

**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

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1 invoices.

2 But what quantum meruit says in the Rosenberg case,  
3 which is squarely on point and good law, says that you can't,  
4 as the Edgeworths say, well, I want to hold Simon to this 550,  
5 275, knowing full good and well, as they both told you on the  
6 stand he wasn't billing them for all his time. Full good and  
7 well, both of them acknowledge that. We want to hold Simon to  
8 that even though we both agree the case has changed in the  
9 infamous, you know, in the August 22nd email with  
10 Mr. Edgeworth saying we never contemplated it. We've got to  
11 incent us both blah, blah, blah.

12 When they ultimately try to fire him and then sue  
13 him, which you've tossed in its entirety, alleging conversion  
14 and claiming that all the money that was owed, that was in the  
15 trust by then, I think Mr. Vannah and Mr. Simon had agreed the  
16 money was getting put in the trust, that they both signed off  
17 on them. They filed a lawsuit saying that all that money was  
18 theirs knowing it wasn't, and both of them testified they knew  
19 all that money wasn't theirs when they hit the stand, a year  
20 after they filed the lawsuit saying it was all theirs.

21 So what Rosenberg says and what I would encourage the  
22 Court to do is to make a determination from September 19th  
23 forward: What's the quantum meruit? What's the value of the  
24 services rendered? And I think it's a simple easy analogy.  
25 September 19th, 2017, there was zero dollars on the table to

1 settle this case, not one penny, not a grocery dollar.

2           When Mr. Simon was fired, as the Court found November  
3 the 29th, there's \$6 million on the table. You use Will Kemp's  
4 market value analysis, the quantum meruit, the value of the  
5 services rendered, and it's not a contingency fee agreement. I  
6 know the defense wants to try to argue that because it gets  
7 them into the Rule 1.5, and then they can say, well, it's a  
8 violation, you can't -- well, that's not the analysis that Will  
9 Kemp gave you, and Mr. Kemp's testimony is unrefuted, Judge.  
10 They didn't have an expert. Arguments of counsel is not  
11 evidence.

12           So the value of services rendered, the market value,  
13 according to unrefuted testimony of Will Kemp is 2.4 million.  
14 You back off what they paid, and that's the full value of  
15 what's in the case. So that's what I suggest to the Court  
16 should happen, which is a legal analysis.

17           Now, if I step back and say, all right, well, Judge  
18 Jones decided this implied contract exists, how do we deal with  
19 the -- sort of your last issue, the superbill and the hours not  
20 awarded, and I wrote -- I'll try to have some numbers for you,  
21 Judge. The superbill, Your Honor, in total is \$692,120. The  
22 amount from May of '16, when the initial Starbucks meeting,  
23 through constructive discharge, just to give you a number is  
24 \$583,618. So the amount of time billed on the superbill that  
25 was not included in the four invoices is \$583,618.75.



1           Let me step back for a tiny second. What I think the  
2 testimony was between all the parties, all of them, is that the  
3 Edgeworths, although there was that chart that was created to  
4 sort of try to reflect that there was double billing or  
5 something done, Your Honor caught that before anybody did, and  
6 both the Edgeworths conceded they had no reason to doubt that  
7 all the time billed on the superbill was billed. Time was  
8 expended. It was expended for their benefit by Mr. Simon and  
9 his office.

10           And so the question really becomes, and I'll get to  
11 where your conclusions -- you were worried is the way I read  
12 your decision, Your Honor, and actually I was here for the  
13 whole hearing. So I got to watch the Court's demeanor. And I  
14 think the concern comes from -- I'll just give you a simple  
15 example that I can recall -- Mr. Vannah making hay with  
16 Ms. Ferrel, who is about as honest and straightforward as a  
17 person could be up there about the day where she had 23 hours  
18 billed, and what Ms. Ferrel said, and I think it's reflected in  
19 sort of the Court's findings is well, hey, I can't tell you I  
20 worked 23 hours that day, but I can tell you I did all 23 of  
21 hours at work although it may have been spread over some days.

22           And so what I think the Court's concern was was that  
23 hey, that makes it kind of speculative, these superbill bills  
24 that weren't paid -- that weren't billed contemporaneous, and  
25 what I would suggest to the Court is that the Court, as a

1 finder of fact can't speculate, can't guess as to whether  
2 something is true or not true, and the evidence, the record, as  
3 we sit here today, the record is without blemish that every  
4 single hour was tied to a tangible event in that superbill,  
5 every single hour, and that in fact the superbill is a gross  
6 under exaggeration. I mean, recall, Your Honor, the nine  
7 banker boxes of emails, not one of which was ever billed in  
8 those four invoices. So I think the Court was worried that  
9 hey, well there's this 23 hours in one day. That doesn't seem  
10 possible so, you know, I should -- I really don't know that I  
11 can go backwards in time and do that.

12 And we cited the law, the Messengers [phonetic]. I'm  
13 mispronouncing it. It's kind of a goofy spelling, but there is  
14 no requirement, and the defendant has not provided you any  
15 requirement, any legal authority for the notion that a lawyer  
16 has to bill contemporaneously or the notion that a lawyer can't  
17 go back and bill for hours he really expended and, in fact, in  
18 the cases we gave you, lawyers were allowed to estimate their  
19 time, right, and give their best guess as to what their time  
20 was, and the courts have upheld that across the country,  
21 including in Nevada.

22 Mr. Simon and Ms. Ferrel didn't do that. They went  
23 back in meticulous detail underbilling by hundreds, if not more  
24 hours what work they put in to the benefit of the Edgeworths,  
25 and I say that for the following reasons, Your Honor. Both

1 Mr. and Mrs. Edgeworth concede on cross-examination that the  
2 4 million bucks they already got, that Mr. Vannah settled the  
3 case with the four of them, they got out of the settlement  
4 their 4 million, but that has made them more [indiscernible].  
5 That's the 4 million.

6 So the question sort of ultimately comes down: Do  
7 they still get the unjust enrichment of hours, hundreds and  
8 hundreds of hours that Mr. Simon and Ms. Ferrel put in to get  
9 them more than whole by the windfall of another one and a half?  
10 I mean, it's just a windfall to them, and the hours were  
11 expended, and if you think, and I guess I would encourage you,  
12 if you're worried about one or two days that Mr. Vannah did a  
13 very nice job on cross and pointed out to Ms. Ferrel probably  
14 you didn't work 23 hours on that day, all right. Cut 15 hours.  
15 Don't cut the superbill across the board, Your Honor. I mean,  
16 that's just punishing the law firm and is rewarding folks that  
17 came in here and in your court.

18 You didn't make blatant findings of it, but my read  
19 of your orders is you didn't buy a lot of what the Edgeworths  
20 were selling in terms of Mr. Simon threatening them,  
21 intimidating Mrs. Edgeworth by lurching over her in his office,  
22 which is a physical impossibility. I just don't see how you  
23 reward persons that come in here and say, hey, from the outset  
24 we had an agreement, and then you find that not true.

25 They didn't have an agreement from the outset, didn't

1 have an agreement your finding was until Mr. Simon, being the  
2 gullible friend that he was, billed them in December, seven  
3 months after he started working on the file. That was when the  
4 Court found that the conduct of the parties created an implied  
5 agreement, not Mr. Edgeworth and Mrs. Edgeworth's fantasies  
6 about they always had this agreement, and it was going to be  
7 this. You found just the opposite.

8           And so I would suggest to the Court that if you are  
9 still of the mindset that it is the hourly rate that controls,  
10 and that hourly rate controls up until the constructive  
11 discharge, and I've told you my view of the quantum meruit and  
12 when it should occur, that you've really got to go back and  
13 under the law that we give you, where Courts say over and over  
14 and over, if the lawyer puts in the work, he deserves to be  
15 paid for it. Whether he billed contemporaneous or not is  
16 irrelevant. Whether he went back and had to do a new bill  
17 because the client sued him and accused him of stealing, and  
18 that's what happened.

19           They sued in early January, accused Mr. Simon of  
20 stealing their money. I mean, there's emails to that effect.  
21 Mr. Vannah sent an email, the clients think he's going to steal  
22 the money, run off with it I think Bob -- is what he said to --

23           MR. VANNAH: Yeah. That's what the client said. He  
24 thought he was going to steal the money. I told them I don't  
25 think he is, but --

1 MR. CHRISTIANSEN: That's right. I was just trying  
2 to quote it accurately.

3 THE COURT: I read the emails. I've read the emails.

4 MR. VANNAH: That's what my clients think. They  
5 still think he would've stolen the money. So what if I tell  
6 you?

7 MR. CHRISTIANSEN: And I think the Court should  
8 consider that, Judge, when you toss a conversion case on its  
9 face as being -- having no merit, I mean, you threw it out on a  
10 12B5 motion that's likely a summary judgment.

11 And what I was getting at to you before is in terms  
12 of who are you going to award for the firm's hard work. You've  
13 got the people that did it or the people that have already been  
14 made more than whole. I'd point out to you in this case an  
15 attorney fee adjudication, our Supreme Court is crystal clear  
16 that this is a court of equity.

17 You're supposed to do what's equitable amongst the  
18 parties, and I can cite to you. It's the Leventhal versus  
19 Black case. Natural equity, the client should not be allowed  
20 to appropriate the whole of the judgment without paying for the  
21 services of the attorney who obtained it. That's on page 24 of  
22 our brief, Your Honor, Leventhal versus Black & LoBello, 129  
23 Nevada 472.

24 So if the Court's going to -- if the Court is married  
25 to the notion that it's an hourly billable case throughout, the

1 firm deserves all those hours, not to be chopped because the  
2 Court suspects there may have been a problem on a given day  
3 with a given number of hours billed. Chop that bill if that's  
4 what you want to do, but not across the board all of the  
5 superbill because those bills are --

6 I mean, I can tell you, I had to learn this case --  
7 not an easy case to learn. I mean, you had to learn it too.  
8 It was probably a bigger pain for you to listen to all of us,  
9 but, I mean, there are thousands of hours involved in this  
10 case, and I had the office next to the guy who was prosecuting  
11 the case and there every weekend every night. To not pay him  
12 for those hours, Judge --

13 MR. VANNAH: Let me object. This is coming very  
14 close to testimony, personal testimony of what he personally  
15 observed. I mean, that's not appropriate. I can't  
16 cross-examine him, and he's just going to, trust me, Judge. I  
17 was over there. I saw how hard they worked.

18 MR. CHRISTIANSEN: I'll rephrase. I'll rephrase.

19 MR. VANNAH: This is supposed --

20 THE COURT: Okay. He's going to rephrase.

21 MR. CHRISTIANSEN: I'll move on. I'm sorry.

22 MR. VANNAH: Now, I'm getting testimony, and I'm not  
23 going to get up and testify.

24 THE COURT: Okay.

25 MR. CHRISTIANSEN: Judge, you heard the testimony.

1 THE COURT: I did.

2 MR. CHRISTIANSEN: Don't listen to me. What the  
3 lawyers say isn't testimony, just like what Mr. Greene and  
4 Mr. Vannah argue or put in these briefs, and we all got to see  
5 each other's closings, you know, postruling.

6 THE COURT: Right.

7 MR. CHRISTIANSEN: It's been sent over in your -- so  
8 I saw all the arguments put forward, and I guess I would just  
9 have the Court think about like if were in a jury trial what  
10 would I be saying to the jury. Hey, what Mr. Vannah says isn't  
11 evidence. You can't even consider it. You can listen to him  
12 for what he thinks -- how the evidence played, but their view  
13 on the superbill isn't the record you're left with and the  
14 Court that reviews this is left with.

15 The record that everybody is left with is that the  
16 work was done, the hours were expended. They're  
17 underestimated. There's not even bills for phone calls which,  
18 I mean, undoubtedly, by listening to Mr. and Mrs. Edgeworth,  
19 you know there were tons of them. The Edgeworths concede, both  
20 of them, Angela and Brian, that they had no evidence that any  
21 of the hours in the superbill were not expended. In other  
22 words, they agree all that time was spent.

23 If all the time was spent, under the equitable law  
24 that we've cited to you in the Leventhal case, you can't, you  
25 know, over reward them again or unjustly enrich them again when

1 they've been made more than whole from the settlement they've  
2 already received.

3           So I'd encourage the Court to look at the Rosenberg  
4 decision. It's our view that quantum meruit applies from the  
5 last time the parties' conduct created the implied agreement,  
6 Your Honor, referenced, and that was September the 19th. It's  
7 an easy evaluation. September 19th, there's not a dollar on  
8 the table. November the 29th, there's \$6 million on the table.

9           If the Court legally disagrees with me on that and  
10 wants to stick with the hourly analysis, suspicion that there  
11 may have been an erroneous entry here or there should not lead  
12 to the conclusion that the superbill needs to be chopped across  
13 the board is suspicious because that's a guess. The evidence  
14 you are left with from the Edgeworths, from Mr. Simon and  
15 Ms. Ferrel is that all of those bills were tied to a tangible  
16 event, every one of them and that it was a mass under billing.

17           And finally I would tell the Court that if you do  
18 chop the superbill, what you're, in fact, doing is undermining  
19 your own conclusion because you concluded that an implied  
20 contract for 550 and 275, took place by the conduct of the  
21 parties starting in December of '16 when Simon sent the first  
22 bill. If you chop all of his time, you're not even giving him  
23 the 550 an hour you concluded the implied contract created.  
24 He's making 100 bucks an hour, 150 bucks an hour. Ashley is  
25 working for 75, 50 bucks an hour, and the Edgeworths are



1 gaining a windfall and being unjustly enriched.

2 And that's just not the way it should work in a court  
3 of equity when persons hit the stand, as the Edgeworths both  
4 did, and my read of your conclusions is you didn't buy the  
5 versions of the truth they were selling, and that's because  
6 they couldn't even be consistent with each other. Remember,  
7 Brian Edgeworth said, We needed the loans because we didn't  
8 have money to pay off the house, and then Mrs. Edgeworth the  
9 last day says, Oh, we had all the money in the world. We  
10 didn't even need the settlement to pay off the house. We  
11 planned. We paid that all off.

12 I won't belabor the point, Your Honor, but those are  
13 our issues. We appreciate all the time the Court has spent,  
14 and I know it's been a lot of time -- I really do -- you read  
15 everything, were thoughtful with all of us, and so respectfully  
16 we'd submit it on that, Your Honor.

17 THE COURT: Okay. Mr. Vannah.

18 MR. VANNAH: I think it telling when Mr. Simon wrote  
19 this -- I know who wrote it. I can tell who wrote it,  
20 [indiscernible]. It's telling when he says, well, Mr. Vannah  
21 has conceded, the Edgeworths have conceded that there was no --  
22 that there was a constructive discharge because they didn't  
23 file a motion to reconsider. So, see, I guess --

24 We respect the Court. I respect you, Judge. I don't  
25 agree with everything that you decided. I don't agree with the

1 constructive discharge. I don't think it was there, but we  
2 went through five days of testimony. You gave us all the time  
3 that we needed, and you didn't cut us short. You said I'm here  
4 as long as you need me, and we went through five days of  
5 testimony. We went through an oral argument. We presented  
6 everything to the Court, and you made an incredibly detailed  
7 decision, findings and, you know, do I agree --

8           So when Mr. Simon said, well, he must agree that  
9 there was constructive discharge because he didn't file a  
10 motion to reconsider. I didn't file a motion to reconsider  
11 because I follow the rules. I actually believe in the rules  
12 that we live under. I thought we all lived under. The motion  
13 to reconsider is to be filed if there is new law that wasn't --  
14 that came out. Maybe there is a new case that came out, new  
15 facts that came out, that suddenly out of somewhere new facts.

16           And so if we don't agree with Your Honor on a  
17 constructive discharge, what is our obligation? I'm not going  
18 to come in here and tell you you're wrong. I'm not going to  
19 come in and say, Judge, you just got it all wrong after five  
20 days, your decision. I wouldn't do that to a jury. If we  
21 don't like what you did and if we think you're wrong, our  
22 obligation is to file an appeal with the Supreme Court and say,  
23 hey, is the Judge right or wrong on the law on constructive  
24 discharge?

25           And so I'm not going to come in here and file a

1 motion to reconsider and say I don't have anything new to add,  
2 absolutely nothing. There is not one shred of things that were  
3 added today that you haven't already considered. I mean,  
4 nothing new, not one single new thing other than to come in and  
5 say I only got a million dollars in the last couple years, and  
6 I'm a victim. A million dollars, a lot of people would think  
7 that's not being victimized if you made a million bucks in a  
8 couple years working on a case. I just don't see anything new  
9 to add.

10 I mean, you considered where we are. If the parties  
11 are aggrieved, then we go to the Supreme Court and say, look,  
12 in all due respect, we think the Judge applied the law wrong or  
13 whatever but factual decisions you made in detail. I don't  
14 understand why we're here. I don't see anything new to be  
15 added.

16 It's hard for me to argue because it's what -- what  
17 they've done is just got up and argued the whole case again  
18 saying, well, you got it wrong. You listened to all the  
19 argument, and you got all the argument. You read everything.  
20 You spent five days listening to testimony, and you screwed it  
21 up. That's what they're saying. So you don't just reverse  
22 yourself and just tear this order apart and write a whole new  
23 order.

24 I thought, you know, getting the fees straight, the  
25 cost straightened out, that's important for all of us and, you

1 know, I don't care if you use the word oral, implied contract  
2 or implied contract, you know, I don't know. That was for you  
3 to decide. I think either choice would be fine, but I thought  
4 the way you wrote it was fine.

5 I wasn't conceding we thought there was constructive  
6 discharge. I mean, in all due honesty, I believe that that --  
7 you know, with all due respect for the Court, I mean,  
8 [indiscernible] but, yeah, I think you got that wrong.

9 THE COURT: That's okay, Mr. Vannah.

10 MR. VANNAH: And they think you got it right, and so,  
11 you know, I'm not sure you got it wrong. I mean, it's an  
12 issue, but I've thought that before with a Judge and have gone  
13 to the Supreme Court, and the Supreme Court said, hey,  
14 Mr. Vannah, the Judge was right, and you're wrong. I'm, like,  
15 all right. I'm an advocate. So we didn't --

16 So when they write in there and say, well, he's  
17 conceded it because he didn't file a motion to reconsider, what  
18 that tells me is Mr. Simon -- I don't think it's the other two  
19 gentlemen who wrote this motion. There's no doubt in my mind.  
20 When he wrote it, he doesn't understand that if you're not --  
21 if the trier of fact makes decisions and you don't have  
22 anything new to add, you don't just keep coming back like  
23 Groundhog Day. You ask the Supreme Court to look at it and  
24 say, hey, did the Judge apply the right standard or not?

25 And that's where I don't see a reason for us to come

1 in here and reargue this case and, you know, the fact that I  
2 didn't file a motion to reconsider doesn't mean that I adopted  
3 every decision that you made, but it just means that I don't  
4 think there's anything new to add, and I thought you applied  
5 the law and the facts. It's a very rational decision. I mean,  
6 there's nothing like some crazy thing you did. It's all very  
7 rationally applied, and so, I mean, this motion to reconsider  
8 was just incorrect.

9           There's stuff in there, like -- which is not  
10 relevant. Like, well, Mr. Vannah charges 925 an hour, and the  
11 clients said 550 was too much. Well, first of all, I'm not  
12 Danny Simon. So I don't know. Maybe I'm worth 2,000 an hour.  
13 Maybe he's worth 100. I'm not saying -- what has that got to  
14 do with this motion to reconsider to throw stuff in there like  
15 that?

16           And to sit here and say that my clients never even  
17 said that 550 an hour was unreasonable, they never said that.  
18 There's no testimony they ever got up here, and they put that  
19 in the motion that they said 550 is unreasonable. No, they  
20 thought 550 was the rate. They agreed to it, and that's what  
21 they agreed to, and they continued paying the 550.

22           And by the way, and he's absolutely right. All the  
23 money, all the money in that trust account belongs to my  
24 client, 100 percent of it. What my clients do owe him is a  
25 fee, and that's how it was always the way it was. He wasn't

1 withholding money. He wasn't even getting a retainer. When  
2 they would send a bill -- he sent a bill, they would send a  
3 check. So their point was is that's all our money, but we do  
4 owe Mr. Simon money. We owed him a fee, and so if we were  
5 willing to pay a reasonable bill, that 550 an hour, and so that  
6 is our money.

7           It's our money that's being held in that trust  
8 account when we owe him a reasonable fee. That's not the way  
9 it was in the first place, but I get the lien law. They're  
10 misconstruing what I'm saying, and that's my fault. I wrote  
11 it, but technically all the money in the trust account was  
12 theirs. Having said that, they did owe him a fee and owed him  
13 money for costs, which they would've written a check, like they  
14 always had.

15           I don't see -- see, that's the problem with this. If  
16 we file a motion to reconsider, and we start doing that over  
17 and over like Groundhog Day, we're really subverting the rules.  
18 We're just coming here and saying that you're wrong. Therefore  
19 you should reconsider. After you've heard all this, you've  
20 made the decision. You know, there comes a point where if  
21 we're not happy with what you decided, and we feel that you've  
22 abused your discretion, we file an appeal, and that's where we  
23 are right now, not to rewrite this whole decision, otherwise, I  
24 mean, every case you ever get involved in where you're acting  
25 Judge you're going to get these motions to reconsider when

1 there's nothing new. I know you understand what I'm saying.

2 Well, thank you, Your Honor. That's where we are.

3 THE COURT: Okay.

4 MR. CHRISTENSEN: Your Honor, if I could, I'm going  
5 to do a brief reply. I want to do one quick reply on the law  
6 and on why we're here, and then just I want to --

7 MR. VANNAH: Well, wait a minute. I thought we had  
8 this rule that we had in the first place that we had one person  
9 on each side. I mean, Mr. Greene is not going to -- and I  
10 thought that's what you guys insisted upon.

11 THE COURT: Well, I mean, I think that was something  
12 that we did during the hearing, but Mr. Christensen is the  
13 person who signed all these motions.

14 MR. VANNAH: [Indiscernible.]

15 THE COURT: I understand that, but Mr. Christensen --

16 MR. VANNAH: The other --

17 THE COURT: These motions are written in his name.

18 MR. VANNAH: That's fine. You know what, Judge,  
19 it's --

20 THE COURT: It's just going to be their reply,  
21 Mr. Vannah.

22 MR. CHRISTENSEN: I'll be fast.

23 THE COURT: Mr. Christensen.

24 MR. CHRISTENSEN: You'll only dislike a little bit of  
25 it.

1 MR. VANNAH: I hope we're not going to do a motion to  
2 reconsider the motion to reconsider. Somewhere this has to  
3 end.

4 MR. CHRISTENSEN: So, Your Honor, I just want to  
5 address the whole rules issue, and we do operate under the  
6 rules. We had a hearing which was -- essentially this is a  
7 bench trial that we had.

8 THE COURT: Pretty much.

9 MR. CHRISTENSEN: And you issued findings of fact and  
10 conclusions of law. So if we had a jury trial, and if we  
11 thought something went awry, we'd file a motion under Rule 59  
12 from the District Court to see if we could fix it before we go  
13 to the appellate court. That's what the rule says.

14 When you've got a bench trial and you've got a  
15 hearing, and the Court issues findings of fact, conclusions of  
16 law, and you think something went awry, the Appellate Court  
17 wants you to fix it in District Court level which is why they  
18 created Rule 52, which is why when I wrote this motion I led  
19 off with motion to amend findings under NRCP 52 because that's  
20 what it is. Now, you throw in reconsideration because that's  
21 what we all do. I apologize for doing it. Next time I'll only  
22 say motion to amend under Rule 52.

23 But that rule doesn't have any of those large  
24 barriers that a motion for reconsideration has. Rule 52 is  
25 simply the Court's discretion. If there's a problem with



1 findings of fact and conclusions of law, you clean them up  
2 then. So the appellate standard of review that was cited in  
3 the briefs filed by Mr. Vannah and Mr. Greene don't apply. You  
4 don't have to show that's something new. You don't have to  
5 show a change in the law. Rule 52 gives you an opportunity  
6 when you've got findings of fact and conclusions of law to make  
7 proper amendments and to try to fix perceived problems at the  
8 District Court level to save the Appellate Court time, and  
9 that's why the Appellate Court likes these kinds of motions,  
10 and that's why we filed it.

11 And just one general observation, I can understand  
12 the characterization that Mr. Simon has made close to a million  
13 dollars, and he's claiming he's a victim. Of course, the other  
14 side of that coin is the Edgeworths have made over 4 million,  
15 and they're claiming victimization. So it's probably a bad  
16 argument for either side to make.

17 Getting into what we're talking about here, and this  
18 is kind of a quick laundry list. I'm not going to go on over  
19 and argue everything. The costs resolved; however, to the  
20 extent that the Court addresses the costs in the findings  
21 section, we'd request that the Court still do so because it's  
22 important under the timeline of events that it be made clear  
23 that there were advanced outstanding costs at the time that the  
24 lien's filed and at the time that the complaint was filed  
25 against Mr. Simon alleging he was trying to steal money when he

1 filed the liens to secure his advance costs.

2           So we agree costs have been paid. We agree that the  
3 issue of the final accounting of the costs has been resolved,  
4 at least as far as we know, as of today, but we would -- while  
5 there should not be an award of new money to Mr. Simon for  
6 costs, the costs should still be mentioned.

7           THE COURT: Okay.

8           MR. CHRISTENSEN: Fair enough.

9           We found what we think is a typo that might address  
10 an appellate view of this issue at page 18, lines 11 through  
11 12, of the order that addresses the adjudication. It's a  
12 fairly minor thing, but, you know, sometimes those things get  
13 blown up. The Court indicated that it was addressing the area  
14 of billing from September 29 through constructive discharge,  
15 and we think that that probably should have been September  
16 19th, which was the last date billed for under the fourth and  
17 last bill submitted. It was probably just a typo.

18          THE COURT: Okay.

19          MR. CHRISTENSEN: As far as the actual billing goes,  
20 if the Court is not going to award quantum meruit at a minimum  
21 for September 19th forward, we would request the Court would  
22 find an alternate finding as to what that would be because that  
23 would prevent us from going through this again if an Appellate  
24 Court said, no, you get quantum meruit and sent it back down.  
25 So as an alternate finding, that would be useful. That's

1 not -- the Court doesn't have to do that, of course. We just  
2 are making a request.

3 MR. VANNAH: Now, let me object to this. This is all  
4 new material you just heard on an argument. In other words,  
5 they made an argument. I -- now, we're hearing something new  
6 beyond what was argued just a few minutes ago. So I do want to  
7 respond to that new argument he just made.

8 MR. CHRISTENSEN: It's not an argument. It's just a  
9 request.

10 MR. VANNAH: Well, then I --

11 THE COURT: Right. But are these also --

12 MR. CHRISTENSEN: And then if the Court doesn't want  
13 to do it, the Court doesn't --

14 THE COURT: Yeah. But these are also like new  
15 request. I mean, you guys made specific requests in the motion  
16 of what you would like me to do. Is this in addition to that?

17 MR. CHRISTENSEN: Well, no, Your Honor.

18 THE COURT: Okay.

19 MR. CHRISTENSEN: I don't think it is.

20 THE COURT: Okay.

21 MR. CHRISTENSEN: You know, Mr. Vannah may disagree.

22 THE COURT: Right. I'm aware of the specific  
23 requests that you guys made in the motion.

24 MR. CHRISTENSEN: Okay. Right.

25 THE COURT: We don't have to go through them all

1 individually.

2 MR. CHRISTENSEN: Correct.

3 THE COURT: I read the motion.

4 MR. CHRISTENSEN: If Your Honor is going to readdress  
5 the issue of the superbill that was addressed in our motion,  
6 Mr. Christiansen talked about it --

7 THE COURT: Christiansen argued it. Yep.

8 MR. CHRISTENSEN: -- then we would also ask that you  
9 specifically, if you're going to address it, that you readdress  
10 the paragraph at page 17, lines 2 through 12, of the lien order  
11 because that kind of -- that's kind of the paragraph that has  
12 the meat and potatoes of -- or at least what our interpretation  
13 of it that addressed to that issue.

14 And if you're not going to readdress the superbill,  
15 then we ask the Court to flesh out -- then we're asking the  
16 Court to flesh out what -- if the Court actually had a specific  
17 ruling on minimum billing because I think that that was --

18 THE COURT: Well, I mean, I'm --

19 MR. CHRISTENSEN: It wasn't directly addressed,  
20 but --

21 THE COURT: I'm just going to say this right now,  
22 Mr. Christensen. I'm not going to rewrite my findings. If  
23 there's something that was argued here today that you guys  
24 believe is erroneous, that I make a finding is erroneous or if  
25 I choose to revisit the superbill, if I choose to revisit the

1 superbill, I'm telling you right now I'm revisiting the  
2 numbers. I'm not going to go back and rewrite my original  
3 findings because everything that I intended to be in those  
4 findings is included in them.

5 And I know somebody is taking this up no matter what  
6 I choose to do. So if the Supreme Court wants more explicit  
7 information from me, I'm just going to have them to request it  
8 because I'm not going to go back and alter. If I believe that  
9 there is a reason to alter the numbers, I'll go back and alter  
10 the numbers, but as far as my findings as to -- and if I alter  
11 the numbers based on my findings versus the superbill, I'll do  
12 that, but I'm not going to go line by line and alter my  
13 findings. I mean, if it's not complete enough for the Supreme  
14 Court, they're going to order me to do something different.

15 MR. CHRISTENSEN: I know. And I appreciate your  
16 response, and just to wrap up very quickly, we actually did  
17 request the alternate finding.

18 THE COURT: Right. And that's what I'm saying.

19 MR. CHRISTENSEN: Page 19 of the --

20 THE COURT: I know you did.

21 MR. CHRISTENSEN: Page 19 of our brief, we did make  
22 that request.

23 THE COURT: No. You requested that in your brief.  
24 That's why I'm saying you don't have to request it today. I've  
25 read the brief.

1 MR. CHRISTENSEN: So it's not new argument. I just  
2 wanted to bring it up. So thank you, Your Honor.

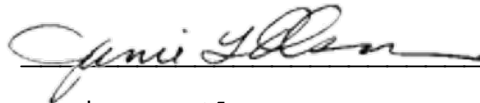
3 THE COURT: No problem.

4 Okay. Well, like I said, I know that no matter what  
5 happens here today and in the future of this case, somebody is  
6 taking this up. So I'm going to issue a written order on this.  
7 I'll have it done within the next week, probably by -- it'll be  
8 done by Monday because I'm not here the rest of next week. So  
9 it'll be done before the holiday. Okay.

10 (Proceedings concluded 10:15 a.m.)

11 -oOo-

12 ATTEST: I do hereby certify that I have truly and correctly  
13 transcribed the audio/video proceedings in the above-entitled  
14 case.

