental Disclosure	0.30
3.16.17	Review, Download & Save Order Denying Plaintiffs Motion for Summary Judgment	0.30
3.17.17	Email chain with DSS re extension for Lange's response to OOJ	0.25
3.17.17	Email chain with Sia re OOJ and extension of time to respond	0.15
3.20.17	Review, Download & Save Notice of Entry of Order Denying Plaintiffs Motion for Summary Judgment	0.30
3.20.17	Review email from DSS to Sia re bate-stamping our exhibits in ECC Supplements	0.15
3.21.17	Email chain with Sia re bate-stamping ECC productions	0.15
3.21.17	Email chain with DSS re documents attached to supplement and review of the Kinsale file	0.15
3.21.17	Review, Download & Save Order Granting Plaintiffs Motion to Amend the Complaint	0.30
3.21.17	Review, Download & Save Requests for Production of Documents to Edgeworth Family Trust	0.30
3.21.17	Review, Download & Save Interrogatories to Edgeworth Family Trust	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

3.21.17	Review, Download & Save Plaintiffs Third Supplement to Early Case Conference Witness and Exhibit List	0.30
3.22.17	Review, Download & Save Lange Plumbing's 5 th Supplemental Disclosures	0.30
3.22.17	Review, Download & Save Notice of Entry of Order Granting Plaintiff's Motion to Amend the Complaint	0.30
3.22.17	Review, Download & Save Lange's First Requests for Production of Documents to The Viking Corp.	0.30
3.22.17	Review, Download & Save Lange's First Interrogatories to The Viking Corp.	0.30
3.23.17	Review email and download deposition from Oasis Reporting (Bernie Lange)	0.25
3.24.17	Review email from DSS to Sia re service of Amended Complaint on Lange	0.20
3.24.17	Review, Download & Save Correspondence to Daniel Simon, Esq.	0.30
3.27.17	Review, Download & Save Notice of Vacating Video Deposition of Virginia Brooks Duces Tecum Outside the State of Nevada	0.30
3.27.17	Review, Download & Save Plaintiffs 4 th Supplement to Early Case Conference Witness and Exhibit List	0.30
3.29.17	Review, Download & Save Stipulation and Order to Continue Plaintiffs Motion for Summary Judgment Against Lange Plumbing, LLC Only	0.30
3.29.17	Call with DSS	0.15
3.29.17	Call with DSS	0.10
3.31.17	Call with DSS	0.15
3.31.17	Review, Download & Save Subpoena for PMK of The Viking Corporation	0.30
3.31.17	Review, Download & Save Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Viking Corporation	0.30
4.4.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Answer to Plaintiffs' Second Amended Complaint & Third Party Complaint Against Giberti Construction LLC	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

4.5.17	Review, Download & Save Defendant / Third – Party Plaintiffs The Viking Corp and Supply Network, Inc.’s Initial Appearance Fee Disclosure [Third Party Complaint]	0.30
4.5.17	Email chain with DSS re exhibits he needs for Kreason and Brandon Lange depo	0.15
4.6.17	Review email from DSS re preparing 3 day notice of intent to default Lange	0.15
4.6.17	Review, Download & Save Correspondence	0.30
4.6.17	Review email from DSS to Sia re testing heads	0.15
4.7.17	Review, Download & Save Plaintiffs 5 th Supplement to Early Case Conference Witness and Exhibit List	0.30
4.7.17	Review, Download & Save Defendant Lange Plumbing, LLC’s Opposition to Plaintiff’s Motion for Summary Judgment	0.30
4.11.17	Review, Download & Save Notice of Intent to Enter Default Against Lange Plumbing, LLC	0.30
4.11.17	Review, Download & Save Notice of Deposition of Custodian of Records for Rimkus Consulting, Group , Inc.	0.30
4.12.17	Review, Download & Save Defendant Lange Plumbing’s Answer to Plaintiff’s Second Amended Complaint and Cross Claim	0.30
4.13.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.’s Requests for production to Lange Plumbing, LLC	0.30
4.13.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.’s Requests for Admission to Lange Plumbing Inc.	0.30
4.13.17	Review, Download & Save Defendants The Viking Corporation Supply Network, Inc.’s Requests for production to Plaintiffs	0.30
4.13.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.’s Requests for Admission to Plaintiffs	0.30
4.13.17	Review, Download & Save Subpoena Duces Tecum of Designees of Viking Automatic Sprinkler Co.	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

4.13.17	Review, Download & Save Second Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Viking Corporation	0.30
4.13.17	Review email chain from DSS requesting I re-notice depo of Viking 30(b)(6)	0.20
4.14.17	Review, Download & Save The Viking Corporation and Supply Network, Inc.'s Joinder with Additional Points and Authorities to Lange's Opposition to Plaintiff's Second Motion for Summary Judgment	0.30
4.17.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Interrogatories to Plaintiffs	0.30
4.17.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Interrogatories to Lange Plumbing, LLC	0.30
4.18.17	Review, Download & Save Plaintiffs' Reply to Motion for Summary Judgment Against Lange Plumbing Only	0.30
4.18.17	Review email from DSS to Sia re Kreason no show at depo	0.15
4.18.17	Review email from DSS re dropping off cc to Judge of Motion to compel Kreason	0.15
4.18.17	Review email and download deposition from Oasis Reporting (Brandon Lange and Non-Appearance of Kreason)	0.25
4.18.17	Review email and respond to email from Bill LaBorde with Oasis re rough transcript	0.15
4.20.17	Review email from Sia re testing of heads	0.20
4.21.17	Review email from DSS to Sia and Janet re testing protocol in writing	0.15
4.23.17	Review email from DSS requesting I do research on the contract prior to the MSJ hearing	0.15
4.24.17	Review email from DSS requesting I pull 3 rd party complaint Lange filed against Viking	0.15
4.24.17	Review, Download & Save Plaintiff Edgeworth Family Trust's Responses to Defendant's Interrogatories	0.30
4.24.17	Review, Download & Save Plaintiff Edgeworth Family Trust's Responses to Defendant's Request for production	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

4.25.17	Review email from DSS requesting I email 3 rd party complaint Lange filed against Viking	0.15
4.26.17	Review, Download & Save Notice of The Continued Deposition of Vincent Diorio	0.30
4.27.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Responses to Defendant Lange Plumbing, LLC's Request for Production of Documents	0.30
4.27.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Answers to Defendant Lange Plumbing LLC's Interrogatories	0.30
4.27.17	Review, Download & Save The Viking Corp and Supply Network, Inc.'s Objection to Subpoena	0.30
4.27.17	Review, Download & Save Correspondence	0.30
4.27.17	Review, Download & Save Plaintiffs 1 st Set of Interrogatories to Defendants The Viking Corporation	0.30
4.27.17	Review, Download & Save Plaintiffs' 1 st Set of Request for Admission to Defendants The Viking Corporation	0.30
4.27.17	Review email from DSS requesting draft notice of depo and SDT for Dan Cadden	0.15
4.27.17	Review email from DSS re what motions we need to file in Edgeworth and begin drafting	0.20
4.27.17	Email chain with DSS and JW re written discovery for Viking	0.15
4.27.17	Review email from DSS re pulling invoices from Viking to Lange showing heads purchased	0.15
4.27.17	Email chain between DSS, client and AF re drafting Viking SupplyNet notice	0.15
4.27.17	Review email from DSS re forward from client	0.40
4.28.17	Email chain with DSS re American Grating ECC and EFT Supp	0.15
4.28.17	Review email from DSS to Sia re lack of written protocol for testing	0.15
5.1.17	Review email and attachment from DSS re Viking's 2 nd Supp	0.50

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

5.1.17	Review, Download & Save Plaintiffs' Motion for an Order to Show Cause and Compel James Kreason to Appear for Deposition	0.30
5.1.17	Review, Download & Save The Viking Corp and Supply Network, Inc.'s Request to Observe all Inspections and / or Testing Performed by any Party	0.30
5.1.17	Review, Download & Save SDT for Dan Cadden	0.30
5.1.17	Review, Download & Save Notice of Video Deposition of Dan Cadden	0.30
5.1.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Second Supplemental Disclosures Pursuant to NRCp 16(a)(1)	0.30
5.2.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc 3 rd Supplemental Disclosure Pursuant to NRCp 16 (a)(1)	0.30
5.2.17	Email chain with DSS requesting Viking 30(b)(6) notice, 3 rd party complaint and amended complaint emailed and printed	0.20
5.3.17	Review email and attachment from client re ISTA Temperature Report	0.15
5.3.17	Email chain with attachments from DSS forwarded from Hastings and Viking supply invoices and print for DSS	0.25
5.4.17	Review, Download & Save Plaintiffs' Motion to Compel the Deposition to Defendant Lange Plumbing, LLC 's 30b6 Designee and for Sanctions	0.30
5.4.17	Review, Download & Save SDT	0.30
5.4.17	Review, Download & Save Plaintiff American Grating, LLC's Early Case Conference Witness and Exhibit List	0.30
5.5.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC 's 6 th Supplement to Early Case Conference Witness and Exhibit List (Doc provided by CD)	0.30
5.5.17	Email to Pancoast and Sia re hearing dates	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

5.5.17	Email chain with Sia re names of other Lange employees who were at Edgeworth home	0.25
5.5.17	Email chain with DSS and Janelle re June 7 th hearing	0.15
5.5.17	Review email and attachment from DSS to Bullock re 3 rd party complaint	0.20
5.5.17	Review email and attachments from DSS that were forwarded from client re gate entries	0.25
5.8.17	Review email from Sia re draft order for denial of MSJ	0.15
5.8.17	Email to Sia and Pancoast re draft SAO to continue hearing and motion to compel Kreason	0.15
5.8.17	Review, Download & Save SDT of Supply Network Inc. dba Viking Supplynet	0.30
5.8.17	Review, Download & Save -Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Supply Network, Inc. dba Viking Supplynet	0.30
5.8.17	Review, Download & Save Summons with Affidavit of Service – Giberti	0.30
5.8.17	Review, Download & Save Plaintiffs 1 st Set of Request for Production to Defendant Lange Plumbing LLC	0.30
5.8.17	Review, Download & Save Plaintiffs 1st set of Request for Admission to Defendant Lange Plumbing, LLC	0.30
5.8.17	Review, Download & Save Plaintiffs 1 st Set of Interrogatories to Defendants Lange Plumbing, LLC	0.30
5.8.17	Review, Download & Save Plaintiff Edgeworth Family Trust's Responses to Defendant's Request for Admissions	0.30
5.8.17	Review, Download & Save Plaintiff Edgeworth Family Trust's Answers to Defendant's Interrogatories	0.30
5.8.17	Review, Download & Save SPlaintiff Edgeworth Family Trust's Responses to Defendant's Request for Production	0.30
5.8.17	Review, Download & Save ROC for Lange Plumbing's Motion to Compel	0.30
5.9.17	Review email from DSS re reference to Edgeworth house	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

5.10.17	Review, Download & Save Notice of Deposition of PMK for State Insulation, LLC	0.30
5.11.17	Review, Download & Save Notice Vacating Deposition of Custodian of Records for Rimkus Consulting Group, Inc.	0.30
5.11.17	Email chain with DSS re Mason depo scheduling	0.15
5.11.17	Email chain with DSS re weather expert	0.15
5.11.17	Email to Sia re missing pages from Lange's Motion to Compel release of sprinklers	0.15
5.11.17	Email chain with Janet re Edgeworth home inspection and discussion with DSS	0.25
5.12.17	Email to Janet re proposed stipulated protective order	0.15
5.12.17	Email to Olivas with additional documents for his review	0.15
5.15.17	Email chain with DSS re Opp to Lange's motion to compel sprinkler heads	0.15
5.15.17	Review, Download & Save Defendant /Third Party Plaintiffs The Viking Corp and Supply Network, Inc.'s Requests for Inspection	0.30
5.15.17	Review, Download & Save Plaintiffs' Opposition to Defendant Lange Plumbing, LLC's Motion to Compel Plaintiffs to Release Sprinkler Heads for Testing by Lange Plumbing, LLC on OST	0.30
5.17.17	Review, Download & Save Correspondence to Discovery Commissioner Bulla	0.30
5.17.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc's 4 th Supplemental Disclosures Pursuant to NRCp 16(a)(1)	0.30
5.17.17&5.18.17	Email chain with DSS, Sia and AF re extension of Lange's Opp to MSJ	0.25
5.18.17	Email chain with Sia re SAO regarding briefing schedule	0.25
5.19.17	Review, Download & Save Defendants / Third Party Plaintiffs The Viking Corporation and Supply Network, Inc.'s Notice of Inspection	0.30
5.19.17	Review email from Tashia Garry re Viking notice of inspection	0.15

INVOICE FOR ASHLEY M. FERREL
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5.19.17	Review email and download deposition from Oasis Reporting (Martorano)	0.25
5.19.17	Review email from DSS to Sia and Pancoast re testing on June 22 nd	0.15
5.22.17	Review email from DSS re returning Amanda Kern call from City of Henderson	0.15
5.22.17	Email chain with DSS re changes to DCRR	0.15
5.23.17	Email chain with Sia re proposed DCRR from May hearing	0.25
5.23.17	Review, Download & Save Subpoena for Erik C. Johnson	0.30
5.23.17	Review, Download & Save Notice of Deposition of Erik C. Johnson	0.30
5.24.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Answer to Lange Plumbing, LLC's Amended Cross – Claim and Amended Counter- Claim	0.30
5.24.17	Email to client re Rimkus Consulting documents	0.15
5.24.17	Email to Hastings with additional documents for his review	0.15
5.24.17	Review email from client re Rimkus documents and response	0.25
5.24.17	Review email from DSS re professors for weather expert	0.15
5.25.17	Review email from Sia requesting Plaintiff's motion to compel Lange 30(b)(6) depo	0.20
5.25.17	Review, Download & Save Defendant the Viking Corp and Supply Network. Inc's Answers to Plaintiff's Request for Admissions	0.30
5.26.17	Email chain with DSS re Sia's email to withdraw MSJ; and subsequent review of DSS response to Sia	0.15
5.29.17	Review email chain between DSS and Pancoast re extension on Viking rog responses	0.15
5.30.17	Email chain with DSS re start time of 6/22/17 testing; subsequent email chain with Sia re timing	0.25
5.30.17	Email chain with Sia and Pancoast re start time of destructive testing	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

5.30.17	Email chain with Pancoast and Sia re names of people attending inspection at Edgeworth residence	0.15
5.30.17	Email chain re retaining Don Koch as expert and retainer agreement	0.25
5.30.17	Email chain with DSS re weather expert mike Schwob	0.15
5.30.17	Review email from DSS re preparation of expert designation	0.15
5.30.17	Email chain with DSS re Stipulated Protective Order	0.25
5.31.17	Email chain with DSS re draft of Reply to limited Opp to Motion to Compel Kreason	0.15
5.31.17	Review email chain from DSS to Pancoast re State Insulation depo	0.15
5.31.17	Review, Download & Save Proof of Service	0.30
5.31.17	Review, Download & Save Notice of Vacating Deposition of PMK of State Insulation, LLC	0.30
6.1.17	Review email from DSS re book (Real Estate Damages) to be ordered	0.15
6.1.17	Review email from DSS to Pancoast re inspection of Viking SupplyNet warehouse	0.15
6.1.17	Email chain with Sia, Pancoast re changes to the protective order	0.75
6.1.17	Review email from Sia re Lange's Opp to Planitiff's Motion to Compel	0.15
6.1.17	Review, Download & Save Defendant Lange Plumbing, LLC's Opposition to Plaintiff's Motion to Compel the Deposition of Defendant Lange Plumbing, LLC's 30b6 Designee and for Sanctions and Countermotion for Sanctions	0.30
6.1.17	Review, Download & Save SDT – of Supply Network, Inc. dba Viking Supplynet	0.30
6.1.17	Review, Download & Save Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Suplepy Network, Inc. dba Viking Supplynet (Date Change Only)	0.30
6.1.17	Review, Download & Save Supply Network, Inc.'s Objection to Subpoena	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

6.2.17	Review, Download & Save Defendant Lange Plumbing, LLC 's Limited, LLC's Limited Opposition to Plaintiffs' Motion for an Order to Show Cause and Compel James Kreason to Appear for Deposition	0.30
6.2.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc.'s Answers to Plaintiffs Interrogatories	0.30
6.2.17	Review, Download & Save Lange's Responses to Viking's Requests for Production	0.30
6.2.17	Review, Download & Save Lange's Responses to Viking's Requests for Admission	0.30
6.2.17	Review, Download & Save Lange's Plumbing's Answers to Viking's Interrogatories	0.30
6.2.17	Review and respond to email from Jason Reeve re Don Koch agreement	0.25
6.2.17	Review email from client re preparing for Viking inspection	0.15
6.2.17	Email chain with DSS re producing prior pleadings to Nunez	0.15
6.2.17	Call with Client	0.15
6.2.17	Call with Client	0.15
6.2.17	Call with Pancoast	0.15
6.2.17	Call with Client	0.10
6.2.17	Call with DSS	0.15
6.5.17	Email chain with DSS re Reply to Compel Lange 30(b)(6)	0.15
6.5.17	Email chain with DSS and Pancoast re inspection email sent to Pancoast and follow up	0.25
6.5.17	Email chain with Pancoast re Inspection of Viking Supplynet	0.15
6.5.17	Review, Download & Save to Defendant Lange's Opposition to Plaintiffs' Motion to Compel the Deposition of Defendant Lange Plumbing, LLC's 30b6 Designee and for Sanctions	0.30
6.6.17	Review and respond to email from Sia re Dan Cadden Depo	0.15
6.6.17	Review, Download & Save CERT of Mailing of Notice of Hearing for Motion to Compel Kreason	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

6.6.17	Review, Download & Save Notice of Hearing for Motion to Compel Kreason	0.30
6.6.17	Review, Download & Save CERT of Mailing of Notice of Hearing for Motion to Compel Lange Plumbing 30b6	0.30
6.6.17	Review, Download & Save Notice of Hearing for Motion to Compel Lange Plumbing 30b6	0.30
6.6.17	Review, Download & Save Plaintiff's Notice of Entry Upon Land/Site Inspection	0.30
6.6.17	Email chain with Janet, Sia, Nunez re Johnson depo dates	0.15
6.6.17	Review email from client re deposition questions client would like asked	0.50
6.6.17	Review email and attachment from client re Viking's inconsistent labeling	0.25
6.6.17	Review email and attachment from client re Viking box with production date on it	0.15
6.6.17	Email chain with client and Doug Purvis re meeting with Koch	0.15
6.6.17	Review email and link from DSS re UPS petition and notice of 30(b)(6)	0.40
6.7.17	Review, Download & Save DCRR	0.30
6.7.17	Review email from DSS re Johnson depo exhibits and response	0.15
6.8.17	Email chain with DSS re COR Depo of City of Henderson	0.15
6.8.17	Review email from client re skylights in the Supplynet building	0.15
6.8.17	Review email from client re other residences that took a long time from rough to final and then research of houses to get square footage	1.50
6.8.17	Review email and attachment from client re client's summary of Viking's false testimony based off of depo from Martorano	2.0
6.9.17	Review, Download & Save Subpoena Duces Tecum Lange Plumbing, LLC	0.30
6.9.17	Review, Download & Save Notice of Second Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Lange Plumbing, LLC	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

6.9.17	Review, Download & Save Subpoena Duces Tecum of Custodian of Records for City of Henderson, Building Department	0.30
6.9.17	Review, Download & Save Notice of Taking the Deposition of Custodian of Records for the City of Henderson Building Department	0.30
6.9.17	Review, Download & Save Subpoena for Kyle Mao	0.30
6.9.17	Review, Download & Save Notice of Video Deposition of Kyle Mao	0.30
6.9.17	Review, Download & Save Subpoena for Erik C. Johnson	0.30
6.9.17	Review, Download & Save Amended Notice of Video Deposition of Erik C. Johnson (Date Change Only)	0.30
6.9.17	Email chain with DSS re name of Viking SupplyNet worker	0.15
6.12.17	Review email from DSS to client re direct sunlight on sprinklers	0.15
6.12.17	Email to Pancoast re confirmation of Diorio depo	0.15
6.12.17	Review email from client requesting Vince Diorio depo and response	0.15
6.12.17	Email chain with client and DSS re direct sunlight in the house	0.25
6.12.17	Review, Download & Save Third Party Defendant Giberti Construction LLC's Demand for Jury Trial	0.30
6.12.17	Review, Download & Save Defendant Giberti Construction LLC's Initial Appearance Fee Disclosure	0.30
6.12.17	Review, Download & Save Third – Party Defendant Giberti Construction LLC's Answer to Defendant/Third – Party Plaintiffs' Third Party Complaint; Counterclaim Against Viking Corp and Supply Network, Inc. dba Viking Supplynet; and Cross – Complaint Against Lange Plumbing, LLC	0.30
6.12.17	Review, Download & Save Lange Plumbing's Responses to Plaintiff's Requests for Admissions	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

6.12.17	Review, Download & Save Lange Plumbing's Responses to Plaintiff's Requests for Production	0.30
6.12.17	Review, Download & Save Lange Plumbing's Answers to Plaintiff's First Set of Interrogatories	0.30
6.12.17	Review, Download & Save Plaintiffs' Amended Notice Entry Upon Land/Site Inspection (Time Change Only)	0.30
6.13.17	Email chain with Hastings re depositions taken in the case and response	0.25
6.13.17	Email chain with Sia and Pancoast re Diorio deposition	0.15
6.13.17	Review email and attachments from client re non visible possible defects	0.50
6.13.17	Email chain with DSS and Hastings re documents	0.15
6.14.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's Request for Prior Pleadings, Discovery, Records and Deposition Transcripts	0.30
6.14.17	Review, Download & Save Lange Plumbing's 6 th Supplemental Disclosure	0.30
6.14.17	Review, Download & Save Amended Notice of Taking the Deposition of Vincent Diorio [TimeOnly]	0.30
6.14.17	Email to client re continuation of Diorio depo	0.15
6.14.17	Review email from Sia re 6.7.17 DCRR	0.15
6.15.17	Review email from Sia re Lange's 6 th ECC Disclosure	0.15
6.15.17	Email chain with Pancoast and Sia re changes to the Protective Order	0.50
6.15.17	Review email from DSS to Pancoast re document production	0.15
6.15.17	Review email from DSS to Hastings re written protocol for testing	0.15
6.15.17	Email to Pancoast and Sia re draft DCRR from 6.7.17 hearing	0.15
6.16.17	Review email from Nicole Garcia re Ure signature pages ready for pick up	0.15
6.16.17	Email to Sia re signature page for 6.7.17 DCRR	0.15
6.16.17	Review email from Zamiski re testing protocol signature page	0.15

INVOICE FOR ASHLEY M. FERREL
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6.16.17	Email chain with DSS re Zamiski's signature page for written protocol for testing	0.15
6.16.17	Review email from DSS re locating document for client	0.15
6.16.17	Email chain with DSS re Giberti's Stip and Order to Extend Discovery	0.15
6.16.17	Review email from DSS to Nunez and Ure re Stip and Order to extend discovery	0.15
6.17.17	Call with DSS	0.10
6.19.17	Email chain with DSS re demand for prior pleadings by Giberti	0.15
6.19.17	Review email chain between DSS, Pancoast, Sia and Nunez re Kreason motion to compel and Kreason depo	0.20
6.19.17	Review email and download deposition from Oasis Reporting (Cadden)	0.25
6.19.17	Email chain with Pancoast re signature page for 6.7.17 DCRR	0.15
6.19.17	Email chain with Don Koch re his visit to the residence and his opinions	0.25
6.20.17	Email chain with Sia re protocol for destructive testing	0.15
6.20.17	Call with DSS	0.15
6.20.17	Email to Bill LaBorder requesting a complete set of depo exhibits	0.15
6.20.17	Email to Sia re who will be attending destructive testing	0.15
6.20.17	Review email and attachment from client re Vince Diorio depo	0.50
6.20.17	Email to Zamiksi re signature for testing protocol	0.15
6.20.17	Email chain with client re destructive testing protocol and response	0.75
6.20.17	Email to Don Koch with additional documents for his review	0.15
6.20.17	Email chain with DSS re phone call with Don Koch	0.15
6.20.17	Email chain with DSS and Janelle re hearing date for Kreason motion to compel	0.15
6.20.17	Email chain between DSS, Pancoast, Sia and Nunez re deposition scheduling of Diorio	0.15
6.20.17	Email chain with DSS re list of exhibits from depositions with attachment	0.15

INVOICE FOR ASHLEY M. FERREL
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6.20.17	Review, Download & Save Lange's 7 th Supplemental Disclosures	0.30
6.20.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s 5 th Supplemental Disclosures Pursuant to NRCP 16(b)(1)	0.30
6.20.17	Review, Download & Save Plaintiffs Response to Third Party Defendant Giberti Construction LLC's Request for Prior Pleadings, Discovery, Records and Deposition Transcripts	0.30
6.20.17	Review, Download & Save Correspondence to DC Bulla regarding the June 21, 2017 Hearing	0.30
6.20.17	Review, Download & Save Subpoena Duces Tecum for Jim Kreason	0.30
6.20.17	Review, Download & Save Re- Notice of Video Deposition of Jim Kreason Duces Tecum	0.30
6.22.17	Review, Download & Save SDT of Supply Network, Inc., dba Viking Supplynet	0.30
6.22.17	Review, Download & Save Second Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30ba of Designees of Supply Network, Inc., dba Viking Supplynet Date Change Only)	0.30
6.22.17	Email to Zamiski and Hatsing re locations of sprinklers from Edgeworth house that will be used during destructive testing	0.15
6.22.17	Email to Zamiski with additional documents for his review	0.15
6.22.17	Call with DSS	0.10
6.22.17	Call with DSS	0.10
6.22.17	Call with DSS	0.15
6.23.17	Call with DSS	0.10
6.23.17	Call with DSS	0.25
6.23.17	Email to Hastings with additional documents for his review	0.15
6.23.17	Review email and attachments from client re nest energy history	0.25
6.23.17	Email chain with DSS and client re downloading and sending screenshots of nest energy history	0.15

INVOICE FOR ASHLEY M. FERREL
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6.26.17	Email chain with DSS re documents for Kreason depo (specifically Rimkus documents)	0.20
6.26.17	Review, Download & Save Giberti Construction, LLC's Motion to Extend Discovery Deadlines on an OST	0.30
6.27.17	Review, Download & Save The Viking Corp and Supply Network, Inc.'s Joinder to Giberti Construction, LLC's Motion to Continue Discovery Deadlines	0.30
6.27.17	Email chain with Pancoast, Sia and Nunez re scheduling of Supplynet PMK Depo	0.25
6.28.17	Email chain with DSS re vacating Kreason Motion to compel	0.20
6.28.17	Email chain with DSS re Kyle Mao depo (my thoughts, exhibits pulled)	1.0
6.28.17	Review, Download & Save SDT of Supply Network, Inc. dba Viking Supplynet	0.30
6.28.17	Review, Download & Save Third Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30b6 of Designees of Supply Network, Inc, Viking Supplynet (Date Change Only)	0.30
6.28.17	Call with DSS	0.10
6.29.17	Review, Download & Save Notice of Change of Address	0.30
6.29.17	Review, Download & Save DCRR	0.30
6.29.17	Review, Download & Save Stipulated protective Order	0.30
6.29.17	Email to Amanda Kern with City of Henderson and attachment re Dan Cadden depo	0.25
6.30.17	Review email from DSS to Pancoast re missing Viking documents	0.20
6.30.17	Review, Download & Save SDT – for Robert Carnahan, P.E.	0.30
6.30.17	Review, Download & Save Notice of Taking Deposition of Robert Carnahan, P.E. Duces Tecum	0.30
6.30.17	Review, Download & Save Subpoena for Raul De La Rosa	0.30
6.30.17	Review, Download & Save Notice of Video Deposition of Raul De La Rosa	0.30

INVOICE FOR ASHLEY M. FERREL
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6.30.17	Review, Download & Save Subpoena – James Cameron	0.30
6.30.17	Review, Download & Save Notice of Video Deposition of James Cameron	0.30
7.3.17	Review email and attachment from client re HVAC shut down at Edgeworth residence	0.25
7.5.17	Review, Download & Save Defendant/Cross Claimant Lange Plumbing, LLC's Response to Third Party Defendant Giberti Construction, LLC's Demand for All Prior Pleadings and Discovery	0.30
7.6.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc.'s 6 th Supplemental Disclosures Pursuant to NRCP 16 (a)(1)	0.30
7.6.17	Email chain with Jessica Rogers re Viking disclosure	0.20
7.6.17	Email to Sia re Lange's expert's raw data	0.15
7.6.17	Email chain with DSS re Lange expert raw data from testing	0.25
7.6.17	Email chain with DSS re sending documents to Hastings	0.15
7.6.17	Email chain with DSS re moving Carnahan depo	0.15
7.7.17	Call with DSS	0.10
7.7.17	Call with DSS	0.25
7.7.17	Email to Sia, Pancoast and Nunez re depo of the COR of Henderson	0.15
7.10.17	Review, Download & Save Correspondence to Commissioner Bulla	0.30
7.10.17	Email chain with Sia re objection to Giberti motion to continue trial	0.15
7.10.17	Email to Hastings with additional documents for his review	0.15
7.10.17	Email to Zamiski with additional documents for his review	0.15
7.10.17	Email chain with client re Viking's production of documents and effect of the protective order	0.25
7.10.17	Email chain with DSS re documents Zamiski requested	0.15
7.10.17	Email chain with DSS re documents Viking produced and what experts need	0.20

INVOICE FOR ASHLEY M. FERREL
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7.10.17	Email and attachment to DSS with important Viking emails from recent production	0.25
7.10.17	Email chain with DSS re Johnson depo exhibits	0.20
7.10.17	Email chain with DSS with attachments re ACORE report and invoice	0.25
7.10.17	Email chain with DSS re Opposition	0.15
7.10.17	Email chain with DSS re Opp to Motion to extend discovery deadlines	0.25
7.11.17	Review, Download & Save Plaintiffs' Opposition to Defendant Giberti Construction, LLC's Motion to Extend Discovery Deadlines on an OST	0.30
7.11.17	Review, Download & Save Supplement to Plaintiffs' Motion to Compel the Deposition Defendant Lange Plumbing, LLC 's 30(b)(6) Designees and for Sanctions	0.30
7.11.17	Review, Download & Save Defendant / Cross Claimant / Cross Defendant Lange Plumbing, LLC's Answer to The Viking Corp and Supply Network's Amended Cross Claim	0.30
7.11.17	Review, Download & Save Defendant / Cross Claimant / Cross Defendant Lange Plumbing, LLC 's Answer to Giberti Construction, LLC's Cross Claim	0.30
7.11.17	Review, Download & Save SDT for Robert Carnahan, P.E.	0.30
7.11.17	Review, Download & Save Amended Notice of Video Deposition of Robert Carnahan, P.E. Duces Tecum	0.30
7.11.17	Review email and attachment from Jessica Rogers re correspondence from Pancoast to DC Bulla	0.25
7.11.17	Email to Hastings with additional documents for his review	0.15
7.11.17	Review email and attachment from DSS re Olivas CV	0.15
7.12.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC's 7 th Supplement to Early Case Conference Witness and Exhibit List	0.30

INVOICE FOR ASHLEY M. FERREL
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7.12.17	Email chain with DSS re revised supplemental JCCR	0.25
7.12.17	Review email from DSS to Nicole Garcia re DCRR re motion to extend discovery	0.15
7.12.17	Email chain with DSS and Zamiski re sprinklers being sent to Vollmer Grey	0.50
7.12.17	Review email from Nicole Garcia re Ure signature pages ready for pick up	0.15
7.12.17	Email to Victoria Boyd (Court reporter) for hearing transcript	0.15
7.13.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc.'s Answer too Giberti Construction, LLC's Counterclaim	0.30
7.13.17	Email chain with Sia re picking up sprinkler heads from Converse Consulting	0.50
7.13.17	Email chain with DSS re Rimkus subpoena for documents	0.15
7.13.17	Review email from DSS re objection to confidentiality of Viking documents and response	0.15
7.14.17	Review email from DSS re Zamiski preparing chain of custody documents and response	0.15
7.14.17	Email chain with DSS re 2 nd Supplement to Lange Motion for sanctions	0.25
7.14.17	Review email from DSS re letter to Sia to be drafted re sanctions	0.75
7.14.17	Email chain with Zamiski re chain of custody documents for sprinkler	0.15
7.14.17	Review, Download & Save Giberti Construction, LLC's Mtn. to Extend Discovery Deadlines on OST	0.30
7.14.17	Review, Download & Save Second Supplement to Plaintiffs' Motion to Compel the Deposition of Defendant Lange Plumbing, LLC's 30(b)(6) Designee and for Sanctions	0.30
7.17.17	Review, Download & Save Plaintiffs' Opposition to Defendant Giberti Construction, LLC's Motion to Extend Discovery Deadlines on an OST	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

7.17.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc.'s First Supplemental Answers to Plaintiffs' Interrogatories	0.30
7.17.17	Review email from Sia re DC ruling on Lange sanctions	0.15
7.17.17	Email chain with DSS re Giberti motion to extend discovery	0.15
7.18.17	Email chain with DSS re notice of 2.34 with Viking re deficient discovery responses	0.15
7.18.17	Email to Sia re Simon Law W9	0.15
7.18.17	Email chain with Pancoast re signature page for amended JCCR	0.15
7.18.17	Email chain with DSS re objection to confidentiality and response	0.25
7.18.17	Review email from DSS re printing all discovery responses	0.15
7.18.17	Review email and attachment from DSS re Caranahan depo and SDT and response	0.25
7.18.17	Review, Download & Save Letter to D. Simon from J. Pancoast	0.30
7.18.17	Review, Download & Save Notice of Telephonic 2.34 Conference with Viking Defendants	0.30
7.19.17	Review, Download & Save Plaintiffs' Objection to Confidentiality Designation Pursuant to the Protective Order	0.30
7.19.17	Review, Download & Save Issued Commission to Take Out of State Deposition of Robert Carnahan, P.E.	0.30
7.19.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Robert Carnahan	0.30
7.19.17	Review, Download & Save Subpoena Duces Tecum for Robert Carnahan , P.E.	0.30
7.19.17	Review, Download & Save Second Amended Notice of Video Deposition of Robert Carnahan, P.E. Duces Tecum	0.30
7.19.17	Email chain with DSS re Lange's 8 th supplement and raw data from destructive testing	0.20
7.19.17	Email to client with summary chart of all emails from Viking	0.15
7.19.17	Review email from Sia re Lange's 8 th ECC Supp and attachments	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

7.19.17	Email to Hastings with additional documents for his review	0.15
7.19.17	Email to Zamiski with additional documents for his review	0.15
7.19.17	Review email from client re depo testimony about test results at 190 degrees	0.15
7.19.17	Review email from client requesting Martorano depo and response	0.15
7.19.17	Review email from DSS to client re Viking rep depo	0.15
7.19.17	Email chain with DSS re Sia's changes to the DCCR re Lange's sanctions	0.50
7.19.17	Review email from DSS re checking production to make sure we have produced proper documentation for all damages	0.15
7.20.17	Review email chain between DSS and Pancoast re EDCR 2.34 re deficient discovery responses	0.20
7.20.17	Review, Download & Save Letter to Attorney Simon re EDCR 2.34 Notice	0.30
7.20.17	Review, Download & Save Lange Plumbing's 8 th Supplemental Disclosures	0.30
7.21.17	Review, Download & Save The Viking Corporation and Supply Network, Inc.'s Joinder to Giberti Construction, LLC's Motion to Continue Discovery Deadlines	0.30
7.21.17	Review email from DSS to Pancoast re meet and confer	0.20
7.21.17	Email chain with attachment with DSS re documents being sent to expert	0.25
7.21.17	Email to Hastings requesting the readings for the Edgeworth home	0.15
7.21.17	Email to Don Koch re status of report	0.15
7.21.17	Review email from client re Viking giving us info on all sprinkler heads	0.15
7.21.17	Review email and link from client re Viking v. Harold Rodgers case in CA and response	0.50
7.22.17	Email to Don Koch with additional documents for his review	0.15
7.23.17	Review email and attachments from client re Viking tests	0.50
7.23.17	Review email from client re his opinion on the Vollmer gray report	0.25
7.23.17	Review email from client re UL 1626 bath test	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

7.24.17	Review, Download & Save J. Pancoast Letter to D. Simon	0.30
7.24.17	Review and respond to Rush Porter re Kevin Hasting's CV and testimony list	0.15
7.24.17	Email to Hastings requesting his CV for his report	0.15
7.24.17	Email chain to Don Koch re model from Purvis	0.25
7.24.17	Email chain with client re Harold Rogers contact	0.25
7.24.17	Review email and dropbox link from client re another VK457 failure	0.50
7.24.17	Review email from client re facts about attic we should know and analysis	0.25
7.24.17	Review email from client re number of days it was 100 degrees	0.15
7.24.17	Email chain with client re Purvis model being sent to Koch	0.25
7.24.17	Email chain with client re Viking supplemented any emails re the Edgeworth case	0.20
7.24.17	Review summary email from client re his theory on Viking's temperature position	0.50
7.24.17	Review email from DSS to client re kreason depo	0.15
7.24.17	Review email from DSS re Kreason depo	0.15
7.24.17	Review email from DSS re re-noticing Carnahan depo and response	0.15
7.24.17	Email chain with DSS re contacting Harold Rodgers	0.15
7.24.17	Review email from DSS to Pancoast re Rog Response No. 4	0.15
7.24.17	Review email from DSS re drafting Rimkus subpoena for other sprinklers and response	0.15
7.25.17	Email chain with DSS re vacating status check on Lange sanctions	0.25
7.25.17	Email to Sia re signature page for 7.12.17 DCRR	0.15
7.25.17	Email to Pancoast re missing documents from Viking's 6 th ECC Supplement	0.25
7.25.17	Review email and attachments from client re important documents of the VK457 that we need to understand	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

7.25.17	Review email from client and deposition cite from Martorano deposition re number of activations	0.15
7.25.17	Review email from client and inquiries into the case re Viking's disclosure of number of activations	0.15
7.25.17	Review email from client re UL 1626 requesting us to locate document in Viking's disclosure	0.50
7.25.17	Review email from client re summary of issues about Viking client would like us to explore	0.50
7.25.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc,'s Second Supplemental Answers to Plaintiffs' Interrogatories	0.30
7.25.17	Call with DSS	0.15
7.25.17	Review, Download & Save Subpoena Duces Tecum for the NRCP 30(b)(6) Designee of the Viking Corporation	0.30
7.25.17	Review, Download & Save Third Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(b)(6) of Designees of the Viking Corp	0.30
7.25.17	Review, Download & Save SDT – for Robert Carnahan, P.E.	0.30
7.25.17	Review, Download & Save Third Amended Notice of Video Deposition of Robert Carnahan,P.E. Duces Tecum	0.30
7.25.17	Review, Download & Save SDT – for the Custodian of Records for Rimkus Consulting Group, Inc.	0.30
7.25.17	Review, Download & Save Notice of Deposition Duces Tecum of The Custodian of Records Rimkus Consulting Group, Inc	0.30
7.25.17	Review, Download & Save Subpoena Duces Tecum for The NRCP 30(b)(6) PMK for Zurich Insurance Company	0.30
7.25.17	Review, Download & Save Notice of Deposition of the NRCP 30 (b)(6) PMK Zurich Insurance Company	0.30
7.26.17	Review, Download & Save DCRR	0.30
7.26.17	Review, Download & Save DCRR	0.30
7.26.17	Review, Download & Save DCCR	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

