#### IN THE SUPREME COURT OF THE STATE OF NEVADA

NANYAH VEGAS, LLC, A Nevada limited

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable

Trust; ELDORADO HILLS, LLC, a Nevada

limited liability company; TELD, LLC, a

Nevada limited liability company; PETER

ELIADES, individually and as Trustee of the

The Eliades Survivor Trust of 10/30/08; and IMITATIONS, LLC, a Nevada limited liability

Respondents.

AND RELATED MATTERS.

Appellant,

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liability company,

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Elizabeth A. Brown
Supreme Courclesk of 94 preme Court

Eighth Judicial District Court

Eighth Judicial District Court Case No. A-16-746239-C

Case No. A-13-686303-C

## JOINT APPENDIX VOL. 38

MARK G. SIMONS, ESQ. Nevada Bar No. 5132 SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., #F-46 Reno, Nevada 89509 T: (775) 785-0088 F: (775) 785-0087

Email: <u>msimons@shjnevada.com</u> Attorney for Appellant

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<u>ALPHABETICAL</u>					
DOCUMENT	DATE	VOL.	BATES		
Amended Answer to First Amended Complaint; and Counterclaim Jury Demand	9/16/14	3	JA_000665-675		
Answer to First Amended Complaint and Counterclaim	11/8/13	1	JA_000048-59		
Answer to Counterclaim	2/20/14	1	JA_000060-63		
Appendix of Exhibits to Defendants Eldorado Hills, LLC, Peter Eliades, Individually and as Trustee of The Eliades Survivor Trust of 10/30/08, and Teld, LLC' Memorandum of Costs and Disbursements Volume 1 of 2	10/7/19	34-35	JA_008121-8369		
Appendix of Exhibits to Defendants Eldorado Hills, LLC, Peter Eliades, Individually and as Trustee of The Eliades Survivor Trust of 10/30/08, and Teld, LLC' Memorandum of Costs and Disbursements Volume 2 of 2	10/7/19	35	JA_008370-8406		
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1	Appendix of Exhibits to	6/1/18	9	JA_002123-2196
2	Eldorado Hills, LLC's			
3	Motion for Summary Judgment Volume 2 of 2			
4	Appendix of Exhibits to	6/1/18	9-10	JA_002212-2455
5	Defendants Peter Eliades, Individually and as Trustee			
6	of The Eliades Survivor			
7	Trust of 10/30/08, and Teld,			
8	LLC's Motion for Summary Judgment Volume 1 of 2			
9	Appendix of Exhibits to	6/1/18	10-11	JA_002456-2507
10	Defendants Peter Eliades, Individually and as Trustee			
11	of The Eliades Survivor			
12	Trust of 10/30/08, and Teld,			
13	LLC's Motion for Summary Judgment Volume 2 of 2			
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17	Declaration of Brenoch Wirthlin in Further Support	2/28/2020	38	JA_009104-9108
18	of Rogich Defendants			
19	Motion for Attorneys' Fees			
20	Declaration of Joseph A. Liebman in Further Support	2/21/2020	38	JA_009098-9103
21	of Defendants Peter Eliades			
22	and Teld, LLC's Motion for Attorneys' Fees			
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1 2 3 4 5 6	Defendant Eldorado Hills, LLC's Motion in Limine to Preclude Any Evidence or Argument Regarding an Alleged Implied-In-Fact Contract Between Eldorado Hills, LLC and Nanyah Vegas, LLC	9/7/18	14	JA_003358-3364
7 8 9	Defendant Eldorado Hills, LLC's Motion for Dismissal with Prejudice Under Rule 41(e)	7/22/19	33	JA_007868-7942
10 11	Defendant Eldorado Hills, LLC's Motion for Summary Judgment	6/1/18	8	JA_001850-1861
12 13	Defendant Eldorado Hills, LLC's Motion for Summary Judgment	5/22/19	32	JA_007644-7772
14 15 16 17	Defendant Eldorado Hills, LLC's Motion to Extend the Dispositive Motion Deadline and Motion for Summary Judgment	1/25/19	14-15	JA_003473-3602
18 19 20	Defendant Eldorado Hills, LLC's Objections to Nanyah Vegas, LLC's 2 <sup>nd</sup> Supplemental Pre-trial Disclosures	4/9/19	27	JA_006460-6471
<ul><li>21</li><li>22</li><li>23</li><li>24</li></ul>	Defendant Eldorado Hills, LLC's Opposition to Nanyah Vegas, LLC's Countermotion for NRCP 15 Relief	4/9/19	27	JA_006441-6453
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1	Defendant Eldorado Hills,	9/19/18	14	JA_003365-3368
2	LLC's Opposition to Nanyah			
3	Vegas, LLC's Motion in Limine #3: Defendants			
4	Bound by their Answers to			
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5	Defendant Eldorado Hills,	4/4/19	26	JA 006168-6188
6	LLC's Opposition to Motion			_
7	to Reconsider Order on			
8	Nanyah's Motion in Limine #5: Parol Evidence Rule			
9		2/15/19	17	IA 004170 4192
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10	Vegas, LLC's Motion for			
11	Summary Judgment			
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13	LLC's Opposition to Nanyah			
14	Vegas, LLC's Motion in Limine #5 re: Parol			
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15	Defendant Eldorado Hills,	3/8/19	23	JA 005624-5630
16	LLC's Opposition to Nanyah			_
17	Vegas, LLC's Motion in			
18	Limine #6 re: Date of Discovery			
19	Defendant Eldorado Hills,	3/20/19	24	JA 005793-5818
20	LLC's Opposition to Nanyah	3,20,15		
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21	Settle Jury Instructions  Regard upon the Court's			
22	Based upon the Court's October 5, 2018, Order			
23	Granting Summary			
24	Judgment			
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Defendant Eldorado Hills, LLC's Reply in Support of its Motion for Summary Judgment and Opposition to Countermotion for Summary Judgment	7/19/18	13	JA_003083-3114
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Defendants' Answer to Complaint	4/24/17	4	JA_000831-841

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Defendants' First Amended Answer to Complaint	1/23/18	4	JA_000871-880
Defendants' Motion in Limine to Preclude Plaintiff Carlos Huerta From Presenting at Trial any Contrary Evidence as to Mr. Huerta's Taking of \$1.42 million from Eldorado Hills, LLC as Go Global, Inc.'s Consulting Fee Income to Attempt to Refinance	2/25/19	21	JA_005024-5137
Defendants' Motion in Limine to Preclude the Altered Eldorado Hills' General Ledger and Related Testimony at Trial	2/25/19	20-21	JA_004792-5023
Defendants Peter Eliades, Individually and as Trustee of The Eliades Survivor Trust of 10/30/08, Eldorado Hills, LLC, and Teld, LLC's: (1) Reply in Support of their Joinder to Motion for Summary Judgment; and (2) Opposition to Nanyah Vegas, LLC's Countermotion for Summary Judgment and for N.R.C.P. 56(f) Relief	4/11/18	7	JA_001502-1688
Defendants Peter Eliades, individually and as Trustee of The Eliades Survivor Trust of 10/30/08, Eldorado Hills, LLC, and Teld, LLC's Joinder to Motion for Summary Judgment	3/5/18	6	JA_001246-1261

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1	Defendants Peter Eliades,	6/14/18	11	JA_002570-2572
2	Individually and as Trustee			
	of The Eliades Survivor			
3	Trust of 10/30/08, Eldorado			
4	Hills, LLC, and Teld, LLC's			
5	Joinder to Defendants			
١	Sigmund Rogich,			
6	Individually and as Trustee of the Rogich Family			
7	Irrevocable Trust and			
	Imitations, LLC's Motion		ı	
8	for Reconsideration			
9		5/11/18	8	TA 001922 1925
10	Defendants Peter Eliades, Individually and as Trustee	3/11/16	0	JA_001822-1825
:	of the Eliades Survivor Trust			
11	of 10/30/08, Eldorado Hills,			
12	LLC, and Teld, LLC's			
13	Notice of Non-Opposition to			
13	Nanyah Vegas, LLC's			
14	Motion to Continue Trial			
15	and to Set Firm Trial Date			
16	on Order Shortening Time			
16	Defendants Peter Eliades,	6/21/18	12-13	JA_002952-3017
17	Individually and as Trustee			
18	of The Eliades Survivor			
	Trust of 10/30/08, Eldorado			
19	Hills, LLC and Teld, LLC's			
20	Opposition to Nanyah			
21	Vegas, LLC's Motion to Reconsider Order Partially			
21	Granting Summary			
22	Judgment			
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1	Defendants Eldorado Hills,	10/7/19	34	JA_008107-8120
2	LLC, Peter Eliades,			
3	Individually and as Trustee of the Eliades Survivor Trust			
4	of 10/30/08, and Teld,			
	LLC's Memorandum of			
5	Costs and Disbursements			
6	Defendants Peter Eliades,	6/1/18	9	JA_002197-2211
7	Individually and as Trustee of The Eliades Survivor			
8	Trust of 10/30/08, and Teld,			
9	LLC's Motion for Summary			
10	Judgment			
	Defendants Peter Eliades,	7/19/18	13	JA_003115-3189
11	Individually and as Trustee of the Eliades Survivor Trust			
12	of 10/30/08, and Teld,			
13	LLC's Reply in Support of			
14	Their Motion for Summary			
15	Judgment and Opposition to Countermotion for Summary			
16	Judgment			
	Defendants Peter Eliades,	10/28/19	36-37	JA 008820-8902
17	Individually and as Trustee			_
18	of The Eliades Survivor Trust of 10/30/08, Teld,			
19	LLC, and Eldorado Hills,			
20	LLC's: (1) Opposition to			
21	Nanyah Vegas, LLC's			
22	Motion to Retax Costs; and (2) Countermotion to Award			
	Costs			
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1	Defendants Sigmund	10/7/19	33	JA_008073-8106
2	Rogich, Individually and as			
3	Trustee of the Rogich Family Irrevocable Trust,			
4	and Imitations, LLC's			
	Amended Memorandum of			
5	Costs and Disbursements Pursuant to NRS 18.005 and			
6	NRS 18.110			
7	Defendants Sigmund	10/8/19	35	JA 008407-8422
8	Rogich, Individually and as	10/0/19		011_000107 0122
9	Trustee of the Rogich			
10	Family Irrevocable Trust, and Imitations, LLC's Errata			
11	to Amended Memorandum			
ŀ	of Costs and disbursements			
12	Pursuant to NRS 18.005 and NRS 18.110			
13		C   E   1 0	11	IA 002525 2550
14	Defendants Sigmund Rogich, Individually and As	6/5/18	11	JA_002535-2550.
15	Trustee of the Rogich			
16	Family Irrevocable Trust and			
17	Imitations, LLC' Motion for Reconsideration			
18	Defendants Sigmund Rogich	2/18/19	17-19	JA 004183-4582
	as Trustee of The Rogich	<b>2</b> (10)17		011_001103 1302
19	Family Irrevocable Trust,			·
20	Sigmund Rogich,   Individually and Imitations,			
21	LLC's Omnibus Opposition			
22	to (1) Nanyah Vegas LLC's			
23	Motion for Summary			
24	Judgment and (2) Limited Opposition to Eldorado		!	
	Hills, LLC's Motion for			
25	Summary Judgment			
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Defendants Sigmund Rogich Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Opposition to Motion to Reconsider Order Partially Granting Summary	6/14/18	11	JA_002553-2569
Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Opposition to Nanyah's Motion in Limine #3 re Defendants Bound by their Answers to Complaint	9/28/18	14	JA_003387-3390
Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Opposition to Nanyah Vegas, LLC's Motion to Continue Trial and to Set Firm Trial Date on OST	5/10/18	8	JA_001783-1790

Defendants Sigmund	4/11/18	6-7	JA_001479-1501
Rogich, Individually and as			
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Countermotion for Summary			1
Judgment and for NRCP			
56(f) Relief			
Defendants Sigmund	9/20/18	14	JA_003369-3379
Rogich, Individually and as			:
Trustee of the Rogich			
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	2/22/10	2.5	14 000040 0070
_	3/22/19	25	JA_006040-6078
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Imitations, LLC's 2 <sup>nd</sup>			
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	Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations LLC's Reply in Support of Motion for Summary Judgment and Opposition to Nanyah Vegas, LLC's Countermotion for Summary Judgment and for NRCP 56(f) Relief  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Reply in Support of Their Motion for Rehearing  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's 2 <sup>nd</sup> Supplemental Pre-Trial disclosures  Eldorado Hills, LLC's Notice of Non-Consent to Nanyah Vegas, LLC's Unpleaded Implied-in-fact Contract Theory  Eldorado Hills, LLC's Notice of Cross-Appeal	Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations LLC's Reply in Support of Motion for Summary Judgment and Opposition to Nanyah Vegas, LLC's Countermotion for Summary Judgment and for NRCP 56(f) Relief  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Reply in Support of Their Motion for Rehearing  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's 2nd Supplemental Pre-Trial disclosures  Eldorado Hills, LLC's Unpleaded Implied-in-fact Contract Theory  Eldorado Hills, LLC's Notice of Cross-Appeal  Eldorado Hills, LLC's 4/16/19	Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations LLC's Reply in Support of Motion for Summary Judgment and Opposition to Nanyah Vegas, LLC's Countermotion for Summary Judgment and for NRCP 56(f) Relief  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Reply in Support of Their Motion for Rehearing  Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's 2nd Supplemental Pre-Trial disclosures  Eldorado Hills, LLC's Unpleaded Implied-in-fact Contract Theory  Eldorado Hills, LLC's Notice of Cross-Appeal  Eldorado Hills, LLC's 4/16/19 29

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1	Nanyah Vegas, Li
2	Emergency Motio
3	Address Defendar Rogich Family Iri
4	Trust's NRS 163.
	and/or Motion to
5	Trial for Purposes
6	163.120
7	Nanyah Vegas, L
8	Motion in Limine Defendants Bound
9	Answers to Comp
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10	Motion in Limine
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17	Nanyah Vegas, L
18	Motion to Extend
19	Dispositive Motion
	and Motion for S Judgment
20	Nanyah Vegas, L
21	Motion to Retax
22	Submitted by Eld
23	Hills, LLC, Peter
24	Individually and a of The Eliades Su
25	Trust of 10/30/08
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26	Costs and Disbur

Nanyah Vegas, LLC's Emergency Motion to Address Defendant The Rogich Family Irrevocable Trust's NRS 163.120 Notice and/or Motion to Continue Trial for Purposes of NRS 163.120	4/16/19	28	JA_006718-6762
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Nanyah Vegas, LLC's Motion to Retax Costs Submitted by Eldorado Hills, LLC, Peter Eliades, Individually and as Trustee of The Eliades Survivor Trust of 10/30/08, and Teld, LLC's Memorandum of Costs and Disbursements	10/16/19	35	JA_008423-8448

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Nanyah Vegas, LLC's Motion to Retax Costs Submitted by Sigmund Rogich, Individually and as Trustee of the Rogich Family Revocable Trust, and Imitations, LLC's Memorandum of Costs and Disbursements Pursuant to NRS 18.005 and NRS 18.110	10/16/19	35	JA_008449-8457
Nanyah Vegas, LLC's Motion to Settle Jury Instructions Base Upon the Court's October 5, 2018 Order Granting Summary Judgment	2/26/19	21	JA_005138-5174
Nanyah Vegas, LLC's Notice of Compliance with 4-9-2019 Order	4/16/19	29	JA_007052-7061
Nanyah Vegas, LLC's Opposition to Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC's Motion for Reconsideration and Joinder	6/25/18	13	JA_003053-3076
Nanyah Vegas, LLC's Opposition to Eldorado Hills, LLC's Motion for Dismissal with Prejudice Under Rule 41(e)	8/6/19	33	JA_007959-8006

1 2	Nanyah Vegas, LLC's Opposition to Eldorado	7/11/19	32	JA_007840-7867
3	Hills, LLC's Motion for Summary Judgment			
4	Nanyah Vegas LLC's	2/15/19	17	JA 004040-4070
5	Opposition to Eldorado Hills LLC's Motion to Extend the			<del>-</del>
6	Dispositive Motion Deadline			
7	and Motion for Summary Judgment and			
8	Countermotion for NRCP 15 Relief			
10	Nanyah Vegas, LLC's Opposition to Motion for	9/4/18	14	JA_003317-3351
11	Rehearing and			
12	Countermotion for Award of Fees and Costs			
13	Nanyah Vegas LLC's	2/15/19	17	JA_004071-4114
14	Opposition to Motion for Relief From the October 5,			
15 16	2018 Order Pursuant to NRCP 60(b)			
17	Nanyah Vegas, LLC's	9/24/18	14	JA_003380-3386
18	Opposition to Motion in Limine to Preclude any			
19	Evidence or Argument			
20	Regarding an Alleged Implied-in-Fact Contract			
21	Between Eldorado Hills,			
22	LLC and Nanyah Vegas, LLC			
23	Nanyah Vegas, LLC's	1/8/2020	37	JA_009001-9008
24	Opposition to Peter Eliades and Teld, LLC's Motion for			
25	Attorneys' Fees and Costs			
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Nanyah Vegas, LLC's Opposition to Rogich Defendants' Motion for Attorneys' Fees and Costs	1/8/2020	37	JA_009009-9018
Nanyah Vegas, LLC's Opposition to Rogich Defendant's Motion for Summary Judgment	3/20/19	25	JA_005992-6037
Nanyah Vegas, LLC's Opposition to Rogich Defendants' Motion in Limine re: Carlos Huerta	3/20/19	24	JA_005836-5907
Nanyah Vegas, LLC's Opposition to Rogich Defendants' Motion in Limine to Preclude the Altered Eldorado Hill's Ledger and Related Testimony at Trial	3/20/19	25	JA_005908-5991
Nanyah Vegas, LLC's Opposition to Rogich Defendant's Motion to Compel	3/14/19	23	JA_005631-5651
Nanyah Vegas, LLC's Pretrial Disclosures	10/12/18	14	JA_003428-3439
Nanyah Vegas, LLC's Pretrial Memorandum	4/16/19	28	JA_006763-6892
Nanyah Vegas, LLC's Reply in Support of Motion in Limine #5 re: Parol Evidence Rule	3/14/19	23	JA_005652-5671
Nanyah Vegas, LLC's Reply in Support of Motion in Limine #6 re: Date of Discovery	3/14/19	23	JA_005672-5684