15  
16 

17 Janie L. Olsen  
18 Transcriber  
19  
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	<b>275 [3]</b> 6/25 7/5 16/20 <b>29 [1]</b> 26/14 <b>29th [3]</b> 6/11 8/3 16/8	26/11 <b>adopted [1]</b> 21/2 <b>advance [1]</b> 26/1 <b>advanced [1]</b> 25/23 <b>advocate [1]</b> 20/15 <b>after [4]</b> 7/20 12/3 18/19 22/19 <b>again [4]</b> 15/25 15/25 19/17 26/23 <b>against [1]</b> 25/25 <b>aggrieved [1]</b> 19/11 <b>ago [1]</b> 27/6 <b>agree [10]</b> 3/15 7/8 15/22 17/25 17/25 18/7 18/8 18/16 26/2 26/2 <b>agreed [4]</b> 4/7 7/15 21/20 21/21 <b>agreement [11]</b> 5/22 6/2 6/18 6/24 8/5 11/24 11/25 12/1 12/5 12/6 16/5 <b>all [50]</b> <b>alleging [2]</b> 7/13 25/25 <b>allowed [2]</b> 10/18 13/19 <b>already [5]</b> 4/7 11/2 13/13 16/2 19/3 <b>also [5]</b> 2/4 3/5 27/11 27/14 28/8 <b>alter [5]</b> 29/8 29/9 29/9 29/10 29/12 <b>alternate [3]</b> 26/22 26/25 29/17 <b>although [2]</b> 9/3 9/21 <b>always [3]</b> 12/6 21/25 22/14 <b>amend [5]</b> 1/13 3/8 4/24 24/19 24/22 <b>amended [1]</b> 3/23 <b>amendments [1]</b> 25/7 <b>amongst [1]</b> 13/17 <b>amount [3]</b> 3/24 8/22 8/24 <b>analogy [1]</b> 7/24 <b>analysis [6]</b> 4/22 4/23 8/4 8/8 8/16 16/10 <b>Angela [1]</b> 15/20 <b>another [2]</b> 6/4 11/9 <b>any [4]</b> 10/14 10/15 15/20 24/23 <b>anybody [1]</b> 9/5 <b>anything [9]</b> 3/10 4/1 4/10 4/12 19/1 19/8 19/14 20/22 21/4 <b>apart [1]</b> 19/22 <b>apologize [2]</b> 3/17 24/21 <b>appeal [2]</b> 18/22 22/22 <b>APPEARANCES [1]</b> 1/18 <b>appellate [9]</b> 5/9 5/13 24/13 24/16 25/2 25/8 25/9 26/10 26/23 <b>applied [3]</b> 19/12 21/4 21/7 <b>applies [1]</b> 16/4 <b>apply [4]</b> 6/8 6/10 20/24 25/3 <b>appreciate [2]</b> 17/13	29/15 <b>appropriate [2]</b> 13/20 14/15 <b>are [19]</b> 2/23 3/1 4/4 4/6 12/8 13/12 14/5 14/9 16/14 16/25 17/12 19/10 19/11 22/23 23/2 23/17 27/2 27/11 27/14 <b>area [1]</b> 26/13 <b>argue [4]</b> 8/6 15/4 19/16 25/19 <b>argued [4]</b> 19/17 27/6 28/7 28/23 <b>argument [9]</b> 18/5 19/19 19/19 25/16 27/4 27/5 27/7 27/8 30/1 <b>arguments [2]</b> 8/10 15/8 <b>as [26]</b> 2/16 4/11 5/14 7/4 7/5 8/2 9/16 9/16 9/25 10/1 10/2 10/19 13/9 17/3 18/4 18/4 26/4 26/4 26/4 26/19 26/19 26/22 26/25 29/10 29/10 29/10 <b>Ashley [1]</b> 16/24 <b>ask [4]</b> 4/24 20/23 28/8 28/15 <b>asking [1]</b> 28/15 <b>at [16]</b> 5/1 5/4 5/13 6/13 9/21 13/11 16/3 20/23 25/7 25/23 25/24 26/4 26/10 26/20 28/10 28/12 <b>ATTEST [1]</b> 30/12 <b>attorney [2]</b> 13/15 13/21 <b>audio [1]</b> 30/13 <b>audio/video [1]</b> 30/13 <b>August [1]</b> 7/9 <b>authority [1]</b> 10/15 <b>award [3]</b> 13/12 26/5 26/20 <b>awarded [3]</b> 3/16 6/12 8/20 <b>aware [1]</b> 27/22 <b>awry [2]</b> 24/11 24/16	17/7 17/22 18/9 18/11 19/16 20/17 24/19 24/20 25/21 26/22 28/11 28/17 29/3 29/8 30/8 <b>becomes [1]</b> 9/10 <b>been [10]</b> 9/21 13/13 14/2 15/7 16/1 16/11 17/14 26/2 26/3 26/15 <b>before [8]</b> 1/11 2/24 3/13 9/5 13/11 20/12 24/12 30/9 <b>behalf [1]</b> 2/6 <b>being [5]</b> 12/1 13/9 17/1 19/7 22/7 <b>belabor [1]</b> 17/12 <b>believe [4]</b> 18/11 20/6 28/24 29/8 <b>belongs [1]</b> 21/23 <b>bench [2]</b> 24/7 24/14 <b>benefit [2]</b> 9/8 10/24 <b>best [1]</b> 10/19 <b>between [1]</b> 9/2 <b>beyond [1]</b> 27/6 <b>bigger [1]</b> 14/8 <b>bill [10]</b> 4/17 10/16 10/17 12/16 14/3 16/22 22/2 22/2 22/5 26/17 <b>billable [1]</b> 13/25 <b>billed [10]</b> 8/24 9/7 9/7 9/18 9/24 10/7 12/2 12/15 14/3 26/16 <b>billing [6]</b> 7/6 9/4 16/16 26/14 26/19 28/17 <b>bills [5]</b> 6/25 9/23 14/5 15/17 16/15 <b>binding [1]</b> 6/24 <b>bit [1]</b> 23/24 <b>Black [2]</b> 13/19 13/22 <b>blah [3]</b> 7/11 7/11 7/11 <b>blatant [1]</b> 11/18 <b>blemish [1]</b> 10/3 <b>blown [1]</b> 26/13 <b>board [3]</b> 11/15 14/4 16/13 <b>Bob [3]</b> 2/8 2/12 12/22 <b>both [11]</b> 6/14 7/5 7/7 7/8 7/11 7/16 7/18 9/6 10/25 15/19 17/3 <b>boxes [1]</b> 10/7 <b>BOYD [1]</b> 1/24 <b>Brian [2]</b> 15/20 17/7 <b>brief [6]</b> 6/15 13/22 23/5 29/21 29/23 29/25 <b>briefing [1]</b> 5/25 <b>briefly [1]</b> 3/12 <b>briefs [2]</b> 15/4 25/3 <b>bring [1]</b> 30/2 <b>bucks [5]</b> 11/2 16/24 16/24 16/25 19/7 <b>bunch [1]</b> 5/24 <b>but [34]</b> <b>buy [2]</b> 11/19 17/4
<b>MR. CHRISTENSEN:</b> <b>[24]</b> 2/19 2/22 3/2 23/4 23/22 23/24 24/4 24/9 26/8 26/19 27/8 27/12 27/17 27/19 27/21 27/24 28/2 28/4 28/8 28/19 29/15 29/19 29/21 30/1	<b>MR. CHRISTIANSEN:</b> <b>[14]</b> 3/12 3/19 4/2 4/11 4/18 4/21 5/19 13/1 13/7 14/18 14/21 14/25 15/2 15/7 <b>MR. GREENE: [4]</b> 2/8 2/12 2/15 3/1 <b>MR. VANNAH: [17]</b> 3/25 4/4 4/8 12/23 13/4 14/13 14/19 14/22 17/18 20/10 23/7 23/14 23/16 23/18 24/1 27/3 27/10 <b>THE COURT: [43]</b>			
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<b>1</b>	<b>A</b> <b>a.m [4]</b> 2/1 3/3 3/3 30/10 <b>about [7]</b> 9/16 9/17 11/12 12/6 15/9 25/17 28/6 <b>above [1]</b> 30/13 <b>above-entitled [1]</b> 30/13 <b>absolutely [2]</b> 19/2 21/22 <b>abused [1]</b> 22/22 <b>accepted [1]</b> 5/23 <b>according [1]</b> 8/13 <b>account [3]</b> 21/23 22/8 22/11 <b>accounting [1]</b> 26/3 <b>accurately [1]</b> 13/2 <b>accused [2]</b> 12/17 12/19 <b>acknowledge [1]</b> 7/7 <b>across [4]</b> 10/20 11/15 14/4 16/12 <b>acting [1]</b> 22/24 <b>actual [1]</b> 26/19 <b>actually [4]</b> 9/12 18/11 28/16 29/16 <b>add [5]</b> 3/11 19/1 19/9 20/22 21/4 <b>added [2]</b> 19/3 19/15 <b>addition [1]</b> 27/16 <b>address [3]</b> 24/5 26/9 28/9 <b>addressed [3]</b> 28/5 28/13 28/19 <b>addresses [2]</b> 25/20 26/11 <b>addressing [1]</b> 26/13 <b>adjudication [2]</b> 13/15	<b>B</b> <b>back [15]</b> 4/21 6/17 6/19 8/14 8/17 9/1 10/17 10/23 12/12 12/16 20/22 26/24 29/2 29/8 29/9 <b>backs [1]</b> 6/6 <b>backwards [1]</b> 10/11 <b>bad [1]</b> 25/15 <b>banker [1]</b> 10/7 <b>barriers [1]</b> 24/24 <b>based [1]</b> 29/11 <b>be [23]</b> 2/24 3/22 9/17 12/6 12/14 13/19 14/1 15/10 16/12 17/6 18/13 19/14 20/3 23/20 23/22 25/22 26/5 26/6 26/22 26/25 29/3 30/7 30/9 <b>because [25]</b> 2/10 5/1 5/22 8/6 12/17 14/1 14/5 16/13 16/19 17/5	<b>C</b> <b>calling [1]</b> 5/24 <b>calls [1]</b> 15/17 <b>came [4]</b> 17/14 18/14 18/15	

<b>C</b>	<b>concede [2]</b> 11/1 15/19 <b>conceded [4]</b> 9/6 17/21 17/21 20/17 <b>conceding [1]</b> 20/5 <b>concern [2]</b> 9/14 9/22 <b>concluded [3]</b> 16/19 16/23 30/10 <b>conclusion [2]</b> 16/12 16/19 <b>conclusions [7]</b> 4/24 9/11 17/4 24/10 24/15 25/1 25/6 <b>conduct [9]</b> 5/5 5/15 6/18 6/20 6/21 6/23 12/4 16/5 16/20 <b>consider [2]</b> 13/8 15/11 <b>considered [2]</b> 19/3 19/10 <b>consistent [1]</b> 17/6 <b>consolidated [1]</b> 2/4 <b>constructive [11]</b> 4/15 6/7 8/23 12/10 17/22 18/1 18/9 18/17 18/23 20/5 26/14 <b>contemplated [1]</b> 7/10 <b>contemporaneous [2]</b> 9/24 12/15 <b>contemporaneously [1]</b> 10/16 <b>contingency [1]</b> 8/5 <b>continued [1]</b> 21/21 <b>contract [14]</b> 4/14 5/6 5/6 5/8 5/11 5/16 5/17 6/5 6/17 8/18 16/20 16/23 20/1 20/2 <b>controls [2]</b> 12/9 12/10 <b>conversion [2]</b> 7/13 13/8 <b>correct [2]</b> 3/23 28/2 <b>correctly [1]</b> 30/12 <b>cost [5]</b> 3/15 3/15 4/3 4/16 19/25 <b>costs [12]</b> 4/4 4/6 4/11 22/13 25/19 25/20 25/23 26/1 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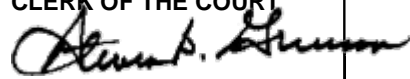


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<p><b>Mr [1]</b> 2/19</p> <p><b>Mr. [55]</b></p> <p><b>Mr. and [2]</b> 11/1 15/18</p> <p><b>Mr. Christensen [7]</b> 2/3 2/5 5/9 23/12 23/15 23/23 28/22</p> <p><b>Mr. Christiansen [4]</b> 3/10 3/17 4/9 28/6</p> <p><b>Mr. Edgeworth [2]</b> 7/10 12/5</p> <p><b>Mr. Greene [4]</b> 2/6 15/3 23/9 25/3</p> <p><b>Mr. Kemp's [1]</b> 8/9</p> <p><b>Mr. Simon [18]</b> 2/23 2/23 7/15 8/2 9/8 10/22 11/8 11/20 12/1 12/19 16/14 17/18 18/8 20/18 22/4 25/12 25/25 26/5</p> <p><b>Mr. Vannah [16]</b> 2/24 7/15 9/15 11/2 11/12 12/21 15/4 15/10 17/17 17/20 20/9 20/14 21/10 23/21 25/3 27/21</p> <p><b>Mr. Vannah's [1]</b> 6/1</p> <p><b>Mrs. [5]</b> 11/1 11/21 12/5 15/18 17/8</p>	<p><b>Mrs. Edgeworth [4]</b> 11/1 11/21 15/18 17/8</p> <p><b>Mrs. Edgeworth's [1]</b> 12/5</p> <p><b>Ms. [6]</b> 9/16 9/18 10/22 11/8 11/13 16/15</p> <p><b>Ms. Ferrel [6]</b> 9/16 9/18 10/22 11/8 11/13 16/15</p> <p><b>much [2]</b> 21/11 24/8</p> <p><b>must [1]</b> 18/8</p> <p><b>my [16]</b> 3/20 5/4 11/18 12/11 13/4 17/4 20/19 21/16 21/23 21/24 22/10 28/22 29/2 29/10 29/11 29/12</p> <p><b>N</b></p> <p><b>name [2]</b> 5/24 23/17</p> <p><b>Natural [1]</b> 13/19</p> <p><b>need [2]</b> 17/10 18/4</p> <p><b>needed [2]</b> 17/7 18/3</p> <p><b>needs [1]</b> 16/12</p> <p><b>NEVADA [4]</b> 1/2 2/1 10/21 13/23</p> <p><b>never [5]</b> 2/24 3/2 7/10 21/16 21/17</p> <p><b>new [21]</b> 12/16 18/13 18/14 18/14 18/15 19/1 19/4 19/4 19/8 19/14 19/22 20/22 21/4 23/1 25/4 26/5 27/4 27/5 27/7 27/14 30/1</p> <p><b>next [4]</b> 14/10 24/21 30/7 30/8</p> <p><b>nice [1]</b> 11/13</p> <p><b>night [1]</b> 14/11</p> <p><b>nine [1]</b> 10/6</p> <p><b>no [19]</b> 1/5 1/6 2/22 4/1 4/13 9/6 10/14 13/9 15/20 17/21 20/19 21/18 21/19 26/24 27/17 29/5 29/23 30/3 30/4</p> <p><b>nobody [1]</b> 5/23</p> <p><b>not [66]</b></p> <p><b>notes [1]</b> 3/20</p> <p><b>nothing [4]</b> 19/2 19/4 21/6 23/1</p> <p><b>notion [4]</b> 5/7 10/15 10/16 13/25</p> <p><b>NOVEMBER [6]</b> 1/12 2/1 6/3 6/11 8/2 16/8</p> <p><b>NOVEMBER 15 [1]</b> 2/1</p> <p><b>now [8]</b> 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10/7 10/9 11/9 11/12 16/16 19/2 19/4 23/5 23/8 25/11</p> <p><b>only [3]</b> 19/5 23/24 24/21</p> <p><b>oOo [1]</b> 30/11</p> <p><b>opening [1]</b> 6/14</p> <p><b>operate [1]</b> 24/5</p> <p><b>opportunity [1]</b> 25/5</p> <p><b>opposite [1]</b> 12/7</p> <p><b>opposition [1]</b> 3/9</p> <p><b>or [20]</b> 1/13 3/8 5/13 5/13 5/24 9/4 10/2 10/16 11/12 12/15 13/13 15/4 15/25 16/11 18/23 19/12 20/2 20/24 28/12 28/24</p> <p><b>oral [8]</b> 4/14 5/7 5/8 5/11 5/16 6/4 18/5 20/1</p> <p><b>order [10]</b> 1/13 4/19 5/12 5/20 19/22 19/23 26/11 28/10 29/14 30/6</p> <p><b>orders [2]</b> 5/15 11/19</p> <p><b>original [1]</b> 29/2</p> <p><b>other [9]</b> 1/9 3/25 15/21 17/6 19/4 20/18 23/16 25/13 27/4</p> <p><b>other's [1]</b> 15/5</p> <p><b>otherwise [1]</b> 22/23</p> <p><b>our [15]</b> 6/6 6/16 6/19 13/15 13/22 16/4 17/13 18/17 18/21 22/3 22/6 22/7 28/5 28/12 29/21</p> <p><b>out [12]</b> 5/12 11/3 11/13 13/9 13/14 18/14 18/14 18/15 18/15 19/25 28/15 28/16</p> <p><b>outset [2]</b> 11/23 11/25</p> <p><b>outstanding [1]</b> 25/23</p> <p><b>over [15]</b> 5/4 5/4 5/4 9/21 11/21 12/13 12/13 12/14 14/17 15/7 15/25 22/16 22/17 25/14 25/18</p>	<p><b>owe [4]</b> 21/24 22/4 22/8 22/12</p> <p><b>owed [3]</b> 7/14 22/4 22/12</p> <p><b>own [1]</b> 16/19</p> <p><b>P</b></p> <p><b>page [5]</b> 13/21 26/10 28/10 29/19 29/21</p> <p><b>page 17 [1]</b> 28/10</p> <p><b>page 18 [1]</b> 26/10</p> <p><b>Page 19 [2]</b> 29/19 29/21</p> <p><b>page 24 [1]</b> 13/21</p> <p><b>paid [6]</b> 4/1 8/14 9/24 12/15 17/11 26/2</p> <p><b>pain [1]</b> 14/8</p> <p><b>paragraph [2]</b> 28/10 28/11</p> <p><b>parties [12]</b> 4/5 5/5 5/15 6/18 6/20 6/21 6/23 9/2 12/4 13/18 16/21 19/10</p> <p><b>parties' [1]</b> 16/5</p> <p><b>pay [4]</b> 14/11 17/8 17/10 22/5</p> <p><b>paying [2]</b> 13/20 21/21</p> <p><b>penny [1]</b> 8/1</p> <p><b>people [3]</b> 13/13 13/13 19/6</p> <p><b>perceived [1]</b> 25/7</p> <p><b>percent [1]</b> 21/24</p> <p><b>person [3]</b> 9/17 23/8 23/13</p> <p><b>personal [1]</b> 14/14</p> <p><b>personally [1]</b> 14/14</p> <p><b>persons [2]</b> 11/23 17/3</p> <p><b>PETER [1]</b> 1/19</p> <p><b>phone [1]</b> 15/17</p> <p><b>phonetic [1]</b> 10/12</p> <p><b>physical [1]</b> 11/22</p> <p><b>place [3]</b> 16/20 22/9 23/8</p> <p><b>Plaintiff [1]</b> 1/5</p> <p><b>planned [1]</b> 17/11</p> <p><b>played [1]</b> 15/12</p> <p><b>PLUMBING [2]</b> 1/7 3/4</p> <p><b>point [6]</b> 6/8 7/3 13/14 17/12 22/3 22/20</p> <p><b>pointed [1]</b> 11/13</p> <p><b>position [1]</b> 6/19</p> <p><b>possible [1]</b> 10/10</p> <p><b>postruling [1]</b> 15/5</p> <p><b>potatoes [1]</b> 28/12</p> <p><b>presented [1]</b> 18/5</p> <p><b>Pretty [1]</b> 24/8</p> <p><b>prevent [1]</b> 26/23</p> <p><b>probably [6]</b> 11/13 14/8 25/15 26/15 26/17 30/7</p> <p><b>problem [4]</b> 14/2 22/15 24/25 30/3</p> <p><b>problems [1]</b> 25/7</p> <p><b>proceedings [4]</b> 1/8 3/3 30/10 30/13</p> <p><b>proper [2]</b> 4/23 25/7</p> <p><b>prosecuting [1]</b> 14/10</p> <p><b>provided [1]</b> 10/14</p> <p><b>pull [1]</b> 2/15</p>	<p><b>punishing [1]</b> 11/16</p> <p><b>purposes [1]</b> 5/10</p> <p><b>pursuant [1]</b> 4/5</p> <p><b>put [6]</b> 7/16 10/24 11/8 15/4 15/8 21/18</p> <p><b>puts [1]</b> 12/14</p> <p><b>Q</b></p> <p><b>quantum [10]</b> 5/20 6/8 6/9 7/2 7/23 8/4 12/11 16/4 26/20 26/24</p> <p><b>question [2]</b> 9/10 11/6</p> <p><b>quick [2]</b> 23/5 25/18</p> <p><b>quickly [1]</b> 29/16</p> <p><b>quote [1]</b> 13/2</p> <p><b>R</b></p> <p><b>rate [3]</b> 12/9 12/10 21/20</p> <p><b>rational [1]</b> 21/5</p> <p><b>rationally [1]</b> 21/7</p> <p><b>RE [1]</b> 1/13</p> <p><b>reached [1]</b> 5/8</p> <p><b>read [13]</b> 3/8 3/9 3/9 5/4 9/11 11/18 13/3 13/3 17/4 17/14 19/19 28/3 29/25</p> <p><b>readdress [3]</b> 28/4 28/9 28/14</p> <p><b>ready [1]</b> 2/10</p> <p><b>really [6]</b> 9/10 10/10 10/17 12/12 17/14 22/17</p> <p><b>reargue [1]</b> 21/1</p> <p><b>reason [3]</b> 9/6 20/25 29/9</p> <p><b>reasonable [2]</b> 22/5 22/8</p> <p><b>reasons [1]</b> 10/25</p> <p><b>recall [2]</b> 9/15 10/6</p> 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<p>12/21 15/7 16/21 22/2</p> <p>26/24</p> <p><b>September [8]</b> 6/22</p> <p>7/22 7/25 16/6 16/7</p> <p>26/14 26/15 26/21</p> <p><b>September 19th [1]</b></p> <p>7/22</p> <p><b>September 29 [1]</b></p> <p>26/14</p> <p><b>services [4]</b> 7/24 8/5</p> <p>8/12 13/21</p> <p><b>settle [1]</b> 8/1</p> <p><b>settled [5]</b> 4/15 5/21</p> <p>5/21 6/3 11/2</p> <p><b>settlement [5]</b> 5/21 6/2</p> <p>11/3 16/1 17/10</p> <p><b>seven [1]</b> 12/2</p> <p><b>she [1]</b> 9/17</p> <p><b>short [1]</b> 18/3</p> <p><b>SHORTENING [1]</b> 1/13</p> <p><b>should [12]</b> 3/22 8/16</p> <p>10/10 12/12 13/7 13/19</p> <p>16/11 17/2 22/19 26/5</p> <p>26/6 26/15</p> <p><b>show [2]</b> 25/4 25/5</p> <p><b>shred [1]</b> 19/2</p> <p><b>side [3]</b> 23/9 25/14</p> <p>25/16</p> <p><b>signed [4]</b> 5/22 6/1</p> <p>7/16 23/13</p> <p><b>SIMON [28]</b> 1/19 2/5</p> <p>2/6 2/6 2/23 2/23 3/5</p> <p>3/6 7/4 7/7 7/15 8/2 9/8</p> <p>10/22 11/8 11/20 12/1</p> <p>12/19 16/14 16/21</p> <p>17/18 18/8 20/18 21/12</p> <p>22/4 25/12 25/25 26/5</p> <p><b>simple [2]</b> 7/24 9/14</p> <p><b>simply [1]</b> 24/25</p> <p><b>single [3]</b> 10/4 10/5</p> <p>19/4</p> <p><b>sit [2]</b> 10/3 21/16</p> <p><b>so [57]</b></p> <p><b>some [4]</b> 5/25 8/20</p> <p>9/21 21/6</p> <p><b>somebody [2]</b> 29/5</p> <p>30/5</p> <p><b>somehow [1]</b> 5/9</p> <p><b>something [10]</b> 4/6 9/5</p> <p>10/2 23/11 24/11 24/16</p> <p>25/4 27/5 28/23 29/14</p> <p><b>sometimes [1]</b> 26/12</p>	<p><b>somewhat [1]</b> 5/20</p> <p><b>somewhere [2]</b> 18/15</p> <p>24/2</p> <p><b>sorry [2]</b> 3/19 14/21</p> <p><b>sort [8]</b> 4/22 5/23 6/6</p> <p>6/20 8/19 9/4 9/19 11/6</p> <p><b>specific [3]</b> 27/15</p> <p>27/22 28/16</p> <p><b>specifically [1]</b> 28/9</p> <p><b>speculate [1]</b> 10/1</p> <p><b>speculative [1]</b> 9/23</p> <p><b>spelling [1]</b> 10/13</p> <p><b>spent [4]</b> 15/22 15/23</p> <p>17/13 19/20</p> <p><b>spread [1]</b> 9/21</p> <p><b>squarely [1]</b> 7/3</p> <p><b>stand [3]</b> 7/6 7/19 17/3</p> <p><b>standard [2]</b> 20/24</p> <p>25/2</p> <p><b>Starbucks [1]</b> 8/22</p> <p><b>start [2]</b> 5/3 22/16</p> <p><b>started [2]</b> 2/10 12/3</p> <p><b>starting [1]</b> 16/21</p> <p><b>steal [3]</b> 12/21 12/24</p> <p>25/25</p> <p><b>stealing [2]</b> 12/17</p> <p>12/20</p> <p><b>step [2]</b> 8/17 9/1</p> <p><b>stick [1]</b> 16/10</p> <p><b>still [5]</b> 11/7 12/9 13/5</p> <p>25/21 26/6</p> <p><b>stolen [1]</b> 13/5</p> <p><b>straight [1]</b> 19/24</p> <p><b>straightened [1]</b> 19/25</p> <p><b>straightforward [1]</b></p> <p>9/16</p> <p><b>stuck [1]</b> 5/8</p> <p><b>stuff [2]</b> 21/9 21/14</p> <p><b>submit [1]</b> 17/16</p> <p><b>submitted [2]</b> 6/25</p> <p>26/17</p> <p><b>subverting [1]</b> 22/17</p> <p><b>suddenly [1]</b> 18/15</p> <p><b>sue [1]</b> 7/12</p> <p><b>sued [2]</b> 12/17 12/19</p> <p><b>suggest [3]</b> 8/15 9/25</p> <p>12/8</p> <p><b>summary [1]</b> 13/10</p> <p><b>super [1]</b> 4/16</p> <p><b>superbill [18]</b> 8/19</p> <p>8/21 8/24 9/7 9/23 10/4</p> <p>10/5 11/15 14/5 15/13</p> <p>15/21 16/12 16/18 28/5</p> <p>28/14 28/25 29/1 29/11</p> <p><b>supposed [2]</b> 13/17</p> <p>14/19</p> <p><b>Supreme [10]</b> 4/25</p> <p>5/13 13/15 18/22 19/11</p> <p>20/13 20/13 20/23 29/6</p> <p>29/13</p> <p><b>sure [1]</b> 20/11</p> <p><b>suspects [1]</b> 14/2</p> <p><b>suspicion [1]</b> 16/10</p> <p><b>suspicious [1]</b> 16/13</p>	<p><b>taking [2]</b> 29/5 30/6</p> <p><b>talked [1]</b> 28/6</p> <p><b>talking [1]</b> 25/17</p> <p><b>tangible [2]</b> 10/4 16/15</p> <p><b>tear [1]</b> 19/22</p> <p><b>technically [2]</b> 2/17</p> <p>22/11</p> <p><b>tell [7]</b> 9/19 9/20 13/5</p> <p>14/6 16/17 17/19 18/18</p> <p><b>telling [3]</b> 17/18 17/20</p> <p>29/1</p> <p><b>tells [1]</b> 20/18</p> <p><b>terms [3]</b> 6/16 11/20</p> <p>13/11</p> <p><b>testified [1]</b> 7/18</p> <p><b>testify [1]</b> 14/23</p> <p><b>testimony [12]</b> 8/9</p> <p>8/13 9/2 14/14 14/14</p> <p>14/22 14/25 15/3 18/2</p> <p>18/5 19/20 21/18</p> <p><b>than [5]</b> 5/10 11/9</p> <p>13/14 16/1 19/4</p> <p><b>thank [2]</b> 23/2 30/2</p> <p><b>that [204]</b></p> <p><b>that's [50]</b></p> <p><b>their [10]</b> 2/23 9/8</p> <p>10/18 10/19 10/19 11/4</p> <p>12/20 15/12 22/3 23/20</p> <p><b>theirs [4]</b> 7/18 7/19</p> <p>7/20 22/12</p> <p><b>them [24]</b> 4/19 6/14 7/6</p> <p>7/7 7/17 7/18 8/7 9/2</p> <p>11/3 11/4 11/9 11/10</p> <p>11/20 12/2 12/24 15/19</p> <p>15/20 15/25 15/25</p> <p>16/16 25/1 27/25 29/4</p> <p>29/7</p> <p><b>then [16]</b> 3/21 4/16</p> <p>6/16 7/12 7/15 8/7</p> <p>11/24 17/8 19/11 23/6</p> <p>25/2 27/10 27/12 28/8</p> <p>28/15 28/15</p> <p><b>there [29]</b> 3/14 5/9 7/25</p> <p>9/3 9/4 9/17 10/13 14/2</p> <p>14/9 14/11 14/17 15/19</p> <p>16/10 16/11 17/21</p> <p>17/22 18/1 18/9 18/13</p> <p>18/14 19/2 20/5 20/16</p> <p>21/9 21/14 22/20 25/23</p> <p>26/5 29/9</p> <p><b>there's [15]</b> 5/24 8/3</p> <p>10/9 12/20 15/17 16/7</p> <p>16/8 20/19 21/4 21/6</p> <p>21/9 21/18 23/1 24/25</p> <p>28/23</p> <p><b>Therefore [1]</b> 22/18</p> <p><b>these [8]</b> 9/23 15/4</p> <p>22/25 23/13 23/17 25/9</p> <p>27/11 27/14</p> <p><b>they [44]</b></p> <p><b>they'll [1]</b> 2/24</p> <p><b>they're [6]</b> 5/1 15/16</p> <p>19/21 22/9 25/15 29/14</p> <p><b>they've [3]</b> 16/1 16/1</p> <p>19/17</p> <p><b>thing [5]</b> 3/14 3/25</p> <p>19/4 21/6 26/12</p> <p><b>things [3]</b> 4/18 19/2</p> <p>26/12</p>	<p><b>think [41]</b></p> <p><b>thinks [1]</b> 15/12</p> <p><b>this [43]</b></p> <p><b>those [10]</b> 6/25 10/8</p> <p>14/1 14/5 14/12 16/15</p> <p>17/12 24/23 26/12 29/3</p> <p><b>though [2]</b> 3/25 7/8</p> <p><b>thought [11]</b> 12/24</p> <p>18/12 19/24 20/3 20/5</p> <p>20/12 21/4 21/20 23/7</p> <p>23/10 24/11</p> <p><b>thoughtful [1]</b> 17/15</p> <p><b>thousands [1]</b> 14/9</p> <p><b>threatening [1]</b> 11/20</p> <p><b>three [1]</b> 5/14</p> <p><b>threw [1]</b> 13/9</p> <p><b>through [10]</b> 6/14 8/23</p> <p>18/2 18/4 18/5 26/10</p> <p>26/14 26/23 27/25</p> <p>28/10</p> <p><b>throughout [2]</b> 5/14</p> <p>13/25</p> <p><b>throw [2]</b> 21/14 24/20</p> <p><b>THURSDAY [1]</b> 1/12</p> <p><b>tied [2]</b> 10/4 16/15</p> <p><b>TIERRA [1]</b> 1/11</p> <p><b>time [21]</b> 1/13 6/11</p> <p>6/17 7/6 8/24 9/7 9/7</p> <p>10/11 10/19 10/19</p> <p>15/22 15/23 16/5 16/22</p> <p>17/13 17/14 18/2 24/21</p> <p>25/8 25/23 25/24</p> <p><b>timeline [1]</b> 25/22</p> <p><b>tiny [1]</b> 9/1</p> <p><b>today [6]</b> 10/3 19/3</p> <p>26/4 28/23 29/24 30/5</p> <p><b>told [3]</b> 7/5 12/11 12/24</p> <p><b>tons [1]</b> 15/19</p> <p><b>too [3]</b> 2/23 14/7 21/11</p> <p><b>took [1]</b> 16/20</p> <p><b>toss [1]</b> 13/8</p> <p><b>tossed [1]</b> 7/13</p> <p><b>total [1]</b> 8/21</p> <p><b>TRAN [1]</b> 1/1</p> <p><b>transcribed [2]</b> 1/25</p> <p>30/13</p> <p><b>Transcriber [1]</b> 30/17</p> <p><b>TRANSCRIPT [1]</b> 1/7</p> <p><b>trial [4]</b> 15/9 24/7 24/10</p> <p>24/14</p> <p><b>trier [1]</b> 20/21</p> <p><b>true [3]</b> 10/2 10/2 11/24</p> <p><b>truly [1]</b> 30/12</p> <p><b>trust [10]</b> 1/4 1/22 2/7</p> <p>3/5 7/15 7/16 14/16</p> <p>21/23 22/7 22/11</p> <p><b>truth [1]</b> 17/5</p> <p><b>try [5]</b> 7/12 8/6 8/20 9/4</p> <p>25/7</p> <p><b>trying [2]</b> 13/1 25/25</p> <p><b>two [5]</b> 2/9 2/10 6/6</p> <p>11/12 20/18</p> <p><b>typo [2]</b> 26/9 26/17</p>
<p><b>S</b></p> <p><b>said [15]</b> 5/12 9/18</p> <p>12/22 12/23 17/7 18/3</p> <p>18/8 20/13 21/11 21/17</p> <p>21/17 21/19 22/12</p> <p>26/24 30/4</p> <p><b>save [1]</b> 25/8</p> <p><b>saw [3]</b> 2/15 14/17</p> <p>15/8</p> <p><b>say [19]</b> 3/14 6/16 7/4</p> <p>8/7 8/17 10/25 11/23</p> <p>12/13 15/3 18/19 18/22</p> <p>19/1 19/5 19/11 20/16</p> <p>20/24 21/16 24/22</p> <p>28/21</p> <p><b>saying [12]</b> 7/10 7/17</p> <p>7/20 15/10 19/18 19/21</p>	<p><b>table [4]</b> 7/25 8/3 16/8</p> <p>16/8</p> <p><b>take [1]</b> 4/19</p>	<p><b>T</b></p>	<p><b>take [1]</b> 4/19</p>	<p><b>U</b></p> <p><b>ultimately [3]</b> 5/1 7/12</p> <p>11/6</p> <p><b>unclear [1]</b> 11/6</p> <p><b>under [14]</b> 1/13 4/22</p>