7.26.17	Review, Download & Save Plaintiffs 2 nd Set of Interrogatories to Defendants The Viking Corp	0.30
7.26.17	Review, Download & Save Plaintiffs 2 nd Set of Requests for Production to Defendants The Viking Corporation	0.30
7.26.17	Review, Download & Save DCRR	0.30
7.26.17	Review email from DSS to Pancoast re Nationwide case	0.15
7.26.17	Review email and attachment from client re drawings and what client's staff can re-draw	0.25
7.26.17	Review email and attachment from client re mechanical engineering points client wants to talk to experts about and analysis	0.50
7.26.17	Review email from client re King County case	0.15
7.26.17	Review email from client re inquires why Viking was not disclosing premature activations	0.15
7.27.17	Review, Download & Save The Viking Corporation and Supply Network, Inc.'s Motion for Protective Order and Request for OST	0.30
7.27.17	Review, Download & Save Defendant Lange Plumbing, LLC 's Joinder to Plaintiffs' Objection to Confidentiality Designation Pursuant to the Protective order	0.30
7.27.17	Review, Download & Save SDT COR Rimkus Consulting Group, Inc.	0.30
7.27.17	Review, Download & Save Plaintiffs 1 st Set of Requests for Production to Defendants The Viking Corporation	0.30
7.28.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's Initial Early Case Conference Disclosure of Documents and Witnesses	0.30
7.28.17	Review email from client re important photo evidence and review document cited in email	0.25
7.31.17	Review email and deposition testimony cite from client re Viking not aware of documentation	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.1.17	Review email from DSS to Janelle re service of Zurich directly	0.15
8.1.17	Review, Download & Save Letter from J. Pancoast to D. Simon re. Amended Subpoena	0.30
8.1.17	Review, Download & Save The Viking Corp Verification Page to Second Supplemental Answer to Plaintiffs' Interrogatories	0.30
8.1.17	Review, Download & Save Letter for J. Pancoast to D. Simon	0.30
8.2.17	Review, Download & Save SDT for Zurich	0.30
8.2.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc. 17 th Supplemental Disclosure	0.30
8.2.17	Review email from DSS to Pancoast re service of documents from recent production	0.15
8.3.17	Review email and attachment from client re an email that Viking "expects their findings to be shared"	0.25
8.3.17	Review email and attachment from client re UK threat by Viking	0.25
8.4.17	Email Chain with attachments with Sia re sanctions check	0.20
8.4.17	Review email and attachment from client re non-conforming hold	0.25
8.4.17	Review email and pictures from client re cut open VK457	0.25
8.4.17	Review, Download & Save SDT Angela Edgeworth	0.30
8.4.17	Review, Download & Save SDT Margaret Ho	0.30
8.4.17	Review, Download & Save SDT Colin Kendrick	0.30
8.7.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Motion for Protective Order No. 2 and Request for OST	0.30
8.7.17	Review, Download & Save SDT Mark Giberti	0.30
8.7.17	Review, Download & Save SDT PMK of Edgeworth Family Trust	0.30
8.7.17	Review, Download & Save SDT PMK of American Grating	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.7.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Request for Production to Giberti Construction, LLC	0.30
8.7.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Interrogatories to Giberti Construction, Inc.	0.30
8.7.17	Review, Download & Save Notice of Taking the Deposition of Mark Giberti	0.30
8.7.17	Review, Download & Save SDT for Mark Giberti	0.30
8.7.17	Review, Download & Save Notice of Taking the Deposition of NRCP 30(b)(6) Person Most Knowledgeable for American Grating, LLC	0.30
8.7.17	Review, Download & Save Notice of Taking the Deposition of NRCP 30(b)(6) Person Most Knowledgeable for Edgeworth Family Trust	0.30
8.7.17	Review, Download & Save Notice of Taking the Deposition of Angela Edgeworth	0.30
8.7.17	Review, Download & Save Notice of Taking Deposition for Kendrick Colin	0.30
8.7.17	Review, Download & Save SDT for Kendrick Colin	0.30
8.7.17	Review, Download & Save Notice of Deposition of Margaret Ho	0.30
8.7.17	Review, Download & Save SDT for Margaret Ho	0.30
8.7.17	Review email and attachment from client re defective head activations and comparison to Martorano testimony of 46	0.75
8.7.17	Review email and attachments from client re documents client would like to talk to expert about, including denial letters, material hold, exponent letter	0.75
8.7.17	Review email from client re his theory that people were being promoted despite cover-up	0.15
8.7.17	Email chain with DSS re Colin Kendrick and Margaret Ho	0.15
8.7.17	Review email from DSS re missed call from Fred Knez	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.7.17	Review email from DSS re drafting motion to amend to add Viking Corp and response	0.15
8.8.17	Email to Jessica Rogers re mandarin interpreter for Margaret Ho	0.15
8.8.17	Email chain with Ure re order to extend discovery	0.25
8.8.17	Email to Zamiski with additional documents for his review	0.15
8.8.17	Email to Zamiski requesting CV for expert disclosure	0.15
8.8.17	Review email and attachment from client re the cut open VK457 pic	0.25
8.8.17	Review email from client re labeling pictures	0.15
8.8.17	Review email and attachment from client re VK457 pic	0.25
8.8.17	Review email and attachments from client re Viking's pictures in reports and in powerpoints and analysis	0.50
8.8.17	Email chain with DSS re Viing's position of Martorano depo confidential	0.15
8.8.17	Email chain with DSS re documents still needed from Zamiski for expert disclosure	0.15
8.8.17	Review email from DSS re requesting hearing transcripts from Court and response	0.15
8.8.17	Call with DSS	0.10
8.8.17	Call with DSS	0.25
8.8.17	Call with DSS	0.25
8.9.17	Call with DSS	0.25
8.9.17	Call with DSS	0.10
8.9.17	Call with DSS	0.10
8.9.17	Review email from DSS re draft of motion to compel discovery from Viking and response	0.25
8.9.17	Email chain with DSS re draft notices for Viking employees in Michigan and notice of site inspection	0.40
8.9.17	Email chain with DSS re expert disclosure and addition of non-retained experts	0.30
8.9.17	Email chain with DSS re documents to send to Hastings from recent Viking productions	0.15
8.9.17	Review email chain with expert re what testing has to be done by UL	0.15

INVOICE FOR ASHLEY M. FERREL
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8.9.17	Review email and attachment from DSS and request to supplement fireplace pic and response	0.15
8.9.17	Email to Olivas requesting CV and hourly rate for expert disclosure	0.15
8.9.17	Email to Hastings with additional documents for his review	0.15
8.9.17	Review and respond to email from Beth Bernal with Vollmer Grey wit Zamiski CV and testimony list	0.15
8.9.17	Email chain with client re all of the Viking productions and my summary response after review of all 7 supplements	2.5
8.9.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s 8 th Supplemental Disclosures Pursuant to NRCP 16.1	0.30
8.10.17	Review and respond to email from Julie Lord (Dept.10 clerk) re spelling an final version of the hearing transcripts	0.30
8.10.17	Email to Hastings with additional documents for his review	0.15
8.10.17	Email chain with client re UL documents in Viking's 8 th ECC Supplement	0.25
8.10.17	Email chain with client re clarification in Scott's deposition	0.15
8.10.17	Review email from client re load on link and which of our experts can test	0.15
8.10.17	Review email from client re constraints on what he can and cannot say	0.15
8.10.17	Review email from client re Viking v. FSS and Thorpe case and review document referenced in email	0.25
8.10.17	Review email from client re former CEO Kevin Ortyl and review documents referenced in email	0.25
8.10.17	Email chain with client re a Viking email without an attachment and review of all documents referenced by client	0.75
8.10.17	Review email from client re requesting me to upload documents and response	0.25
8.10.17	Review and respond to Shari Adair re Don Koch invoice	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.10.17	Review email from client re written discovery questions he wants to send to Viking	0.25
8.10.17	Email chain with DSS re Plaintiff's ECC Supp	0.15
8.10.17	Email chain with DSS re sending documents to Hastings	0.15
8.10.17	Review email chain with client re dates and times for Margaret Ho's deposition	0.15
8.10.17	Email chain with DSS re UL documents being sent to experts	0.15
8.10.17	Review email from DSS re printing specific document and response	0.15
8.10.17	Review email from DSS to client re load on link opinion	0.15
8.10.17	Email chain with DSS re Rimkus objection and drafting motion to compel	0.25
8.11.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s 9 th Supplemental Disclosures Pursuant to NRCP 16.1	0.30
8.11.17	Review email from DSS re prepare motion to amend to add Viking group and response	0.15
8.11.17	Review email from DSS re drafting written discovery based off of questions drafted by client and response	0.50
8.11.17	Review email from DSS re documents to be printed from Hastings and response	0.15
8.11.17	Review email from DSS re drafting written discovery based off of questions drafted by client and response	0.50
8.11.17	Review email and 13page attachment from client regarding Scott Martorano depo testimony and analysis of client's summary	2.75
8.11.17	Review email from client re client's questions for Viking and analyze	0.75
8.11.17	Review email from client re his summary of information he wanted to share with experts, review documents referenced in client's summary and analyze	1.25
8.11.17	Email chain from client re Margaret Ho availability	0.25
8.12.17	Review email and attachment from client re written discovery client would like sent to Viking and analysis of questions	0.50

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.12.17	Call with DSS	0.15
8.13.17	Review email from client re written discovery client would like sent to Viking and analysis of questions and discussion with DSS	1.25
8.14.17	Email to client with all Viking expert reports	0.15
8.14.17	Review, Download & Save Plaintiffs Edgeworth Family Trust and American Grating, LLC's Initial Designation of Expert Witnesses and Reports (E-file, no reports attached)	0.30
8.14.17	Review, Download & Save Plaintiffs' Edgeworth Family Trust and American Grating, LLC's Initial Designation of Expert Witnesses and Reports (E-served, reports attached)	0.30
8.14.17	Review, Download & Save Plaintiffs' 2 nd Set of Requests for Admission to Defendants the Viking Corp	0.30
8.14.17	Review, Download & Save Plaintiffs' 3 rd Set of Requests for Production to Defendants	0.30
8.14.17	Review, Download & Save Plaintiffs' 3 rd Set of Interrogatories to Defendants the Viking Corp	0.30
8.14.17	Review, Download & Save Defendants The Viking Corp and Supply Network Inc 10 th Supplemental Disclosures Pursuant to NRCP 16 a 1	0.30
8.14.17	Review, Download & Save Plaintiffs' Motion to Amend the Complaint to Add Viking Group, Inc.	0.30
8.14.17	Review, Download & Save Lange's 9 th Supplemental Disclosures	0.30
8.14.17	Review, Download & Save Lange's Designation of Expert Witnesses	0.30
8.14.17	Review, Download & Save Defendant Giberti Construction, LLC's Initial Expert Disclosures	0.30
8.14.17	Review, Download & Save Subpoena Duces Tecum of the Custodian of Records for Rimkus Consulting Group, Inc.	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.14.17	Review, Download & Save Re – Notice of Deposition Duces Tecum of the Custodian of Records for Rimkus Consulting Group, Inc.	0.30
8.14.17	Review, Download & Save The Viking Corp and Supply Network, Inc.'s Designation of Expert Witnesses	0.30
8.14.17	Review, Download & Save Transcript of Proceedings All Pending Motions Tuesday, March 7, 2017	0.30
8.14.17	Review, Download & Save Transcript of Proceedings All Pending Motions Tuesday April 25, 2017	0.30
8.14.17	Email to client re Defendant's Expert Reports uploaded to dropbox	0.15
8.14.17	Review email and link from client re guy in Florida who experienced flood	0.25
8.14.17	Email chain re load on link tests and corresponding documents produced in our case	1.25
8.14.17	Review email from client re dropbox; creation of central Edgeworth dropbox and uploading all documents into dropbox	0.50
8.14.17	Review email from client re difference if changed to greater or equal	0.15
8.14.17	Review email and attachments from client re National hourly weather data from Henderson	1.0
8.14.17	Email chain with DSS re Jennifer Brock with Zurich re SDT	0.25
8.14.17	Review email from DSS to Pancoast re expert reports not attached to disclosure	0.15
8.14.17	Review email and attachment from DSS re txt searchable version of UL	0.25
8.15.17	Email to Hastings with additional documents for his review	0.15
8.15.17	Email chain with client re missing documents; review of file for documents and response	0.75
8.15.17	Review email from client re Hasting's attic temperatures	0.15
8.15.17	Review email from client re 561 Fox Hill	0.15
8.15.17	Review email and attachments from client re Henderson weather	0.75

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.15.17	Review, Download & Save Subpoena Duces Tecum for Devin O'Dell	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Devin O'Dell Duces Tecum	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for Scott Franson	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Scott Franson Duces Tecum	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for James Golinveaux	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for Jeff Norton	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of James Golinveaux Duces Tecum	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Jeff Norton Duces Tecum	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for Tom O'Connow	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for Sherri Simmons	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Tom O Connor Duces Tecum	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Sherri Simmons Duces Tecum	0.30
8.15.17	Review, Download & Save Subpoena Duces Tecum for Mike Bosma	0.30
8.15.17	Review, Download & Save Notice of Video Deposition of Mike Bosma Duces Tecum	0.30
8.15.17	Review, Download & Save Plaintiffs' Opposition to Defendant the Viking Corp and Supply Network, Inc.'s Motions for Protective Orders and Requests for OST	0.30
8.15.17	Review, Download & Save Viking's Letter re Violation of Protective Order	0.30
8.16.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 12 th Supplemental Disclosures	0.30
8.16.17	Review, Download & Save Plaintiffs' Notice of Entry Upon Land/Site Inspection	0.30
8.16.17	Review, Download & Save— Subpoena Duces Tecum for Kevin Ortyl	0.30
8.16.17	Review, Download & Save Notice of Video Deposition of Kevin Ortyl Duces Tecum	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.16.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC's 8 th Supplement to Early Case Conference Witness and Exhibit List	0.30
8.16.17	Review, Download & Save Proof of Service	0.30
8.16.17	Review, Download & Save Defendant The Viking Corporation and Supply Network, Inc.'s 11 th Supplemental Disclosures Pursuant to NRCP 16(a)(1)	0.30
8.16.17	Email to Zamiski with additional documents for his review	0.15
8.16.17	Review email from client re number of activations and client's analysis	0.75
8.16.17	Email to client re all disclosures (ECC and expert) uploaded into dropbox	0.15
8.16.17	Email to client with Viking's 12 th ECC Supp	0.15
8.16.17	Email chain with client regarding missing documents; review of file for documents and response	1.50
8.16.17	Email chain with DSS and client re number of hours heat exceeded 100 degrees	0.15
8.16.17	Review email from DSS re Don Koch availability and response	0.15
8.16.17	Email chain with DSS re expert reports	0.25
8.16.17	Review email and attachments from DSS re Lange expert reports	0.25
8.16.17	Review email from DSS to Pancoast re depositions set for 9/8/17	0.15
8.16.17	Email chain with DSS re Viking's 12 th ECC Supplement and uploading docs to Dropbox	0.15
8.16.17	Review email from DSS to Fred Knez e deposition dates for Harold Rodgers	0.15
8.16.17	Email chain re deposition scheduling of Michigan Viking employees	0.25
8.16.17	Email to DSS re summary of Viking document dumps	1.75
8.17.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Reply Re: Motions for Protective Order [Nos. 1&2]	0.30
8.17.17	Review, Download & Save Plaintiffs' Motion to Compel Viking Documents and for Sanctions on OST	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.17.17	Email chain with DSS re sending Mark Giberti City of Henderson documents	0.15
8.17.17	Review email from DSS to Pancoast re document dumps	0.25
8.17.17	Email chain with DSS re motion to compel	0.15
8.17.17	Email chain with DSS re reports being sent to Zamiski	0.15
8.17.17	Email chain with Ure re receipt of Plaintiff's Motion to Compel Viking on OST	0.25
8.17.17	Email to Hastings with additional documents for his review	0.15
8.17.17	Email to Olivas with additional documents for his review	0.15
8.17.17	Email to Zamiski with additional documents for his review	0.15
8.17.17	Review email from client and response re location of the VIK documents in dropbox	0.25
8.17.17	Email chain with client re location and review of documents in Viking's 6 th Supplement; review of Viking entire 6 th supplement for client's requested docs	2.75
8.17.17	Email chain with client re city of Henderson documents	0.25
8.17.17	Review email from client re MSJ against Lange	0.15
8.18.17	Email to Hastings re request for him to Fed-Ex binder back	0.15
8.18.17	Review email from client re "just one family or house etc."	0.15
8.18.17	Email chain with client re Viking motion for protective order	0.20
8.18.17	Email chain with client re claim from Portland Winnelson	0.20
8.18.17	Review email from client re Viking's Motion and assertion re loan payment and client's opinion	0.25
8.18.17	Review email from DSS to Pancoast re Martorano verifications	0.15
8.18.17	Review, Download & Save Plaintiffs' Motion to Compel Rimkus Consulting to Respond to the Notice of Deposition and Subpoena Duces Tecum	0.30
8.18.17	Review, Download & Save Notice of Association of Counsel	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.18.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s Opposition to Plaintiffs' Motion to Compel	0.30
8.18.17	Review, Download & Save ROC – Motion to Compel Viking Documents on OST	0.30
8.19.17	Review email from client re exponent report rationale	0.25
8.19.17	Review email and attachment of Viking powerpoint of residential sprinklers installation heat source from client re exponent report from 2015 and the	0.50
8.20.17	Email chain with Brian Garelli re documents to review for expert report	0.25
8.20.17	Call with DSS	0.10
8.20.17	Review email and attachments from client re Scott reference to database for number of activations	0.25
8.20.17	Review email from client re FSS discovery docs produced in Viking supplement	0.15
8.20.17	Email chain with client re Viking document dump	0.25
8.20.17	Review email from client re example that VK457 is extraordinary	0.25
8.20.17	Review email and attachment from client re Motion to compel	0.50
8.20.17	Review email from DSS re printing email of missing Viking documents and response	0.25
8.21.17	Review, Download & Save Reply to Viking's Opposition to Plaintiffs' Motion to Compel Viking Documents and for Order to Respond to Discovery and for Sanctions on OST	0.30
8.21.17	Email chain with DSS re Motion to Compel Rimkus	0.15
8.21.17	Review email and attachment from DSS re preparing commission to take out of state depo of Harold Rodgers and response	0.25
8.21.17	Email chain with DSS re new requests for production	0.15
8.21.17	Email chain with DSS re notice and SDT to 30(b)(6) or Reliable and 30(b)(6) of Tyco	0.25
8.21.17	Review email from Tashia Garry re Viking's 11 th ECC Supp	0.15
8.21.17	Email to Sia, Pancoast, Nunez re revised 7.12.17 DCRR	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.21.17	Review email from client re Reliable and Tyco depositions	0.15
8.21.17	Email chain with client re motion to compel and Viking motion for protective order	0.50
8.21.17	Review email from client re "rules of thumb" re screw/bolt and attachments	0.75
8.21.17	Email to Mr. Poland re Plaintiff's Motion to compel Rimkus	0.15
8.21.17	Email to client re Reply to Motion to Compel Viking	0.15
8.21.17	Review email from client re adding Angela to dropbox	0.25
8.22.17	Review email and attachment from client re Viking residential sprinkler installation publication	0.75
8.22.17	Review, Download & Save Plaintiffs' 4 th Set of Requests for Production to Defendants the Viking Corp	0.30
8.22.17	Review email from DSS re Viking emails	0.15
8.23.17	Email chain with client re nest information	0.25
8.23.17	Email chain with DSS re interior temps of Edgeworth house and what experts to send to	0.15
8.24.17	Review, Download & Save Plaintiffs' 3 rd Set of Requests for Admission to Defendants the Viking Corp	0.30
8.24.17	Email chain with Zamiski re sending more sprinklers to Vollmer Gray and the Fed-Ex tracking number	0.25
8.24.17	Review and respond to email from Susan Carbone re Sia signature page for DCRR	0.15
8.24.17	Review email from client re request for photos of bent lever bars and over screwed load screws; review of file and response with requested documents	1.25
8.25.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's First Supplement to its Initial Early Case Conference Disclosure of Documents and Witnesses	0.30
8.25.17	Email to Crane Pomerantz re additional documents for review	0.25
8.25.17	Email chain with client re PDF of Margaret's promissory note and response	0.50

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.27.17	Review email from DSS re printing several copies of bent lever bars	0.15
8.28.17	Review, Download & Save Defendant The Viking Corporation's Responses to Plaintiffs Second Interrogatories	0.30
8.28.17	Email to client with summary and attachments for Thorpe and FSS case dockets	1.5
8.28.17	Email to Pancoast re DCRR template	0.15
8.28.17	Email to Crane Pomerantz with additional documents for his review	0.15
8.29.17	Email chain with Pancoast re calendar and hearings	0.25
8.29.17	Email chain with Ure re pick up of signature page for the 7.12.17 DCRR	0.15
8.29.17	Email to Don Koch with additional documents for his review	0.15
8.29.17	Review email from client re Thorpe and UL	0.25
8.29.17	Review email from client requesting Viking answers and response email with answers to client	0.50
8.29.17	Review email from client re Colin Kendrick's contact information	0.15
8.29.17	Call with DSS	0.25
8.29.17	Review email from client re depositions of Colin, Angela and Brian	0.15
8.29.17	Review email from DSS re delivery of Koch binder and response	0.15
8.29.17	Review email from DSS to Pancoast re heat invitation	0.15
8.29.17	Review email from DSS to Pancoast re deficient 2 nd set of Rogs	0.15
8.29.17	Review email from DSS re Jay McConnell phone call	0.15
8.29.17	Review, Download & Save Order granting Giberti Construction, LLC's Motion to Extend Discovery Deadlines (1 st Request)	0.30
8.29.17	Review, Download & Save Defendant The Viking Corp Responses to Plaintiffs' Second Request for Production of Documents	0.30
8.29.17	Review, Download & Save Defendant The Viking Corp Responses to Plaintiffs' First Request for Production of Documents	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

8.29.17	Review, Download & Save Letter to D. Simon from J. Pancoast re. PMK Deposition Documents	0.30
8.30.17	Email chain with DSS re Viking's responses to Lange	0.50
8.30.17	Email to Hastings with additional documents for his review	0.15
8.30.17	Review email from client re questions client would like to ask Viking PMK Scott Martorano	0.50
8.30.17	Email chain with client re Thorpe and FSS case dockets	1.25
8.30.17	Review, Download & Save Notice of Entry of Order Granting Giberti Construction LLC's Motion Extend Discovery Deadlines	0.30
8.30.17	Review, Download & Save Defendant Supply Network, Inc.'s Objection to Subpoenas	0.30
8.30.17	Review, Download & Save Defendant The Viking Corporation's Supplemental Responses to Plaintiff's Second Set of Interrogatories	0.30
8.31.17	Review, Download & Save Defendants the Viking Corporation and Supply Network, Inc. dba Viking SupplyNet Opposition to Plaintiffs Motion to Amend Complaint to Add Viking Group, Inc.	0.30
9.1.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Harold Rodgers	0.30
9.1.17	Call with DSS	0.25
9.1.17	Call with DSS	0.25
9.1.17	Review, Download & Save Commission To Take Deposition Outside the State of Nevada of Harold Rodgers	0.30
9.1.17	Review, Download & Save Subpoena Duces Tecum for Harold Rodgers	0.30
9.1.17	Review, Download & Save Notice of Video Deposition of Harold Rodgers Duces Tecum	0.30
9.1.17	Review, Download & Save Motion to Associate Counsel (Kenton L. Robinson)	0.30
9.1.17	Review, Download & Save Motion to Associate Counsel (John McConnell)	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.1.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's Second Supplement to Its Initial Early Case Conference Disclosure of Documents and Witnesses	0.30
9.1.17	Email to Pancoast, Nunez, Sia, Robinson re mediation date	0.15
9.1.17	Review email from Bartlett re ZAIC deposition notice and subpoena	0.15
9.1.17	Email to Hastings with additional documents for his review	0.15
9.1.17	Email to Zamiski with additional documents for his review	0.15
9.1.17	Review email from client re VIKZ documents with addresses and request for list to cross reference; review of the VIKZ documents as relating to this email	1.75
9.2.17	Review email from client re missing documents and his creation of master index; review documents referenced in email	2.0
9.2.17	Email chain with client and DSS re UL definition of 1626	0.50
9.4.17	Review email from client re Carnahan report and questions client has for Zamisky and Hastings and review attachments	1.25
9.4.17	Review email from client re VKPC documents and respond	0.15
9.4.17	Review email and attachments from client re deception and lies to the public by Viking	2.75
9.4.17	Review email from client re RSS v. Viking case	0.15
9.2.17	Review email and attachments from DSS re UL's public definition of 1626 and response	0.50
9.5.17	Review email from DSS to Jen re amount of money owed to Carnahan for depo and response	0.15
9.5.17	Review email from DSS re re-serving depo notice for ZAIC and response	0.25
9.5.17	Email chain with DSS re re-scheduling depo of Harold Rodgers and PMK of EFT and AG	0.20
9.5.17	Email chain with DSS re discussing various issues re Edgeworth	0.50

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.5.17	Review, Download & Save Non – Party Rimkus Consulting Group, Inc. ‘s Opposition to Plaintiffs’ Motion to Compel Rimkus Consulting Group [Group, Inc.] to Respond to the Notice of Deposition and Subpoena Duces Tecum and Counter-Motion to Quash, and Motion to Protective Order	0.30
9.5.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC’s Ninth Supplement to Early Case Conference Witness and Exhibit List	0.30
9.5.17	Review, Download & Save Plaintiffs’ Limited Opposition to Viking’s Motions to Associate Counsel on an OST	0.30
9.5.17	Review, Download & Save SO – Subpoena Duces Tecum for the NRCP 30(b)(6) Person Most Knowledgeable for Zurich American Insurance Company	0.30
9.5.17	Review, Download & Save Amended Notice of Deposition of the NRCP 30(b)(6) Person Most Knowledgeable for Zurich American Insurance Company Duces Tecum	0.30
9.5.17	Email chain with Nunez, Pancoast, Sia re mediation	0.15
9.5.17	Email to Bartlett re Amended Notice of 30(b)(6) deposition of Zurich	0.15
9.5.17	Email to Hastings with additional documents for his review	0.15
9.5.17	Email to Zamiski with additional documents for his review	0.15
9.5.17	Email to Don Koch with additional documents for his review and review of his response	0.25
9.5.17	Email to Crane Pomerantz with additional documents for his review	0.15
9.5.17	Review email from client re load on link QA records and attachments	1.0
9.5.17	Email chain with client re Viking design documents and response to client	0.25
9.5.17	Review email from client re Vk457 production numbers from from 11/2013 to 11/2014	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.5.17	Review email from client re documents that the client would like emailed to him; review of file for documents and response	1.25
9.5.17	Review email from client re spring compression fraud	0.25
9.5.17	Call with DSS	0.15
9.6.17	Call with DSS	0.25
9.6.17	Call with Pancoast	0.25
9.6.17	Call with DSS	0.15
9.6.17	Review email from DSS re adding additional topic to UL 30(b)(6) notice and response	0.15
9.6.17	Review email from DSS to Bartlett re ZAIC subpoena and ZAIC position	0.40
9.6.17	Review email and download deposition from Oasis Reporting (Martorano Vol.2)	0.25
9.6.17	Review email from client re exhibits contained in Viking production and attachments and analyze	1.5
9.6.17	Review email from client re 12lb load on link info and testing	0.25
9.6.17	Email chain with Pancoast, Sia, Ure re 8.23.17 DCRR and proposed changes	0.50
9.6.17	Review email from client re weather expert's deception in his report and attachments	1.25
9.7.17	Review email and download link from Jessica Rogers with Carnahan job file	0.25
9.7.17	Review email from Sia re carrier at mediation	0.15
9.7.17	Call with DSS	0.15
9.7.17	Email to client link to Carnahan job file	0.15
9.7.17	Email to Janet re not able to agree to home inspection after discussion with DSS	0.25
9.7.17	Review email from client re UL follow up program and review of documents referenced in email	1.20
9.7.17	Review email from client re review of Pancoast disclosure and attachment	0.25
9.7.17	Review email from client re Exponent billing	0.15
9.7.17	Review email from client re emails contained in Rob Carnahan file and review of documents referenced in email	0.75

INVOICE FOR ASHLEY M. FERREL
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9.7.17	Email chain to DSS re Carnahan job file produced by Viking morning of deposition	0.25
9.7.17	Review email and attachment from DSS document to include in Motion to Strike and response	0.25
9.7.17	Email chain with DSS re mediation agreement	0.15
9.8.17	Review email from DSS to Sia re Kinsale carrier present at mediation	0.15
9.8.17	Review email from DSS re UL expert and request to finalize UL depo notice	0.15
9.8.17	Email chain with DSS re 8/23/17 DCRR and Viking's proposed changes	0.25
9.8.17	Review email from DSS re motions that need to be drafted	0.75
9.8.17	Review email from DSS re new topics for UL depo notice and response	0.50
9.8.17	Email chain with DSS re inspection of Mark Giberti job file by his lawyer	0.15
9.8.17	Email chain with DSS re Motion to Strike Carnahan and Motion to Strike Rosenthal	0.50
9.8.17	Email chain with DSS re ZAIC subpoena and response to ZAIC attorney	0.75
9.8.17	Email chain with DSS re topics in UL depo notice that may violate protective order	1.5
9.8.17	Review, Download & Save Subpoena Duces Tecum for Person Most Knowledgeable for Edgeworth Family Trust	0.30
9.8.17	Review, Download & Save Amended Notice of Taking Deposition of NRCP 30(b)(6) Person Most Knowledgeable Family Trust	0.30
9.8.17	Review, Download & Save Subpoena Duces Tecum for Person Most Knowledgeable for American Grating, LLC	0.30
9.8.17	Review, Download & Save Amended Notice of Taking the Deposition of NRCP 30(b)(6) Person Most Knowledgeable for American Grating, LLC	0.30
9.8.17	Review, Download & Save Subpoena Duces Tecum for the NRCP 30(b)(6) Person Most Knowledgeable for Zurich American Insurance Company	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.8.17	Review, Download & Save Amended Notice of Deposition of the NRCP 30(b)(6) Person Most Knowledgeable for Zurich American Insurance Company Duces	0.30
9.8.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
9.8.17	Review, Download & Save Amended Notice of Deposition for Kendrick Colin	0.30
9.8.17	Review, Download & Save Subpoena Duces Tecum for Colin Kendrick	0.30
9.8.17	Review, Download & Save Amended Notice of Deposition for Margaret Ho	0.30
9.8.17	Review, Download & Save Subpoena Duces Tecum for Margaret Ho	0.30
9.8.17	Email to Bartlett re Amended Notice of Zurich 30(b)(6) Notice	0.15
9.8.17	Review email and attachments from client re the weight the link tears and analyze and discussion with DSS	1.5
9.8.17	Email chain with client re PMK Depo	0.15
9.8.17	Review email from client re impossible to calculate force to sheer link and analyze	0.50
9.8.17	Email chain with client and DSS re Viking's UL expert and review attachments	0.50
9.8.17	Review email from client re points he would like Hastings and Zamiski to address in their reports	0.25
9.8.17	Review email from client re photo fraud and analysis of photo fraud document drafted by client	2.5
9.9.17	Review email from client re requests from Viking before mediation and review of documents referenced in email	1.5
9.9.17	Review email from client re admissions client would like from Viking and draft written discovery	1.5
9.9.17	Email chain with client re history of VC, VIK and VIKZ	0.25
9.9.17	Review email from DSS re additional topics for UL notice and response	0.25
9.10.17	Email chain with client re all deposition dates scheduled and pending and response email after review of calendar and notices	1.25

INVOICE FOR ASHLEY M. FERREL
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9.10.17	Review email from client re objection chart client created during Carnahan depo	0.50
9.10.17	Review email and attachment from client re conversation with expert Zamisky re testing and overtightening of screw and analyze	0.50
9.11.17	Email to Jessica Rogers re Olivas expert report with color photos	0.15
9.11.17	Email to Debbie Holloman at JAMS re mediation agreement	0.15
9.11.17	Email chain with Bartlett re amended deposition notice	0.25
9.11.17	Email to Zamiski with additional documents for his review	0.15
9.11.17	Email to Hastings with additional documents for his review	0.15
9.11.17	Review email from client re mediation scheduling	0.15
9.11.17	Review email from DSS to Pancoast re information Martorano promised in depo	0.15
9.11.17	Email chain with DSS re 8/23/17 DCRR	0.25
9.11.17	Email chain with DSS re Edgeworth case schedule	1.0
9.11.17	Review, Download & Save Defendant Giberti Construction LLC 's Responses to The Viking Corporation's First Set of Interrogatories	0.30
9.11.17	Review, Download & Save Third Party Defendant Giberti Construction LLC's Responses to Viking Corp's First Set of Request for Production	0.30
9.11.17	Review, Download & Save Defendants the Viking Corp and Siupply Network, Inc.'s Motion to Compel Home Inspection and or in the Alternative Motion to Strike Portions of Expert Testimony and OST	0.30
9.12.17	Review, Download & Save Non Party Rimkus Consulting Group, Inc.'s Supplement to Its Opposition to Plaintiffs Motion to Compel Rimkus Consulting [Group, Inc.] to Respond to the Notice of Deposition and Subpoena Duces Tecum; and Counter- Motion to Quash, and Motion for Protective Order	0.30
9.12.17	Call with Client	0.15
9.12.17	Call with Client	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.12.17	Call with DSS	0.15
9.12.17	Review, Download & Save Plaintiffs' Opposition to Defendants the Viking Corporation and Supply Network, Inc.'s Motion to Compel Home Inspection and Or in the Alternative Motion to Strike Portions of Expert Testimony on OST	0.30
9.12.17	Review, Download & Save RPLY- to Defendants the Viking Corp and Supply Network, Inc. dba Viking Supply Net's Opposition to Plaintiff's Motion to Amend the Complaint to Add Viking Group, Inc.	0.30
9.12.17	Review, Download & Save Plaintiffs' Reply to Defendants the Viking Corp and Supply Network, Inc. dba Viking SupplyNet's Opposition to Plaintiffs Motion to Amend the Complaint to Add Viking Group, Inc.	0.30
9.12.17	Review, Download & Save Amended Notice of Taking Deposition of Angela Edgeworth	0.30
9.12.17	Email chain with Zamiski re exhibits for Carnahan depo	0.15
9.12.17	Review email from client re Suggs Report and his discussions with Giberti	0.15
9.12.17	Email chain with client re Viking's motion to strike expert and motion to compel home inspection	0.25
9.12.17	Review email from DSS re Opp to motion to compel inspection	0.15
9.12.17	Review email from DSS re revised reply to motion to amend and response	0.15
9.12.17	Email chain with DSS re motion to compel re heat powerpoint documents	0.15
9.12.17	Review email from DSS to client re rebuttal to Suggs report	0.15
9.13.17	Email chain with DSS re documents being sent to Zamiski	0.15
9.13.17	Review email and attachment from DSS re documents to include in next ECC Supp and response	0.15
9.13.17	Review email from DSS re documents he needs for hearing and response	0.15
9.13.17	Review email from DSS re Michigan Viking employees amended depositions	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.13.17	Review, Download & Save COMM to take out of State Deposition Harold Rodgers	0.30
9.13.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Harold Rodgers	0.30
9.13.17	Review, Download & Save COMM to Take out of State Deposition UL Laboratories	0.30
9.13.17	Review, Download & Save APCOM-Application for Issuance of Commission to Take Out of State Deposition UL Laboratories	0.30
9.13.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition Tyco	0.30
9.13.17	Review, Download & Save COMM to Take Out of State Deposition Tyco	0.30
9.13.17	Review, Download & Save Application of issuance of Commission to Take Out of State Deposition of Reliable	0.30
9.13.17	Review, Download & Save to Take Out of State Deposition of Reliable	0.30
9.13.17	Review, Download & Save COMM to Take Out of State Deposition Viking Group	0.30
9.13.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Viking Group	0.30
9.13.17	Review, Download & Save Amended Order Setting Civil Jury Trial	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Scott Franson	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition of Scott Franson Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Jeff Norton	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition of Jeff Norton Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for James Golinveaux	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Sherri Simmons	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.13.17	Review, Download & Save Amended Notice of Video Deposition of James Golinveaux Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Tom O'Connor	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition to Tom O'Connor	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Mike Bosma	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Devine ODell	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition of Mike Bosma Duces Tecum	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition of Devin ODell	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Kevin Ortyl	0.30
9.13.17	Review, Download & Save Amended Notice of video Deposition of Kevin Ortyl Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Doug Bensinger	0.30
9.13.17	Review, Download & Save Notice of Video Deposition of Doug Bensinger Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for Harold Rogers	0.30
9.13.17	Review, Download & Save Amended Notice of Video Deposition of Harold Rogers Duces Tecum	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for 30(b)(6) of the Designees of Underwriters Laboratories	0.30
9.13.17	Review, Download & Save Plaintiffs' Amended Notice of Entry Upon Land / Site Inspection	0.30
9.13.17	Review, Download & Save Plaintiffs' 5 th Set of Requests for Production to Defendants the Viking Corporation	0.30
9.13.17	Review, Download & Save Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(b)(6) of Designees of Underwriters Laboratories, Inc.	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.13.17	Review, Download & Save Plaintiffs' 4 th Set of Interrogatories to Defendants the Viking Corporation	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for NRCP 30(b)(6) of Designees of Viking Group, Inc.	0.30
9.13.17	Review, Download & Save Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(b)(6) of Designees of Viking Group, Inc.	0.30
9.13.17	Review, Download & Save Plaintiffs' 4 th Set of Requests for Admission to Defendants the Viking Corp	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for NRCP 30(b)(6) of Designees of Tyco Fire Protection Products	0.30
9.13.17	Review, Download & Save Subpoena Duces Tecum for NRCP 30(b)(6) of Designees of Reliable Automatic Sprinkler Company, Inc	0.30
9.13.17	Review, Download & Save Notice of video Deposition Duces Tecum Pursuant to NRCP 30(b)(6) Of Designees of Tyco Fire Protection Products	0.30
9.13.17	Review, Download & Save Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(b)(6) of Designees of Reliable Automatic Sprinkler Company, Inc.	0.30
9.13.17	Review, Download & Save Order Admitting to Practice (Kenton L. Robinson)	0.30
9.13.17	Review, Download & Save Order Admitting to Practice (John W. McConnell III)	0.30
9.13.17	Review email from Sia re current fees and costs	0.15
9.13.17	Review email from Robinson re deposition dates for Zamiski, Hastings, Olivas	0.15
9.14.17	Email chain with Robinson re Simmons deposition notice	0.25
9.14.17	Email chain with Ure re Giberti inspection of documents at office	0.25
9.14.17	Email to Zamiski with additional documents for his review	0.15
9.14.17	Review email from Don Koch re documents and his position	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.14.17	Review email and attachment from client re Bert Howe report	1.0
9.14.17	Email chain with client re documents Zamiski needs	1.0
9.14.17	Review email and attachments re investor emails	0.25
9.14.17	Review email from client re Howe report	0.15
9.14.17	Call with Client	0.15
9.14.17	Call with Client	0.40
9.14.17	Email chain with client re discussion about hearing	0.15
9.14.17	Email to Crane Pomerantz with additional documents for his review	0.25
9.14.17	Review, Download & Save Non – Party Rimkus Consulting Group, Inc.’s Opposition to Plaintiffs’ Motion to Compel Rimkus Consulting [Group, Inc.] to Respond to the Notice of Deposition and Subpoena Duces Tecum and Opposition to Counter-Motion to Quash and Motion Protective Order	0.30
9.14.17	Review, Download & Save Defendant the Viking Corporation’s Responses to Plaintiffs Third Interrogatories	0.30
9.14.17	Review, Download & Save Defendant the Viking Corporation’s Responses to Plaintiffs’ Third Requests for Production of Documents	0.30
9.14.17	Review, Download & Save Defendant The Viking Corporation’s Responses to Plaintiffs’ Second Requests for Admissions	0.30
9.14.17	Review, Download & Save Amended Notice of Taking the Deposition of Angela Edgeworth	0.30
9.14.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC’s Third Supplement to its Initial Early Case Conference Disclosure of Documents and Witnesses	0.30
9.14.17	Email chain with DSS re Ure coming to inspect Giberti file	0.15
9.14.17	Review email and attachment from DSS re PMK depo pages from client for motion to strike	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

9.14.17	Review email from DSS re new dates to send to Robinson re expert depos	0.15
9.15.17	Review email and attachment from DSS re Viking BlazeMaster piping ratings attachment and request to send to Koch	0.25
9.15.17	Review email and attachment from DSS re allowable attic temps and request to send to Koch	0.25
9.15.17	Review email from DSS to Bartless re ZAIC subpoena	0.15
9.15.17	Email chain with DSS re exhibits for Angela's depo	0.15
9.15.17	Email chain with DSS re depo notice of Nate Wittasek	0.25
9.15.17	Email chain with DSS re sending Pancoast UL letter to all experts	0.20
9.15.17	Email chain with DSS re 2.34 for Viking re deficient written discovery responses	0.15
9.15.17	Email chain with DSS re Viking's "searchable index"	0.25
9.15.17	Email chain with DSS re subjects for Viking 30(b)(6) about minimax	0.30
9.15.17	Review, Download & Save Amended Notice of Telephonic 2.34 Conference with Viking Defendants	0.30
9.15.17	Review, Download & Save Notice of Telephonic 2.34 Conference with Viking Defendants	0.30
9.15.17	Review, Download & Save Amended Notice of Taking Deposition of Sherri Simmons Duces Tecum	0.30
9.15.17	Email to Hastings with additional documents for his review	0.15
9.15.17	Email chain with client re hourly temps and info sent to Koch	0.25
9.15.17	Review email and link from Don Koch for DSS	0.25
9.15.17	Email to Zamiski with additional documents for his review	0.15
9.15.17	Email to Don Koch with additional documents for his review	0.15
9.15.17	Review email and attachment from client re UL Testing descriptions	1.25
9.15.17	Email to Crane Pomerantz with additional documents for his review	0.15