Nanyah Vegas, LLC's Reply in Support of Motion to Continue Trial and to set Firm Trial Date	5/15/18	8	JA_001826-1829
Nanyah Vegas, LLC's Reply in Support of Motion to Retax Costs submitted by Eldorado Hills, LLC, Peter Eliades, Individually and as Trustee of the Eliades survivor Trust of 10/30/08, and Teld, LLC's Memorandum of Costs and Disbursements	1/23/2020	37	JA_009033-9040
Nanyah Vegas, LLC's Reply in Support of its Motion to Retax Costs Submitted by Sigmund Rogich, Individually and as Trustee of the Rogich Family Revocable Trust, and Imitations, LLC's Memorandum of Costs and Disbursements Pursuant to NRS 18.005 and NRS 18.110	1/23/2020	37	JA_009041-9045
Nanyah Vegas, LLC's Reply in Support of Motion to Settle Jury Instructions Based Upon the Court's October 5, 2018, Order Granting Summary Judgment	3/27/19	25	JA_006114-6134

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3	Limine #3 re: De Bound by Their A
4	Complaint
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13	Attorneys' Fees a
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16	Defendants' Mot
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18	Nanyah Vegas, L Supplemental Pro
19	Disclosures
20	Nevada Supreme Clerks Certificate
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22	Rehearing Denie
23	Nevada Supreme Clerk's Certifica
24	- Affirmed
25	Notice of Appeal
26	Notice of Appeal

Nanyah Vegas, LLC's Reply to Oppositions to Motion in Limine #3 re: Defendants Bound by Their Answers to Complaint	10/3/18	14	JA_003397-3402
Nanyah Vegas, LLC's Supplement to Its Emergency Motion to Address Defendant the Rogich Trust's NRS 163.120 Notice and/or Motion to Continue Trial for Purposes of NRS 163.120	4/21/19	29	JA_007119-7133
Nanyah Vegas, LLC's Supplement to its Opposition to Peter Eliades and Teld, LLC's Motion for Attorneys' Fees and Costs	3/19/2020	38	JA_009120-9127
Nanyah Vegas, LLC's Supplement to Its Opposition to Rogich Defendants' Motion for Attorneys' Fees and Costs	3/19/2020	38	JA_009128-9226
Nanyah Vegas, LLC's Supplemental Pretrial Disclosures	10/31/18	14	JA_003440-3453
Nevada Supreme Court Clerks Certificate/Judgment - Reversed and Remand; Rehearing Denied	4/29/16	4	JA_000768-776
Nevada Supreme Court Clerk's Certificate Judgment – Affirmed	7/31/17	4	JA_000862-870
Notice of Appeal	10/24/19	36	JA_008750-8819
Notice of Appeal	4/14/2020	38	JA_009229-9231

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Notice of Appeal	5/21/2020	38	JA_009283-9304
Notice of Consolidation	4/5/17	4	JA_000822-830
Notice of Cross-Appeal	11/7/19	37	JA_008921-8937
Notice of Entry of Decision and Order	10/4/19	33	JA_008063-8072
Notice of Entry of Judgment	5/6/2020	38	JA_009264-9268
Notice of Entry of Order	10/8/18	14	JA_003413-3427
Notice of Entry of Order	3/26/19	25	JA_006108-6113
Notice of Entry of Order	4/17/19	29	JA_007073-7079
Notice of Entry of Order	4/30/19	30	JA_007169-7173
Notice of Entry of Order	5/1/19	30	JA_007202-7208
Notice of Entry of Order	5/1/19	30	JA_007209-7215
Notice of Entry of Order	6/24/19	32	JA_007828-7833
Notice of Entry of Order	6/24/19	32	JA_007834-7839
Notice of Entry of Order	2/3/2020	37	JA_009061-9068
Notice of Entry of Order	4/28/2020	38	JA_009235-9242
Notice of Entry of Order	5/7/2020	38	JA_009269-9277
Notice of Entry of Order (sic)	5/7/2020	38	JA_009278-9282
Notice of Entry of Order Denying Motion for Reconsideration	7/26/18	13	JA_003192-3197
Notice of Entry of Order Denying Nanyah Vegas, LLC's Motion for Reconsideration	8/13/18	13	JA_003200-3204
Notice of Entry of Order Denying Nanyah Vegas, LLC's Motion in Limine #5: Parol Evidence Rule	4/10/19	27	JA_006478-6483

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Notice of Entry of Order Denying the Rogich Defendants' Motions in Limine	5/7/19	30	JA_007229-7236
Notice of Entry of Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorneys' Fees and Setting Supplemental Briefing on Apportionment	3/16/2020	38	JA_009113-9119
Notice of Entry of Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees	5/6/2020	38	JA_009257-9263
Notice of Entry of Order Regarding Motions in Limine	11/6/18	14	JA_003462-3468
Notice of Entry of Stipulation and Order Suspending Jury Trial	5/16/19	31	JA_007603-7609
Notice of Entry of Orders	5/22/18	8	JA_001837-1849
Objection to Nanyah's Request for Judicial Notice and Application of the Law of the Case Doctrine	4/19/19	29	JA_007106-7113
Objections to Eldorado Hills, LLC's Pre-Trial Disclosures	4/5/19	27	JA_006434-6440
Objections to Nanyah Vegas, LLC's Pre-trial Disclosures	4/5/19	27	JA_006423-6433

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Opposition to Eldorado Hill's Motion for Summary Judgment and Countermotion for Summary Judgment	6/19/18	12	JA_002917-2951
Opposition to Eliades Defendants' Motion for Summary Judgment and Countermotion for Summary Judgment	6/19/18	11-12	JA_002573-2916
Opposition to Motion for Summary Judgment; Countermotion for Summary Judgment; and Countermotion for NRCP 56(f) Relief	3/19/18	6	JA_001265-1478
Opposition to Motion for Summary Judgment or Alternatively for Judgment as a Matter of Law Pursuant to NRCP 50(a)	5/24/19	32	JA_007773-7817
Opposition to Nanyah Vegas, LLC's Motion in Limine #5 re: Parol Evidence Rule	3/8/19	22-23	JA_005444-5617
Opposition to Nanyah Vegas, LLC's Motion in Limine #6 re: Date of Discovery	3/8/19	22	JA_005263-5443
Opposition to Nanyah Vegas, LLC's Motion to Retax Costs Submitted by Rogich Defendants	1/9/2020	37	JA_009019-9022

1 2 3 4 5 6	Opposition to Plaintiff's Emergency Motion to Address Defendant The Rogich Family Irrevocable Trust's NRS 163.120 Notice and/or Motion to Continue Trial for Purposes of NRS 163.120	4/18/19	29	JA_007093-7103
7 8 9	Opposition to Plaintiff's Motion to Reconsider Order on Motion in Limine #5 re Parol Evidence Rule on OST	4/5/19	26	JA_006189-6402
10	Order	4/30/19	30	JA_007165-7168
11	Order: (1) Granting Defendants Peter Eliades, Individually and as Trustee of the Eliades Survivor Trust of 10/30/08, and Teld, LLC's Motion for Summary Judgment; and (2) Denying Nanyah Vegas, LLC's Countermotion for Summary Judgment	10/5/18	14	JA_003403-3412
18 19 20 21 22	Order: (1) Granting Rogich Defendants' Renewed Motion for Attorneys' Fees and Costs; and (2) Denying Nanyah's Motion to Retax Costs Submitted by Rogich Defendants	5/5/2020	38	JA_009249-9254
23 24 25	Order Denying Countermotion for Summary Judgment and Denying NRCP 56(f) Relief	5/22/18	8	JA_001830-1832

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Order Denying Motion to Continue Trial Date and Granting Firm Trial Date Setting	6/4/18	11	JA_002508-2511
Order Denying Motion to Reconsider	7/24/18	13	JA_003190-3191
Order Denying Nanyah Vegas, LLC's Motion for NRCP 15 Relief	5/29/19	32	JA_007818-7820
Order Denying Nanyah Vegas, LLC's Motion for Reconsideration	8/10/18	13	JA_003198-3199
Order Denying Nanyah Vegas, LLC's Motion in Limine #5: Parol Evidence Rule	4/10/19	27	JA_006475-6477
Order Denying Nanyah Vegas, LLC's Motion in Limine #6 re: Date of Discovery	4/17/19	29	JA_007069-7072
Order Denying Plaintiff Nanyah Vegas, LLC's Motion to Settle Jury Instructions	5/1/19	30	JA_007174-7177
Order Denying Nanyah Vegas, LLC's Motion to Reconsider Order on Motion in Limine #5 re: Parol Evidence Rule	5/1/19	30	JA_007178-7181
Order Denying the Rogich Defendants' Motions in Limine	5/6/19	30	JA_007216-7218
Order Denying The Rogich Defendants' NRCP 60(b) Motion	3/26/19	25	JA_006105-6107

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Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees	5/4/2020	38	JA_009243-9246
Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees and Setting Supplemental Briefing on Apportionment	3/16/2020	38	JA_009109-9112
Order Granting Motion for Award of Attorneys Fees	2/10/15	4	JA_000765-767
Order Granting Motion for Leave to Amend Answer to Complaint	1/29/18	4	JA_000884-885
Order Granting Partial Summary Judgment	10/1/14	3	JA_000691-693
Order Granting Partial Summary Judgment	11/5/14	3	JA_000694-698
Order Partially Granting Summary Judgment	5/22/18	8	JA_001833-1836
Order Regarding Motions in Limine	11/6/18	14	JA_003458-3461
Order Regarding Plaintiff's Emergency Motion to Address Defendant The Rogich Family Irrevocable Trust's NRS 163.120 Notice and/or Motion to Continue Trial for Purposes of NRS 163.120	5/29/19	32	JA_007821-7823
Order Re-Setting Civil Jury Trial and Calendar Call	12/7/18	14	JA_003469-3470
Order Re-Setting Civil Jury Trial and Calendar Call	12/19/18	14	JA_003471-3472

Order Setting Civil Jury Trial, Pre-Trial, and Calendar Call	6/6/18	11	JA_002551-2552
Partial Transcript of Proceedings, All Pending Motions (Excludes Ruling), Heard on April 18, 2018	4/23/18	7-8	JA_001718-1758
Partial Transcript of Proceedings, All Pending Motions (Ruling Only), Hearing on April 18, 2018	4/19/18	7	JA_001712-1717
Plaintiffs' Opposition to Defendant's Motion for Award of Attorneys' Fees	12/5/14	4	JA_000745-758
Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment and Counter-Motion for Partial Summary Judgment	8/25/14	3	JA_000518-664
Pretrial Memorandum	4/16/19	27-28	JA_006501-6717
Proof of Service (Eldorado Hills)	8/30/13	1	JA_000022-24
Proof of Service (Sig Rogich aka Sigmund Rogich)	9/18/13	1	JA_000025-26
Recorders Transcript of Hearing – Calendar Call, Heard on November 1, 2018	12/9/19	37	JA_008938-8947
Recorders Transcript of Hearing – Recorder's Transcript of Proceedings re: Motions, Heard on September 5, 2019	9/9/19	33	JA_008027-8053

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Recorders Transcript of Hearing – Telephonic Conference, Heard on November 5, 2018	12/9/19	37	JA_008948-8955
Recorders Transcript of Hearing – Transcript of Proceedings, Telephonic Conference, Heard on April 18, 2019	5/1/19	30	JA_007182-7201
Recorders Transcript of Proceedings – All Pending Motions, Heard on April 8, 2019	12/9/19	37	JA_008956-9000
Reply in Support of Defendant Eldorado Hills, LLC's Motion for Dismissal With Prejudice Under Rule 41(e)	8/29/19	33	JA_008015-8024
Reply in Support of Defendant Eldorado Hills, LLC's Motion for Summary Judgment	8/29/19	33	JA_008007-8014
Reply in Support of Defendant Eldorado Hills, LLC's Motion in Limine to Preclude Any Evidence or Argument Regarding an Alleged Implied-In-Fact Contract Between Eldorado Hills, LLC and Nanyah Vegas, LLC	10/3/18	14	JA_003391-3396
Reply in Support of Motion for Summary Judgment or Alternatively for Judgment as a Matter of Law Pursuant to NRCP 50(a)	7/24/19	33	JA_007943-7958

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Reply in Support of Defendants' Motion in Limine to Preclude the Altered Eldorado Hills' General Ledger and Related Testimony at Trial	3/28/19	25	JA_006135-6154
Reply in Support of Defendants Peter Eliades and Teld, LLC's Motion for Attorneys' Fees	1/23/2020	37	JA_009023-9032
Reply in Support of Defendants Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations LLC's Motion for Reconsideration	7/2/18	13	JA_003077-3082
Reply in Support of Motion for Relief From the October 5, 2018 Order Pursuant to NRFP 60(b)	2/19/19	19-20	JA_004583-4789
Reply in Support of Motion to Compel Production of Plaintiff's Tax Returns	3/18/19	23-24	JA_005685-5792
Reply in Support of Motion to Reconsider Order on Nanyah's Motion in Limine #5; Parol Evidence Rule on Order Shortening Time	4/5/19	27	JA_006403-6409
Reply in Support of Motion to Reconsider Order Partially Granting Summary Judgment	6/25/18	13	JA_003018-3052

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Reply to Opposition to Countermotion for Summary Judgment; and Countermotion for NRCP 56(f) Relief	4/16/18	7	JA_001689-1706
Reply to Opposition to Motion for Partial Summary Judgment	9/18/14	3	JA_000676-690
Request for Judicial Notice	4/15/19	27	JA_006497-6500
Request for Judicial Notice and Application of the Law of the Case Doctrine	4/17/19	29	JA_007080-7092
Rogich Defendants' Opposition to Plaintiff's Motion to Settle Jury Instructions	3/20/19	24	JA_005819-5835
Rogich Defendants' Renewed Motion for Attorneys' Fees and Costs	10/22/19	36	JA_008628-8749
Rogich Defendants' Reply in Support of Motion in Limine to Preclude Contrary Evidence as to Mr. Huerta's Taking of \$1.42 Million from Eldorado Hills, LLC as Consulting Fee Income	3/28/19	26	JA_006155-6167
Rogich Defendants' Reply in Support of Their Renewed Motion for Attorneys' Fees and Costs	1/23/2020	37	JA_009046-9055

1	Sigmund Rogich,	4/9/19	27	JA 006457-6459
2	Individually and as a Trustee			_
3	of the Rogich Family			
	Irrevocable Trust and Imitations, LLC's Joinder to			
4	Eldorado Hills, LLC's			
5	Notice of Non-Consent to			
6	Nanyah Vegas, LLC's			
7	Unpleaded Implied-in-fact Contract Theory			
		4/40/40		X1 0061 <b>-0</b> 61-1
8	Sigmund Rogich, Individually and as Trustee	4/10/19	27	JA_006472-6474
9	of the Rogich Family			
10	Irrevocable Trust and			<b>,</b>
11	Imitations, LLC's Joinder to			
12	Eldorado Hills, LLC's			
	Objections to Nanyah Vegas, LLC's 2 <sup>nd</sup>			1
13	Supplemental Pre-Trial			
14	Disclosures			
15	Sigmund Rogich,	3/8/18	6	JA_001262-1264
16	Individually and as Trustee			
17	of the Rogich Family Irrevocable Trust and			
17	Imitations LLC's Joinder to			
18	Defendants Peter Eliades			
19	Individually and as Trustee			
20	of the Eliades Trust of			
21	10/30/08 Eldorado Hills LLC and Teld's Joinder to			
	Motion for Summary			
22	Judgment			
23				
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1	Sigmund Rogich,	4/17/18	7	JA_001707-1709
2	Individually and as Trustee			_
3	of the Rogich Family			
3	Irrevocable Trust and			
4	Imitations LLC's Joinder to Defendants Peter Eliades,			
5	Individually and as Trustee			
6	of The Eliades Survivor			
	Trust of 10/30/08, Eldorado			
7	Hills, LLC and Teld's Reply			
8	in Support of Their Joinder to motion for Summary			
9	Judgment and Opposition to			
10	Nanyah Vegas, LLC's			
	Countermotion for Summary			
11	Judgment and NRCP 56(f)			
12	Relief			
13	Stipulation and Order	4/22/2020	38	JA_009232-9234
14	Stipulation and Order	5/16/19	31	JA_007599-7602
	Suspending Jury Trial			
15	Stipulation and Order re:	1/30/2020	37	JA_009056-9058
16	October 4, 2019 Decision			
17	Stipulation and Order	6/13/19	32	JA_007824-7827
18	Regarding Rogich Family Irrevocable Trust's			
19	Memorandum of Costs and			
	Motion for Attorneys' Fees			
20	Stipulation for Consolidation	3/31/17	4	JA 000818-821
21	Substitution of Attorneys	1/24/18	4	JA 000881-883
22	Substitution of Attorneys	1/31/18	4	JA 000886-889
23				
24	Substitution of Counsel	2/21/18	4	JA_000890-893
	Summons – Civil	12/16/16	4	JA_000803-805
25	(Imitations, LLC)			
26	Summons – Civil (Peter	12/16/16	4	JA_000806-809
	Eliades)			

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Summons – Civil (The Eliades Survivor Trust of 10/30/08)	12/16/16	4	JA_000810-813
Summons – Civil (The Rogich Family Irrevocable Trust)	12/16/16	4	JA_000799-802
Summons – Sigmund Rogich	12/22/16	4	JA_000814-817
Summons – Teld, LLC	12/16/16	4	JA_000796-798
The Rogich Defendants' Memorandum of Points and Authorities Regarding Limits of Judicial Discretion Regarding Notice Requirements Provided to Trust Beneficiaries Under NRS Chapter 163	4/21/19	30	JA_007134-7145
Transcript of Proceedings, Jury Trial, Hearing on April 22, 2019	4/23/19	30	JA_007148-7164
Transcript of Proceedings, Motions, Hearing January 30, 2020	2/12/2020	37	JA_009069-9097

## **CERTIFICATE OF SERVICE**

Pursuant to NRAP 25, I certify that I am an employee of SIMONS HALL JOHNSTON PC, and that on this date I caused to be served a true copy of the **JOINT APPENDIX VOL. 38** on all parties to this action by the method(s) indicated below:

X by using the Supreme Court Electronic Filing System:

Brenoch Wirthlin
Kolesar & Leatham
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Las Vegas, NV 89145
Attorneys for Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust and Imitations, LLC

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Dennis Kennedy
Bailey Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
Attorneys for Eldorado Hills, LLC, Teld, LLC, a Nevada limited
liability company; Peter Eliades, individually and as Trustee of the
The Eliades Survivor Trust of 10/30/08

DATED: This \_\_\_\_\_ day of July, 2021.