<p><b>U</b></p> <p><b>under... [12]</b> 10/6 12/13 15/23 16/16 18/12 18/12 24/5 24/11 24/19 24/22 25/22 26/16</p> <p><b>underbilling [1]</b> 10/23</p> <p><b>underestimated [1]</b> 15/17</p> <p><b>undermining [1]</b> 16/18</p> <p><b>understand [6]</b> 5/14 19/14 20/20 23/1 23/15 25/11</p> <p><b>undisputed [4]</b> 3/14 3/15 5/23 6/1</p> <p><b>undoubtedly [1]</b> 15/18</p> <p><b>unjust [1]</b> 11/7</p> <p><b>unjustly [2]</b> 15/25 17/1</p> <p><b>unreasonable [2]</b> 21/17 21/19</p> <p><b>unrefuted [2]</b> 8/9 8/13</p> <p><b>until [2]</b> 12/1 12/10</p> <p><b>up [14]</b> 2/15 4/21 9/17 12/10 14/23 19/17 19/21 21/18 25/1 26/13 29/5 29/16 30/2 30/6</p> <p><b>upheld [1]</b> 10/20</p> <p><b>upon [1]</b> 23/10</p> <p><b>us [8]</b> 7/11 14/8 17/15 18/2 18/3 19/25 20/25 26/23</p> <p><b>use [2]</b> 8/3 20/1</p> <p><b>useful [1]</b> 26/25</p> <p><b>usual [1]</b> 2/16</p>	<p><b>was [75]</b></p> <p><b>wasn't [8]</b> 7/6 7/18 7/19 18/13 20/5 21/25 22/1 28/19</p> <p><b>watch [1]</b> 9/13</p> <p><b>way [9]</b> 2/12 2/23 4/24 9/11 17/2 20/4 21/22 21/25 22/8</p> <p><b>we [74]</b></p> <p><b>we'd [3]</b> 17/16 24/11 25/21</p> <p><b>we'll [1]</b> 5/3</p> <p><b>we're [9]</b> 19/14 22/17 22/18 22/21 23/6 24/1 25/17 27/5 28/15</p> <p><b>we've [2]</b> 7/10 15/24</p> <p><b>week [2]</b> 30/7 30/8</p> <p><b>weekend [1]</b> 14/11</p> <p><b>well [24]</b> 2/4 2/17 6/16 7/4 7/5 7/7 8/7 8/8 8/17 9/19 10/9 17/20 18/8 19/18 20/16 21/10 21/11 23/2 23/7 23/11 27/10 27/17 28/18 30/4</p> <p><b>went [8]</b> 6/14 10/22 12/16 18/2 18/4 18/5 24/11 24/16</p> <p><b>were [18]</b> 2/10 2/10 3/20 6/25 9/11 10/18 11/10 11/20 15/9 15/16 15/19 15/21 16/15 17/5 17/15 19/2 22/4 25/23</p> <p><b>weren't [2]</b> 9/24 9/24</p> <p><b>what [57]</b></p> <p><b>what's [4]</b> 7/23 7/23 8/15 13/17</p> <p><b>whatever [2]</b> 5/24 19/13</p> <p><b>when [31]</b></p> <p><b>where [10]</b> 6/17 9/11 9/17 12/13 19/10 20/25 22/20 22/22 22/24 23/2</p> <p><b>whether [3]</b> 10/1 12/15 12/16</p> <p><b>which [17]</b> 4/13 5/3 5/11 6/11 6/20 7/3 7/13 8/16 10/7 11/22 15/17 21/9 22/13 24/6 24/17 24/18 26/16</p> <p><b>while [1]</b> 26/4</p> <p><b>who [8]</b> 9/16 13/12 13/21 14/10 17/19 17/19 20/19 23/13</p> <p><b>who's [1]</b> 5/9</p> <p><b>whoever [1]</b> 5/13</p> <p><b>whole [9]</b> 9/13 11/9 13/14 13/20 16/1 19/17 19/22 22/23 24/5</p> <p><b>why [7]</b> 19/14 23/6 24/17 24/18 25/9 25/10 29/24</p> <p><b>will [4]</b> 3/1 8/3 8/8 8/13</p> <p><b>willing [1]</b> 22/5</p> <p><b>windfall [3]</b> 11/9 11/10 17/1</p> <p><b>withholding [1]</b> 22/1</p> <p><b>within [1]</b> 30/7</p> <p><b>without [2]</b> 10/3 13/20</p> <p><b>won't [1]</b> 17/12</p>	<p><b>word [3]</b> 5/8 5/25 20/1</p> <p><b>words [2]</b> 15/22 27/4</p> <p><b>work [7]</b> 9/21 10/24 11/14 12/14 13/12 15/16 17/2</p> <p><b>worked [2]</b> 9/20 14/17</p> <p><b>working [3]</b> 12/3 16/25 19/8</p> <p><b>world [1]</b> 17/9</p> <p><b>worried [3]</b> 9/11 10/8 11/12</p> <p><b>worth [2]</b> 21/12 21/13</p> <p><b>would [22]</b> 3/15 5/13 5/14 7/21 9/25 11/11 12/8 15/8 15/10 16/17 19/6 20/3 22/2 22/2 26/4 26/21 26/21 26/22 26/23 26/25 27/16 28/8</p> <p><b>would've [2]</b> 13/5 22/13</p> <p><b>wouldn't [1]</b> 18/20</p> <p><b>wrap [1]</b> 29/16</p> <p><b>write [2]</b> 19/22 20/16</p> <p><b>written [3]</b> 22/13 23/17 30/6</p> <p><b>wrong [10]</b> 18/18 18/19 18/21 18/23 19/12 19/18 20/8 20/11 20/14 22/18</p> <p><b>wrote [9]</b> 8/20 17/18 17/19 17/19 20/4 20/19 20/20 22/10 24/18</p> <p><b>Y</b></p> <p><b>yeah [3]</b> 12/23 20/8 27/14</p> <p><b>year [1]</b> 7/19</p> <p><b>years [2]</b> 19/5 19/8</p> <p><b>Yep [1]</b> 28/7</p> <p><b>Yes [1]</b> 4/8</p> <p><b>you [139]</b></p> <p><b>You'll [1]</b> 23/24</p> <p><b>you're [15]</b> 4/25 11/12 13/17 15/13 16/18 16/22 18/18 18/21 20/14 20/20 22/18 22/24 22/25 28/9 28/14</p> <p><b>you've [10]</b> 6/19 7/13 12/12 13/12 22/19 22/19 22/21 24/14 24/14 25/6</p> <p><b>your [36]</b></p> <p><b>yourself [1]</b> 19/22</p> <p><b>Z</b></p> <p><b>zero [1]</b> 7/25</p>	<p>WA02030</p>
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*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.

CASE NO.: A-16-738444-C

DEPT. NO.: X

**NOTICE OF ENTRY OF ORDERS**

EDGEWORTH FAMILY TRUST; AMERICAN  
GRATING, LLC,

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF  
DANIEL S. SIMON, A PROFESSIONAL  
CORPORATION; DOES I through X, inclusive,  
and ROE CORPORATIONS I through X,  
inclusive,

Defendants.

CASE NO.: A-18-767242-C

DEPT. NO.: XXIX

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

WA02031

PLEASE TAKE NOTICE that the following orders were entered on the dates listed below and attached as indicated:

1. November 19, 2018 Decision and Order Regarding Motion to Adjudicate Lien attached hereto (Exhibit 1)
2. November 19, 2018 Decision and Order Regarding Motion to Dismiss NRCP 12(B)(5) attached hereto as (Exhibit 2)

DATED this 27 day of December, 2018.

VANNAH & VANNAH

  
ROBERT D. VANNAH, ESQ.

**CERTIFICATE OF SERVICE**

I hereby certify that the following parties are to be served as follows:

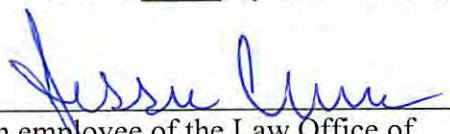
Electronically:

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Las Vegas, Nevada 89101

Traditional Manner:  
*None*

DATED this 27 day of December, 2018.

  
An employee of the Law Office of  
Vannah & Vannah

WA02032

# Exhibit 1

# Exhibit 1

1 **ORD**

2  
3  
4 **DISTRICT COURT**  
5 **CLARK COUNTY, NEVADA**

6 EDGEWORTH FAMILY TRUST; and  
7 AMERICAN GRATING, LLC,

8 Plaintiffs,

9 vs.

CASE NO.: A-18-767242-C

DEPT NO.: XXVI

10 LANGE PLUMBING, LLC; THE VIKING  
11 CORPORATION, a Michigan Corporation;  
12 SUPPLY NETWORK, INC., dba VIKING  
13 SUPPLYNET, a Michigan Corporation; and  
DOES 1 through 5; and, ROE entities 6 through

14 Defendants.

**Consolidated with**

CASE NO.: A-16-738444-C

DEPT NO.: X

15 EDGEWORTH FAMILY TRUST; and  
16 AMERICAN GRATING, LLC,

17 Plaintiffs,

18 vs.

**DECISION AND ORDER ON MOTION  
TO ADJUDICATE LIEN**

19 DANIEL S. SIMON; THE LAW OFFICE OF  
20 DANIEL S. SIMON, a Professional Corporation  
d/b/a SIMON LAW; DOES 1 through 10; and,  
ROE entities 1 through 10;

21 Defendants.

22  
23 **DECISION AND ORDER ON MOTION TO ADJUDICATE LIEN**

24 This case came on for an evidentiary hearing August 27-30, 2018 and concluded on  
25 September 18, 2018, in the Eighth Judicial District Court, Clark County, Nevada, the Honorable  
26 Tierra Jones presiding. Defendants and movant, Daniel Simon and Law Office of Daniel S. Simon  
27 d/b/a Simon Law ("Defendants" or "Law Office" or "Simon" or "Mr. Simon") having appeared in  
28



1 person and by and through their attorneys of record, Peter S. Christiansen, Esq. and James  
2 Christensen, Esq. and Plaintiff Edgeworth Family Trust and American Grating, ("Plaintiff" or  
3 "Edgeworths") having appeared through Brian and Angela Edgeworth, and by and through their  
4 attorneys of record, the law firm of Vannah and Vannah, Chtd. Robert Vannah, Esq. and John  
5 Greene, Esq. The Court having considered the evidence, arguments of counsel and being fully  
6 advised of the matters herein, the **COURT FINDS:**

### 7 8 **FINDINGS OF FACT**

9 1. The Court finds that the Law Office of Daniel S. Simon represented the Plaintiffs,  
10 Edgeworth Family Trust and American Grating in the case entitled Edgeworth Family Trust and  
11 American Grating v. Viking, et al., case number A-16-738444-C. The representation commenced on  
12 May 27, 2016 when Brian Edgeworth and Daniel Simon Esq. met at Starbucks. This representation  
13 originally began as a favor between friends and there was no discussion of fees, at this point. Mr.  
14 Simon and his wife were close family friends with Brian and Angela Edgeworth.

15 2. The case involved a complex products liability issue.

16 3. On April 10, 2016, a house the Edgeworths were building as a speculation home  
17 suffered a flood. The house was still under construction and the flood caused a delay. The  
18 Edgeworths did not carry loss insurance if a flood occurred and the plumbing company and  
19 manufacturer refused to pay for the property damage. A fire sprinkler installed by the plumber, and  
20 within the plumber's scope of work, caused the flood; however, the plumber asserted the fire  
21 sprinkler was defective and refused to repair or to pay for repairs. The manufacturer of the sprinkler,  
22 Viking, et al., also denied any wrongdoing.

23 4. In May of 2016, Mr. Simon agreed to help his friend with the flood claim and to send  
24 a few letters. The parties initially hoped that Simon drafting a few letters to the responsible parties  
25 could resolve the matter. Simon wrote the letters to the responsible parties, but the matter did not  
26 resolve. Since the matter was not resolved, a lawsuit had to be filed.

27 5. On June 14, 2016, a complaint was filed in the case of Edgeworth Family Trust; and  
28

1 American Grating LLC vs. Lange Plumbing, LLC; the Viking Corporation; Supply Network Inc.,  
2 dba Viking Supplynet, in case number A-18-738444-C. The cost of repairs was approximately  
3 \$500,000. One of the elements of the Edgeworth's damages against Lange Plumbing LLC ("Lange")  
4 in the litigation was for reimbursement of the fees and costs that were paid by the Edgeworths.

5 6. On August 9, 2017, Mr. Simon and Brian Edgeworth traveled to San Diego to meet  
6 with an expert. As they were in the airport waiting for a return flight, they discussed the case, and  
7 had some discussion about payments and financials. No express fee agreement was reached during  
8 the meeting. On August 22, 2017, Brian Edgeworth sent an email to Simon entitled "Contingency."  
9 It reads as follows:

10 We never really had a structured discussion about how this might be done.  
11 I am more that happy to keep paying hourly but if we are going for punitive  
12 we should probably explore a hybrid of hourly on the claim and then some  
13 other structure that incents both of us to win an go after the appeal that these  
14 scumbags will file etc.  
15 Obviously that could not have been doen earlier snce who would have thought  
16 this case would meet the hurdle of punitives at the start.  
17 I could also swing hourly for the whole case (unless I am off what this is  
18 going to cost). I would likely borrow another \$450K from Margaret in 250  
19 and 200 increments and then either I could use one of the house sales for cash  
20 or if things get really bad, I still have a couple million in bitcoin I could sell.  
21 I doubt we will get Kinsale to settle for enough to really finance this since I  
22 would have to pay the first \$750,000 or so back to Colin and Margaret and  
23 why would Kinsale settle for \$1MM when their exposure is only \$1MM?

24 (Def. Exhibit 27).

25 7. During the litigation, Simon sent four (4) invoices to the Edgeworths. The first  
26 invoice was sent on December 2, 2016, seven (7) months after the original meeting at Starbucks.  
27 This invoice indicated that it was for attorney's fees and costs through November 11, 2016. (Def.  
28 Exhibit 8). The total of this invoice was \$42,564.95 and was billed at a "reduced" rate of \$550 per  
hour. Id. The invoice was paid by the Edgeworths on December 16, 2016.

8. On April 7, 2017 a second invoice was sent to the Edgeworths for attorney's fees and  
costs through April 4, 2017 for a total of \$46,620.69, and was billed at a "reduced" rate of \$550 per

1 hour. (Def. Exhibit 9). This invoice was paid by the Edgeworths on May 3, 2017. There was no  
2 indication on the first two invoices if the services were those of Mr. Simon or his associates; but the  
3 bills indicated an hourly rate of \$550.00 per hour.

4 9. A third invoice was sent to the Edgeworths on July 28, 2017 for attorney's fees and  
5 costs through July 28, 2017 totaling of \$142,080.20. (Def. Exhibit 10). This bill identified services  
6 of Daniel Simon Esq. for a "reduced" rate of \$550 per hour totaling \$104,021.20; and services of  
7 Ashley Ferrel Esq. for a "reduced" rate of \$275 per hour totaling \$37,959.00. Id. This invoice was  
8 paid by the Edgeworths on August 16, 2017.

9 10. The fourth invoice was sent to the Edgeworths on September 19, 2017 in an amount  
10 of \$255,186.25 for attorney's fees and costs; with \$191,317.50 being calculated at a "reduced" rate  
11 of \$550 per hour for Daniel Simon Esq., \$60,981.25 being calculated at a "reduced" rate of \$275 per  
12 hour for Ashley Ferrel Esq., and \$2,887.50 being calculated at a "reduced" rate of \$275 per hour for  
13 Benjamin Miller Esq. (Def. Exhibit 11). This invoice was paid by the Edgeworths on September  
14 25, 2017.

15 11. The amount of attorney's fees in the four (4) invoices was \$367,606.25, and  
16 \$118,846.84 in costs; for a total of \$486,453.09.<sup>1</sup> These monies were paid to Daniel Simon Esq. and  
17 never returned to the Edgeworths. The Edgeworths secured very high interest loans to pay fees and  
18 costs to Simon. They made Simon aware of this fact.

19 12. Between June 2016 and December 2017, there was a tremendous amount of work  
20 done in the litigation of this case. There were several motions and oppositions filed, several  
21 depositions taken, and several hearings held in the case.

22 13. On the evening of November 15, 2017, the Edgeworth's received the first settlement  
23 offer for their claims against the Viking Corporation ("Viking"). However, the claims were not  
24 settled until on or about December 1, 2017.

25 14. Also on November 15, 2017, Brian Edgeworth sent an email to Simon asking for the  
26

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27 <sup>1</sup> \$265,677.50 in attorney's fees for the services of Daniel Simon; \$99,041.25 for the services of Ashley Ferrel; and  
28 \$2,887.50 for the services of Benjamin Miller.

1 open invoice. The email stated: "I know I have an open invoice that you were going to give me at a  
2 mediation a couple weeks ago and then did not leave with me. Could someone in your office send  
3 Peter (copied here) any invoices that are unpaid please?" (Def. Exhibit 38).

4 15. On November 17, 2017, Simon scheduled an appointment for the Edgeworths to  
5 come to his office to discuss the litigation.

6 16. On November 27, 2017, Simon sent a letter with an attached retainer agreement,  
7 stating that the fee for legal services would be \$1,500,000 for services rendered to date. (Plaintiff's  
8 Exhibit 4).

9 17. On November 29, 2017, the Edgeworths met with the Law Office of Vannah &  
10 Vannah and signed a retainer agreement. (Def. Exhibit 90). On this date, they ceased all  
11 communications with Mr. Simon.

12 18. On the morning of November 30, 2017, Simon received a letter advising him that the  
13 Edgeworths had retained the Vannah Law Firm to assist in the litigation with the Viking entities,  
14 et.al. The letter read as follows:

15  
16 "Please let this letter serve to advise you that I've retained Robert D. Vannah,  
17 Esq. and John B. Greene, Esq., of Vannah & Vannah to assist in the litigation  
18 with the Viking entities, et.al. I'm instructing you to cooperate with them in  
19 every regard concerning the litigation and any settlement. I'm also instructing  
20 you to give them complete access to the file and allow them to review  
whatever documents they request to review. Finally, I direct you to allow  
them to participate without limitation in any proceeding concerning our case,  
whether it be at depositions, court hearings, discussions, etc."

21 (Def. Exhibit 43).

22 19. On the same morning, Simon received, through the Vannah Law Firm, the  
23 Edgeworth's consent to settle their claims against Lange Plumbing LLC for \$25,000.

24 20. Also on this date, the Law Office of Danny Simon filed an attorney's lien for the  
25 reasonable value of its services pursuant to NRS 18.015. (Def. Exhibit 3). On January 2, 2018, the  
26 Law Office filed an amended attorney's lien for the sum of \$2,345,450, less payments made in the  
27 sum of \$367,606.25, for a net lien in the sum of \$1,977,843.80. This lien includes court costs and  
28

1 out-of-pocket costs advanced by the Law Office of Daniel S. Simon in the sum of \$76,535.93.

2 21. Mr. Edgeworth alleges that the fee agreement with Simon was only for an hourly  
3 express agreement of \$550 an hour; and that the agreement for \$550 an hour was made at the outset  
4 of the case. Mr. Simon alleges that he worked on the case always believing he would receive the  
5 reasonable value of his services when the case concluded. There is a dispute over the reasonable fee  
6 due to the Law Office of Danny Simon.

7 22. The parties agree that an express written contract was never formed.

8 23. On December 7, 2017, the Edgeworths signed a Consent to Settle their claims against  
9 Lange Plumbing LLC for \$100,000.

10 24. On January 4, 2018, the Edgeworth Family Trust filed a lawsuit against Simon in  
11 Edgeworth Family Trust; American Grating LLC vs. Daniel S. Simon, the Law Office of Daniel S.  
12 Simon, a Professional Corporation, case number A-18-767242-C.

13 25. On January 24, 2018, the Law Office of Danny Simon filed a Motion to Adjudicate  
14 Lien with an attached invoice for legal services rendered. The amount of the invoice was  
15 \$692,120.00. The Court set an evidentiary hearing to adjudicate the lien.

## 16 CONCLUSION OF LAW

### 17 The Law Office Appropriately Asserted A Charging Lien Which Must Be Adjudicated By The 18 Court

19  
20 An attorney may obtain payment for work on a case by use of an attorney lien. Here, the  
21 Law Office of Daniel Simon may use a charging lien to obtain payment for work on case A-16-  
22 738444-C under NRS 18.015.

23 NRS 18.015(1)(a) states:

24 1. An attorney at law shall have a lien:

25 (a) Upon any claim, demand or cause of action, including any claim for unliquidated  
26 damages, which has been placed in the attorney's hands by a client for suit or  
collection, or upon which a suit or other action has been instituted.

27 Nev. Rev. Stat. 18.015.

1 The Court finds that the lien filed by the Law Office of Daniel Simon, in case A-16-738444-C,  
2 complies with NRS 18.015(1)(a). The Law Office perfected the charging lien pursuant to NRS  
3 18.015(3), by serving the Edgeworths as set forth in the statute. The Law Office charging lien was  
4 perfected before settlement funds generated from A-16-738444-C of \$6,100,000.00 were deposited,  
5 thus the charging lien attached to the settlement funds. Nev. Rev. Stat. 18.015(4)(a); Golightly &  
6 Vannah, PLLC v. TJ Allen LLC, 373 P.3d 103, at 105 (Nev. 2016). The Law Office's charging lien  
7 is enforceable in form.

8 The Court has personal jurisdiction over the Law Office and the Plaintiffs in A-16-738444-C.  
9 Argentina Consolidated Mining Co., v. Jolley, Urga, Wirth, Woodbury & Standish, 216 P.3d 779 at  
10 782-83 (Nev. 2009). The Court has subject matter jurisdiction over adjudication of the Law Office's  
11 charging lien. Argentina, 216 P.3d at 783. The Law Office filed a motion requesting adjudication  
12 under NRS 18.015, thus the Court must adjudicate the lien.

#### 13 14 *Fee Agreement*

15 It is undisputed that no express written fee agreement was formed. The Court finds that there  
16 was no express oral fee agreement formed between the parties. An express oral agreement is  
17 formed when all important terms are agreed upon. *See, Loma Linda University v. Eckenweiler*, 469  
18 P.2d 54 (Nev. 1970) (*no oral contract was formed, despite negotiation, when important terms were*  
19 *not agreed upon and when the parties contemplated a written agreement*). The Court finds that the  
20 payment terms are essential to the formation of an express oral contract to provide legal services on  
21 an hourly basis.

22 Here, the testimony from the evidentiary hearing does not indicate, with any degree of  
23 certainty, that there was an express oral fee agreement formed on or about June of 2016. Despite  
24 Brian Edgeworth's affidavits and testimony; the emails between himself and Danny Simon,  
25 regarding punitive damages and a possible contingency fee, indicate that no express oral fee  
26 agreement was formed at the meeting on June 10, 2016. Specifically in Brian Edgeworth's August  
27 22, 2017 email, titled "Contingency," he writes:

1 “We never really had a structured discussion about how this might be done. I  
2 am more than happy to keep paying hourly but if we are going for punitive we  
3 should probably explore a hybrid of hourly on the claim and then some other  
4 structure that incents both of us to win and go after the appeal that these  
5 scumbags will file etc. Obviously that could not have been done earlier since  
6 who would have thought this case would meet the hurdle of punitives at the  
7 start. I could also swing hourly for the whole case (unless I am off what this  
8 is going to cost). I would likely borrow another \$450K from Margaret in 250  
9 and 200 increments and then either I could use one of the house sales for cash  
10 or if things get really bad, I still have a couple million in bitcoin I could sell. I  
11 doubt we will get Kinsale to settle for enough to really finance this since I  
12 would have to pay the first \$750,000 or so back to Colin and Margaret and  
13 why would Kinsale settle for \$1MM when their exposure is only \$1MM?”

14 (Def. Exhibit 27).

15 It is undisputed that when the flood issue arose, all parties were under the impression that Simon  
16 would be helping out the Edgeworths, as a favor.

17 The Court finds that an implied fee agreement was formed between the parties on December  
18 2, 2016, when Simon sent the first invoice to the Edgeworths, billing his services at \$550 per hour,  
19 and the Edgeworths paid the invoice. On July 28, 2017 an addition to the implied contract was  
20 created with a fee of \$275 per hour for Simon’s associates. Simon testified that he never told the  
21 Edgeworths not to pay the bills, though he testified that from the outset he only wanted to “trigger  
22 coverage”. When Simon repeatedly billed the Edgeworths at \$550 per hour for his services, and  
23 \$275 an hour for the services of his associates; and the Edgeworths paid those invoices, an implied  
24 fee agreement was formed between the parties. The implied fee agreement was for \$550 per hour  
25 for the services of Daniel Simon Esq. and \$275 per hour for the services of his associates.

### 26 *Constructive Discharge*

27 Constructive discharge of an attorney may occur under several circumstances, such as:

- 28 • Refusal to communicate with an attorney creates constructive discharge. Rosenberg v. Calderon Automation, 1986 Ohio App. LEXIS 5460 (Jan. 31, 1986).
- Refusal to pay an attorney creates constructive discharge. See e.g., Christian v. All Persons Claiming Any Right, 962 F. Supp. 676 (U.S. Dist. V.I. 1997).

- Suing an attorney creates constructive discharge. See Tao v. Probate Court for the Northeast Dist. #26, 2015 Conn. Super. LEXIS 3146, \*13-14, (Dec. 14, 2015). See also Maples v. Thomas, 565 U.S. 266 (2012); Harris v. State, 2017 Nev. LEXIS 111; and Guerrero v. State, 2017 Nev. Unpubl. LEXIS 472.
- Taking actions that preventing effective representation creates constructive discharge. McNair v. Commonwealth, 37 Va. App. 687, 697-98 (Va. 2002).

Here, the Court finds that the Edgeworths constructively discharged Simon as their lawyer on November 29, 2017. The Edgeworths assert that because Simon has not been expressly terminated, has not withdrawn, and is still technically their attorney of record; there cannot be a termination. The Court disagrees.

On November 29, 2017, the Edgeworths met with the Law Firm of Vannah and Vannah and signed a retainer agreement. The retainer agreement was for representation on the Viking settlement agreement and the Lange claims. (Def. Exhibit 90). This is the exact litigation that Simon was representing the Edgeworths on. This fee agreement also allowed Vannah and Vannah to do all things without a compromise. Id. The retainer agreement specifically states:

Client retains Attorneys to represent him as his Attorneys regarding Edgeworth Family Trust and AMERICAN GRATING V. ALL VIKING ENTITIES and all damages including, but not limited to, all claims in this matter and empowers them to do all things to effect a compromise in said matter, or to institute such legal action as may be advisable in their judgment, and agrees to pay them for their services, on the following conditions:

- a) ...
- b) ...
- c) Client agrees that his attorneys will work to consummate a settlement of \$6,000,000 from the Viking entities and any settlement amount agreed to be paid by the Lange entity. Client also agrees that attorneys will work to reach an agreement amongst the parties to resolve all claims in the Lange and Viking litigation.

Id.

This agreement was in place at the time of the settlement of the Viking and Lange claims. Mr. Simon had already begun negotiating the terms of the settlement agreement with Viking during the week of November 27, 2017 prior to Mr. Vannah's involvement. These negotiated terms were put



1 into a final release signed by the Edgeworths and Mr. Vannah's office on December 1, 2017. (Def.  
2 Exhibit 5). Mr. Simon's name is not contained in the release; Mr. Vannah's firm is expressly  
3 identified as the firm that solely advised the clients about the settlement. The actual language in the  
4 settlement agreement, for the Viking claims, states:

5  
6 PLAINTIFFS represent that their independent counsel, Robert Vannah, Esq.  
7 and John Greene, Esq., of the law firm Vannah & Vannah has explained the  
8 effect of this AGREEMENT and their release of any and all claims, known or  
9 unknown and, based upon that explanation and their independent judgment by  
10 the reading of this Agreement, PLAINTIFFS understand and acknowledge the  
11 legal significance and the consequences of the claims being released by this  
12 Agreement. PLAINTIFFS further represent that they understand and  
acknowledge the legal significance and consequences of a release of unknown  
claims against the SETTLING PARTIES set forth in, or arising from, the  
INCIDENT and hereby assume full responsibility for any injuries, damages,  
losses or liabilities that hereafter may occur with respect to the matters  
released by this Agreement.

13 Id.

14 Also, Simon was not present for the signing of these settlement documents and never explained any  
15 of the terms to the Edgeworths. He sent the settlement documents to the Law Office of Vannah and  
16 Vannah and received them back with the signatures of the Edgeworths.

17 Further, the Edgeworths did not personally speak with Simon after November 25, 2017.  
18 Though there were email communications between the Edgeworths and Simon, they did not verbally  
19 speak to him and were not seeking legal advice from him. In an email dated December 5, 2017,  
20 Simon is requesting Brian Edgeworth return a call to him about the case, and Brian Edgeworth  
21 responds to the email saying, "please give John Greene at Vannah and Vannah a call if you need  
22 anything done on the case. I am sure they can handle it." (Def. Exhibit 80). At this time, the claim  
23 against Lange Plumbing had not been settled. The evidence indicates that Simon was actively  
24 working on this claim, but he had no communication with the Edgeworths and was not advising  
25 them on the claim against Lange Plumbing. Specifically, Brian Edgeworth testified that Robert  
26 Vannah Esq. told them what Simon said about the Lange claims and it was established that the Law  
27 Firm of Vannah and Vannah provided advice to the Edgeworths regarding the Lange claim. Simon  
28

1 and the Law Firm of Vannah and Vannah gave different advice on the Lange claim, and the  
2 Edgeworths followed the advice of the Law Firm of Vannah and Vannah to settle the Lange claim.  
3 The Law Firm of Vannah and Vannah drafted the consent to settle for the claims against Lange  
4 Plumbing (Def. Exhibit 47). This consent to settle was inconsistent with the advice of Simon. Mr.  
5 Simon never signed off on any of the releases for the Lange settlement.

6 Further demonstrating a constructive discharge of Simon is the email from Robert Vannah  
7 Esq. to James Christensen Esq. dated December 26, 2017, which states: "They have lost all faith and  
8 trust in Mr. Simon. Therefore, they will not sign the checks to be deposited into his trust account.  
9 Quite frankly, they are fearful that he will steal the money." (Def. Exhibit 48). Then on January 4,  
10 2018, the Edgeworth's filed a lawsuit against Simon in Edgeworth Family Trust; American Grating,  
11 LLC vs. Daniel S. Simon; the Law Office of Daniel S. Simon, a Professional Corporation d/b/a  
12 Simon Law, case number A-18-767242-C. Then, on January 9, 2018, Robert Vannah Esq. sent an  
13 email to James Christensen Esq. stating, "I guess he could move to withdraw. However, that  
14 doesn't seem in his best interests." (Def. Exhibit 53).

15 The Court recognizes that Simon still has not withdrawn as counsel of record on A-16-  
16 738444-C, the Law Firm of Vannah and Vannah has never substituted in as counsel of record, the  
17 Edgeworths have never explicitly told Simon that he was fired, Simon sent the November 27, 2018  
18 letter indicating that the Edgeworth's could consult with other attorneys on the fee agreement (that  
19 was attached to the letter), and that Simon continued to work on the case after the November 29,  
20 2017 date. The court further recognizes that it is always a client's decision of whether or not to  
21 accept a settlement offer. However the issue is constructive discharge and nothing about the fact  
22 that Mr. Simon has never officially withdrawn from the case indicates that he was not constructively  
23 discharged. His November 27, 2017 letter invited the Edgeworth's to consult with other attorneys  
24 on the fee agreement, not the claims against Viking or Lange. His clients were not communicating  
25 with him, making it impossible to advise them on pending legal issues, such as the settlements with  
26 Lange and Viking. It is clear that there was a breakdown in attorney-client relationship preventing

27 //

1 Simon from effectively representing the clients. The Court finds that Danny Simon was  
2 constructively discharged by the Edgeworths on November 29, 2017.