INVOICE FOR ASHLEY M. FERREL
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9.16.17	Call with DSS	0.15
9.17.17	Email chain and attachments with client and DSS re what documents experts need	1.0
9.17.17	Email to Don Koch requesting CV for expert disclosure	0.15
9.17.17	Review email from client re David Suggs report and response	0.25
9.17.17	Review email and attachment from DSS re Brian Garelli CV	0.15
9.17.17	Email chain with DSS re adding depo testimony in Carnahan motion to compel	0.15
9.18.17	Email chain with DSS re documents being sent to Hastings	0.15
9.18.17	Review email from DSS re stuff to add to Carnahan motion to compel	0.20
9.18.17	Review email from DSS re changing Rosenthal motion to OST and response	0.15
9.18.17	Review email from DSS re providing expert depo dates for Olivas to Robinson and response	0.15
9.18.17	Email chain with DSS re Brian Garelli documents for expert disclosure	0.20
9.18.17	Review email from DSS re Colin Kendrick depo	0.15
9.18.17	Review email from DSS re documents sent by client and request to forward to Koch	0.15
9.18.17	Call with Client	0.15
9.18.17	Call with Client	0.15
9.18.17	Email chain with DSS re meet and confer with Pancoast on motion to compel	0.20
9.18.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC's Rebuttal Designation of Expert Witnesses and Reports (E-file- no reports attached)	0.30
9.18.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC's Rebuttal Designation of Expert Witnesses and Reports (Service only- reports attached)	0.30
9.18.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc's 13 th Supplemental Disclosures Pursuant to NRCP 16(a)(1)	0.30

INVOICE FOR ASHLEY M. FERREL
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9.18.17	Review, Download & Save The Viking Corporation and Supply Network, Inc's Supplemental Designation of Expert Witness	0.30
9.18.17	Review, Download & Save Lange Plumbing's 10 th Supplemental 16.1 Disclosures	0.30
9.18.17	Review, Download & Save Lange Plumbing's Designation of Rebuttal Expert Witnesses	0.30
9.18.17	Review, Download & Save Notice of Deposition of Gerald Zamiski	0.30
9.18.17	Review, Download & Save Notice of Deposition of Kevin Hastings	0.30
9.18.17	Review, Download & Save Notice of Taking Deposition – John Olivas	0.30
9.18.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's 4 th Supplement to its Initial Early Case Conference Disclosure of Documents and Witnesses	0.30
9.18.17	Review, Download & Save Third Party Defendant Giberti Construction, LLC's Designation of Rebuttal Expert Witnesses	0.30
9.18.17	Review email and download rough deposition from Oasis Reporting (Angela Edgeworth)	0.25
9.18.17	Review email from Colin Kendrick re deposition	0.15
9.18.17	Review email and respond to email from Bill LaBorde with Oasis re rough transcript	0.15
9.18.17	Email chain with Bartlett re meet and confer	0.25
9.18.17	Review email from client re American Grating hourly billing rate	0.15
9.18.17	Review email from client re disagreement with Zamiski report and calculations why it was more than 1 turn and analysis	0.20
9.18.17	Email to Hastings with additional documents for his review	0.15
9.18.17	Review email and attachment from client re NFPA13D	0.25
9.18.17	Email to client re pics Hastings is using in his report	0.15

INVOICE FOR ASHLEY M. FERREL
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9.18.17	Review email and attachment from client re torn link	0.25
9.18.17	Review and respond to email from Evelyn Chun re expert depo dates	0.15
9.18.17	Email to Don Koch with additional documents for his review	0.25
9.19.17	Review and respond to email from Jason Reese re receipt fo Don Koch report	0.15
9.19.17	Email to Pancoast re confirmation of DeLARosa depo	0.15
9.19.17	Review email from Robinson re calling him for all future 2.34 conferences	0.15
9.19.17	Email to Hastings re deposition notice	0.15
9.19.17	Email to Olivas re deposition notice	0.15
9.19.17	Email to Zamiski re deposition notice	0.15
9.19.17	Email chain with client re Rosenthal and heat article cited	0.75
9.19.17	Email to client re rebuttal reports uploaded to dropbox	0.15
9.19.17	Email to Sia re vacating depo of Mr. Cameron	0.15
9.19.17	Review email and attachment from client re the number of hours temp was over 100	0.50
9.20.17	Email to Hastings with additional documents for his review	0.15
9.20.17	Review email from client re questions for Mark Giberti depo	0.25
9.20.17	Review email from client re Howe Report and analysis of email, Howe report and discussion with DSS	2.5
9.20.17	Email chain with client re city of Henderson inspection report	0.15
9.20.17	Review, Download & Save Plaintiffs' Motion to Compel Testimony and Evidence of Defendants, the Viking Corporation and Supply Network, Inc. dba Viking Supplynet 's Expert, Robert Carnahan, or in the Alternative, Strike Robert Carnahan as an Expert on OST	0.30
9.20.17	Review, Download & Save Notice of Vacating Video Deposition of Custodian of Records for Rimkus Consulting Group, Inc.	0.30
9.20.17	Review, Download & Save Notice of Vacating Video Deposition of James Cameron	0.30

INVOICE FOR ASHLEY M. FERREL
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9/20/17	Attend Hearing re: Motion to Compel Rimkus Depo and	5.25
9/20/17	Draft and serve notice to vacate COR depo of Rimkus	0.5
9.20.17	Review email from DSS requesting Pomerantz report be sent to Hastings	0.15
9.20.17	Review email from DSS re lawyers in Riverside to represent us for Harold Rodgers depo	0.15
9.21.17	Email chain with DSS re drafting MSJ against Lange only	0.15
9.21.17	Email chain with DSS re email from Kreason about cabinets and fireplace	0.25
9.21.17	Call with DSS	0.25
9.21.17	Email chain with DSS re call with Hastings re Pomerantz report	0.15
9.21.17	Review, Download & Save Plaintiffs Motion in Limine to Exclude Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Expert Jay Rosenthal on OST	0.30
9.21.17	Review, Download & Save Plaintiffs' Motion for Summary Judgment Against Lange Plumbing, LLC . Only	0.30
9/21/17	Draft Motion to Strike	2.5
9/21/17	Draft order granting motion to amend complaint	1.25
9/21/17	Revise, pull exhibits and serve MSJ against Lange Plumbing	2.25
9.21.17	Email chain with client re dba of Giberti construction	0.15
9/22/17	Discuss case and strategy with DSS	1.0
9/22/17	Draft Motion to Strike	3.0
9/22/17	Review Viking's Third Supplemental Answers to Plaintiffs' 1 st set of Rogs	0.5
9/22/17	Review Viking's Responses to Plaintiffs' 3 rd Set of RFAs	0.25
9/22/17	Review Viking's Responses to Plaintiffs' 3 rd Set of RFPs	0.25
9/22/17	Draft and Serve Plaintiffs' 10 th ECC Supplement	1.0
9.22.17	Review email from Bill LaBorde re Giberti rough transcript	0.15
9.22.17	Review email from Bartlett re ZAIC subpoena	0.15

INVOICE FOR ASHLEY M. FERREL
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9.22.17	Review email and attachment from client re UL test for load on link and client's analysis	0.75
9.22.17	Email chain with DSS re additional points for motion to strike	0.50
9.22.17	Email chain with DSS and client re actual fireplace repair costs	0.15
9.22.17	Review, Download & Save Defendants The Viking Corp and Supply Network , Inc.'s 14 th Supplemental Disclosure Pursuant to NRCP 16.1	0.30
9.22.17	Review, Download & Save Defendant The Viking Corporation's Second Supplemental Responses to Plaintiffs' Second Set of Interrogatories	0.30
9.22.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC 10 th Supplement to Early Case Conference Witness and Exhibit List	0.30
9.22.17	Review, Download & Save Defendant The Viking Corporation's Response to Plaintiffs' Requests for Production of Documents, Set Four	0.30
9.22.17	Review, Download & Save Defendant The Viking Corporation's Responses to Plaintiffs' Requests for Admission, Set Three	0.30
9.22.17	Review, Download & Save Amended Notice of Taking the Deposition of Brian Edgeworth and NRCP 30(b)(6) Person Most Knowledgeable for Edgeworth Family Trust and American Grating, LLC	0.30
9.22.17	Review, Download & Save Notice of Vacating the Deposition of Person Most Knowledgeable for American Grating, LLC 10.5.17	0.30
9.22.17	Review, Download & Save Defendants The Viking Corporation's Second Supplemental Answers to Plaintiffs' First Set of Interrogatories	0.30
9.22.17	Review, Download & Save ROC of Plaintiffs' motion to exclude Rosenthal on OST	0.30

INVOICE FOR ASHLEY M. FERREL
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9.22.17	Review, Download & Save ROC of Plaintiff's motion for Summary Judgement on OST	0.30
9.22.17	Email chain with client re written discovery responses and request for documents	0.25
9.22.17	Review email from client re UL testing and load on link analysis	0.50
9.23.17	Review email from client re amended list of activations and review documents identified in email	1.0
9.23.17	Review email and attachments from client re load on link argument and analyze	1.5
9.24.17	Review email from client re activation list and review documents identified in email	1.25
9.25.17	Email chain from client re Glen Rigdon entering property and respond	0.50
9/25/17	Revise and pull exhibits Motion to Strike on OST	3.5
9/25/17	Review Viking's Second Supplemental Answers to Plaintiffs' 2 nd set of Rogs	0.5
9/25/17	Draft DCRR for 9/20/17 Hearing	1.25
9/25/17	Draft DCRR for 9/13/17 Hearing	1.25
9/26/17	Prepare and attend Raul DeLa Rosa Deposition	3.25
9.26.17	Call with Client	0.15
9.26.17	Call with DSS	0.10
9.26.17	Call with DSS	0.10
9/26/17	Review Giberti's Joinder to Motion to Compel Carnahan	0.25
9/26/17	Draft and serve Amended Notice to COR of Zurch	0.25
9/26/17	Review Viking's 14th ECC Supplement	2.0
9.26.17	Review email and download deposition from Oasis Reporting (Angela Edgeworth)	0.25
9.26.17	Email chain with Robinson re deposition scheduling of Viking employees for October 25 th and 26 th and review of calendar	0.25
9.26.17	Email to Pancoast requesting production of documents referenced in De La Rosa Depo	0.15
9.26.17	Email to Robinson re confirmation all known activations	0.15
9.26.17	Review email from Bartlett re extension to produce list of activations and deposition date	0.15

INVOICE FOR ASHLEY M. FERREL
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9.26.17	Review, Download & Save Subpoena Duces Tecum for the NRCP 30(b)(6) Person Most Knowledgeable for Zurich American Insurance Company	0.30
9.26.17	Review, Download & Save Amended Notice of Taking Deposition of the NRCP (B)(6) Person Most Knowledgeable for Zurich American Insurance Company Duces Tecum	0.30
9.26.17	Review, Download & Save Third Party Defendant Gilberti Construction LLC Joinder to Plaintiffs Motion to Compel Testimony and Evidence of Defendants, The Viking Corp and Supply Net Inc. dba Viking Supply Net Expert, Robert Carnahan, or in the Alternative, Strike Robert Carnahan as an Expert on OST	0.30
9.27.17	Review, Download & Save DCRR	0.30
9.27.17	Review, Download & Save DCRR	0.30
9.27.17	Review, Download & Save DCRR	0.30
9.27.17	Email to Janet re missing VIKZ documents from supplemental production	0.15
9.27.17	Email to Bartlett re Amended Deposition Notice of 30(b)(6) of Zurich	0.15
9.27.17	Review email from client re VIKZ docs that contain credit applications. Review documents. Respond	0.50
9.27.17	Review and respond to email from Jessica Rogers re Viking's 14 th ECC Supp	0.15
9.27.17	Review email from client re Viking's PMK written statements re number of activations. Review of VIKZ documents	0.75
9.27.17	Review email and excel attachment of water damage claim. Respond.	0.50
9.27.17	Review email from client re documents he dropped off at office	0.50
9/27/17	Review Viking's 14th ECC Supplement	2.25
9/27/17	Finalize and pull exhibits for Motion to Strike Viking's Answer	4.0
9.27.17	Review email from DSS re printing email from Robinson for motion and response	0.15
9.28.17	Review email from DSS re points for our reply to the motion to strike and response	0.20
9.28.17	Email chain with DSS re filing motion to strike and affidavit	0.25

INVOICE FOR ASHLEY M. FERREL
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9.28.17	Review email and attachment from DSS re technical data sheet	0.15
9.28.17	Review, Download & Save Third Party Defendant Gilberti Corp LLC Joinder to Exclude Defendants, The Viking Corp and Supply Network, Inc. dba Viking Supplynet's Expert, Jay Rosenthal on OST	0.30
9.28.17	Review, Download & Save Amended Notice of Taking Deposition of Brian Edgeworth [Time Only]	0.30
9.28.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC.'s 11 th Supplement to Early Case Conference Witnesses and Exhibit List	0.30
9/28/17	Draft and serve Plaintiffs' 11 th ECC Supplement	1.5
9.28.17	Review email from client re ISO certification process	0.25
9.28.17	Email chain with client re order from court re Glen Rigdon and response	0.15
9.28.17	Email chain with client re: all supporting documents for calculations of damages	0.25
9/28/17	Draft and send over Motion to De-Designate Confidentiality on OST	4.25
9.28.17	Call with Client	0.15
9.28.17	Call with Client	0.15
9.28.17	Call with Client	0.25
9.29.17	Call with DSS	0.25
9/29/17	Draft written discovery to Lange Plumbing (punitive)	1.0
9.29.17	Review email from Sia re Lange expert depo dates	0.15
9.29.17	Email chain with Robinson re October 26 deposition dates and alternative dates for Viking employees and review of calendar	0.25
9.29.17	Email to Sia, Pancoast, Nunez re draft 9.13.17 DCRR	0.15
9.29.17	Email chain with Max Couvillier and Janet Pancoast re the draft DCRR for 9.20.17 hearing and analysis and Max's proposed changes	0.75
9.29.17	Email chain with DSS re scheduling Carnahan depo	0.25

INVOICE FOR ASHLEY M. FERREL
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9.29.17	Review email from DSS re date mediation briefs due	0.15
9.29.17	Email chain with DSS re draft DCRRs (9.13.17 and 9.20.17)	0.50
9.29.17	Review email from DSS requesting digital photos of damage and response	0.15
9.29.17	Email chain with DSS re drafting Lange written discovery for punitive damages and draft requests	0.20
9.29.17	Review, Download & Save Plaintiffs' 2 nd Set of Requests for Production to Lange Plumbing, LLC	0.30
9.29.17	Review, Download & Save Plaintiffs' 2 nd Set of Interrogatories to Defendant Lange Plumbing, LLC	0.30
9.29.17	Review, Download & Save Plaintiffs' Motion to Strike the Viking Defendants' Answer on Order Shortening Time	0.30
9.29.17	Review, Download & Save OST – Plaintiffs' Motion to De-Designate Viking Confidentiality of Their Documents on an OST	0.30
9/29/17	Review Viking's 14th ECC Supplement	1.5
9/29/17	Review Giberti's Joinder for MIL to Exclude Rosenthal	0.25
9/29/17	Review proposed changes and revise DCRR for 9/20/17 Hearing	0.5
9/29/17	Review proposed changes and revise DCRR for 9/13/17 Hearing	0.5
9/29/17	Draft mediation brief	2.25
9.30.17	Review email from client re VK494	0.25
10.1.17	Review email and attachment created by client of the number VK457 activations	0.50
10/2/17	Draft motion to de-designate	2.5
10/2/17	Research and draft motion to reconsider pro hac	3.0
10.2.17	Review email and attachment with DSS re Glen Rigdon and a motion to exclude him as an expert	0.25
10.2.17	Review, Download & Save The Viking Corporation and Supply Network, Inc.'s Opposition to Plaintiffs' Motion in Limine to Exclude Expert, Jay Roenthal	0.30

INVOICE FOR ASHLEY M. FERREL
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10.2.17	Review, Download & Save Third party Defendant Gilberti Corporation LLC's Joinder to Plaintiffs' Motion to De-Designate Viking's Confidentiality of their Documents on an Order Shortening Time	0.30
10.2.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
10.2.17	Review, Download & Save ROC – Plaintiff's Motion to De-designate confidentiality	0.30
10.2.17	Review, Download & Save ROC- Plaintiffs' Motion to Strike Viking's Answer	0.30
10.2.17	Review email and download deposition from Oasis Reporting (Rough of Brian Edgeworth)	0.25
10.2.17	Review email from client re the BR Stewart article and the incorrect heat analysis. Review all documents listed in email and discuss with DSS	2.0
10.2.17	Review email from client re photos of claims of other VK457s. Then review file in dropbox	1.25
10.2.17	Review email from client and attachment re Viking's letter to fire marshall about "very limited number of activations."	0.50
10.3.17	Email to Sia, Pancoast, Nunez re no objections to 9.13.17 DCRR and advise when signature page ready for pick up	0.15
10.3.17	Review email from Ure re hearing	0.15
10.3.17	Review email from Ure re signature page pick up for Order to Amend	0.15
10.3.17	Review email from client and schedule A of EFT for ECC disclosure	0.25
10.3.17	Review email from client re Rosenthal hearing	0.15
10.3.17	Review and respond to email from Nicole Garcia re signature pages for Ure ready to pick up	0.15
10.3.17	Review email and attachment from client re client's list of activations	0.25

INVOICE FOR ASHLEY M. FERREL
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10.3.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Opposition to Plaintiff's Motion to De- Designate Viking's Confidentiality of their Documents on OST	0.30
10.3.17	Review, Download & Save Plaintiffs' 3 rd Set of Requests for Production to Lange Plumbing, LLC	0.30
10.3.17	Review, Download & Save Plaintiffs' 3 rd Set of Interrogatories to Defendant Lange Plumbing, LLC.	0.30
10.3.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Opposition to Plaintiffs' Motion to Compel Testimony and Evidence of Expert Robert Carnahan or Alternatively Strike Expert	0.30
10.3.17	Review email from DSS re written discovery to Lange that we need to draft and serve	0.25
10.3.17	Email chain with DSS re Schedule A of EFT and supplementing in ECC	0.15
10.3.17	Email chain with DSS re Max Couvillier changes to DCRR	0.25
10.3.17	Review email and attachment from DSS forwarding Viking's Opp to Motion to Compel Carnahan	0.25
10/3/17	Review Viking's Opposition to MIL to exclude Rosenthal	0.5
10/3/17	Prepare and Attend Hearing re: MIL to exclude Rosenthal	2.0
10/3/17	Prepare and serve written discovery to Lange Plumbing	0.5
10/3/17	Draft mediation brief	2.0
10/3/17	Review Giberti's Joinder to Motion to De-Designate Confidentiality	0.25
10/3/17	Review Viking's Opposition to Motion to Compel Carnahan and Email DSS my reply points	1.0
10/3/17	Review and revise 9/20/17 DCRR with Max's comments	0.5
10/4/17	Draft and Serve Plaintiffs' 12 th ECC Supplement	1.0

INVOICE FOR ASHLEY M. FERREL
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10/4/17	Prepare and attend hearing on Motion to Compel Carnahan and Motion to De-designate	3.5
10/4/17	Finalize and pull exhibits for mediation brief	2.5
10/4/17	Finalize and serve Motion to Reconsider Order Granting Motion for Pro Hac Vice	1.5
10.4.17	Email to Pancoast, Sia, Nunez re revised 9.13.17 DCRR	0.15
10.4.17	Review email from Max Couvillier re 9.20.17 DCRR signature page	0.15
10.4.17	Review email from client re phone call with fire marshal James Carver and link to Omega case. Analysis	0.50
10.4.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Granting, LLC.'s 12 th Supplement to Early Case Conference Witnesses and Exhibit List	0.30
10.4.17	Review, Download & Save Plaintiffs' Motion to Reconsider Order Granting The Viking Defendants Motion to Associate Counsel	0.30
10.5.17	Review, Download & Save Transcripts of All Pending Motions – Heard on August 23, 2017	0.30
10.5.17	Review email and download deposition from Oasis Reporting (Giberi)	0.25
10.5.17	Call with DSS	0.10
10.5.17	Review email from client re defendant's purchasing 645 Saint Croix	0.15
10.6.17	Review, Download & Save Third Party Defendant Gilberti Construction LLC's Joinder to Plaintiff's Motion to Strike Viking's Answer on OST	0.30
10.6.17	Review, Download & Save Subpoena Duces Tecum for the Person Most Knowledgeable for Zurich American Insurance Company	0.30
10.6.17	Review, Download & Save Final Amended Notice of Taking Deposition for The Person Most Knowledgeable for Zurich American Insurance Company	0.30

INVOICE FOR ASHLEY M. FERREL
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10.6.17	Email chain from Bartlett re extension to produce list of activations and deposition date	0.25
10.6.17	Email chain with DSS re Amended ZAIC Notice and SDT	0.15
10.9.17	Review email from DSS to Sia re Lange's extension to respond to MSJ against Lange only	0.15
10.9.17	Review email and attachments from DSS to client re demand sheets for mediation	0.25
10/9/17	Review file and pull documents for meeting with mediator	1.5
10/9/17	Meet with Mediator to Discuss Case	1.5
10/9/17	Review Giberti's Joinder to Motion to Strike Viking's Answer	0.25
10.9.17	Review email and download deposition from Oasis Reporting (DeLaRosa)	0.25
10.9.17	Review email and download deposition from Oasis Reporting (Kendrick)	0.25
10.9.17	Email chain from Sia re extension for Opp to MSJ	0.15
10.9.17	Review email from client re Edgeworth lawsuit history	0.15
10.9.17	Review email from client re minimax and shareholders with links	0.25
10.9.17	Email chain with client re: history of activation perjury and response	0.25
10.10.17	Review email from client and attachments re VK457 activation list	0.25
10.10.17	Review email from client re upcoming hearing dates and response after review of calendar	0.25
10.10.17	Review email from client re demand sheet for 1 st mediation	0.20
10.10.17	Call with DSS	0.15
10/10/17	Attend Mediation at JAMS with Floyd Hale	4.0
10.10.17	Review, Download & Save Notice of Vacating Video Deposition of NRCP 30(B)(6) of Designees of Tyco Fire Protection Products	0.30
10.10.17	Review, Download & Save Notice of Taking Video Deposition of NRCP 30(B)(6) of Designees of Reliable Automatic Sprinkler Company, Inc.	0.30

INVOICE FOR ASHLEY M. FERREL
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10.11.17	Review, Download & Save Service of Zurich American Insurance Company's Objections and Statements in Response to Amended NRCP 30(B)(6) Person Most Knowledgeable	0.30
10.11.17	Review, Download & Save Zurich American Insurance Company's Objections and Statements in Response to Amended Subpoena Duces Tecum	0.30
10.11.17	Review, Download & Save COMM to Take Out of State Deposition of Person Most Knowledgeable for Underwriters Laboratories, Inc.	0.30
10.11.17	Review, Download & Save Application to Take Out of State Deposition of Person Most Knowledgeable for Underwriters Laboratories, Inc.	0.30
10.11.17	Review, Download & Save Declaration of Janet C. Pancoast in Support of Opposition to Plaintiffs' Motion to Strike the Viking Defendants' Answer on Order Shortening Time	0.30
10.11.17	Review, Download & Save Defendant The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Opposition to Plaintiffs' Motion to Strike The Viking Defendants' Answer on Order Shortening Time	0.30
10.11.17	Review, Download & Save Subpoena Duces Tecum for 30(B)(6) of the Designees of Underwriters Laboratories	0.30
10.11.17	Review, Download & Save Amended Notice of Taking Deposition Duces Tecum Pursuant to NRCP 30(B)(6) of Designees of Underwriters Laboratories, Inc.	0.30
10.11.17	Review, Download & Save Exhibits to Lange Plumbing's Opposition to Plaintiffs' Motion for Summary Judgment and Bifurcate Trial	0.30
10.11.17	Review, Download & Save Defendant Lange Plumbing's Opposition to Plaintiffs' Motion for Summary Judgment and Motion to Bifurcate Trial and Countermotion to Strike	0.30

INVOICE FOR ASHLEY M. FERREL
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10.11.17	Review email and attachment from Rose Hernandez Zurich's objections to SDT	0.15
10.11.17	Review email from Robinson re Ortyl's last known address	0.15
10.11.17	Review email from Bartlett re extension to produce list of activations and deposition date	0.15
10.11.17	Review email from client re portion of Viking's brief and response to client	0.25
10.11.17	Review email from client re his thoughts on Viking's Opp to Motion to Strike and analyze thoughts	0.50
10.11.17	Email chain with client re depositions on calendar and response	0.50
10.11.17	Review email from client re Glen Rigdon entrance into neighborhood and order from judge and response	0.15
10.11.17	Email chain with client and DSS re Lange's Opposition to MSJ	0.50
10.11.17	Review email from client re Margaret Ho's depo and response	0.15
10.11.17	Review email from client re opps to MSJ and response	0.15
10.11.17	Email chain with client, DSS, Sia and Mark re Lange's payment	0.15
10.11.17	Email from client re how payment between AG and EFT is recorded and analyzed for argument in MSJ	0.50
10.11.17	Email to Bartlett re denial of any further extensions to produce list of activations	0.15
10.11.17	Review email from client re MiniMax/Viking Credit Status	0.15
10.11.17	Email chain with DSS re phone message from Pancoast	0.15
10/11/17	Draft and serve amended notice, SDT, application to take depo out of state and commission to take depo out of state for UL Labs	1.5
10/11/17	Phone call with service company in Chicago Illinois for UL Lab Subpoena	0.25
10/11/17	Review and analyze Lange's Opposition to Motion for Summary Judgment	1.25
10/12/17	Review Zurich's Objections and Responses to PMK Depo and SDT	1.0

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10/12/17	Take Notice of Non-Appearance for Zurich PMK	0.5
10/12/17	Review and analyze Viking's Opposition to the Motion to Strike Answer	1.25
10/12/17	Draft and re-serve all Viking employee depositions, Harold Rogers and Viking Group; email discussions with Robinson re: depo times	3.0
10.12.17	Review forwarded emails from Wiznet from DSS re filed transcripts	0.15
10.12.17	Call with Client	0.25
10.12.17	Review, Download & Save COMM to Take out of State Deposition for Harold Rodgers	0.30
10.12.17	Review, Download & Save COMM to Take Out of State Deposition of Person Most Knowledgeable for Viking Group Inc.	0.30
10.12.17	Review, Download & Save Application for Issuance of Commission to Take out of State Deposition of Harold Rodgers	0.30
10.12.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Person Most Knowledgeable for Viking Group, Inc.	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for NRCP 30(B)(6) of Designees of Viking Group, Inc.	0.30
10.12.17	Review, Download & Save Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(B)(6) of Designees of Viking Group, Inc.	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Harold Rodgers	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Taking Deposition of Harold Rodgers Duces Tecum	0.30
10.12.17	Review, Download & Save Plaintiffs' 2 nd Amended Notice of Entry Upon Land / Site Inspection	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for James Golinveaux	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Video Deposition of James Golinveaux Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Kevin Ortyl	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.12.17	Review, Download & Save 2 nd Amended Notice of Taking Deposition of Kevin Ortyl Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Tom O'Connor	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Video Deposition of Tom O'Connor	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Jeff Norton	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Video Deposition of Jeff Norton Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Sherry Simmons(Sherry Bailey)	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Video Deposition of Sherry Simmons (Sherry Bailey) Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Doug Bensinger	0.30
10.12.17	Review, Download & Save Amended Notice of Video Deposition of Doug Bensinger Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Mike Bosma	0.30
10.12.17	Review, Download & Save 2 nd Amended Notice of Taking Deposition of Mike Bosma Duces Tecum	0.30
10.12.17	Review, Download & Save Subpoena Duces Tecum for Devin ODell	0.30
10.12.17	Review, Download & Save 2nd Amended Notice of Video Deposition Devin Odell	0.30
10.12.17	Review, Download & Save Transcript of All Pending motions – heard on October 4, 2017	0.30
10.12.17	Email chain with Robinson re deposition scheduling of Viking employees for week of 11/13/17 and review of calendar and confirmation of who they will accept service	0.75
10.12.17	Email chain with client re searchable indexes and response	0.25
10.12.17	Review email from client re Sklar Williams invoice	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.12.17	Review email from client re depositions of UL people	0.15
10.12.17	Review email from client re his opinion of the best documents to use for Motion to Strike. Review documents and analyze	1.0
10.12.17	Review email from client with attachment with summary of points for Viking's argument	0.50
10.12.17	Review email from client with attachment re Henderson activation	0.25
10.12.17	Email chain with Sia re Zurich PMK depo	0.15
10.13.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Supplement to Opposition to Plaintiffs' Motion to Strike The Viking Defendants' Answer on Order Shortening Time	0.30
10.13.17	Review, Download & Save Amended Notice of Deposition of Kevin Hastings	0.30
10.13.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Privilege Log	0.30
10.13.17	Email to Kershaw, Pancoast, Sia and Nunez re Revised Order granting motion to Amend	0.25
10.13.17	Review email and download deposition from Oasis Reporting (Brian Edgeworth)	0.25
10.13.17	Review email from Bartlett re production of ZAIC activations	0.15
10.13.17	Email to Hastings re amended deposition notice	0.15
10.13.17	Review email from client re Harold Rogers missing attachment	0.15
10.13.17	Review email and links from client re Kevin Ortyl and Scott Franson's employment at Viking corp vs. group	0.50
10.13.17	Review email and attachment from client re UL document with Franson watermark	0.25
10.13.17	Email chain with client re Viking's searchable indexes and response	0.25
10.13.17	Email to Pancoast re dialect Margaret Ho speaks	0.15
10.13.17	Email to client with VKG documents	0.15
10.13.17	Email to client re Notice of Privilege Log Production and attachment	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.13.17	Email with client reemployment status and link of Kevin Ortyl	0.15
10.13.17	Email chain with client re Margaret Ho dialect and depo	0.15
10/13/17	Revise Reply on Motion to Strike	2.25
10/13/17	Review Viking's Privilege Log	0.75
10/13/17	Draft 10-4-17 DCRR and Draft Order re Rosenthal	4.0
10.14.17	Review email and attachment from client re actual max load calculation	0.25
10.14.17	Review email from client re his chart of activations	0.15
10.15.17	Review email from Nunez re using his previous signature for Order granting Motion to Amend	0.15
10.15.17	Review email from client re missing pages in PowerPoint disclosed. Locate document and respond	0.50
10.15.17	Email chain with Kershaw re Revised Order Granting Motion to Amend	0.15
10.15.17	Review email from client re his opinion of the activations and "clearest lies" and analyze	1.0
10.16.17	Review email and attachment from Rose Hernandez Zurich's motion to quash	0.25
10.16.17	Review email from Robinson re re-scheduling Hasting and Zamiski's depositions	0.15
10.16.17	Review email from Robinson re Franson's last known address	0.15
10.16.17	Review email from client re KPS activations in newly produced documents and analyze	0.25
10.16.17	Email chain with client re Rigdon order from Court	0.20
10.16.17	Review email and VIKZ attachment from client and determine which documents we need to request	0.75
10.16.17	Review email from client re VIKZ document cited in email. Locate document. Review document. Analyze and respond	1.0
10.16.17	Review email from client with attachment re Cal Atlantic activations, which were not disclosed	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.16.17	Review email from client and attachment re Dews Fire protection Email, KPS Emails and Bates Proof attachment	0.25
10.16.17	Review email from client re Pancoast declaration and the UL test record document attachments	0.25
10.16.17	Review email and attachment from client re UL	0.25
10/16/17	Pull documents for Margaret Ho Deposition	0.25
10/16/17	Review Zurich's Motion for Protective Order and begin drafting Opposition	4.25
10/16/17	Finalize and serve Reply to Motion to Strike Viking's Answer	1.25
10.16.17	Email chain with DSS re Franson's last known address	0.15
10.16.17	Review email from DSS re Viking's production of Carnahan's depo and response	0.15
10.16.17	Review email and attachment from DSS re production of Rapid Cash ad and response	0.15
10.16.17	Email chain with DSS re Viking's 15 th ECC Supp	0.15
10.16.17	Email chain with DSS and client re supplementing motion to strike	0.15
10.16.17	Review, Download & Save RPLY to Viking's Opposition to Plaintiffs Motion to Strike the Viking Defendants' Answer on Order Shortening Time	0.30
10.16.17	Review, Download & Save Lange Plumbing's 11 th Supplemental 16.1 Disclosures	0.30
10.16.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 15 th Supplemental Disclosures Pursuant to NRCP 16(a)(1)	0.30
10.16.17	Review, Download & Save Non – Party Zurich American Insurance Company's Motion for a Protective Order, or in The Alternative to Quash Subpoenas	0.30
10.16.17	Call with Client	0.15
10.16.17	Call with DSS	0.15
10.16.17	Call with Client	0.25
10.16.17	Call with Client	0.15
10.16.17	Call with Client	0.15
10.17.17	Call with DSS	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.17.17	Call with DSS	0.15
10.17.17	Review, Download & Save Supp Reply to Viking's Opposition to Plaintiffs' Motion to Strike the Viking Defendants' Answer on Order Shortening Time	0.30
10.17.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Request for Production to Plaintiff [2 nd Set]	0.30
10.17.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Notice of Compliance with Order on Plaintiff's Motion to Compel – Pleading Only	0.30
10.17.17	Review, Download & Save PLT 171016 Edgeworth ES Ltr Simon re EDCR 2.34 re Pomerantz	0.30
10.17.17	Review email from Robinson re Koch depo availability	0.15
10.17.17	Email chain with Sheri Kern with Direct Legal Support in CA (process server) re domestication of subpoena and payment	0.25
10.17.17	Review email from client re new Lange disclosure and response	0.25
10.17.17	Review email from client re Lange's threat to lien his house and research of whether lien valid	1.0
10.17.17	Review email and attachment from client re Margaret's 2 nd promissory note for ECC disclosure	0.20
10.17.17	Review email from client re his opinion of Viking's responses to written discovery	0.25
10.17.17	Email chain with DSS re 2.34 re Pomerantz as expert	0.15
10.17.17	Email chain with DSS re research for Reply to Lange MSJ	0.50
10.17.17	Email chain with DSS re depo cites for Reply to Lange MSJ	0.75
10/17/17	Review Viking's 15 th ECC Supplement and Lange' 11 th ECC Supp	2.0
10/17/17	Review Viking's Notice of Compliance with Motion to Compel	0.5
10/17/17	Draft and serve Supplement to Reply to Motion to Strike	3.75
10/17/17	Prepare for Hearing on Motion to Strike	1.5

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10/18/17	Prepare and Attend Hearing on Plaintiffs' motion to Strike Viking's Answer	5.25
10.18.17	Review email from DSS re supplement to Motion to strike and response	0.75
10/18/17	Review Viking's Written Discovery Responses and Discussion with DSS	1.25
10/18/17	Revise Reply to Lange Opposition to MSJ	1.0
10.18.17	Review, Download & Save Defendant The Viking Corporation's Responses to Plaintiffs' Requests for production of Documents, Set Five	0.30
10.18.17	Review, Download & Save Defendant The Viking Corporation's Responses to Plaintiffs' Interrogatories, Set Four	0.30
10.18.17	Review, Download & Save Defendant The Viking Corporation and Supply Network, Inc.'s Responses to Plaintiffs' Fourth Request for Admissions	0.30
10.18.17	Review, Download & Save ROC for Defendants The Viking Corporation and Supply Network, Inc.'s Privilege Log	0.30
10.18.17	Review, Download & Save ROC for Defendants The Viking Corporation and Supply Network, Inc.'s 15 th Supplemental Disclosures	0.30
10.18.17	Review email from Judicial Attorney Services in Chicago IL re UL Depo service	0.25
10.18.17	Review email from client re max load hang test and attachments	0.50
10.18.17	Review email from client re download of RFAs	0.15
10.18.17	Review email from client re his responses to written discovery	0.25
10.18.17	Email chain with client and DSS re Henderson activation and attachment	0.50
10.19.17	Review email from client re analysis of Viking PMK depo re bending and review of depo	0.50
10.19.17	Review email and attachment from client re activations list	0.50
10.19.17	Email chain with client re locating documents. Located documents in system and responded	1.0
10/19/17	Review Giberti's Motion for Good Faith Settlement	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.19.17	Review email from DSS to Floyd Hale re mediation	0.15
10.19.17	Review email and attachment from DSS re supplementing documents including El Segundo letter and response	0.20
10.19.17	Email chain with DSS re Giberti Motion for Good Faith Settlement and whether we will oppose	0.15
10.19.17	Email chain with DSS re Olivas depo and Pancoast email	0.15
10.19.17	Review, Download & Save Third Party Defendant Giberti Construction LLC's Motion for Good Faith Settlement	0.30
10.19.17	Review, Download & Save DCRR- Hearing 8.23.17	0.30
10.19.17	Review, Download & Save CES of UL Depo Notice	0.30
10.19.17	Review, Download & Save AOS of UL Depo	0.30
10.19.17	Review, Download & Save SUBP UL Depo	0.30
10.19.17	Review, Download & Save CES of Harold Rodger Depo Notice	0.30
10.19.17	Review, Download & Save AOS of Harold Rodgers	0.30
10.19.17	Review, Download & Save SUBP of Harold Rodgers	0.30
10.19.17	Review, Download & Save ROC for Defendants the Viking Corporation and Supply Network, Inc.'s Exhibits to Notice of Compliance with order on Plaintiffs' Motion to Compel	0.30
10.19.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
10/19/17	Draft 2 nd Supplement to Reply to Motion to Strike Viking's Answer	4.5
10/20/17	Conference Call with UL Lawyers & Discussion with DSS	0.5
10.20.17	Email chain from client re chart with corrections to KPS example	0.25
10.20.17	Review email from client re another sprinkler head activation in UK	0.15
10/20/17	Revise and serve MIL to Exclude Carnahan	3.75
10/20/17	Revise and submit order with letter to Judge Jones re Motion to Amend Complaint	1.0

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.20.17	Review, Download & Save OST – Plaintiffs Motion in Limine to Exclude Defendants The Viking Corporation and Supply Network, Inc., dba Viking Supplynet’s Expert Robert Carnahan on Order Shortening Time	0.30
10.20.17	Review, Download & Save Transcripts of Proceedings Tuesday, October 3, 2017	0.30
10.20.17	Review email from DSS re inserting hidden activation information into supplement and response	0.15
10.21.17	Review email from client with attachment re response to why 287 not all duplicates	1.0
10.21.17	Review email and attachment from client re activations	0.50
10.21.17	Email chain with DSS re pre-lien notice form Lange	0.15
10.23.17	Review email from DSS re Opp to Zurich Motion and response	1.0
10.23.17	Email chain with DSS re supplement to motion to strike	0.20
10.23.17	Review, Download & Save Plaintiffs’ Reply to Motion for Summary Judgment Against Lange Plumbing, LLC, Only and Reply to Opposition to Motion to Bifurcate Trial and opposition to Strike Matters from the Record	0.30
10.23.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC’s 13 th Supplement to Early Case Conference Witness and Exhibit List	0.30
10.23.17	Review, Download & Save Second Supplement to Reply to Viking’s Opposition to Plaintiffs’ Motion to Strike the Viking Defendants’ Answer on Order Shortening Time	0.30
10.23.17	Review, Download & Save Notice of Association of Counsel	0.30
10.23.17	Review, Download & Save ROC – Motion to Exclude Viking’s Expert Carnahan	0.30
10.23.17	Review email from Bartlett (Zurich) re ZAIC’s production	0.25
10.23.17	Review email from client re VIKZ019271 and analysis of document	0.50
10.23.17	Review email from client re UL	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.23.17	Review email from client re his comments on our draft of the supplement to motion to strike Viking's answer	0.25
10.23.17	Review email and attachment from client re counter to Viking argument in brief re 170	1.0
10.23.17	Review email from client re Viking and Jeff Norton and James Carver (fire marshal letter) with attachment	0.50
10.23.17	Review email and attachment from client re VK456 strength on heat responsive element testing	0.50
10.23.17	Email to client with Reply to MSJ Against Lange	0.15
10.23.17	Email to client with 2 nd Supplement to Motion to Strike Viking's Answer	0.15
10.23.17	Review email and attachments from client re clarifications and respond	0.75
10/23/17	Review Viking's Joinder to Lange's Opposition to the MSJ	0.25
10/23/17	Draft and serve Plaintiffs 13th ECC Supplement; Discussion with DSS	1.5
10/23/17	Revise Opposition to Zurich Motion for Protective Order	1.5
10/23/17	Revise and serve 2 nd Supplement to Reply to Motion to Strike Viking's Answer	2.5
10/23/17	Finalize and serve Reply to MSJ against Lange	1.25
10.23.17	Call with Client	0.10
10.24.17	Call with Client	0.25
10/24/17	Draft and Serve supplement to Reply to MSJ Against Lange	4.5
10.24.17	Review, Download & Save Notice of Deposition of Kevin Hastings Off Calendar	0.30
10.24.17	Review, Download & Save RTRAN-Recorders Transcript of Hearing – Re: All Pending Motions – heard on October 18, 2017	0.30
10.24.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Joinder to Lange Plumbing, LLC's Opposition to Plaintiffs' Motion for Summary Judgment with Additional Points and Authorities	0.30