JODI ALHASAN

Electronically Filed 2/21/2020 12:02 PM Steven D. Grierson CLERK OF THE COURT

1 DECL (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY & KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 DISTRICT COURT 10 CLARK COUNTY, NEVADA 11 BAILEY KENNEDY 8984 SPANISH KIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 CARLOS A. HUERTA, an individual; 12 CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada 14 Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company, 15 Plaintiffs, VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited 21 liability company, 22. Plaintiff, VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants.

Case No. A-13-686303-C Dept. No. XXVII

DECLARATION OF JOSEPH A. LIEBMAN IN FURTHER SUPPORT OF DEFENDANTS PETER ELIADES AND TELD, LLC'S MOTION FOR ATTORNEY'S FEES

#### **CONSOLIDATED WITH:**

Case No. A-16-746239-C

Page 1 of 6

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# DECLARATION OF JOSEPH A. LIEBMAN IN FURTHER SUPPORT OF DEFENDANTS PETER ELIADES AND TELD, LLC'S MOTION FOR ATTORNEY'S FEES

I, Joseph A. Liebman, declare as follows:

- 1. I am over eighteen (18) years of age and a resident of Clark County, Nevada. I am a Partner with the law firm of Bailey Kennedy, LLP (the "Firm"). I am counsel for Defendants Peter Eliades ("Eliades") and Teld, LLC ("Teld") in the above-captioned consolidated action. I am also counsel for Eldorado Hills, LLC ("Eldorado Hills") and The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"). I have personal knowledge of and am competent to testify to the facts contained in this Declaration. I make this Declaration in support of Defendants Peter Eliades and Teld, LLC's Motion for an Award of Attorneys' Fees (the "Motion").
- 2. On January 30, 2020, the Court granted the Motion, finding that Eliades and Teld were the prevailing parties against Nanyah Vegas, LLC ("Nanyah") and therefore contractually entitled to reimbursement of their reasonable attorney's fees from Nanyah under Section 9(d) of the Membership Interest Purchase Agreement.
- 3. Because the Firm also represents Eldorado Hills and the Eliades Trust in this consolidated action, the Court also ordered supplemental briefing in the form of a declaration from undersigned counsel on the issue of apportionment. Specifically, the Court requested supplemental information regarding the Firm's attempts to apportion and/or remove any attorney's fees incurred on behalf of Eldorado Hills and/or the Eliades Trust—two non-parties to the Membership Interest Purchase Agreement.
- 4. Eliades initially retained the Firm on or around November of 2017 in this consolidated matter on behalf of himself individually as well as on behalf of all of his wholly owned entities, including Teld, Eldorado, and the Eliades Trust. The Firm was retained to provide a joint unified defense on behalf of all four clients (collectively, the "Eliades Defendants").
- 5. Although some of the claims for relief asserted against the Eliades Defendants varied, the primary theory of liability against the Eliades Defendants was constant—Nanyah was entitled to reimbursement of a \$1,500,000.00 alleged investment in Eldorado Hills. Teld and the Eliades Trust are both members of Eldorado Hills, and Eliades is the owner of those respective

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entities. Thus, their interests were (and are) aligned in defending this case against Nanyah.

- 6. Accordingly, during the time period that all four of the Eliades Defendants were parties to this consolidated action, the vast majority of the work was performed on behalf of all four, providing for a joint unified defense.
- 7. In preparation for the Motion, undersigned counsel went through all of the Eliades Defendants' invoices and attempted to remove any entries that were discrete tasks specific to Eldorado Hills and/or the Eliades Trust.
- 8. Although undersigned counsel did not locate any discrete tasks relating to the Eliades Trust, it did locate discrete tasks for Eldorado Hills. For example, on June 1, 2018, the Firm filed a Motion for Summary Judgment solely on behalf of Eldorado Hills.<sup>1</sup>
- 9. Undersigned counsel ensured that all discrete billing entries relating to Eldorado Hills' Motion for Summary Judgment were removed and were not included with the Motion.
- 10. All in all, the Firm removed eighteen separate billing entries that were specific to Eldorado Hills. These eighteen billing entries that were removed from the Motion comprised 56.25 hours of billable time and \$18,752.50 in attorney's fees, thereby reducing the attorney's fees sought from \$234,988.75 to \$216,236.25.
- 11. With respect to the time period when the Firm was defending all four of the Eliades Defendants, the remainder of the billing entries were all in furtherance of their joint unified defense. Included below are several examples of these time entries.
  - "Review/analyze case file (including, but not limited to, all of the prior case filings in the two litigations) to get up to speed on the case."<sup>2</sup>
  - "Review/analyze deposition of Carlos Huerta and Yoav Harlap."<sup>3</sup>
  - "Attend hearing on discovery motions."4
  - "Review/analyze filed documents in Antonio Nevada case for relevance to

Def. Eldorado Hills, LLC's Motion for Summary Judgment, filed June 1, 2018. 26

Ex. 4 to Defendants Peter Eliades and Teld, LLC's Motion for an Award of Attorneys' Fees, p. 7 of 43.

Id., p. 8 of 43.

Id., p. 9 of 43.

28 15 Id.

Id., p. 32 of 43.

Nanyah case."5 1 "Review/analyze discovery documents produced by Sam Lionel." 2 "Review/analyze Rogich deposition transcript."7 3 "Review/analyze various operating agreements for Eldorado for information 4 relevant to pending Motion for Summary Judgment."8 5 h. "Draft Reply in Support of Joinder to Motion for Summary Judgment and 6 Opposition to Countermotion for Summary Judgment."9 7 "Legal research regarding intracorporate conspiracy doctrine." <sup>10</sup> 8 "Review/analyze potential exhibits for trial.11" 9 "Attend deposition of Melissa Olivas." 12 10 "Attend hearing regarding Motion to Continue Trial." <sup>13</sup> 11 "Draft memorandum for Pete's deposition preparation." 14 12 n. "Attend Sig Rogich deposition." 15 13 12. All of these time entries were in furtherance of all four Eliades Defendants' joint 14 15 unified defense. There is no practicable way to apportion these types of tasks between all four of the Eliades Defendants. Therefore, under the principles set forth in Mayfield v. Koroghli, 124 Nev. 16 343, 353, 184 P.3d 362, 369 (2008) and Abdallah v. United Savings Bank, 51 Cal. Rptr. 2d 286, 293 17 (Cal. Ct. App. 1996), it would be impracticable to further apportion attorney's fees among the four 18 19 Eliades Defendants. 20 Id., p. 13 of 43. 21 Id. 22 Id., p. 15 of 43. Id., p. 19 of 43. 23 Id., p. 21 of 43. 24 Id., p. 25 of 43. 25 Id., p. 27 of 43. Id., p. 28 of 43. 26 13 Id., p. 31 of 43. 27

Page 4 of 6

13. This Court has presided over these consolidated matters for a long time. It is well
aware of the interrelatedness among the parties and the claims for relief. The entire litigation was
based on the solitary premise that Nanyah is supposedly entitled to reimbursement of its alleged
\$1,500,000 investment in Eldorado Hills. Nanyah continuously pointed to various language in the
MIPA to try to prove its claims. Nanyah asserted many claims under the MIPA, some claims
outside the MIPA, and some claims against non-parties to the MIPA. Regardless, all of the issues
and claims are so interrelated and intermingled that it would be nearly impossible to apportion
attorney's fees for certain claims and certain parties.
14. Furthermore, the Motion did not include any attorney's fees incurred at the Firm
following September 13, 2018 because Teld and Eliades (and the Eliades Trust) were formally
dismissed from this action on October 5, 2018. All attorney's fees incurred from that point
forward were solely incurred by Eldorado Hills and thus were not reimbursable under Section 9(d).

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

EXECUTED on this 21st day of February, 2020.

JOSEPH A. LIEBMAN, ESQ.

Order: (1) Granting Defendants' Peter Eliades, Individually and as Trustee of the Eliades Survivor Trust of 10/30/08, and Teld, LLC's Motion for Summary Judgment; and (2) Denying Nanyah Vegas, LLC's Countermotion for Summary Judgment, filed Oct. 5, 2018.

# BAILEY \* KENNEDY 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820

1	<u>CERTIFICATE OF SERVICE</u>					
2	I certify that I am an employee of BAILEY❖KENNEDY and that on the 21 <sup>st</sup> day of					
3	February, 2020, service of the foregoing <b>DECLARATION OF JOSEPH A. LIEBMAN IN</b>					
4	FURTHER SUPPORT OF DEFENDANTS PETER ELIADES AND TELD, LLC'S MOTION					
5	FOR ATTORNEY'S FEES was made by mandatory electronic service through the Eighth Judicial					
6	District Court's electronic filing system and/or by depositing a true and correct copy in the U.S.					
7	Mail, first class postage prepaid, and addressed to the following at their last known address:					
8	MARK G. SIMONS, ESQ. Email: msimons@shjnevada.com SIMONS HALL JOHNSTON PC					
9	6490 S. McCarran Blvd., Suite F-46 Reno, NV 89509  Attorneys for Plaintiff NANYAH VEGAS, LLC					
10	THOMAS FELL, ESQ. Email: slionel@fclaw.com					
11	FENNEMORE CRAIG, P.C. 300 S. Fourth Street, Suite 1400  Attorneys for Defendant SIG POCICIL also SIGMIND					
<ul><li>12</li><li>13</li></ul>	Las Vegas, NV 89101 SIG RÓGICH aka SIGMUND ROGICH, Individually and as Trustee of THE ROGICH FAMILY					
14	IRREVOCABLE TRUST, and IMITATIONS, LLC					
15	Brenoch Wirthlin, Esq. bwirthlin@klnevada.com <b>KOLESAR &amp; LEATHAM</b>					
16 17 18 19	400 South Rampart Blvd., Suite 400 Las Vegas, NV 89145  SIG ROGICH aka SIGMUND ROGICH, Individually and as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST, and IMITATIONS, LLC					
20	MICHAEL V. CRISTALLI Email: mcristalli@gcmaslaw.com JANIECE S. MARSHALL jmarshall@gcmaslaw.com GENTILE CRISTALLI MILLER					
<ul><li>21</li><li>22</li><li>23</li></ul>	ARMENI SAVARESE  410 South Rampart Blvd., Suite 420 Las Vegas, NV 89145  Attorneys for Defendants SIG ROGICH aka SIGMUND ROGICH as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST					
<ul><li>24</li><li>25</li><li>26</li><li>27</li><li>28</li></ul>	<u>/s/ Sharon L. Murnane</u> Employee of BAILEY <b>❖</b> KENNEDY					

Page 6 of 6

**Electronically Filed** 2/28/2020 4:58 PM Steven D. Grierson CLERK OF THE COURT **HUTCHISON & STEFFEN, PLLC** Brenoch Wirthlin, Esq. (NV Bar No. 10282) 2 10080 W. Alta Drive, Suite 200 Las Vegas, Nevada 89145 3 Telephone: (702) 385-2500 Facsimile: (702) 385-2086 4 Email: bwirthlin@hutchlegal.com 5 Attorneys for Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust, 6 and Imitations, LLC 7 IN THE EIGHTH JUDICIAL DISTRICT OF 8 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 9 CARLOS A. HUERTA, an individual; CARLOS A. Case No.: A-13-686303-C HUERTA as Trustee of THE ALEXANDER 10 CHRISTOPHER TRUST, a Trust established in Dept. No.: XXVII Nevada as assignee of interests of GO GLOBAL, 11 INC., a Nevada corporation; NANYAH VEGAS, **Consolidated With:** LLC A Nevada limited liability company, 12 Case No.: A-16-746239-C Plaintiffs, 13 v. 14 SIG ROGICH aka SIGMUND ROGICH as Trustee 15 DECLARATION OF BRENOCH The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited WIRTHLIN IN FURTHER SUPPORT 16 liability company; DOES I-X; and/or ROE OF ROGICH DEFENDANTS' CORPORATIONS I-X, inclusive, MOTION FOR ATTORNEYS' FEES 17 Defendants. 18 19 NANYAH VEGAS, LLC, a Nevada limited liability company, 20 Plaintiff, 21 TELD, LLC, a Nevada limited liability company, 22 PETER ELIADES, individually and as Trustee of Eliades Survivor Trust of 10/30/08; 23 SIGMUND ROGICH, individually and as Trustee The Rogich Family Irrevocable 24 IMITATIONS, LLC, a Nevada limited liability DOES I-X; and/or ROE company; 25 CORPORATIONS I-X, inclusive, 26 Defendants. 27

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I, Brenoch Wirthlin, declare as follows:

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1. I am a partner with the law firm of Hutchison & Steffen and formerly a director at the law firm of Fennemore Craig, P.C.

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Trustee of The Rogich Family Irrevocable Trust ("Rogich Trust"), and IMITATIONS, LLC ("Imitations" and collectively with Rogich and the Rogich Trust referred to herein as the "Rogich

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Defendants").

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this Declaration. 11

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- 2. I am counsel for Defendants SIGMUND ROGICH, individually ("Rogich") and as
- 3. I have personal knowledge of and am competent to testify to the facts contained in
- 4. I make this Declaration in support of the Rogich Defendants' Motion for Attorneys' Fees (the "Motion") as ordered by the Court at the
- 5. On January 30, 2020, the Court granted the Motion finding that the Rogich Defendants were the prevailing parties against Nanyah Vegas, LLC and were, therefore, entitled to their attorneys' fees incurred after the service of the Offer of Judgment.
- 6. As requested by the Court, this Declaration shall address the redactions and block billings provided for with the Motion.
- At the hearing ("Hearing") on the Motion, the Court only awarded fees from the 7. date of the Offer of Judgment.
- 8. Since service of the Offer of Judgment on October 29, 2018, the Rogich Defendants have incurred a total attorneys' fees of \$541,021.50 from the date of the Offer of Judgment. See Redacted Billing History, attached as Exhibit 6 to the Motion. This is the amount of fees awarded to the Rogich Defendants at the Hearing.
- 9. Since the Hearing on the Motion, as directed by the Court, I have reviewed the time entries again from the date of the Offer of Judgment, including the unredacted version of the Redacted Billing History.
  - 10. The Redacted Billing History includes time entries after October 29, 2018 and

only includes the final Motion for Summary Judgment.