3  
4 **Adjudication of the Lien and Determination of the Law Office Fee**

5 NRS 18.015 states:

6 1. An attorney at law shall have a lien:

7 (a) Upon any claim, demand or cause of action, including any claim for  
8 unliquidated damages, which has been placed in the attorney's hands by a  
9 client for suit or collection, or upon which a suit or other action has been  
10 instituted.

11 (b) In any civil action, upon any file or other property properly left in the  
12 possession of the attorney by a client.

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

17 3. An attorney perfects a lien described in subsection 1 by serving notice  
18 in writing, in person or by certified mail, return receipt requested, upon his or  
19 her client and, if applicable, upon the party against whom the client has a  
20 cause of action, claiming the lien and stating the amount of the lien.

21 4. A lien pursuant to:

22 (a) Paragraph (a) of subsection 1 attaches to any verdict, judgment or  
23 decree entered and to any money or property which is recovered on account of  
24 the suit or other action; and

25 (b) Paragraph (b) of subsection 1 attaches to any file or other property  
26 properly left in the possession of the attorney by his or her client, including,  
27 without limitation, copies of the attorney's file if the original documents  
28 received from the client have been returned to the client, and authorizes the  
attorney to retain any such file or property until such time as an adjudication  
is made pursuant to subsection 6, from the time of service of the notices  
required by this section.

5. A lien pursuant to paragraph (b) of subsection 1 must not be  
construed as inconsistent with the attorney's professional responsibilities to  
the client.

6. On motion filed by an attorney having a lien under this section, the  
attorney's client or any party who has been served with notice of the lien, the  
court shall, after 5 days' notice to all interested parties, adjudicate the rights of  
the attorney, client or other parties and enforce the lien.

7. Collection of attorney's fees by a lien under this section may be  
utilized with, after or independently of any other method of collection.

1 Nev. Rev. Stat. 18.015.

2 NRS 18.015(2) matches Nevada contract law. If there is an express contract, then the contract terms  
3 are applied. Here, there was no express contract for the fee amount, however there was an implied  
4 contract when Simon began to bill the Edgeworths for fees in the amount of \$550 per hour for his  
5 services, and \$275 per hour for the services of his associates. This contract was in effect until  
6 November 29, 2017, when he was constructively discharged from representing the Edgeworths.  
7 After he was constructively discharged, under NRS 18.015(2) and Nevada contract law, Simon is  
8 due a reasonable fee- that is, quantum meruit.

9  
10 *Implied Contract*

11 On December 2, 2016, an implied contract for fees was created. The implied fee was \$550  
12 an hour for the services of Mr. Simon. On July 28, 2017 an addition to the implied contract was  
13 created with a fee of \$275 per hour for the services of Simon's associates. This implied contract was  
14 created when invoices were sent to the Edgeworths, and they paid the invoices.

15 The invoices that were sent to the Edgeworths indicate that they were for costs and attorney's  
16 fees, and these invoices were paid by the Edgeworths. Though the invoice says that the fees were  
17 reduced, there is no evidence that establishes that there was any discussion with the Edgeworths as  
18 to how much of a reduction was being taken, and that the invoices did not need to be paid. There is  
19 no indication that the Edgeworths knew about the amount of the reduction and acknowledged that  
20 the full amount would be due at a later date. Simon testified that Brian Edgeworth chose to pay the  
21 bills to give credibility to his actual damages, above his property damage loss. However, as the  
22 lawyer/counselor, Simon did not prevent Brian Edgeworth from paying the bill or in any way refund  
23 the money, or memorialize this or any understanding in writing.

24 Simon produced evidence of the claims for damages for his fees and costs pursuant to NRCP  
25 16.1 disclosures and computation of damages; and these amounts include the four invoices that were  
26 paid in full and there was never any indication given that anything less than all the fees had been  
27 produced. During the deposition of Brian Edgeworth it was suggested, by Simon, that all of the fees  
28

1 had been disclosed. Further, Simon argues that the delay in the billing coincides with the timing of  
2 the NRC 16.1 disclosures, however the billing does not distinguish or in any way indicate that the  
3 sole purpose was for the Lange Plumbing LLC claim. Since there is no contract, the Court must  
4 look to the actions of the parties to demonstrate the parties' understanding. Here, the actions of the  
5 parties are that Simon sent invoices to the Edgeworths, they paid the invoices, and Simon Law  
6 Office retained the payments, indicating an implied contract was formed between the parties. The  
7 Court find that the Law Office of Daniel Simon should be paid under the implied contract until the  
8 date they were constructively discharged, November 29, 2017.

9  
10 *Amount of Fees Owed Under Implied Contract*

11 The Edgeworths were billed, and paid for services through September 19, 2017. There is  
12 some testimony that an invoice was requested for services after that date, but there is no evidence  
13 that any invoice was paid by the Edgeworths. Since the Court has found that an implied contract for  
14 fees was formed, the Court must now determine what amount of fees and costs are owed from  
15 September 19, 2017 to the constructive discharge date of November 29, 2017. In doing so, the  
16 Court must consider the testimony from the witnesses at the evidentiary hearing, the submitted  
17 billings, the attached lien, and all other evidence provided regarding the services provided during  
18 this time.

19 At the evidentiary hearing, Ashley Ferrel Esq. testified that some of the items in the billing  
20 that was prepared with the lien "super bill," are not necessarily accurate as the Law Office went back  
21 and attempted to create a bill for work that had been done over a year before. She testified that they  
22 added in .3 hours for each Wiznet filing that was reviewed and emailed and .15 hours for every  
23 email that was read and responded to. She testified that the dates were not exact, they just used the  
24 dates for which the documents were filed, and not necessarily the dates in which the work was  
25 performed. Further, there are billed items included in the "super bill" that was not previously billed  
26 to the Edgeworths, though the items are alleged to have occurred prior to or during the invoice  
27 billing period previously submitted to the Edgeworths. The testimony at the evidentiary hearing  
28

1 indicated that there were no phone calls included in the billings that were submitted to the  
2 Edgeworths.

3 This attempt to recreate billing and supplement/increase previously billed work makes it  
4 unclear to the Court as to the accuracy of this "recreated" billing, since so much time had elapsed  
5 between the actual work and the billing. The court reviewed the billings of the "super bill" in  
6 comparison to the previous bills and determined that it was necessary to discount the items that had  
7 not been previously billed for; such as text messages, reviews with the court reporter, and reviewing,  
8 downloading, and saving documents because the Court is uncertain of the accuracy of the "super  
9 bill."

10 Simon argues that he has no billing software in his office and that he has never billed a client  
11 on an hourly basis, but his actions in this case are contrary. Also, Simon argues that the Edgeworths,  
12 in this case, were billed hourly because the Lange contract had a provision for attorney's fees;  
13 however, as the Court previously found, when the Edgeworths paid the invoices it was not made  
14 clear to them that the billings were only for the Lange contract and that they did not need to be paid.  
15 Also, there was no indication on the invoices that the work was only for the Lange claims, and not  
16 the Viking claims. Ms. Ferrel testified that the billings were only for substantial items, without  
17 emails or calls, understanding that those items may be billed separately; but again the evidence does  
18 not demonstrate that this information was relayed to the Edgeworths as the bills were being paid.  
19 This argument does not persuade the court of the accuracy of the "super bill".

20 The amount of attorney's fees and costs for the period beginning in June of 2016 to  
21 December 2, 2016 is \$42,564.95. This amount is based upon the invoice from December 2, 2016  
22 which appears to indicate that it began with the initial meeting with the client, leading the court to  
23 determine that this is the beginning of the relationship. This invoice also states it is for attorney's  
24 fees and costs through November 11, 2016, but the last hourly charge is December 2, 2016. This  
25 amount has already been paid by the Edgeworths on December 16, 2016.<sup>2</sup>

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26  
27 <sup>2</sup>There are no billing amounts from December 2 to December 4, 2016.  
28

1 The amount of the attorney's fees and costs for the period beginning on December 5, 2016 to  
2 April 4, 2017 is \$46,620.69. This amount is based upon the invoice from April 7, 2017. This  
3 amount has already been paid by the Edgeworths on May 3, 2017.

4 The amount of attorney's fees for the period of April 5, 2017 to July 28, 2017, for the  
5 services of Daniel Simon Esq. is \$72,077.50. The amount of attorney's fees for this period for  
6 Ashley Ferrel Esq. is \$38,060.00. The amount of costs outstanding for this period is \$31,943.70.  
7 This amount totals \$142,081.20 and is based upon the invoice from July 28, 2017. This amount has  
8 been paid by the Edgeworths on August 16, 2017.<sup>3</sup>

9 The amount of attorney's fees for the period of July 31, 2017 to September 19, 2017, for the  
10 services of Daniel Simon Esq. is \$119,762.50. The amount of attorney's fees for this period for  
11 Ashley Ferrel Esq. is \$60,981.25. The amount of attorney's fees for this period for Benjamin Miller  
12 Esq. is \$2,887.50. The amount of costs outstanding for this period is \$71,555.00. This amount  
13 totals \$255,186.25 and is based upon the invoice from September 19, 2017. This amount has been  
14 paid by the Edgeworths on September 25, 2017.

15 From September 19, 2017 to November 29, 2017, the Court must determine the amount of  
16 attorney fees owed to the Law Office of Daniel Simon.<sup>4</sup> For the services of Daniel Simon Esq., the  
17 total amount of hours billed are 340.05. At a rate of \$550 per hour, the total attorney's fees owed to  
18 the Law Office for the work of Daniel Simon Esq. is \$187,027.50. For the services of Ashley Ferrel  
19 Esq., the total amount of hours billed are 337.15. At a rate of \$275 per hour, the total attorney's fees  
20 owed to the Law Office for the work of Ashley Ferrel Esq. from September 19, 2017 to November  
21 29, 2017 is \$92,716.25.<sup>5</sup> For the services of Benjamin Miller Esq., the total amount of hours billed  
22 are 19.05. At a rate of \$275 per hour, the total attorney's fees owed to the Law Office for the work  
23 of Benjamin Miller Esq. from September 19, 2017 to November 29, 2017 is \$5,238.75.<sup>6</sup>

24 The Court notes that though there was never a fee agreement made with Ashley Ferrel Esq.

25  
26 <sup>3</sup> There are no billings from July 28 to July 30, 2017.

27 <sup>4</sup> There are no billings for October 8<sup>th</sup>, October 28-29, and November 5<sup>th</sup>.

28 <sup>5</sup> There is no billing for the October 7-8, October 22, October 28-29, November 4, November 11-12, November 18-19,  
November 21, and November 23-26.

<sup>6</sup> There is no billing from September 19, 2017 to November 5, 2017.

1 or Benjamin Miller Esq., however, their fees were included on the last two invoices that were paid  
2 by the Edgeworths, so the implied fee agreement applies to their work as well.

3 The Court finds that the total amount owed to the Law Office of Daniel Simon for the period  
4 of September 19, 2018 to November 29, 2017 is \$284,982.50.

### 6 *Costs Owed*

7 The Court finds that the Law Office of Daniel Simon is not owed any monies for outstanding  
8 costs of the litigation in Edgeworth Family Trust; and American Grating, LLC vs. Lange Plumbing,  
9 LLC; The Viking Corporation; Supply Network, Inc. dba Viking Supplynet in case number A-16-  
10 738444-C. The attorney lien asserted by Simon, in January of 2018, originally sought  
11 reimbursement for advances costs of \$71,594.93. The amount sought for advanced costs was later  
12 changed to \$68,844.93. In March of 2018, the Edgeworths paid the outstanding advanced costs, so  
13 the Court finds that there no outstanding costs remaining owed to the Law Office of Daniel Simon.

### 15 *Quantum Meruit*

16 When a lawyer is discharged by the client, the lawyer is no longer compensated under the  
17 discharged/breached/repudiated contract, but is paid based on quantum meruit. *See e.g. Golightly v.*  
18 *Gassner*, 281 P.3d 1176 (Nev. 2009) (*unreported*) (*discharged contingency attorney paid by*  
19 *quantum meruit rather than by contingency fee pursuant to agreement with client*); *citing, Gordon v.*  
20 *Stewart*, 324 P.3d 234 (1958) (*attorney paid in quantum meruit after client breach of agreement*);  
21 *and, Cooke v. Gove*, 114 P.2d 87 (Nev. 1941) (*fees awarded in quantum meruit when there was no*  
22 *contingency agreement*). Here, Simon was constructively discharged by the Edgeworths on  
23 November 29, 2017. The constructive discharge terminated the implied contract for fees. William  
24 Kemp Esq. testified as an expert witness and stated that if there is no contract, then the proper award  
25 is quantum meruit. The Court finds that the Law Office of Daniel Simon is owed attorney's fees  
26 under quantum meruit from November 29, 2017, after the constructive discharge, to the conclusion  
27 of the Law Office's work on this case.



1 In determining the amount of fees to be awarded under quantum meruit, the Court has wide  
2 discretion on the method of calculation of attorney fee, to be “tempered only by reason and  
3 fairness”. Albios v. Horizon Communities, Inc., 132 P.3d 1022 (Nev. 2006). The law only requires  
4 that the court calculate a reasonable fee. Shuette v. Beazer Homes Holding Corp., 124 P.3d 530  
5 (Nev. 2005). Whatever method of calculation is used by the Court, the amount of the attorney fee  
6 must be reasonable under the Brunzell factors. Id. The Court should enter written findings of the  
7 reasonableness of the fee under the Brunzell factors. Argentena Consolidated Mining Co., v. Jolley,  
8 Urga, Wirth, Woodbury Standish, 216 P.3d 779, at fn2 (Nev. 2009). Brunzell provides that  
9 “[w]hile hourly time schedules are helpful in establishing the value of counsel services, other factors  
10 may be equally significant. Brunzell v. Golden Gate National Bank, 455 P.2d 31 (Nev. 1969).

11 The Brunzell factors are: (1) the qualities of the advocate; (2) the character of the work to be  
12 done; (3) the work actually performed; and (4) the result obtained. Id. However, in this case the  
13 Court notes that the majority of the work in this case was complete before the date of the  
14 constructive discharge, and the Court is applying the Brunzell factors for the period commencing  
15 after the constructive discharge.

16 In considering the Brunzell factors, the Court looks at all of the evidence presented in the  
17 case, the testimony at the evidentiary hearing, and the litigation involved in the case.

18 *1. Quality of the Advocate*

19 Brunzell expands on the “qualities of the advocate” factor and mentions such items as  
20 training, skill and education of the advocate. Mr. Simon has been an active Nevada trial attorney for  
21 over two decades. He has several 7-figure trial verdicts and settlements to his credit. Craig  
22 Drummond Esq. testified that he considers Mr. Simon a top 1% trial lawyer and he associates Mr.  
23 Simon in on cases that are complex and of significant value. Michael Nunez Esq. testified that Mr.  
24 Simon’s work on this case was extremely impressive. William Kemp Esq. testified that Mr. Simon’s  
25 work product and results are exceptional.

26 *2. The Character of the Work to be Done*

27 The character of the work done in this case is complex. There were multiple parties,  
28

multiple claims, and many interrelated issues. Affirmative claims by the Edgeworths covered the gamut from product liability to negligence. The many issues involved manufacturing, engineering, fraud, and a full understanding of how to work up and present the liability and damages. Mr. Kemp testified that the quality and quantity of the work was exceptional for a products liability case against a world-wide manufacturer that is experienced in litigating case. Mr. Kemp further testified that the Law Office of Danny Simon retained multiple experts to secure the necessary opinions to prove the case. The continued aggressive representation, of Mr. Simon, in prosecuting the case that was a substantial factor in achieving the exceptional results.

3. The Work Actually Performed

Mr. Simon was aggressive in litigating this case. In addition to filing several motions, numerous court appearances, and deposition; his office uncovered several other activations, that caused possible other floods. While the Court finds that Mr. Edgeworth was extensively involved and helpful in this aspect of the case, the Court disagrees that it was his work alone that led to the other activations being uncovered and the result that was achieved in this case. Since Mr. Edgeworth is not a lawyer, it is impossible that it was his work alone that led to the filing of motions and the litigation that allowed this case to develop into a \$6 million settlement. All of the work by the Law Office of Daniel Simon led to the ultimate result in this case.

4. The Result Obtained

The result was impressive. This began as a \$500,000 insurance claim and ended up settling for over \$6,000,000. Mr. Simon was also able to recover an additional \$100,000 from Lange Plumbing LLC. Mr. Vannah indicated to Simon that the Edgeworths were ready so sign and settle the Lange Claim for \$25,000 but Simon kept working on the case and making changes to the settlement agreement. This ultimately led to a larger settlement for the Edgeworths. Recognition is due to Mr. Simon for placing the Edgeworths in a great position to recover a greater amount from Lange. Mr. Kemp testified that this was the most important factor and that the result was incredible. Mr. Kemp also testified that he has never heard of a \$6 million settlement with a \$500,000 damage case. Further, in the Consent to Settle, on the Lange claims, the Edgeworth's acknowledge that they

1 were made more than whole with the settlement with the Viking entities.

2 In determining the amount of attorney's fees owed to the Law Firm of Daniel Simon, the  
3 Court also considers the factors set forth in Nevada Rules of Professional Conduct – Rule 1.5(a)  
4 which states:

5  
6 (a) A lawyer shall not make an agreement for, charge, or collect an  
7 unreasonable fee or an unreasonable amount for expenses. The factors to be  
8 considered in determining the reasonableness of a fee include the following:

9 (1) The time and labor required, the novelty and difficulty of the  
10 questions involved, and the skill requisite to perform the legal service  
11 properly;

12 (2) The likelihood, if apparent to the client, that the acceptance of the  
13 particular employment will preclude other employment by the lawyer;

14 (3) The fee customarily charged in the locality for similar legal  
15 services;

16 (4) The amount involved and the results obtained;

17 (5) The time limitations imposed by the client or by the  
18 circumstances;

19 (6) The nature and length of the professional relationship with the  
20 client;

21 (7) The experience, reputation, and ability of the lawyer or lawyers  
22 performing the services; and

23 (8) Whether the fee is fixed or contingent.

24 NRCP 1.5. However, the Court must also consider the remainder of Rule 1.5 which goes on to state:

25 (b) The scope of the representation and the basis or rate of the fee and  
26 expenses for which the client will be responsible shall be communicated to the  
27 client, preferably in writing, before or within a reasonable time after  
28 commencing the representation, except when the lawyer will charge a  
regularly represented client on the same basis or rate. Any changes in the  
basis or rate of the fee or expenses shall also be communicated to the client.

(c) A fee may be contingent on the outcome of the matter for which the  
service is rendered, except in a matter in which a contingent fee is prohibited  
by paragraph (d) or other law. A contingent fee agreement shall be in writing,  
signed by the client, and shall state, in boldface type that is at least as large as  
the largest type used in the contingent fee agreement:

(1) The method by which the fee is to be determined, including the  
percentage or percentages that shall accrue to the lawyer in the event of  
settlement, trial or appeal;

(2) Whether litigation and other expenses are to be deducted from the  
recovery, and whether such expenses are to be deducted before or after the  
contingent fee is calculated;

- 1 (3) Whether the client is liable for expenses regardless of outcome;  
2 (4) That, in the event of a loss, the client may be liable for the  
3 opposing party's attorney fees, and will be liable for the opposing party's  
4 costs as required by law; and  
5 (5) That a suit brought solely to harass or to coerce a settlement may  
6 result in liability for malicious prosecution or abuse of process.  
7 Upon conclusion of a contingent fee matter, the lawyer shall provide the client  
8 with a written statement stating the outcome of the matter and, if there is a  
9 recovery, showing the remittance to the client and the method of its  
10 determination.

11 NRCP 1.5.

12 The Court finds that under the Brunzell factors, Mr. Simon was an exceptional advocate for  
13 the Edgeworths, the character of the work was complex, the work actually performed was extremely  
14 significant, and the work yielded a phenomenal result for the Edgeworths. All of the Brunzell  
15 factors justify a reasonable fee under NRCP 1.5. However, the Court must also consider the fact  
16 that the evidence suggests that the basis or rate of the fee and expenses for which the client will be  
17 responsible were never communicated to the client, within a reasonable time after commencing the  
18 representation. Further, this is not a contingent fee case, and the Court is not awarding a  
19 contingency fee. Instead, the Court must determine the amount of a reasonable fee. The Court has  
20 considered the services of the Law Office of Daniel Simon, under the Brunzell factors, and the Court  
21 finds that the Law Office of Daniel Simon is entitled to a reasonable fee in the amount of \$200,000,  
22 from November 30, 2017 to the conclusion of this case.

## 23 CONCLUSION

24 The Court finds that the Law Office of Daniel Simon properly filed and perfected the  
25 charging lien pursuant to NRS 18.015(3) and the Court must adjudicate the lien. The Court further  
26 finds that there was an implied agreement for a fee of \$550 per hour between Mr. Simon and the  
27 Edgeworths once Simon started billing Edgeworth for this amount, and the bills were paid. The  
28 Court further finds that on November 29, 2017, the Edgeworth's constructively discharged Mr.  
Simon as their attorney, when they ceased following his advice and refused to communicate with

1 him about their litigation. The Court further finds that Mr. Simon was compensated at the implied  
2 agreement rate of \$550 per hour for his services, and \$275 per hour for his associates; up and until  
3 the last billing of September 19, 2017. For the period from September 19, 2017 to November 29,  
4 2017, the Court finds that Mr. Simon is entitled to his implied agreement fee of \$550 an hour, and  
5 \$275 an hour for his associates, for a total amount of \$284,982.50. For the period after November  
6 29, 2017, the Court finds that the Law Office of Daniel Simon properly perfected their lien and is  
7 entitled to a reasonable fee for the services the office rendered for the Edgeworths, after being  
8 constructively discharged, under quantum meruit, in an amount of \$200,000.

9  
10 **ORDER**

11 It is hereby ordered, adjudged, and decreed, that the Motion to Adjudicate the Attorneys Lien  
12 of the Law Office of Daniel S. Simon is hereby granted and that the reasonable fee due to the Law  
13 Office of Daniel Simon is \$484,982.50.

14 IT IS SO ORDERED this 19 day of November, 2018.

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18 DISTRICT COURT JUDGE  
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Electronically served on all parties as noted in the Court's Master Service List and/or mailed to any party in proper person.

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# Exhibit 2

# Exhibit 2

1 **ORD**

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4 **DISTRICT COURT**  
5 **CLARK COUNTY, NEVADA**

6 EDGEWORTH FAMILY TRUST; and  
7 AMERICAN GRATING, LLC,

8 Plaintiffs,

9 vs.

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

10 LANGE PLUMBING, LLC; THE VIKING  
11 CORPORATION, a Michigan Corporation;  
12 SUPPLY NETWORK, INC., dba VIKING  
13 SUPPLYNET, a Michigan Corporation; and  
DOES 1 through 5; and, ROE entities 6 through

14 Defendants.

**Consolidated with**

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

15 EDGEWORTH FAMILY TRUST; and  
16 AMERICAN GRATING, LLC,

17 Plaintiffs,

18 vs.

**DECISION AND ORDER ON MOTION  
TO DISMISS NRCP 12(B)(5)**

19 DANIEL S. SIMON; THE LAW OFFICE OF  
20 DANIEL S. SIMON, a Professional Corporation  
d/b/a SIMON LAW; DOES 1 through 10; and,  
ROE entities 1 through 10;

21 Defendants.

22 **AMENDED DECISION AND ORDER ON MOTION TO DISMISS NRCP 12(B)(5)**

23  
24 This case came on for an evidentiary hearing August 27-30, 2018 and concluded on  
25 September 18, 2018, in the Eighth Judicial District Court, Clark County, Nevada, the Honorable  
26 Tierra Jones presiding. Defendants and movant, Daniel Simon and Law Office of Daniel S. Simon  
27 d/b/a Simon Law ("Defendants" or "Law Office" or "Simon" or "Mr. Simon") having appeared in  
28 person and by and through their attorneys of record, Peter S. Christiansen, Esq. and James



1 Christensen, Esq. and Plaintiff Edgeworth Family Trust and American Grating, ("Plaintiff" or  
2 "Edgeworths") having appeared through Brian and Angela Edgeworth, and by and through their  
3 attorneys of record, the law firm of Vannah and Vannah, Chtd. Robert Vannah, Esq. and John  
4 Greene, Esq. The Court having considered the evidence, arguments of counsel and being fully  
5 advised of the matters herein, the **COURT FINDS:**

6  
7 **FINDINGS OF FACT**

8 1. The Court finds that the Law Office of Daniel S. Simon represented the Plaintiffs,  
9 Edgeworth Family Trust and American Grating in the case entitled Edgeworth Family Trust and  
10 American Grating v. Viking, et al., case number A-16-738444-C. The representation commenced on  
11 May 27, 2016 when Brian Edgeworth and Daniel Simon Esq. met at Starbucks. This representation  
12 originally began as a favor between friends and there was no discussion of fees, at this point. Mr.  
13 Simon and his wife were close family friends with Brian and Angela Edgeworth.

14 2. The case involved a complex products liability issue.

15 3. On April 10, 2016, a house the Edgeworths were building as a speculation home  
16 suffered a flood. The house was still under construction and the flood caused a delay. The  
17 Edgeworths did not carry loss insurance if a flood occurred and the plumbing company and  
18 manufacturer refused to pay for the property damage. A fire sprinkler installed by the plumber, and  
19 within the plumber's scope of work, caused the flood; however, the plumber asserted the fire  
20 sprinkler was defective and refused to repair or to pay for repairs. The manufacturer of the sprinkler,  
21 Viking, et al., also denied any wrongdoing.

22 4. In May of 2016, Mr. Simon agreed to help his friend with the flood claim and to send  
23 a few letters. The parties initially hoped that Simon drafting a few letters to the responsible parties  
24 could resolve the matter. Simon wrote the letters to the responsible parties, but the matter did not  
25 resolve. Since the matter was not resolved, a lawsuit had to be filed.

26 5. On June 14, 2016, a complaint was filed in the case of Edgeworth Family Trust; and  
27 American Grating LLC vs. Lange Plumbing, LLC; the Viking Corporation; Supply Network Inc.,  
28

1 dba Viking Supplynet, in case number A-18-738444-C. The cost of repairs was approximately  
2 \$500,000. One of the elements of the Edgeworth's damages against Lange Plumbing LLC ("Lange")  
3 in the litigation was for reimbursement of the fees and costs that were paid by the Edgeworths.

4 6. On August 9, 2017, Mr. Simon and Brian Edgeworth traveled to San Diego to meet  
5 with an expert. As they were in the airport waiting for a return flight, they discussed the case, and  
6 had some discussion about payments and financials. No express fee agreement was reached during  
7 the meeting. On August 22, 2017, Brian Edgeworth sent an email to Simon entitled "Contingency."  
8 It reads as follows:

9 We never really had a structured discussion about how this might be done.  
10 I am more that happy to keep paying hourly but if we are going for punitive  
11 we should probably explore a hybrid of hourly on the claim and then some  
12 other structure that incents both of us to win an go after the appeal that these  
13 scumbags will file etc.  
14 Obviously that could not have been doen earlier snce who would have though  
15 this case would meet the hurdle of punitives at the start.  
16 I could also swing hourly for the whole case (unless I am off what this is  
17 going to cost). I would likely borrow another \$450K from Margaret in 250  
18 and 200 increments and then either I could use one of the house sales for cash  
19 or if things get really bad, I still have a couple million in bitcoin I could sell.  
20 I doubt we will get Kinsale to settle for enough to really finance this since I  
21 would have to pay the first \$750,000 or so back to Colin and Margaret and  
22 why would Kinsale settle for \$1MM when their exposure is only \$1MM?

23 (Def. Exhibit 27).

24 7. During the litigation, Simon sent four (4) invoices to the Edgeworths. The first  
25 invoice was sent on December 2, 2016, seven (7) months after the original meeting at Starbucks.  
26 This invoice indicated that it was for attorney's fees and costs through November 11, 2016. (Def.  
27 Exhibit 8). The total of this invoice was \$42,564.95 and was billed at a "reduced" rate of \$550 per  
28 hour. Id. The invoice was paid by the Edgeworths on December 16, 2016.

8. On April 7, 2017 a second invoice was sent to the Edgeworths for attorney's fees and  
costs through April 4, 2017 for a total of \$46,620.69, and was billed at a "reduced" rate of \$550 per  
hour. (Def. Exhibit 9). This invoice was paid by the Edgeworths on May 3, 2017. There was no

1 indication on the first two invoices if the services were those of Mr. Simon or his associates; but the  
2 bills indicated an hourly rate of \$550.00 per hour.

3 9. A third invoice was sent to the Edgeworths on July 28, 2017 for attorney's fees and  
4 costs through July 28, 2017 totaling of \$142,080.20. (Def. Exhibit 10). This bill identified services  
5 of Daniel Simon Esq. for a "reduced" rate of \$550 per hour totaling \$104,021.20; and services of  
6 Ashley Ferrel Esq. for a "reduced" rate of \$275 per hour totaling \$37,959.00. Id. This invoice was  
7 paid by the Edgeworths on August 16, 2017.

8 10. The fourth invoice was sent to the Edgeworths on September 19, 2017 in an amount  
9 of \$255,186.25 for attorney's fees and costs; with \$191,317.50 being calculated at a "reduced" rate  
10 of \$550 per hour for Daniel Simon Esq., \$60,981.25 being calculated at a "reduced" rate of \$275 per  
11 hour for Ashley Ferrel Esq., and \$2,887.50 being calculated at a "reduced" rate of \$275 per hour for  
12 Benjamin Miller Esq. (Def. Exhibit 11). This invoice was paid by the Edgeworths on September  
13 25, 2017.

14 11. The amount of attorney's fees in the four (4) invoices was \$367,606.25, and  
15 \$118,846.84 in costs; for a total of \$486,453.09.<sup>1</sup> These monies were paid to Daniel Simon Esq. and  
16 never returned to the Edgeworths. The Edgeworths secured very high interest loans to pay fees and  
17 costs to Simon. They made Simon aware of this fact.

18 12. Between June 2016 and December 2017, there was a tremendous amount of work  
19 done in the litigation of this case. There were several motions and oppositions filed, several  
20 depositions taken, and several hearings held in the case.

21 13. On the evening of November 15, 2017, the Edgeworth's settled their claims against  
22 the Viking Corporation ("Viking").

23 14. Also on November 15, 2017, Brian Edgeworth sent an email to Simon asking for the  
24 open invoice. The email stated: "I know I have an open invoice that you were going to give me at a  
25 mediation a couple weeks ago and then did not leave with me. Could someone in your office send  
26

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27 <sup>1</sup> \$265,677.50 in attorney's fees for the services of Daniel Simon; \$99,041.25 for the services of Ashley Ferrel; and  
28 \$2,887.50 for the services of Benjamin Miller.

1 Peter (copied here) any invoices that are unpaid please?" (Def. Exhibit 38).

2 15. On November 17, 2017, Simon scheduled an appointment for the Edgeworths to  
3 come to his office to discuss the litigation.

4 16. On November 27, 2017, Simon sent a letter with an attached retainer agreement,  
5 stating that the fee for legal services would be \$1,500,000 for services rendered to date. (Plaintiff's  
6 Exhibit 4).

7 17. On November 29, 2017, the Edgeworths met with the Law Office of Vannah &  
8 Vannah and signed a retainer agreement. (Def. Exhibit 90). On this date, they ceased all  
9 communications with Mr. Simon.

10 18. On the morning of November 30, 2017, Simon received a letter advising him that the  
11 Edgeworths had retained the Vannah Law Firm to assist in the litigation with the Viking entities,  
12 et.al. The letter read as follows:

13 "Please let this letter serve to advise you that I've retained Robert D. Vannah,  
14 Esq. and John B. Greene, Esq., of Vannah & Vannah to assist in the litigation  
15 with the Viking entities, et.al. I'm instructing you to cooperate with them in  
16 every regard concerning the litigation and any settlement. I'm also instructing  
17 you to give them complete access to the file and allow them to review  
18 whatever documents they request to review. Finally, I direct you to allow  
19 them to participate without limitation in any proceeding concerning our case,  
20 whether it be at depositions, court hearings, discussions, etc."

21 (Def. Exhibit 43).

22 19. On the same morning, Simon received, through the Vannah Law Firm, the  
23 Edgeworth's consent to settle their claims against Lange Plumbing LLC for \$25,000.