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.24.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Opposition to Plaintiffs' Motion to Reconsider Order granting the Viking Defendants' Motions to Associate Counsel	0.30
10.24.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Notice of Non – Opposition to Third – Party Defendant Giberti Construction, LLC's Motion for Determination for Good faith Settlement	0.30
10.24.17	Email to Pancoast re missing documents from Viking's 15 th ECC Supplement	0.25
10.24.17	Review email from client re Burgoyne's Report disclosed by Viking and comparison to the one from UK	1.0
10.24.17	Review email from client re his comments on ZAIC's incomplete disclosure, analysis, and response	1.0
10.24.17	Review email from client re his audit of newly disclosed documents and analysis	0.75
10.24.17	Email chain with DSS re Burgoyne report and Sherry Simmons email	0.25
10.25.17	Review email from DSS re new topic for 30(b)(6) notice and written discovery to Viking and response	0.25
10.25.17	Review email from DSS to Bartlett re ZAIC's position of list of activations	0.15
10.25.17	Review, Download & Save Supplement to Plaintiffs' Reply to Motion for Summary Judgment Against Lange Plumbing, LLC, Only and Reply to Viking's Joinder	0.30
10/25/17	Draft Written Discovery to Viking; Discussion with DSS	2.25
10/25/17	Finalize and send out DCRR for 10.4.17 and the Order Granting Motion to Exclude Rosenthal	1.5
10.25.17	Email to Jessica Rogers re missing Viking documents	0.15
10.25.17	Email to Sia, Kershaw, Pancoast, Ure re 10.4.17 DCRR	0.15
10.25.17	Email chain with DSS and Bartlett (Zurich) re ZAIC's production	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.25.17	Review email and attachment from client re Viking's misrepresentations	0.50
10.25.17	Review email from client and analyze re activations	0.75
10.25.17	Email chain with client re draft written discovery to Viking and corrections to written discovery	1.0
10.25.17	Review email from client and attachment re best docs for perjury by counsel proof	1.0
10.25.17	Email chain with client re: Zurich lawyers response to ZAIC's list of activations	0.50
10.25.17	Review email from client re comparing ZAIC activations to Viking's disclosed activations	0.50
10.25.17	Review email from client re economic interest in MiniMax	0.15
10.25.17	Email chain with client re documents from Viking disclosure and review of attachments and response	1.0
10.25.17	Call with Client	0.40
10.26.17	Call with DSS	0.25
10.26.17	Review email from DSS to client re explanation of OOJ	0.15
10.26.17	Review email from DSS re Nunez request of what happened at Motion to strike hearing	0.15
10.26.17	Review, Download & Save Defendants the Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Opposition to Plaintiffs' Motion in Limine to Exclude Defendants the Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Expert, Robert Carnahan	0.30
10.26.17	Review, Download & Save Plaintiffs' 5 th Set of Interrogatories to Defendants The Viking Corporation	0.30
10.26.17	Review, Download & Save Plaintiffs' 6 th Set of Requests for Production to Defendants The Viking Corporation	0.30
10.26.17	Review, Download & Save Plaintiffs' 5 th Set of Requests for Admission to Defendants The Viking Corporation	0.30
10.26.17	Review email from client and attachment of activations	1.0

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.26.17	Review email from Nunez re Motion to Strike	0.15
10.26.17	Review email from client re responses to Viking's written discovery	0.25
10.26.17	Review email from client re OOJ	0.15
10.26.17	Review email from client re UL testing website	0.25
10.26.17	Review email from client and attachment of Viking presentation- Residential Sprinklers Best Practices	1.0
10.26.17	Email to Sia, Pancoast, Ure and Kershaw re Order Granting MIL to exclude Rosenthal	0.15
10.26.17	Review email and attachment from client re example of incomplete disclosure based off Viking's own documents	0.50
10/26/17	Draft Written Discovery to Viking; Discussion with DSS	1.25
10/26/17	Draft DCRR from 10-24-17 Hearing	3.5
10/26/17	Review Viking's Opposition to MIL to Exclude Carnahan and analyze what we need for oral reply	2.5
10.27.17	Review email from DSS to Pancoast re Stipulation on MILS	0.15
10.27.17	Call with DSS	0.25
10.30.17	Review, Download & Save Notice of Withdrawal of Counsel	0.30
10.30.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Request for Production to Plaintiffs	0.30
10.30.17	Review, Download & Save- Defendants The Vikings Corporation and Supply Network, Inc.'s Interrogatories to Plaintiffs	0.30
10.30.17	Review email from client re depo of Cadden of temps	0.50
10.30.17	Review email from Kershaw re the 10.4.17 DCRR	0.50
10.30.17	Review email from client re Robinson's Motion and the supporting depositions we have for temps 100 exposure and pull excerpts from depositions of Cadden, Giberti, Edgeworth to rebut argument	1.0
10.30.17	Review email and download deposition from Oasis Reporting (Ho)	0.25
10.30.17	Review email from client re his analysis of Robinson's heat argument	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10.30.17	Email chain with client re Sia's filing	0.15
10.30.17	Review email from client re Robinson Opp and argument why Viking is wrong with attachment	0.25
10.30.17	Review email and respond to client re Glen Rigdon order	0.25
10.30.17	Review email from client re questions for UL lawyers	0.50
10.30.17	Email chain with client re Robinson Opp and Bernie's depo. Revise and analyze Viking Opp, pull Bernie depo and respond to client	1.0
10.30.17	Review email from client re Viking's Opp to Exclude Carnhan	0.50
10.30.17	Review and respond to email from client re notice of withdrawal of counsel	0.15
10.30.17	Review email from client re regulators Viking has informed no testing on VK457	0.25
10.30.17	Call with DSS	0.15
10/30/17	Prepare for Hearing for MIL to Exclude Carnahan & MSJ Against Lange	2.0
10/30/17	Draft Reply to Motion to Reconsider Pro Hac	4.0
10.30.17	Review email from DSS re new written discovery to Viking and response	0.20
10.30.17	Review email from DSS to client re Edgeworth discovery responses	0.15
10.31.17	Review email from DSS re email to Pancoast re English version of the insurance policy and response	0.15
10.31.17	Email chain with DSS re UL notice and UL production of documents	0.15
10.31.17	Review, Download & Save Second Amended Notice of Deposition of John Olivas	0.30
10.31.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. 's Objection to Discovery Commissioners' Report and Recommendation on Defendants' Motion to Compel Home Inspection	0.30
10/31/17	Prepare and Attend Hearing for MIL to Exclude Carnahan & MSJ Against Lange Plumbing	3.0

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

10/31/17	Revise DCRR from 10-24-17 hearing and send to counsel and DC Bulla	1.25
10/31/17	Draft Motion to Compel Viking Financials	3.25
10.31.17	Email to Robinson and Parker re 10.24.17 DCRR	0.15
10.31.17	Email to Susan McNicolas re UL Depo and documents	0.15
10.31.17	Review email from Robinson re Carnahan availability and discussion with DSS	0.15
10.31.17	Review email from Kershaw re Viking's changes to Order granting MIL to exclude Rosenthal	0.75
10.31.17	Review email from client re activations and response	0.20
11.1.17	Email chain with DSS re Viking document production (Martorano's depo in FSS and Thorpe)	0.50
11.1.17	Review email from DSS re calendar and deposition re-scheduling	0.15
11.1.17	Review email and attachment from DSS re picture for reply	0.15
11.1.17	Review and respond to email from Francesca Haak with DC Bulla re hearing transcript	0.15
11.1.17	Email to Pancoast requesting Viking's excess policy in English	0.15
11.1.17	Email to Bartlett re Plaintiff's Opp to Zurich's Motion for Protective Order	0.15
11.1.17	Review email from client and attachments re Viking baking their links	1.0
11.1.17	Review email chain with client, DSS, AMF re activations and analyze	1.0
11.1.17	Review email from client re UL people	0.15
11.1.17	Review email and attachment from client re Letter from UL re bent lever bars	0.25
11.1.17	Review, Download & Save Plaintiffs 6 th Set of Requests for Admission to Defendants The Viking Corporation	0.30
11.1.17	Review, Download & Save Plaintiffs 6 th Set of Interrogatories to Defendants the Viking Corporation	0.30
11.1.17	Review, Download & Save Plaintiffs 7 th Set of Requests for Production to Defendants the Viking Corporation	0.30

INVOICE FOR ASHLEY M. FERREL
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11.1.17	Review, Download & Save Plaintiffs opposition to Non – Party Zurich American Insurance Company’s Motion for a Protective Order, or in the Alternative to Quash Subpoenas and Counter – Motion to Compel	0.30
11.1.17	Review, Download & Save MSTR- Defendants The Viking Corporation and Supply Network, Inc.’s Motion to Strike Plaintiffs’ Untimely Disclosed Expert Crane Pomerantz and Request for Order Shortening Time	0.30
11.1.17	Review, Download & Save Defendants the Viking Corporation and Supply Network, Inc’s Motion to Stay Enforcement of Discovery Commissioner’s Report and Recommendation Pursuant to EDCR 2.34 and Request for order Shortening Time	0.30
11/1/17	Draft written discovery to Viking	1.0
11/1/17	Draft Motion to Compel Depositions and Reports	3.5
11/1/17	Review Objection to the DCRR re: Motion to Compel Home Inspection	0.25
11/1/17	Finalize and serve Opposition to Zurich’s Motion for Protective Order	3.0
11/2/17	Review and Draft Responses to Viking’s Written Discovery to Edgeworth	1.25
11/2/17	Review Viking’s Motion to Stay Enforcement of the 10.24.17 DCRR and Request for EDCR 2.34 (e) relief	0.25
11/2/17	Draft Reply to Motion to Reconsider Pro Hac	4.25
11.2.17	Email chain with client re accountant	0.25
11.2.17	Email to Teddy Parker re status of Lange’s discovery responses and extension	0.15
11.2.17	Review email from client re what he thinks is important from Carnahan depo for MIL to Exclude	1.0
11.2.17	Review, Download & Save ORDR – Order Granting Plaintiffs Motion to Amend the Complaint to Add Viking Group , Inc.	0.30
11/2/17	Review Viking’s 16 th ECC Supplement (Carnahan Docs from FSS)	1.0
11/2/17	Review Viking’s Motion to Strike Pomerantz on OST and analyze	0.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

11.2.17	Call with DSS	0.40
11.3.17	Call with Client	0.25
11.3.17	Call with Client	0.15
11/3/17	Finalize and serve Reply to Motion to Reconsider Pro Hac	1.25
11/3/17	Finalize and serve Motion to Compel Depositions and Reports	1.5
11/3/17	Finalize and serve motion to Compel Viking Financials	0.75
11/3/17	Draft Reply to Plaintiffs' MIL to Exclude Carnahan	2.75
11/3/17	Draft responses to Viking's written discovery to Edgeworth	0.5
11/3/17	Review Robinson response regarding Viking's position on providing the Thorpe and FSS depositions via 4 th set of RFP and attached cases	2.5
11.3.17	Review email from DSS to Robinson re DCRR from 10/24/17 hearing	0.15
11/3/17	Review letter from Robinson re revisions to the 10/24/17 DCRR; and discuss with DSS	1.25
11.3.17	Email chain with Jessica Rogers re conference call with DC Bulla	0.15
11.3.17	Email chain with Robinson re Viking's Responses to 4 th Set of RFP's and analysis	0.75
11.3.17	Review email and attachment from Robinson re changes to the 10.24.17 DCRR	0.50
11.3.17	Email chain with Robinson re deposition scheduling of Viking employees around first week of December and review of calendar	0.25
11.3.17	Review email from client re drop ceiling and pics	0.15
11.3.17	Review, Download & Save Correspondence to Discovery Commissioner Bulla regarding the 10.24.17 DCRR	0.30
11.5.17	Review email from client and attachment re significant events in case and analyze	0.50
11.6.17	Review email from client re Carnahan depo and load creep	1.0
11.6.17	Email to UL re conference call re UL deposition and documents	0.15
11.6.17	Email chain between AMF, DSS and client re Viking's 17 th ECC Supplement	0.50

INVOICE FOR ASHLEY M. FERREL
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11/6/17	Revise Reply Plaintiffs MIL to Exclude Carnahan	3.25
11/6/17	Review Viking's 17 th ECC Supplement	1.5
11/6/17	Review Viking's 16 th ECC Supplement (Carnahan Docs from FSS)	2.0
11/6/17	TC with Susan McNicholas at UL re deposition scheduling and document production	0.25
11.6.17	Review email from DSS re calling UL attorney and response	0.15
11.6.17	Review email from DSS re mediation and response	0.15
11.6.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 17 th Supplemental Disclosure Pursuant to NRCP 16	0.30
11.6.17	Review, Download & Save Letter Discovery Commissioner Bulla re TC Confirmation and DCRR 10.24.17	0.30
11.6.17	Review, Download & Save Plaintiffs Motion to Compel Viking Documents and for Order to Respond to Discovery Regarding Their Financial information on Order Shortening time	0.30
11.6.17	Review, Download & Save Plaintiffs Motion to Compel Viking Documents and for order to Respond to Discovery on Order Shortening Time	0.30
11.6.17	Review, Download & Save Reply to Viking's Opposition to Plaintiffs Motion to Reconsider order Granting the Viking Defendants Motions to Associate Counsel	0.30
11.7.17	Call with DSS	0.15
11.7.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 18 th Supplemental Disclosures pursuant to NRCP 16	0.30
11.7.17	Review, Download & Save Plaintiffs' Reply to Viking's opposition to Motion in Limine to Exclude Defendants The Viking Corporation and Supply Network, Inc., dba Viking Supplynet's Expert Robert Carnahan on Order Shortening Time	0.30
11.7.17	Review, Download & Save Letter Simon re MT Strike DCRR	0.30

INVOICE FOR ASHLEY M. FERREL
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11.7.17	Review, Download & Save Letter to Discovery Commissioner Bulla re Conf Call Exemplar	0.30
11.7.17	Review, Download & Save Notice of Deposition of Greg Fehr off Calendar	0.30
11.7.17	Review, Download & Save ROC of Plaintiff's Motion to Compel Financials and Motion to Compel Documents	0.30
11.7.17	Review email from Oasis re confirmation of Carnahan depo	0.25
11.7.17	Email chain with Robinson re site inspection on November 15 th	0.25
11.7.17	Review email from client and his excel documents with multiple tabs	1.5
11/7/17	Draft Continued Deposition Notices of Carnahan	0.5
11/7/17	Review DCCR from 10.24.17 returned from Bulla and make revisions	1.5
11/7/17	Finalize and serve Reply to MIL to Exclude Carnahan	2.0
11/7/17	Discussion with DSS re case	0.5
11/7/17	TC with Oasis scheduling and discussion with Janelle re re-scheduling Carnahan depo	0.25
11.7.17	Review email from DSS re drafting motion to compel financial information from Lange and response	0.15
11.7.17	Review email from DSS with attached letter from Parker	0.25
11.7.17	Review email from DSS re sending information to Pomerantz and response	0.15
11.8.17	Review, Download & Save Substitution of Attorneys for Lange Plumbing	0.30
11.8.17	Review, Download & Save Subpoena Duces Tecum for Robert Carnahan PE	0.30
11.8.17	Review, Download & Save Notice of Continued Video Deposition of Robert Carnahan, P.E. Duces Tecum	0.30
11.8.17	Review email from Evelyn Chun re depo notice of Rob Carnahan	0.15
11/8/17	Finalized and serve Amended Notice and SDT for Robert Carnahan	0.5
11/8/17	TC with Jenny at Rene Stone & Associates re: deposition is FSS/Thorpe case	0.5

INVOICE FOR ASHLEY M. FERREL
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11/8/17	Review Viking's 18 th ECC Supplement	1.0
11/8/17	Draft Motion to Compel Financial documents from Lange Plumbing on OST	2.0
11/9/17	Draft and serve deposition notice and subpoena for Athanasia Dalacas	0.25
11/9/17	Review Zurich Reply to Motion for Protective Order	0.5
11/9/17	Revise DCRR for 10/24/17 hearing, serve and send over; Discussion with DSS	1.75
11/9/17	Finalize DCRR for 10/4/17, serve and send over	0.75
11/9/17	Finalize Order to exclude Rosenthal, serve and send over	0.75
11/9/17	Review 10/24/17 Transcript and conference call with Discovery Commissioner Bulla	1.0
11/9/17	TC with Mr. Parker re: case	0.5
11/9/17	Prepare for mediation	1.5
11/9/17	Review Pancoast letter and competing DCRR re Motion to Strike	0.25
11.9.17	Review email from DSS resending information to Pomerantz and response	0.15
11.9.17	Review email forwarded from DSS with Olivas job file for deposition	0.50
11.9.17	Email chain with Debbie Holloman re mediation brief	0.20
11.9.17	Review email from Susan McNicholas re UL deposition and documents	0.15
11.9.17	Email to UL re setting the UL deposition and acquiring the documents requested	0.15
11.9.17	Review, Download & Save Subpoena Duce Tecum to Athanasia EW. Dalacas, Esq.	0.30
11.9.17	Review, Download & Save Notice of Video Deposition of Athanasia E. Dalacas, Esq.	0.30
11.9.17	Review, Download & Save Non Party Zurich American Insurance Company's Reply to Plaintiff's Opposition to Motion for a Protective order, or In the Alternative to Quash Subpoenas, and Counter Motion to Compel	0.30
11.9.17	Review, Download & Save Correspondence to Judge Jones re Order Granting MIL to Exclude Jay Rosenthal	0.30
11.9.17	Review, Download & Save Correspondence to Discovery Commissioner Bulla regarding the 10.4.17 DCRR	0.30

INVOICE FOR ASHLEY M. FERREL
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11.9.17	Review, Download & Save Correspondence to Discovery Commissioner Bulla regarding the 10.24.17 DCRR	0.30
11.10.17	Multiple emails to Crane Pomerantz with additional documents for his review	0.25
11.10.17	Review email from client re Viking presentation of Best practice and forward to Crane Pomerantz	0.25
11/10/17	Mediation with Floyd Hale	4.0
11/13/17	Review Viking's competing DCRRs and Order to strike Rosenthal and analyze with the transcripts/minutes	1.25
11/13/17	Review Viking's Motion to Compel Settlement Conference; Research and draft notes for opposing argument	1.5
11/13/17	Review and pull documents from the federal court case of Viking v/ Harold Rodger, et al	2.5
11/13/17	TC with Charles Rego with UL re deposition and production of documents	0.25
11/13/17	Discussion with DSS re case; Prepare and pull documents for the hearing on 11/14/17	1.5
11.13.17	Review email from DSS to client re hearing on 11/14/17	0.15
11.13.17	Review email and attachment from DSS	0.15
11.13.17	Email chain with DSS re complaint filed against Harold Rodgers	0.25
11.13.17	Review email from DSS re research re privilege log and confidentiality issues and response	0.75
11.13.17	Review email from DSS re supplementing Pomerantz opinion letter	0.15
11.13.17	Email chain with DSS re expert depositions noticed by Viking	0.15
11.13.17	Review email from DSS to George Ogilvie with documents for the contract issue	0.15
11.13.17	Review email from Charles Rego re UL deposition and documents	0.15
11.13.17	Email to Susan McNicholas re UL Deposition	0.15
11.13.17	Review email from client and attachment of "red and black chart" of activations	0.50
11.13.17	Review email and attachments from client re print out of fire department reported VK457	0.50

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11.13.17	Review email and attachments from client re print out of activation list from 2/2017	0.50
11.13.17	Review email from client re pic of VK456 fusible link	0.15
11.13.17	Review email from client and analyze re Viking's response to Carnahan	0.50
11.13.17	Review email from client re motion to exclude crane and response	0.20
11.13.17	Review email from client re hearing on 11.14.17 and response	0.15
11.13.17	Review email from client re adding Robert Edgeworth as a witness to ECC Disclosure	0.15
11.13.17	Review motion, draft email, and review email chain between client, AMF and DSS re Viking's motion for a settlement conference	2.0
11.13.17	Review email and attachment from client re his review of the 18th ECC Supplement	0.25
11.13.17	Email to Crane Pomerantz with additional documents for his review	0.25
11.13.17	Review, Download & Save Notice of Deposition of Crane Pomerantz	0.30
11.13.17	Review, Download & Save Notice of Deposition of Brian Garelli	0.30
11.13.17	Review, Download & Save Notice of Deposition of Don Koch	0.30
11.13.17	Review, Download & Save Letter to Discovery Commissioner	0.30
11.13.17	Review, Download & Save Stipulation Regarding Motion in Limine Briefing Schedule	0.30
11.13.17	Review, Download & Save Letter to Hon. Tierra Jones	0.30
11.13.17	Review, Download & Save Letter Discovery Commissioner Bulla re Mtn SC	0.30
11.13.17	Review, Download & Save The Viking Corporation and Supply Network, Inc.'s Motion for Mandatory Settlement Conference and Stay Rulings on the Pending Motions and Request for Order Shortening Time	0.30
11.13.17	Review, Download & Save Letter to Discovery Commissioner Bulla DCRRs	0.30
11.14.17	Call with Client	0.15

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.

11.14.17	Review, Download & Save Commission to Take Out of State Deposition of Rene Stone	0.30
11.14.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition of Rene Stone	0.30
11.14.17	Review, Download & Save Commission to Take Out of State Deposition Harold Rodgers	0.30
11.14.17	Review, Download & Save Application for Issuance of Commission to Take Out of State Deposition Harold Rodgers	0.30
11.14.17	Review, Download & Save Plaintiff Edgeworth Family Trust and American Grating, LLC.'s 14 th Supplement to Early Case Conference Witness and Exhibit List	0.30
11.14.17	Review, Download & Save Subpoena Duces Tecum for the Custodian of Records of Rene Stone and Associates	0.30
11.14.17	Review, Download & Save Notice of Deposition of Custodian of Records for Rene Stone and Associates Duces Tecum	0.30
11.14.17	Email chain with Sheri Kern with process server in CA for Rene Stone SDT	0.25
11.14.17	Review email from client re Crane expert report typo	0.20
11.14.17	Email chain with client re K statues Parker was arguing for MSJ	1.0
11/14/17	Discussion with Rene Stone & Associates re: depositions in FSS/Thorpe litigation; Draft, serve and domesticate SDT in CA	1.0
11/14/17	Draft, compile and serve Plaintiffs' 14 th ECC Supplement	1.0
11/14/17	Prepare and Attend Hearing re: Motion to Strike Carnahan and MSJ Against Lange Plumbing	3.5
11/14/17	Pull documents for Contract attorney	0.5
11/14/17	Research contract issues brought up by Parker at hearing and Discussion with DSS	2.5
11/15/17	Draft Opposition to Pomerantz Motion	4.5
11/15/17	Revise SDT and California Court documents for domestication for Rene Stone & Associates	1.0
11/15/17	Discussion re case with DSS and BJM	0.50
11.15.17	Review email and links from client re K issues	0.50

INVOICE FOR ASHLEY M. FERREL
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11.15.17	Review email from client re Zurich list and Viking list and respond	0.25
11.15.17	Review email from client re calendar and respond explaining what everything is	0.50
11.15.17	Review email and link from client re Jeff Norton employment and SDT issues	0.30
11.15.17	Review email from client re evidentiary hearing questions and discuss with DSS	1.0
11.15.17	Review email from client re counsel in FSS/Thorpe case and respond	0.25
11.16.17	Email to Zamiski re outstanding bill and request for all evidence back	0.15
11.16.17	Review email and attachments from client re Zurich activations	0.50
11.16.17	Review email from client re privilege log and respond	0.25
11.16.17	Call with DSS	0.15
11.16.17	Review, Download & Save Plaintiffs' Opposition to Viking's Motion to Strike Untimely Disclosed Expert Crane Pomerantz on an Order Shortening Time and Counter Motion to Disclosure Crane Pomerantz as an Initial Expert	0.30
11.16.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc. dba Viking Supplynet's Opposition to Plaintiffs' Motion to Compel Viking Documents	0.30
11.16.17	Review, Download & Save Defendant The Viking Corporation's opposition to Plaintiff's Motion to Compel Documents and Respond to Discovery Regarding Financial Information	0.30
11.16.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s Confidentiality / privilege Log of Documents Subject to Stipulated Protective Order	0.30
11.16.17	Review, Download & Save Letter to D. Simon from J. Pancoast re Privilege Log	0.30
11/16/17	Finalize and Serve Opposition to Strike Pomerantz	1.5
11/16/17	Review Viking Privilege Log and documents and analyze Seattle Times case	2.75

INVOICE FOR ASHLEY M. FERREL
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11/16/17	Review Viking's Oppositions to Plaintiffs' Motions to Compel Financials and Compel Discovery Responses	0.75
11/16/17	Discussion with DSS and BJM re Lange claims	0.75
11/16/17	Prepare and pull documents for hearing on 11/17/17	1.0
11.16.17	Review email from DSS re finalized opp to Pomerantz motion and response	0.15
11.16.17	Review email from DSS to Ben Miller re response to bad faith acts of Lange	0.15
11.17.17	Review email from DSS to Susan McNicholas re re-noticing depo for UL	0.15
11.17.17	Review email and attachment from Evelyn Chun re Notice to vacate Olivas	0.15
11.17.17	Review and Respond to Jorie Yambao re Kevin Hastings final invoice	0.15
11.17.17	Review email from Susan McNicholas re UL deposition and documents	0.15
11.17.17	Email chain with Hastings re final bill and request for all evidence back	0.15
11.17.17	Review, Download & Save Lange Plumbing, LLC's 12 th Supplement to NRCP 16.1 Early Case Conference List of Witnesses and Documents	0.30
11.17.17	Review, Download & Save Lange Plumbing, LLC's Responses to Plaintiffs' 3 rd Set of Requests for Production	0.30
11.17.17	Review, Download & Save Lange plumbing, LLC's Answers to Plaintiffs' 3 rd Set of Interrogatories	0.30
11.17.17	Review, Download & Save Lange Plumbing, LLC 's Responses to Plaintiffs' 2 nd Set of Requests for Production	0.30
11.17.17	Review, Download & Save Lange Plumbing, LLC's Answers to Plaintiffs' 2 nd Set of Interrogatories	0.30
11.17.17	Review, Download & Save Subpoena Duces Tecum for 30(B)(6) of the Designees of Underwriters Laboratories	0.30
11.17.17	Review, Download & Save 2 nd Amended Notice of Video Deposition Duces Tecum Pursuant to NRCP 30(B)(6) of Designees of Underwriters laboratories, Inc.	0.30

INVOICE FOR ASHLEY M. FERREL
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11/17/17	Prepare and attend Hearing for Zurich motion for protective order, Viking Motion to Strike Pomerantz, Viking motion to Stay Enforcement of DCRR, Plaintiff Motion to Compel Financials, Plaintiff motion to Compel Discovery	3.0
11/17/17	Review Lange Plumbing's 12 th ECC Disclosure	0.25
11/17/17	Draft and serve amended deposition notice and subpoena for PMK of UL	0.50
11/20/17	Review Pancoast letter re meet and confer re MILs and draft response letter	0.50
11/20/17	Draft and send letter to Fred Knez re depositions of Rene Stone and Harold Rodgers	0.25
11.20.17	Email chain with DSS re outstanding expert bills	0.25
11.20.17	Email chain with DSS re meet and confer for MILS and hearing for Giberti's MGFS	0.25
11.20.17	Email chain with DSS re Knez letter and threat of motion to file protective order in CA for Rodgers and Rene Stone depositions	0.25
11.20.17	Review email from DSS to George Ogilvie re contract issues	0.15
11.20.17	Review and respond to email from Tracy Hunt re acceptance of Don Koch binder	0.15
11.20.17	Email chain with Mary Hayes re correspondence to and from Mr. Knez re Rogers and Rene Stone depo	0.50
11.20.17	Review and respond to email from Beth Molinar re outstanding invoice for Zamiski	0.15
11.20.17	Review email from client re K and forward to George	0.20
11.20.17	Email to Koch re send outstanding bill	0.15
11.20.17	Review, Download & Save Correspondence to Counsel regarding EDCR 2.47	0.30
11.20.17	Review, Download & Save Letter to Viking Counsel re Expert Depos 11.20.17	0.30
11.20.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
11.20.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30

INVOICE FOR ASHLEY M. FERREL
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11.20.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
11.22.17	Review, Download & Save Lange Plumbing, LLC's Supplemental Brief in Support of its Opposition to Plaintiff's Motion for Summary Judgment Against Lange Plumbing, LLC, Only and Countermotion Pursuant to EDCR 2.20	0.30
11.22.17	Review, Download & Save Notice of Vacating Video Deposition of the Custodian of Records for Rene Stone and Associates	0.30
11.22.17	Review, Download & Save Notice of Vacating Video Deposition of Harold Rodgers	0.30
11.22.17	Email to Mary Hayes re notice to vacated depositions of Harold Rogers and Rene Stone	0.15
11.22.17	Email documents for review to George Ogilvie	0.15
11/22/17	Draft and serve notice to vacate deposition of Rene Stone; Draft and serve notice to vacate deposition of Harold Rodgers	0.50
11.22.17	Review email from DSS re recent list of damages and response	0.15
11.22.17	Review email from DSS re sending Lange responses brief to Ogilvie and resps	0.15
11.27.17	Review email from DSS re Carnahan depo and response	0.15
11.27.17	Email chain with Rene Stone re vacating deposition	0.15
11.27.17	Email chain with Julie Lord (Dept. 10 clerk) re spellings for hearing transcript	0.25
11.27.17	Review email from Olivas re final billing	0.15
11.27.17	Review, Download & Save Notice of Vacating Video Deposition of Athanasia E. Dalacas, Esq. Duces Tecum	0.30
11.27.17	Review, Download & Save Notice of Deposition of Don Koch OFF Calendar	0.30
11.27.17	Review, Download & Save Notice of Deposition of Brian Garelli-Off Calendar	0.30
11.27.17	Review, Download & Save Notice of Deposition of Crane Pomerantz – Off Calendar	0.30

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11/27/17	Draft and serve notice to vacate deposition of Anthasia Dalacas	0.25
11/28/17	Draft and serve amended deposition notice and subpoena for Robert Carnahan	0.25
11/28/17	Review Letter from Lange and discussion with DSS	0.75
11.28.17	Review, Download & Save Subpoena Duces Tecum for Robert Carnahan PE	0.30
11.28.17	Review, Download & Save Amended Notice of Continued Video Deposition of Robert Carnahan P.E. Duces Tecum	0.30
11.29.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 19 th Supplemental NRCP 16.1 Disclosure	0.30
11.29.17	Review, Download & Save Correspondence to Counsel, dated November 29, 2017	0.30
11/29/17	Review Olgilvie response to Lange's Supplement to MSJ; Discussion with DSS re Reply	0.50
11.29.17	Review email from DSS re drafting reply to Lange's supplemental Opposition	1.50
11.29.17	Review email from DSS re drafting notice of attorney lien	0.15
11.29.17	Review email from DSS re letter from Pancoast to Simon	0.15
11.29.17	Email to Pancoast re hearing dates I front of DC Bulla in light of negotiations	0.15
11.30.17	Email to George Olgilvie instructing him to stop working on the case	0.15
11.30.17	Review, Download & Save Letter to Counsel	0.30
11.30.17	Review, Download & Save Correspondence to Discovery Commissioner Bulla regarding Hearings	0.30
11/30/17	Review Viking's 19 th ECC Supplement	1.0
11/30/17	Review Letter from Lange regarding discovery scheduling and discussion with DSS	0.75
11.30.17 & 12.2.17	Email chain with DSS re attorney lien	0.15
12/1/17	Draft Notice of Attorney Lien, serve and prepare & send all liens certified mail return receipt requested	2.5
12.1.17	Review, Download & Save Lange Plumbing Verification to Rogs	0.30

INVOICE FOR ASHLEY M. FERREL
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12.1.17	Review, Download & Save Notice of Attorney Lien	0.30
12/1/17	Review Release from Viking and discussion with DSS re release	0.50
12/4/17	Draft and serve notice to vacate deposition of UL Laboratories	0.25
12/4/17	Review Lange written discovery responses	1.5
12/4/17	Discussion with DSS re scheduling and status of case	0.40
12.4.17	Review, Download & Save Notice Vacating the 2 nd Amended Video Depo of NRCP30(b) (6) Designees of Underwriters Laboratories	0.30
12.4.17	Review, Download & Save Discovery Commissioners Report and Recommendations	0.30
12.5.17	Email chain with UL re vacating depo	0.15
12/6/17	Review Lange's 13 th ECC Disclosure	2.5
12.6.17	Review email from DSS re notice to vacate Caranahan depo	0.15
12/6/17	Draft and serve Notice to Vacate Robert Carnahan Deposition	0.50
12/6/17	TC with Judge Jones law clerk rehearing scheduling; Discussion with DSS	0.50
12.6.17	Review, Download & Save Service Only – Lange Plumbing 13 th Supp to NRCP 16.1 ECC	0.30
12.6.17	Review, Download & Save Service Only – Notice of Vacating the Continued Video Depo of Robert Carnahan	0.30
12.7.17	Review, Download & Save MDGF- Def The Viking Corporation & Supply Network MGF Settlement & Request for OST	0.30
12/8/17	Review Viking Motion for Good Faith Settlement, Analyze and discussion with DSS	0.75
12/8/17	Review Lange's 14 th and 15 th ECC Disclosure	0.50
12.8.17	Email chain with DSS re Order Granting Giberti MGFS	0.15
12/8/17	Review Stipulation to Dismiss from Viking and discussion with DSS	0.50
12.8.17	Review, Download & Save Lange Plumbing 15 th Supplement to 16.1 ECC List Witnesses and Docs	0.30

INVOICE FOR ASHLEY M. FERREL
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12.8.17	Review, Download & Save Lange Plumbing 14 th Supp to 16.1ECC List of Witnesses and Docs	0.30
12/11/17	Discussion with DSS re client's release of claims	0.20
12.11.17	Review email from DSS re Lange's 15 th ECC Supplement and response	0.25
12.11.17	Review email from DSS re Lange's 15 th ECC Supplement and response	0.25
12/12/17	Review Order granting Giberti Motion for Good Faith Settlement and discussion with DSS	0.25
12.12.17	Review, Download & Save Ltr. To Discovery Commissioner Bulla Re. Settlement	0.30
12.13.17	Review, Download & Save NEO Granting Third Party Def. Giberti Construction LLC Motion for Good Faith Settlement	0.30
1/2/18	Draft Notice of Amended Attorney Lien, serve and prepare & send all liens certified mail return receipt requested	1.5
TOTAL HOURS x \$275 per hour (reduced)		762.6
TOTAL FEES		\$209,715.00

INVOICE FOR BENJAMIN J. MILLER
EDGEWORTH v. LANGE, ET AL.

Date	Description	Time
8/16/17	Research and review prior cases and brief bank for written discovery on punitive damages	0.75
8/16/17	Send interoffice email regarding punitive damage discovery from other cases	0.25
8/17/17	Research and review licensing standards and regulations from California Board of Professional Engineers, Land Surveyors and Geologists for possible use in upcoming expert depositions	1.5
8/30/17	Send interoffice email regarding punitive damages written discovery from other cases	0.25
11/6/17	Draft email regarding case research for diminution in value damages to include in additional research for memoranda on admissibility	0.35
11/13/17	Draft interoffice email regarding summary of memo on admissibility of litigation conduct as bad faith at trial	0.30
11/16/17	Receipt and read interoffice email regarding instruction to prepare draft response regarding admissibility of litigation conduct as bad faith	0.25
11/16/17	Send response interoffice email confirming instruction to prepare draft response regarding admissibility of litigation conduct as bad faith	0.25
11/6/17	Research Nevada case law regarding cost of repair damages and diminution in value damages	0.75
11/6/17	Research case law of surrounding jurisdictions regarding cost of repair damages and diminution in value damages	1.5
11/6/17	Research various law review articles, restatements of law, jury instructions and other legal authorities regarding cost of repair damages and diminution in value damages	1.25
11/6/17	Draft email regarding case research for diminution in value damages to include in additional research for memoranda on admissibility	0.35

11/8/17	Prepare memo regarding cost of repair damages and diminution in value damages	2.0
11/9/17	Discussion with DSS re: Memo	0.5
11/13/17	Research Nevada law regarding admissibility of litigation conduct for bad faith	0.5
11/13/17	Research case law of surrounding jurisdictions regarding admissibility of litigation conduct for bad faith	3.25
11/13/17	Research various law review articles and other legal authorities regarding admissibility of litigation conduct for bad faith	1.75
11/13/17	Prepare memo regarding admissibility of litigation conduct for bad faith	1.75
11/13/17	Draft email regarding summary of memo on admissibility of litigation conduct as bad faith at trial	0.30
11/14/17	Research Contract Validity within NRS Chapter 624 and Nevada case law for summary judgment briefing	2.75
11/16/17	Confer regarding recoverable damages within breach of contract vs. products liability	0.75
11/16/17	Receipt and read interoffice email regarding instruction to prepare draft response regarding admissibility of litigation conduct as bad faith	0.25
11/16/17	Send response interoffice email confirming instruction to prepare draft response regarding admissibility of litigation conduct as bad faith	0.25
	Total Hours x's \$275 per hour (reduced)	21.8
	Total Fees	\$5,995.00

EXHIBIT 20

WA00371

INVOICE

EDGEWORTH V. LANGE, ET AL.

Description	Time
Initial Meeting with Client	1.75
Review file, Several discussions with Client	4.75
Demand letter to Defendant Lange	1.5
Representation Letters to Viking, Kinsale, Harris, Lange. Discussions with Client	4.25
Additional Letters to Defendants	1.5
Draft, Review, Revise, File and Serve Complaint and Amended Complaint, Affidavit of Service, Summons	6.75
Receive and Review Answers to Complaint	1.50
Prepare Early Case Conference, Stipulation to Amend Complaint, order from court and filing of same	2.25
Letter to Viking with Exhibits	3.25
Witness and Exhibit List, Redact and Prepare Privilege Log	7.50
8-19-16 prepare and file Request for Exemption from Arbitration, receive decision from court	.75
8/23/16 Inspection of Property, Meeting with Clients, Discussions with Client, Prepare and Serve Notice of Early Case Conference	3.75
9-27-16 ECC Conference with Lange Only	1.0
10-06-16 Conference Call with Expert Hasting	.25

10-07-16 Multiple Calls with Client, Ltrs and Emails with Def. Counsel, Fed ex Failed Head to Ivey Engineering, Prepare Affidavit of Chain of Custody	2.25
10-11-16 Receive, Review and Respond to Emails from Dalacas and Prepare and Send Letter to Dalacas, Phone Conference with Dalacas, Send Letters to Client and Dalacas Speak with Client	1.5
10-12-16 Receive and Review Dalacas Letter, Emails to Expert, Send Info to Client, Discussions with Client	1.0
10-13-16 Receive and Review Viking Emails, Response and Letter to Lange, Phone Call with Client, Rec New Emails from Dalacas Re: Inspection, Draft and Send Response to E-mails, Phone Call with Client	3.75
10-14-16 Rec/rev Dalacas Response, Forward to Client Rec /Review Emails and Attachments from Giberti, Print for File, Email Expert Re: Inspection, Email Viking, Review E-mails from Client	2.75
10-15-16 Discussions with Client, Ltr to Dalacas, Emails to Expert Re: Scheduling and Inspection	1.25
10-17-16 Review E-mails: Viking, Lange, Client: Prepare Responses, Discussions with Client	1.50
10-18-16 E-mail Exchanges Re: Inspection, Discussions with Client Meeting with Defense Counsel 2 nd Ecc with Lange and Viking	1.25
10-19-16 Site Inspection, Discussions with Client	3.5

10-21-16 Receive and Review Letters from Lange/dalacas Re: Replacement of Heads, Draft and Send Letter to Dalacas Re: Inspection and Separate Ltr Re: Coverage Issues Receive Emails from Dalacas, Phone Conference with Client, Receive and Review Viking Installation Guide	2.25
10-23-16 Email exchanges from Dalacas and prepare and send response re: Replacement of Heads	.15
10-24-16 Phone Call with Dalacas re Replacement of Heads, Discussions with Client Re: Replacement Email exchanges from Dalacas Confirming Agreements of Replacement Involving Lange, Rimkus and Procedures	1.25
11-1-16 Emails from Viking Re: Extension for Ecc Materials, Response	.25
11-4-16 Email Exchanges from Client, Dalacas	.50
11-10-16 Receive and Review Viking Ecc Witness and Exhibit Lists and Documents, Lange's First Supplement to Ecc Disclosures, Review and Finalize Plaintiffs New Ecc Witness and Exhibits and Serve Same on All Parties	2.25
11-13-16 Receive and Review Kinsale Ins. Letter. Denial of Additional Coverage, Forward to Client	.50
11-17-16 Email Exchanges	.50
11-18-16 Draft and Circulate Joint Case Conference Report	1.5
11-22-16 Review Emails from Viking Re: Exhibits, Receive and Review Third Party Complaint & Cross-claim, Forward to Client	.50
12-1-16/12-2-16 Email Exchanges with Client and Lange Re; Final Plans/inspection	.50
12-2-16 Receive and Review Lange Answer to Crossclaims	.50
Costs	\$3,982.45
Total Hours x's \$550 per hour (reduced)	70.15 hours

Total Fees	\$38,582.50
Total attorneys fees and costs thru 11-11-16	\$42,564.95

SIMON LAW
A PROFESSIONAL CORPORATION
810 SOUTH CASINO CENTER BOULEVARD
LAS VEGAS, NEVADA 89101

TELEPHONE (702) 364-1650

FACSIMILE (702) 364-1655

April 7, 2017

Brian Edgeworth
1191 Center Point Drive
Henderson, NV 89074

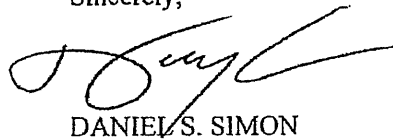
Re: Edgeworth Family Trust v. Lange Plumbing LLC et al.