- 11. Therefore, there was no fee award for prior motions for summary judgment.
- 12. Further, the billing entries from the date of the Offer of Judgment do not include duplicative time entries. Rather, they include time entries for reasonable services, including without limitation the following:
  - Filing multiple necessary motions, including a rule 60(b) motion, motions in limine;
  - Necessary legal research of multiple issues;
  - Preparation of documents and other matters related to trial;
  - Numerous briefs required by the applicable rules, this Court, or the scheduling orders, including pretrial disclosures and trial briefs;
  - Preparation of the final Motion for Summary Judgment and related briefing and argument preparation.
- 13. Therefore, any argument that prior motions for summary judgment were duplicative is most as those motions were filed prior to the Offer of Judgment and therefore are not included in the fees awarded by the Court.
- 14. It is my opinion that the fees incurred by the Rogich Defendants after the Offer of Judgment, which form the basis of the fees awarded by the Court, were reasonably and necessarily incurred.
- 15. Said fees include, among other things, the tasks set forth above, as well as fees for tasks necessary for, and directly related to, preparation for trial.
- 16. Because this matter was resolved as to the Rogich Trust on the first day of the commencement of trial, all preparations for trial had to be completed in the event the trial were to go forward in its entirety.
- 17. Because all of the Rogich Defendants prevailed, apportionment is unnecessary and impractical, due to the fact that the defense of the Rogich Defendants pertained to all of them jointly. *See Mayfield v. Koroghli*, 124 NEv. 343, 184 P.3d 362 (2008).
  - 18. Further, I have reviewed the time entries from the Offer of Judgment in the context

of the Plaintiff's assertions that they constituted block billing.

- 19. While the Rogich Defendants dispute that reductions in fee award for block billing is required under Nevada law, the entries make clear that the tasks involved and referenced in the entries were not improper or unnecessary. Rather, they were comprised of tasks which were reasonable and necessary for the preparation of the defense of the Rogich Defendants and preparation for trial.
- 20. A review of the time entries, particularly from the date of the Offer of Judgment, did not reveal that the purported block billing made it impossible or impracticable to determine whether the time entries consisted of reasonable and necessary tasks.
- 21. Rather, the time entries were comprised of tasks which were reasonable and necessary for the preparation of the defense of the Rogich Defendants and preparation for trial.

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

DATED: February 28, 2020.

/s/ Brenoch Wirthlin
Brenoch Wirthlin, Esq.

# **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that on this 28<sup>th</sup> day of February, 2020, I caused the document entitled **DECLARATION OF BRENOCH WIRTHLIN IN FURTHER SUPPORT OF ROGICH DEFENDANTS' MOTION FOR ATTORNEYS' FEES** to be served on the following by Electronic Service to:

# ALL PARTIES ON THE E-SERVICE LIST

/s/Danielle Kelley

An Employee of Hutchison & Steffen, PLLC

**Electronically Filed** 3/16/2020 1:32 PM Steven D. Grierson CLERK OF THE COURT ORDR (CIV) DENNIS L. KENNEDY Nevada Bar No. 1462 JOSEPH A. LIEBMAN Nevada Bar No. 10125 **BAILEY & KENNEDY** 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 Telephone: 702.562.8820 Facsimile: 702.562.8821 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC DISTRICT COURT CLARK COUNTY, NEVADA Case No. A-13-686303-C Dept. No. XXVII ORDER GRANTING DEFENDANTS PETER ELIADES AND TELD, LLC'S **MOTION FOR ATTORNEY'S FEES** AND SETTING SUPPLEMENTAL Plaintiffs. BRIEFING ON APPORTIONMENT vs. Defendants. CONSOLIDATED WITH: Plaintiff, Case No. A-16-746239-C VS. TELD, LLC, a Nevada limited liability

8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-130 702.562.8820

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CARLOS A. HUERTA, an individual; CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company,

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive,

NANYAH VEGAS, LLC, a Nevada limited liability company,

company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive,

Defendants.

Page 1 of 4

Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees (the "Motion for Attorney's Fees") came before the Court on January 30, 2020.

# APPEARANCES

The Parties appeared as follows:

- For Peter Eliades, individually ("Eliades") and as Trustee of The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"), Teld, LLC ("Teld") and Eldorado Hills, LLC ("Eldorado Hills"): Joseph Liebman, Esq. of Bailey Kennedy, LLP.
- > For Sig Rogich, individually ("Rogich") and as Trustee of the Rogich Family Irrevocable
  Trust (the "Rogich Trust"), and Imitations, LLC (collectively, the "Rogich Defendants"):
  Brenoch Wirthlin, Esq. of Kolesar & Leatham.
- For Nanyah Vegas, LLC ("Nanyah"): Mark G. Simons, Esq. of Simons Hall Johnson PC.

# ORDER.

The Court, having heard oral argument, having reviewed the papers, exhibits, and pleadings on file, and having considered the same, and for the reasons stated upon the record, GRANTS the Motion for Attorney's Fees for the following reasons.

> Section 9(d) of the Membership Interest Purchase Agreement (the "MIPA") contains the following prevailing party attorney's fees provision.

In the event that any action or proceeding is instituted to interpret or enforce the terms and provisions of this Agreement, however, the prevailing party shall be entitled to its costs and attorney's fees, in addition to any other relief it may obtain or be entitled to.

- > Eliades and Teld are both parties to the MIPA.
- > Nanyah sued both Eliades and Teld for alleged breaches of the MIPA. In doing so, Nanyah alleged that it was an intended third-party beneficiary under the MIPA.
- > The Court finds that Nanyah was an intended third-party beneficiary under the MIPA. Thus, Nanyah is bound by Section 9(d) of the MIPA. *Canfora v. Coast Hotels and Casinos, Inc.* 121 Nev. 771, 779, 121 P.3d 599, 604 (2005).
- > The Court also finds that Eliades and Teld are the prevailing parties against Nanyah under Section 9(d) of the MIPA, as this Court previously entered summary judgment in their favor

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and dismissed all of Nanyah's claims against them. Thus, Eliades and Teld are entitled to reimbursement of their reasonable attorney's fees from Nanyah.

- "Generally, in calculating attorney's fees, the court should consider the qualities of the advocate, the character of the work to be done, the work actually performed by the lawyer, and the result." Hornwood v. Smith's Food King No. 1, 107 Nev. 80, 87, 807 P.2d 208, 213 (1991) (citing to Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969)).
- The Court further finds that Eliades and Teld have fulfilled the Brunzell factors above. Specifically, the Court finds that Eliades and Teld's counsel are qualified advocates, that the character of their work and the work performed were reasonable and justified, and that the result they obtained for Eliades and Teld-entry of summary judgment-was successful.
- The Court also finds that Eliades and Teld's counsel's hourly rates are reasonable in this community for complex commercial litigation and allowed by courts in Nevada for professional services rendered in complex commercial litigation.
- > If the Court ultimately determines that apportionment is impracticable because the claims and parties are interrelated, the Court has the discretion to decline apportionment. Mayfield v. Koroghli, 124 Nev. 343, 353-54, 184 P.3d 362, 369, (2008). However, the Court is first required to make a good faith effort to apportion attorney's fees, considering that Bailey Kennedy also represented Eldorado Hills and the Eliades Trust (two non-parties to the MIPA) in this consolidated action.
- > Accordingly, the Court orders that Eliades and Teld submit supplemental briefing in the form of an affidavit or declaration from their counsel, showing how their request for \$216,236.25 was apportioned between Eliades, Teld, the Eliades Trust, and Eldorado Hills, and to what extent Eliades and Teld claim that apportionment is impracticable due to the interrelationship between the claims and parties. Eliades and Teld's supplemental affidavit/declaration is due on February 21, 2020.
- Nanyah will have an opportunity to respond to Eliades and Teld's supplemental affidavit/declaration, and its response shall be due on March 20, 2020.

Page 3 of 4

	1	> The Court will thereafter issue a final decision on the amount of attorney's fees to which			
	2	Eliades and Teld are entitled under Section 9(d) of the MIPA.			
	3	DATED 11: 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
	4	DATED this 10 day of Manch, 2020.			
	5				
	6	DISTRICT COURT JUDGE			
	7	DISTRACT COOKT TODGE			
	8	Submitted by:			
	9	BAILEY * KENNEDY			
	10	By / A			
	11	Dennis Kennedy, Esq. Joseph Liebman, Esq.			
BAILEY * KENNEDY 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820	12	Dennis Kennedy, Esq. Joseph Liebman, Esq. 8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302			
KENI IDGEAN ADA 891 2.8820	13	Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF			
BAILEY * KEN 8984 Spanish Ridee, Las Vegas, Nevada 8 702.562.8820	14	10/30/08, TELD, LLC and ELDORADO			
SAILI 8984 SP LAS VEC	15	HILLS, LLC			
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CLERK OF THE COURT

1 NEOJ (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendant 8 PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and 9 ELDORADO HILLS, LLC 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada 14 Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company, 15 Plaintiffs. NOTICE OF ENTRY OF ORDER VS. 16 GRANTING DEFENDANTS PETER ELIADES AND TELD, LLC'S MOTION SIG ROGICH aka SIGMUND ROGICH as FOR ATTORNEY'S FEES AND SETTING SUPPLEMENTAL BRIEFING 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 **ON APPORTIONMENT** limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited 21 liability company, 22 Plaintiff, VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and

Defendants.

as Trustee of The Eliades Survivor Trust of

Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X;

and as Trustee of The Rogich Family

10/30/08; SIGMUND ROGICH, individually

and/or ROE CORPORATIONS I-X, inclusive,

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Page 1 of 3

CONSOLIDATED WITH:

Case No. A-16-746239-C

PLEASE TAKE NOTICE that an Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees and Setting Supplemental Briefing on Apportionment was entered in the above-captioned action on March 16, 2020; a true and correct copy of which is attached hereto. DATED this 16th day of March, 2020. **BAILEY KENNEDY** By: <u>/s/ Joseph A. Liebman</u> DENNIS L. KENNEDY JOSEPH A. LIEBMAN Attorneys for Defendant PETE ELÍADES, THE ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC

	<b>CERTIFICATE OF SERVICE</b>		
I cert	tify that I am an employee of BAILEY	❖KENNEDY and that on the 16th day	of March,
2020, service	e of the foregoing NOTICE OF ENT	RY OF ORDER GRANTING DEFEN	NDANTS
PETER EL	IADES AND TELD, LLC'S MOTIC	ON FOR ATTORNEY'S FEES AND S	SETTING
SUPPLEMI	ENTAL BRIEFING ON APPORTIO	<b>DNMENT</b> was made by mandatory elec	etronic
service throu	ugh the Eighth Judicial District Court's	s electronic filing system and/or by depo	ositing a
true and corr	rect copy in the U.S. Mail, first class po	ostage prepaid, and addressed to the following	lowing at
their last kno	own address:		
	ARK G. SIMONS, ESQ.	Email: msimons@shjnevada.com	
64	MONS HALL JOHNSTON PC 90 S. McCarran Blvd., Suite F-46 eno, NV 89509	Attorneys for Plaintiff NANYAH VEGAS, LLC	
Br HI	RENOCH WIRTHLIN, ESQ. UTCHISON & STEFFEN, PLLC	bwirthlin@hutchlegal.com	
10	080 West Alta Drive, Suite 200 as Vegas, NV 89145	Attorneys for Defendants SIG ROGICH aka SIGMUND ROGICH, Individually and as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST, and IMITATIONS, LLC	
JA <b>GI</b> <b>AI</b> 41	ICHAEL V. CRISTALLI NIECE S. MARSHALL ENTILE CRISTALLI MILLER RMENI SAVARESE 0 South Rampart Blvd., Suite 420 as Vegas, NV 89145	Email: mcristalli@gcmaslaw.com jmarshall@gcmaslaw.com Attorneys for Defendants SIG ROGICH aka SIGMUND ROGICH as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST	
	<u>/s/ St</u> Emple	<i>ephanie M. Kishi</i> oyee of BAILEY <b>∜</b> KENNEDY	

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ORDR (CIV) 1 DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY & KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9

# DISTRICT COURT CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company,

Plaintiffs.

vs.

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8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-130 702.562.8820

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive,

Defendants.

NANYAH VEGAS, LLC, a Nevada limited liability company,

Plaintiff,

vs.

TELD, LLC, a Nevada limited liability company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. A-13-686303-C Dept. No. XXVII

ORDER GRANTING DEFENDANTS
PETER ELIADES AND TELD, LLC'S
MOTION FOR ATTORNEY'S FEES
AND SETTING SUPPLEMENTAL
BRIEFING ON APPORTIONMENT

# CONSOLIDATED WITH:

Case No. A-16-746239-C

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Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees (the "Motion for Attorney's Fees") came before the Court on January 30, 2020.

# **APPEARANCES**

The Parties appeared as follows:

- For Peter Eliades, individually ("Eliades") and as Trustee of The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"), Teld, LLC ("Teld") and Eldorado Hills, LLC ("Eldorado Hills"): Joseph Liebman, Esq. of Bailey Kennedy, LLP.
- > For Sig Rogich, individually ("Rogich") and as Trustee of the Rogich Family Irrevocable Trust (the "Rogich Trust"), and Imitations, LLC (collectively, the "Rogich Defendants"): Brenoch Wirthlin, Esq. of Kolesar & Leatham.
- For Nanyah Vegas, LLC ("Nanyah"): Mark G. Simons, Esq. of Simons Hall Johnson PC.

# ORDER.

The Court, having heard oral argument, having reviewed the papers, exhibits, and pleadings on file, and having considered the same, and for the reasons stated upon the record, GRANTS the Motion for Attorney's Fees for the following reasons.

> Section 9(d) of the Membership Interest Purchase Agreement (the "MIPA") contains the following prevailing party attorney's fees provision.

> In the event that any action or proceeding is instituted to interpret or enforce the terms and provisions of this Agreement, however, the prevailing party shall be entitled to its costs and attorney's fees, in addition to any other relief it may obtain or be entitled to.

- Eliades and Teld are both parties to the MIPA.
- > Nanyah sued both Eliades and Teld for alleged breaches of the MIPA. In doing so, Nanyah alleged that it was an intended third-party beneficiary under the MIPA.
- The Court finds that Nanyah was an intended third-party beneficiary under the MIPA. Thus, Nanyah is bound by Section 9(d) of the MIPA. Canfora v. Coast Hotels and Casinos, Inc. 121 Nev. 771, 779, 121 P.3d 599, 604 (2005).
- > The Court also finds that Eliades and Teld are the prevailing parties against Nanyah under Section 9(d) of the MIPA, as this Court previously entered summary judgment in their favor

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and dismissed all of Nanyah's claims against them. Thus, Eliades and Teld are entitled to reimbursement of their reasonable attorney's fees from Nanyah.

- "Generally, in calculating attorney's fees, the court should consider the qualities of the advocate, the character of the work to be done, the work actually performed by the lawyer, and the result." Hornwood v. Smith's Food King No. 1, 107 Nev. 80, 87, 807 P.2d 208, 213 (1991) (citing to Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969)).
- The Court further finds that Eliades and Teld have fulfilled the Brunzell factors above. Specifically, the Court finds that Eliades and Teld's counsel are qualified advocates, that the character of their work and the work performed were reasonable and justified, and that the result they obtained for Eliades and Teld-entry of summary judgment-was successful.
- The Court also finds that Eliades and Teld's counsel's hourly rates are reasonable in this community for complex commercial litigation and allowed by courts in Nevada for professional services rendered in complex commercial litigation.
- > If the Court ultimately determines that apportionment is impracticable because the claims and parties are interrelated, the Court has the discretion to decline apportionment. Mayfield v. Koroghli, 124 Nev. 343, 353-54, 184 P.3d 362, 369, (2008). However, the Court is first required to make a good faith effort to apportion attorney's fees, considering that Bailey Kennedy also represented Eldorado Hills and the Eliades Trust (two non-parties to the MIPA) in this consolidated action.
- > Accordingly, the Court orders that Eliades and Teld submit supplemental briefing in the form of an affidavit or declaration from their counsel, showing how their request for \$216,236.25 was apportioned between Eliades, Teld, the Eliades Trust, and Eldorado Hills, and to what extent Eliades and Teld claim that apportionment is impracticable due to the interrelationship between the claims and parties. Eliades and Teld's supplemental affidavit/declaration is due on February 21, 2020.
- Nanyah will have an opportunity to respond to Eliades and Teld's supplemental affidavit/declaration, and its response shall be due on March 20, 2020.

Page 3 of 4

	1	> The Court will thereafter issue a final decision on the amount of attorney's fees to which			
	2	Eliades and Teld are entitled under Section 9(d) of the MIPA.			
	3	DATED 11: 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
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	6	DISTRICT COURT JUDGE			
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	9	BAILEY * KENNEDY			
	10	By / A			
	11	Dennis Kennedy, Esq. Joseph Liebman, Esq.			
BAILEY * KENNEDY 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820	12	Dennis Kennedy, Esq. Joseph Liebman, Esq. 8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302			
KENI IDGEAN ADA 891 2.8820	13	Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF			
BAILEY * KEN 8984 Spanish Ridee, Las Vegas, Nevada 8 702.562.8820	14	10/30/08, TELD, LLC and ELDORADO			
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# DISTRICT COURT

# **CLARK COUNTY, NEVADA**

CASE NO.: A-13-686303-C DEPT. NO.: XXVII

**CONSOLIDATED WITH:** CASE NO.: A-16-746239-C

NANYAH VEGAS, LLC'S SUPPLEMENT TO ITS OPPOSITION TO PETER **ELIADES AND TELD, LLC'S MOTION FOR ATTORNEYS' FEES AND COSTS** 

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Plaintiff Nanyah Vegas, LLC ("Nanyah"), by and through its undersigned counsel, Mark G. Simons of SIMONS HALL JOHNSTON PC, submits the following Supplement to its Opposition to the Motion for Attorneys' Fees and Costs (the "Motion") filed by Peter Eliades individually ("Eliades") and Teld, LLC ("TELD") (collectively referred to herein as the "Eliades Defendants" unless otherwise specified).