24 20. Also on this date, the Law Office of Danny Simon filed an attorney's lien for the  
25 reasonable value of its services pursuant to NRS 18.015. (Def. Exhibit 3). On January 2, 2018, the  
26 Law Office filed an amended attorney's lien for the sum of \$2,345,450, less payments made in the  
27 sum of \$367,606.25, for a net lien in the sum of \$1,977,843.80. This lien includes court costs and  
28 out-of-pocket costs advanced by the Law Office of Daniel S. Simon in the sum of \$76,535.93.

21. Mr. Edgeworth alleges that the fee agreement with Simon was only for an hourly

1 express agreement of \$550 an hour; and that the agreement for \$550 an hour was made at the outset  
2 of the case. Mr. Simon alleges that he worked on the case always believing he would receive the  
3 reasonable value of his services when the case concluded. There is a dispute over the reasonable fee  
4 due to the Law Office of Danny Simon.

5 22. The parties agree that an express written contract was never formed.

6 23. On December 7, 2017, the Edgeworths signed a Consent to Settle their claims against  
7 Lange Plumbing LLC for \$100,000.

8 24. On January 4, 2018, the Edgeworth Family Trust filed a lawsuit against Simon in  
9 Edgeworth Family Trust; American Grating LLC vs. Daniel S. Simon, the Law Office of Daniel S.  
10 Simon, a Professional Corporation, case number A-18-767242-C.

11 25. On January 24, 2018, the Law Office of Danny Simon filed a Motion to Adjudicate  
12 Lien with an attached invoice for legal services rendered. The amount of the invoice was  
13 \$692,120.00. The Court set an evidentiary hearing to adjudicate the lien.

## 14 15 **CONCLUSION OF LAW**

### 16 ***Breach of Contract***

17 The First Claim for Relief of the Amended Complaint alleges breach of an express oral  
18 contract to pay the law office \$550 an hour for the work of Mr. Simon. The Amended Complaint  
19 alleges an oral contract was formed on or about May 1, 2016. After the Evidentiary Hearing, the  
20 Court finds that there was no express contract formed, and only an implied contract. As such, a  
21 claim for breach of contract does not exist and must be dismissed as a matter of law.

### 22 23 ***Declaratory Relief***

24 The Plaintiff's Second Claim for Relief is Declaratory Relief to determine whether a contract  
25 existed, that there was a breach of contract, and that the Plaintiffs are entitled to the full amount of  
26 the settlement proceeds. The Court finds that there was no express agreement for compensation, so  
27 there cannot be a breach of the agreement. The Plaintiffs are not entitled to the full amount of the  
28

1 settlement proceeds as the Court has adjudicated the lien and ordered the appropriate distribution of  
2 the settlement proceeds, in the Decision and Order on Motion to Adjudicate Lien. As such, a claim  
3 for declaratory relief must be dismissed as a matter of law.

#### 4 5 *Conversion*

6 The Third Claim for Relief is for conversion based on the fact that the Edgeworths believed  
7 that the settlement proceeds were solely theirs and Simon asserting an attorney's lien constitutes a  
8 claim for conversion. In the Amended Complaint, Plaintiffs allege "The settlement proceeds from  
9 the litigation are the sole property of the Plaintiffs." Amended Complaint, P. 9, Para. 41.

10 Mr. Simon followed the law and was required to deposit the disputed money in a trust  
11 account. This is confirmed by David Clark, Esq. in his declaration, which remains undisputed. Mr.  
12 Simon never exercised exclusive control over the proceeds and never used the money for his  
13 personal use. The money was placed in a separate account controlled equally by the Edgeworth's  
14 own counsel, Mr. Vannah. This account was set up at the request of Mr. Vannah.

15 When the Complaint was filed on January 4, 2018, Mr. Simon was not in possession of the  
16 settlement proceeds as the checks were not endorsed or deposited in the trust account. They were  
17 finally deposited on January 8, 2018 and cleared a week later. Since the Court adjudicated the lien  
18 and found that the Law Office of Daniel Simon is entitled to a portion of the settlement proceeds,  
19 this claim must be dismissed as a matter of law.

#### 20 21 *Breach of the Implied Covenant of Good Faith and Fair Dealing*

22 The Fourth Claim for Relief alleges a Breach of the Implied Covenant of Good Faith and  
23 Fair Dealing based on the time sheets submitted by Mr. Simon on January 24, 2018. Since no  
24 express contract existed for compensation and there was not a breach of a contract for compensation,  
25 the cause of action for the breach of the covenant of good faith and fair dealing also fails as a matter  
26 of law and must be dismissed.

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11 ***Breach of Fiduciary Duty***

12 The allegations in the Complaint assert a breach of fiduciary duty for not releasing all the  
13 funds to the Edgeworths. The Court finds that Mr. Simon followed the law when filing the attorney's  
14 lien. Mr. Simon also fulfilled all his obligations and placed the clients' interests above his when  
15 completing the settlement and securing better terms for the clients even after his discharge. Mr.  
16 Simon timely released the undisputed portion of the settlement proceeds as soon as they cleared the  
17 account. The Court finds that the Law Office of Daniel Simon is owed a sum of money based on the  
18 adjudication of the lien, and therefore, there is no basis in law or fact for the cause of action for  
19 breach of fiduciary duty and this claim must be dismissed.  
20

21 ***Punitive Damages***

22 Plaintiffs' Amended Complaint alleges that Mr. Simon acted with oppression, fraud, or  
23 malice for denying Plaintiffs of their property. The Court finds that the disputed proceeds are not  
24 solely those of the Edgeworths and the Complaint fails to state any legal basis upon which claims  
25 may give rise to punitive damages. The evidence indicates that Mr. Simon, along with Mr. Vannah  
26 deposited the disputed settlement proceeds into an interest bearing trust account, where they remain.  
27 Therefore, Plaintiffs' prayer for punitive damages in their Complaint fails as a matter of a law and  
28 must be dismissed.

**CONCLUSION**

21 The Court finds that the Law Office of Daniel Simon properly filed and perfected the  
22 charging lien pursuant to NRS 18.015(3) and the Court adjudicated the lien. The Court further finds  
23 that the claims for Breach of Contract, Declaratory Relief, Conversion, Breach of the Implied  
24 Covenant of Good Faith and Fair Dealing, Breach of the Fiduciary Duty, and Punitive Damages  
25 must be dismissed as a matter of law.

26 //

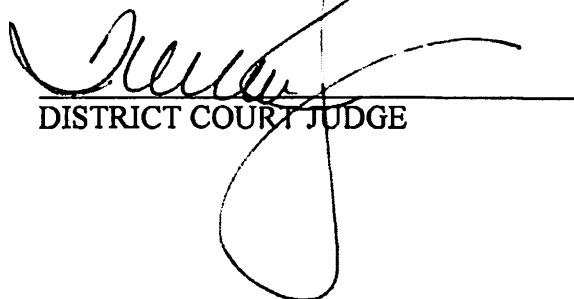
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**ORDER**

It is hereby ordered, adjudged, and decreed, that the Motion to Dismiss NRCP 12(b)(5) is GRANTED.

IT IS SO ORDERED this 19 day of November, 2018.

  
DISTRICT COURT JUDGE



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Electronically served on all parties as noted in the Court's Master Service List and/or mailed to any party in proper person.

WA02067

**INVOICE FOR DANIEL S. SIMON**  
***EDGEWORTH v. LANGE, ET AL.***

<b>Date</b>	<b>Description</b>	<b>Time</b>
5/27/16	Email Chain with Client Re: Representation	.25
5/28/16	Email Chain with Client Re: Client Meeting	.40
5/31/16	Receive, Review and Analyze Email From Client	.40
6/1/16	Receive, Review and Analyze Email From Client	.40
6/2/16	Receive, Review and Analyze Email From Client	.40
6/2/16	Email Chain with Client	.40
6/3/16	Email Chain with Client with Attachment	.50
6/3/16	Email Chain From Client with Website Attachment	.40
6/3/16	Receive, Review and Analyze Email from Viking and to Client	.40
6/5/16	Email Chain with Client	.40
6/10/16	Email Chain with Client	.75
6/13/16	Draft and Send Email to Client	.25
6/14/16	Receive, Review and Analyze Email from Client	.25
6/22/16	Email Chain with Client	.40
7/11/16	Email Chain with AD, SC, SR; Re: Representation of Lange	.25
7/12/16 - 7/13/16	Email Chain with Client	1.25
7/14/16	Receive, Review and Analyze Email from Client	.25
7/14/16	Receive, Review and Analyze Email from Viking, Forward to Client with Attachments; Receive, Review and Analyze Response from Client; Review File; Email Chain with Client	1.75
7/18/16	Receive, Review and Analyze Email from Client with Attachment	.75
7/19/16	Email Chain with Client	.50
7/19/16	Draft and Send Email to AD; Re: SAO Amend Complaint	.25

7/20/16	Email Chain with SH, AD with Attachments; Re: Stipulation to Amend and Extension	.50
8/4/16	Receive, Review and Analyze Email from Client	.40
8/4/16	Receive, Review and Analyze Email from Client	.25
8/4/16 - 8/5/16	Receive, Review and Analyze Emails from M. Giberti	.50
8/5/16 - 8/8/16	Email Chain with Client	.75
8/9/16	Call with Client	.25
8/11/16	Receive, Review and Analyze Email from Dalacas with Report; Forward to Client	.40
8/11/16	Receive, Review and Analyze Emails from Giberti with Attachment	.75
8/11/16	Email Chain with A. Dalacas, Scott Holcomb; Re: Rimkus Report with Attachment	.75
8/11/16	Email Chain with SH, AD, GB; Re: Stipulations	.25
8/11/16	Email Chain with AD, SH; Re: Home Inspection	1.25
8/15/16	Email Chain with Client	.25
8/15/16 (9:21am)	Receive, Review and Analyze Email from Client with Attachment	.40
8/16/16	Email Chain with SH, AD, GB; Re: Chain of Custody	.25
8/16/16	Draft and Send Email to AD; Re: Lange Coverage	.40
8/16/16	Email Chain with Client	.40
8/19/16	Email Chain with AD; Re: Inspection	.25
8/19/16	Email Chain with Client	.40
8/22/16 - 8/24/16	Email Chain with Client	.40
8/22/16	Call with Client	.15
8/25/16	Call with Client	.15
9/1/16	Email Chain with AD, SH; Re: Transfer of Sprinkler Heads and Chain of Custody	.75

9/7/16	Email Chain with Client with Attachment	.75
9/8/16	Email Chain with Client	.75
9/12/16	Call with Client	.15
9/12/16	Email Chain from Ivey with Attachments; Email Chain with Client	.50
9/12/16	Email Chain with RP, KH, GR with Attachments; Re: Retention	1.25
9/14/16	Email Chain with RP, KH; Re: Retention and Telephone Call with Bill Ivey Re: Retention	1.35
9/15/16	Email Chain with RP; Re: List of Cases	.50
9/16/16	Email Chain with RP; Re: Signed Retainer Agreement and Check	.50
9/19/16	Email Chain with RP, KH; Re: Shipping of Sprinklers from Rimkus. Telephone Call with Hastings.	.75
9/22/16	Receive, Review and Analyze Email From AD with Attachment from Kreason	.40
9/28/16	Email Chain with Client	.50
9/28/16	Email Chain with Client Re: Installation Guide Info., with Attachments	.75
9/28/16	Call with Client	.40
9/29/16	Draft Email to JW	.10
9/29/16	Receive, Review and Analyze Email from Dalacas	.25
9/30/16	Receive, Review and Analyze Emails with Website Info.; Receive, Review and Analyze Email from B. Lange and Client; Draft Email to JW	.85
10/3/16	Email Chain with Client	.50
10/4/16	Call with Client	.25
10/4/16	Call with Client	.15
10/4/16	Email Chain with Client	.50
10/6/16	Receive, Review and Analyze Email from Client with Attachment	.50

10/6/16	Receive, Review and Analyze Email from Dalacas; Forward Email to Client; Receive, Review and Analyze Email from Client; Receive, Review and Analyze Email from B. Lange; S. Simmons Emails included	.75
10/6/16	Call with Client	.40
10/7/16	Call with Client	.15
10/7/16	Receive, Review and Analyze Email from Client	.50
10/7/16	Receive, Review and Analyze Email from Giberti	.25
10/7/16	Draft Email to Dalacas; Forward Email to Client	.75
10/11/16	Receive, Review and Analyze Email from Client	.25
10/11/16	Draft Email to Dalacas with Attachments	.25
10/12/16	Email Chain with KB, KH, and File Manager; Re: Travel for Inspection	.50
10/12/16	Call with Client	.15
10/12/16	Call with Client	.10
10/12/16	Call with Client	.25
10/13/16	Call with Client	.40
10/13/16	Receive, Review and Analyze Email from Client	.25
10/13/16	Email Chain with S. Holcomb and Dalacas and Client	1.25
10/13/16	Receive, Review and Analyze Emails from Client with Email Chain from Viking/Lange	.50
10/13/16	Receive, Review and Analyze Email from Client	.25
10/14/16	Email Chain with Client	.50
10/14/16	Receive, Review and Analyze Email from M. Giberti with Attachments; Forward Emails	1.25
10/14/16	Email Chain with Client	.75
10/15/16	Call with Client	.25
10/15/16	Draft Email to Client with Attachments	.25

10/15/16	Draft and Send Email to KH; Re: Sprinkler Heads to Take Back to San Diego	.15
10/15/16	Prepare, Revise and Finalize Affidavit for DSS, Re: Chain of Custody	.50
10/16/16	Receive, Review and Analyze Email from Client	.40
10/17/16	Receive, Review and Analyze Email from M. Giberti	.40
10/17/16	Receive, Review and Analyze Email from Client	.40
10/17/16	Receive, Review and Analyze Email from Dalascas; Email Chain with Client; Email from S. Holcomb; Email to Client	.90
10/17/16	Receive, Review and Analyze Email from M. Giberti	.15
10/17/16	Email Chain with Client Re: Website	.40
10/17/16	Receive, Review, and Analyze Letter from Dalacas	.25
10/18/16	Email Chain with Client Re: Dalacas Ladder	.50
10/18/16	Call with Client	.15
10/ 19/16	Call with Client	.10
10/19/16	Call with Client	.10
10/20/16	Email Chain with KH; Re: Receipt of Sprinkler Heads	.25
10/21/16	Call with Client	.25
10/21/16	Email Chain with Client and Dalacas with Attachments	1.25
10/22/16 - 10/24/16	Email Chain with Dalacas and Client	1.25
10/24/16	Call with Client	.15
10/24/16	Email Chain with Dalacas/Holcomb, A. Bullock and Client with Attachments	.75
10/25/16	Receive, Review and Analyze Email from Client	.50
10/26/16	Send Email Chain with Client; Receive, Review and Analyze Email from Dalacas with Attachments	.75
11/4/16	Email Chain with Client; Email Chain with Dalacas	.80

11/9/16	Email Chain with Client with Attachment	.50
11/9/16	Draft and Send Email to KH with ECC Disclosures	.35
11/10/16	Email Chain with KH; Re: Visual Inspection of Sprinklers	.25
11/10/16	Receive, Review and Analyze Email from M. Giberti	.25
11/17/16	Email Chain with Client and Dalacas	.75
11/18/16	Email Chain with Dalacas	.40
11/18/16	Email Chain with Client with Attachment	1.0
11/21/16	Receive, Review and Analyze Email from Client	.25
11/21/16	Call with Client	.25
11/22/16	Draft and Send Email to Dalacas and Client	.40
11/29/16	Email Chain with M. Giberti and Client	.75
11/29/16	Draft and Send Email to Dalacas	.50
11/29/16	Email Chain with Client	.40
11/30/16	Receive, Review and Analyze Email from Dalacas; Draft and Email Chain with Client	.50
11/30/16	Receive, Review and Analyze Email from M. Giberti and Client	.50
12/2/16	Email Chain with Client with Attachments	.75
12/2/16	Receive, Review and Analyze Email from Ivey and Forward to Client	.25
12/2/16	Call with Client	.50
12/3/16	Call with Client	.25
12/5/16	Receive, Review and Analyze Email from M. Giberti	.35
12/5/16	Receive, Review and Analyze Email from Client	.25
12/5/16	Draft and Send Email to Duggan with Attachments	.50
12/5/16	T/C with Duggan	.40
12/5/16	Draft and Send Email to Dalacas	.75
12/5/16	Receive, Review and Analyze Email from Dalacas	.40

12/5/16	Receive, Review and Analyze Email from Client with Attachment Re: Updated Damages Estimate	.40
12/6/16	Email Chain with Client with Attachments	.50
12/6/16	Receive, Review and Analyze Email from Dalacas; Forward to Client; Receive, Review and Analyze Email from M. Giberti	.40
12/7/16	Receive, Review and Analyze Email from M. Giberti	.25
12/13/16	Email Chain with JY, KH; Re: Retainer with Attachment	.75
12/22/16	Email Chain with AD; Re: Mediation	.25
1/3/17	Email Chain with KH; Re: Visual Inspection in San Diego	.25
1/3/17	Email Chain with Blumberg	.35
1/4/17	Email Chain with JP and AD	.75
1/4/17	Receive, Review and Analyze Email From JP; Re: Mediation	.15
1/4/17	Receive, Review and Analyze Email from JW to Pancoast; Receive, Review and Analyze Email from JP; Receive, Review and Analyze Email from Dalacas	.50
1/4/17	Draft email to JP and Receive and Review Email from JP	.40
1/4/17	Draft and Send Email to Client	.50
1/4/17	Email Chain with Client	.75
1/6/17	Received, reviewed and responded to email from AF Lange K inserts added to MSJ	.15
1/10/17	Draft and Send Email to Client with Attachment	.25
1/10/17	Email Chain with KH; Re: Metallurgist	.50
1/11/17	Call with Client	.15
1/11/17	Call with Client	.25
1/11/17	Draft and send email to AF re making small changes to MSJ	.15
1/11/17	Email Chain with Client with attachment	.25
1/17/17	Draft and Send Email to JP and Response	.25
1/17/17	Draft and Send Email to GZ	.15



1/17/17	Draft and send email to AF re preparing written discovery and depo notices	.15
1/19/17	Draft and Send Email to KH with Attachment MSJ; Re: Request for Call	.20
1/19/17	Email chain with AF re Viking's Opposition to MSJ	.50
1/20/17	Email chain with AF re Stackiewicz case and Discussion with AF	.50
1/23/17	Received, reviewed and responded to email from AF re business court judge	.15
1/23/17	Received, reviewed and responded to email from AF re draft notices and SDT for review	.15
1/24/17	Call with Client	.15
1/24/17	Email chain with AF re business court jurisdiction and discussion with AF	.35
1/24/17	Email chain with AF re breach of contract COAs and discussion with AF	.50
1/24/17	Receive, Review and Analyze Email from M. Giberti	.25
1/24/17	Review COR Depositions and Forward to Client via Email	.50
1/24/17	Receive, Review and Analyze Email from G. Zamiski; Email Chain with Client	.50
1/24/17	Receive, Review and Analyze Email From GZ; Re: Scope of Work	.15
1/25/17	Draft and Send Email to GZ; Re: Starting Work and Retainer	.25
1/25/17	Draft and Send Email to AF and JW; Objection to Subpoena; Review of COR's, Analyze Objections	.50
1/25/17	Email Chain with AD, AF; Re: Depositions	.25
1/26/17	Draft and send email to AF re Lange 30(b)(6) depo and discussion with AF	.35
1/27/17	Email Chain with Client with Attachments	.50
1/27/17	Draft and Send Email to Client with Attachment	.25
1/27/17	Call with Client	.25

1/27/17	Draft and send email to AF re preparing Viking 30(b)(6) depo notice	.15
1/28/17	Draft and Send Email to KH; Re: Ziminsky, Depositions, Request to Discuss Case	.25
1/28/17	Draft and Send Email to KH with Viking 16.1 Disclosures	.25
1/30/17	Call with AMF	.15
1/30/17	Receive, Review and Analyze Email from M. Giberti	.25
1/31/17	Email Chain with Client	.25
2/1/17	Receive, Review and Analyze Email from Client	.25
2/3/17	Receive, Review and Analyze Email from Client with Attachment	.25
2/3/17	Receive, Review and Analyze Email From KH; Re: Viking Expert Opinions and Request for a TC	.15
2/3/17	Receive, Review and Analyze Email from Client to S. Dugan	.25
2/6/17	Receive, Review and Analyze Email from S. Dugan and Response	.25
2/6/17	Receive, Review and Analyze Email from Client Re: Trailer Temps and Website Attachment	.50
2/6/17	Draft and send email to AF re email client sent re trailer temperatures and link	.50
2/6/17	Call with Client	.40
2/6/17	Email chain with AF re Motion to Amend Complain	.15
2/6/17	Draft and Send Email to JP	.25
2/7/17	Receive, Review and Analyze Email From JP and Response	.25
2/7/17	Draft and send email to AF re Viking 30(b)(6) notice	.15
2/9/17	Receive, Review and Analyze Letter from Dalacas re Lange 30(b)(6) depositions	.25
2/9/17	Call with Client	.15
2/10/17	Receive, Review and Analyze Letter from Dalacas re Lange 30(b)(6) depositions and Brandon Lange Deposition	.15
2/10/17	Email chain with AF re response to Pancoast re Dustin Hamer	.15

2/10/17	Draft and send email to AF re correspondence from Sia about moving depos	.15
2/10/17	Receive, Review and Analyze Email From JP and Response	.25
2/10/17	Email Chain with JP and AD	.95
2/12/17	Email chain with AF re re-noticing depos of Hamer and Diorio	.25
2/13/17	Email chain with AF re court's availability for MSJ hearing	.15
2/13/17	Call with Client	.15
2/13/17	Email Chain with AD, JP and JR	.35
2/15/17	Call with AMF	.40
2/15/17	Draft and Send Email to AD and JP	.25
2/15/17	Email Chain with AD, JP and AF; Re: Depositions	.25
2/15/17	Draft and send email to AF re document needing to be supplemented (attachment)	.25
2/15/17	Draft and send email to AF re noticing depos of Lange employees	.15
2/15/17	Receive, Review and Analyze Email from M. Giberti with Attached Letter	.50
2/17/17	Receive, Review and Analyze Email From JP; Re: Depositions	.25
2/21/17	Draft and send email to AF to print Exhibits 1-8	.15
2/21/17	Email chain with AF re exhibits for Dustin Hamer depo	.15
2/22/17	Email Chain with Client; T/C with Dalacas	.50
2/25/17	Email Chain with Client	.25
2/26/17	Received, reviewed and responded to email from AF re draft reply to motion to amend	.15
2/27/17	Email chain with AF re COR Depos for Giberti and American Grating	.15
2/27/17	Draft and Send Email to AD; Re: Kreason	.15
2/28/17	Receive, Review and Analyze Email From AD; Re: Kreason	.15
2/28/17	Receive, Review and Analyze Email From AD; Re: Kreason	.15

2/28/17	Receive, Review and Analyze Email from Client with Attachment	.75
2/28/17	Call with Client	.25
2/28/17	Call with Client	.10
2/28/17	Call with AMF	.15
2/28/17	Call with AMF	.10
2/28/17	Call with AMF	.15
2/28/17	Draft and Send Email to JP	.25
3/1/17	Received, reviewed and responded to email from AF re Pancoast coming to office to review documents	.15
3/1/17	Call with AMF	.15
3/1/17	Call with Client	.15
3/1/17	Call with Client	.10
3/1/17	Received, reviewed and responded to email from AF re Edgeworth trial order	.15
3/2/17	Draft and Send Email to Client with Attachment	.25
3/7/17	Email Chain with AF, AD and JP; Re: Orders	.15
3/7/17	Email Chain with AD; Re: Brandon Lange Deposition	.35
3/7/17	Email Chain with AF, AD, JW; Re: Calculation of Damages	.35
3/8/17	Email Chain with AD, JW, AF, JP; Re: Depositions	.30
3/8/17	Email Chain with JP, AF, AD; Re: Motions To Amend	.15
3/9/17 -3/14/17	Email Chain with AD, JW, AF, JP; Re: Deposition	.95
3/9/17	Call with Client	.15
3/10/17	Call with Client	.15
3/10/17	Email chain with AF re letter from Sia on withdrawing MSJ and her signature on proposed orders	.25
3/13/17	Receive, Review and Analyze Email from Dalacas; Forward Email to Client with Attachment	.65

3/13/17	Text Message with AMF	.10
3/13/17	Call with AMF	.10
3/13/17	Call with AMF	.15
3/13/17	Call with Client	.15
3/14/17	Call with Client	.65
3/14/17	Email Chain with Client with Attachments	.50
3/15/17	Call with AMF	.10
3/15/17	Call with AMF	.15
3/15/17	Call with AMF	.25
3/16/17	Email Chain with Client	.40
3/16/17	Email Chain with AD, AF, JP; Re: Bate Stamps	.15
3/17/17	Receive, Review and Analyze Email From AD; Re: OOO	.25
3/17/17	Email Chain with AD, AF; Re: OJ	.15
3/17/17	Email chain with AF re extension for Lange's response to OOO	.25
3/20/17	Email Chain with AD, AF; Re: Bate Stamp	.25
3/20/17	Draft and Send Email to Client with Attachment	.25
3/21/17	Email chain with AF re documents attached to supplement and review of the Kinsale file	.15
3/21/17	Email Chain with AF, AD, JP; Re: Bate Stamps	.25
3/24/17	Email Chain with AF, AD, JW; Re: Service	.50
3/24/17	Receive, Review and Analyze Email from JP; Forward Email to Client	.65
3/27/17	Email Chain with JF, AD, LV, LF; Re: Lawyer Contact	.25
3/28/17	Review Lange 5 <sup>th</sup> Supp and Email Chain with Client	.50
3/29/17	Email Chain with Client	.25
3/29/17	Call with AMF	.15
3/29/17	Call with AMF	.15

3/29/17	Call with AMF	.10
3/29/17	Email Chain with Client	.25
3/31/17	Call with AMF	.15
3/31/17	Email Chain with JP, AF, JR, TG, AD; Re: Deposition of Viking	.15
4/3/17	Email Chain with AD, JP, JW, JR; Re: Depositions	.50
4/3/17	Receive, Review and Analyze Email from Client with Attachment	.25
4/4/17	Receive, Review and Analyze Email from Client	.15
4/5/17	Email chain with AF re exhibits he needs for Kreason and Brandon Lange depo	.15
4/6/17	Received, reviewed and responded to email from AF re: 3 day notice of intent to default Lange and discussion with AF	.50
4/6/17	Receive, Review and Analyze Questions Email from Client	.50
4/6/17	Email Chain with Client	.25
4/6/17	Draft and Send Email to KH with Attachments; Re: Visual Inspection	.25
4/6/17	Receive, Review and Analyze Email from Client with Attachment	.25
4/6/17	Email Chain with Client	.25
4/6/17 - 4/20/17	Email Chain with AD, JP; Re: Inspection of Sprinklers	.65
4/6/17	Email Chain with AD, AF; Re: Testing of Heads	.15
4/7/17	Receive, Review and Analyze Email from Client with Attachment	.50
4/7/17	Receive, Review and Analyze Email from Client with Attachment; Receive, Review and Analyze Email from JW	.50
4/7/17	Receive, Review and Analyze Email from Client	.25
4/10/17	Email Chain JP, AD, JR; Re: PMK of Viking	.50
4/13/17	Draft and send email to AF re re-notice depo of Viking 30(b)(6)	.20
4/18/17	Draft and send email to AF re dropping off cc to Judge of Motion to compel Kreason	.15
4/18/17	Draft and Send Email to Client with Attachment	.75

4/18/17	T/C with Attorney Hulet and Draft and Send Email to Client	.50
4/18/17	Receive, Review and Analyze Email from Client	.25
4/18/17	Receive, Review and Analyze Email from Client	.40
4/18/17	Receive, Review and Analyze Email from Client	.40
4/18/17	Receive, Review and Analyze Email from Client	.25
4/18/17	Email Chain with AD, AF, Re: Kreason Deposition	.25
4/19/17	Call with Client	.50
4/19/17	Receive, Review and Analyze Email from Client	.65
4/19/17	Receive, Review and Analyze Email from Client with Attachments	.50
4/20/17	Email Chain with Client	.50
4/20/17	Receive, Review and Analyze Email from Client with Attachments	.50
4/20/17	Receive, Review and Analyze Email from M. Giberti	.15
4/20/17	Email Chain with AD, AF; Re: Testing of Heads	.25
4/21/17	Email Chain with AD, JP, AF; Re: Written Protocol	.50
4/23/17	Draft and send email to AF re research on the contract prior to the MSJ hearing	.15
4/24/17	Draft and send email to AF re printing 3 <sup>rd</sup> party complaint Lange filed against Viking	.15
4/24/17	Draft and Send Email to Client with Attachment	.25
4/24/17	Receive, Review and Analyze Email from Client	.15
4/24/17	Receive, Review and Analyze Email from Client	.15
4/24/17	Receive, Review and Analyze Email from Client with Attachments	.25
4/24/17	Draft and Send Email to Client	.15
4/25/17	Draft and Send Email to Bullock with Attachment and Draft and Send Email to Client	.50
4/25/17	Call with Client	.40

4/25/17	Draft and send email to AF re emailing 3 <sup>rd</sup> party complaint Lange filed against Viking	.15
4/25/17	Email Chain with Client and Office	.50
4/26/17	Email Chain with Client	.75
4/26/17	Email Chain with Client	.40
4/26/17	Receive, Review and Analyze Email from Client	.25
4/26/17	Receive, Review and Analyze Email from Client and Draft and Send Email to AF	.35
4/27/17	Draft and send email to AF re draft notice of depo and SDT for Dan Cadden	.15
4/27/17	Draft and send email to AF re what motions we need to file in Edgeworth and begin drafting	.20
4/27/17	Email chain with AF and JW re written discovery for Viking	.15
4/27/17	Draft and send email to AF re pulling invoices from Viking to Lange showing heads purchased	.15
4/27/17	Draft and send email to AF re forward from client	.40
4/28/17	Draft and Send Email to GZ; Re: Protocol with Attachments	.15
4/28/17	Email chain with AF re American Grating ECC and EFT Supp	.15
4/28/17	Review and analyze Viking's responses to written discovery	1.25
5/1/17	Draft and Send Email to Client with Attachment	.50
5/1/17	Email Chain with Client	.25
5/1/17	Draft and send email to AF re Viking's 2 <sup>nd</sup> Supp	.50
5/2/17	Email chain with AF requesting Viking 30(b)(6) notice, 3 <sup>rd</sup> party complaint and amended complaint emailed and printed	.20
5/2/17	Receive, Review and Analyze Email from Client	.15
5/2/17	Receive, Review and Analyze Email from Client	.15
5/2/17	Receive, Review and Analyze Email from Client	.25
5/2/17	Email Chain with KH with Attachment - Care & Handling	.25



5/2/17	Email Chain with KH with Attachments; Re: Testing Protocol	.50
5/2/17	Receive, Review and Analyze Email from Client	.50
5/2/17	Email Chain with AD, JP; Re: PMK Deposition	.25
5/2/17	T/C with Expert Hastings	.25
5/2/17	Call with Client	1.15
5/2/17	Call with Client	.15
5/3/17	Call with Client	.10
5/3/17	Call with Client	.15
5/3/17	Email chain with attachments to AF forwarded from Hastings and Viking supply invoices	.25
5/3/17	Draft and Send Email to Client	.15
5/3/17	Receive, Review and Analyze Email from Client with Attachment	.50
5/4/17	Call with Client	.75
5/4/17	Receive, Review and Analyze Email from M. Giberti with Attachments	.50
5/4/17	Receive, Review and Analyze Email from Client	.25
5/4/17	Receive, Review and Analyze Email from Client with Attachment	.25
5/4/17	Draft and Send Email to Kinsale	.40
5/4/17	Receive, Review and Analyze Email from Kinsale and Forward to Client	.15
5/4/17	Receive, Review and Analyze Email from Client with Attachment	.25
5/4/17	Receive, Review and Analyze Email from Client	.40
5/4/17	Email Chain with AD, AC, LF; Re: Giberti's 3 <sup>rd</sup> Party Complaint	.25
5/5/17	Email Chain with AD, AF; Re: Names of Employees	.25
5/5/17	Email chain with AF and Janelle re June 7 <sup>th</sup> hearing	.15
5/5/17	Receive, Review and Analyze Email from Client	.25
5/5/17	Receive, Review and Analyze Email from Client with Attachments	.40