Dear Mr. Edgeworth:

Enclosed please find the Invoice totaling \$46,620.69 for the period of 12-5-16 thru 4-4-17 with a copy of the Case Expense Summary showing costs.

If you have any questions or concerns regarding the foregoing please do not hesitate to contact my office.

Sincerely,



DANIEL S. SIMON

DSS/jan
enclosures

WA00376

INVOICE

EDGEWORTH V. LANGE, ET AL. (12-5-16 thru 4-04-17)

Description	Time
12-5-16 Email exchanges re: plans/final inspection, discussions with Dugan, emails	.50
12-13-16 - 12-16-16 Lange Billing, email exchanges, revise JCCR with Viking and send to all attorneys, client emails, discussion with expert Hastings re: billing & scope of work	1.75
1-4-17 - 1-9-17 draft, revise MSJ with exhibits, send to client for review, file & serve on Defendants	8.75
1-14-17 Revise JCCR - re-circulate, email, exchanges with lawyers, request mediation, advise client. Spoke to K. Hastings re: expert inspections, proposed plan, possible metallurgy engagement etc.	1.25
Review Opposition of Viking and Opposition of Lange to MSJ, meeting with Ashley Ferrel re: strategy and Reply and Discovery, Emails with Client, prepare Reply to MSJ, file and serve	6.25
1-20-17 draft Notices of Depositions & Subpoenas & serve Bernie Lange, Vince Dioro, Dustin Hamer, Tracy Garvey and Shelli Lange	2.5
1-23-17 Phone Call, Emails, Client Approval, Forward materials to Expert Zamiski	.75
1-24-17 Draft and Revise 30b6 deposition Notice and Subpoena and Serve	1.25
1-25-17 Research and analyze transferring case to business Court	.75

1-26-17 Review letter and Communication with Dalacas, reset depositions, prepare re-notices and Subpoenas, prepare objection to Viking Subpoenas to American Grating and Giberti and serve	1.25
2-9-17 Phone call with Pancoast re: MSJ, depositions and Subpoenas to American Grating & Giberti	.35
2-13-17 File review, prepare for depositions	2.25
2-13-17 Prepare & File Motion to Amend Complaint, Review Opposition, Prepare & File Reply	2.5
2-14-17 Deposition pre-conference with client, review file	3.25
2-15-17 Vince Dioro deposition 9:30am - 12:30pm	3.0
2-15-17 Notice of Deposition & Subpoena for Virginia Brooks, Jim Kreason, Re-Notice Deposition Bernie Lange, Shelli Lange, Vince Dioro (continuation), Dustin hamer	.75
2-22-17 Prepare and take Dustin Hamer's deposition	4.0
2-22-17 Re-notice Depositions for Vince Dioro, Shelli lange, Virginia Brooks, Jim Kreason and Serve	.50
2-28-17 - 3-1-17 meet client in Henderson, pick up file with Ms. Ferrel, review file, attend COR Depositions at Pancoast/Viking office in Summerlin. Meet with Pancoast at Simon Law downtown to review file for copying & production to Viking	2.25
3-7-17 Prepare and attend Motion for Summary Judgment and Motion to Amend Complaint: Dept 10	3.25
3-7-17 Prepare and File Motion for Summary Judgment as to Lange only	2.5

3-7-17 Prepare and Serve Offer of Judgment and Cover letter to Counsel	.75
3-8-17 Prepare and File Orders re: Motion for Summary Judgment and Motion to Amend Complaint, Prepare and File Amended Complaint, Notice of Entry of Orders	1.25
3-13-17 thru 3-15-17 Prepare and Take Depositions of Bernie Lange and Shelly Lange	6.5
3-20-17 Representation Letter to National Union Fire Ins. Co.	.75
3-21-17 Review Correspondence from Lange Requesting Motion for Summary Judgment (MSJ) be withdrawn; Review Kinsale Ins. File; Review Lange 4 th Supp to Ecc	1.25
3-23-17 Communication/emails with Defense Counsel Re: Stipulation to Continue MSJ Hearing, File and Serve	.50
3-24-17 Review Lange/kinsale Correspondence in Response to Offer of Judgment and Discovery with Client	.50
3-28-17 Notice of 30b6 Deposition and Subpoena and Serve	1.25
3-28-17 Review Written Discovery with Clients to Answer and Produce	1.25
4-4-17 Prepare and Serve 3 Day Notice of Intent to Take Default	.50
Costs	\$11,365.69
Total Hours x's \$550 per hour (reduced)	64.10 hours
Total Fees	\$35,255.00
Total attorneys fees and costs thru 4-4-17	\$46,620.69

Date: 04/07/2017

Case Expense Summary
Law Office of Daniel S. Simon

Page: 1

Case Range: 2016024.00 to 2016024.00
Date Range: 01/01/80 to 12/31/20
Employee Range: 0 to 999

Case No.: 2016024.00 Edgeworth Trust

Date	Emp	Amount	Description
06/15/16	DS	40.00	Reno/carson Messenger Services - service fee - ck# 21730
nm/dd/yy	DS	281.60	wiznet filing fee complaint
			Amount: \$ 3.50
			Court Fee: \$ 270.00
			Card Fee: \$ 8.10
07/05/16	DS	70.00	KC Investigations - service - ck# 21892
08/24/16	DS	3.50	wiznet filing fee Amended Complaint
09/02/16	DS	3.50	wiznet filing fee Acceptance of Service for viking
09/06/16	DS	3.50	wiznet filing fee Acceptance of Service
09/15/16	DS	2500.00	Ivey Engineering - retainer fee - ck# 22110
10/07/16	DS	47.39	fed-ex to kevin hastings at ivey engineering
11/17/16	DS	1032.96	Ivey Engineering, Inc. - inspection fee - ck# 22268
12/15/16	DS	1500.00	Ivey Engineering - retainer fee - ck # 22327
12/16/16	DS	3982.45	Costs paid from Edgeworth ck # 3571
01/11/17	DS	203.50	wiznet filing fee Plaintiffs Motion for Summary Judgment
01/30/17	DS	2500.00	Vollmer-Gray Engineering Laboratories - retainer fee - ck # 22420
02/13/17	DS	3.50	wiznet filing fee Plaintiffs Motion to Amend the Complaint on Order Shortening Time
nm/dd/yy	DS	3.50	wiznet filing fee Plaintiffs Motion to Amend the Complaint on Order Shortening Time
02/27/17	DS	3.50	wiznet filing fee Reply to Defendant Lange Plumbing, LLC's Limited Opposition to Plaintiffs' Motion to Amend the Complaint on Order Shortening Time
02/28/17	DS	3.50	wiznet filing fee Reply to All Defendants Opposition to Plaintiffs Motion for Summary Judgment
03/01/17	DS	307.75	copy charges for ecc production
			1231 x's .25 = 307.75
03/02/17	DS	1379.50	Oasis Reporting - Vincent Diorio Volume I transcript - ck # 22503
nm/dd/yy	DS	1107.85	Oasis Reporting - Dustin Hamer transcript - ck # 22504
03/07/17	DS	3.50	wiznet filing fee for Affidavit of Service for jim kreason
nm/dd/yy	DS	209.50	wiznet filing fee for Plaintiffs' Motion for Summary Judgment Against Lange Plumbing, LLC, Only

Amount:

Case Expense Summary
Law Office of Daniel S. Simon

Date	Emp	Amount	Description
			\$ 3.50
			Court Fee:
			\$ 200.00
			Card Fee:
			\$ 6.00
mm/dd/yy	DS	3.50	wiznet filing fee Second Amended Complaint
03/10/17	DS	146.00	KC Investigations - service - ck # 22529
mm/dd/yy	DS	445.00	Beck Video Prod - Dustin Hamer video depo - ck # 22527
mm/dd/yy	DS	537.50	Beck Video Prod - Vince Diorio Vol 1 - video depo - ck # 22528
mm/dd/yy	DS	131.00	KC Investigations - service - ck # 22533
03/16/17	DS	3.50	wiznet filing fee order denying msj
03/20/17	DS	3.50	wiznet filing fee NEOJ msj
03/21/17	DS	3.50	wiznet filing fee Order Granting Plaintiffs Motion to Amend the Complaint
03/22/17	DS	3.50	wiznet filing fee for NEOJ order granting mot to amd complaint
03/23/17	DS	215.00	Beck Video Prod - Shelli Lange Vol I video depo - ck # 22556
mm/dd/yy	DS	354.00	Beck Video Prod - Bernie Lange video depo - ck # 22555
mm/dd/yy	DS	256.99	Ivey Engineering - Coordination and prepare evidence - ck # 22552
04/03/17	DS	923.65	Oasis Reporting - Shelli Lange transcript - ck # 22584
mm/dd/yy	DS	1113.45	Oasis Reporting - Bernard Lange depo transcript - ck # 22575
Case Total:		11365.69	
Totals:		11365.69	

INVOICE SUMMARY

Edgeworth v. Lange and Viking

Attorneys Fees for Daniel Simon for period 4-5-17 thru 7-28-17	\$72,077.50
Attorneys Fees for Ashley Ferrel, Esq. for period 4-5-17 thru 7-25-17	\$38,060.00
Costs Outstanding thru 7-28-17	<u>\$31,943.70</u>
Total Due to Law Office of Daniel Simon	\$142,080.20

INVOICE

EDGEWORTH V. LANGE, ET AL. (4-5-17 thru 7-28-17)

Description	Time
4/7/17 Reviewed Viking First ECC Supplement	1.5
4/7/17 Reviewed Plaintiffs 5 th ECC Supplement	.5
4-18-17 Reply to opposition of Lange and Reply to Joinder by Viking to Plaintiffs MSJ against Lange only	3.75
4-21-17 thru 4-25-17 T/C to expert Zamiski, T/C with client, emails to Dalacas, Kinsale and Pancoast	.50
4-21-17 thur 4-24-17 Finalize Answers to written Discovery, Meet with Client: Responses to Lange Interrogatories, Request to Produce.	3.25
4-23-17 Prepare Viking Deposition Notices and serve	1.25
4-25-17 Review Viking Answer to Second Amended Complaint and Third Party Complaint against Giberti, discussions with client, forward to Kinsale Lawyers	.75
4-25-17 Prepare and attend hearing on MSJ against Lange only	3.5
4-27-17 Prepare and serve Interrogs and request for admissions to Viking	2.35
4-27-17 Review client emails, prepare and serve notices of deposition and Subpoena for Don Cadden	.50
4-28-17- 5-1-17 Prepare and file motion to compel NRCP 30b6 witness of Lange and sanctions	5.25
4-28-17 – 5-1-17 Prepare and file motion for order to show cause to hold Kreason in contempt	2.75

5-1-17 EDCR 2.34 conference with Dalacas re: Testing of Sprinkler Heads	.35
5-1-17 – 5-3-17 Review file and prepare for Viking 30 b 6 corporate designee depositions.	3.25
5-1-17 Prepare and serve Notice of Deposition of Dan Cadden	.75
5-1-17 Reviewed Viking's 2 nd ECC Supplement	.5
5-2-17 prepare and serve 30b6 notice of deposition and subpoena for Viking Supply Net	1.75
5-3-17 Take deposition of Viking NRCP 30b6 designee on 13 topics	5.0
5-4-17 Prepare and Serve ECC of American Grating to all Parties and Supplement Of Edgeworth to all parties	2.75
5-5-17 Reviewed and served Plaintiffs 6 th Supplement	1.5
5-5-17 Prepare and serve Request for Admissions, Interrogs and Request for Production of Documents on Lange	5.25
5-5-15 Prepare and serve Request to Produce to Viking	1.35
5-5-17 Review Kinsale determination letter re: Giberti, Review contract, Insurance Declaration Page and Prepare and serve response	.75
5-8-17 Prepare, circulate and file with court: Stipulation and order to continue Kreason hearing to same date as Motion to Compel Lange	.50
5-8-17 Receive and Review Langes Motion to compel testing	.50
5-10-17 Review Privilege Log and Proposed Protective Order	.75
5-11-17 Prepare and serve Notice of Deposition of Eric Johnson and James Mason	.75

5-1-17 Review and sign order and return to Dalacas	.35
5-11-17 Discussion with client re: coverages for Giberti	.50
5-12-17 Review Affidavit of Service Giberti Construction	.15
5-15-17 prepare and file opposition to motion to compel testing	2.75
5-17-17 Reviewed Vikings 4 th Supplement (Rimkus Docs)	4.5
5-18-17 Receive and Review Viking 4 th Supp, discovery T/C with J. Pancoast re: Protective Order, New Dates for 30(b)(6) witness dates and testing	.75
5-23-17 Review Rimkus File; Receive and Review Lange Opposition to Motion for Order to Show Cause	2.25
5-25-17 Review Viking Answer to Lange Amended Cross Claim; E-mails coordinate testing	.75
5-30-17 Receive and Review Stipulated Protective Order And Serve; Review Viking Responses to RFA	1.25
6-01-17 Review Lange Opposition to Motion to Compel and Sanctions and Discuss Plaintiff's Reply w/Atty Ferrel; Review and Finalize Reply to Lange's Limited Opposition to Motion for Order to Show Cause to Hold Kreason in Contempt; Reviewed Viking Supplynet objection to Notice of 30b6 Subpoena	1.75
6-03-17 Review Protective Order final revisions; review Viking responses to written discovery	1.25
6-04-17 to 6-06-17 Prepare and take Deposition of Dan Cadden	3.75
6-05-17 to 6-07-17 Review File, Prepare and Attend Hearing On Motion to Compel Lange	3.5

6-06-17 Prepare and Serve Notice of Inspection upon Land Viking Supplynet	.50
6-08-17 Review and revise Subpoena on City of Henderson Re; Inspection Reports	.75
6-13-17 Conf with Expert Hastings re: Travel/Inspection Discussions with Client; Review Giberti Answer and Cross-Claims against Viking	1.25
6-14-17 Review Lange's responses to written discovery ; discuss with Ashley Ferrel	2.0
6-15-17 Review Lange's 6 th Supp./Privilege Log; Review Commissioners Report and Recommendations, Revise; Review final protocol for testing/forward to experts	1.75
6-16-17 Review Stipulation and Order to extend Discovery Deadlines, prepare and send e-mail Response objecting to extension	.50
6-19-17 Discussion with Kreason re: Deposition dates and Motion for Contempt; prepare and serve new Amended notice of deposition for Kreason; Emails to counsel for Kreason deposition	.50
6-19-17-6-21-17 Prepare and Attend Deposition of Vince Diorio (2 nd deposition) on 6-21-17	5.25
6-22-17 Attend Testing (converse consultants); inspection Viking Supply Net	6.0
6-28-17 to 6-29-17 Prepare and take Deposition of Kyle Mao	2.5
6-28-17 to 6-29-17 Prepare and take deposition of Bernie Lange (as Lange 30(b)(6))	5.75
6-30-17 E-mails to Viking Counsel re: production of Documents EDCR 2.34 and Review file with AF	.75

6-30-17 Prepare and Attend Deposition of Vince Diorio (2nd deposition)	3.5
7-09-17 Review Viking production – Emails re: claims of other failures	2.50
7-09-17 to 7-10-17 Prepare and take deposition of Erik Johnson	4.5
7-10-17 Review and Revise opp to motion to continue trial and extend discovery and supplement to motion for sanctions	1.75
7-11-17 to 7-12-17 Prepare for Plaintiffs Motion For Sanctions and Attend Hearing	1.75
7-11-17 Review appraisal report from Acore consultants	.75
7-18-17 to 7-19-17 Review Protective Order and Viking Supplement; Revise Objection to Confidentiality and Serve	.50
7-19-17 to 7-21-17 Review Viking prior discovery responses and review and serve Notice of 2.34 conference; confirm with parties	1.50
7-21-19 2.34 conference with Pancoast re: 1. Plaintiff's objection to Confidentiality under the protective order. 2. Notice of Deposition of your Expert, Robert Carnehan, we could not agree. 3. Vikings supplemental answers specifically and the need for a verification.	.75
7-21-19 Review and revise DCCR re: sanctions, review letters and emails from Pancoast	.25
7-24-17 Spoke to Client; Reviewed case with Ashley Ferrel; Review emails from client; Discussions with client; review file	4.25
7/25/17 prepare and attend hearing on Motion to Extend Discovery	1.75

7/25/17 Discussions with Ashley Ferrel: Review and revise notice of Depositions: Rinkus, Zuric & Viking; Discussion with Client; review Vikings Supplemental Answers to Interrogatories, Letter from Pancoast	2.50
7-26-17 Discussions with client; Review files, emails; prepare and serve Request for Production and Interrogatories to Viking	1.75
7/28/17 Review Supplemental Joint Case Conference Report	.5
Costs	\$31,943.70
Total Hours x's \$550 per hour (reduced)	131.05
Total Fees	\$72,077.50
Total attorneys fees and costs thru 7-28-17	\$104,021.20

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(4-5-17 thru 7-25-17)

DATE	DESCRIPTION	TIME
4/7/17	Review Viking's First ECC Supplement	1.5
4/7/17	Prepared Plaintiffs 5 th ECC Supplement	0.5
4/8/17	Review Lange's Opposition to MSJ and make notes for Reply	0.5
4/11/17	Drafted & Filed Notice of Intent to Take Default on Lange Plumbing, LLC	0.5
4/13/17	Drafted and served 2 nd Amended Notice of Viking 30b6 Notice & SDT	0.5
4/17/17	Reviewed Viking Joinder to Lange's Opposition to Plaintiff's MSJ	0.5
4/17/17	Pulled cites and exhibits for Reply to MSJ	2.0
4/22/17	Drafted Written Discovery to Viking Corporation and SupplyNet for DSS review	5.75
4/27/17	Served Written Discovery on Viking entities	0.5
5/1/17	Review of Viking's 2 nd ECC Supplement	0.5
5/1/17	Drafted and Serve Plaintiffs' Motion for order to show cause and Compel James Kreason to Appear for Deposition	3.0
5/3/17	Attended Viking NRCP 30(b)(6) Deposition	5.0
5/5/17	Prepared and served Plaintiffs' 6 th ECC	1.5
5/5/17	Email to Sia re employees of Lange that Brandon refers to in deposition; Review deposition and cite transcript for Delucas	0.75
5/15/17	Drafted Opposition to Lange's Motion to Compel Sprinkler heads in Las Vegas for testing	3.5
5/17/17	Prepare and attend Hearing regarding Lange's Motion to Compel Sprinkler Heads and Testing with DC Bulla	3.5
5/17/17	Reviewed Viking's 4 th ECC Supplement (Rimkus Docs)	4.5
5/17/17	Drafted Letter to DC Bulla re: moving hearings	0.35
5/18/17	Reviewed Lange Plumbing's Limited Opposition to Motion to Compel Kreason	0.5
5/23/17	TC Erik Johnson re: scheudling depo	0.35
5/24/17	Collected and sent documents to expert (Hastings)	1.35
5/30/17	TC & email correspondence with Don Koch to discuss being climate expert in case	1.5
6/1/17	Reviewed SupplyNet's Objection to Subpoena for 30(b)(6) deposistion	0.5
6/1/17	Drafted Reply to Lang's Limited Opposition to Motion to Compel Kreason for DSS to review	2.75
6/1/17	Amended and served SupplyNet 30(b)(6) Deposition notice	0.35

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(4-5-17 thru 7-25-17)

6/2/17	Inspection at Edgeworth house with Viking weather expert	2.0
6/2/17	Reviewed Lange Opposition to Motion to Compel Deposition of Lange 30(b)(6) & for Sanctions	0.75
6/3/17	Reviewed Viking's responses to Plaintiffs' written discovery	1.5
6/5/17	Finalized and Served Reply to Lange's Opposition to Plaintiffs' Motion to Compel Depo of Lange 30(b)(6)	2.0
6/5/17	Reviewed and submitted changes to protective order for DSS to review	0.75
6/6/17	Discussion with all counsel re deposition dates for Johnson	0.5
6/7/17	Prepare and attend hearing- Motion to Compel the Deposition of Lange 30(b)(6) & Sanctions in front of Bulla	2.5
6/7/17	Attended Dan Cadden Deposition	1.75
6/8/17	Pulled information from assessors page for houses provided by client (used in COR to Henderson Building department	2.35
6/8/17	Reviewed and discussed testing protocol with DSS	0.5
6/9/17	TC Erik Johnson re: re-scheduling depo	0.35
6/9/17	Amended and served depo notice of Erik Johnson	0.35
6/9/17	Drafted and served deposition notice for Kyle Mao	0.5
6/9/17	Drafted and served Notice of Lange 2 nd NRCP 30(b)(6)	1.0
6/9/17	Drafted and served notice of COR for City of Henderson Building Department	1.0
6/10/17	Drafted DCRR for 6/7/17 hearing for DSS review	1.5
6/12/17	Drafted and served Amended notice of SupplyNet Warehouse Inspection	0.50
6/12/17	Reviewed Lange Plumbing's responses to written discovery; Discuss with DSS	2.5
6/13/17	Prepared for Vince Diorio continued deposition for DSS	2.5
6/13/17	Compiled and sent depositions to experts	0.75
6/14/17	Compiled all prior pleadings and depositions and drafted Letter to Nunez re: prior pleadings	2.5
6/14/17	Review Lange Plumbing's 6 th ECC Supplement	2.5
6/19/17	TC with Don Koch re: inspection	0.5
6/19/17	Reviewed documents provided by Pancoast prior to formal supplement and sent to our experts prior to inspection (material specifications and drawings)	1.25
6/20/17	Served Plaintiffs' response to Giberti's Request for Prior pleadings	0.35

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(4-5-17 thru 7-25-17)

6/20/17	Letter to DC Bulla to move hearings	0.35
6/20/17	Reviewed Viking's 5 th ECC Supplement	2.75
6/20/17	Reviewed Lange's 7 th ECC Supplement	0.75
6/20/17	Email correspondence with client re location of heads for destructive testing	0.5
6/22/17	Drafted and Served Amended NRCP 30(b)(6) Deposition Notice for Viking Supplynet	0.35
6/22/17	Destructive Testing	7.0
6/22/17	Site Inspection of Viking SupplyNet Warehouse	1.0
6/23/17	Reviewed and forwarded NestEnergy History to experts	0.5
6/26/17	Prepared documents for Kreason deposition	1.25
6/27/17	Attended Kreason Deposition	1.5
6/28/17	Reviewed depositions and documents in preparation for Kyle Mao deposition	2.0
6/28/17	TC with Diana from City of Henderson re COR deposition and document request	0.4
6/28/17	Reviewed Giberti's Motion to Extend Discovery	0.5
6/28/17	Reviewed Viking's Joinder to Giberti's Motion to Extend discovery	0.35
6/29/17	Attended Kyle Mao Deposition	2.5
6/29/17	Attended Bernie Lange NRCP 30(b)(6) deposition	3.0
6/30/17	Drafted and served notice of deposition for James Cameron	0.5
6/30/17	Drafted and served notice of deposition for Raul De La Rosa	0.5
6/30/17	Drafted and served notice of deposition for Robert Carnahan	0.5
7/6/17	Reviewed Viking's 6 th ECC Supplement (Emails, Analyses, Design Schematics)	4.0
7/7/17	Reviewed Vikings 6 th ECC Supplement (Emails, returns/complaints and created a summary)	4.5
7/7/17	Reviewed documents from the City of Henderson Building department and create summary chart for Viking production	3.0
7/10/17	Drafted Opposition to Giberti's Motion to Extend Discovery on OST	3.5
7/10/17	Attended part of Deposition of Erik Johnson	2.0
7/11/17	Drafted Opposition to Giberti's Motion to extend discovery for DSS review	2.5
7/11/17	Drafted and finalized supplement to Motion to compel and request for sanctions	2.35
7/11/17	Amended and served amended notice deposition of Robert Carnahan	0.35

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(4-5-17 thru 7-25-17)

7/12/17	Attended Status Check w/ Bulla re: attorney's fees	1.5
7/12/17	Compiled and served Plaintiffs 7 th ECC Supplement	1.35
7/13/17	Picked up sprinklers at Converse Consulting, took to Fed-Ex and Shipped to Vollmer Gray Labs	1.75
7/13/17	Drafted Affidavit for Chain of Custody of Sprinklers	0.5
7/13/17	Drafted Objection to Confidentiality of Viking Document Production for DSS to review	1.5
7/14/17	Drafted and filed 2 nd Supplement to Plaintiffs' Motion to Compel (fees for 2 nd 30b6 Lange depo)	1.0
7/14/17	TC with Sia re: sanctions	0.35
7/17/17	Letter to Sia re: sanctions and Rule 11 motion; emails resolving amount of sanctions	0.5
7/17/17	Review Giberti's Motion to Continue Discovery deadlines in front of District Court Judge -	0.5
7/17/17	Drafted and served Opposition to Giberti's 2 nd Motion to Extend discovery deadlines	0.5
7/17/17	Reviewed Viking's Supplemental Responses to Plaintiffs' Interrogatories	0.75
7/18/17	Drafted 2.34 Notice of 2.34 conference with Viking Defendants for deficient discovery responses for DSS to review	0.5
7/25/17	Discussions with DSS and client; draft Notice of Depositions for DSS to review; Rimkus; Zuric and Amended Notice of Viking deposition	3.25
7/25/17	Attend hearing on Motion to Extend Discovery in Dept 10	1.25
TOTAL HOURS x \$275 per hour (reduced)		138.4
TOTAL FEES		\$38,060.00

INVOICE SUMMARY

Edgeworth v. Lange and Viking

Attorneys Fees for Daniel Simon for period 7-31-17 thru 9-19-17	\$119,762.50
Attorneys Fees for Ashley Ferrel, Esq. for period 7-31-17 thru 9-19-17	\$60,981.25
Attorneys Fees for Benjamin J. Miller, Esq. for period 8-16-17 thru 9-15-17	\$2,887.50
Costs Outstanding thru 9-19-17	<u>\$71,555.00</u>
Total Due to Law Office of Daniel Simon	\$255,186.25

INVOICE FOR DANIEL S. SIMON

**EDGEWORTH V. LANGE, ET AL.
(7-31-17 thru 9-19-17)**

Date	Description	Time
8-2-17	Telephone Conference with Pancoast 2.34 Viking Production, Review Viking 7 th Supp ECC, Review File and Draft Motion to Compel, Discussions with Client, Review Letter from Pancoast Dated 8-1-17 Re: Subpoenas	5.75
8-3-17	Draft Opposition to Motion for Protective Order	4.25
8-4-17	Revise Motion to Compel and Opposition to Motion for Protective Order; Review 6 th & 7 th Viking Supp	6.25
8/7/17	Review File with Client and AF, Revise Motion to Compel. Disc. with Fred Knez; Review 6 th & 7 th Viking Supp	6.75
8-8-17	Review File, Multiple Discussions with Client and AF, Expert Zamiski Revise Motion to Compel	6.25
8-9-17	Travel to San Diego and Back to LV; Discuss Case with Ivey Engineering.	8.0
8-10-17	Revise Motion to Compel and Opposition to Viking Motion for Protective Order, Review File, Discussions with Client and AF; Review 6 th & 7 th Viking Supp	6.25
8-11-17	Review and Revise Designation of Experts and Reports, Discussions with Hastings and Client, Review E-mails Draft Discovery Requests	5.25
8-12-17	Revise Opp to Motion for Protective Order and Motion to Compel	3.50
8-13-17	Review and Revise Notice of Depositions and Inspection for Lansing, Mi; Review 6 th , 7 th , 8 th & 9th Viking Supp	3.75
8-14-17	Review File, Revise Mot to Compel	4.5
8-14-17	Review and Revise Designation of Experts	1.75
8-14-17	Telephone Conference with Peter Poland, Esq. Re: 2.34 Conference/Rimkus Subpoena	.5
8-14-17	Review and Revise Motion to Amend Complaint	1.25
8-14-17	Review File, Emails, Review Revise Written Discovery	1.75
8-15-17	Review and Revise Notice of Depositions; Review 6 th , 7 th , 8 th & 9th Viking Supp	2.25

8-15-17	Review Defendants Expert Designations/reports; Review 6 th , 7 th , 8 th & 9 th Viking Supp	3.75
8-15-17	Review File, Revise and Finalize Motion to Compel and Opposition to Motion for Protective Order	2.75
8-15-17	Review Letter from Viking Re: Violation of Protective Order, Discuss with AF	.5
8-15-17	Discussion with Client Re: Expert Reports	.5
8-15-17	Discussion with AF Re: Experts - Witnesses	.5
8-15-17	Discussion with Don Koch; Review 6 th , 7 th , 8 th & 9 th , Viking Supp	3.25
8-15-17	Discussion with Client and AF	1.75
8-15-17	Draft Motion to Compel Rimkus	2.25
8-16-17	Discussions with Client and AF	2.25
8-21-17	Finalize Reply to Opp to Motion to Compel; Client Emails, Pancoast Emails; Discussions with Client and AF; Review File	6.75
8-22-17	Review File with AF; Call Several Witnesses/lawyers; Review Req for Production No. 4; Prepare for Hearing on 8-23-17	2.75
8-23-17	Attend Hearing on All Discovery Matters	4.0
8-24-17	Meet with Expert Pomerantz; Review 6 th , 7 th , 8 th , 9 th , 10 th , 11 th & 12 th Viking Supp	4.25
8-25-17	Review and Revise Deposition Notices and Subpoenas for Tyco and Reliable; Review 6 th , 7 th , 8 th , 9 th , 10 th , 11 th & 12 th Viking Supp	3.25
8-28-17	Martorano Deposition Prep	4.0
8-29-17	Meet with Giberti and Nunez; Discussion with Client	1.5
8-29-17	Discussion with AF; Review Expert Binder; Disc. FSS Court Docket	.75
8-30-17	Depo Prep for Mortorano (9:30-4:00); Discussion with Hastings, Zamiski and Client	7.5
8-30-17	Depo Prep Continued for Mortorano	1.5
8-31-17	Depo Prep Continued for Mortorano	2.0
8-31-17	Take Depo of Mortorano	8.0
9-1-17	Discussions with Zamiski / AF strategy; pull hot docs for experts	1.75
9-4-17	Review and Revise UL 30b6 Notice; Review File	3.25

9-5-17	Discussions with Michael Bartlett, atty for Zurich re: 2.34 got Notice of Depo/Subpoena	.50
9-5-17	Review File with AF; Gather Carnahan exhibits; Review File	2.25
9-6-17	Depo Prep	5.0
9-6-17	Depo Prep and travel time for carnahan depo	6.0
9-7-17	depo prep and carnahan depo	10.00
9-8-17	File Review, Discussion with Client, Review and Revise NRCP 30b6 Depo Notice of UL, Review and Revise Motion to Exclude Rosenthal	5.25
9-9-17	Review and Revise NRCP 30b6 Depo Notice of Viking Group, Draft Request for Admissions to Viking (4 th Set); Review and Revise Interrogatories and Request for Production to Viking (4 th Set); Revise MIL to Exclude Rosenthal	5.25
9-10-17	Revise MIL to Exclude Rosenthal	3.75
9-11-17	Conference Call with Zamiski; Discussion with Client; Af; Pre-depo with Angela Edgeworth; Call with K. Hastings; File Review	4.75
9-12-17	Finalized All Discovery to Defendants Viking; Opposition to Vikings Emergency Motion to Compel; Reply to Defendants Opposition to Plaintiffs Motion to Amend to Add Viking Group	5.25
9-13-17	Prepare and Attend Hearing on Defendants Motion to Compel; Discuss with Client and Expert Koch; Review Pancoast Letter Re: Viking Never Tested; Revise MIL to Exclude Rosenthal; Discuss with AF	6.25
9-14-17	Meeting with Brian Gorelli and Crane Panerantz and Travel Time; Review and Revise Reply to Non-party Rimkus Opposition to Plaintiffs Motion to Compel	4.75
9-15-17	File Review	4.25
9-15-17 thru 9-17-17	Discussion with Hastings, Client and AF; Revise Motion to Compel Carnahan; Emails	3.5
9-18-17	Review and Revise Rebuttal Expert Designation; Revise MIL to Exclude Rosenthal and Motion to Compel Carnahan; Attend Angela Edgeworths Deposition	7.25
9-19-17	Prepare and Attend Motion to Amend to Add Viking Group	2.0
9-19-17	Revise and Finalize Motion to Compel Carnahan and Rosenthal	2.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(7-31-17 thru 9-19-17)

DATE	DESCRIPTION	TIME
8/7/17	Review file with DSS and met with client	6.25
8/7/17	Review Notice from Discovery Commissioner re: DCRR from 7/12/17	1.5
8/8/17	Review file and discussions with DSS and client	6.0
8/8/17	Review Viking's Motion for Protective Order No. 2	0.5
8/8/17	Review Viking's 7 th Supp	2.0
8/9/17	Draft Motion to Amend Complaint and Draft proposed amended complaint	5.0
8/9/17	Review Viking's 7 th Supp	4.5
8/10/17	Discussions with DSS and client	2.5
8/10/17	Review Viking's 7 th and 8 th Supp	5.5
8/11/17	Draft Designation of Experts and Reports	0.5
8/11/17	Review Viking's 9 th Supplemental Disclosure	2.75
8/11/17	Review of file and draft notices of deposition for Viking employees and Notice of Inspection	2.0
8/12/17	Revise Opposition to Motion for Protective Order	2.25
8/12/17	Drafted Plaintiffs' 8 th ECC Supplement	1.0
8/14/17	Draft and serve re-notice of COR for Rimkus Consulting; drafted email and sent via email and fax to Peter Polland	0.5
8/14/17	Review 7 th and 8 th Viking ECC Supplements	3.25
8/14/17	Drafted Written Discovery to Viking Corporation and SupplyNet for DSS review	2.0
8/14/17	Finalized and served Plaintiffs' 3 rd Set for Rogs, 3 rd Set of RFPs, and 2 nd set of RFAs	0.75
8/14/17	Finalized and serve Plaintiffs' Expert Disclosure	0.5
8/15/17	Review letter from Viking re: violation of protective order and discuss with DSS	0.5
8/15/17	Review Viking, Lange and Giberti's designation of expert witnesses and reports	2.5
8/15/17	Discuss expert witnesses with DSS	2.25
8/15/17	Finalized and served Plaintiffs Opposition to Motion for Protective Order	1.5
8/15/17	Served Notice of Deposition and SDT on Viking employees in Michigan and Notice of Inspection	1.5
8/16/17	Review Lange's 9 th Supplemental ECC Disclosure	0.5
8/16/17	Revise Motion to compel Rimkus	2.0
8/16/17	Discussions with DSS and client	2.25
8/16/17	Review Viking's 10 th ECC Supplement	1.5
8/16/17	Served Plaintiffs' 8 th ECC Supplement	0.25
8/17/17	Finalized and served Plaintiffs' Motion to Compel Viking	6.25
8/18/17	Review Viking's 11 th and 12 th ECC Supplement	3.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(7-31-17 thru 9-19-17)

8/18/17	Review Viking's Reply to Motion for Protective Order No.1 & No. 2	1.0
8/18/17	Finalize and Serve Plaintiffs' Motion to Compel Rimkus Consulting	1.25
8/19/17	Review Viking's Opposition to Plaintiffs' Motion to Compel	0.25
8/19/17	Draft reply to Motion to Compel	5.5
8/21/17	Finalize and serve Plaintiffs' Reply to Viking's Opposition for the Motion to Compel Viking	1.5
8/21/17	Review file, discussions with DSS and client	3.0
8/21/17	Revise and finalize the 7-12-17 DCRR; send follow up emails to all counsel for review and signature	2.25
8/22/17	Review of file with DSS; called several witnesses/lawyers from emails produced by Viking; Prepare for hearing with Bulla	4.0
8/22/17	Finalize and serve Plaintiffs 4 th set of RFPs to Viking	0.5
8/23/17	Attend Hearing on Motion to Compel and Viking's 2 Motions for Protective Orders	4.0
8/24/17	Review file and compile information for expert Pomerantz	1.5
8/24/17	Draft and serve Plaintiffs' 3 rd set of RFAs to Viking	0.5
8/25/17	Draft deposition notices and SDT for NRCP 30(b)(6) of Reliable and Tyco	2.0
8/25/17	Review Fraud Binder, scan and create table of contents	1.5
8/27/17	Review file for computation of damages	3.5
8/28/17	Martorano Deposition Prep	4.0
8/28/17	Reviewed Viking's Responses to 2 nd RFP and 2 nd Rogs	0.5
8/29/17	Discussions with DSS re Martorano Depo and prep	0.75
8/29/17	Draft Harold Rodgers Depo Notice and SDT	0.5
8/29/17	Research FSS & Thorpe dockets and pull documents	5.0
8/30/17	Depo Prep for Martorano	5.0
8/30/17	Review file for UL documents produced by Viking and draft Notice of NRCP 30(b)(6) of UL	3.0
8/30/17	Review Vikings' Second Supplemental Responses to plaintiffs' Second Set of Rogs and RFPs; Review Viking's NRCP 45 objection to the SupplyNet SDT	1.0
8/31/17	Attend Martorano Deposition	8.0
9/1/17	Discussions with DSS re strategy and pull hot docs for experts	5.0
9/1/17	Phone Conference with Michael Bartlett re: Zurich Subpoena	0.75
9/1/17	Review Viking's Motion to Associate Counsel re: Kenton Robinson and Jay McConnell	0.50

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(7-31-17 thru 9-19-17)

9/1/17	Finalize and Serve Deposition Notice, SDT, Application and Comm to Take Out of State Depo	0.5
9/5/17	Draft and Finalize Limited Opposition to Viking's Motion to Associate Counsel	0.5
9/5/17	Phone Conference with Michael Bartlett re: subpoena and notice for Zurich Insurance Company	0.5
9/5/17	Finalize and serve amended notice of Depo for Zurich American Insurance Company, SDT, send via email and also send out to process server	0.5
9/5/17	Review Viking's Opposition to Plaintiffs' Motion to Amend	1.0
9/5/17	Draft and serve Plaintiffs' 9 th ECC Supplement	1.5
9/5/17	Prepare for Carnahan Depo	3.0
9/6/17	Review DCRR from the 8/23/17 Hearing; Listen to audio of 8/23/17 hearing; send revisions of DCRR to Pancoast	3.5
9/6/17	Prepare for Carnahan Depo	2.75
9/6/17	Review Non-Party Rimkus' Opposition to Plaintiffs' Motion to Compel	0.5
9/6/17	TC with Janet re: 2.34 of inspection of home and ECC production organization	0.5
9/7/17	Review Carnahan documents produced on morning of his deposition from Viking	1.5
9/7/17	Attended Carnahan Deposition telephonically	4.5
9/8/17	Revise Notices for Viking employees and Notice of Inspection of Viking	1.0
9/8/17	Draft 4 th set of RFPs and Rogs to Viking	1.75
9/8/17	Review revised DCRR from 8/23/17 hearing and discussion with Janet re: additional changes	0.5
9/8/17	Revise UL Notice and SDT	0.5
9/8/17	Draft Motion to Strike Viking's Answer	3.5
9/9/17	Researched cases cited by Defendants and Drafted Reply to Motion to Amend Complaint	3.5
9/11/17	Revised and finalized Reply to Motion to Amend Complaint to Add Viking Group	3.0
9/11/17	Met with DSS and client regarding file	1.5
9/11/17	Review revised DCRR from 8/23/17 hearing and send email to Janet regarding additional revisions	1.5
9/11/17	Review ECC Supplements by all parties to identify Giberti job file	1.0
9/12/17	Drafted and served Plaintiffs' Opposition to Viking's Emergency Motion to Compel Home Inspection	5.0
9/12/17	Drafted Reply to Non-Party Rimkus' Motion for Protective Order	3.25

INVOICE FOR ASHLEY M. FERREL
EDGEWORTH v. LANGE PLUMBING, ET AL.
(7-31-17 thru 9-19-17)

9/13/17	Prepare and Attend Hearing on Defendants' Motion to Compel Home Inspection; Review Panocast letter re: UL and discuss with DSS	6.25
9/13/17	Finalized and served NRCP 30(b)(6) Notice of Reliable, Tyco, Viking Group, UL, Amended Notice of Harold Rodgers, Amended Notices and SDT of Viking employees in Michigan and amended notice of inspection	2.5
9/14/17	Discussions with DSS and experts	2.0
9/14/17	Finalize and serve Plaintiffs' Reply to Non-Party Rimkus' Opposition to Plaintiffs' motion to Compel	2.75
9/15/17	Review Viking's Responses to Plaintiffs' 2 nd Set of RFAs, 3 rd set of RFPs, and 3 rd set of Rogs	1.0
9/15/17	Draft Rebuttal Expert Disclosure and get disclosure documents from experts	1.0
9/15/17	Serve Notice of Telephonic 2.34 Conference with Viking re written discovery deficiencies	0.25
9/15/17	Review 2 nd half of Carnahan deposition (in rough)	2.0
9/15/17	Met with Tyler Ure to go over Giberti/American Grating file at Simon Las	0.5
9/15/17	Draft Notice of Deposition and SDT for Nate Wittasek	0.5
9/17/17	Reviewed and revised Motion to Compel Carnahan; responded to client and DSS emails	4.0
9/18/17	Reviewed and revised Motion to Compel Carnahan	3.25
9/18/17	Reviewed and revised MIL to Exclude Rosenthal	1.5
9/18/17	Revised and served Rebuttal Expert Disclosure	1.25
9/18/17	Reviewed DC Transcript from 8/23/17	0.5
9/19/17	Prepared and attended hearing for Motion to Amend Complaint to Add Viking Group, Inc.	1.5
9/19/17	Draft and serve notice to vacate deposition of James Cameron	0.25
9/19/17	TC with Fred Kenez re: protective order in FSS and Thorpe litigation; TC with Robinson re: 2.34 of insufficient discovery responses; TC with Michael Bartlett and Sinnott re: Motion to Compel Zurich; Discussion re: Motion to Compel with DSS	1.5
9/19/17	Finalized and sent Motion to Compel Carnahan over to for OST signature	1.5
9/19/17	Finalized and sent MIL to Exclude Rosenthal over to Judge Jones for OST signature	1.25
TOTAL HOURS x \$275 per hour (reduced)		221.75
TOTAL FEES		\$60,981.25

INVOICE FOR BENJAMIN J. MILLER

EDGEWORTH V. LANGE, ET AL.
(8-16-17 thru 9-15-17)

Date	Description	Time
8/16/17	Legal Research of Damages Recoverable under Breach of Contract and Products Liability, Including Economic Loss, Doctrine and Consequential Damages	1.5
8/16/17	Draft Jury Instructions on Product Liability Claims	1.5
8/16/17	Draft Jury Instructions on Breach of Contract Claims	2.0
8-16-17	Draft Jury Instructions on Property Damage Claims	.5
8-16-17	Draft Jury Instructions on Punitive Damage Claims	1.5
8-16-17	Draft General Jury Instructions	.5
9-14-17	MIL draft to Exclude Expert Rosenthal	3.0
	Total Hours x's \$275 per hour (reduced)	10.5
	Total Fees	\$2,887.50
	Total attorneys fees and costs thru 9-15-17	\$2,887.50

EXHIBIT 21

WA00403



MEMO
DANIEL S. SIMON, ESQ.
Nevada Bar No. 4750
ASHLEY M. FERREL, ESQ
Nevada Bar No. 12207
SIMON LAW
810 South Casino Center Boulevard
Las Vegas, Nevada 89101
(702)364-1650
lawyers@simonlawlv.com
Attorneys for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

EDGEWORTH FAMILY TRUST, and)
AMERICAN GRATING, LLC)
Plaintiffs,)
vs.)
LANGE PLUMBING, L.L.C.;)
THE VIKING CORPORATION,)
a Michigan corporation;)
SUPPLY NETWORK, INC., dba VIKING)
SUPPLYNET, a Michigan corporation;)
and DOES I through V and ROE)
CORPORATIONS VI through X, inclusive,)
Defendants.)