## BASIS OF SUPPLEMENT.

This supplement is filed in response to the Declaration of Joseph A. Liebman in Further Support of Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees ("Declaration"). Due to the inability of the Court to analyze which attorney's fees related to the representation of Eliades and TELD, versus the representation of other defendants, the Court required Eliades' and TELD's counsel to submit a "better explanation" "with regard to apportionment between the non-moving parties and the moving parties." Trans., p.13:15-17.

Of critical note, the Eliades Trust ("Eliades Trust") and Edorado Hills, LLC ("Eldorado") do not seek recovery of attorneys' fees. The reason the Eliades Trust did not seek any attorneys' fees is because there were no contract-based claims asserted against it.

# THERE IS STILL NO EVIDENCE BEFORE THIS COURT THAT THE MOVING PARTIES "ACTUALLY" INCURRED THE REQUESTED FEES.

What is now clearly established is there is no evidentiary support for an award of fees to the moving parties. While the Declaration asserts there was a "joint defense", there is no discussion or evidence that the moving parties incurred the fees being paid for by Eldorado and/or the Eliades Trust. Instead, the moving parties claim, without support that Mr. Eliades owns all the defendants so it is irrelevant which of the defendants actually paid the fees. Reply, p., 7:9-10. Further, counsel for the moving

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parties self-servingly avoids addressing that the moving parties did not incur the fees by baselessly asserting that "all defendants incurred these fees". Id., fn.10. Counsel's declaration without any personal knowledge is pure speculation and cannot be accepted as true by this Court. Wayment v. Holmes, 112 Nev. 232, 237, 912 P.2d 816, 819 (1996) ("conclusory statements . . . will not be accepted as true."). Because the claims were so varied, the party who paid for the fees is the party entitled to recovery (if such recovery is available).

Then, the Declaration again attempts to bypass this critical defect and again merely asserts that because Mr. Eliades owns all the defendants, it is irrelevant which defendant actually incurred and paid the fees. Dec., ¶5. This factually and legally baseless contention requires outright denial of the request for attorneys' fees as this Court cannot make a factual finding that the moving party actually incurred the fees. Pursuant to the defendants' joint venture agreement, Eldorado paid all fees under the terms of the Eldorado Operating Agreement (which obligates Eldorado Hills to indemnify and pay for the defense of all claims asserted against any member).

Eldorado and the Eliades Trust did not move for recovery of attorneys' fees, instead their attorneys claim that all fees were incurred by only Eliades and Teld. So, the moving parties are seeking recovery of all fees and costs even though other defendants have not claimed recovery of such fees and are the ones who actually incurred such fees. Merely because counsel represents multiple defendants does not allow the Court to award fees to a party when that party has not actually incurred the costs and where there is no evidence presented to the Court that the moving parties actually were liable and/or paid for such requested fees. See e.g., Gibellini v. Klindt, 110 Nev. 1201, 1205, 885 P.2d 540, 543 (1994) (expenses must "actually" be incurred by the party to be recovered).

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#### 111. THE DECLARATION IS NOTHING MORE THAN A SELF-SERVING SUBSTANCELESS STATEMENT WITHOUT ANY EVIDENTIARY BASIS.

This Court has to exercise its authority to protect the rights of all litigants, not just those litigants it favors. In the present case, counsel seeking attorney's fees represented four (4) different defendants. The Eliades Trust and Eldorado Hills, LLC ("Eldorado") did not seek an award of attorneys' fees in this action.

The Declaration is premised on the sole contention that there was a "joint defense" between all four (4) defendants so that it is "impossible" to apportion which fees related to which parties. In the present case, whether or not there was a joint defense is irrelevant to the analysis of apportionment. This is because the "claims" that were asserted must be analyzed. While it is anticipated that this Court will grasp at the "impossibility to apportion" contention, the ability to differentiate the claims asserted against each defendant is rather easy.

The Declaration does correctly identify that Nanyah's claims are premised upon the fact that it is "entitled to reimbursement of a \$1,500,000 alleged investment into Eldorado Hills." Dec., p.2:6-27. However, as much as Eldorado would like to pretend it was an "alleged" investment, this Court has found as a matter of undisputed fact and as a matter of law, that Nanyah did in fact invest \$1,500,000 into Eldorado. See Order dated October 5, 2018.

Again, the issue is not the premise of Nanyah's injury, but the specific claims asserted against each specific party. Mayfield v. Koroghli, 124 Nev. 343, 353, 184 P.3d 362, 369 (2008) ("in an action in which a plaintiff pursues claims based on the same factual circumstance against multiple defendants, it is within the district court's discretion

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to determine whether apportionment is rendered impracticable by the interrelationship of the claims against the multiple defendants." (emphasis added)).

Of course, Eliades and Teld contend that the claims were intertwined so as to preclude apportionment. However, this statement is not true. A simple analysis of the claims demonstrates that apportionment is easy to perform.

#### Α. Court's May 22, 2018 Order.

On May 22, 2018, the Court entered its Order granting summary judgment dismissing Nanyah's 5th Claim for Constructive Trust against Eliades Trust and the 7th Claim for Fraudulent Transfer against the Eliades Trust. Again, the 5th and 7th claims were asserted only against the Eliades Trust and were based upon non-contract legal principals. Accordingly, the contracts at issue did not form the basis of the claims. Further, only the Eliades Trust was the defendant under these claims.

The Declaration makes no attempt to remove these non-contract based claims asserted against the Eliades Trust. Further, there was no contractual right of entitlement to recovery of attorneys' fees asserted under either of these claims against the Eliades Trust. The Declaration makes no effort to differentiate any fees related to these discrete claims for which attorneys' fees are not recoverable. This Court cannot award attorneys fees on claims asserted: (1) in favor of parties not requesting any such fees (the Eliades Trust); and (2) for which there is not a right to recover any fees since they are not contract based claims. Stated another way, Eliades and Teld seek an award of fees for work performed for a non-moving party and for which there is no contractual right to recovery of fees. Instead, the moving parties and this Court continue to ignore this fatal defect in assessing the movant's request for fees.

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Similarly, the Rogich Trust filed a Motion to Reconsider and a Motion for Rehearing of the Court's May 22, 2018, Order. The Eliades Trust continued to participate and engage in briefing in relation to these motions. Again, these motions were based upon claims asserted against the non-moving party Eliades Trust and based upon non-contract based claims. However, no effort was undertaken to apportion these unrelated fees.

In addition, Nanyah filed its own Motion to Reconsider the dismissal of the claims asserted against the Eliades Trust, to which the Eliades Trust opposed. Again, all these non-recoverable fees incurred by a non-moving party, based upon non-contract claims are improperly included in the fee request and should be denied

#### В. Court's October 5, 2018 Order.

On October 22, 2018, the Court entered its Order granting summary judgment dismissing Nanyah's 1st claim for breach of contract; 2<sup>nd</sup> claim for contractual breach of the implied covenant of good faith and fair dealing; 3rd claim for tortious breach of the implied covenant of good faith and fair dealing, 6th claim for conspiracy. Nanyah agrees that the 1st and 2nd claims were the claims asserted against Eliades and Teld were premised on contractual liability. The 3<sup>rd</sup> and 6<sup>th</sup> claim were premised on tort liability, i.e., non-contract claims. Accordingly, apportionment for these contract versus non-contract claims is entirely appropriate for apportionment. However, the Declaration fails to do so and it is not Nanyah's obligation to undertake such apportionment analysis.

#### C. Apportionment is Capable of Performance.

The claims against Eliades Trust were premised on non-contract based claims. The claims were also premised on a single transfer of the Rogich Trust's membership interest in Eldorado that took place in the fall of 2012. These claims were not related to the claims against Eliades and the Trust arising out of transactions that occurred in 2008.

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Instead, there was almost a four (4) year time difference between the applicable events and the claims were based on entirely different facts. There is no intertwining of any of the issues.

Further, given that the focus of the May 22, 2018, summary judgment was appliable to claims against the Eliades Trust any award of fees must be reduced and apportioned to the Eliades Trust. Based upon Nanyah's review of the billing records and motion practice 50% of the attorney's fees incurred related to the defense of the Eliades Trust. Accordingly, the requested attorneys' fees should be reduced by 50%.

#### II. CONCLUSION.

Based upon the foregoing, there is no evidentiary basis to award fees to the moving parties because there is no evidence before this Court that the fees were actually incurred. It is this Court's responsibility to comply with the law and since there is no evidentiary support for such award, it must be denied in total. In addition, assuming the Court will ignore this lack of evidentiary support, the fees should be apportioned since the analysis is based upon the "claims". Not a joint defense agreement.

**AFFIRMATION**: This document does not contain the social security number of any person.

DATED this \_\_\_\_\_\_ day of March, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

By:

MARK G./SIMONS Attorney's for Nanyah Vegas, LLC

# SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

# **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and EDCR 8.05, I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of the NANYAH VEGAS, LLC'S SUPPLEMENT TO ITS OPPOSITION TO PETER ELIADES AND TELD, LLC'S MOTION FOR ATTORNEYS' FEES AND COSTS on all parties to this action via the Odyssey E-Filing System:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the abovereferenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

DATED this 19 day of March, 2020.

Employee of Simons Hall Johnston PC

**Electronically Filed** 3/19/2020 4:53 PM Steven D. Grierson **CLERK OF THE COURT** 

### DISTRICT COURT

# **CLARK COUNTY, NEVADA**

CASE NO.: A-13-686303-C DEPT. NO.: XXVII

**CONSOLIDATED WITH:** CASE NO.: A-16-746239-C

NANYAH VEGAS, LLC'S SUPPLEMENT TO ITS OPPOSITION TO ROGICH **DEFENDANTS' MOTION FOR** ATTORNEYS' FEES AND COSTS

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Plaintiff Nanyah Vegas, LLC ("Nanyah"), by and through its undersigned counsel, Mark G. Simons of SIMONS HALL JOHNSTON PC, submits the following Supplement to the opposition to the Motion for Attorneys' Fees and Costs (the "Motion") filed by Sigmund Rogich, individually as Trustee of the Rogich Family Irrevocable Trust ("Rogich Trust") and Imitations, LLC ("Imitations") (collectively referred to herein as the "Rogich Defendants" unless otherwise specified).

#### BASIS OF SUPPLEMENT. I.

This supplement is filed in response to the Declaration of Brenoch Wirthlin in Further Support of Rogich Defendants' Motion for Attorney's Fees ("Declaration"). Due to the inability of the Court to analyze the block billing and massive redactions of the billing records submitted, the Court required the Rogich Defendants' counsel to submit "an affidavit in support with regard to an explanation of why things were redacted, and with regard to the block billing and why it was done and why you can justify it. Exhibit 1, Trans., p.15:12-14. The Court required the Declaration because neither the Court and/or counsel for Nanyah were provided with unredacted copies of the billing statement.

#### II. GRANTING THE MOTION WOULD BE A FARCE.

While it is obvious that this Court is ready to rubberstamp the Rogich Defendants' request for fees, to do so would be a farce. Literally every entry in the submitted records are redacted except for minor unredacted words like: "Telephone conference with . . . ", "study . . . ", "review . . . ", "legal research . . . ", "prepare . . . . ", "finalize . . . . ", "review and respond . . . ." and a variety of other uninformative statements. See Exhibit 2 attached hereto which are the Rogich Defendants' Billing Records (attached to the opening motion as Exhibit 6).

Strangely, despite the entirety of the substance of the billing records being

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redacted, this Court said: "there was sufficient detail that I could determine that the time was reasonable spent . . . ." Exh. 1, p. 15:5-6. It defies logic to believe the Court could discern that there was sufficient detail that it could determine the time was well spent when it is literally impossible to know what was allegedly done. Further, the Court claims that "I didn't find that it was churning or duplicative work." Id., p.15:9-10. It is again unfathomable that the Court could make such a finding when the Court could not even tell what was purportedly done. Instead, it is clear that this Court will grant the motion regardless of Nanyah's objections.

Further, the Court gratuitously commented that the hourly rates were low for the work performed. Id., p.15:6-7. Again, this is impossible to determine. Mr. Lionel (a 100year-old man), was billing at the rate of \$650.00 an hour and billing massive amounts of time. Yet, it is impossible to determine whether he did any substantive work on the case, duplicative work performed by others and/or just billed massive amounts of time knowing that the Court would approve anything submitted without flinching or any substantive analysis.1

Similarly, there was massive block billing in the submitted redacted billing statement. Again, even though fully redacted, this Court again "I could tell from what I know ... and from their descriptions and the time that I felt the time was justified ...." Exh. 1, p. 18:20-23. The Court must be clairvoyant to make that type of comment, because there is literally not a single description of the activities performed in the submitted billing.

<sup>1</sup> For instance, Mr. Lionel charged almost \$1 million alone in fees on a case where Nanyah's claim was for \$1.5 million.

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Nanyah is entitled to a fair application of the law and any award of fees in this instance based upon the deficient information provided to this Court should be denied. It is not this Court's sworn duty to write blank checks to a party based upon fully redacted billing records being submitted to this Court.

#### Ш. THE DECLARATION IS NOTHING MORE THAN SELF-SERVING AND CONCLUSORY.

The Court provided the Rogich Defendants the opportunity to cure the 100% redaction of the substance of the billing records and the block billing. Neither were accomplished. Instead, the Declaration contains nothing more than conclusory statements provided by counsel. Counsel claims in his opinion, none of the activity was duplicative, all work was reasonable and necessary and that the block billing was not actually block billing and that "the entries make clear that the tasks involved and referenced in the entries were not improper or unnecessary." Declaration, ¶¶12, 14, 19.

Counsel's declaration and self-serving statements cannot be accepted as true by this Court. Wayment v. Holmes, 112 Nev. 232, 237, 912 P.2d 816, 819 (1996) ("conclusory statements . . . will not be accepted as true."). As the United States Supreme Court held in Hensley v. Eckerhart, 461 U.S. 424, 434, 103 S. Ct. 1933, 1939-40, 76 L. Ed. 2d 40 (1983), fees that are not reasonably expended on a case are improperly awarded as follows:

The district court also should exclude from this initial fee calculation hours that were not "reasonably expended." . . . Cases may be overstaffed, and the skill and experience of lawyers vary widely. Counsel for the prevailing party should make a good faith effort to exclude from a fee request hours that are excessive, redundant, or otherwise \*\*1940 unnecessary, just as a lawyer in private practice ethically is obligated to exclude such hours from his fee submission. "In the private sector, 'billing judgment' is an important component in fee setting. It is no less important here. Hours that are not properly billed to one's client also are not properly billed to one's adversary pursuant to statutory authority."

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The burden placed on this Court is clear and was laid out in Beattie v. Thomas, 99 Nev. 579, 588-589, 668 P.2d 268, 274 (1983) when this Court was instructed that it "must carefully evaluate . . . whether the fees sought by the offeror are reasonable and justified in amount." The only information this Court has before it is a fully redacted billing statement only showing date, hours billed, timekeeper and amounts with a total amount of \$541,021 allegedly incurred. Given the foregoing, all amounts sought are unreasonable and unjustified.

Further, fundamental constitutional due process requirements require that Nanyah be afforded the opportunity to be presented with, review and challenge the claim for attorney's fee in this action. In Callie v. Bowling, 123 Nev. 181, 183, 160 P.3d 878, 879 (2007) the Nevada Supreme Court held:

Both the United States Constitution and the Nevada Constitution guarantee that a person must receive due process before the government may deprive him of his property. This court has recognized that procedural due process "requires notice and an opportunity to be heard."

Id. While notice has been provided of these proceedings, Nanyah has been denied the opportunity to be heard on this issue and therefore, any award of fees in these circumstances is a deprivation of due process.2

Of Note, Nanyah requested an evidentiary hearing so as to protect its due process rights. While Nanyah recognizes that an evidentiary hearing may not be required before an award of attorneys' fees and costs, in this situation, given that the entirety of the billing statements were redacted. Nanyah was not afforded an opportunity to contest the fees sought. See e.g., Sandy Valley Assocs. v. Sky Ranch Estates Owners Assoc., 117 Nev. 948, 956, 35 P.3d 964, 969 (2001) ("Procedurally, when parties seek attorney fees as a cost of litigation, documentary evidence of the fees is presented to the trial court, generally in a post trial motion. . . . Thus, when a court is requested to award attorney fees as a cost of litigation, the matter is decided based upon pleadings, affidavits and exhibits.").

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#### Α. THE FEES SOUGHT ARE UNREASONABLE AND UNJUSTIFIED.

#### 1. The Fees are Unjustified.

From the attached billing records, it is literally impossible to determine what alleged actions took place by what alleged timekeeper. Other than the dates of time entries, every task is redacted. Such action prohibits Nanyah from addressing the alleged charges and deprives it of the right of due process since Nanyah is prevented from contesting the reasonableness of the time billed, the persons allegedly performing the tasks and the applicability and reasonableness of the alleged time. For instance, the billing records are full of multiple timekeepers working on practically a daily basis on tasks that appear to be duplicative of the same tasks performed by others and/or previously performed.