5/5/17	Receive, Review and Analyze Email from Client with Attachments; Email to AF	.50
5/5/17	Receive, Review and Analyze Email from Kinsale	.40
5/5/17	Draft and Send Email to M. Giberti with Attachment	.40
5/5/17	Email Chain with JP, AD, AF	.25
5/5/17	Draft and send email to AF re Bullock re 3 <sup>rd</sup> party complaint	.20
5/5/17	Draft and send email to AF with attachments that were forwarded from client re gate entries	.25
5/8/17	Receive, Review and Analyze Email from Client	.25
5/8/17	Email Chain with Client	.50
5/8/17	Draft and Send Email to JO with Attachment; Re: Lost Basis Summary and Attachments	.25
5/8/17	Email Chain with AD, AF, JP; Re: Order Denying MSJ	.35
5/8/17	Email Chain with AD, JP, JW; Re: SAO to Continue Hearing on Plaintiff's Motion for Order to Show Cause	.15
5/8/17	Email Chain with Client	.75
5/9/17	Draft and send email to AF re reference to Edgeworth house	.15
5/10/17	Email Chain with JP, AF, AD, JR; Re: Site Inspection	.50
5/11/17	Email chain with AF re Mason depo scheduling	.15
5/11/17	Email chain with AF re weather expert	.15
5/11/17	T/C with Expert Hastings	.25
5/11/17	Receive, Review and Analyze Email from Client	.50
5/11/17	Receive, Review and Analyze Email from Client with Attachments; Receive, Review and Analyze Email from M. Giberti	1.25
5/11/17	Draft and Send Email to Client Re: Attorney Referral	.25
5/11/17	Draft and Send Email to Client	.50
5/11/17	Draft and Send Email to Client with Attachment	.20

5/11/17	Email Chain with GZ; Re: Testing Dates and Travel to Las Vegas	.50
5/12/17	Email Chain with JP, AD, AF; Re: Protective Order	.15
5/12/17	Receive, Review and Analyze Email from Client	.25
5/12/17	Draft and Send Email to Client	.15
5/12/17	Draft and Send Email to Client with Attachment	.25
5/12/17	Email Chain with Client	.20
5/12/17	Receive, Review and Analyze Email from M. Giberti with Attachment	.40
5/12/17	Receive, Review and Analyze Email from M. Giberti with Attachment	.40
5/12/17	Draft and Send Email to M. Giberti	.25
5/15/17	Email Chain JP; Re: PMK Conflict	.15
5/15/17	Email chain with AF re Opp to Lange's motion to compel sprinkler heads	.15
5/16/17	Receive, Review and Analyze Email from Client	.25
5/16/17	Draft and Send Email to Client	.15
5/16/17	Receive, Review and Analyze Email from M. Giberti	.50
5/17/17	Email Chain with JP, AD, AF, JR, TJ; Re: Expert Availability and Extensions for Briefing	.25
5/18/17	Email Chain with AD, JP, AF; Re: Site Inspection	.25
5/18/17	Draft and Send Email to Client with Attachments	.25
5/18/17	Email Chain with KH; Re: Testing in Las Vegas	.35
5/18/17	Email Chain with Client	.40
5/18/17	Email Chain with M. Giberti	.65
5/18/17	Draft and Send Email to Client with Attachments	.15
5/18/17	Draft and Send Email to Client with Attachments	.15
5/18/17	Receive, Review and Analyze Email from Client	.15

5/19/17	Email Chain with M. Giberti	.25
5/19/17	Email Chain with AD, JP; Re: Testing	.25
5/22/17	Email Chain with AD, AF, JP; Re: DCRR	.25
5/22/17	Draft and send email to AF re returning Amanda Kern call from City of Henderson	.15
5/22/17	Email chain with AF re changes to DCRR	.15
5/23/17	Email Chain with AF, AD, JP; Re: DCRR	.25
5/24/17	Draft and send email to AF re professors for weather expert	.15
5/24/17	Email Chain with AF, KH with Link; Re: Rimkus Documents	.15
5/23/17 - 5/24/17	Email Chain with Client	.25
5/25/17	Email Chain with Client	.40
5/25/17	Email Chain with AD, AF; Re: 2.34	.25
5/26/17	Email chain with AF re Sia's email to withdraw MSJ	.15
5/26/17	Draft and Send Email to Client with Attachments	.15
5/28/17	Email Chain with JP, AF, AD; Re: Extension for Discovery Responses	.25
5/30/17	Email Chain with AF, AD, JP; Re: Testing	.15
5/30/17	Email Chain with JP, AF, AD; Re: Stipulated Protective Order	.15
5/30/17	Email Chain with AF, JP, AD; Re: Inspection	.25
5/30/17	Draft and Send Email to Client with Link	.40
5/30/17	Email chain with AF re start time of 6/22/17 testing	.25
5/30/17	Email chain with AF re weather expert Mike Schwob	.15
5/30/17	Draft and send email to AF re preparation of expert designation	.15
5/30/17	Email chain with AF re Stipulated Protective Order	.25
5/31/17	Email chain with AF re draft of Reply to limited Opp to Motion to Compel Kreason	.15

5/31/17	Receive, Review and Analyze Email from M. Giberti	.25
5/31/17	Email Chain with JP, AF; Re: Deposition of Supply Net	.25
5/31/17	Receive, Review and Analyze Email from Client	.25
5/31/17	Email Chain with JP, AF, AD; Re: State Inflammation Deposition	.25
6/1/17	Email Chain with AD, AF, JP; Re: Plaintiff's Motion to Compel	.15
6/1/17	Email Chain with AD, AF, JP; Re: Inspection	.25
6/1/17	Email Chain with JP, AD, AF; Re: Stipulated Protective Order	.15
6/1/17	Email Chain with AF, JP; Re: Inspection of Warehouse	.15
6/1/17	Email Chain with AD, AF; Re: Attendance for Inspection	.15
6/1/17	Draft and send email to AF re book (Real Estate Damages) to be ordered	.15
6/1/17	Draft and Send Email to Client; Receive, Review and Analyze Email from AF; Receive, Review and Analyze Email from Client (7:15 am); Receive, Review and Analyze Email from Client (8:19 am); Receive, Review and Analyze Email from AF	.35
6/6/17	Receive, Review and Analyze Email from Client with Link	.50
6/2/17	Email Chain with JP, AD, M. Nunez; Re: Giberti Appearance	.15
6/2/17	Email Chain with JP, AD, AF, MN; Re: Prior Pleadings	.15
6/2/17	Call with AMF	.15
6/2/17	Email chain with AF re producing prior pleadings to Nunez	.15
6/5/17	Email Chain with AF, JP; Re: Supply Tech Warehouse Inspection	.15
6/5/17	Email Chain with AD, AF, JP; Re: Protective Order	.50
6/5/17	Email Chain with JP, AF, AD; Re: Warehouse Inspection	.15
6/5/17	Email Chain with JP, AF, AD, MN; Re: Protective Order	.25
6/5/17	Email Chain with JP, AD, AF, MN; Re: Johnson Deposition	.25
6/5/17	Email chain with AF re Reply to Compel Lange 30(b)(6)	.15
6/5/17	Email chain with AF and Pancoast re inspection email sent to Pancoast and follow up	.25

6/6/17	Draft and send email with link to AF re UPS petition and notice of 30(b)(6)	.40
6/6/17	Call with Client	.40
6/6/17	Call with Client	.10
6/6/17	Call with Client	.25
6/6/17	Email Chain with AD, AF, JP;; Re: Cadden Deposition, Johnson Deposition and COR Deposition	.50
6/6/17	Email Chain with JP, AD, MN; Re; Protective Order	.25
6/6/17	Draft and Send Email to Client	.25
6/6/17	Receive, Review and Analyze Email from Client	.15
6/6/17	Draft and Send Email to AF	.25
6/6/17	Receive, Review and Analyze Email from AF	.15
6/6/17	Receive, Review and Analyze Email from Client (7:25 pm); Receive, Review and Analyze Email from AF(9:25 pm)	.35
6/7/17	Draft and send email to AF re Johnson depo exhibits and response	.15
6/7/17	Email Chain with KH; Re: Expert Reports	.15
6/7/17	Email Chain with AD, AF; Re: Lange Employees	.15
6/7/17	Receive, Review and Analyze Email from Client with Attachment; Draft and Send Email to Client	.25
6/7/17	Draft and Send Email to Client	.25
6/7/17	Draft and Send Email to Client	.15
6/7/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/8/17	Email Chain with Client	.25
6/8/17	Call with Client	.15
6/8/17	Call with Client	.15
6/8/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/8/17	Receive, Review and Analyze Email from Client	.15

6/8/17	Receive, Review and Analyze Email from Client	.15
6/8/17	Email Chain with AF	.15
6/8/17	Receive, Review and Analyze Email from Client	.15
6/8/17	Receive, Review and Analyze Email from Client	.15
6/8/17	Email Chain with AD, JP, AF; Re: Testing Protocol	.45
6/8/17	Email chain with AF re COR Depo of City of Henderson	.15
6/9/17	Receive, Review and Analyze Email from Client with Attachment	.35
6/9/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/9/17	Email Chain with KH with Attachments; Re: Testing Protocol	.25
6/9/17	Email Chain with GZ: Re: Testing Protocol and Sprinkler Heads	.25
6/9/17	Email chain with AF re name of Viking SupplyNet worker	.15
6/10/17	Email Chain with GZ, AF; Re: Testing Protocol	.25
6/10/17	Email Chain with GV, KH and File Manager; re: Picking Up Heads in Long Beach	.50
6/10/17	Draft and Send Email to KH; Re: Picking Up Heads and Inspection	.15
6/12/17	Email Chain with AD, JW, AF, JP; Re: Deposition of Diorio	.75
6/12/17	Email Chain with JP, MN, AD, AF; Re: Protective Order	.15
6/12/17	Email Chain with Client	.50
6/12/17	Receive, Review and Analyze Email from Client; Receive, Review and Analyze Email from AF to Client	.15
6/12/17	Receive, Review and Analyze Email from Client	.15
6/12/17	Receive, Review and Analyze Email from Client	.15
6/12/17	Draft and Send Email to Client with Attachments	.15
6/12/17	Email Chain with JO; Re: Real Estate Damages	.50
6/12/17	Call with Client	.25
6/13/17	Call with Client	.40

6/13/17	Call with Client	.40
6/13/17	Draft and Send Email to JO with Attachments; Re: Nonphysical Defects	.15
6/13/17	Email chain with AF and Hastings re documents	.15
6/13/17	Draft and Send Email to Client with Attachments	.15
6/13/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/13/17	Email Chain with AF, KH with Link; Re: Depositions and Exhibits	.15
6/14/17	Email Chain JP, AF, AD; Re: Protocol	.50
6/14/17	Email Chain with KH; Re: Temperature Readers	.25
6/15/17	Email Chain with KH, AF with Attachments; Re: Testing Protocol	.25
6/15/17	Email Chain with AD, JP, AF; Re: Sixth Supp	.25
6/15/17	Email Chain with AD, JP; Re: DCRR 6/7/17	.15
6/15/17	Email Chain with JP, AD, MN, AF; Re: Protective Order	.15
6/15/17	Call with Client	.25
6/16/17	Call with Client	.15
6/16/17	Call with Client	.15
6/16/17	Email chain with AF re Zamiski's signature page for written protocol for testing	.15
6/16/17	Email Chain with NG, JP, AD, AF; Re: Giberti Extension	.50
6/16/17	Email Chain with JP, MN, AD; Re: Design Documents	.50
6/16/17	Draft and send email to AF re locating document for client	.15
6/16/17	Email Chain with GZ with Design Document	.15
6/16/17	Email chain with AF re Giberti's Stip and Order to Extend Discovery	.15
6/16/17	Email Chain with Client; Review UL Docs	1.50
6/16/17	Draft and Send Email to Client with Attachments	.15
6/16/17	Receive, Review and Analyze Email from Client with Attachment	.25



6/16/17	Email Chain with Client	.15
6/16/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/17/17	Receive, Review and Analyze Email from Client with Attachment	.25
6/19/17	Email Chain with Client	.15
6/19/17	Receive, Review and Analyze Email from JP; Forward to Client with Attachments	.50
6/19/17	Draft and Send Email to KH with Attachments; Re: Design Documents	.15
6/19/17	Receive, Review and Analyze Email from Client with Attachment	.35
6/19/17	Email Chain with JP, MN, AD, AF; Re: Design Documents	.50
6/19/17	Email chain with AF re demand for prior pleadings by Giberti	.15
6/19/17	Call with Client	.40
6/19/17	Call with Client	.25
6/19/17	Call with Client	.15
6/20/17	Call with Client	.15
6/20/17	Call with AMF	.15
6/20/17	Call with Client	.50
6/20/17	Email Chain with JP, AF, AD, MN; re: Kreason Deposition, Hearing, UPS Deposition and Diorio Deposition	.75
6/20/17	Email to Dalacas; Re: Supps	.15
6/20/17	Email chain with AF re phone call with Don Koch	.15
6/20/17	Receive, Review and Analyze Email from AF to Client with Attachment	.15
6/20/17	Receive, Review and Analyze Email from Client with Attachments	.35
6/22/17	Email Chain with AF, AP, TM; re: Supply Net Deposition	.75
6/20/17	Email chain with AF and Janelle re hearing date for Kreason motion to compel	.15
6/20/17	Email chain with AF re list of exhibits from depos with attachment	.15

6/21/17	Call with Client	.10
6/21/17	Call with Client	.25
6/22/17	Call with Client	.10
6/22/17	Call with AMF	.10
6/22/17	Call with Client	.15
6/22/17	Call with Client	.15
6/22/17	Call with AMF	.15
6/23/17	Email chain with AF re downloading and sending screenshots of nest energy history	.15
6/23/17	Receive, Review and Analyze Email from Client with Attachment; Forward to AF; Discussion with AF	.65
6/23/17	Call with AMF	.10
6/23/17	Call with AMF	.15
6/23/17	Receive, Review and Analyze Email from AF	.25
6/26/17	Email chain with AF re documents for Kreason depo (specifically Rimkus documents)	.20
6/27/17	Email Chain with GZ; Re: Viking Deposition and Confidentiality	.15
6/27/17	Receive, Review and Analyze Letter from Nunez re prior pleadings	.15
6/28/17	Email chain with AF re vacating Kreason Motion to compel	.20
6/28/17	Call with AMF	.15
6/28/17	Email chain with AF re Kyle Mao depo (AF thoughts, exhibits pulled)	1.0
6/30/17	Call with Client	.40
6/30/17	Text Message with AMF	.10
6/30/17	Text Message with AMF	.10
6/30/17	Email Chain with JP, AF; Re: VKG 0036-0039	.75
7/3/17	Email Chain with KH; Re: Expert Reports	.25

7/3/17	Receive, Review and Analyze Email from Client with Attachments	.25
7/4/17	Email Chain with JP, AD, AF, MN; Re: Carnahan Deposition	.15
7/5/17	Email Chain with GZ; Re: Expert Reports	.25
7/6/17	Email Chain with JP, AF, AD, MN; Re: Sixth Supp	.15
7/6/17	Email Chain with AD, AF; Re: Expert Testing Results	.15
7/6/17	Email chain with AF re Lange expert raw data from testing	.25
7/6/17	Email chain with AF re sending documents to Hastings	.15
7/6/17	Email chain with AF re moving Carnahan depo	.15
7/7/17	Call with AMF	.10
7/7/17	Call with AMF	.25
7/10/17	Email chain with AF re documents Zamiski requested	.15
7/10/17	Email chain with AF re documents Viking produced and what experts need what	.20
7/10/17	Received, reviewed and responded to email from AF with important Viking emails from recent production	.25
7/10/17	Email chain with AF re Johnson depo exhibits	.20
7/10/17	Email chain with AF with attachments re ACORE report and invoice	.25
7/10/17	Email chain with AF re Opposition	.15
7/10/17	Email chain with AF re Opp to Motion to extend discovery deadlines	.25
7/10/17	Email Chain with GZ; Re: Exhibits for Martorano Deposition	.15
7/10/17	Email Chain with GZ; Re: Report and Return of Sprinklers	.40
7/10/17	Email Chain with AF, GZ; Re: Shipment of Sprinklers and Chain of Custody	.25
7/10/17	Receive, Review and Analyze Email from Client and AF	.25
7/10/17	Review Appraisal and Forward to Client	.75
7/10/17	Receive, Review and Analyze Email From JO with Appraisal and Invoice	.25

7/10/17	Draft and Send Email to JO Requesting CV and Testimony History	.15
7/10/17	Email Chain with JP, AF, AD, MN, TU; Re: JCCR	.15
7/11/17	Email Chain with AF, AD, TU, JP; Re: 7/12/17 Hearing	.40
7/11/17	Email Chain with AD, JP, MN, TU; Re: Discovery Motions	.25
7/11/17	Email Chain with AD, AF; Re: Lange Motions	.50
7/11/17	Draft and send email with attachments to AF re Olivas CV	.15
7/11/17	Email Chain with JO; Re: CV and Testimony History	.25
7/11/17	TC with Hastings. Email Chain with AF, KH; Re: Nest History	.50
7/11/17	Email Chain with Client Re: Appraisal	.25
7/11/17	Receive, Review and Analyze Email from Hastings with Attachments; Forward to client; Email Chain with Client	.50
7/12/17	Email Chain with JP, TU, AD, AF; Re: Discovery Deadlines	.25
7/12/17	Email chain with AF re revised supplemental JCCR	.25
7/12/17	Email Chain with NG, JP, AD, AF; Re: SAO to Extend Discovery	.35
7/12/17	Email chain with AF and Zamiski re sprinklers being sent to Vollmer Grey	.50
7/13/17	Email Chain with JP, MN, TU, AD, AF; Re: Supp, JCCR	.25
7/13/17	Email Chain with MN, JP; Re: Mediation	.25
7/13/17	Email chain with AF re Rimkus subpoena for documents	.15
7/13/17	Receive, Review and Analyze Email from E. Johnson	.25
7/13/17	Draft and send email to AF re objection to confidentiality of Viking documents and response	.15
7/14/17	Draft and send email to AF re Zamiski preparing chain of custody documents and response	.15
7/14/17	Email chain with AF re 2 <sup>nd</sup> Supplement to Lange Motion for sanctions	.25
7/14/17	Draft and send email to AF re letter to Sia to be drafted re sanctions	.50

7/17/17	Email chain with AF re Giberti motion to extend discovery	.15
7/17/17	Draft and Send Email to Client	.15
7/17/17	Draft and send Letter to Dalacas re costs for second deposition of Lange 30(b)(6)	.50
7/18/17	Email chain with AF re notice of 2.34 with Viking re deficient discovery responses	.15
7/18/17	Receive, Review and Analyze Email from Client and Responses	.20
7/18/17	Draft and Send Email to Client with Attachments	.15
7/18/17	Receive, Review and Analyze Email from Client	.15
7/18/17	Receive, Review and Analyze Email from Client	.20
7/18/17	Draft and Send Email to Client with Attachments	.25
7/18/17	Draft and Send Email to Client	.15
7/18/17	Draft and Send Email to Client	.15
7/18/17	Draft and Send Email to AF	.15
7/18/17	Email Chain with Client	.15
7/18/17	Receive, Review and Analyze Email from Client	.15
7/18/17	Draft and Send Email to Client	.15
7/18/17	Receive, Review and Analyze Email from AF Re: Objections	.50
7/18/17	Draft and Send Email to Client	.25
7/18/17	Email Chain with G. Zamiski; Forward to client	.15
7/18/17	Receive, Review and Analyze Email from KH; Re: Report	.15
7/18/17	Email Chain with GZ; Re: Report	.25
7/18/17	Email chain with AF re objection to confidentiality and response	.25
7/18/17	Draft and send email to AF re printing all discovery responses	.15
7/18/17	Draft and send email and attachment to AF re Caranahan depo and SDT and response	.25

7/18/17	Receive, Review and Analyze Letter from Pancoast re Robert Carnahan deposition and SDT	.75
7/19/17	Email chain with AF re Lange's 8 <sup>th</sup> supplement and raw data from destructive testing	.20
7/19/17	Email chain with AF re Sia's changes to the DCRR re Lange's sanctions	.50
7/19/17	Draft and send email to AF re checking production to make sure we have produced proper documentation for all damages	.15
7/19/17	Email Chain with GZ with Report; Re: Review and Analyze Report	.50
7/19/17	Draft and Send Email to GZ with Raw Data	.15
7/19/17	Email Chain with AD, AF; Re: Testing	.15
7/19/17	Draft and Send Email to KH with Attachments; Re: Raw Data	.15
7/19/17	Draft and Send Email to KH; Re: Test Results	.25
7/19/17	Draft and Send Email to Client with Letter from JP	.15
7/19/17	Email Chain with Client	.25
7/19/17	Receive, Review and Analyze Email from Client	.25
7/19/17	Email Chain with Client	.25
7/19/17	Receive, Review and Analyze Email from Client and AF with Attachments	.20
7/19/17	Receive, Review and Analyze Email from AF to Client with Attachments	.25
7/19/17	Receive, Review and Analyze Email from Dalascas with Attachments; Forward to Client	.50
7/19/17	Email Chain from AF to Client with Attachments	.25
7/19/17	Receive, Review and Analyze Email from Client	.20
7/19/17	Receive, Review and Analyze Email from Client	.20
7/19/17	Email Chain with AD, AF, JP, MN; Re: Raw Data	.35
7/19/17	Call with Client	.90

7/20/17	Call with Client	.15
7/20/17	Email Chain with JP, AF; Re: DCRR 2.34	.75
7/20/17	Draft and Send Email to KH with Attachments; Re: Answers to Interrogatories	.15
7/20/17	Draft and Send Email to GZ with Answers to Interrogatories	.15
7/21/17	Draft and send email to AF with attachments re documents being sent to expert	.25
7/21/17	Receive, Review and Analyze Email from Client	.25
7/21/17	Email Chain with AD, JP, MN, AF; Re: DCRR 7/12/17	.25
7/22/17	Email Chain with JP, AF; Re: Carnahan Deposition and Viking Sales Rep	.40
7/23/17	Receive, Review and Analyze Email from Client	.25
7/23/17	Receive, Review and Analyze Email from Client	.50
7/23/17	Receive, Review and Analyze Email from Client	.50
7/23/17	Receive, Review and Analyze Email from Client with Attachments	.50
7/24/17	Draft and send email to AF re Kreason depo	.15
7/24/17	Draft and send email to AF re re-noticing Carnahan depo and response	.15
7/24/17	Email chain with AF re contacting Harold Rodgers	.15
7/24/17	Draft and send email to AF re drafting Rimkus subpoena for other sprinklers and response	.15
7/25/17	Email chain with AF re vacating status check on Lange sanctions	.25
7/25/17	Receive, Review and Analyze Email from Client with Link	.50
7/25/17	Receive, Review and Analyze Email from Client	.25
7/25/17	Receive, Review and Analyze Email from Client	.25
7/25/17	Receive, Review and Analyze Email from Client	.15
7/25/17	Receive, Review and Analyze Email from Client	.25

7/25/17	Receive, Review and Analyze Email from Client with Attachments	.25
7/25/17	Draft and Send Email to KH; Re: Request to Speak	.15
7/25/17	Draft and Send Email to KH with Attachments; Re: Letter and Second Supp Answers	.25
7/25/17	Email Chain with GZ; Re: Status of Report and Request for Phone Call	.15
7/25/17	Review and analyze Viking's supplemental responses to written discovery	1.25
7/25/17	Email Chain with AF, JP; Re: 6 <sup>th</sup> Supp	.25
7/26/17	Email Chain with JP, AF; Re: Request 30(b)(6)	.25
7/26/17	Receive, Review and Analyze Email from KH; Re: Scheduling and Email Chain with KH, WI and File Manager; Re: Meeting	.25
7/26/17	Email Chain with D. Holloman; Re: FH Dates	.50
7/26/17	Phon conference with expert Zamiski	.25
7/27/17	Receive, Review and Analyze Email from D. Koch	.25
7/28/17	Call with Client	.40
7/28/17	Draft and Send Email to Client with Attachments	.25
7/28/17	Receive, Review and Analyze Email from Ivey Engineering; Forward to Client; T/C with Expert	.75
7/28/17	Receive, Review and Analyze Email from Client	.15
7/28/17	Receive, Review and Analyze Email from Client	.15
7/28/17	Receive, Review and Analyze Email from Client	.15
7/28/17	Draft and Send Email to Client	.15
7/28/17	Receive, Review and Analyze Email from Hastings	.25
7/28/17	Draft and Send Email to Client	.15
7/28/17	Receive, Review and Analyze Email from Client	.15
7/28/17	Receive, Review and Analyze Email from Client	.20



7/28/17	Receive, Review and Analyze Email from with Attachment	.40
7/28/17	Email Chain with KH; Re: Temp Devices	.50
7/31/17	Receive, Review and Analyze Email from Client	.15
7/31/17	Receive, Review and Analyze Email from Client with Attachment	.15
7/31/17	Call with Client	.15
7/31/17	Call with Client	.15
7/31/17	Call with Client	.10
7/31/17	Call with Client	.15
7/31/17	Receive, Review and Analyze Email from Client with Attachment; Draft Outline	.75
8/1/17	Draft and Send Email to Client with Attachment	.25
8/1/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/2/17	Email Chain with JP, AF; Re: Missing Documents Mixed Up	.15
8/2/17	Email Chain with TU, JP, AD, AF, MN; Re: Order to Extend Discovery	.35
8/2/17	Email Chain with JP, AF; Re: Service of Documents	.25
8/3/17	Call with Client	.20
8/3/17	Call with Client	.15
8/3/17	Email Chain with Client with Attachment	.50
8/3/17	Receive, Review and Analyze Email From GZ; Re: Report and Meeting	.15
8/3/17	Receive, Review and Analyze Email from Client with Attachment	.50
8/3/17	Receive, Review and Analyze Email from Client with Attachment	.50
8/4/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/4/17	Call with Client	.10
8/4/17	Call with Client	.15
8/4/17	Call with Client	.25

8/4/17	Call with Client	.25
8/4/17	Receive, Review and Analyze Email from Client with Attachment	.40
8/4/17	Email Chain with AD; Re: Costs with Attachments	.35
8/4/17	T/C with expert Zamiski	.25
8/6/17	Call with Client	1.0
8/7/17	Call with Client	.10
8/7/17	Email chain with AF re Colin Kendrick and Margaret Ho	.15
8/7/17	Receive, Review and Analyze Email from Client	.25
8/7/17	Receive, Review and Analyze Email from Client with Attachment	.50
8/7/17	Receive, Review and Analyze Email from Client with Attachment	.50
8/7/17	Email Chain with GZ; Re: Report and Review of Reports	.50
8/7/17	Receive, Review and Analyze Email From JP; Re: Email Documents	.15
8/7/17	Email Chain with JP, AD, AF; Re: Martorano Deposition	.25
8/7/17	Draft and send email to AF re call from Fred Knez	.15
8/7/17	Draft and send email to AF re drafting motion to amend to add Viking Corp and response	.15
8/8/17	Email chain with AF re Viking's position of Martorano depo confidential	.15
8/8/17	Email chain with AF re documents still needed from Zamiski for expert disclosure	.15
8/8/17	Draft and send email to AF re requesting hearing transcripts from Court and response	.15
8/8/17	Draft and send email to AF re Viking's missing UL documents from their ECC production	.50
8/8/17	Email Chain with AF, TU, JP, AD, MN; Re: Order to Extend Discovery	.15
8/8/17	Email Chain with JP, AF; Re: Missing Documents	.25
8/8/17	Email Chain with AF, GZ with Attachments	.15

8/8/17	Receive, Review and Analyze Email From GZ with Report and Review of Report	.40
8/8/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/8/17	Draft and Send Email to Client with Attachment; Review Report	.75
8/8/17	Email Chain with Client with Attachment	.25
8/8/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/8/17	Receive, Review and Analyze Email from Client	.25
8/8/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/8/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/8/17	Email Chain with KH; Re: Meetings	.15
8/8/17	Call with AMF	.25
8/8/17	Call with AMF	.15
8/9/17	Draft and send email with attachment to AF re supplement fireplace pic	.15
8/10/17	Email Chain with AF	.25
8/10/17	Receive, Review and Analyze Email from Client	.25
8/10/17	Receive, Review and Analyze Email from Client	.25
8/10/17	Draft and Send Email to Client	.15
8/10/17	Receive, Review and Analyze Email from Client; Discussion with AF	.50
8/10/17	Receive, Review and Analyze Email from AF	.15
8/10/17	Receive, Review and Analyze Email from Client to AF; Receive, Review and Analyze Email from AF; Draft and Send Email to AF with Attachments; Discussion with AF	.40
8/10/17	Receive, Review and Analyze Email from Client	.25
8/10/17	Email Chain with Af with Attachments; Discussion with AF	.25
8/10/17	Receive, Review and Analyze Email from Client	.25

8/10/17	Receive, Review and Analyze Email from Client	.25
8/10/17	Draft and Send Email to Client	.15
8/10/17	Receive, Review and Analyze Email from Client	.15
8/10/17	Receive, Review and Analyze Email from Client	.15
8/10/17	Email Chain with KH, AF; Re: Oversized Plans, UL 1626	.15
8/10/17	Email Chain with D. Holloman; Re: Mediation Dates	.25
8/10/17	Email chain with AF re Plaintiff's ECC Supp	.15
8/10/17	Email chain with AF re sending documents to Hastings	.15
8/10/17	Email chain with AF re UL documents being sent to experts	.15
8/10/17	Draft and send email to AF re printing specific document	.15
8/10/17	Email chain with AF re Rimkus objection and drafting motion to compel	.25
8/11/17	Email chain with AF re prepare motion to amend to add Viking group and discussion with AF	.50
8/12/17	Receive, Review and Analyze Email from Client	.25
8/12/17	Call with Client	.25
8/12/17	Call with AMF	.15
8/12/17	Call with Client	.15
8/12/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/13/17	Receive, Review and Analyze Email from Client	.75
8/14/17	Call with Client	.15
8/14/17	Call with Client	.50
8/15/17	Email Chain with AD; Re: Expert Reports	.50
8/15/17	Receive, Review and Analyze Email from Client with Attachments	.50
8/15/17	Receive, Review and Analyze Email from AF	.15
8/15/17	Receive, Review and Analyze Email from Client	.20
8/15/17	Receive, Review and Analyze Email from A. Dalascas; Forward to Client	.15

8/15/17	Receive, Review and Analyze Email from Client	.15
8/15/17	Receive, Review and Analyze Email from Client;	.25
8/16/17	Receive, Review and Analyze Email from Client	.25
8/16/17	Email Chain with Af	.15
8/16/17	Receive, Review and Analyze Email from Client	.25
8/16/17	Draft and Send Email to Client with Attachments	.15
8/16/17	Receive, Review and Analyze Email from AF with Attachment to Client	.25
8/16/17	Receive, Review and Analyze Email from AF	.15
8/16/17	Email Chain with Client	.25
8/16/17	Draft and Send Email to Client	.15
8/16/17	Draft and Send Email to Client	.15
8/16/17	Receive, Review and Analyze Email from Client	.15
8/16/17	Draft and Send Email to Client	.15
8/16/17	Draft and Send Email to F. Knez	.25
8/16/17	Draft and Send Email to Client	.15
8/16/17	Receive, Review and Analyze Email from Client	.65
8/16/17	Receive, Review and Analyze Email from AF to Client	.15
8/16/17	Receive, Review and Analyze Email from Client with Link	.40
8/16/17	Email Chain with KH, AF with Hourly Weather Data; Re: Henderson Temps	.25
8/16/17	Email Chain with JP, JW, AF; Re: Depositions	.25
8/16/17	Email Chain with JP, JW, AF, AD, AU; Re: Inspections, Depositions	.25
8/16/17	Draft and send email to AF re Don Koch availability and review AF response	.15
8/16/17	Email chain with AF re expert reports	.25
8/16/17	Draft and send email and attachments to AF re Lange expert reports	.25