CASE NO.: A-16-738444-C
DEPT. NO.: X

PLAINTIFFS' MEMORANDUM OF OUTSTANDING COSTS AND DISBURSEMENTS

Clerks Fees:

Wiznet Filing Fees	72.00
Hearing Transcript Fees	1,654.67
Process Serving Fees	1,396.30
Total	\$3,122.97

Video and Court Reporters' Fees:

Angela Edgeworth Deposition Transcript	958.50
Raul DeLa Rosa Deposition Fee & Video	911.35
Robert Carnahan Deposition Transcript	4,364.90

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810 S. Casino Center Blvd.
Las Vegas, Nevada 89101
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1	Colin Kendrick Deposition Transcript	308.70
2	Mark Giberti Deposition Transcript	1,246.35
3	Brian Edgeworth Deposition Transcript	1,215.55
4	Zurich Insurance Non-Appearance Transcript	335.55
5	Margaret Ho Deposition Transcript	235.00
6	Total:	9,575.90
7	Expert Witness Fees:	
8	Sklar Williams Expert Fees (Pomerantz)	19,270.00
9	Ivey Engineering Expert Fees (Hastings)	10,958.56
10	Vollmer-Grey Expert Fees (Zamiski)	20,105.00
11	A-CORE Consultants Expert Fees (Olivas)	2,250.00
12	McDonald Carano Expert Fees (pending refund)	5,062.50
13	Total:	57,646.06
14	Copy fees:	
15	Copies for Motions on OST	
16	and Mediation Brief (5,000 pgs X .25)	1,250.00
17	Total:	1,250.00
18		
19	TOTAL COSTS:	\$71,594.93
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810 S. Casino Center Blvd.
Las Vegas, Nevada 89101
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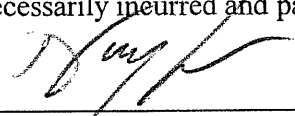
STATE OF NEVADA)

) ss.:

COUNTY OF CLARK)

DANIEL S. SIMON, ESQ., being first duly sworn, deposes and says as follows:

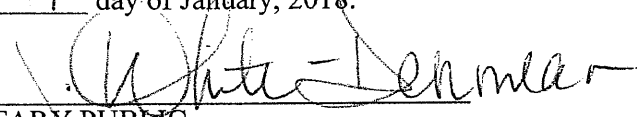
That affiant is the attorney for the Plaintiffs in the above-entitled matter and has personal knowledge of the above costs and disbursements expended; that the items contained in the above memorandum of outstanding costs are true and correct to the best of this affiant's knowledge and belief; and that the said disbursements have been necessarily incurred and paid in this action.



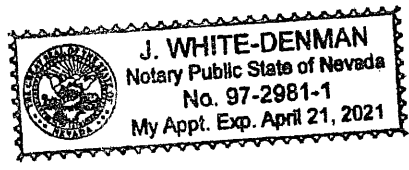
DANIEL S. SIMON

SUBSCRIBED AND SWORN to before me

this 17th day of January, 2018.



NOTARY PUBLIC

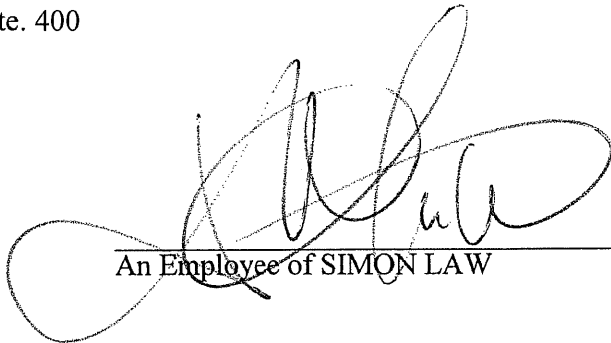


SIMON LAW
810 S. Casino Center Blvd.
Las Vegas, Nevada 89101
702-364-1650 Fax: 702-364-1655

CERTIFICATE OF E-MAIL & U.S. MAIL

I hereby certify that on this 17th day of January, 2018, I served a copy, via electronic mail and Certified Mail, Return Receipt Requested, of the foregoing **PLAINTIFFS' MEMORANDUM OF OUTSTANDING COSTS AND DISBURSEMENTS** on all interested parties by placing same in a sealed envelope, with first class postage fully prepaid thereon, and depositing in the U. S. Mail, addressed as follows:

Robert Vannah, Esq.
VANNAH & VANNAH
400 South Seventh Street, Ste. 400
Las Vegas, NV 89101
rvannah@vannahlaw.com



An Employee of SIMON LAW

Jen

From: Ashley Ferrel
Sent: Monday, August 28, 2017 4:25 PM
To: Jen
Subject: FW: Receipt of Order

Please add to Edgeworth costs

-----Original Message-----

From: courtweb1@riverside.courts.ca.gov [<mailto:courtweb1@riverside.courts.ca.gov>]
Sent: Monday, August 28, 2017 4:24 PM
To: Ashley Ferrel
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 657477.
Order Date: 08/28/2017
Name: Simon Law

Document(s):

Case RIC1504932 HEARING RE: MOTION T (20pgs)

Total Paid: \$1.00
Method of Payment: American Express*****1039

=====

This message was sent by an automatic mailer, please do not reply.

Jen

From: Ashley Ferrel
Sent: Monday, August 28, 2017 4:25 PM
To: Jen
Subject: FW: Receipt of Order

Please add to Edgeworth costs

-----Original Message-----

From: courtweb1@riverside.courts.ca.gov [<mailto:courtweb1@riverside.courts.ca.gov>]
Sent: Monday, August 28, 2017 4:27 PM
To: Ashley Ferrel
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 657478.
Order Date: 08/28/2017
Name: Simon Law

Document(s):

Case RIC1504932 MEMO OF POINTS & AUT (11pgs)

Total Paid: \$8.00
Method of Payment: American Express*****1039

=====

This message was sent by an automatic mailer, please do not reply.

Janelle

From: efilimgmail@tylerhost.net
Sent: Tuesday, September 05, 2017 12:52 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1447493

Filing Submitted

Envelope Number: 1447493

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/5/2017 12:51 PM PST
Filing Type	Opposition - OPPS
Filing Description	Plaintiffs' Limited Opposition to Viking's Motions to Associate Counsel on an Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1447493

Document Details	
Document Title	Limited Opp to Motion to Associate Counsel.pdf
Lead Document Page Count	2
Lead Document	Download Document
This link is active for 45 days.	

WA00410

Jen

From: Ashley Ferrel
Sent: Monday, September 11, 2017 3:59 PM
To: Jen
Subject: FW: Receipt of Order

Edgeworth Cost

-----Original Message-----

From: courtweb1@riverside.courts.ca.gov [<mailto:courtweb1@riverside.courts.ca.gov>]
Sent: Monday, September 11, 2017 4:03 PM
To: Ashley Ferrel
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 659139.
Order Date: 09/11/2017
Name: Simon Law

Document(s):

Case RIC1504932 ANSWER TO 2ND AMENDE (7pgs)

Total Paid: \$6.00
Method of Payment: American Express*****1039

=====

This message was sent by an automatic mailer, please do not reply.

Janelle

From: efilingmail@tylerhost.net
Sent: Wednesday, September 20, 2017 4:30 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1523084

Filing Submitted

Envelope Number: 1523084

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/20/2017 4:15 PM PST
Filing Type	Motion - MOT
Filing Description	Plaintiffs' Motion to Compel Testimony and Evidence of Defendants, the Viking Corporation & Supply Network, Inc. Dba Viking Supplynet's Expert, Robert Carnahan, or in the Alternative, Strike Robert Carnahan as an Expert on Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1523084

Document Details	
Document Title	doc00244620170920160917.pdf
Lead Document Page Count	89
Lead Document	Download Document

WA00412

Janelle

From: efilngmail@tylerhost.net
Sent: Thursday, September 21, 2017 4:09 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1528936

Filing Submitted

Envelope Number: 1528936

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/21/2017 4:05 PM PST
Filing Type	Motion - MOT
Filing Description	Plaintiffs Motion in Limine to Exclude Defendants The Viking Corporation & Supply Network, Inc. dba Viking Supplynet's Expert Jay Rosenthal on Order SHortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1528936

Document Details	
Document Title	doc00252920170921155108.pdf
Lead Document Page Count	279
Lead Document	Download Document
This link is active for 45 days.	

WA00413

Janelle

From: efilimgmail@tylerhost.net
Sent: Friday, September 22, 2017 10:15 AM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1531269

Filing Submitted

Envelope Number: 1531269

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,

Plaintiff(s)vs.Lange Plumbing, L.L.C.,

Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/22/2017 10:13 AM PST
Filing Type	Receipt of Copy - ROC
Filing Description	Receipt of Copy
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1531269

Document Details	
Document Title	doc00254420170922100633.pdf
Lead Document Page Count	2
Lead Document	Download Document
This link is active for 45 days.	

For technical assistance, contact your service provider

WA00414

Janelle

From: efilingmail@tylerhost.net
Sent: Wednesday, September 27, 2017 4:00 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1555141

Filing Submitted

Envelope Number: 1555141

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/27/2017 3:58 PM PST
Filing Type	Discovery Commissioners Report and Recommendations - DCRR
Filing Description	Discovery Commissioners Report and Recomendations
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1555141

Document Details	
Document Title	doc00288920170927155330.pdf
Lead Document Page Count	8
Lead Document	Download Document
This link is active for 45 days.	

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WA00415

Janelle

From: efilingmail@tylerhost.net
Sent: Friday, September 29, 2017 3:17 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1567417

Filing Submitted

Envelope Number: 1567417

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/29/2017 3:15 PM PST
Filing Type	Order Shortening Time - OST
Filing Description	Plaintiffs' Motion to De-Designate Viking's Confidentiality of Their Documents on an Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1567417

Document Details	
Document Title	Motion to De-Designate Confidentiality on OST (E-file ONLY).pdf
Lead Document Page Count	56
Lead Document	Download Document
This link is active for 45 days.	

WA00416

Janelle

From: efilimgmail@tylerhost.net
Sent: Friday, September 29, 2017 3:33 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1567620

Filing Submitted

Envelope Number: 1567620

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	9/29/2017 3:30 PM PST
Filing Type	Order Shortening Time - OST
Filing Description	Plaintiffs' Motion to Strike the Viking Defendants' Answer on Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1567620

Document Details	
Document Title	Signed Motion to Strike Viking's Answers on OST (E-file ONLY).pdf
Lead Document Page Count	196
Lead Document	Download Document
This link is active for 45 days.	

WA00417

Janelle

From: efilingmail@tylerhost.net
Sent: Monday, October 02, 2017 12:03 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1571719

Filing Submitted

Envelope Number: 1571719

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details

Court	Eighth Judicial District Court
Date/Time Submitted	10/2/2017 12:02 PM PST
Filing Type	Receipt of Copy - ROC
Filing Description	Receipt of Copy
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details

Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.

If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).

Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)

For additional details regarding your fees click the link below

<https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1571719>

Document Details

Document Title	doc00312320171002115522.pdf
Lead Document Page Count	2
Lead Document	Download Document
This link is active for 45 days.	

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WA00418

Janelle

From: efilimgmail@tylerhost.net
Sent: Wednesday, October 04, 2017 4:42 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1587795

Filing Submitted

Envelope Number: 1587795
Case Number: A-16-738444-C
Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	10/4/2017 4:41 PM PST
Filing Type	Motion to Reconsider - MRCN
Filing Description	Plaintiffs Motion to Reconsider Order Granting The Viking Defendants Motions to Associate Counsel
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1587795

Document Details	
Document Title	doc00346320171004163723.pdf
Lead Document Page Count	91
Lead Document	Download Document
This link is active for 45 days.	

WA00419

Janelle

From: efilingmail@tylerhost.net
Sent: Monday, October 16, 2017 3:13 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1636477

Filing Submitted

Envelope Number: 1636477

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,

Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	10/16/2017 3:10 PM PST
Filing Type	Reply - RPLY
Filing Description	Reply to Viking's opposition to Plaintiffs motion to Strike the Viking Defendants' Answer on order SHortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1636477

Document Details	
Document Title	doc00431820171016150031.pdf
Lead Document Page Count	69
Lead Document	Download Document
This link is active for 45 days.	

WA00420

Jen

From: Ashley Ferrel
Sent: Monday, October 16, 2017 10:23 AM
To: Jen
Subject: FW: Receipt of Order

Please add to Edgeworth costs

-----Original Message-----

From: courtweb1@riverside.courts.ca.gov [<mailto:courtweb1@riverside.courts.ca.gov>]
Sent: Monday, October 16, 2017 10:27 AM
To: Ashley Ferrel
Subject: Receipt of Order

Thank you for your order. Your payment has been received.
Details of your order are as follows:

Order ID: # 683733.
Order Date: 10/16/2017
Name: Simon Law

Document(s):

Case RIC1504932 HEARING RE: MOT (1pgs)

Total Paid: \$1.00
Method of Payment: American Express*****1039

=====

This message was sent by an automatic mailer, please do not reply.

Janelle

From: efilimgmail@tylerhost.net
Sent: Tuesday, October 17, 2017 2:02 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1642018

Filing Submitted

Envelope Number: 1642018

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,

Plaintiff(s)vs.Lange Plumbing, L.L.C.,

Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	10/17/2017 2:00 PM PST
Filing Type	Supplement - SUPPL
Filing Description	Supplement to Reply to Viking's Opposition to Plaintiffs' Motion to Strike the Viking Defendants' Answer on Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1642018

Document Details	
Document Title	Supp to Reply to Mot to Strike.pdf
Lead Document Page Count	26
Lead Document	Download Document
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WA00422

Janelle

From: efilimgmail@tylerhost.net
Sent: Friday, November 03, 2017 4:27 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1721114

Filing Submitted

Envelope Number: 1721114

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	11/3/2017 4:26 PM PST
Filing Type	Motion - MOT
Filing Description	Plaintiffs Motion to Compel Viking Documents and for Order to Respond to Discovery Regarding Their Financial Information on Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1721114

Document Details	
Document Title	doc00627720171103161753.pdf
Lead Document Page Count	28
Lead Document	Download Document
This link is active for 45 days.	

WA00423

Janelle

From: efilimgmail@tylerhost.net
Sent: Friday, November 03, 2017 4:27 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1721114

Filing Submitted

Envelope Number: 1721114

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	11/3/2017 4:26 PM PST
Filing Type	Motion - MOT
Filing Description	Plaintiffs Motion to Compel Viking Documents and For Order to Respond to Discovery on Order Shortening Time
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1721114

Document Details	
Document Title	doc00627820171103161813.pdf
Lead Document Page Count	57
Lead Document	Download Document
This link is active for 45 days.	

WA00424

Janelle

From: efilimgmail@tylerhost.net
Sent: Friday, November 03, 2017 11:08 AM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1717593

Filing Submitted

Envelope Number: 1717593

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	11/3/2017 11:07 AM PST
Filing Type	Notice of Entry of Order - NEOJ
Filing Description	Notice of Entry of Order Granting Plaintiffs Motion to Amend the Complaint to Add Viking Group, Inc.
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total:\$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1717593

Document Details	
Document Title	doc00619320171103105522.pdf
Lead Document Page Count	6
Lead Document	Download Document
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WA00425

Janelle

From: efilimgmail@tylerhost.net
Sent: Monday, November 06, 2017 4:45 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1727936

Filing Submitted

Envelope Number: 1727936

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	11/6/2017 4:44 PM PST
Filing Type	Receipt of Copy - ROC
Filing Description	Receipt of Copy
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
Total: \$3.50 (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=1727936

Document Details	
Document Title	doc00638520171106164135.pdf
Lead Document Page Count	2
Lead Document	Download Document
This link is active for 45 days.	

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WA00426

Janelle

From: efilingmail@tylerhost.net
Sent: Tuesday, December 05, 2017 2:58 PM
To: Lawyers
Subject: Filing Submitted for Case: A-16-738444-C; Edgeworth Family Trust, Plaintiff(s)vs.Lange Plumbing, L.L.C., Defendant(s); Envelope Number: 1845408

Filing Submitted

Envelope Number: 1845408

Case Number: A-16-738444-C

Case Style: Edgeworth Family Trust,
Plaintiff(s)vs.Lange Plumbing, L.L.C.,
Defendant(s)



Filing Details	
Court	Eighth Judicial District Court
Date/Time Submitted	12/5/2017 2:57 PM PST
Filing Type	Subpoena Duces Tecum - SUBP (CIV)
Filing Description	Subpoena Duces Tecum for Athanasia E. Dalacas, Esq.
Type of Filing	EFileAndServe
Filed By	Daniel Simon
Filing Attorney	Daniel Simon

Fee Details
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Document Title	doc00871220171205145439.pdf
Lead Document Page Count	4
Lead Document	Download Document
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WA00427

TRANSCRIBER'S BILLING INFORMATION

CASE #	A738444		
CASE NAME:	Edgeworth v. Lange		
HEARING DATE:	Aug. 23, 2017		
DEPARTMENT - RECORDER:	DISCOVERY - FRANCESCA HAAK, EXT. 4642		
ORDERED BY:	Daniel S. Simon, Esq. [By: Janelle, Legal Assistant]		
FIRM:	Simon Law		
EMAIL:	Janelle@SIMONLAWLV.COM		
PAYABLE TO:	<p>Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check</p> <p><i>PD. 8/29/17</i> <i>OK \$23052</i></p> <p>Or pay by credit card by calling 702-671-4507</p> <p>If Mailing [not advised]: Regional Justice Center Fiscal Services - Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155</p>		
BILL AMOUNT:	1	CDs @ \$25 each =	\$ 25.00
	2	hours @ \$40 an hour recording fee	\$ 80.00
		pages @ \$ per pg transcript	\$
	Total		\$ 105.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to:		
BILL AMOUNT:	pages @	\$	per page of trans \$
DATE PAID:			
TRANSCRIPT/CD WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED			

IT IS NOT ADVISED TO MAIL YOUR CHECK. IF YOU CHOOSE TO MAIL YOUR CHECK, PLEASE EXPECT DELAYS IN PROCESSING.

23052

LAW OFFICE OF DANIEL S. SIMON
A PROFESSIONAL CORPORATION
GENERAL ACCOUNT
810 S. CASINO CENTER BLVD.
LAS VEGAS, NV 89101

BANK OF NEVADA
A Division of Western Alliance Bank
Member FDIC

94-17711224
8/1/2017 2131

8/28/2017

PAY TO THE ORDER OF Clark Country Treasurer

\$ **105.00

One Hundred Five and 00/100

DOLLARS

Clark Country Treasurer



MEMO

Edgeworth / Case No: A738444 / CD

AUTHORIZED SIGNATURE

⑈023052⑈ ⑆12240178⑆ 0220019614⑈

EIGHTH JUDICIAL DISTRICT COURT
TRANSCRIPTION PURCHASE
RECEIPT OF PAYMENT

102716

DATE: 8-29-17	PURCHASER: DANIEL SIMON, ESQ.
CASE NUMBER: A735444	CASE NAME: E. M. WORTH vs. LANCE
HEARING DATE: 8-23-17	DEPARTMENT: DISCOVERY

ITEM DESCRIPTION	COST
1 CD	25.00
2 Wks Recording fee	80.00
\$40.00 per Wk	
TOTAL AMOUNT DUE	105.00

Paid SP 8/29/17 CK # 23052

WHITE COPY - CASHIER'S OFFICE YELLOW COPY - TRANSCRIBER'S OFFICE PINK COPY - CUSTOMER

REV. 7/14

TRANSCRIBER'S BILLING INFORMATION

CASE #	A738444				
CASE NAME:	Edgeworth v. Lange				
HEARING DATE:	October 4, 2017				
DEPARTMENT - RECORDER:	DISCOVERY - FRANCESCA HAAK, EXT. 4642				
ORDERED BY:	Daniel Simon, Esq. [By: Janelle]				
FIRM:	Simon Law				
EMAIL:	Janelle@simonlawlv.com 702-304-1650				
PAYABLE TO:					
Or pay by credit card by calling 702-671-4507		Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check			
		If Mailing [not advised]: Regional Justice Center Fiscal Services - Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155			
BILL AMOUNT:			CDs @ \$25 each =		\$
		1	hours @ \$40 an hour recording fee		\$ 40.00
		25	pages	\$5.01 per pg transcript	\$125.25
		Total			\$165.25
PAYABLE TO OUTSIDE TRANSCRIBER:		Make check payable to:			
BILL AMOUNT:		pages @	\$	per page of trans	\$
DATE PAID:					
TRANSCRIPT/CD WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED					

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*previously paid

22839

LAW OFFICE OF DANIEL S. SIMON
A PROFESSIONAL CORPORATION
GENERAL ACCOUNT
810 S. CASINO CENTER BLVD.
LAS VEGAS, NV 89101

BANK OF NEVADA
A division of Western Alliance Bank
Member FDIC

94-1771224
2131
MICR CHECK #88-01

10/10/2017

PAY TO THE
ORDER OF

Clark Country Treasurer

\$ **165.25

DOLLARS

One Hundred Sixty-Five and 25/100*****

Clark Country Treasurer

MEMO

A738444 / Edgeworth v. Lange



AUTHORIZED SIGNATURE

⑈022839⑈ ⑈122401778⑈ 022001961⑈

**EIGHTH JUDICIAL DISTRICT COURT
TRANSCRIPTION PURCHASE
RECEIPT OF PAYMENT**

19381

DATE: 10-10-17	PURCHASER: Daniel Simon, Esq.
CASE NUMBER: 10 -A 738444	CASE NAME: Edgewood v. [unclear]
HEARING DATE: 10-11-17	DEPARTMENT: Discovery

ITEM DESCRIPTION	COST
1 Hr. Recording Fee	40.00
25 pgs. at \$5.00 ppg. for transcript	125.00
TOTAL AMOUNT DUE	165.00

Paid PD 10/10/17 CV# 22839

WHITE COPY - CASHIER'S OFFICE YELLOW COPY - TRANSCRIBER'S OFFICE PINK COPY - CUSTOMER

REV 7/14



Verbatim Digital Reporting
3317 West Layton Avenue
Englewood, CO 80110

Invoice

Date	Invoice #
10/16/2017	2176

Daniel S. Simon, Esq.
c/o Janelle
Simon Law
810 S. Casino Center Blvd.
Las Vegas, NV 89101

Terms	Due Date
Due on receipt	10/16/2017

Description	Qty	Rate	Amount
Transcript of hearing held on 10/3/2017 Motions Hearing In Re Edgeworth Family Trust, et al. v. Lange Plumbing, LLC, et al. Case No. A738444, Dept. 10 District Court, Clark County, Nevada	27	5.01	135.27
<i>pd. 10/16/17 OK # 23193</i>			
Phone #	Fax #	E-mail	Total
303-798-0890	303-797-0432	Julie@VerbatimDigitalReporting.Com	\$135.27
			Payments/Credits
			\$0.00
			Balance Due
			\$135.27

JD Reporting, Inc.
 11246 Ethan Brook St.
 Las Vegas, NV 89183
 702.378-3456

Invoice

Bill To
SIMON LAW
702.364.1650
810 S CASINO CENTER CLVD
LAS VEGAS, NV 89101

Date	Invoice No.	Department No.	Terms	Date/Case No./Name
10/23/17	2017-53	Disc	Due on receipt	2017-10-18 / A738444 / Edgeworth Family T

Item	Description	Quantity	Rate	Amount
Transcript - 4 Days	2017-10-18 / A738444 / Edgeworth Family Trust vs Lange Plumbing LLC - All Pending Motions	104	5.01	521.04
<div>Pl. 10/23/17 CR 23196</div> <div>PLEASE NOTE NEW ADDRESS</div> <div>Tax ID No. 47-2121214</div>				
			Subtotal	\$521.04
			Sales Tax	\$0.00
			Total	\$521.04

TRANSCRIBER'S BILLING INFORMATION

CASE #	A738444				
CASE NAME:	Edgeworth v. Lange				
HEARING DATE:	Oct. 18, 2017				
DEPARTMENT - RECORDER:	DISCOVERY - FRANCESCA HAAK, EXT. 4642				
ORDERED BY:	Daniel Simon, Esq. [By: Janelle]				
FIRM:	Simon Law				
EMAIL:	Janelle@simonlawlv.com Ashley@simonlawlv.com				
PAYABLE TO:	<p>Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check</p> <p><i>JD. 10/23/17 OK \$ 23195</i></p> <p>Or pay by credit card by calling 702-671-4507</p> <p>If Mailing [not advised]: Regional Justice Center Fiscal Services - Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155</p>				
BILL AMOUNT:		CDs @ \$25 each =		\$	
	3	hours @ \$40 an hour recording fee \$120 split in 1/2 w/atty pancoast		\$ 60.00	
		pages	\$	per pg transcript	\$
				Total	\$ 60.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to: JD Reporting, Inc.				
BILL AMOUNT:	104	pages @	\$5.01	per page of trans	\$521.04
DATE PAID:					
	TRANSCRIPT/CD WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED				

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*previously paid

TRANSCRIBER'S BILLING INFORMATION

CASE #	A738444		
CASE NAME:	Edgeworth v. Lange		
HEARING DATE:	Oct. 24, 2017		
DEPARTMENT - RECORDER:	DISCOVERY - FRANCESCA HAAK, EXT. 4642		
ORDERED BY:	Daniel Simon, Esq. [By: Janelle]		
FIRM:	Simon Law		
EMAIL:	Janelle@simonlawlv.com Ashley@simonlawlv.com		
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 Include case number on check If Mailing [not advised]: Regional Justice Center Fiscal Services - Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155		
Or pay by credit card by calling 702-671-4507			
BILL AMOUNT:		CDs @ \$25 each =	\$
	2	hours @ \$40 an hour recording fee \$80 split in 1/2 w/atty pancoast	\$ 40.00
	55	pages \$5.01+3.62copy=\$8.63x55=474.65 split in 1/2 w/atty pancoast	\$237.33
		per pg transcript	
	Total		\$277.33
PAYABLE TO OUTSIDE TRANSCRIBER:			
BILL AMOUNT:	pages @	\$	per page of trans
DATE PAID:			
TRANSCRIPT/CD WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED			

20. 10/31/17
 \$237.33

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LAW OFFICE OF DANIEL S. SIMON
A PROFESSIONAL CORPORATION
GENERAL ACCOUNT
810 S. CASINO CENTER BLVD.
LAS VEGAS, NV 89101

BANK OF NEVADA
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23305

94-177/1224
2131
CHECK NUMBER

11/27/2017

PAY TO THE
ORDER OF

Verbatim Digital Reporting

\$ **390.78

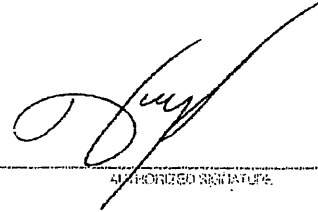
Three Hundred Ninety and 78/100*****

DOLLARS.

Verbatim Digital Reporting, LLC
3317 W. Layton Ave.
Englewood, CO 80110

MEMO

Inv # 2195 / Edgeworth



AUTHORIZED SIGNATURE

⑈023305⑈ ⑆122401778⑆ 0220019614⑈

G. Druiser

WA00438

Ashley Ferrel

Edgeworth
Domesticating

From: Judicial Attorney Services, Inc. <receipts+tb34iBDZFbMI06DmXKXh@stnpe.com>
Sent: Friday, October 13, 2017 9:20 AM
To: Ashley Ferrel
Subject: Your Judicial Attorney Services, Inc. receipt [#1265-7890]

Subpoena in
Cook County, IL
for UL Laboratory



\$590.30 at Judicial Attorney Services, Inc.

Daniel Simon —  7002

October 13, 2017

#1265-7890

Description	Amount
Amount	\$590.30
Total	\$590.30

Have a question or need help? Send us an email or give us a call at +1 630-221-9007.

Something wrong with the email? View it in your browser.
You are receiving this email because you made a purchase at Judicial Attorney Services, Inc.

Jen

From: Direct Legal Support In <notifications@paytrace.com>
Sent: Tuesday, October 17, 2017 5:08 PM
To: Jen
Subject: Direct Legal Support In transaction receipt. 10/17/2017 5:03:11 PM Pacific - Invoice: 45953

Direct Legal Support In

1541 Wilshire Blvd
LOS ANGELES, CA 90017
800-675-5376

10/17/2017 5:00:27 PM

Reference Number: 179723017
Total: \$280.00
Transaction Type: Sale
Transaction Status: Pending Settlement
Card Type: American Express
Card Number: xxxxxxxxxxxx7002
Entry Method: Keyed
Approval Code: 280890
Approval Message: EXACT MATCH
AVS Result: Full Exact Match
CSC Result: Match
Customer Name:
Invoice: 45953
X

Please sign here to agree to payment.

Jen

From: Janelle
Sent: Tuesday, October 17, 2017 4:48 PM
To: Jen
Cc: Ashley Ferrel
Subject: FW: Edgeworth v. Lange et al. - domesticate subpoena

Jen
can you please pay this asap. thanks

JANELLE WHITE
LEGAL ASSISTANT
SIMON LAW
810 South Center Center Blvd.
Las Vegas, NV 89101
(P) 702.364.1650
(F) 702.364.1655
JANELLE@SIMONLAWLV.COM

From: Sheri Kern [mailto:skern@directlegal.com]
Sent: Tuesday, October 17, 2017 4:36 PM
To: Janelle <Janelle@SIMONLAWLV.COM>; Subpoena <subpoena@directlegal.com>
Cc: Ashley Ferrel <Ashley@SIMONLAWLV.COM>
Subject: RE: Edgeworth v. Lange et al. - domesticate subpoena

The total due is \$280.00

Inv # 459530

Thank you,

pd. by phone w/Amey
10/17/17

Sheri J. Kern
Vice President / CFO
Direct Legal Support, Inc.
Office: 800-675-5376 Ext 238
Fax: 866-241-0051
www.directlegal.com | skern@directlegal.com
Connect with us: [Facebook](#) | [Twitter](#)

Effective 12-1-16 - Our New Address is: 1541 Wilshire Blvd, Suite 550, Los Angeles, CA 90017

Did You Know? Direct Legal offers e-Filing in California with Orange County Courts, San Francisco and Riverside! Learn more [here](#).

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From: Janelle [mailto:Janelle@SIMONLAWLV.COM]

Sent: Friday, October 13, 2017 2:48 PM

To: Subpoena <subpoena@directlegal.com>

Cc: Ashley Ferrel <Ashley@SIMONLAWLV.COM>

Subject: Edgeworth v. Lange et al. - domesticate subpoena

Attached please find the following documents to be domesticated:

- SUBP-030
- SUBP-045
- NV SDT
- NV Notice
- NV Commission to Take out of State Depo

Please advise the amount and I will pay online with a credit card. If you have any questions or need anything else please let me know. Thank you.

JANELLE WHITE
LEGAL ASSISTANT
SIMONLAW
810 South Casino Center Blvd.
Las Vegas, NV 89101
(702) 364-1650
(702) 364-1655
JANELLE@SIMONLAWLV.COM

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KC INVESTIGATIONS, LLC

1148 S. MARYLAND PKWY
LAS VEGAS, NV 89104
PHONE# 702-474-4102
FAX# 702-474-4137

Invoice

Date	Invoice #
10/19/2017	5621

Bill To
SIMON LAW 810 S. CASINO CENTER BLVD. LAS VEGAS, NV 89101 ATTN: JANELLE

Client
EDGEWORTH FAMILY TRUST

Date Served	Terms	Server
09/06/2017	Due on receipt	

Item	Description	Amount
SERVE	SERVED SUBPOENA-CIVIL DUCES TECUM AND RE-NOTICE OF DEPOSITION DUCES TECUM OF THE CUSTODIAN OF RECORDS FOR RIMKUS CONSULTING GROUP, INC. TO COR RIMKUS CONSULTING GROUP, INC WITH DAVID M. BURDICK, CPA (CHIEF FINANCIAL OFFICER) AT EIGHT GREENWAY PLAZA SUITE 500, HOUSTON, TX 77046 <i>ed. 10/19/17 OK # 23225</i>	150.00
Thank you for your business.		Total \$150.00

WA00443



1541 Wilshire Blvd., Suite 550 Los Angeles, CA 90017
Phone: (213) 483-4900 Fax: (866) 241-0051

TAX ID: 20-2821265

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
012940	11/28/2017	48372

Bill To:
SIMON LAW
ATTN: JANELLE WHITE
810 SOUTH CASINO CENTER BLVD
LAS VEGAS, NV 89101

File No:
Served: CUSTODIAN OF RECORDS FOR RENE STONE &
ASSOCIATES
Case No: A-16-738444-C
Court: SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
Plaintiff: EDGEWORTH FAMILY TRUST & AMERICAN GRATIN
Defendant: LANGE PLUMBING, LLC; THE VIKING CORP., E

Documents: APPLICATION FOR DISCOVERY SUBPOENA IN ACTION PENDING OUTSIDE CALIFORNIA; DEPOSITION SUBPOENA
FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN
ACTION PENDING OUTSIDE CALIFORNIA;

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Issue and Serve Subpoena Advance PD. 11/29/17 OK # 23201			250.00 30.00
SUMMARY Served: CUSTODIAN OF RECORDS FOR RENE STONE & ASSOCIATES Address: 1399 W. COLTON AVE, # 4 REDLANDS, CA 92374 Result: Personally Served Completed on 11/17/2017		TOTAL DUE	\$ 280.00

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ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
012940	11/28/2017	48372

Remit To:


Direct Legal Support, Inc.
1541 Wilshire Blvd., Suite 550
Los Angeles, CA 90017

TOTAL DUE: \$ 280.00

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- MAKE CHECKS PAYABLE TO Direct Legal Support, Inc.

Order#: 48372 //INVOICEP

WA00444

610 SOUTH CASINO CENTER BLVD LAS VEGAS, NV 89101 CASE NUMBER: A-16-738444-C	 SUMMARY OF SERVICE JOB COMPLETE 48372 PROCESS SERVICE
SUMMARY OF SERVICE	COMPLETED BY Maurice Polan REG: 1173 - Riverside
	Reference No.:

DOCUMENTS SERVED: APPLICATION FOR DISCOVERY SUBPOENA IN ACTION PENDING OUTSIDE CALIFORNIA; DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA;

PARTY SERVED: CUSTODIAN OF RECORDS FOR RENE STONE & ASSOCIATES

DATE & TIME OF SERVICE: 11/17/2017
12:25 PM

ADDRESS, CITY, AND STATE: 1399 W. COLTON AVE, 4
REDLANDS, CA 92374

PHYSICAL DESCRIPTION: Age: 28 Weight: 120 Hair: DARK
Sex: Female Height: 5'8
Race: WHITE

MANNER OF SERVICE:

Personal Service - By personally delivering copies to CUSTODIAN OF RECORDS FOR RENE STONE & ASSOCIATES.