Further, there is obvious block billing.<sup>3</sup> Block billing is improper and cannot form the basis of an award of fees when it is impossible for Nanyah to examine the alleged tasks and billing rates and time. See Okla. Natural Gas Co. v. Apache Corp., 355 F.Supp.2d 1246, 1264 (N.D. Okla.2004) (finding that it was difficult, if not impossible, to review the reasonableness of block-billed time entries, one of which was a time entry for 7.3 hours containing eight tasks). Based upon the block billing, the requested fees should be reduced by 75%. See e.g., Lahiri v. Universal Music & Video Distrib. Corp., 606 F.3d 1216, 1222-23 (9th Cir. 2010) (affirming district court's reduction of 80% of attorneys'

<sup>&</sup>lt;sup>3</sup> See e.a., Exh. 2, entries dated 4/15/19: 10.10 hours for Brenoch Wirthlin (tasks redacted); 4/16/19: 14.90 hours for Brenoch Wirthlin (tasks redacted); 4/18/19: 10.20 hours for Brenoch Wirthlin (tasks redacted); 4/19/19: 11.40 hours for Brenoch Wirthlin (tasks redacted); 4/20/19: 7.40 hours for Brenoch Wirthlin (tasks redacted). These are merely a few of the egregious examples and do not constitute all of the block billing conduct.

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hours to account for block-billing); Schrum v. Burlington N. Santa Fe Ry. Co., 2008 WL 2278137, \*9 (D. Ariz. May 30, 2008) (applying 75% reduction due to block billing and duplicative tasking).4

#### 2. The Work Performed Was Meaningless And/Or Regurgitation Of Prior Failed Actions.

The vast majority of the fees incurred appear to be based upon the preparation and filing of futile and unsuccessful motions that had previously been rejected by the Court. Specifically, the Rogich Defendants filed their Motion for Relief from the October 5, 2018 Order Pursuant to NRCP 60(b) (the "60(b) Motion"). The 60(b) Motion was merely a regurgitation of the Rogich Trust's Motion to Reconsider the October 5, 2018 Order (filed June 5, 2018) and the Rogich Trust's Motion For Rehearing (filed August 17, 2018). The Court denied both of these motions finding that they were baseless as there was "no mistake, inadvertence, surprise or excusable neglect" that supported the requested relief. See Order, dated March 26, 2019, p. 2. Similarly, the Rogich Defendants filed motions in limine that were baseless and unwarranted. See Order, dated May 26, 2019, p. 2.

Further, the Rogich Trust merely reformatted its prior filed Motion for Reconsideration and Motion for Rehearing and captioned it a "Motion for Summary Judgment" and filed this document on February 15, 2019. This Court again found that the

<sup>&</sup>lt;sup>4</sup>See also Role Models Am., Inc. v. Brownlee, 353 F.3d 962, 971 (D.C.Cir. 2004) (reducing requested hours because counsel's practice of block billing "lump[ed] together multiple tasks, making it impossible to evaluate their reasonableness"); see also Hensley, 461 U.S. at 437, 103 S.Ct. 1933 (holding that applicant should "maintain billing time records in a manner that will enable a reviewing court to identify distinct claims"); Fischer v. SJB-P.D. Inc., 214 F.3d 1115, 1121 (9th Cir. 2000) (holding that a district court may reduce hours to offset "poorly documented" billing).

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Rogich Defendants' motion for summary judgment was untimely and struck it. See Order, dated March 22, 2019, p. 2.

Based upon the foregoing, no fees should be granted given the inability for Nanyah to review and/or contest the fees sought. To the extent the Court ignores this limitation on Nanyah's ability to contest the fees, 75% of the alleged fees were incurred for these meaningless and repetitive motions that were all baseless and without merit and/or were for block billing. Accordingly, at best, even assuming all other prongs were satisfied, \$135,250 in fees is all that would be appropriate.

#### There Is No Differentiation Between Parties And 3. Claims.

The Declaration also did not differentiate between any of the parties allegedly incurring the fees and/or to which claims the fees may or may not have been applicable.

#### IV. CONCLUSION.

The Motion has no legal merit and should be denied in its entirety.

**AFFIRMATION**: This document does not contain the social security number of any person.

day of March, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

By: MARK G. SIMONS

Attorneys for Nanyah Vegas, LLC

### SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and EDCR 8.05, I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of the NANYAH VEGAS, LLC'S SUPPLEMENT TO ITS OPPOSITION TO ROGICH DEFENDANTS' MOTION FOR ATTORNEYS' FEES AND COSTS on all parties to this action via the Odyssey E-Filing System:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the abovereferenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

DATED this \_\_\_\_\_ day of March, 2020.

Employee of Simons Hall Johnston PC

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

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# **EXHIBIT 1**

## **EXHIBIT 1**

**Electronically Filed** 2/12/2020 1:34 PM Steven D. Grierson CLERK OF THE COURT 1 **RTRAN** 2 3 4 DISTRICT COURT 5 **CLARK COUNTY, NEVADA** 6 7 CARLOS HUERTA, 8 CASE NO: A-13-686303-C Plaintiff(s), 9 DEPT. XXVII VS. 10 ELDORADO HILLS LLC, 11 Defendant(s). 12 13 BEFORE THE HONORABLE NANCY ALLF, DISTRICT COURT JUDGE 14 THURSDAY, JANUARY 30, 2020 15 16 RECORDER'S TRANSCRIPT OF PROCEEDINGS 17 RE: MOTIONS 18 **APPEARANCES:** 19 20 MARK G. SIMONS, ESQ. For the Plaintiff(s): 21 For the Defendant(s): JOSEPH A. LIEBMAN, ESQ. 22 23 BRENOCH WIRTHLIN, ESQ. For the Trustee Rogich: 24 25 RECORDED BY: BRYNN WHITE, COURT RECORDER Page 1

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#### LAS VEGAS, NEVADA, THURSDAY, JANUARY 30, 2020

[Proceeding commenced at 11:01 a.m.]

THE COURT: Huerta versus Eldorado Hills.

I'm going to ask for a short recess to give you a chance to set up and give me a comfort break so I can listen to your arguments.

[Recess taken from 11:01 a.m., until 11:05 a.m.]

THE COURT: Thank you. Please remain seated.

All right. Guys, as a preliminary matter, apparently the Supreme Court is not certain that there's a final order in this case. Let's address that first, as to whether or not we should properly proceed today.

MR. SIMONS: We have a stipulation that will resolve that.

THE COURT: Oh, okay.

MR. SIMONS: Everybody signed off on it.

THE COURT: Is that correct?

MR. LIEBMAN: Yes, Your Honor.

THE COURT: You know, I didn't take your appearances for the record. Let's do that, please.

MR. LIEBMAN: Joseph Liebman, on behalf of TELD, Pete Eliadas, the Eliadas Trust, and Eldorado Hills.

THE COURT: Thank you.

MR. WIRTHLIN: Good morning, Your Honor. Brenoch Wirthlin, on behalf of the Rogich defendants.

THE COURT: Thank you.

MR. SIMONS: Mark Simons, on behalf of Nanyah, Your Honor.

THE COURT: All right. And Mr. Simons, will you outline the terms of the stipulation for the record, please.

MR. SIMONS: Yes. The term -- the stipulation addresses the Supreme Court's recent order wanting finality of the decisions out of this Court, and that would -- specifically in relation to Claim 8 and Claim 9, Specific Performance of Dec Relief.

We stipulated as those claims are withdrawn in the trial statement, and they didn't -- even though it was withdrawn in the trial statement, there was nothing of any order addressing that. So we've executed the stipulation affirming that, so that this could be signed off and could be provided to the Supreme Court to demonstrate jurisdiction.

THE COURT: Thank you. And that's correct?

MR. LIEBMAN: That's correct, Your Honor.

THE COURT: That's correct?

MR. WIRTHLIN: Yes, Your Honor.

THE COURT: And please approach. And I've signed it in open court so that it may be filed immediately.

MR. SIMONS: Thank you.

THE COURT: Thank you, both.

All right. So now that that issue is resolved, the way that I would like to hear the matters today would be the TELD Motion for

Attorney Fees, the Eliadas Motion -- I'm sorry -- Eliadas, and then the Rogich Motion for Attorneys' Fees -- one opposition as to both and then reply. And after that, the issues about retaxing costs.

Any objection to that format?

MR. LIEBMAN: No, that's fine.

MR. SIMONS: That's fine.

MR. WIRTHLIN: Fine with us, Your Honor.

THE COURT: Very good.

All right. Mr. Liebman.

MR. LIEBMAN: Good morning, again, Your Honor. This is Pete Eliadas and TELD LLC's Motion for Attorney Fees.

The primary basis for this motion is binding Nevada precedent, specifically *Canfora v. Coast Hotels*, which explicitly holds that an intended third-party beneficiary is bound by the terms of the contract, even if she is not a signatory. This is pretty much brought -- Black Letter Law across the country. And numerous other courts have expanded on the legal principle, holding explicitly that a third-party beneficiary is bound by a contract that it attempts to invoke.

And that's precisely what Nanyah Vegas did here. Nanyah Vegas sued both Pete Eliadas and TELD LLC under the Membership Interest Purchase Agreement, pointing to specific language in that agreement to claim that it was entitled to a \$1.5 million payment, and sued both Pete Eliadas and TELD for an alleged breach of that particular agreement; claimed to be a third-party beneficiary under

 that agreement because they did not sign the agreement.

And in fact, in the opposition, Nanyah continues to take that position to this day, stating as much in the opposition to the motion.

That particular agreement in Section 9(d) contains a pretty typical prevailing party attorney's fees provision. It says it applies to any action to enforce the terms of the agreement. It's not limited to disputes between the named parties or signatories to the agreement. Accordingly, there was certainly a factual and a legal basis under Section 9(d) to award Pete Eliadas and TELD LLC their attorney's fees against Nanyah as the prevailing party.

It's also worth noting that Nanyah also pled an entitlement to attorney's fees in their complaint. And it would be extremely inequitable to say that, well, if Nanyah had proved that it was a third-party beneficiary and proved that Pete Eliadas and TELD LLC breached that particular agreement, it was entitled to attorney's fees -- but that it doesn't work the other way around, especially considering the language of that provision that says it applies to any dispute. It does not need to be a dispute between the parties to the particular agreement.

The last issue, I think, is the apportionment issue. The Eliadas Trust and Eldorado Hills are not parties to the Membership Interest Purchase Agreement. The claims against those particular parties were a little bit different and not based on that particular agreement, although the allegation was pretty much the same, the

 \$1.5 million payment.

There is binding Nevada precedent dealing with these apportionment issues in Nevada, the *Mayfield v. Koroghli* case. And they talk about when you have a case where the claims are so intertwined and interspersed that it really would be impracticable to try to separate and say, okay, this particular fee for this deposition over here is for Eldorado Hills and this particular fee for this hearing over here was for TELD.

It's really -- based on the nature of this case, it's not practicable to be able to do that. And under the authority of that case, we believe that means that the Court is not required to apportion the fees and would be entitled to grant the entire amount sought.

The bottom line is, if he had just sued Pete Eliadas and TELD for a breach of this particular agreement, at least up until the time that they were dismissed, the attorney's fees would pretty much have been the same amount anyway. I mean, all the -- because the issues were intertwined.

And it's worth noting that the attorney's fees request does not include anything incurred by Eldorado Hills after Pete Eliadas and TELD were dismissed back last year on the Motion for Summary Judgment -- or two years ago on the Motion for Summary Judgment. So that does take that out of the equation.

Unless the Court has any questions, that's pretty much the motion.

 THE COURT: I don't.

Mr. Wirthlin.

MR. WIRTHLIN: Well, Your Honor, I don't have a whole lot to add to our --

THE COURT: Mr. Wirthlin, give Mr. Simons a chance to get to back to --

MR. WIRTHLIN: Oh. I apologize. Sorry about that.

THE COURT: Go ahead, please.

MR. WIRTHLIN: Don't have much to add. Just kind of want to hit a couple of the highlights. We believe that there is a basis under 18.010(2)(b) to add -- excuse me -- to award attorney's fees in their entirety. But alternatively, certainly from the offer of judgment which we believe was submitted in good faith and was reasonable, and rejection of that was not -- was not reasonable as set forth in the motion.

We do believe that block billing is not an issue that the Nevada Supreme Court has ever said justifies lowering an award, so we would object to that. But if the Court wants to see the attorney's fees unredacted or the invoices, we're certainly happy to provide those to the Court *in camera*, if the Court would like to do -- to see those.

And finally, we don't believe apportionment is appropriate, given that these defendants were basically executing a joint defense.

So unless the Court has any questions, we reserve the

right to reply.

THE COURT: I don't.

MR. SIMONS: Just one moment, Your Honor. Okay. So I'll address in order of presentation.

All right. First off, this is very important for the Court to recognize that Mr. Kennedy and Mr. Liebman represented four different defendants. All right. Only two of the defendants have moved for recovery of attorney's fees, but those two are claiming all the attorney's fees should be applied to them as -- because they were successful in this case.

And the first time, I just heard today, that certain of the fees for Eldorado were carved out. That's not true. I just was looking through. That's why I said but there's no differentiation. They lump it all in a big pile and say, oh, we think we get this recovery.

And there -- you heard the claims were substantially different against these entities, and each one of them, and there has to be an apportionment. There's an argument that apportionment shouldn't apply just because that wouldn't be right. They should get all their attorney's fees.

Now, let's go to actually what their contention is that's based upon a contract provision that a third party is bound by a contract and award of attorney's fees. And let's step through that.

The actual language of the contract, it says, Parties.

Nanyah is not a party. Clear case law that a third-party beneficiary is

 not a party, so the contract can't bind a nonparty with regards to an award of attorney's fees. And it also says, Third party is bound by affirmative defenses. Attorney' fees are not a defense. Clear case law on that.

Then we get to the, Nanyah does not stand in the shoes. You just can't throw them in as a party.

Can we assert rights? Yes. And we're subject to the terms and conditions of the contract. The award of attorney's fees to the prevailing party is not one of the provisions that is applicable.

They take extra-jurisdictional case law out of California and Utah to say, Look, you should apply this reciprocally. Now, I'm very familiar with this, because I've actually been trying to change the legislation on this and get Nevada into a reciprocal state to be compatible with the two.

THE COURT: Sure.

MR. SIMONS: We have -- there's no -- we're not getting any traction. It doesn't seem to be an issue that is -- the legislature wants to address. So what that says is unilateral fee agreements aren't unilaterally, the prevailing party. Landlord wins? No recovery for a tenant if there's not a reciprocal provision.

So what they're trying to do is hodgepodge some
California reciprocal provisions and overlay it on the third party, and
all of a sudden, magically, a third party is bound by an attorney's
fees clause. None of their arguments are substantiated with every
detail, each one of these points in the brief.

 Also, going to the Rogich request for attorney's fees -- and this one's interesting. Because they start out with 18.010(2)(a), claiming that they are entitled as a prevailing party. But you have to have a monetary judgment on that. They bailed on that. And now they're jumping on 18.010(2)(b), which, again, they said, was baseless claims. But they can't get around the fact that this Court's already determined that, look, you have an obligation to pay. The Court found a different reason to dismiss the case.

Now that brings us to the NRCP 68, they're claiming, which is the offer of judgment. And we say, No application, and if you apply, you've really got to look at the work that was done. They pile the work and rebill for duplicative work, spotting the same motions over and over and over. I brought it to your attention. They filed a Motion for Rehearing, Motion for Reconsideration, all getting denied. So they're just churning the case.

Lastly, we have the block billing, block billing is there. Block billing is disapproved of by the Nevada Supreme Court. And based upon these situations, with regard to the Rogich, we said there should be at least a 75 percent reduction for the block billing and the duplicative work, even if this Court was somehow going to find that there was an entitlement to an award under 68.

That's all I've got.

THE COURT: This might be the shortest hearing we've ever had in this case. I spent hours getting ready for your hearing. So all right.

MR. LIEBMAN: Well, I'll try to be brief then, Your Honor, because you're obviously very prepared.

Just a couple things I wanted to point out. What I said about Eldorado Hills fees being taken out -- that was all the fees Eldorado Hills incurred once they became the sole party we were defending in this particular case. Everything else was so intertwined, it was really impossible to carve anything out specific to Eldorado Hills.

With respect to *Canfora v. Coast Hotels*, Mr. Simons did not address that finding. Nevada precedent -- obviously it's not an attorney's fees provision case, but it does hold the Black Letter principle that an intended third-party beneficiary is bound by the terms of the contract, even if she is not a signatory. We cited those California and Utah cases that have the reciprocal fee provisions because they talk about how unjust and inequitable it would be to say, okay, you get fees if you win, but you don't get fees if you don't win.

The bottom -- and the Court certainly can take equity into account in making a decision on this particular point. But the fact of the matter is this is not a unilateral fee provision. The fee provision, as written, specifically says that it applies to any action to interpret the terms of the agreement. And the reference to a party in that particular provision talks about the prevailing party. The prevailing party in the lawsuit, not the party under the contract.

And we cited an 11th Circuit case that kind of dealt with a

similar issue that was talking about an attorney's fees provision and said, Hey, when you use the term prevailing party, you're talking about a party with the lawsuit. We're not talking about a party to the contract, especially when the -- the preparatory language to that is any action -- not any action between the parties to the contract. The provision does not say that.

And that is it, Your Honor.

THE COURT: Thank you.

MR. LIEBMAN: Thank you.

THE COURT: Mr. Wirthlin.

MR. WIRTHLIN: Thank you. And I certainly appreciate the Court's preparation. I'll be brief too.