8/16/17	Email chain with AF re Viking's 12 <sup>th</sup> ECC Supplement and uploading docs to Dropbox	.15
8/16/17	Email chain with AF re deposition scheduling of Michigan Viking employees	.25
8/16/17	Received, reviewed and responded to email from AF re summary of Viking document dumps	1.75
8/17/17	Call with Client	.35
8/17/17	Email chain with AF re motion to compel	.15
8/17/17	Email chain with AF re reports being sent to Zamiski	.15
8/17/17	Email chain with AF re sending Mark Giberti City of Henderson documents	.15
8/17/17	Email Chain JP, AF, TH; Re: Motion to Compel	.25
8/17/17	Email Chain with JP, AF; Re: Data Dump	1.25
8/17/17	Email Chain with JP, AF, TH; Re: Motion to Compel	.15
8/17/17	Email Chain with JP, AF, AD, TU; Re: EDCR 2.34	.25
8/17/17	Email Chain with KH, AF; Re: Expert Reports	.15
8/17/17	Email Chain with JO with a Link; Re: Expert Report	.15
8/17/17	Draft and Send Email to GZ; Re: Meeting and Expert Reports	.50
8/17/17	Receive, Review and Analyze Email from Client	.50
8/17/17	Receive, Review and Analyze Email from Client	.15
8/17/17	Draft and Send Email to Client	.15
8/17/17	Draft and Send Email to Pancoast; Forward to Client	.15
8/17/17	Email Chain with Client	.25
8/17/17	Receive, Review and Analyze Email from Client	.25
8/17/17	Receive, Review and Analyze Email from Client; Discussion with AF	.25
8/17/17	Receive, Review and Analyze Email from AF	.25
8/18/17	Call with Client	.50

8/18/17	Draft and Send Email to Client	.15
8/18/17	Receive, Review and Analyze Email from Client	.75
8/18/17	Receive, Review and Analyze Email from Client	.25
8/18/17	Receive, Review and Analyze Email from Client	.25
8/18/17	Receive, Review and Analyze Email from Client	.25
8/18/17	Email Chain with JP, AF; Re: Motion to Compel	.40
8/18/17	Email Chain with JP, AF; Re: Verifications	.50
8/19/17	Receive, Review and Analyze Email from Client with Attachment	.75
8/19/17	Receive, Review and Analyze Email from Client	.25
8/19/17	Receive, Review and Analyze Email from Client	.25
8/19/17	Receive, Review and Analyze Email from Client	.25
8/20/17	Receive, Review and Analyze Email from Client	.25
8/20/17	Receive, Review and Analyze Email from AF/Client	.25
8/20/17	Receive, Review and Analyze Email from Client	.75
8/20/17	Receive, Review and Analyze Email from Client	.50
8/20/17	Draft and Send Email to Client	.15
8/20/17	Receive, Review and Analyze Email from Client	.25
8/20/17	Receive, Review and Analyze Email from Client with Attachment	.25
8/20/17	Receive, Review and Analyze Email from Client	.25
8/20/17	Receive, Review and Analyze Email from Client	.15
8/20/17	Draft and Send Email to Client	.15
8/20/17	Receive, Review and Analyze Email from Client	.75
8/20/17	Draft and send email to AF re printing email of missing Viking documents and response	.25
8/20/17	Call with Client	.35
8/20/17	Call with AMF	.10

8/20/17	Call with Client	.50
8/20/17	Call with Client	.75
8/21/17	Email chain with AF re Motion to Compel Rimkus	.15
8/21/17	Draft and send email to AF re preparing commission to take out of state depo of Harold Rodgers and review AF response	.25
8/21/17	Text Message with Client	.10
8/21/17	Email chain with AF re new requests for production	.15
8/21/17	Email chain with AF re notice and SDT to 30(b)(6) or Reliable and 30(b)(6) of Tyco	.25
8/22/17	Call with Client	.10
8/22/17	Call with Client	.40
8/22/17	Draft and send email to AF re Viking emails	.15
8/22/17	Receive, Review and Analyze Email from Client	.25
8/22/17	Receive, Review and Analyze Email from Client	.25
8/22/17	Draft and Send Email to Client	.15
8/22/17	Receive, Review and Analyze Email from Pancoast; Forward to Client	.15
8/22/17	Receive, Review and Analyze Email from Client	.25
8/22/17	Email Chain with GZ; Re: Exemplar Heads	.15
8/23/17	Email Chain with GZ; Re: Rebuttal Reports	.15
8/23/17	Email chain with AF re interior temps of Edgeworth house and what experts to send to	.15
8/23/17	Receive, Review and Analyze Email from Client with Attachments	.25
8/23/17	Email Chain with KH; Re: Binder - Lever Not Square	.15
8/23/17	Email Chain with CP	.25
8/23/17	Receive, Review and Analyze Email from Client	.25



8/24/17	Call with Client	.15
8/24/17	Call with Client	.15
8/24/17	Call with Client	.10
8/24/17	Draft and Send Email to GZ; Re: Req Exemplar Heads	.15
8/25/17	Draft and Send Email to Client with Attachment	.15
8/25/17	Receive, Review and Analyze Email from Client	.25
8/27/17	Email Chain with Client	.25
8/27/17	Receive, Review and Analyze Email from Client with Attachments	.25
8/27/17	Draft and Send Email to Client	.15
8/27/17	Draft and Send Email to GZ; Re: Lever Not Square	.15
8/27/17	Draft and send email to AF re printing several copies of bent lever bars	.15
8/28/17	Email Chain with Client	.25
8/29/17	Receive, Review and Analyze Email from Client	.25
8/29/17	Receive, Review and Analyze Email from Client	.15
8/29/17	Receive, Review and Analyze Email from Client	.15
8/29/17	Receive, Review and Analyze Email from Client/AF	.25
8/29/17	Draft and Send Email to Client	.15
8/29/17	Draft and Send Email to Client	.15
8/29/17	Draft and Send Email to Client with Attachments	.15
8/29/17	Draft and Send Email to Client	.15
8/29/17	Receive, Review and Analyze Email from Client	.15
8/29/17	Receive, Review and Analyze Email from Client	.25
8/29/17	Receive, Review and Analyze Email from Client with Link	.50
8/29/17	Email Chain with JP, AF, AD, MN; Re: Heat Invitation	.50
8/29/17	Email Chain with JP, AF; Re: Answers to Second Set of Interrogatories	.50

8/29/17	T/C with expert Hastings	.25
8/29/17	Draft and send email to AF re delivery of Koch binder and review AF response	.15
8/29/17	Draft and send email to AF re Jay McConnell phone call	.15
8/30/17	Receive, Review and Analyze Email from Client	1.25
8/30/17	Email chain with AF re Viking's responses to Lange	.50
8/30/17	Receive, Review and Analyze Email from Client	.40
8/30/17 - 9/1/17	Email Chain with KH, AF with Attachments on Non-Conforming Holds and Drop Box Link	.30
8/31/17	Email Chain with JP, AF, AD, JR, KR, SK; Re: DCRR 8/23/17	.35
9/1/17	Email to CP with Attachments Re: Heat Sources	.35
9/1/17	Review and analyze Viking's responses to written discovery	1.25
9/1/17	Email Chain with GZ; Re: Phone Call and Report	.15
9/1/17	Email Chain with AF, GZ with Attachments and Links; Re: UL Document	.25
9/1/17	Email Chain with JP, MN, AD, TU, AM, KR, SK; Re: Mediation	.25
9/1/17	Email Chain with JP AF, AD, SK, TU; Re: Depositions of Colin Kendrick	.25
9/1/17	Receive, Review and Analyze Email From D. Holloman	.50
9/1/17	Email Chain with JP, AF, AD, TU, KR, SK; Re: New Inspection	.40
9/1/17	Email Chain with AF, JP; Re: Carnahan Deposition	.15
9/1/17	Receive, Review and Analyze Email from Client	.50
9/1/17	Receive, Review and Analyze Email from Client	.35
9/1/17	Draft and Send Email to Client	.15
9/1/17	Draft and Send Email to Client	.15
9/1/17	Call with AMF	.10
9/1/17	Call with AMF	.15

9/1/17	Call with AMF	.25
9/1/17	Call with Client	.75
9/1/17	Call with Client	.25
9/1/17	Receive, Review and Analyze Email from Client	.15
9/2/17	Draft and send email and attachments to AF re UL's public definition of 1626 and review AF response	.50
9/2/17	Receive, Review and Analyze Email from Client with Attachment	.65
9/2/17	Draft and Send Email to AF/Client	.50
9/2/17	Receive, Review and Analyze Email from Client	.25
9/2/17	Receive, Review and Analyze Email from Client	.15
9/2/17	Receive, Review and Analyze Email from Client with Attachment	.75
9/2/17	Call with Client	.50
9/2/17	Call with Client	.15
9/2/17	Call with Client	.65
9/3/17	Call with Client	.40
9/3/17	Call with Client	.10
9/3/17	Call with Client	.25
9/3/17	Call with Client	.15
9/3/17	Call with Client	.25
9/3/17	Draft and Send Email to Client with Attachment	.25
9/3/17	Receive, Review and Analyze Email from Client; Revise Notice	.50
9/3/17	Receive, Review and Analyze Email from Client	.50
9/3/17	Draft and Send Email to Client	.25
9/3/17	Receive, Review and Analyze Email from Client	.15
9/4/17	Receive, Review and Analyze Email from Client	.15
9/4/17	Receive, Review and Analyze Email from Client with Attachment	.50

9/4/17	Receive, Review and Analyze Email from Client with Attachment	.75
9/4/17	Receive, Review and Analyze Email from Client	.50
9/5/17	Receive, Review and Analyze Email from Client	.50
9/5/17	Draft and Send Email to AF/Client	.50
9/5/17	Receive, Review and Analyze Email from Client	.25
9/5/17	Receive, Review and Analyze Email from Client	.25
9/5/17	Email Chain with Client	.15
9/5/17	Draft and Send Email to Client with Attachment	.25
9/5/17	Receive, Review and Analyze Email from Client with Attachments	.75
9/5/17	Email Chain with KH; Re: Deposition Dates	.15
9/5/17	Email Chain with D. Holloman; Re: Mediation Payment and Meeting with Floyd	.50
9/5/17	Email Chain with JO; Re: Deposition Dates	.15
9/5/17	Draft and Send Email to GZ; Re: Deposition Dates and Carnahan and Viking Depositions	.50
9/5/17	Draft and send email to AF re re-serving depo notice for ZAIC and review AF response	.25
9/5/17	Email chain with AF re re-scheduling depo of Harold Rodgers and PMK of EFT and AG	.20
9/5/17	Email chain with AF re discussing various issues re Edgeworth	.50
9/5/17	Email Chain with MN, JP, AD; Re: Mediation	.40
9/5/17	Email Chain with JP, AM, Re: Edgeworth Depositions	.25
9/5/17	Email Chain with JP, AF, TU, AD, KR, SK; Re: DCRR 8/23/17	.25
9/5/17	Email Chain with MN, JP, AD; Re: Carnahan Deposition	.15
9/5/17	Call with AMF	.15
9/8/17	Email Chain with AD, JP, MN, AF; Re: Inspection	.25
9/8/17	Email chain with AF re 8/23/17 DCRR and Viking's proposed changes	.25

9/8/17	Receive, Review and Analyze Email from Client	.15
9/8/17	Receive, Review and Analyze Email from Client	.50
9/8/17	Receive, Review and Analyze Email from Client	.25
9/8/17	Draft and Send Email to Client	.25
9/8/17	Draft and Send Email to Client	.15
9/8/17	Receive, Review and Analyze Email from Client	.50
9/8/17	Receive, Review and Analyze Email from Client	.25
9/8/17	Receive, Review and Analyze Email from Client	.50
9/8/17	Draft and send email to AF re motions that need to be drafted	.75
9/8/17	Email chain with AF re inspection of Mark Giberti job file by his lawyer	.15
9/8/17	Email chain with AF re subpoena and responses to ZAIC attorney	.75
9/9/17	Receive, Review and Analyze Email from Client	.25
9/9/17	Receive, Review and Analyze Email from Client	.25
9/9/17	Draft and Send Email to Client	.25
9/9/17	Receive, Review and Analyze Email from Client	.25
9/10/17	Receive, Review and Analyze Email from Client	.25
9/10/17	Receive, Review and Analyze Email from Client	.25
9/10/17	Receive, Review and Analyze Email from Client with Attachment	1.25
9/10/17	Call with Client	.10
9/10/17	Call with Client	.25
9/10/17	Draft and Send Email to Client	.15
9/10/17	Email Chain with GZ; Re: Conversion Chart	.25
9/11/17	Email Chain with AF, GZ; Re: Load On Link Attachments and Martorano Deposition	.15
9/11/17	Receive, Review and Analyze Email From AD; Re: Mr. Fehr	.15

9/11/17	Email chain with AF re 8/23/17 DCRR	.25
9/11/17	Email chain with AF re Edgeworth case schedule	1.0
9/11/17	Receive, Review and Analyze Email from Client	.50
9/11/17	Receive, Review and Analyze Email from Client	.15
9/11/17	Receive, Review and Analyze Email from Client	.25
9/11/17	Draft and Send Email to Client	.15
9/11/17	Receive, Review and Analyze Email from Client	.15
9/11/17	Draft and Send Email to Client	.15
9/11/17	Draft and Send Email to Client	.15
9/11/17	Receive, Review and Analyze Email from Client	.15
9/11/17	Draft and Send Email to Client	.15
9/11/17	Receive, Review and Analyze Email from Client	.25
9/11/17	Email Chain with KH, AF with Attachments; Re: Martorano Deposition	.15
9/11/17	Draft and Send Email to KH; Re: Deposition Data	.35
9/11/17	Email Chain with CP	.25
9/11/17	Email Chain with JP, AF, TU, AD, KR, SK; Re: DCRR 8/23/17 Changes	.40
9/11/17	Email Chain with JP, AF; Re: Martorano Information	.40
9/11/17	Receive, Review and Analyze Letter from Ward Law re Rimkus Subpoena and deposition	.25
9/12/17	Email Chain with JP, AD, MN, AF, JW; Re: Edgeworth Deposition	.75
9/12/17	Email chain with AF re motion to compel re heat powerpoint documents	.15
9/12/17	Receive, Review and Analyze Email from Client	.15
9/12/17	Receive, Review and Analyze Email from Client	.15
9/12/17	Receive, Review and Analyze Email from Client	.15

9/12/17	Draft and Send Email to Client	.25
9/12/17	Receive, Review and Analyze Email from Client	.15
9/12/17	Draft and Send Email to Client	.15
9/12/17	Receive, Review and Analyze Email from Client	.15
9/12/17	Draft and Send Email to Client	.25
9/12/17	Call with Client	.15
9/12/17	Call with Client	.15
9/12/17	Call with AMF	.15
9/12/17	Call with Client	.15
9/13/17	Email to CP with Exhibits	.25
9/13/17	Email Chain with CP Re: Scheduling PC	.25
9/13/17	Email Chain with D. Holloman; Re: FH Meeting	.15
9/13/17	Receive, Review and Analyze Email From GZ; Re: UL Drawings	.15
9/13/17	Receive, Review and Analyze Email From D. Holloman; Re: Mediation	.15
9/13/17	Email Chain with JP, AF, KR, SK; Re: UL Documents	.25
9/13/17	Email Chain with KR, SK, JP, AF; Re: Expert Depositions	.25
9/13/17	Receive, Review and Analyze Email From AD; Re: Fees Costs	.15
9/13/17	Email chain with AF re documents being sent to Zamiski	.15
9/13/17	Draft and send email and attachments to AF re documents to include in next ECC Supp and review AF response	.15
9/13/17	Draft and send email to AF re documents he needs for hearing and review AF response	.15
9/13/17	Draft and send email to AF re Michigan Viking employees amended depositions	.15
9/14/17	Email chain with AF re Ure coming to inspect Giberti file	.15
9/14/17	Email Chain with KR, AF, JP; Re: Deposition for Simmons	.50

9/14/17	Draft and send email and attachments to AF re PMK depo pages from client for motion to strike	.25
9/14/17	Email Chain with GZ; re: Completion of Rebuttal Report and Request for Information	.35
9/14/17	Draft and send email to AF re new dates to send to Robinson re expert depositions	.15
9/14/17	Email Chain with AF/CP with Attachments Re: Martorano Depo	.15
9/14/17	Draft and Send Email to Client	.25
9/14/17	Receive, Review and Analyze Email from Client	.25
9/14/17	Receive, Review and Analyze Email from Client with Attachments	.50
9/14/17	Receive, Review and Analyze Email from Client	.15
9/14/17	Receive, Review and Analyze Email from Client	.50
9/14/17	Receive, Review and Analyze Email from Client	.50
9/14/17	Receive, Review and Analyze Email from Client	.25
9/14/17	Receive, Review and Analyze Email from Client	.50
9/14/17	Receive, Review and Analyze Email from Client	.75
9/14/17	Draft and Send Email to Client	.25
9/14/17	Draft and Send Email to KH; Re: Request for Report	.15
9/14/17	Call with Client	.40
9/14/17	Call with Client	.50
9/18/17	Email chain with AF re documents being sent to Hastings	.15
9/18/17	Draft and send email to AF re stuff to add to Carnahan motion to compel	.20
9/18/17	Draft and Send Email to Client with Attachment	.15
9/18/17	Receive, Review and Analyze Email from Client	.35
9/18/17	Email from CP Re: opinion letter	.50
9/18/17	Receive, Review and Analyze Email From C. Kendrick	.15



9/18/17	Email Chain with JP, AF, AD, TU; Re: C. Kendrick	.25
9/18/17	Email Chain with JP, AF, KR, SK; Re: Meet and Confer for Written Discovery	.15
9/18/17	Draft and Send Email to KH with Attachments; Re: Torn Link	.15
9/18/17	Email Chain with KH, GV; Re: Carnahan Test Data	.15
9/18/17	Receive, Review and Analyze Email From KH with Rebuttal Report Attached	.25
9/18/17	Call with Client	.15
9/18/17	Call with Client	.15
9/19/17	Call with Client	.15
9/19/17	Call with Client	.15
9/19/17	Call with Client	.50
9/19/17	Call with Client	.50
9/19/17	Receive, Review and Analyze Email from Client	.25
9/19/17	Email Chain with KH; Re: Amic Attempts and Old Threads	.25
9/19/17	Email Chain with KR, AF, JP, EC; Re: 2.34	.15
9/19/17	Email Chain with AF, JP; Re: Deposition Rosa	.25
9/20/17	Draft and send email to AF re Pomerantz report be sent to Hasting	.15
9/20/17	Draft and send email to AF re lawyers in Riverside to represent us for Harold Rodgers depo and review AF response/ Discussion with AF	.15
9/20/17	Email Chain with KH, AF; Re: CP Report	.15
9/20/17	Email Chain with KH, AF with Attachments - Carnahan Data Graph	.25
9/20/17	Email Chain with KR, AF, JP; Re: Viking Employee Depositions	.50
9/20/17	Attend Hearing: Rimkus Motion to Compel; Telephone Conference with Max; Revise MSJ	5.25
9/20/17	Draft and Send Email to Client with Attachment	.15
9/20/17	Receive, Review and Analyze Email from Client	.15

9/20/17	Receive, Review and Analyze Email from Client	.15
9/20/17	Receive, Review and Analyze Email from Client with Attachment	1.25
9/20/17	Receive, Review and Analyze Email from Client	1.0
9/20/17	Call with Client	.50
9/21/17	Call with Client	.40
9/21/17	Call with AMF	.25
9/21/17	Receive, Review and Analyze Email from Client	.25
9/21/17	Receive, Review and Analyze Email from Client	.25
9/21/17	Receive, Review and Analyze Email from Client	.15
9/21/17	Receive, Review and Analyze Email from K. Rader	.15
9/21/17	Receive, Review and Analyze Email from Client	.15
9/21/17	Email chain with AF re drafting MSJ against Lange only	.15
9/21/17	Draft and Send Email to KH with Attachments; Re: Motley	.15
9/21/17	Email chain with AF re email from Kreason about cabinets and fireplace	.25
9/21/17	Email chain with AF re call with Hastings re Pomerantz report	.15
9/21/17	Meet with Client; Attend M. Giberti Deposition	7.0
9/21/17	Email Chain with JO; Re: Rigdon Report	.15
9/22/17	Email to CP with Attachments	.50
9/22/17	Receive, Review and Analyze Email From D. Holloman; Re: Mediation	.15
9/22/17	Call with Client	.25
9/22/17	Call with Client	.25
9/22/17	Email Chain with AF, JP, W. Laborde; Re: Rosa Emails	.15
9/22/17	Email chain with AF re additional points for motion to strike	.50
9/22/17	Review Lange's 10 <sup>th</sup> ECC Supplement	.25
9/22/17	Review Plaintiffs' 10 <sup>th</sup> ECC Supplement	.50

9/22/17	Discussion with AF; Email to Pomerantz	1.25
9/22/17	Review Viking's 13 <sup>th</sup> ECC Supplement	.50
9/22/17	Receive, Review and Analyze Email from Client	.50
9/22/17	Draft and Send Email to Client	.25
9/22/17	Draft and Send Email to Client	.25
9/22/17	Receive, Review and Analyze Email from Client	.15
9/22/17	Draft and Send Email to AF	.15
9/22/17	Draft and Send Email to AF	.15
9/22/17	Receive, Review and Analyze Email from Client with Attachment	.25
9/22/17	Email chain with AF and client re actual fireplace repair costs	.15
9/23/17	Receive, Review and Analyze Email from Client	.75
9/23/17	Receive, Review and Analyze Email from Client	.75
9/22/17	Review and analyze Viking's responses to written discovery	.75
9/24/17	Receive, Review and Analyze Email from Client	.50
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.25
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from K. Rader	.15
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.35
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Draft and Send Email to Client	.25
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.15

9/25/17	Draft and Send Email to Client	.15
9/25/17	Receive, Review and Analyze Email from Client	.15
9/25/17	Review Giberti's 4 <sup>th</sup> ECC Supplement	.75
9/25/17	Revise Motion to Strike Viking Answer	3.5
9/25/17	Review Viking's 14 <sup>th</sup> ECC Supplement	1.25
9/25/17	Call with Client	.15
9/25/17	Call with Client	.15
9/25/17	Call with Client	.15
9/26/17	Call with Client	.15
9/26/17	Call with AMF	.10
9/26/17	Call with Client	.15
9/26/17	Call with AMF	.10
9/26/17	Call with Client	.25
9/26/17	Call with AMF	.10
9/26/17	Call with Client	.35
9/26/17	Call with Client	.15
9/26/17	Call with Client	.15
9/26/17	Prepare and Take Raul De La Rosa Deposition	3.25
9/26/17	Receive, Review and Analyze Email From JO with Attachments; Re: Deposition Documents	.50
9/26/17	Email Chain with AF, KR, JP; Re: Reactivations	.15
9/26/17	Receive, Review and Analyze Email from K. Rader	.25
9/26/17	Receive, Review and Analyze Email from K. Rader	.15
9/26/17	Draft and Send Email to Client	.15
9/26/17	Draft and Send Email to Client	.15
9/26/17	Draft and Send Email to Client	.15
9/26/17	Receive, Review and Analyze Email from Client	.15

9/27/17	Receive, Review and Analyze Email from Client	.65
9/27/17	Draft and Send Email to Client	.15
9/27/17	Draft and Send Email to Client	.15
9/27/17	Receive, Review and Analyze Email from Client	.25
9/27/17	Receive, Review and Analyze Email from Client with Attachment	.35
9/27/17	Receive, Review and Analyze Email from Client	.25
9/27/17	Draft and send email to AF re printing email from Robinson for motion and review AF response	.15
9/27/17	Email Chain with JP, AF, W. Laborde; Re: Rosa Emails	.25
9/27/17	Revise Motion to Strike; Review Emails; Meet with Client: Pre-Depo	3.5
9/27/17	Call with Client	.15
9/27/17	Call with Client	.35
9/27/17	Call with Client	.15
9/28/17	Call with Client	.15
9/28/17	Call with Client	.25
9/28/17	Call with Client	.10
9/28/17	Call with Client	.25
9/28/17	Revise Motion to Strike Viking Answer	3.75
9/28/17	Revise Motion to De-Designate Confidentiality	1.5
9/28/17	Attend Collin Kendrick Deposition	1.5
9/28/17	Review Plaintiffs' 11 <sup>th</sup> ECC Supplement	.50
9/28/17	Receive, Review and Analyze Email from Client	.15
9/28/17	Receive, Review and Analyze Email from Client	.20
9/28/17	Draft and Send Email to Client	.50
9/28/17	Receive, Review and Analyze Email from Client	.25
9/28/17	Receive, Review and Analyze Email from Client	.25

9/28/17	Draft and send email to AF re points for our reply to the motion to strike and review AF response	.20
9/28/17	Email chain with AF re filing motion to strike and affidavit	.25
9/28/17	Draft and send email and attachment to AF re technical data sheet	.15
9/29/17	Attend Brian Edgeworth Deposition	7.5
9/29/17	Email Chain with NG, AD, JP, AF, MN; Re: Lawrence Deposition	.15
9/29/17	Receive, Review and Analyze Email From D. Holloman; Re: Mediation	.15
9/29/17	Email Chain with AF, AD, JP, MN, TU; Re: DCRR 9/13/17	.15
9/29/17	Email Chain with AF, MN, JP; Re: DCRR 9/20/17	.15
9/29/17	Email Chain with AF, AD, JP, MN, TU; Re: Order to Amend Viking	.15
9/29/17	Email chain with AF re scheduling Carnahan depo	.25
9/29/17	Draft and send email to AF re date mediation briefs due	.15
9/29/17	Email chain with AF re draft DCRRs (9.13.17 and 9.20.17)	.50
9/29/17	Draft and send email to AF re digital photos of damage and review AF response	.15
9/29/17	Email chain with AF re drafting Lange written discovery for punitive damages and draft requests	.20
9/29/17	Call with AMF	.15
9/29/17	Review and Revise written discovery to Lange	.25
9/30/17	Call with Client	.25
9/30/17	Receive, Review and Analyze Email from Client with Link	.50
9/30/17	Receive, Review and Analyze Email from Client with Link	.50
9/30/17	Draft and Send Email to Client	.15
9/30/17	Receive, Review and Analyze Email from Client	.15
9/30/17	Draft and Send Email to Client	.15
10/1/17	Receive, Review and Analyze Email from Client with Attachment	.40

10/1/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/2/17	Draft and send email and attachment to AF re Glen Rigdon and a motion to exclude him as an expert	.25
10/2/17	Review and Revise Motion to Reconsider Pro Hac of LA Counsel	1.50
10/2/17	Email Chain with MC, AF, JP; Re: Rimkus DCRR	.25
10/2/17	Receive, Review and Analyze Email from Client	.50
10/2/17	Receive, Review and Analyze Email from Client	.25
10/2/17	Receive, Review and Analyze Email from Client	.50
10/2/17	Draft and Send Email to Client	.15
10/2/17	Receive, Review and Analyze Email from Client	.25
10/2/17	Call with Client	.25
10/2/17	Call with Client	.10
10/2/17	Call with Client	.25
10/3/17	Call with Client	.15
10/3/17	Call with Client	.15
10/3/17	Call with Client	.15
10/3/17	Call with Client	.15
10/3/17	Call with Client	.25
10/3/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/3/17	Receive, Review and Analyze Email from Client	.15
10/3/17	Receive, Review and Analyze Email from Client with Attachment	1.25
10/3/17	Receive, Review and Analyze Email from Client with Attachment	.35
10/3/17	Draft and send email to AF re written discovery to Lange that we need to draft and serve	.25
10/3/17	Email Chain with AF, MC, JP; Re: Rimkus DCRR	.50
10/3/17	Email Chain with DC, JP, MN, KR, SK; Re: OPP to MOT to Compel Carnahan	.15

10/3/17	Email chain with AF re Schedule A of EFT and supplementing in ECC	.15
10/3/17	Prepare and Attend Motion to Exclude Rosenthal	3.25
10/3/17	Draft Interrogatories and Request for Production to Lange Plumbing	.75
10/3/17	Review Plaintiffs' 12 <sup>th</sup> ECC Supplement	.50
10/3/17	Discussion with Nunez	.25
10/3/17	Email chain with AF re Max Couvillier changes to DCRR	.25
10/3/17	Draft and send email to AF re forwarding Viking's Opp to Motion to Compel Carnahan	.25
10/4/17	Prepare and Attend Motion to Compel Carnahan and Motion to De-Designate; Review Oppositions	3.5
10/4/17	Text Message with AMF	.10
10/4/17	Email Chain with D. Holloman; Re: Brief	.15
10/4/17	Review and Revise Mediation Brief	2.25
10/4/17	Review and Revise Motion to Reconsider	1.75
10/4/17	Email Chain with JP, AF; Re: DCRR for Inspections	.15
10/4/17	Receive, Review and Analyze Email from Client with Link	.65
10/4/17	Receive, Review and Analyze Email from Client	.50
10/4/17	Call with Client	.50
10/5/17	Call with AMF	.10
10/5/17	Receive, Review and Analyze Email from Client	.25
10/5/17	Receive, Review and Analyze Email from Client	.40
10/5/17	Receive, Review and Analyze Email From Whitfield	.15
10/6/17	Receive, Review and Analyze Email from Rimkus with Attachment; Forward to Client	.50
10/6/17	Receive, Review and Analyze Email from Client	.15



10/6/17	Email chain with AF re Amended ZAIC Notice and SDT	.15
10/7/17	Call with AMF	.25
10/9/17	Meet with Mediator - Discuss Case	1.5
10/9/17	Email Chain with AD, AF; Re: Extension	.25
10/9/17	Draft and Send Email to Client with Attachment	.15
10/9/17	Draft and Send Email to Client with Attachment	.15
10/9/17	Draft and Send Email to Client with Attachment; Prepare Demand Sheets	.75
10/9/17	Receive, Review and Analyze Email from Client with Links	.50
10/10/17	Receive, Review and Analyze Email from Client	.35
10/10/17	Call with AMF	.10
10/10/17	Call with AMF	.15
10/10/17	Call with Client	.10
10/10/17	Call with Mike Nunez	.10
10/10/17	Call with Client	.10
10/10/17	Draft and Send Email to Client with Attachment	.25
10/10/17	Draft and Send Email to Client and Response	.15
10/10/17	Receive, Review and Analyze Email from Client	.15
10/10/17	Draft and Send Email to Client with Attachment	.15
10/10/17	Receive, Review and Analyze Email from Client with Attachment	.40
10/10/17	Email Chain with AD, AF; Re: Payment of Past Invoices	.50
10/10/17	Email Chain with KR, AF; Re: Michigan Depositions	.25
10/10/17	Attend Mediation at JAMS with Floyd Hale	4.0
10/11/17	Receive, Review and Analyze Email from Client	.25
10/11/17	Receive, Review and Analyze Email from Client	.25
10/11/17	Receive, Review and Analyze Email from Client	.25

10/11/17	Receive, Review and Analyze Email from Client	.50
10/11/17	Receive, Review and Analyze Email from Client	.15
10/11/17	Receive, Review and Analyze Email from Client	.15
10/11/17	Receive, Review and Analyze Email from Client	.35
10/11/17	Email chain with AF re response to Robinson re deposition scheduling	.30
10/11/17	Email chain with AF re UL Depo re-scheduling	.15
10/11/17	Email chain with AF re phone message from Pancoast	.15
10/12/17	Call with Client	.15
10/12/17	Forwarded emails from Wiznet from to AF re filed transcripts	.15
10/12/17	Receive, Review and Analyze Email from Client with Attachment	.25
10/12/17	Draft and Send Email to Client	.15
10/12/17	Receive, Review and Analyze Email from Client	.50
10/12/17	Receive, Review and Analyze Email from Client	.40
10/12/17	Receive, Review and Analyze Email from L. Pomerantz	.25
10/12/17	Receive, Review and Analyze Email from Client	.25
10/12/17	Receive, Review and Analyze Email from Client with Attachment	.35
10/13/17	Email Chain with JP, AF; Re: Interpreter	.25
10/13/17	Email Chain with AF, AD, JP, TU, KR, SK; Re; Privilege Log	.25
10/13/17	Email Chain with AF, SK, AD, MN, JP, TU; Re: Revised Order MOT to Amend	.40
10/14/17	Receive, Review and Analyze Email from Client	.25
10/14/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/15/17	Review Viking Opposition to Plaintiff Motion to Strike & Revise Reply	4.50
10/15/17	Draft and Send Email to Client with Attachment	.15

10/15/17	Receive, Review and Analyze Email from Client	.25
10/15/17	Receive, Review and Analyze Email from Client	.15
10/15/17	Verified with Court Reporter	.25
10/16/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/16/17	Receive, Review and Analyze Email from Client	.25
10/16/17	Receive, Review and Analyze Email from Client	.50
10/16/17	Receive, Review and Analyze Email from Client with Attachment	.25
10/16/17	Receive, Review and Analyze Email from Client with Attachment	.25
10/16/17	Receive, Review and Analyze Email from Client with Attachment	.25
10/16/17	Receive, Review and Analyze Email from Client	.15
10/16/17	Draft and Send Email to Client	.25
10/16/17	Receive, Review and Analyze Email from Client	.15
10/16/17	Draft and Send Email to Client	.15
10/16/17	Draft and Send Email to Client	.15
10/16/17	Receive, Review and Analyze Email from Client	.25
10/16/17	Receive, Review and Analyze Email from Client	.15
10/16/17	Email Chain with Client	.25
10/16/17	Receive, Review and Analyze Email from Client	.25
10/16/17	Email chain with AF re Franson's last known address	.15
10/16/17	Finalize Reply to opposition to Motion to Strike & Attend Margaret Ho Deposition	4.75
10/16/17	Draft and Send Email to GZ; Re: Requesting TC and Deposition Dates	.25
10/16/17	Email Chain with JP, AD, TU, JR; Re: Privilege Log	.15
10/16/17	Draft and send email to AF re Viking's production of Carnahan's depo and review AF response	.15