OFFICIAL AFFIDAVIT OF SERVICE/NON-SERVICE WILL FOLLOW IN THE MAIL

KC INVESTIGATIONS, LLC

1148 S. MARYLAND PKWY
LAS VEGAS, NV 89104
PHONE# 702-474-4102
FAX# 702-474-4137

Invoice

Date	Invoice #
11/22/2017	5892

Bill To
SIMON LAW 810 S. CASINO CENTER BLVD. LAS VEGAS, NV 89101 ATTN: JANELLE

Client
EDGEWORTH FAMILY TRUST

Date Served	Terms	Server
11/20/2017	Due on receipt	JR

Item	Description	Amount
SERVE	SERVED SUBPOENA DUCES TECUM AND NOTICE OF VIDEO DEPOSITION OF ATHANASIA E. DALACAS, ESQ. DUCES TECUM TO ATHANASIA E. DALACAS, ESQ. WITH STEPHANIE GESCHKE (FRONT OFFICE) AT 1720 W. HORIZON RIDGE PKWY #140, HENDERSON, NV 89012	70.00
COST	WITNESS FEE CHECK	26.00
<i>PAID - 12/16/17 OK # 23344</i>		
Thank you for your business.		Total \$96.00



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29438	9/26/2017	23828
Job Date	Case No.	
9/18/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Angela M. Edgeworth	154.00 Pages	500.50
Exhibit	14.00 Pages	7.70
Rough-Draft ASCII	154.00 Pages	300.30
E-Bundle With Certified Copy		50.00
Condensed Transcript With Certified Copy		35.00
Statutory Administration of Transcript Subsequent to Publication		25.00
Color Copies	10.00 Pages	20.00
Local Delivery		20.00

TOTAL DUE >>> **\$958.50**

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pd. 9/26/17 ck# 23144

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

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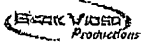
Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29438
Invoice Date : 9/26/2017
Total Due : \$958.50
AFTER 10/26/2017 PAY \$1,054.35

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 23828
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00447



Beck Video Productions LLC

5770 Speaking Rock Ave
Las Vegas, NV 89131
(702) 307-6250 Tax ID# 20-5337464

Invoice

Number: 5783

Date: September 30, 2017

Bill To:

Simon Law Office
810 S. Casino Center Blvd
Las Vegas, NV 89101

Ship To:

Daniel Simon
Simon Law Office
810 S. Casino Center Blvd
Las Vegas, NV 89101

Description	Qty	Amount
Videotaped Deposition on Sept, 26, 2017 of Raul De La Rosa		
Case: Edgeworth Family Trust vs. Lange Plumbing LLC et al		
set up fee		50.00
2 hour min @ \$95 per hour		190.00
USPS shipping		3.00
Standard DVD (non-sync) Included with Order		
<i>Pd. 10/3/17</i> <i>Ord# 23772</i>		
Sub-Total		\$243.00
Sales Tax 8.10% on 0.00		0.00
Total		\$243.00

Thank You for choosing Beck Video Productions!



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29661	10/9/2017	24035
Job Date	Case No.	
9/26/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Raul De La Rosa	87.00 Pages	456.75
Exhibit	12.00 Pages	6.60
Half-Day Attendance		110.00
Color Copies	10.00 Pages	20.00
E-Bundle With O&I (\$20 Discount)		30.00
Condensed Transcript With O&I (\$10 Discount)		25.00
Local Delivery		20.00
TOTAL DUE >>>		\$668.35
AFTER 11/8/2017 PAY		\$735.19

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pd 10/12/17
Acct # 23185

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

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Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29661
Invoice Date : 10/9/2017
Total Due : \$668.35
AFTER 11/8/2017 PAY \$735.19

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 24035
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00449



800-843-7348 PH - 877-843-8443 FX

Daniel S. Simon
Law Offices of Daniel Simon
810 S. Casino Center Blvd.
Las Vegas, NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
635406	9/27/2017	606969
Job Date	Case No.	
9/7/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust vs. Lange Plumbing, LLC		
Payment Terms		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Robert Carnahan, P.E.

2,924.90

Exhibits - Onsite copies - B/W

51.00

LITIGATION SUPPORT OF:

Robert Carnahan, P.E. - VIDEO

1,440.00

TOTAL DUE >>>

\$4,364.90

Thank you for choosing Sousa Court Reporters + Trial Solutions! Please send payment within 30 days of receiving this invoice. There will be a 10% finance charge per month on late invoices.

***INSURANCE CARRIERS: Our invoices are for court reporter staffing, transcription and production costs. These costs are not subject to either insurance review or WCAB coding, and should be paid directly in-house by the billed insurance carrier.

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Complimentary Locations - Nationwide Networking - 24-7 Customer Service

pd. 10/3/17
OK #23160

Tax ID: 33-0322104

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Daniel S. Simon
Law Offices of Daniel Simon
810 S. Casino Center Blvd.
Las Vegas, NV 89101

Job No. : 606969 BU ID : 1-HB
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust vs. Lange Plumbing, LLC
Invoice No. : 635406 Invoice Date : 9/27/2017
Total Due : \$ 4,364.90

Remit To: **M&C Corporation (Sousa Court Reporters)**
736 Fourth St.
Hermosa Beach, CA 90254

PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:

WA00450



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
Info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29665	10/9/2017	24171
Job Date	Case No.	
9/28/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Colin A. Kendrick	58.00 Pages	188.50
Exhibit	64.00 Pages	35.20
E-Bundle With Certified Copy		50.00
Condensed Transcript With Certified Copy		35.00
TOTAL DUE >>>		\$308.70
AFTER 11/8/2017 PAY		\$339.57

There is never a charge for word index pages at Oasis Reporting Services, which can save you and your clients up to 27% compared to other firms charging per page for word indexes.

All invoices due upon receipt. Past due invoices accrue interest at a rate of 1.5% per month. Payment is not contingent upon client or insurance carrier reimbursement. Thank you for your business.

pd 10/12/17
OK # 23186

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29665
Invoice Date : 10/9/2017
Total Due : \$308.70
AFTER 11/8/2017 PAY \$339.57

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 24171
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00451



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29626	10/5/2017	23322
Job Date	Case No.	
9/21/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Mark C. Giberti	322.00 Pages	1,046.50
Exhibit	147.00 Pages	80.85
E-Bundle With Certified Copy		50.00
Condensed Transcript With Certified Copy		35.00
Color Copies	7.00 Pages	14.00
Local Delivery		20.00
TOTAL DUE >>>		\$1,246.35
AFTER 11/4/2017 PAY		\$1,370.99

There is never a charge for word index pages at Oasis Reporting Services, which can save you and your clients up to 27% compared to other firms charging per page for word indexes.

All invoices due upon receipt. Past-due invoices accrue interest at a rate of 1.5% per month. Payment is not contingent upon client or insurance carrier reimbursement. Thank you for your business.

pd 10/12/17
Acct# 23187

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29626
Invoice Date : 10/5/2017
Total Due : \$1,246.35
AFTER 11/4/2017 PAY \$1,370.99

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 23322
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00452



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29766	10/13/2017	23999
Job Date	Case No.	
9/29/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Brian J. Edgeworth	301.00 Pages	978.25
Exhibit	54.00 Pages	29.70
Color Copies	31.00 Pages	62.00
E-Bundle With Certified Copy		50.00
Condensed Transcript With Certified Copy		35.00
Statutory Administration of Transcript Subsequent to Publication		25.00
Rough-Draft ASCII	8.00 Pages	15.60
Local Delivery		20.00

TOTAL DUE >>> **\$1,215.55**
AFTER 11/12/2017 PAY **\$1,337.11**

There is never a charge for word index pages at Oasis Reporting Services, which can save you and your clients up to 27% compared to other firms charging per page for word indexes.

All Invoices due upon receipt. Past-due invoices accrue interest at a rate of 1.5% per month. Payment is not contingent upon client or insurance carrier reimbursement. Thank you for your business.

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29766
Invoice Date : 10/13/2017
Total Due : \$1,215.55
AFTER 11/12/2017 PAY \$1,337.11

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 23999
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00453



OASIS

REPORTING SERVICES

400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Ashley M. Ferrel
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

INVOICE

Invoice No.	Invoice Date	Job No.
29957	10/25/2017	24328
Job Date	Case No.	
10/12/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

CERTIFICATE OF NONAPPEARANCE OF:

30(b)(6) for Zurich American Insurance Company

Exhibit

Certificate of Nonappearance Attendance

E-Bundle With Nonappearance (\$30 Discount)

Local Delivery

6.00 Pages	28.50
31.00 Pages	17.05
	250.00
	20.00
	20.00

TOTAL DUE >>> \$335.55

AFTER 11/24/2017 PAY \$369.11

There is never a charge for word index pages at Oasis Reporting Services, which can save you and your clients up to 27% compared to other firms charging per page for word indexes.

All invoices due upon receipt. Past-due invoices accrue interest at a rate of 1.5% per month. Payment is not contingent upon client or insurance carrier reimbursement. Thank you for your business.

pd 10/23/17
CHK# 23233

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Ashley M. Ferrel
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 29957
Invoice Date : 10/25/2017
Total Due : \$335.55
AFTER 11/24/2017 PAY \$369.11

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 24328
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00454

INVOICE



400 South Seventh Street
Suite 400, Box 7
Las Vegas, NV 89101

Tel. (702) 476-4500
info@oasisreporting.com
www.oasisreporting.com

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No.	Invoice Date	Job No.
30038	10/30/2017	24429
Job Date	Case No.	
10/16/2017	A-16-738444-C	
Case Name		
Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.		
Payment Terms		
Net 21		

1. CERTIFIED COPY OF TRANSCRIPT OF:		
Margaret Ho	30.00 - Pages	105.00
E-Bundle With Certified Copy		50.00
Condensed Transcript With Certified Copy		35.00
Statutory Administration of Transcript Subsequent to Publication		25.00
Local Delivery		20.00
TOTAL DUE >>>		\$235.00
AFTER 11/29/2017 PAY		\$258.50
There is never a charge for word index pages at Oasis Reporting Services, which can save you and your clients up to 27% compared to other firms charging per page for word indexes.		
All invoices due upon receipt. Past due invoices accrue interest at a rate of 1.5% per month. Payment is not contingent upon client or insurance carrier reimbursement. Thank you for your business.		

pd. 11/1/17
OUT 23248

Tax ID: 26-3403945

Phone: 702-364-1650 Fax: 702-364-1655

Please detach bottom portion and return with payment.

Daniel S. Simon
Simon Law
810 South Casino Center Boulevard
Las Vegas NV 89101

Invoice No. : 30038
Invoice Date : 10/30/2017
Total Due : \$235.00
AFTER 11/29/2017 PAY \$258.50

Remit To: Oasis Reporting Services, LLC
400 South Seventh Street
Suite 400, Box 7
Las Vegas NV 89101

Job No. : 24429
BU ID : 1-MAIN
Case No. : A-16-738444-C
Case Name : Edgeworth Family Trust, et al. v. Lange Plumbing, L.L.C., et al.

WA00455

SKLAR WILLIAMS

— PLLC —

410 South Rampart Boulevard, Suite 350
Las Vegas, Nevada 89145
(702) 360-6000 Fax: (702) 360-0000
E.I.N.: 88-0417280

October 01, 2017

Edgeworth Family Trust
Attn.: Brian Edgeworth
1191 Center Point Drive
Henderson, NV 89024

Invoice # 94805

REMITTANCE FORM AND BILLING SUMMARY

	<u>Fees</u>	<u>Costs</u>	<u>Previous Balance</u>	<u>Payments</u>	<u>New Balance</u>
Re: 17020.001 Expert Witness in Edgeworth Family Trust, et al. v. The Viking Corporation, et al. Invoice # 94805					
	\$13,770.00	\$0.00	\$4,100.00	(\$4,100.00)	\$13,770.00

PAYMENTS RECEIVED AFTER SEPTEMBER 30, 2017 WILL NOT APPEAR ON THIS INVOICE.

PAYMENT IS DUE UPON RECEIPT.

PLEASE MAKE ALL CHECKS PAYABLE, IN U.S. FUNDS, TO: SKLAR WILLIAMS PLLC

WE ACCEPT CREDIT CARDS!
PLEASE CALL (702) 360-6000 FOR AUTHORIZATION.

PLEASE REMIT THIS SUMMARY TOGETHER WITH YOUR PAYMENT. THANK YOU!

Ed. 10/12/17
CR # 2392

Sklar Williams PLLC

WA00456

SKLAR WILLIAMS
— PLLC —
410 South Rampart Boulevard, Suite 350
Las Vegas, Nevada 89145
(702) 360-6000 Fax: (702) 360-0000
E.I.N.: 88-0417280

November 15, 2017

Edgeworth Family Trust
Attn.: Brian Edgeworth
1191 Center Point Drive
Henderson, NV 89024

Invoice # 95158

REMITTANCE FORM AND BILLING SUMMARY

	<u>Fees</u>	<u>Costs</u>	<u>Previous Balance</u>	<u>Payments</u>	<u>New Balance</u>
Re: 17020.001 Expert Witness in Edgeworth Family Trust, et al. v. The Viking Corporation, et al. Invoice # 95158					
	\$5,500.00	\$0.00	\$13,770.00	(\$13,770.00)	\$5,500.00

PAYMENTS RECEIVED AFTER NOVEMBER 15, 2017 WILL NOT APPEAR ON THIS INVOICE.

PAYMENT IS DUE UPON RECEIPT.

PLEASE MAKE ALL CHECKS PAYABLE, IN U.S. FUNDS, TO: SKLAR WILLIAMS PLLC

WE ACCEPT CREDIT CARDS!
PLEASE CALL (702) 360-6000 FOR AUTHORIZATION.

PLEASE REMIT THIS SUMMARY TOGETHER WITH YOUR PAYMENT. THANK YOU!

*pd. 11/27/17
Owe \$23299*

Sklar Williams PLLC

WA00457

Edgeworth Family Trust

November 15, 2017

Page 2

Re: 17020.001

Expert Witness in Edgeworth Family Trust, et al. v. The Viking Corporation, et al.

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
11/07/17 CMP Meeting with D. Simon regarding supplemental report.	0.30	150.00
11/08/17 CMP Review additional documents provided; begin first draft of supplemental report.	1.20	600.00
11/09/17 CMP Continue first draft of supplemental opinion.	3.90	1,950.00
11/10/17 CMP Phone call with client and counsel regarding status of supplemental opinion; continue review of documents.	0.30	150.00
11/12/17 CMP Continue first draft of supplemental opinion; continue review of relevant documents.	2.20	1,100.00
11/13/17 CMP Complete draft of supplemental opinion letter; edit and review same (x2); call with D. Simon regarding sending final draft.	3.10	1,550.00

SUBTOTAL OF CHARGES

<u>\$5,500.00</u>
11.00 \$5,500.00

PREVIOUS BALANCE

\$13,770.00

10/20/2017 Payment - thank you - Fees [CMP]. Check No. 23192

(\$13,770.00)

Total payments and adjustments

(\$13,770.00)

BALANCE DUE (Due Upon Receipt)

\$5,500.00

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Crane M. Pomerantz	11.00	500.00	\$5,500.00

Sklar Willinns PLLC

WA00458

Ivey Engineering, Inc.

8330 Juniper Creek Lane

San Diego, CA 92126

Phone: (858) 587-2874

Fax: (858) 587-6749

To: Accounts Payable
Law Office of Daniel S. Simon
810 S. Casino Center Blvd.
Las Vegas, NV 89101

Invoice

Date	Number
10/17/2017	16620

Terms
Due Upon Receipt Credit Cards Accepted

Tax ID Number
33-0860901

CC:

Job No: 114-01R

Re: Edgeworth Residence

Date		Description	Rate	Hours	Amount
9/6/2017	Kevin H.	Review documents received from client.	\$190.00	2.90	551.00
9/8/2017	Kevin H.	Review documents received from client.	\$190.00	5.90	1,121.00
9/11/2017	Kevin H.	Correspondence with client, review documents from client.	\$190.00	3.90	741.00
9/12/2017	Kevin H.	Review documents received from client.	\$190.00	2.90	551.00
9/13/2017	Kevin H.	Review documents received from client.	\$190.00	2.00	380.00
9/14/2017	Kevin H.	Review documents received from client.	\$190.00	6.20	1,178.00
9/15/2017	Kevin H.	Draft report and perform research and analysis.	\$190.00	8.00	1,520.00
9/18/2017	Kevin H.	Draft rebuttal report.	\$190.00	8.00	1,520.00
9/19/2017	Nova S.	Organize project documents.	\$75.00	0.50	37.50
9/19/2017	Kevin H.	Review documents received from client.	\$190.00	1.10	209.00
9/20/2017	Kevin H.	Review load on link test data.	\$190.00	0.40	76.00
9/21/2017	Kevin H.	Review documents received from client, review attic data.	\$190.00	2.30	437.00
9/22/2017	Kevin H.	Review documents received from client.	\$190.00	4.00	760.00

TOTAL CURRENT CHARGES

\$9,081.50

Interest on past due balance

\$186.06

HVAC, Plumbing, Electrical and Fire Sprinkler Consultants

WA00459

Re: Edgeworth Residence

Page 2

Date: 10/17/2017
Invoice #: 16620

	<u>Amount</u>
TOTAL THIS INVOICE	\$9,267.56
Previous balance	\$15,720.63
BALANCE DUE	\$24,988.19

pd. 9/14/17
chk # 23119
VOIDED

\$15,720.63
previously billed
& paid on
last invoice

per
gloria - waiving
interest
10/26/17
JN

Ivey Engineering, Inc.

8330 Juniper Creek Lane

San Diego, CA 92126

Phone: (858) 587-2874

Fax: (858) 587-6749

To: Accounts Payable
Law Office of Daniel S. Simon
810 S. Casino Center Blvd.
Las Vegas, NV 89101

Invoice

Date	Number
11/13/2017	16700

Terms
Due Upon Receipt Credit Cards Accepted

Tax ID Number
33-0860901

CC:

Job No: 114-01R

Re: Edgeworth Residence

Date		Description	Rate	Hours	Amount
10/2/2017	Kevin H.	Review documents received from client.	\$190.00	4.50	855.00
10/3/2017	Kevin H.	Review documents received from client.	\$190.00	4.40	836.00

TOTAL CURRENT CHARGES\$1,691.00

Previous balance

\$24,988.19

10/30/2017 Pmt inv 16543 & 16620 by Law Office of Daniel S. Simon. Check No. 23235

(\$24,802.13)**BALANCE DUE**\$1,877.06

pd. 11/27/17
OK # 23298

HVAC, Plumbing, Electrical and Fire Sprinkler Consultants

WA00461



2421 Palm Drive, Signal Hill, CA 90755
Tel: 562-427-VGEL (8435) Fax: 562-427-8434

STATEMENT

DATE

10/25/2017

TO:

Law Offices of Daniel S. Simon
Attention: Daniel S. Simon
810 S. Casino Center Blvd.
Las Vegas, NV 89101

NOTE: All invoices are due and payable on receipt regardless of the status of a case. Any invoices not paid within 30 days are subject to collection activity. Please make timely payments.

		AMOUNT DUE	AMOUNT ENCL		
		\$20,105.00			
DATE	TRANSACTION	AMOUNT	BALANCE		
08/14/2017	Balance forward		0.00		
	170045-				
08/31/2017	INV #47013. Edgeworth Family Trust vs. Lange Plumbing	22,977.50	22,977.50		
09/08/2017	PMT #23085. by Daniel Simon	-22,977.50	0.00		
09/12/2017	INV #47081. Edgeworth Trust vs. Lange Plumbing	100.00	100.00		
09/27/2017	INV #47120. Edgeworth Family Trust vs. Lange Plumbing	14,830.00	14,930.00		
10/05/2017	INV #47182. Edgeworth Family Trust vs. Lange Plumbing	1,675.00	16,605.00		
10/25/2017	INV #47237. Edgeworth Family Trust vs. Lange Plumbing	3,500.00	20,105.00		
DUE AND PAYABLE ON RECEIPT IRS No. 95-4773872					
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
3,500.00	16,505.00	100.00	0.00	0.00	\$20,105.00

pd. 11/1/17
OK# 2324

pd. 11/1/17
OK# 23244

A-CORE Consultants, Inc.

Chatsworth, CA 91311
(818) 350-0660 (818) 350-0667 FAX
20555 Devonshire Street

Invoice

DATE	INVOICE #
11/3/2017	17-228

BILL TO
Daniel S. Simon Law Office Daniel Simon 810 S Casino Center Blvd Las Vegas, NV 89101
PROJECT
17049B-645 St Corix, M'Donlad H'lands, NV

DESCRIPTION		AMOUNT
Reviewed Kirkendall Report, David Suggs Reports, and Glen Rigdon Appraisal Review, deposition preparation & discussions with attorney (4hrs @ \$500/Hr.)		2,000.00
Travel Expenses, airfare, car rental, gas & other sundries.		250.00
<div>Pd. 11/29/17 Ac# 23312</div>		
Total		\$2,250.00
Federal Tax ID Number: 95-4610379		Payments/Credits \$0.00
		Balance Due \$2,250.00

McDonald
Carano
George Ogilvie
Edgeworth

George
Ogilvie
10K
retainer

LAW OFFICE OF DANIEL S. SIMON
A PROFESSIONAL CORPORATION
GENERAL ACCOUNT
810 S. CASINO CENTER BLVD.
LAS VEGAS, NV 89101

BANK OF NEVADA
A division of Western Alliance Bank,
Member FDIC.

23296

94-1771224
2131
CHECK NUMBER

11/27/2017

PAY TO THE
ORDER OF

McDonald Carano

\$ **10,000.00

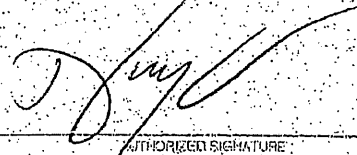
Ten Thousand and 00/100*****

DOLLARS.

McDonald Carano
George Ogilvie, Esq.
2300 W Sahara Ave #1200
Las Vegas, NV 89102

MEMO

Retainer for Edgeworth


AUTHORIZED SIGNATURE

⑈023296⑈ ⑆122401778⑆ 0220019614⑈

McDONALD CARANO

FEDERAL TAX ID 88-0074283

Edgeworth Family Trust/ American Grating
c/o Simon Law
Attn: Daniel S. Simon, Esq.
810 South Casino Center Boulevard
Las Vegas, NV 89101

Invoice No. 12362930
January 12, 2018

FOR PROFESSIONAL SERVICES RENDERED through December 31, 2017:

Re: Client.Matter: 19412 - 1
***EDGEWORTH FAMILY TRUST AND AMERICAN**
GRATING, LLC V. LANGE PLUMBING, ET AL.

Current Fees	\$ 5,062.50
Current Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 5,062.50
Trust Funds Applied	<u>\$ -5,062.50</u>
BALANCE DUE THIS INVOICE	\$.00
Trust Balance	\$ 4,937.50

mcdonaldcarano.com

100 West Liberty Street • Tenth Floor • Reno, NV 89501 • P. 775.788.2000
2300 West Sahara Avenue • Suite 1200 • Las Vegas, NV 89102 • P. 702.873.4100

 **MERITAS**
LAW FIRM

WA00465

McDONALD CARANO LLP

Invoice No. 12362930
January 12, 2018

Re: Client.Matter: 19412 - 1
EDGEWORTH FAMILY TRUST AND AMERICAN
GRATING, LLC V. LANGE PLUMBING, ET AL.

PROFESSIONAL SERVICES

Date	Atty	Description of Services	Hours
11/14/17	GFO	Exchange emails with Dan Simon	.20
11/25/17	GFO	Review emails, briefs and case law from Dan Simon; Evaluate client's position	4.40
11/28/17	GFO	Finish reviewing materials; Evaluate client's position; Prepare and send evaluation to Dan Simon	3.50

Current Fees \$ 5,062.50

SUMMARY OF PROFESSIONAL SERVICES

Timekeeper	Title	Rate	Hours	Amount	N/C \$
George F. Ogilvie	Partner	625.00	8.10	5,062.50	.00
Total			8.10	\$ 5,062.50	\$.00

TOTAL THIS INVOICE \$ 5,062.50

Trust Funds Applied \$ -5,062.50

BALANCE DUE THIS INVOICE \$.00

McDONALD CARANO

FEDERAL TAX ID 88-0074283

REMITTANCE PAGE

Edgeworth Family Trust/ American Grating
c/o Simon Law
Attn: Daniel S. Simon, Esq.
810 South Casino Center Boulevard
Las Vegas, NV 89101

Invoice No. 12362930
January 12, 2018

FOR PROFESSIONAL SERVICES RENDERED through December 31, 2017:

Re: **Client.Matter: 19412 - 1**
EDGEWORTH FAMILY TRUST AND AMERICAN
GRATING, LLC V. LANGE PLUMBING, ET AL.

BALANCE DUE THIS INVOICE

\$.00

Payment Is Due Upon Receipt. We Prefer To Avoid the Accrual of Interest: However, the Rate of 1.50% Will Be Charged Monthly, Compounded, on Any Balance After 30 Days. Thank You.

To Ensure Proper Credit Refer to Matter No. 19412 - 1

Please return this copy with your payment to:

McDonald Carano LLP

P.O. Box 2670

Reno, Nevada 89505

Wire Transfer Instructions:

Nevada State Bank
1 West Liberty Street
Reno, Nevada 89501
McDonald Carano LLP
Account No. 0542004190
Routing No. 122400779
Swift Code No. ZFNBUS55

To Pay by Credit Card:

☐ Visa ☐ Mastercard ☐ American Express

Account Number: _____

Expiration Date: ____/____

CVV Security Code: _____

Amount \$ _____

Name on Account: _____

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100 West Liberty Street • Tenth Floor • Reno, NV 89501 • P. 775.788.2000
2300 West Sahara Avenue • Suite 1200 • Las Vegas, NV 89102 • P. 702.873.4100

 **MERITAS**
LAW FIRM

WA00467

EXHIBIT 22

DECLARATION AND EXPERT REPORT OF DAVID A. CLARK

This Report sets forth my expert opinion on issues in the above-referenced matter involving Nevada law and the Nevada Rules of Professional Conduct¹ as are intended within the meaning of NRS 50.275, *et seq.* I was retained by Defendant, Daniel S. Simon, in the above litigation. The following summary is based on my review of materials provided to me, case law, and secondary sources cited below which I have reviewed.

I have personal knowledge of the facts set forth below based on my review of materials referenced below. I am competent to testify as to all the opinions expressed below. I have been a practicing attorney in California (inactive) and Nevada since 1990. For 15 years I was a prosecutor with the Office of Bar Counsel, State Bar of Nevada, culminating in five years as Bar Counsel. I left the State Bar in July 2015 and reentered private practice. I have testified once before in deposition and at trial as a designated expert in a civil case. I was also retained and produced a report in another civil case. My professional background is attached as Exhibit 1.

SCOPE OF REPRESENTATION.

I was retained to render an opinion regarding the professional conduct of attorney Daniel S. Simon, arising out of his asserting an attorney's lien and the handling of settlement funds in his representation of Plaintiffs in *Edgeworth Family Trust and American Grating, LLC v. Lange Plumbing, LLC, The Viking Corp., et al.*, Case No. A738444-C.

SUMMARY OPINION.

It is my opinion to a reasonable degree of probability that Mr. Simon's conduct is lawful, ethical and does not constitute a breach of contract or conversion as those claims are pled in *Edgeworth Family Trust, American Grating, Inc. v. Daniel S. Simon d/b/a Simon Law*, Case No. A-18-767242-C, filed January 4, 2018, in the Eighth Judicial District Court.

BACKGROUND FACTS.

In May 2016, Mr. Simon agreed to assist Plaintiffs in efforts to recover for damages resulting from flooding to Plaintiffs' home. Eventually, Mr. Simon filed suit in June 2016. The case was styled *Edgeworth Family Trust and American Grating, LLC v. Lange Plumbing, LLC, The Viking Corp., et al.*, Case No. A738444-C and was litigated in the Eighth Judicial District Court, Clark County, Nevada.

As alleged in the Complaint (*Edgeworth Family Trust, American Grating, Inc. v. Daniel S. Simon d/b/a Simon Law*, Case No. A-18-767242-C, filed January 4, 2018), the parties initially agreed that Mr. Simon would charge \$550.00 per hour for the representation. There was no written fee agreement. Complaint, ¶ 9. Toward the end of discovery, and on the eve of trial, the matter settled for \$6 million, an amount characterized in the Complaint as having "blossomed from one of mere property damage to one of significant and additional value." Complaint, ¶ 12.

On or about November 27, 2017, Mr. Simon sent a letter to Plaintiffs, setting forth

¹ The Nevada Rules of Professional Conduct ("RPC") did not enact the preamble and comments to the ABA Model Rules of Professional Conduct. However, Rule 1.0A provides in part that preamble and comments to the ABA Model Rules of Professional Conduct may be consulted for guidance in interpreting and applying the NRPC, unless there is a conflict between the Nevada Rules and the preamble or comments.

additional fees in an amount in excess of \$1 million. Complaint, ¶ 13. Thereafter, Mr. Simon was notified that the clients had retained Robert Vannah to represent them, as well. On December 18, 2017, Mr. Simon received two (2) checks from Zurich American Insurance Company, totaling \$6 million, and payable to "Edgeworth Family Trust and its Trustees Brian Edgeworth & Angela Edgeworth; American Grating, LLC, and the Law Offices of Daniel Simon."

That same morning, Mr. Simon immediately called and then sent an email to the clients' counsel requesting that the clients endorse the checks so they could be deposited into Mr. Simon's trust account. According to the email thread, in a follow up telephone call between Mr. Simon and Mr. Greene, Mr. Greene informed that the clients were unavailable to sign the checks until after the New Year. Mr. Simon informed Mr. Greene that he was available the rest of the week but was leaving town Friday, December 22, 2017, for a family vacation and not returning until the New Year.

In a reply email, Mr. Greene stated that he would "be in touch regarding when the checks can be endorsed." Mr. Greene acknowledged that Mr. Simon mentioned a dispute regarding the fee and requested that Mr. Simon provide the exact amount to be kept in the trust account until the dispute is resolved. Mr. Greene asked that this information be provided "either directly or indirectly" through Mr. Simon's counsel.

On December 19, 2017, Mr. Simon's counsel, James Christensen, sent an email indicating that Mr. Simon was working on the final bill but that the process might take a week or two, depending on holiday staffing. However, since the clients were unavailable until after the New Year, this discussion was likely moot.

On Saturday evening, December 23, 2017, Plaintiff's counsel, Robert Vannah, replied by email asking if the parties would agree to placing the settlement monies into an escrow account instead of Mr. Simon's attorney trust account. Mr. Vannah indicated that he needed to know "right after Christmas." Mr. Christensen replied on December 26, 2017, reiterating that Mr. Simon is out of town through the New Year and was informed the clients are, as well.

Mr. Vannah then replied the same day indicating that the clients are available before the end of the year, and that they will not sign the checks to be deposited into Mr. Simon's trust account. Mr. Vannah again suggested an interest-bearing escrow account. By letter dated December 27, 2017, Mr. Christensen replied in detail to Mr. Vannah's email, discussing problems with using an escrow account as opposed to an attorney's trust account.

I am informed that following the email and letter exchange, Mr. Simon provided an amended attorneys' lien dated January 2, 2018, for a net sum of \$1,977, 843.80 as the reasonable value for his services. Thereafter, the parties opened a joint trust account for the benefit of the clients on January 8, 2018. The clients endorsed the settlement checks for deposit. Due to the size of the checks, there was a hold of 7 business days, resulting the monies being available around January 18, 2018.

On January 4, 2018, Plaintiffs filed a Complaint in District Court, styled *Edgeworth Family Trust, American Grating, Inc. v. Daniel S. Simon d/b/a Simon Law*, Case No. A-18-767242-C (Complaint). The Complaint asserts claims for relief against Mr. Simon: breach of contract, declaratory relief, and conversion.

The breach of contract claim states:

25. SIMON's demand for additional compensation other than what was agreed to in the CONTRACT, and than what was disclosed to the defendants in the LITIGATION, in exchange for PLAINTIFFS to receive their settlement proceeds

is a material breach of the CONTRACT.

26. SIMON'S refusal to release all of the settlement proceeds from the LITIGATION to PLAINTIFFS is a breach of his fiduciary duty and a material breach of the contract.

27. SIMON'S refusal to provide PLAINTIFFS with either a number that reflects the undisputed amount of the settlement proceeds that PLAINTIFFS are entitled to receive or a definitive timeline as to when PLAINTIFFS can receive either the undisputed number or their proceeds is a breach of his fiduciary duty and a material breach of the CONTRACT.

As to the third claim for relief for conversion, the Complaint states:

43. SIMON'S retention of PLAINTIFF'S property is done intentionally with a conscious disregard of, and contempt for, PLAINTIFF'S property rights.

ANALYSIS AND OPINIONS.

Breach of Contract

All attorneys' fees that are contracted for, charged, and collected, must be reasonable.² An attorney may also face disciplinary investigation and sanction pursuant to the inherent authority of the courts for violating RPC 1.5 (Fees).³ As such, all attorney fees and fee agreements are subject to judicial review.

Nevada law grants to an attorney a lien for the attorney's fees even without a fee agreement,

A lien pursuant to subsection 1 is for the amount of any fee which has been agreed upon by the attorney and client. *In the absence of an agreement, the lien is for a reasonable fee for the services which the attorney has rendered for the client.*

NRS 18.015(2) (emphasis added).⁴ This statute provides for the mechanism to perfect the lien and for the court to adjudicate the rights and amount of the fee. The Rules of Professional Conduct direct the ethical attorney to comply with such procedures. "Law may prescribe a procedure for determining a lawyer's fee. . . . The lawyer entitled to such a fee and a lawyer representing another party concerned with the fee should comply with the prescribed procedure." Model R. Prof. Conduct 1.5 cmt 9 (ABA 2015).

² RPC 1.5(a) ("A lawyer shall not make an agreement for, charge, or collect an unreasonable fee or an unreasonable amount for expenses."); *see, also* Restatement (Third) of the Law Governing Lawyers §34 (2000) ("a lawyer may not charge a fee larger than is reasonable in the circumstances or that is prohibited by law.").

³ SCR 99, 101; *see, also* Restatement (Third) of the Law Governing Lawyers §42, cmt b(v) (2000) ("A court in which a case is pending may, in its discretion, resolved disputes between a lawyer and client concerning fees for services in that case. . . . Ancillary jurisdiction derives historically from the authority of the courts to regulate lawyers who appear before them.").

⁴ *See, also* Restatement (Third) of the Law Governing Lawyers §39 (2000) ("If a client and a lawyer have not made a valid contract providing for another measure of compensation, a client owes a lawyer who has performed legal services for the client the fair value of the lawyer's services").

In this instance, the fact that Mr. Simon has availed himself of his statutory lien right under Nevada law, a lien that attaches to every attorney-client relationship, regardless of agreement, cannot be a breach of contract. Mr. Simon is simply submitting his claim for services to judicial review, as the law not only allows, but requires.

In Nevada, “the plaintiff in a breach of contract action [must] show (1) the existence of a valid contract, (2) a breach by the defendant, and (3) damage as a result of the breach.”⁵ Here, there is neither breach nor damages arising from Mr. Simon’s actions. The parties cannot contract for fees beyond the review of the courts. Mr. Simon cannot even contract for an unreasonable fee, much less charge or collect one. Likewise, Plaintiff has an obligation to compensate Mr. Simon the fair value of his services.

By operation of law, NRS 18.015, and this court’s review, is an inherent term of the attorney-client fee arrangement, both with and without an express agreement. And, asserting his rights under the law, as encouraged by the Rules of Professional Conduct (“should comply with the prescribed procedure”) does not constitute a breach of contract. Moreover, as discussed below, under these facts, Plaintiffs cannot establish damages and the cause of action fails.

RPC 1.15 requires that the undisputed sum should be promptly disbursed. Based upon the facts as I know them, Mr. Simon has promptly secured the money in a trust account and promptly conveyed the amount of his claimed additional compensation on January 2, 2018, which is prior to the filing of the Complaint and prior to the funds becoming available for disbursement. Thus, Mr. Simon has complied with the requirements of RPC 1.15 and his actions do not support a claimed breach of contract on the alleged basis of delay in paragraphs 26 and 27 of the Complaint.

Conversion

RPC 1.15 (Safekeeping Property) addresses a lawyer’s duties when safekeeping property for clients or third-parties. It provides in pertinent part:

(a) A lawyer shall hold funds or other property of clients or third persons that is in a lawyer’s possession in connection with a representation separate from the lawyer’s own property. All funds received or held for the benefit of clients by a lawyer or firm, including advances for costs and expenses, shall be deposited in one or more identifiable bank accounts designated as a trust account maintained in the state where the lawyer’s office is situated, or elsewhere with the consent of the client or third person.

.

(e) When in the course of representation a lawyer is in possession of funds or other property in which two or more persons (one of whom may be the lawyer) claim interests, the property shall be kept separate by the lawyer until the dispute is resolved. The lawyer shall promptly distribute all portions of the funds or other property as to which the interests are not in dispute.

⁵*Saini v. Int'l Game Tech.*, 434 F.Supp.2d 913, 919–20 (D.Nev.2006) (citing *Richardson v. Jones*, 1 Nev. 405, 408 (1865)).

Normally, client settlement funds are placed in the attorney's IOLTA trust account (Interest On Lawyer's Trust Account) with the interest payable to the Nevada Bar Foundation to fund legal services. Supreme Court Rules (SCR) 216-221. However, these accounts are for "clients' funds which are nominal in amount or to be held for a short period of time." SCR 78.5(9).

In our case, the settlement amount is substantial and the parties have agreed to place the sums into a separate trust account with interest accruing to the clients. This action comports entirely with Supreme Court Rules:

SCR 219. Availability of earnings to client. Upon request of a client, when economically feasible, earnings shall be made available to the client on deposited trust funds which are neither nominal in amount nor to be held for a short period of time.

SCR 220. Availability of earnings to attorney. No earnings from clients' funds may be made available to a member of the state bar or the member's law firm except as disbursed through the designated Bar Foundation for services rendered.

Therefore, Plaintiff's settlement monies are both segregated from Mr. Simon's own funds in a designated trust account, interest accruing to the client, and, by Supreme Court rule, Mr. Simon cannot obtain any earnings.

Conversion has been defined as "a distinct act of dominion wrongfully exerted over another's personal property in denial of, or inconsistent with his title or rights therein or in derogation, exclusion, or defiance of such title or rights."⁶

At the time of the filing of the complaint, Mr. Simon had already provided the clients with the amount of his claimed charging lien. Further, at the time of the filing of the Complaint, the clients had not endorsed nor deposited the settlement checks. Even if the funds had cleared the account when the complaint was filed, the monies are still segregated from Mr. Simon's ownership and benefit. He has followed the established rules of the Supreme Court governing the safekeeping of such funds when there is a dispute regarding possession. There is neither conversion of these funds (either in principal or interest) nor damages to Plaintiffs.

Based upon the foregoing, it is my opinion that Mr. Simon's conduct in this matter fails to constitute a breach of contract or conversion of property belonging to Plaintiffs.

AMENDMENT AND SUPPLEMENTATION.

Each of the opinions set forth herein is based upon my personal review and analysis. This report is based on information provided to me in connection with the underlying case as reported herein. Discovery is on-going. I reserve the right to amend or supplement my opinions if further compelling information is provided to me to clarify or modify the factual basis of my opinions.

⁶ *M.C. Multi-Fam. Dev., L.L.C. v. Crestdale Associates, Ltd.*, 193 P.3d 536, 542-43 (Nev. 2008).

**INFORMATION CONSIDERED IN REVIEWING UNDERLYING
FACTS AND IN RENDERING OPINIONS.**

In reviewing this matter, and rendering these opinions, I relied on and/or reviewed the authorities cited throughout this report and the following materials:

Doc No.	Document Description	Date
1.	Complaint – (A-18-767242-C) <i>Edgeworth Family Trust, American Grating, Inc. v. Daniel S. Simon d/b/a Simon Law</i>	1/4/2018
2.	Letter from James R. Christensen to Robert D. Vannah, consisting of four (4) pages and referenced Exhibits 1 and 2, consisting of two (2) and four (4) pages, respectively.	12/27/2017
3.	Exhibit 1 to letter - Copies of two (2) checks from Zurich American Insurance Company, totaling \$6 million, and payable to “Edgeworth Family Trust and its Trustees Brian Edgeworth & Angela Edgeworth; American Grating, LLC, and the Law Offices of Daniel Simon	12/18/2017
4.	Exhibit 2 to letter - Email thread between and among Daniel Simon, John Greene, James R. Christensen, and Robert D. Vannah, consisting of four (4) pages	12/18/201– 12/26/2017
5.	Notice of Amended Attorneys Lien, filed and served in the case of <i>Edgeworth Family Trust and American Grating, LLC v. Lange Plumbing, LLC, The Viking Corp., et al.</i> , Case No. A738444-C	1/2/2018
6.	Deposition Transcript of Brian J. Edgeworth, in the case of <i>Edgeworth Family Trust and American Grating, LLC v. Lange Plumbing, LLC, The Viking Corp., et al.</i> , Case No. A738444-C	9/29/2017

BIOGRAPHICAL SUMMARY/QUALIFICATIONS.

Please see the attached curriculum vitae as Exhibit 1. Except as noted, I have no other publications within the past ten years.

OTHER CASES.

1. I was engaged and testified as an expert in:

Renown Health, et al. v. Holland & Hart, Anderson
Second Judicial District Court Case No. CV14-02049
Reno, Nevada

Report April 2016; Rebuttal Report June 2016

Deposition Testimony August 2016; Trial testimony October 2016

2. I was engaged and prepared a report in:

Marjorie Belsky, M.D., Inc. d/b/a Integrated Pain Specialists v. Keen Ellsworth, Ellsworth & Associates, Ltd. d/b/a Affordable Legal; Ellsworth & Bennion, Chld.
Case No. A-16-737889-C

Report December 2016.

COMPENSATION.