The first point is we agree with them about 18.010(a), and they were right on that.

18.010(b), we believe that there's a basis under that for an award of the entire fees, but understand it's up to the Court's discretion, as is all the -- all of the determination of attorney' fees. I just would say, though, with respect to the block billing, that the reduction they're talking about, I think, is not supported by the case law. But even if it is, the reduction that we're -- that we would request with respect to the offer of judgment is at least 50 percent.

And on that note, plaintiff alleges that there was a lot of what they characterize as duplicative or several motions that related to the same kind of principles. But I would submit that -- I don't know that I would agree with their characterization as duplicative.

But at a minimum, those were -- and I think the record reflects -- almost entirely done, if not entirely done prior to the offer of judgment. The only thing we submitted after the offer of judgment, I believe, as far as that went, was a 60(b) motion for the first time, and the rest of the motions as the case proceeded.

So we would submit that at least from the date of that first offer of judgment, fees are appropriately awarded. Thank you.

THE COURT: Thank you.

So the Court takes under submission the motions by defendants Eliadas and tell, and the Rogich defendants, for the requests for attorney's fees. And the following is the ruling:

With regard to the Eliadas and TELD motion, clearly, they were intended third-party beneficiary. I do find they're entitled to attorney's fees.

However, I'm going to require that there be a carve-out with regard to a better explanation in the record by affidavit of counsel with regard to apportionment between the nonmoving parties and the moving parties.

I did look at the rates, the hours -- I looked at everything.

And I did find that everything was reasonable under -- and met all of the *Brunzell* factors.

But I am going to require an affidavit no later than

February 14, from Mr. Liebman or someone from his firm, going

over the apportionment issue and why it was impossible to

unapportion part of it and to apportion part of it in accordance with

your argument today.

Did you have a comment?

MR. SIMONS: And then do we get an opportunity to respond?

THE COURT: Yeah. Your response would be due by the 21st. And then it will be on my calendar for February 25th to review those and enter a Minute Order to determine whether or not the affidavit is sufficient or if the objections are going to be withheld.

MR. SIMONS: Can I ask for a longer extension to respond to that --

THE COURT: You may.

MR. SIMONS: -- because I have some other briefing that's going to be --

THE COURT: You may. Then you'll have until the 28th of February. It'll be on my calendar on the 10th of March.

March 10th, please, for my chamber's calendar.

And with regard to Mr. Wirthlin's argument with regard to the Rogich defendants, I don't find that fees are -- that you're entitled under NRS 18. But I do find under Rule 68 that based upon the offer of judgment your fees are appropriate. The offer was made in good faith. It was both in timing and amount that the fees were reasonable and justified, and that it was grossly unreasonable -- not in bad faith, but grossly unreasonable not to accept the offer.

I looked at the --

MR. SIMONS: I'm sorry. Just --

 THE COURT: Just let me finish and then I'll give you a chance.

MR. SIMONS: Okay.

THE COURT: I did look at these. I did see that there was some block billing, but there was sufficient detail that I could determine that the time was reasonably spent. The hourly rate was very low compared to the skill of the attorney. There were some redactions.

But I reviewed -- I mean, I've read all of these briefs. I didn't find that it was churning or duplicative work. I think that the work was advanced in good faith.

However, I'll need an affidavit in support with regard to an explanation of why things were redacted, and with regard to the block billing and why it was done and why you can justify that.

Again, same briefing deadline. And it's simply to supplement the record so that both sides have the ability to fully resolve the issue, since I know it will be appealed, just making sure.

And your comment, please.

MR. SIMONS: Yes. Are you concluded so I'll just have all my comments at one point in time?

THE COURT: Yeah. No. Go ahead.

MR. SIMONS: Okay. Because the appellate brief is -- the opening brief is due on March 6th. So what I'd like to do is see if I can --

MR. LIEBMAN: I believe it was suspended under the --

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third-party beneficiary under the contracts, therefore, it is bound by the attorney's fees provision within the contract.

THE COURT: That is correct.

MR. SIMONS: Okay.

THE COURT: That is correct. That -- and that should be reflected in the order, please.

MR. LIEBMAN: Understood, Your Honor.

THE COURT: And with regard to the findings I made with regard to the offer of judgment, please include those, Mr. Wirthlin --

MR. WIRTHLIN: Will do, Your Honor.

THE COURT: -- in your order as well, as well as the Brunzell factors.

MR. SIMONS: Last preemptory.

THE COURT: Sure.

MR. SIMONS: The entirety, at least the copy I received of the billing records, were redacted. So I --

THE COURT: They were redacted.

MR. SIMONS: And then you --

THE COURT: And that's why I'm requiring the affidavit. I could tell, based upon what I know, what I read in the paper, and enough from their descriptions and the time that I felt the time was justified. I am requiring them to do an affidavit with regard to the block billing and the redactions.

MR. SIMONS: The difficulty I have is I don't know how you could make that determination, because at least from the

information I saw, I looked through it, and other than the dates, essentially what my copy had is entirely redacted. But what we do know is that there was activity undertaken to refile the same motions. So that's why I'm a little bit at a disadvantage, if not a tremendous disadvantage, of not being able to challenge the duplicative nature of the invoices.

And so I just want to have an understanding of what you're asking them to disclose to the Court with regards to the activities that were undertaken in the redaction.

THE COURT: Block billing and redaction explanations of what was done during block billing --

MR. SIMONS: Okay.

THE COURT: -- what was redacted. And you'll have the ability to respond to the affidavit that's provided.

Any other questions?

MR. LIEBMAN: I don't believe so, Your Honor.

THE COURT: All right. So -- and the moving party is to prepare the orders, form to be agreed by all counsel.

Now, let's talk about costs. And I brought in the Memoranda of Costs with me this morning. And just to give you an outline of what I normally rule on costs -- that doesn't mean I won't listen to your arguments.

I normally allow all filing fees, usually reasonable messenger fees, postage, copying fees, service of process, transcript and deposition fees. I was concerned in both Memorandum of

Costs, with regard to copy charges and legal research. And that is looking first at Mr. Wirthlin's.

Let me now outline, Mr. Liebman, some of the issues I had. I don't allow parking because it's not in the statute.

MR. LIEBMAN: Understood, Your Honor.

THE COURT: And courier, only if reasonable. Photocopies have to be justified. And online legal research was wildly expensive. And keep in mind, I've been -- I haven't practiced law for 10 years, so I haven't had to pay a Westlaw bill for a law firm for 10 years. So with that in mind, I'll ask you to present your motion to retax. And then I'll hear the responses.

MR. SIMONS: If I've understood it, you've already looked over the costs and just wanted an argument on the research.

THE COURT: I looked at everything. I did. And those are the things that I had concerns -- I've kind of outlined what I had concerns with. I didn't mean to steal your thunder.

MR. SIMONS: Not at all. Clearly, the 83,000 in legal research is problematic. And I don't have anything to say to that, other than what I've already briefed.

THE COURT: Good enough.

Mr. Liebman.

MR. LIEBMAN: And obviously, legal research is under the statute, but obviously it had to be reasonable. That's up to the Court's discretion. And we would certainly agree with any decision to reduce that or not award that, if you don't believe that's

appropriate.

With respect to the copy costs, we have some internal copy costs and we have copy costs that we farmed out. That was mostly relating to the trial exhibits.

THE COURT: Right.

MR. LIEBMAN: I believe we have invoices in the Memorandum of Costs that's evidencing the trial exhibits. The copy costs internally, we printed out a report showing when they were made and when they were done for all of those internal costs.

THE COURT: I guess -- is the price per page was 20 cents, I think?

MR. LIEBMAN: I believe so.

THE COURT: Is it a profit center for your law firm?

MR. LIEBMAN: To be honest, I don't know, Your Honor, because I don't -- I certainly don't handle that aspect of the administrative process for the law firm.

THE COURT: All right.

MR. LIEBMAN: I just know --

THE COURT: And when you farm it out, what is the price-per-page cost?

MR. LIEBMAN: I do not know, Your Honor. I do not know.

I just know that a lot of times, like when we're preparing for a hearing, we put together binders internally. We don't farm that out because we usually need that on a quicker basis.

THE COURT: Right.

MR. LIEBMAN: But to be honest with you, I don't have those figures before me. I would imagine that when we farm it out, it might be a little bit less expensive. But I'm not sure, to be honest with you.

THE COURT: Right. And with regard to Westlaw, how can you -- how do you justify? I know they're actual. It's not a profit center.

MR. LIEBMAN: Mm-hmm.

THE COURT: But there are free online research services available.

MR. LIEBMAN: Yes. And to be honest with you, we actually just switched from Westlaw to Lexus to try to lessen that cost going forward.

The agreements that we have with certain clients, in this instance, is to charge those Westlaw costs directly to the client.

Some clients agree to it; some don't. In this particular case, this particular client did agree to that and was incurred for those particular costs. But if the Court believes that that amount is unreasonable, then certainly we'd be -- that's up to the discretion of the Court to reduce that particular amount or to not award it at all.

We obviously -- we incurred that to the client as a cost, and certainly we had a responsibility to include that in the Memorandum of Costs, especially since it's under the statute, but certainly leave it up to the Court's discretion to make a determination on that particular amount.

The parking you mentioned, that's certainly fine.

The courier fees, that was related to ROCs going between counsel's offices and related to bringing trial exhibits and things down here when we were set to go to trial. It might not be explicitly mentioned under the statute, but there is that catchall in Subsection 17 that talks about other costs that are necessary to the case.

I believe there was some apportionment arguments that were made. Our position on apportionment is, hey, every party prevailed. Apportionment is not really an issue at this particular point in time.

So unless the Court has any additional questions, that's all I have.

THE COURT: I don't.

Mr. Simons, do you have a -- let's take these separately, since the -- I kind of outlined it.

Your reply with regard to your Motion to Retax on TELD Eliadas.

MR. SIMONS: Correct. And keep in mind, it's the party who incurs. It's just not, hey, we all win, so we all get costs.

TELD, we know, didn't pay for anything, because all the bills were sent to Mr. Eliadas, and he didn't pay them. So we know that. We know there's an apportionment issue that's all over the place. We know that there's -- I can go through the line items, but I don't want to waste our time going through what I've said and why there's issues with -- unless you want me to -- like, the courier fees.

THE COURT: It's -- if you feel you've made your record, that's fine. But I don't want you to feel cut off. I don't want anybody to leave this courtroom and say, I didn't get a chance to present my argument.

MR. SIMONS: Well, my argument's in the written briefing. That goes up on appeal. I understand that you like to be courteous to the counsel and let them speak, but I'm not just going to regurgitate what I've already written, because I know you've looked at it.

THE COURT: Good enough.

MR. SIMONS: The research -- it's not up for the Court just to randomly pick a number. I mean, they've got an issue with how they're billing that. And that's why I brought it up with different methodologies. And you know, 83,000, that -- that'll pay for legal fees for my firm for the next 10 years. So it depends on the methodology that was employed. It has to be reasonable -- not just what they bill or what they want to charge and try to turn it into a profit center. And that's why I said, look, we have to have some more information on how you went about or what would be reasonable. Is it a transactional amount? What's a reasonable transaction amount? Or do you do it hourly? There's all different methodologies to -- for legal research.

So at this point in time, I appreciate that counsel has said, look, I'll leave it to the discretion of the Court. We've pointed out that even if the Court were to exercise discretion, what would be the

parameters? You could pick 25 percent of what they requested?
You could do that and say, look, you know, I've looked at the
potential legal fees, the research fees sent in by Rogich. I think that's
a reasonable comparison and use that. I don't know, it -- that's why
you get the discretion.

THE COURT: Good enough.

MR. SIMONS: But our opposition was that there was no basis to award [indiscernible].

THE COURT: With regard to the Motion to Retax on the Eliadas TELD, it'll be granted in part and denied in part as follows:

Filing fees are a taxable cost.

Courier services, I find to be reasonable in the premises.

With regard to the copying, I have a sufficient explanation with regard to in-house and photocopies. They did not seem unreasonable.

Postage is reasonable.

Parking is disallowed.

And with regard to online research, I'm going to reduce it by 75 percent, simply because I don't have a justification of the benefit to the prevailing parties in this case.

Pacer is allowed, and long distance is allowed.

So it's granted in part and denied in part. And Mr. Simons to prepare the order.

Now, with regard to the fees requested by the Rogich defendants, do you wish to argue your motion, Mr. Simons?

MR. SIMONS: I'm good with what's submitted.

THE COURT: Thank you.

Is there a response? It looked like it was 20 cents a page for copying, filing fees, messenger fees, postage, Secretary of State, service of process, transcripts.

The biggest issue I had was Westlaw.

MR. WIRTHLIN: Westlaw, Your Honor, yes, and just because that issue has been raised, I'll just let the Court know the way that we do that to try to keep the fees down as much as possible is I personally use Fastcase through the State Bar web site, because it's free to do almost all of my research.

I do, however -- they don't -- Fastcase, I don't think has a reliable Shepardization function, and so I do have the look up the case, and occasionally do a little bit of research on that. Through Westlaw, because I don't know -- I do try to Google -- Google Scholar, I think, has cases I can find. And so I do all of those that I can for free, and then only go to Westlaw when it's absolutely necessary. But sometimes it is just to make sure the case law is good. So that's the entirety of what I use Westlaw for.

I can't speak to other folks, but I think that was pretty much mostly what was incurred there.

As far as the copy charges, yeah, that's pretty much the exact same thing that Mr. Liebman said. Binders we do in-house. But because we had to be ready to go to trial on that first day, we had to get everything prepared. And we had the farm that out and

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they charge what they charge. And frankly, we don't have much of a choice to pay it. So that was --

Unless the Court has any for the questions, that's --

THE COURT: I don't.

MR. WIRTHLIN: Okay.

THE COURT: Your response, please.

MR. SIMONS: Yes. Again, there's -- we raised, as one of the issues, apportionment for both costs -- both in the Eliadas TELD context and now in this context. And I'm assuming you're going to say, given what you told me on the Eliadas TELD, that there's no apportionment analysis, so that the award will go to the requesting parties.

And other than that, that was primarily for clarification, because I don't necessarily need to argue, because you know what the detail is on each of the costs that we were objecting to.

THE COURT: Okay. With regard to the Motion to Retax the Rogich defendants, it's going to be denied, the Motion to Retax.

The costs will be awardable only to the requesting parties.

I'm fine with the copying charges. They have been justified.

Filing fees are justified.

Messenger fees are justified.

Postage, justified.

Secretary of State copy of records, justified.

Service of process, transcripts.

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And then I have a sufficient explanation with regard to the Westlaw expenses, and they're significantly less, even though the Rogich parties were in the case much longer and had the laboring or -- of defense.

So for that reason, it's denied.

Mr. Wirthlin to prepare the order. Mr. Simons to approve the form of that.

All right. Anything else to take up today?

MR. LIEBMAN: I don't believe so, Your Honor.

MR. SIMONS: No, Your Honor.

THE COURT: So let's talk about how the case will move forward. I assume you're going to continue to stay everything, pending the appeal?

MR. LIEBMAN: Yes, Your Honor. I believe these fee awards and cost awards will eventually be wrapped into the appeal.

And we'll go forward with the appeal and see what happens.

THE COURT: Good enough.

MR. SIMONS: There should be nothing before this Court of any more substance, other than this additional --

MR. LIEBMAN: Briefing --

MR. SIMONS: -- post briefing that we will address.

THE COURT: Right.

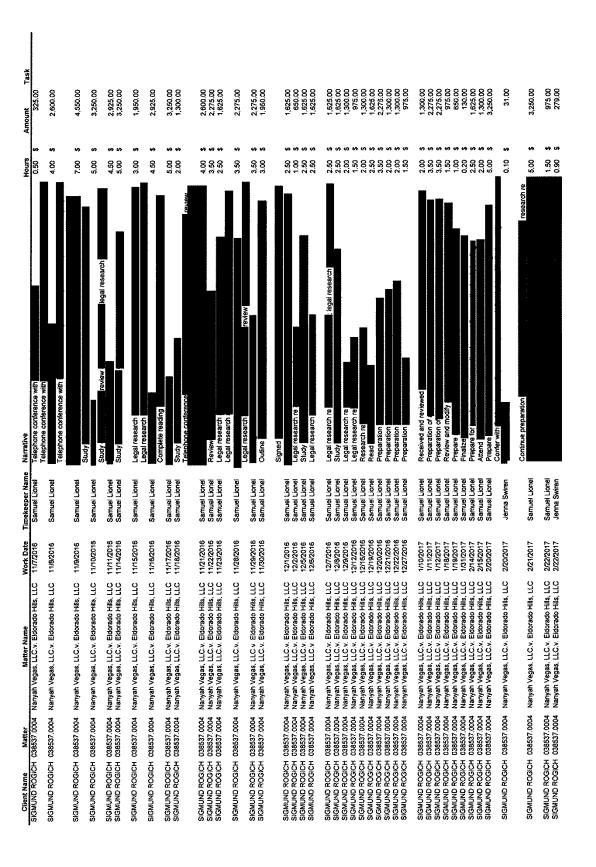
MR. SIMONS: And then once we get a concluding order from you --

THE COURT: Right.