10/16/17	Draft and send email to AF re production of Rapid Cash ad and review AF response	.15
10/16/17	Email chain with AF re Viking's 15 <sup>th</sup> ECC Supp	.15
10/16/17	Email chain with AF and client re supplementing motion to strike	.15
10/16/17	Call with Client	.25
10/16/17	Call with Client	.50
10/16/17	Call with Client	.15
10/16/17	Call with AMF	.10
10/16/17	Call with AMF	.15
10/16/17	Call with Client	.10
10/17/17	Call with AMF	.15
10/17/17	Call with AMF	.15
10/17/17	Call with Client	.50
10/17/17	Call with Client	.15
10/17/17	Email chain with AF re 2.34 re Pomerantz as expert	.15
10/17/17	Email chain with AF re research for Reply to Lange MSJ	.50
10/17/17	Email chain with AF re depo cites for Reply to Lange MSJ	.75
10/17/17	Review Lange's 11 <sup>th</sup> ECC Supplement	1.25
10/17/17	Draft Motion to Strike Expert Carnahan; Revise Supplement to Motion to Strike Defendants Answer	6.75
10/17/17	Receive, Review and Analyze Email from Client	.40
10/17/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/17/17	Receive, Review and Analyze Email from Client with Attachment and Response	.50
10/17/17	Draft and Send Email to Client	.15
10/17/17	Draft and Send Email to Client with Attachment	.15
10/18/17	Receive, Review and Analyze Email from Client	.40

10/18/17	Draft and Send Email to Client	.15
10/18/17	Receive, Review and Analyze Emails from Client	.35
10/18/17	Receive, Review and Analyze Email from Client	.15
10/18/17	Receive, Review and Analyze Email from Client	.15
10/18/17	Draft and Send Email to Client	.15
10/18/17	Receive, Review and Analyze Email from Client	.15
10/18/17	Receive, Review and Analyze Email from Client	.25
10/18/17	Email Chain with Client	.15
10/18/17	Receive, Review and Analyze Email from Client with Attachment	.25
10/18/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/18/17	Receive, Review and Analyze Email from Client	.25
10/18/17	Receive, Review and Analyze Email from Client	.15
10/18/17	Receive, Review and Analyze Email from Client	.15
10/18/17	Draft and send email to AF re supplement to Motion to strike and review AF response	.75
10/18/17	Prepare and Attend Hearing on Plaintiffs Motion to Strike Defendants Answer	5.25
10/18/17	Review Lange Opposition to Motion for MSJ and draft Reply	2.25
10/18/17	Review Viking Written Discovery Responses and Analyze; Discussion with AF	1.25
10/18/17	Call with Client	.50
10/18/17	Call with Client	.10
10/18/17	Call with Client	.75
10/19/17	Call with Client	.35
10/19/17	Call with Mike Nunez	.15
10/19/17	Call with Mike Nunez	.10

10/19/17	Call with Mike Nunez	.10
10/19/17	Call with Mike Nunez	.15
10/19/17	Call with Client	.50
10/19/17	Revise Reply to Lange Opposition to MSJ	4.0
10/19/17	Draft Supplement to Motion to Strike	2.50
10/19/17	Review Viking's 15 <sup>th</sup> ECC Supplement	1.25
10/19/17	Email Chain with F. Hale, MN, AD, JP, SK, D. Holloman; Re: Mediation	.50
10/19/17	Draft and Send Email to Client	.25
10/19/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/19/17	Receive, Review and Analyze Email from Client	.40
10/19/17	Email Chain with Client	.50
10/19/17	Receive, Review and Analyze Email from Client	.25
10/19/17	Receive, Review and Analyze Email from Client	.15
10/19/17	Draft and Send Email to Client	.15
10/19/17	Draft and send email to AF re supplementing documents including El Segundo letter and review AF response	.20
10/19/17	Email chain with AF re Giberti Motion for Good Faith Settlement and whether we will oppose	.15
10/19/17	Email chain with AF re Olivas depo and Pancoast email	.15
10/20/17	Draft and send email to AF re inserting hidden activation information into supplement and review AF response	.15
10/20/17	Draft and Send Email to Client with Attachment	.15
10/20/17	Call with Client	.15
10/20/17	Receive, Review and Analyze Email from Client with Attachment	.35
10/20/17	Receive, Review and Analyze Email from Client	.25
10/20/17	Receive, Review and Analyze Email from Client	.40

10/20/17	Draft and Send Email to Client	.15
10/20/17	Draft and Send Email to Client with Link	.15
10/20/17	Revise Reply to MSJ	3.25
10/20/17	Revise Supplement to Motion to Strike	3.75
10/20/17	Conference Call with UL Lawyers Susan McNicholas from Chicago & Discussion with AF; Review Subpoena and Notice	1.25
10/21/17	Email Chain with D. Holloman; Re: Mediation	.25
10/21/17	Draft and Send Email to Client with Attachment	.15
10/21/17	Receive, Review and Analyze Email from Client with Attachment	.40
10/21/17	Email Chain with Client with Attachment	.25
10/21/17	Email chain with AF re pre-lien notice form Lange	0.15
10/22/17	Draft and Send Email to Client	.15
10/22/17	Email Chain with Client with Attachment	.25
10/22/17	Revise Supplement to Motion to Strike	1.25
10/23/17	Draft and send email to AF re Opp to Zurich Motion and review AF response	1.0
10/23/17	Revise Supplement to Motion to Strike	1.50
10/23/17	Revise Reply to Lange MSJ	1.75
10/23/17	Review Plaintiff 13 <sup>th</sup> Supplement to ECC; Viking Compliance Documents; Emails; Discussion with AF	1.5
10/23/17	Draft Letter to Lange Dalacas re Lien	.25
10/23/17	Review ZAIC Motion for Protective Order; Draft opposition	1.5
10/23/17	Conversation with Client	.25
10/23/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/23/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/23/17	Email Chain with Client with Attachment	.25

10/23/17	Receive, Review and Analyze Email from Client and Response	.15
10/23/17	Receive, Review and Analyze Email from Client with Attachment	.50
10/23/17	Receive, Review and Analyze Email from Client	.25
10/23/17	Draft and Send Email to Client	.15
10/23/17	Email chain with AF re supplement to motion to strike	.20
10/23/17	Call with Client	.15
10/24/17	Call with Client	.10
10/24/17	Call with Client	.25
10/24/17	Call with Mike Nunez	.15
10/24/17	Call with Client	.25
10/24/17	Call with Mike Nunez	.25
10/24/17	Call with Client	.25
10/24/17	Call with Client	.50
10/24/17	Review Email from ZAIC; Review attachment; Draft Reply Email	.75
10/24/17	Attend DC Hearing; Status Check	2.25
10/24/17	Draft Supplemental Reply - MSJ Lange	2.5
10/24/17	Review Viking Correspondence re competing DCRR's	1.0
10/25/17	Revise Written Discovery to Viking ; Discussion with AF	1.5
10/25/17	Email Chain with AF, AD, SK, TU, MN, JP; Re: DCRR 10/4/17	.25
10/25/17	Email Chain with EC, JP, MN, AD, TP; Re: 16 <sup>th</sup> Supp	.50
10/25/17	Email Chain with Client with Attachments	.25
10/25/17	Receive, Review and Analyze Email from Client	.25
10/25/17	Receive, Review and Analyze Email from Client	.40
10/25/17	Draft and Send Email to Client	.15
10/25/17	Receive, Review and Analyze Email from Client with Attachment	.25



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
10/26/17	Call with Client	.15
10/26/17	Call with Client	.25
10/26/17	Call with Client	.25
10/26/17	Call with AMF	.20
10/26/17	Receive, Review and Analyze Email from Client with Attachment	.35
10/26/17	Receive, Review and Analyze Email from Client	.25
10/26/17	Receive, Review and Analyze Email from Client with Attachment	.40
10/26/17	Receive, Review and Analyze Email from Client with Attachment	.75
10/26/17	Receive, Review and Analyze Email from Client	.40
10/26/17	Email Chain with Client; Settlement Offer	.15
10/26/17	Draft and Send Email to Client with Link	.15
10/26/17	Draft and Send Email to Client	.25
10/26/17	Receive, Review and Analyze Email from Client	.50
10/26/17	Review Viking's 16 <sup>th</sup> ECC Supplement	0.75
10/26/17	Revise Written Discovery to Viking ; Discussion with AF	1.25
10/26/17	Discussion with Lange Counsel: Mr. Parker	.50
10/26/17	Email Chain with AF, AD, TU, SK, IB, MN, JP; Re: Order Rosenthal	.15
10/27/17	Call with Client	.40
10/27/17	Call with AMF	.10
10/27/17	Call with Client	.10

10/27/17	Call with AMF	.15
10/27/17	Email Chain with D. Holloman, AD, JP, MN, SK, NG; Re: Mediation	.25
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
10/27/17	Draft and Send Email to Client	.15
10/27/17	Draft and Send Emails to Client with Links	.25
10/27/17	Receive, Review and Analyze Email from Client	.25
10/30/17	Receive, Review and Analyze Email from Client	.25
10/30/17	Draft and Send Email to Client with Link	.15
10/30/17	Draft and Send Email to Client with Link	.15
10/30/17	Draft and Send Email to Client with Link	.15
10/30/17	Receive, Review and Analyze Email from Client	.15
10/30/17	Draft and Send Email to Client	.40
10/30/17	Receive, Review and Analyze Email from Client	.25
10/30/17	Receive, Review and Analyze Email from Client	.40
10/30/17	Receive, Review and Analyze Email from Client	.25
10/30/17	Receive, Review and Analyze Emails from Client with Attachment	.25
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
10/30/17	Call with Client	.50
10/31/17	Call with Client	.10
10/31/17	Email Chain with KR, AF, JP, SK; Re: Carnahan Deposition	.50
10/31/17	Email Chain with AF, KR, TP, JP; Re: DCRR 10/24/17	.15
10/31/17	Draft and send email to AF re email to Pancoast re English version of the insurance policy and review AF response	.15
10/31/17	Email chain with AF re UL notice and UL production of documents	.15
10/31/17	Prepare and Attend Hearing on MSJ	3.0
10/31/17	Draft Reply to Viking Opposition to Exclude Carnahan	2.75
10/31/17	Revise DCCR Re: 10-24-17 Hearing	.50
10/31/17	Review and revise written discovery to Viking	.75
11/1/17	Email Chain with GZ; Re: Additional Deposition Dates	.25
11/1/17	Call with Mike Nunez	.25
11/1/17	Call with Client	.50
11/1/17	Call with Client	.50
11/1/17	Email chain with AF re Viking document production (Martorano's depo in FSS and Thorpe)	.50
11/1/17	Draft and send email to AF re calendar and deposition re-scheduling	.15
11/1/17	Draft and send email and attachment to AF re picture for reply	.15
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
11/1/17	Draft and Send Email to E. Chun with Link; Forward to Client	.25

11/1/17	Draft and Send Email to Client	.15
11/1/17	Receive, Review and Analyze Email from Client with Attachment	.15
11/1/17	Receive, Review and Analyze Email from Client with Attachment	.15
11/1/17	Receive, Review and Analyze Email from Client	.15
11/1/17	Receive, Review and Analyze Email from Client with Attachment	.25
11/1/17	Draft and Send Email to Client	.15
11/1/17	Draft and Send Email to Client and Response	.15
11/1/17	Receive, Review and Analyze Email from Client	.15
11/1/17	Receive, Review and Analyze Email from Client	.15
11/1/17	Receive, Review and Analyze Email from Client with Attachment	.25
11/1/17	Draft and Send Email to Client and Response	.15
11/1/17	Receive, Review and Analyze Email from Client	.15
11/2/17	Call with AMF	.35
11/2/17	Receive, Review and Analyze Email from Client	.50
11/2/17	Receive, Review and Analyze Email from Client	.15
11/2/17	Email Chain with D. Holloman; Re: Mediation	.50
11/2/17	Email Chain with KR, AF, JP, SK; Re: Depositions	.30
11/2/17	Revise Motion to Compel Financials	2.25
11/2/17	Revise Motion to Compel Depos and Reports	2.75
11/2/17	Email Chain with D. Holloman; Re: Payment of Fees	.25
11/3/17	Call with Mike Nunez	.25
11/3/17	Call with Client	.10
11/3/17	Call with Client	.10
11/3/17	Email Chain with KR, AF, JP, TP, SK; Re: DCRR 10/24/17	.25
11/3/17	Email Chain with KR, JP, SK; Re: Discovery Production	.75
11/3/17	Email Chain with KR, JP, TP, SK, AF; Re: DCRR 10/24/17	.50

11/3/17	Draft and Send Emails to Client	.15
11/3/17	Revise plaintiffs reply to Motion to Reconsider	1.75
11/4/17	Text Message with Teddy Parker	.10
11/4/17	Text Message with Teddy Parker	.10
11/6/17	Email Chain with D. Holloman, JP, TP, ES; Re: Mediation	.25
11/6/17	Email Chain with JP, AF; Re: Excess Policy	.15
11/6/17	Draft and Send Email to Client and Response	.15
11/6/17	Draft and Send Email to Client with Attachment	.15
11/6/17	Receive, Review and Analyze Email from Client	.25
11/6/17	Draft and Send Email to Client	.15
11/6/17	Draft and Send Email to Client with Attachment and Response	.25
11/6/17	Email Chain with Client	.25
11/6/17	Draft and send email to AF re calling UL attorney and review AF response	.15
11/6/17	Draft and send email to AF re mediation and review AF response	.15
11/6/17	Revise Edgeworth Responses to Request to Produce cancelled checks; and Request for Evidence of Activations and Witness for Activations	.75
11/6/17	Revise Plaintiffs Reply to Exclude Carnahan	3.75
11/6/17	Call with Client	.25
11/6/17	Call with Client	.25
11/6/17	Call with Client	.25
11/6/17	Email Chain with D. Holloman; Re: Response to OJ and Lange Attendance	.50
11/6/17	Review Viking Correspondence re competing DCRR's	1.0
11/7/17	Call with AMF	.25
11/7/17	Call with Client	.40

11/7/17	Email to CP with Attachments Re: Viking Opp to Mot to Strike	.20
11/7/17	Draft and send email to AF re drafting motion to compel financial information from Lange and review AF response	.15
11/7/17	Review letter from Lange; Disc. with Parker; Respond to Emails from Mediator; Discussion with AF	1.25
11/7/17	Review Viking's 17 <sup>th</sup> ECC Supplement	.50
11/7/17	Forward email to AF with attached letter from Parker	.25
11/7/17	Draft and send email to AF re sending information to Pomerantz and review AF response	.20
11/8/17	Discussion with Pomerantz	.50
11/9/17	Discussion with Lange Attorney Parker	.50
11/9/17	Review research re: cost of repairs and diminution in value damages; discussion with BJM	.75
11/9/17	Call with Client	.25
11/9/17	Discussion with Attorney AF; UL Attorney Conference Call; Notice of Deposition of Dalacus; Notice of Deposition of Court Reporter of Rene Stone; Telephone Conference to Robinson setting Carnahan Deposition; Conference Call with DC Bulla re: confidentiality	.75
11/9/17	Revise letter and DCRR to send to Court; Discussion with AF	.75
11/9/17	Review Viking's 18 <sup>th</sup> ECC Supplement	.50
11/9/17	Email Chain with AF/CP with Attachments	.15
11/9/17	Draft and Send Email to Client	.15
11/9/17	Receive, Review and Analyze Email from Client with Attachment	.50
11/9/17	Draft and send email to AF re resending information to Pomerantz and review AF response	.15
11/9/17	Forward email to AF from Olivas with job file for deposition	.50
11/10/17	Email Chain with F. Hale, JP, MC, KR; Re: Mediator Proposal	.25
11/10/17	Attended Mediation	4.0

11/11/17	Email Chain with Client with Attachment; Review and Analyze Mediator Proposal	.50
11/13/17	Draft and send email with attachments to AF	.15
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
11/13/17	Email chain with AF re complaint filed against Harold Rodgers	.25
11/13/17	Draft and send email to AF re research re privilege log and confidentiality issues and review AF response	.75
11/13/17	Draft and send email to AF re supplementing Pomerantz opinion letter	.15
11/13/17	Email chain with AF re expert depositions noticed by Viking	.15
11/13/17	Prepare for 11/14/17 Hearings	2.25
11/13/17	Review Pomerantz Report and Produce; Discussion with Pomerantz; Discussion with Charles Rego from UL and Client	2.75
11/13/17	Receive, Review and Analyze Email From JO; Re: Additional Emails	.25
11/13/17	Email Chain with AF/CP with Attachments Re: Henderson	.15
11/13/17	Email from CP with Opinion letter	.75
11/13/17	Receive, Review and Analyze Email from Client	.15
11/13/17	Receive, Review and Analyze Email from Client; Discussion with Client	.25
11/13/17	Email Chain with Client with Attachment	.50
11/13/17	Draft and Send Email to Client	.15
11/13/17	Email Chain with Client	.15
11/13/17	Email Chain with Client	.50
11/13/17	Receive, Review and Analyze Email from Client	.15
11/13/17	Draft and Send Email to Client with Attachment	.15

11/13/17	Receive, Review and Analyze Email from Client	.25
11/13/17	Call with Client	.50
11/13/17	Call with Client	.25
11/14/17	Call with AMF	.10
11/14/17	Call with Client	.15
11/14/17	Call with Client	.10
11/14/17	Call with Client	.10
11/13/17	Email Chain with Client	.40
11/14/17	Email Chain with JP, AF, TP; Re: Inspection of Documents	.25
11/14/17	Email Chain with D. Holloman, JP, KR, JM; Re: Hale Settlement Matters	.25
11/14/17	Attend Hearings on MSJ; Review File with Client; Review Research; Prepare Emails to Pancoast Re: Depositions and Discovery Responses; Discussion with Attorney Olgivie Re: Retention; Email to Parker; Discussion with AF; Review Plaintiffs' 14 <sup>th</sup> ECC Supplement; Review files	7.5
11/14/17	Draft and Send Email to Ogilvie with Attachments	.75
11/14/17	Telephone Call with Ogilvie Regarding Retention	.50
11/15/17	Review cases re: validity of contract under NRS 624; discussion with AF and BM	2.75
11/15/17	Review research re: admissibility of litigation conduct; discussion with BJM	.75
11/15/17	Discussion with BJM re: recoverable damages w/ breach of contract vs. product liability	.75
11/15/17	Receive, Review and Analyze Email from Client	.15
11/15/17	Receive, Review and Analyze Email from Client	.25
11/15/17	Receive, Review and Analyze Email from Client with Link	.40
11/15/17	Call with Client	.25
11/15/17	Call with Client	.50



11/15/17	Call with Client	.25
11/15/17	Call with Client	.10
11/15/17	Call with Client	.10
11/15/17	Call with Client	.75
11/16/17	Call with Client	.25
11/16/17	Call with Client	.25
11/16/17	Call with AMF	.15
11/16/17	Call with Client	.15
11/16/17	Call with Client	.10
11/17/17	Call with Client	.15
11/17/17	Call with Teddy Parker	.10
11/17/17	Call with Teddy Parker	.10
11/17/17	Call with Client	.50
11/17/17	Call with Client	.25
11/17/17	Call with Teddy Parker	.10
11/17/17	Call with Teddy Parker	.15
11/17/17	Call with Teddy Parker	.15
11/17/17	Call with Client	.65
11/17/17	Call with Client	.15
11/17/17	Email Chain with EC, JP, AF, MN, TP, KR; Re: Olivas Deposition	.15
11/17/17	Draft and Send Email to Ogilvie with Links	.25
11/17/17	Prepare and Attend Hearings	4.5
11/17/17	Several discussions with clients from office	.50
11/17/17	Receive, Review and Analyze Email from Client with Link	.40
11/17/17	Receive, Review and Analyze Email from L. Rotert; Pomerantz Bill	.15
11/18/17	Draft and Send Email to Client with Links	.15

11/18/17	Email Chain with JP, AF, TP, BP, JH, KR; Re: MIL Meeting. Discovery with AF.	.50
11/20/17	Email chain with AF re outstanding expert bills	.25
11/20/17	Email chain with AF re meet and confer for MILS and hearing for Giberti's MGFS	.25
11/20/17	Email chain with AF re Knez letter and threat of motion to file protective order in CA for Rodgers and Rene Stone depositions	.25
11/20/17	Email Chain with Ogilvie and AF; Re: Permit App	.25
11/20/17	Receive, Review and Analyze Email from Client; Forward to AF	.15
11/21/17	Receive, Review and Analyze Email from Client	.25
11/21/17	Call with Client	.10
11/22/17	Draft and send email to AF re recent list of damages and review AF response	.15
11/22/17	Email Chain with Ogilvie, AF with Attachments; Re: Lange Supp Brief	.15
11/22/17	Draft and send email to AF re sending Lange responses brief to Ogilvie and review AF response	.15
11/22/17	Review notices of vacating deposition of Rene Stone and Harold Rodgers	.50
11/22/17	Review Lange's 12 <sup>th</sup> ECC Supplement	.25
11/24/17	Review correspondence from Dalacas	.25
11/24/17	Review email filings and depo emails	1.50
11/25/17	Call with Client	.10
11/25/17	Call with Client	.10
11/25/17	Call with Client	.15
11/26/17	Review Lange Discovery responses and attachments	1.50
11/27/17	T/C with J. Olivas re deposition	.35
11/27/17	Review hearing transcript from 11/14/17 hearing	1.50

11/27/17	T/C with T. Parker and Henriod (x3)	.75
11/27/17	Conference call with T. Parker, J. Pancoast and JEA to continue hearings; Emails	1.0
11/27/17	Receive, Review and Analyze Email From JO; Re: Final Invoice	.25
11/27/17	T/C's with Teddy Parker	.65
11/27/17	Email Chain with JP, TP, AF, KR, DP, JH; Re: MIL / Expert Depositions	.50
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
11/27/17	Receive, Review and Analyze Email from Client	.25
11/27/17	Draft and send email to AF re Carnahan depo and review AF response	.15
11/28/17	Email Chain with JP, AF, KR, JH; Re: Outstanding Discovery	.15
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
11/28/17	Review Amended Notice of Carnahan Depo	.25
11/28/17	Conference call with Judge Bulla chambers w/ Pancoast to reset December 1 <sup>st</sup> hearings to December 20 <sup>th</sup> and call with Pancoast separately	.50
11/28/17	Review notices of vacating depositions	.50
11/28/17	Email Chain with Ogilvie to Discuss Case	.15
11/29/17	Receive and analyze email from Ogilvie	1.50
11/29/17	Email Chain with EN, JP, TP; Re: Letter from Parker	.50
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
11/29/17	Email from client Angela Edgeworth	.15
11/29/17	Email response to client Angela Edgeworth	.25
11/29/17	Review and analyze email from Oligilvie re: contractors license legal arguments and response email to Oligilvie; Discussion with AF	1.50
11/29/17	Draft reply to Lange's Supplemental Opposition to Plaintiffs' MSJ	2.75
11/29/17	Discussions w/ J. Henriod re moving hearings and settlement	.65
11/29/17	T/C with T. Parker	.50
11/29/17	Draft letter to Parker	.50
11/30/17	Review release; T/C J. Greene; T/C T. Parker; revise release	1.25
11/30/17	Call with Teddy Parker	.15
11/30/17	Call with Teddy Parker	.15
11/30/17	Call with Teddy Parker	.10
11/30/17	Call with AMF	.25
11/30/17	Call with Teddy Parker	.15
11/30/17	Call with AMF	.10
11/30/17	Call with AMF	.10
11/30/17	Call with AMF	.20
11/30/17	Call with AMF	.10
11/30/17	Review file for Lange bills, T/C to Parker re: settlement	.75
11/30/17	Negotiate release w/ Henriod (his office)	3.50
11/30/17	Conversation w/ Green; draft email, send release	.75
11/30/17	Receive and review letter dated 11-30-17	.25

11/30/17	Received and reviewed Lange letter (11-29-17) regarding scheduling discovery; Discussion with AF	.75
11/30/17 & 12/2/17	Email chain with AF re attorney lien	.15
12/1/17	Email Chain with JP, AF, DP, JH, MB, KR; Re: Discovery Motions	.15
12/1/17	Receive and review release email to Defendant	.75
12/1/17	Receive and review release email from Pancoast & discussion with AF	.50
12/1/17	Review Viking's 19 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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
	<b>Total Hours</b>	<b>866.20</b>
	<b>Total Fees at \$550 per hour</b>	<b>\$476,410.00</b>



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

<b>DATE</b>	<b>DESCRIPTION</b>	<b>TIME</b>
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 Diorio	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 Diorio	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 Dioro	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 <sup>th</sup> 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 OOI	0.25
3.17.17	Email chain with Sia re OOI 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>rd</sup> 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 <sup>rd</sup> 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 <sup>st</sup> Set of Interrogatories to Defendants The Viking Corporation	0.30
4.27.17	Review, Download & Save Plaintiffs' 1 <sup>st</sup> 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 <sup>nd</sup> 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 <sup>rd</sup> Supplemental Disclosure Pursuant to NRCP 16 (a)(1)	0.30
5.2.17	Email chain with DSS requesting Viking 30(b)(6) notice, 3 <sup>rd</sup> 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 <sup>th</sup> 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 <sup>th</sup> hearing	0.15
5.5.17	Review email and attachment from DSS to Bullock re 3 <sup>rd</sup> 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 <sup>st</sup> 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 <sup>st</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>nd</sup>	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 Plaintiff'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 Supply 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 DCCR	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 <sup>th</sup> 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 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

6.20.17	Review, Download & Save Lange's 7 <sup>th</sup> Supplemental Disclosures	0.30
6.20.17	Review, Download & Save Defendants The Viking Corp and Supply Network, Inc.'s 5 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 Discoveryh	0.30
7.6.17	Review, Download & Save Defendant The Viking Corp and Supply Network, Inc.'s 6 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>th</sup> Supplement to Early Case Conference Witness and Exhibit List	0.30

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

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 <sup>nd</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 DCRR 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> Set of Interrogatories to Defendants The Viking Corp	0.30
7.26.17	Review, Download & Save Plaintiffs 2 <sup>nd</sup> 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 Rinkus Consulting Group, Inc.	0.30
7.27.17	Review, Download & Save Plaintiffs 1 <sup>st</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> Set of Requests for Admission to Defendants the Viking Corp	0.30
8.14.17	Review, Download & Save Plaintiffs 3 <sup>rd</sup> Set of Requests for Production to Defendants	0.30
8.14.17	Review, Download & Save Plaintiffs' 3 <sup>rd</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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'Connaw	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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> Supplement; review of Viking entire 6 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>rd</sup> 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 <sup>nd</sup> 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 <sup>st</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 depositions	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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>th</sup> Supplemental Disclosures Pursuant to NRCP 16(a)(1)	0.30

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

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 <sup>th</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>st</sup> set of Rogs	0.5
9/22/17	Review Viking's Responses to Plaintiffs' 3 <sup>rd</sup> Set of RFAs	0.25
9/22/17	Review Viking's Responses to Plaintiffs' 3 <sup>rd</sup> Set of RFPs	0.25
9/22/17	Draft and Serve Plaintiffs' 10 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>th</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>nd</sup> set of Rogs	0.5
9/25/17	Draft DCCR for 9/20/17 Hearing	1.25
9/25/17	Draft DCCR 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 <sup>th</sup> and 26 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>th</sup> Supplement to Early Case Conference Witnesses and Exhibit List	0.30
9/28/17	Draft and serve Plaintiffs' 11 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>nd</sup> Set of Requests for Production to Lange Plumbing, LLC	0.30
9.29.17	Review, Download & Save Plaintiffs' 2 <sup>nd</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 DCCR 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>rd</sup> Set of Requests for Production to Lange Plumbing, LLC	0.30
10.3.17	Review, Download & Save Plaintiffs' 3 <sup>rd</sup> 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 <sup>th</sup> ECC Supplement	1.0

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

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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>st</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>nd</sup> Amended Notice of Taking Deposition of Harold Rodgers Duces Tecum	0.30
10.12.17	Review, Download & Save Plaintiffs' 2 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>th</sup> 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 <sup>th</sup> Supplemental 16.1 Disclosures	0.30
10.16.17	Review, Download & Save Defendants The Viking Corporation and Supply Network, Inc.'s 15 <sup>th</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>th</sup> ECC Supplement and Lange' 11 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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 <sup>th</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>th</sup> 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 Exlude 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 <sup>th</sup> Set of Interrogatories to Defendants The Viking Corporation	0.30
10.26.17	Review, Download & Save Plaintiffs' 6 <sup>th</sup> Set of Requests for Production to Defendants The Viking Corporation	0.30
10.26.17	Review, Download & Save Plaintiffs' 5 <sup>th</sup> 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 OOI	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 <sup>th</sup> Set of Requests for Admission to Defendants The Viking Corporation	0.30
11.1.17	Review, Download & Save Plaintiffs 6 <sup>th</sup> Set of Interrogatories to Defendants the Viking Corporation	0.30
11.1.17	Review, Download & Save Plaintiffs 7 <sup>th</sup> Set of Requests for Production to Defendants the Viking Corporation	0.30

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

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 <sup>th</sup> 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 <sup>th</sup> set of RFP and attached cases	2.5
11.3.17	Review email from DSS to Robinson re DCCR from 10/24/17 hearing	0.15
11/3/17	Review letter from Robinson re revisions to the 10/24/17 DCCR; 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 <sup>th</sup> Set of RFP's and analysis	0.75
11.3.17	Review email and attachment from Robinson re changes to the 10.24.17 DCCR	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 DCCR	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 <sup>th</sup> ECC Supplement	0.50

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

11/6/17	Revise Reply Plaintiffs MIL to Exclude Carnahan	3.25
11/6/17	Review Viking's 17 <sup>th</sup> ECC Supplement	1.5
11/6/17	Review Viking's 16 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 <sup>th</sup>	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 DCRR 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

11/8/17	Review Viking's 18 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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

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

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 <sup>th</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>th</sup> 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 <sup>rd</sup> Set of Requests for Production	0.30
11.17.17	Review, Download & Save Lange plumbing, LLC's Answers to Plaintiffs' 3 <sup>rd</sup> Set of Interrogatories	0.30
11.17.17	Review, Download & Save Lange Plumbing, LLC 's Responses to Plaintiffs' 2 <sup>nd</sup> Set of Requests for Production	0.30
11.17.17	Review, Download & Save Lange Plumbing, LLC's Answers to Plaintiffs' 2 <sup>nd</sup> 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 <sup>nd</sup> 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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

11/17/17	Prepare and attend Hearing for Zurich motion for protective order, Viking Motion to Strike Pomerantz, Viking motion to Stay Enforcement of DCCR, Plaintiff Motion to Compel Financials, Plaintiff motion to Compel Discovery	3.0
11/17/17	Review Lange Plumbing's 12 <sup>th</sup> 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 depos	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**  
**EDGEWORTH v. LANGE PLUMBING, ET AL.**

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 depos 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

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

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 <sup>th</sup> 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 <sup>th</sup> 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**  
***EDGEWORTH v. LANGE PLUMBING, ET AL.***

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 <sup>nd</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> and 15 <sup>th</sup> 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 <sup>th</sup> Supplement to 16.1 ECC List Witnesses and Docs	0.30

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

12.8.17	Review, Download & Save Lange Plumbing 14 <sup>th</sup> 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 <sup>th</sup> ECC Supplement and response	0.25
12.11.17	Review email from DSS re Lange's 15 <sup>th</sup> 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
<b>TOTAL HOURS x \$275 per hour (reduced)</b>		<b>762.6</b>
<b>TOTAL FEES</b>		<b>\$209,715.00</b>

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

<b>Date</b>	<b>Description</b>	<b>Time</b>
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
	<b>Total Hours x's \$275 per hour (reduced)</b>	<b>21.8</b>
	<b>Total Fees</b>	<b>\$5,995.00</b>