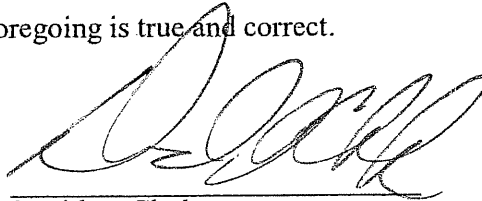
For this report, I charged an hourly rate is \$350.00.

DECLARATION

I am over the age of 18 and competent to testify to the opinions stated herein. I have personal knowledge of the facts herein based on my review of the materials referenced herein. I am competent to testify to my opinions expressed in this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 18, 2018

A handwritten signature in black ink, appearing to read 'David A. Clark', written over a horizontal line.

David A. Clark

David A. Clark

Lipson | Neilson

9900 Covington Cove Drive, Suite 120
Las Vegas, Nevada 89144-7052 (702) 382-1500 – office
(702) 382-1512 – fax
(702) 561-8445 – cell
dclark@lisponneilson.com

Biographical Summary

For 15 years, Mr. Clark was a prosecutor in the Office of Bar Counsel, culminating in five years as Bar Counsel. Mr. Clark prosecuted personally more than a thousand attorney grievances from investigation through trial and appeal, along with direct petitions to the Supreme Court for emergency suspensions and reciprocal discipline. Two of his cases resulted in reported decisions, *In re Discipline of Droz*, 123 Nev. 163, 160 P.3d 881 (2007) and *In re Discipline of Lerner*, 124 Nev. 1232, 197 P.3d 1067 (2008).

Mr. Clark established the training regimen and content for members of the Disciplinary Boards, which hears discipline prosecutions. He proposed and obtained numerous rule changes to Nevada Rules of Professional Conduct and the Supreme Court Rules governing attorney discipline. He drafted the first-ever Discipline Rules of Procedure that were adopted by a task force and the Board of Governors in July 2014.

Mr. Clark has presented countless CLE-accredited seminars on all aspects of attorney ethics for the State Bar of Nevada, the Clark County Bar Assn., the National Organization of Bar Counsel (NOBC), the National Assn. of Bar Executives (NABE), and the Association of Professional Responsibility Lawyers (APRL). He has spoken on ethics and attorney discipline before chapters of paralegal groups and SIU fraud investigators, as well as in-house for the Nevada Attorney General's office and the Clark County District Attorney.

Mr. Clark received his Juris Doctor from Loyola Law School of Los Angeles following a B.S. in Political Science from Claremont McKenna College. He is admitted in Nevada and California (inactive), the District of Nevada, the Central District of California, the Ninth Circuit Court of Appeals, and the United States Supreme Court.

Work Experience

August 2015 - present

Lipson | Neilson

9900 Covington Cove Drive, Suite 120
Las Vegas, Nevada 89144-7052
Partner

November 2000 –
July, 2015

**Office of Bar Counsel
State Bar of Nevada**

January 2011 -
July 2015

Bar Counsel

May 2007 -
December 2010

Deputy Bar Counsel/
General Counsel to Board of Governors

April 2010 -
September 2010

Acting Director of Admissions

January 2007 -
May 2007

Acting Bar Counsel

November 2000 -
December 2006

Assistant Bar Counsel

May 1997 –
October 2000

Stephenson & Dickinson
Litigation Associate Attorney

November 1996 -
May 1997

Earley & Dickinson
Litigation Associate Attorney

April 1995 -
August 1996

Thorndal, Backus, Armstrong & Balkenbush
Litigation Associate Attorney

May 1992 -
March 1995

Brown & Brown
Associate Attorney

September 1990 -

Gold, Marks, Ring & Pepper (California) March 1992
Litigation Associate Attorney

Education

1987 - 1990

Loyola of Los Angeles Law School
Juris Doctor

1980 – 1985

Claremont McKenna College (CA) *B.S., Political Science*

Expert Retention and Testimony

1. *Renown Health, et al. v. Holland & Hart, Anderson*
Second Judicial District Court Case No. CV14-02049
Reno, Nevada

Report April 2016; Rebuttal Report June 2016
Deposition Testimony August 2016; Trial testimony October 2016

2. *Marjorie Belsky, M.D., Inc. d/b/a Integrated Pain Specialists v. Keen Ellsworth, Ellsworth & Associates, Ltd. d/b/a Affordable Legal; Ellsworth & Bennion, Chtd.*
Case No. A-16-737889-C

Report December 2016.

Reported Decisions

In re Discipline of Droz, 123 Nev. 163, 160 P.3d 881 (2007) (Authority of Supreme Court to discipline non-Nevada licensed attorney).

In re Discipline of Lerner, 124 Nev. 1232, 197 P.3d 1067 (2008) (Only third Nevada case defining practice of law).

Recent Continuing Legal Education Taught

Office of Bar Counsel 2011 – 2015	Training of New Discipline Board members (twice yearly)
2011 SBN Family Law Conf. March 2011	Ethics and Malpractice
2011 State Bar Annual Meeting June 2011	Breach or No Breach: Questions in Ethics
Nevada Paralegal Assn./SBN April 2012	Crossing the UPL Line: What Attorneys Should Not Delegate to Assistants
2012 State Bar Annual Meeting July 2012	Lawyers and Loan Modifications: Perfect Storm or Perfect Solution
State Bar Ethics Year in Review December 2012	How Not to Leave a Firm
State Bar of Nevada June 2013	Ethics in Discovery
2013 State Bar Annual Meeting July 2013	Practice like an Attorney, not a Respondent

	Ethical Issues in Law Practice Promotion (Advertising)
	Going Solo: Building and Marketing Your Firm
Nevada Attorney General December 2013	Civility and Professionalism
Clark County Bar Assn. June 2014	Legal Ethics: Current Trends
UNLV Boyd School of Law July 2014	Discipline Process
2014 NV Prosecutors Conf. September 2014	Unauthorized Practice of Law
State Bar of Nevada November 2014	Let's Be Blunt: Ethics of Medical Marijuana
State Bar Ethics Year in Review December 2014	Ethics, civility, discipline process
LV Valley Paralegal Assn. Annual Meeting, April 2015	Paralegal Ethics
UNLV Boyd SOL May 2015	Navigating the Potholes: Attorney Ethics of Medical Marijuana
Assn. of Professional Responsibility Lawyers (APRL) February 2016 Mid-Year Mtg.	Patently different? Duty of Disclosure under USPTO and State Law (Panel member)
The Seminar Group July 2017	Medical & Recreational Marijuana in Nevada
State Bar of Nevada SMOLO Institute October 2017	Attorney-Client Confidentiality

Press Appearances

May 8, 2014 Channel 3 (Las Vegas)	Ralston Report. Ethics of attorneys owning medical marijuana businesses.
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Practice Areas

Insurance and Commercial Litigation, Legal Malpractice, Ethics, Discipline Defense.

Exhibit 23

LAW OFFICE OF
DANIEL S. SIMON
A PROFESSIONAL CORPORATION
810 SOUTH CASINO CENTER BOULEVARD
LAS VEGAS, NEVADA 89101

TELEPHONE (702)364-1650

FACSIMILE (702)364-1655

CURRICULUM VITAE

NAME: Daniel S. Simon

OFFICE ADDRESS: 810 S. Casino Center Blvd.
Las Vegas, Nevada 89101

OFFICE PHONE: (702) 364-1650

OFFICE FAX: (702) 364-1655

SCHOLASTIC BACKGROUND:

UNDERGRADUATE: Arizona State University
(Business and Marketing Degree -1988)

LAW SCHOOL: Whittier College School of law
(Juris Doctor Degree - 1992)

OTHER: University of San Diego School of Law
Institute On International And
Comparative Law, Oxford, England

LEGAL EXPERIENCE: May 1, 1995 - Present
Law Office of Daniel S. Simon

Specializing in all personal injury matters, including motor vehicle accidents, workers compensation, premises liability, products liability, medical malpractice, and catastrophic injuries.

October 1992 through April, 1995
Greenman, Goldberg, Raby & Martinez,
Associate

Specializing in all personal injury matters, including motor vehicle accidents, workers compensation, premises liability, products liability, medical malpractice, and catastrophic injuries.

January, 1992 through April, 1992
Beverly Hills Bar Association,
Lawyer Referral Service

June, 1991 through August, 1991
U.S. Attorney, Organized Crime
Division, Civil Division

**PROFESSIONAL
ASSOCIATIONS/MEMBERSHIPS:**

Clark County Bar Association,
American Bar Association,
Nevada American Inn of Court
Nevada Justice Association
State Bar of Nevada
Citizens for Justice
Super Lawyers 2014

Personal Profile

I am born and raised in Las Vegas.. My parents have been involved in the community for 50 years as business and property owners. I have operated my own law practice for 26 years.

1 JAMES R. CHRISTENSEN, ESQ.
Nevada Bar No. 3861
2 601 S. 6th Street
Las Vegas, Nevada 89101
3 (702) 272-0406
(702) 272-0415 fax
4 jim@christensenlaw.com
Attorney for Simon

5
6 **EIGHTH JUDICIAL DISTRICT COURT**
7
8 **DISTRICT OF NEVADA**

9 EDGEWORTH FAMILY TRUST and
AMERICAN GRATING, LLC,

10 Plaintiffs,

11 vs.

12 LANGE PLUMBING, LLC; THE VIKING
CORPORATION; a Michigan corporation;
13 SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES I through 5 and ROE entities 6 through
14 10;

15 Defendants.

CASE NO.: A738444

DEPT NO.: X

DECLARATION OF WILL KEMP, ESQ.

16 1. I have been a licensed attorney in the State of Nevada since September, 1978. I
17 have litigated high profile products liability cases in Nevada and around the country. I have presented
18 arguments before all the courts in the state of Nevada, as well as the First, Third and Ninth Circuit
19 Court of Appeals and the United States Supreme Court. I have been an AV Preeminent Lawyer by
20 Martindale Hubbell since the 1980's, which is the highest AV rating for competency and ethics. I have
21 also been named as a Super Lawyer, named in the Mountain States Top 10, selected in the Legal Elite
22 of Nevada Business Magazine and selected as Nevada Trial Lawyer of the year in 2012.

23 I have served on multiple steering committees, including but not limited to Plaintiffs' Legal
24 Committee, MGM Multi-District Fire Litigation, 1980-1987, (the seminal mass tort case in Nevada)
25 Plaintiffs' Steering Committee and Plaintiffs' Trial Counsel, San Juan Dupont Plaza Multi-District Fire
26 Litigation, 1987-98, Plaintiffs' Steering Committee, Peachtree 25th Fire Litigation, 1991-94, Plaintiffs'
27 Steering Committee and Executive Committee in Castano Tobacco Litigation, 1993-2010, Orthopedic
28 Bone Screw Products Liability Litigation, 1994-1998, Plaintiff's Management Committee, Fen/Phen

WA00483

1 Diet Drug Litigation, 1998-2003 (the largest pharmaceutical settlement in history--\$25 Billion plus),
2 Plaintiffs' Steering Committee, Baycol Products Liability Litigation, 2002-07, Minnesota Syngenta
3 Litigation State Court Committee (2016-____) (\$1.3 Billion settlement pending). I was the Liaison
4 Counsel for Plaintiffs and lead attorney on the product liability committee of Plaintiffs' Legal
5 Committee in the MGM Fire Litigation. I have tried numerous complex product liability cases,
6 including the San Juan Dupont Plaza Multi-District Fire Litigation (15 ½ month product liability case
7 against 200 Defendants resulting in plaintiffs' verdict). I was also lead counsel on the largest product
8 liability verdict in the history of Nevada: \$505 Million verdict in Chanin v. Teva in 2010 (defective
9 propofol packaging theory).

10 2. In connection with many of the foregoing cases, I have presented the work effort
11 of our firm to multiple state and federal courts in fee presentations. In addition, I was on the Fee
12 Committee in the Castano Tobacco Litigation and decided on the allocation of a \$1.3 Billion fee among
13 57 law firms based upon their relative efforts in that landmark litigation.

14 3. In my practice, I have represented both plaintiffs and defendants in all types of litigation,
15 including negligence cases and product liability. I am personally familiar with the efforts required to
16 both prosecute and defend serious cases in general, including hotly contested product liability litigation
17 against a worldwide manufacturer.

18 4. I have been retained by the Law Office of Daniel Simon (hereinafter LODS) to review
19 the case of Edgeworth Family Trust and American Grating v. Lange Plumbing and the Viking entities,
20 hereinafter "The Edgeworth Matter." In preparing my opinion, I have reviewed the register of actions;
21 the e-service filings, pleadings, motions, the relevant court orders; voluminous e-mails, the list of
22 depositions taken, notices of depositions, extensions of discovery in other LODS cases and expert
23 reports. I have a qualified understanding of the work performed on this case and the results achieved.

24 5. I am also aware of the billing statements produced to the client in this case and the
25 payments that were made for these billing statements.

26 6. Before the mediation that occurred on November 10, 2017, LODS filed numerous
27 motions that effectively forced the Viking entities to settle this matter prior to any rulings on the
28 pending motions. At the time of mediation, the Trial Judge, the Honorable Tierra Jones had already set

1 an evidentiary hearing to occur in December 2017 in order to determine whether Viking's answer
2 should be stricken for discovery abuses or other sanctions. Notably, the motion for to Strike Answer
3 was filed on September 29, 2017, after Mr. Edgeworth commented in the August 22, 2017 email set
4 forth below that no one expected "this case would meet the hurdle of punitives" and proposed a hybrid
5 "that incents" LODS to vigorously pursue punitives. The Trial was set for February 5, 2018. The
6 Motion to Strike Answer was obviously one of the key threats that coerced the settlement.

7 7. At the same time, LODS also had pending motions for summary judgment against Lange
8 Plumbing. Lange Plumbing had cross-claims against the Viking entities.

9 8. The case was worked up with many experts consisting of several engineering experts, an
10 appraiser to establish damages, litigation loan experts to justify non-recourse interest on loans and a
11 fraud expert. The defense hired many experts that needed to be rebutted.

12 9. The document production was voluminous and consisted of more that 100,000 pages,
13 there was substantial motion work and the emails with the client show continuous communication to an
14 extent that is relatively unusual. This close communication with the client on a daily (if not more) basis
15 obviously took much attention from LODS but appears to have been productive in multiple ways.

16 10. I have reviewed the email dated November 21, 2017, that Mr. Edgeworth sent to
17 Mr. Simon setting forth damage elements. The amounts discussed in that email that I would consider to
18 be "hard" damages were \$512,636 paid for repairs to the damaged house, \$24,117 (repairs owed) and
19 \$194,489 (still to repair). This totals \$731,242 of "hard" damages. The other damages items such as
20 "stigma" for \$1,520,000 and the interest of \$285,104 are what I would consider "soft" damages. In
21 evaluating the value of a case, many attorneys give more credence to "hard" damages.

22 11. I have also reviewed the email dated August 22, 2017 from Mr. Edgeworth to Mr
23 Simon wherein Mr. Edgeworth states as follows:

24 **We never really had a structured discussion about how this might be done. I am**
25 **more that happy to keep paying hourly but if we are going for punitive we should**
26 **probably explore a hybrid of hourly on the claim and then some other structure that**
incents both of us to win an[d] go after the appeal that these scumbags will file etc.

27 **Obviously that could not have been done earlier since who would have thought this**
case would meet the hurdle of punitives at the start.

28 I could also swing hourly for the whole case (unless I am off what this is going to cost).

1 I would likely borrow another \$450k from Margaret in 250 and 200 increments and then
2 either I could use one of the house sales for cash or if things get really bad, I still have a
couple million in bitcoin I could sell.

3 I doubt we will get Kinsale [the insurer for Lange Plumbing] to settle for enough to
4 really finance this since I would have to pay the first \$750,000 or so back to Colin and
Margaret and why would Kinsale settle for \$1MM when their exposure is only \$1MM?

5 (Bold added) The August 22, 2017 email is significant for several reasons. First, as discussed in more
6 detail, the settlement had to have included at least \$3.3 Million of punitive damages and more likely \$4
7 or \$5 Million of punitive damages because the \$6.1 Million settlement is \$5,368,580 above the "hard"
8 damages of \$731,420.00 and \$2,272,855 above the total damages of \$3,827,147 (as set forth in the
9 November 21, 2017 email). It should be noted that the \$3,827,147 figure includes \$1,520,000 for
10 "stigma" to the house damages (of which there is not strong legal support). Under any view, the
11 settlement included millions of dollars of punitive damages. It is unprecedented to get that much in
12 punitive damages in a case of this nature where only property damage is involved. Indeed, some courts
13 would hold that a 5 to 1 ratio (\$5 Million punitive to \$1M compensatory) is unconstitutionally
14 excessive.

15 12. The second reason that the August 22, 2017 email is significant is that, Mr.
16 Edgeworth acknowledges that he does not believe that the parties have a fee agreement ("We never
17 really had a structured discussion about how this might be done.") and then proposed "a hybrid" fee
18 arrangement "if we are going for punitive." Not only did Mr. Edgeworth and LODS "go for punitive"
19 after August 22, 2017, they got millions of dollars in punitives. Mr. Edgeworth also explains why a fee
20 agreement to pursue the punitives could not be made earlier ("Obviously that could not have been done
21 earlier since who would have thought this case would meet the hurdle of punitives at the start.") Given
22 the volume of the emails between Mr. Edgeworth and LODS between this August 22, 2017 and the
23 mediation, it appears that a herculean (and successful) effort was made to "go for punitive."

24 13. The third reason that the August 22, 2017 email is significant is that Mr.
25 Edgeworth expresses the firm opinion therein that the only way to obtain satisfactory resolution of his
26 claim is to succeed at trial and then succeed on appeal: "some other structure that incents both of us to
27 win [at trial] and go after the appeal that these scumbag [Defendants] will file..." Mr. Edgeworth is
28 obviously a very sophisticated client (based on a review of his emails to LODS) and his general

1 expectation that the usual course to an adequate recovery would be years of litigation and success at
2 trial and appeal is consistent with what could typically occur. This will be referred to later as
3 "Edgeworth's expected result."

4 14. I have been informed and believe that, at the mediation on November 10th, 2017, the
5 parties could not reach a settlement. Viking offered \$2.5 Million. The Mediator, Floyd Hale, requested
6 to send a mediator proposal for \$5 million. LODS only agreed to a mediator proposal of \$6 million.
7 Subsequently, on November 15, 2017, Viking accepted the \$6 million proposal, subject to a
8 determination of a good faith settlement extinguishing the claims Lange Plumbing has against Viking
9 and a confidentiality provision. Later, LODS was able to negotiate better terms, including a mutual
10 release and omitting the confidentiality provision.

11 15. I am familiar with NRPC 1.5, and the Brunzell Factors that control Nevada law. See
12 Brunzell v. Golden Gate National Bank, 85 Nev. 345, 349 455 P.2d 31, 33 (Nev. 1969) ("From a study
13 of the authorities it would appear such factors may be classified under four general headings (1) the
14 qualities of the advocate: his ability, his training, education, experience, professional standing and skill;
15 (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill
16 required, the responsibility imposed and the prominence and character of the parties where they affect
17 the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and
18 attention given to the work; (4) the result: whether the attorney was successful and what benefits were
19 derived.") I am also familiar with the detailed analysis of the Lodestar approach for determining a
20 reasonable attorney fee in the absence of a contract with the client. I have also argued fee dispute issues
21 at the First Circuit Court of Appeals. See In re Thirteen Appeals Arising Out of the San Juan Dupont
22 Hotel Fire Litigation, 56 F.3d 295, 307 (1st Cir. 1995) (approving the percentage of fund method for
23 mass tort cases instead of the lodestar technique); In re Nineteen Appeals Arising Out of The San Juan
24 Dupont Plaza Hotel Fire Litigation (1st Cir. 1992).

25 16. An attorney who does not have a signed contract with a client is entitled to receive a
26 reasonable attorneys fee for the value of his/her services. There are many factors to consider in
27 determining the value of an attorneys services. To determine reasonableness, Nevada state courts rely
28 heavily on the "Brunzell factors." The state court decisions applying the Brunzell factors suggest that

1 the analysis focuses primarily on the quantity, quality of work and advocacy rather than the hourly rate.
2 NRCP 1.5 lists eight non-exclusive factors to consider. One of the primary factors is the fees
3 "customarily charged in the locality for similar legal services."

4 17. The Edgeworth matter involved one house that was heavily damaged by flooding
5 due to a defective sprinkler. This type of case, i.e., one client with property damage, is not attractive to
6 most experienced product liability litigators for several reasons. First, the amount of energy involved in
7 litigating a complex product case usually requires multiple clients (or at a minimum serious personal
8 injury) to justify the time expended to obtain an award. Second, product liability is a legal concept that
9 is not familiar to many jurors (and even some judges). This creates an element of uncertainty in
10 predicting liability outcomes that is greater than most garden variety negligence cases. Third, property
11 damage typically does not invoke sympathy with jurors needed to drive a punitive award. Fourth, no
12 experienced litigator will take a case wherein punitive damages are the primary damages element
13 because punitive damages are rarely awarded and paid even less often.

14 18. For these reasons, despite expertise in both product liability and construction
15 defect litigation, our office probably would have not have taken this case for the reasons outlined above.
16 If we had taken the case, the minimum contingent fee would have been 40% and more likely 45%. A
17 settlement of \$6.1 Million in a complex product liability case with no personal injury or death and only
18 \$731,242 in "hard costs" is truly remarkable.

19 19. When reviewing the Edgeworth matter to determine a reasonable fee, the analysis must
20 start with the fourth Brunzell factor; the result achieved. As set forth in Paragraph 13 above, Mr.
21 Edgeworth, a sophisticated client, expressed the opinion on August 2, 2017, that it would take a trial
22 and appeal to get "Edgeworth's expected result." Given how involved Mr. Edgeworth was with the
23 case (including minute details) and that he is a very sophisticated client, his belief in this regard would
24 normally be correct. Indeed, most lawyers would agree that it would take years to even get the "hard
25 costs." But instead of getting "Edgeworth's expected result" after years of litigation, LODS got a truly
26 extraordinary result in less than 3 months after the date of the August 2, 2017 email. LODS secured a
27 six million, one hundred thousand dollar (\$6,100,000) settlement for a complex products liability case
28 where the "hard" damages were only \$791,242.00. The total claimed past "hard" and "soft" damages

1 involved, excluding attorney's fees, experts fees and costs were approximately \$1.5 million dollars.
2 Getting millions of dollars of punitives in a settlement in a case of this nature is remarkable. For these
3 reasons, the fourth Brunzell factor (result) overwhelmingly favors a large fee.

4 20. The quality and quantity of the work (the third Brunzell factors) were exceptional for a
5 products liability case against a worldwide manufacturer that is very experienced in litigating cases.
6 LODS had to advocate against several highly experienced law firms for Viking, including local and out
7 of state counsel. In this regard, the Motion to Strike Answer filed on September 29, 2017 is of utmost
8 significance.

9 21. LODS retained multiple experts to secure the necessary opinions to prove the case. It
10 also creatively advocated to pursue unique damages claims (e.g., the "stigma" damages) and to
11 prosecute a fraud claim and file many motions that most lawyers would not have done. LODS also
12 secured rulings that most firms handling this case would not have achieved. The continued aggressive
13 representation prosecuting the case was a substantial factor in achieving the exceptional results. This
14 (especially the Motion to Strike Answer and impending evidentiary hearing) is the second Brunzell
15 factor.

16 22. I am familiar with the size of the LODS firm and the amount of work performed would
17 have significantly impaired LODS from simultaneously working on other cases. Our firm has over a
18 dozen litigators and a long track record of successful litigation and we often find it difficult to support a
19 "hot" products case (i.e., one requiring the full time attention of several lawyers). It is very impressive
20 that a small firm made the sacrifice to do so.

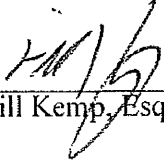
21 23. LODS does not represent clients on an hourly basis and the fee customarily charged in
22 the locality for similar legal services should be substantial in light of the work actually performed, the
23 LODS lost opportunities to work on other cases and the ultimate amazing result achieved. Absent a
24 contract, LODS is entitled to a reasonable fee customarily charged in the community based on the
25 services performed.

26 24. When evaluating the novelty and difficulty of the questions presented; the adversarial
27 nature of this case, the skill necessary to perform the legal service, the lost opportunities to work on
28 other cases, the quality, quantity and the advocacy involved, as well as the exceptional result achieved

1 given the total amount of the settlement compared to the "hard" damages involved, the reasonable value
2 of the services performed in the Edgeworth matter by LODS, in my opinion, would be in the sum of
3 \$2,440,000. This evaluation is reasonable under the Brunzell factors.

4 25. I make this Declaration under penalty of perjury.

5 Dated this 31st day of January, 2018.

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9 Will Kemp, Esq.
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AFFIDAVIT OF BRIAN EDGEWORTH IN SUPPORT OF PLAINTIFFS' OPPOSITIONS TO
DEFENDANT'S MOTIONS

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, BRIAN EDGEWORTH, do hereby swear, under penalty of perjury, that the assertions
of this Affidavit are true and correct:

1. I am over the age of twenty-one, and a resident of Clark County, Nevada.

2. I have lived and breathed this matter since April of 2016 through the present date,
and I have personal knowledge of the matters stated herein.

3. On or about May 27, 2016, I, on behalf of PLAINTIFFS, retained SIMON to
represent our interests following a flood that occurred on April 10, 2016, in a home under
construction that was owned by PLAINTIFFS.

4. The damage from the flood caused in excess of \$500,000 of property damage to
the home. It was initially hoped that SIMON drafting a few letters to the responsible parties
could resolve the matter, but that wasn't meant to be. We were forced to litigate to get the
defendants to do the right thing and pay the damages

5. When it became clear the litigation was likely, I had options on who to retain.
However, I asked SIMON if he wanted to represent PLAINTIFFS. In his Motion, SIMON seems
to liken our transaction as an act of charity performed by him for a friend = me. Hardly.
Agreeing to pay and receive \$550 per hour is a business agreement, not an act of charity. Also,
those "few letters" mentioned above were not done for free by SIMON, either. I believe I paid
approximately \$7,000 in hourly fees to SIMON for his services for these tasks alone.

6. At the outset of the attorney-client relationship, SIMON and I orally agreed that
SIMON would be paid for his services by the hour and at an hourly rate of \$550 and that we'd

1 reimburse him for his costs. No other form or method of compensation such as a contingency fee
2 was ever brought up at that time, let alone agreed to.

3 7. The terms of our fee agreement were never reduced to writing. However, that
4 formality didn't matter to us, as we each recognized what the terms of the agreement were and
5 performed them accordingly. For example, SIMON billed us at an hourly rate of \$550, his
6 associate billed us at \$275 per hour, costs incurred were billed to us, and I paid SIMON all of the
7 invoices in full in less than one week from the date they were received.
8

9 8. For example, SIMON sent invoices to me dated December 16, 2016, May 3, 2017,
10 August 16, 2017, and September 25, 2017. The amount of fees and costs SIMON billed us in
11 those invoices totaled \$486,453.09. The hourly rate that SIMON billed us in all of his invoices
12 was at \$550 per hour. I paid the invoices in full to SIMON. He also submitted an invoice to us
13 on November 10, 2017 in the amount of approximately \$72,000. However, SIMON withdrew the
14 invoice and failed to resubmit the invoice to us, despite an email request from me to do so. I
15 don't know whether SIMON ever disclosed that "final" invoice to the defendants in the
16 LITIGATION or whether he added those fees and costs to the mandated computation of damages.
17

18 9. From the beginning of his representation of us, SIMON was aware that I was
19 required to secure loans to pay SIMON'S fees and costs in the LITIGATION. SIMON was also
20 aware that these loans accrued interest. It's not something for SIMON to gloat over or question
21 my business sense about, as I was doing what I had to do to with the options available to me. On
22 that note, SIMON knew that I could not get traditional loans to pay SIMON'S fees and costs.
23

24 10. Plus, SIMON didn't express an interest in taking what amounted to a property
25 damage claim with a value of \$500,000 on a contingency basis. Easy math shows that 40% of
26 \$500,000 is \$200,000. SIMON billed over twice that in fees in the invoices that he disclosed in
27 the LITIGATION. I believe that in my conversations and dealings with SIMON, he only wanted
28

WA00492

1 what amounts to a bonus after he'd received \$500,000 in fees and costs from me and after the risk
2 of loss in the LITIGATION was gone.

3 11. Please understand that I was incredibly involved in this litigation in every respect.
4 Regrettably, it was and has been my life for nearly 22 months. As discovery in the underlying
5 LITIGATION neared its conclusion in the late fall of 2017, after the value of the case blossomed
6 from one of property damage of approximately \$500,000 to one of significant and additional
7 value do to the conduct of one of the defendants, and after a significant sum of money was offered
8 to PLAINTIFFS from defendants, SIMON became determined to get more, so he started asking
9 me to modify our CONTRACT. Thereafter, I sent an email labeled "Contingency." The purpose
10 of that email was to make it clear to SIMON that we'd never had a structured conversion about
11 modifying the existing fee agreement from an hourly agreement to a contingency agreement.
12

13 12. SIMON scheduled an appointment for my wife and I to come to his office to
14 discuss the LITIGATION. Instead, his only agenda item was to pressure us into modifying the
15 terms of the CONTRACT. He told us that he wanted to be paid far more than \$550.00 per hour
16 and the \$486,453.09 he'd received from us for the preceding eighteen (18) months. The timing of
17 SIMON'S request for our fee agreement to be modified was deeply troubling to us, too, for it
18 came at the time when the risk of loss in the LITIGATION had been nearly extinguished and the
19 appearance of a large gain from a settlement offer had suddenly been recognized. SIMON put on
20 a full court press for PLAINTIFFS to agree to his proposed modifications to our fee agreement.
21 We really felt that we were being blackmailed by SIMON, who was basically saying "agree to
22 this or else."
23
24

25 13. Following that meeting, SIMON would not let the issue alone, and he was
26 relentless to get us to agree to pay him more. Despite SIMON'S persistent efforts, we never
27 agreed on any terms to alter, modify, or amend our fee agreement. Knowing SIMON as I do, if
28

WA00493

1 we had agreed to modify our fee agreement, SIMON would have attached that agreement in large
2 font to his Motion as Exhibit 1.

3 14. On November 27, 2017, SIMON sent a letter to us setting forth additional fees in
4 the amount of \$1,114,000.00, and costs in the amount of that \$80,000.00, that he wanted to be
5 paid in light of a favorable settlement that was reached with the defendants in the LITIGATION.
6 We were stunned to receive this letter. At that time, these additional “fees” were not based upon
7 invoices submitted to us or detailed work performed. The proposed fees and costs were in
8 addition to the \$486,453.09 that we had already paid to SIMON pursuant to the fee agreement, the
9 invoices that SIMON had presented to us, the evidence that we understand SIMON produced to
10 defendants in the LITIGATION, and the amounts set forth in the computation of damages that
11 SIMON was required to submit in the LITIGATION.
12

13 15. A reason given by SIMON to modify the fee agreement was that he purportedly
14 under billed us on the four invoices previously sent and paid, and that he wanted to go through his
15 invoices and create, or submit, additional billing entries. We were again stunned to learn of
16 SIMON’S reasoning. According to SIMON, he under billed in the LITIGATION in an amount in
17 excess of \$1,000,000.00. An additional reason given then by SIMON was that he felt his work
18 now had greater value than the \$550.00 per hour that was agreed to and paid for. SIMON
19 prepared a proposed settlement breakdown with his new numbers and presented it to us for their
20 signatures. This, too, came with a high-pressure approach by SIMON.
21

22 16. Another reason why we were so surprised by SIMON’S demands is because of the
23 nature of the claims that were presented in the LITIGATION. Some of the claims were for breach
24 of contract and indemnity, and a part of the claim for indemnity against Defendant Lange was the
25 fees and costs we were compelled to pay to SIMON to litigate and be made whole following the
26 flooding event. Since SIMON hadn’t presented these “new” damages to defendants in the
27
28

WA00494

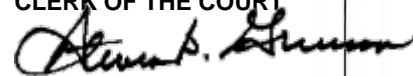
1 LITIGATION in a timely fashion, we were savvy enough to know that they would not be able to
2 be presented at trial.

3 17. On September 27, 2017, I sat for a deposition on September 27, 2017.
4 Defendants' attorneys asked specific questions of me regarding the amount of damages that
5 PLAINTIFFS had sustained, including the amount of attorneys fees and costs that had been paid
6 to SIMON. Not only do I remember what transpired, I've since reviewed the transcript, as well.
7 At page 271 of that deposition, a question was asked of Mr. Edgeworth as to the amount of
8 attorneys' fees that PLAINTIFFS had paid to SIMON in the LITIGATION prior to May of 2017.
9 At lines 18-19, SIMON interjected: "They've all been disclosed to you." At lines 23-25, SIMON
10 further stated: "The attorneys' fees and costs for both of these plaintiffs as a result of this claim
11 have been disclosed to you long ago." Finally, at page 272, lines 2-3, SIMON further admitted
12 concerning his fees and costs: "And they've been updated as of last week." At that time, I felt I
13 had reason to believe SIMON that he'd done everything necessary to protect PLAINTIFFS claims
14 for damages in the LITIGATION.
15

16 18. Despite SIMON'S requests and demands on us for the payment of more in fees, we
17 refused to alter or amend the terms of the fee agreement. When we refused to alter or amend the
18 terms of the fee agreement, SIMON refused to agree to release the full amount of our settlement
19 proceeds. Instead, he served two attorneys liens and reformulated his billings to add entries and
20 time that he'd never previously produced to us and that never saw the light of day in the
21 LITIGATION.
22

23 19. When SIMON refused to release the full amount of the settlement proceeds to us,
24 we felt that the only reasonable alternative available to us was to file a complaint for damages
25 against SIMON. We did not do so to shop around for a new judge. It was nothing like that. In my
26 mind, by the time we filed our complaint, all of the claims from the LITIGATION were resolved
27 and only one release had to be signed, then the entire case could be dismissed.
28

WA00495



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Facsimile: (702) 369-0104
Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

--o0o--

EDGEWORTH FAMILY TRUST; AMERICAN
GRATING, LLC,

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan corporation; and
DOES I through V and ROE CORPORATIONS
VI through X, inclusive,

Defendants.

EDGEWORTH FAMILY TRUST; AMERICAN
GRATING, LLC,

Plaintiffs,

vs.

DANIEL S. SIMON, d/b/a SIMON LAW; DOES
I through X, inclusive, and ROE
CORPORATIONS I through X, inclusive,

Defendant.

CASE NO.: A-16-738444-C
DEPT. NO.: X

**PLAINTIFFS OPPOSITIONS TO
DEFENDANT'S MOTIONS TO
CONSOLIDATE AND TO
ADJUDICATE ATTORNEY LIEN**

CASE NO.: A-18-767242-C
DEPT. NO.: XXIX

Date of Hearing: February 6, 2018
Time of Hearing: 9:30 a.m.

///

VANNAH & VANNAH
400 S. Seventh Street, 4th Floor • Las Vegas, Nevada 89101
Telephone (702) 369-4161 Facsimile (702) 369-0104

1 Plaintiffs EDGEWORTH FAMILY TRUST and AMERICAN GRATING, LLC
2 (PLAINTIFFS), by and through his attorneys of record, ROBERT D. VANNAH, ESQ., and
3 JOHN B. GREENE, ESQ., of the law firm VANNAH & VANNAH, hereby files this Opposition
4 to the Motions of DANIEL S. SIMON, ESQ., dba SIMON LAW (SIMON) to Consolidate and to
5 Adjudicate Attorney Lien (the Motions).

6 This Opposition is based upon NRS 18.015, the attached Memorandum of Points and
7 Authorities, the pleadings and papers on file herein, and any oral argument this Court may wish to
8 entertain.

9
10 DATED this 2 day of February, 2018.

11
12 VANNAH & VANNAH

13 
14 ROBERT D. VANNAH, ESQ.

15
16 I.

17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 On or about May 27, 2016, PLAINTIFFS retained SIMON to represent their interests
19 following a flood that occurred on April 10, 2016, in a home under construction that was owned
20 by PLAINTIFFS. (Please see Affidavit of Brian Edgeworth attached to this Opposition as
21 Exhibit 1.) The damage from the flood caused in excess of \$500,000 of property damage to the
22 home. It was initially hoped that SIMON drafting a few letters to the responsible parties could
23 resolve the matter, but that wasn't meant to be. Thereafter, that dispute was subject to litigation
24 in the 8th Judicial District Court as Case Number A-16-738444-C (the LITIGATION), with a
25 trial date of January 8, 2018. A settlement in favor of PLAINTIFFS for a substantial amount of
26 money was reached with defendants not long before the trial date.
27
28

WA00498

1 At the outset of the attorney-client relationship, PLAINTIFFS and SIMON orally agreed
2 that SIMON would be paid for his services by the hour and at an hourly rate of \$550. (Id.). No
3 other form or method of compensation such as a contingency fee was ever brought up at that
4 time, let alone agreed to. (Id.) Despite SIMON serving as the attorney in this business
5 relationship, and the one with the requisite legal expertise, SIMON never reduced the terms of
6 the CONTRACT to writing in the form of a Fee Agreement. However, that formality didn't
7 matter to the parties as they each recognized what the terms of the CONTRACT were and
8 performed them accordingly with exactness. (Id.)
9

10 For example, SIMON sent invoices to PLAINTIFFS that were dated December 16, 2016,
11 May 3, 2017, August 16, 2017, and September 25, 2017. (SIMON'S invoices that were actually
12 sent to PLAINTIFFS are attached to SIMON'S Motion to Adjudicate as Exhibit 20.) The
13 amount of fees and costs SIMON billed PLAINTIFFS in those invoices totaled \$486,453.09.
14 Simple reading and math shows that SIMON billed for his time at the hourly rate of \$550 per
15 hour. PLAINTIFFS paid the invoices in full to SIMON. (Id.)
16

17 SIMON also submitted an invoice to PLAINTIFFS on November 10, 2017, in the
18 amount of approximately \$72,000. (Id.) However, SIMON withdrew the invoice and failed to
19 resubmit the invoice to PLAINTIFFS, despite an email request from Brian Edgeworth to do so.
20 (Id.) It is unknown to PLAINTIFFS whether SIMON ever disclosed that "final" invoice to the
21 defendants in the LITIGATION or whether he added those fees and costs to the mandated
22 computation of damages.
23

24 From the beginning of his representation of PLAINTIFFS, SIMON was aware that
25 PLAINTIFFS were required to secure loans to pay SIMON'S fees and costs in the
26 LITIGATION. SIMON was also aware that the loans secured by PLAINTIFFS accrued interest.
27 It's not something for SIMON to gloat over or question the business sense of PLAINTIFFS, as
28 SIMON did in his Motion at page 12. Rather, SIMON knew that PLAINTIFFS could not sue for

1 traditional loans to pay SIMON'S fees and costs. (Id.) Plus, SIMON didn't express an interest
2 in taking what amounted to a property damage claim with a value of \$500,000 on a contingency
3 basis. Easy math shows that 40% of \$500,000 is \$200,000; SIMON billed over twice that in
4 fees in the invoices that he disclosed in the LITIGATION. In reality, SIMON only wanted what
5 amounts to a bonus after he'd received \$500,000 in fees and costs and after the risk of loss was
6 gone.

7
8 As discovery in the underlying LITIGATION neared its conclusion in the late fall of
9 2017, after the value of the case blossomed from one of property damage of approximately
10 \$500,000 to one of significant and additional value do to the conduct of one of the defendants,
11 and after a significant sum of money was offered to PLAINTIFFS from defendants, SIMON
12 became determined to get more, so he started asking PLAINTIFFS to modify the CONTRACT.
13 (Id.) Thereafter, Mr. Edgeworth sent an email labeled "Contingency." (See Exhibit 4 to the
14 Motion to Adjudicate.) (Remarkably, SIMON misleads the Court in his Motion at page 11 by
15 using this email from August of 2017 that discusses modifying the original terms of fee
16 agreement) to support his unsupportable and untenable position that the parties didn't have a
17 "structured discussion" in 2016 on fees.) The sole purpose of that email was to make it clear to
18 SIMON that PLAINTIFFS never had a structured conversation about modifying the existing fee
19 agreement from an hourly agreement to a contingency agreement. (Please see Exhibit 1.)
20

21 SIMON scheduled an appointment for PLAINTIFFS to come to his office to discuss the
22 LITIGATION. (Id.) Instead, his only agenda item was to pressure PLAINTIFFS into
23 modifying the terms of the CONTRACT. (Id.) SIMON told PLAINTIFFS that he wanted to be
24 paid far more than \$550.00 per hour and the \$486,453.09 he'd received from PLAINTIFFS for
25 the preceding eighteen (18) months. (Id.)
26

27 The timing of SIMON'S request for the CONTRACT to be modified was deeply
28 troubling to PLAINTIFFS, for it came at the time when the risk of loss in the LITIGATION had