1	MR. SIMONS: we'll appeal that. And that'll be
2	consolidated into the master appeal.
3	THE COURT: Okay. So I'm just trying to see what kind of
4	case management you may need, so you guys will let me know
5	when it's time for me to step back.
6	MR. SIMONS: Back into? Become involved again?
7	THE COURT: Back into this one.
8	MR. LIEBMAN: Yes, Your Honor.
9	THE COURT: The remaining issues?
10	MR. LIEBMAN: Yes, Your Honor.
11	MR. WIRTHLIN: Yes, Your Honor.
12	THE COURT: All right. Then thank you all.
13	MR. SIMONS: Okay.
14	MR. LIEBMAN: Thank you, Your Honor.
15	MR. WIRTHLIN: Thank you.
16	[Proceeding concluded at 11:39 a.m.]
17	* * * * *
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19	ATTEST: I do hereby certify that I have truly and correctly
20	transcribed the audio/video proceedings in the above-entitled case to the best of my ability.
21	1 - Malall.
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24	Independent Transcriber CERT**D-323 AZ-Accurate Transcription Service, LLC
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### EXHIBIT 2

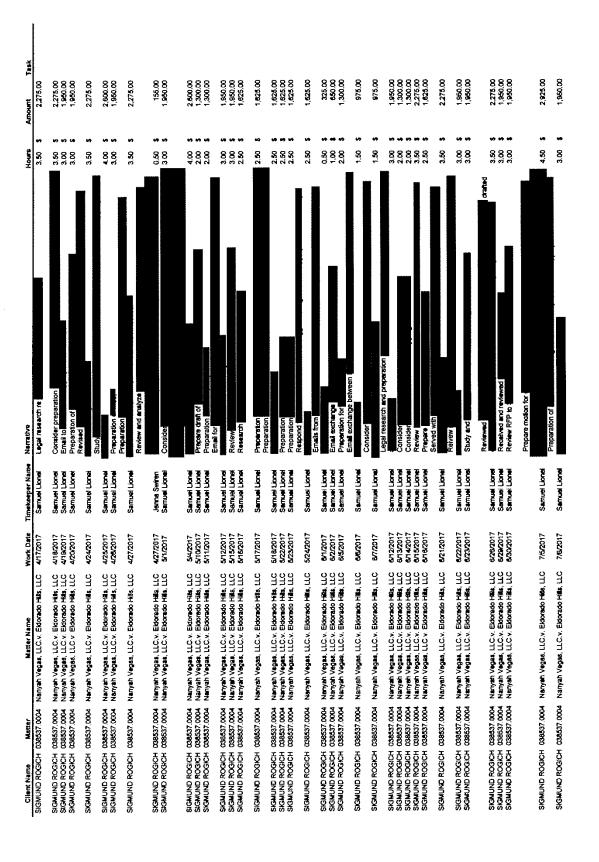
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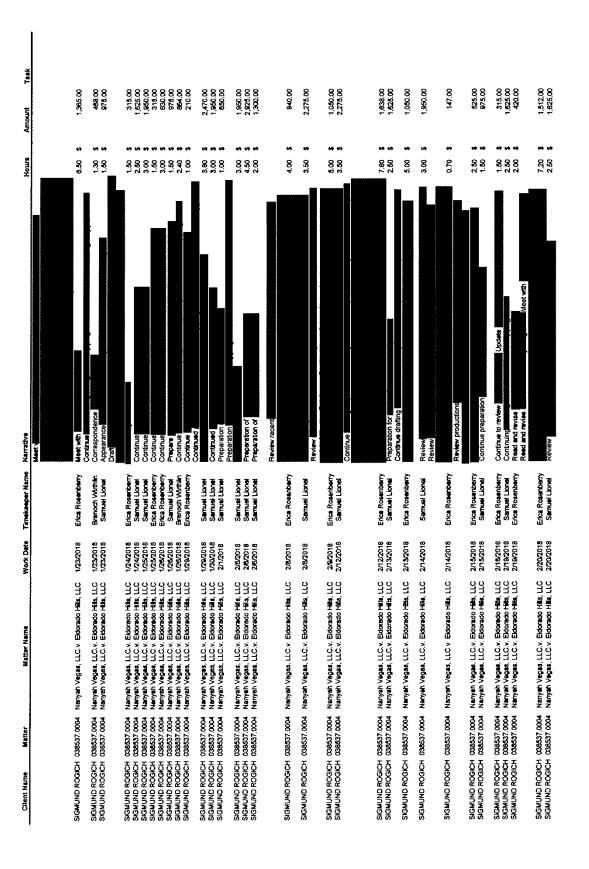
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Name of August, LLC. Education Halt, LLC. Halt Halt Halt Halt Halt Halt Halt Halt		Veryah Vegas, LLC.v. Eldorado Hita, LLC Veryah Vegas, LLC.v. Eldorado Hita, LLC Veryah Vegas, LLC.v. Eldorado Hita, LLC	1027/2017 1027/2017 1027/2017		Continue to ( Review Serview Parading Se		800.00 850.00 241.50
Name of Maryan Vagas, LIC. Electrach Hist. LC.         Final Robandon Plat. LC.         Continue to defilt.         Continue to defilt.         Continue to defilt.         5.50 S           Name of Vagas, LIC. Electrach Hist. LC.         1001/2077         Sermat LOW Electrach Hist. LC.         1001/2077         Servach Workship. Mixton Inches to the Low Electrach Hist. LC.         11/1/2077         Servach Workship. Mixton Inches to the Low Electrach Hist. LC.         11/1/2077         Servach Workship. Mixton Inches to the Low Electrach Hist. LC.         11/1/2077         Servach Workship. Mixton Inches to the Low Electrach Hist. LC.         11/1/2077         Servach Workship. Mixton Inches to the Low Electrach Hist. LC.         11/1/2077         Servach LOW		Manyah Vegas, LLC.v. Eldorado Hila, LLC Manyah Vegas, LLC.v. Eldorado Hila, LLC	10302017		Meeting with meeting with meeting with meeting with meeting me		1,104.00
Namyer) Vegat, LLC.v. Electrado Hile, LLC   1001/2017   Servach Whyther   Vegat, LLC.v. Electrado Hile, LLC   1001/2017   Servach Whyther   Vegat, LLC.v. Electrado Hile, LLC   1001/2017   Servach Whyther   Vegat, LLC.v. Electrado Hile, LLC   1101/2017   Servach Hile, LC   1101/2017   Servach Hile,		Veryen Vegas, LLC.v. Edorado Hits, LLC Veryen Vegas, LLC.v. Edorado Hits, LLC	10/30/2017		Confinue to draft (1 Review of ### Confinue to (		1,040,00 3,575,00
Namysh Vegas, LLC. V. Elocrado Hist, LLC. V.	038537.0004 038537.0004 038537.0004	Narryah Vegas, LLC.v. Eldorado Hills, LLC Narryah Vegas, LLC.v. Eldorado Hills, LLC Narryah Vegas, LLC.v. Eldorado Hills, LLC	10/31/2017 10/31/2017 11/1/2017		egal research regarding a Work on tasues related to	7.30 2.10 6.40 8	1,480.00 724.50 138.00
Narryah Vegas, LLC.v. Eldorado Hils, LLC         11/2/2017         Samuel Lonel         Conformat research registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the samuel Lonel         Review pleadings fred in growth registrate or the sam		Nanyah Vegas, ELC.v. Ekonado Hills, LLC. Nanyah Vegas, ELC.v. Ekonado Hills, LLC.	11/1/2017	-	rover. Review pleadings		600.00
Namyah Vegas, LLC.v. Eldorado Hills, LLC         11/7/2017         Samuel Llonel         Review pleadings fled in (         2.50         3.00         3.10         4.20         3.00         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         4.20         8.00		Narryah Vegas, LLC.v. Edorado HRs, LLC. Narrash Vanes 11 C. d. Edwards HRs. 11 C.	11/2/2017		Légal research re s Continue researching v		1,300.00
Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/7/2017         Erica Rosenberry         Review pleadings fied in 4         8.30 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Erica Rosenberry         Maeting with         6.30 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Brenoch Wirthin         Conference with         3.00 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Erica Rosenberry         Revise         4.20 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Erica Rosenberry         Revise         4.20 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Erica Rosenberry         Revise         4.20 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/8/2017         Samuel Lone         Revise         1         4.20 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/10/2017         Samuel Lone         Revise         1         4.20 \$         1           Naryah Vegas, LLC.v. Eldorado Hils, LLC         11/10/2017         Samuel Lone         Revise         1         4.20 \$         1		Narryah Vegas, LLC.v. Ekforado H謂s, LLC	11/6/2017	1	Construed review of Review emails		1,950.00
Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/8/2017         Erica Rosenberry         Meeding with         Meeding with         3.90         \$         1           Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/8/2017         Semuel Lichel         Meeding with         3.90         \$         1           Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/8/2017         Erica Rosenberry         Revise         4.20         \$           Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/8/2017         Erica Rosenberry         Revise         3.00         \$           Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/8/2017         Samuel Lichel         Revise         3.00         \$           Nanyah Vegas, LLC.v. Ekorado Hils, LLC         11/10/2017         Samuel Lichel         Samuel Lichel         2.20         \$		Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	11/7/2017		Review preadings fied in (		1,525.00
Samuel Lone    West with   3.00 \$   1		Nanyah Vegas, LLC.v. Eldorado Hils, LLC			Aleesing with		1,280.00
Erica Rosenberry Revise 3.00 \$  Samuel Librat Revise 3.00 \$  Erica Rosenberry Meet Will 2.80 \$  Samuel Librat Review 3.00 \$  Samuel Librat Review 3.00 \$		Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldonado Hills, LLC	11/8/2017		Conference with Mac with I		1,345.50
038537,0004 Narrysh Vegas, LLC.v. Elocrado Hite, LLC 11/10/2017 Erica Roserberry Meet will 2008 S		Nanyah Vegas, LLC.v. Eldorado Hille, LLC	11/8/2017		Ravise		840.00
Samuel Lionel Review	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/9/2017		Weet will Precaration of		1,950.00 520.00
	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/10/2017		Review		3,250.00

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Clent Name M	Matter	Matter Name	Work Date	Timekeeper Name Narrative	Narrative	Kours	Amount	Task
					Confine to			
SIGMUND RCGICH 0385	537.0004	SIGMUND RCGICH 036537,0004 Nanyah Vegaa, LLC.V. Extorado Hills, LLC	12/1/2017	Erica Rosenberry	Reviser	2.50 \$	1,500.00	9
SIGMUND RCOXCH 036537.0004		Nanyah Vegas, LLC.v. Edorado Hille, LLC	124/2017	Semuel Lional	Continue to Research	2.00 \$	1,300.00	0
SYGMEUND REGICH 038537.0004		Nanyah Vegas, LLC.v. Eldonado Hills, LLC	12/4/2017	Erica Rosenberry		8,00	1,800,00	9
SKGMUND ROCKCH 0386	537.0004	SIGMUND ROCKCH 028557 0004 Naryan Vegas, LLC v. Eldoredo Hils, LLC	12/5/2017	Samuel Lional	Telephone conference with compare Continue to Phone Continue to Review ( Phone Coll to E	8.	2,600.00	9
SIGMUND ROCKCH 0386	537.0004	SIGMUND ROGICH 008537,0004 Nanyah Vagas, LLC.v. Eldonado Háts, LLC	12/5/2017	Erica Rosenberry	Continue to review	\$ 230 \$	1,460.00	9
SIGMUND ROGICH 038537,0004	537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	12/8/2017	Erica Rosanberry	Phone call Continue to review	3.70 \$	740.00	2
SIGMUND ROCKCH 0386	537.0004	SKGMUND ROGICH 638537,0004 Nanyah Vegas, LLC.v. Eldorado Hils, LLC	12/7/2017	Erica Rosenberry	Prone call with	3.50 \$	700.00	9
SIGMUND ROGICH 038637,0004	637,0004	Nanyah Vegas, LLC.v. Edorado Hills, LLC	12/7/2017	Samuel Lionel	Continue to partial	200 \$	1,300.00	Q
SIGMUND ROGICH 038537,0004	537,0004	Nanyah Vegas, LLC.v. Edorado Hills, LLC	12/8/2017	Erica Rosenberry		4.50	900:00	2
SKGMUND ROGICH 038537,0004	637.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/11/2017	Erica Rosenberry		6.00 6.00	1,200.00	2
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004	5537,0004	Naryah Vegas, LLC.v. Erkorado Hilis, LLC Naryah Vegas, LLC.v. Erkorado Hilis, LLC	12/12/2017	Erica Rosenberry Semuel Lional	Review   Continue to review	3.00 \$	1,950.00	88
SIGMUND ROCKCH 028537,0004 SIGMUND ROCKCH 028537,0004	537.0004 1537.0004	Namysh Vegas, LLC.v. Edorado Hils, LLC Namysh Vegas, LLC.v. Edorado Hils, LLC	12/13/2017	Erica Rosemberry Samuel Lional	Preparation for Controls to f	8.00 3.50 \$	1,600.00	88
SIGMUND ROGICH 038537,0004	337,0004	Nanyah Vegas, LLC.v. Eldorado Hita, LLC	12/14/2017	Erica Rosenberry		7.00 \$	1,400.00	8
SIGMUND ROGICH 038637,0004	1637,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/15/2017	Samuel Library	Attendance et	4.00	2,600.00	2
					Continue to			
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	3537.0004	Nerryah Veges, LLC.v. Eldorado Hits, LLC Nanyah Veges, LLC.v. Eldorado Hits, LLC	12/15/2017	Erica Rosenberry Brenoch Wittilin	Work on and	7.60	1,500.00	88
					Continue to review			
SIGMUND ROGICH (038)	9537.0004	SIGMUND ROSICH 038537,0004 Naryah Vegas, L.C.y., Eldorado Hills, L.C. 12/19/2017	12/18/2017	Erica Rosenberry		8.8	1,600.00	8

Cilent Name	Matter	Matter Name	Work Date	Timekeeper Name	Narrative	Hours	Amount	Task
SIGMUND ROGICH 038537.0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/18/2017	Summer Lonel	Review	4:00 \$	2,600,00	
SIGMUND ROCICH 038537,0004 SIGMUND ROCICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Ektorado Hëts, LLC Nanyah Vegas, LLC.v. Ektorado Hëts, LLC	12/19/2017	Erica Rosenberry Semuel Lional	Prepare for Continue to	8.00 8.00 8.00 8.00	1,600.00	
SIGMUND ROGICH 038537,0004		Nanyah Yagas, LLC.v. Eldorado Hils, LLC	12/20/2017	Erica Rosamberry	Continue to review	2 00 2	1,400.00	
SIGMUND ROGICH	038537.0004	SIGMUND RODICH 038537,0004 Namyah Vagas, LLC.v. Eldorado Hals, LLC.	12/21/2017	Erica Rosenberry	Continue to review	5.30	1,080.00	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vagas, LLC.v. Ekorado Hilk, LLC Nanyah Vagas, LLC.v. Ekorado Hilk, LLC	12/28/2017	Erica Rosenberry	Continue to review	\$.00 \$.	1,000.00	
SIGMUND RODICH ( SIGMUND RODICH ( SIGMUND RODICH ( SIGMUND ROGICH (	038637,0004 038537,0004 038537,0004	Nanyah Vegas, LLC v. Ekonato Hils, LLC Nanyah Vegas, LLC v. Ekonato Hils, LLC Nanyah Vegas, LLC v. Ekonato Hils, LLC Nanyah Vegas, LLC v. Ekonato Hils, LLC	12/27/2017 12/28/2017 12/28/2017 1/2/2018	Erica Rosanberry Samuel Licnel Samuel Licnel Samuel Licnel	Form and request Review	28.4.4.4.00 28.4.4.4.00 28.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4	1,100.00 2,925.00 2,990.00 2,900.00	
SKAMUND ROGICH 038537,0004 SKAMUND ROGICH 038537,0004 SKAMUND ROGICH 038537,0004	038537,0004	Neryth Veges, LLC.v. Eldorado Hila, LLC Neryth Veges, LLC.v. Eldorado Hila, LLC Nerwth Veges, LLC.v. Edorado Hila, LLC Nerwth Veges, LLC.v. Edorado Hils, LLC	1/2/2018	Erica Rosenberry Brenoch Wirthlin Serruel Lional	Prepare Work on research Review	8.00 S	840.00 108.00 2.275.00	
SIGMUND ROCKCH	038537,0004	Naryah Vagas, LLC.v. Eld	1/3/2018	Erica Rosanbarry	Confirms to review			_
SIGMUND ROCICH 038637,0004 SIGMUND ROCICH 038537,0004 SIGMUND ROCICH 038537,0004 SIGMUND ROCICH 038537,0004	038637.0004 038537.0004 038537.0004	Nerysh Vegas, L.C.v. Edotedo Hile, L.C. Nerysh Vegas, L.C.v. Edotedo Hils, L.C. Nerysh Vegas, L.C.v. Edotedo Hils, L.C. Nerysh Vegas, L.C.v. Edotedo Hils, L.C.	14/2018 14/2018 1/8/2018	Efca Rosenberry Samuel Lional Samuel Lional Samoon Witthlin	Review (Imeet Proporation (Imeet Work on Imeet I	6.0 8.0 8.0 8.0 8.0 8.0 8.0 8.0 8.0 8.0	1,050.00 1,2275.00 1,860.00 144.00	

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SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC

SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC

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SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eidorado Hills, LLC 3/22/2018

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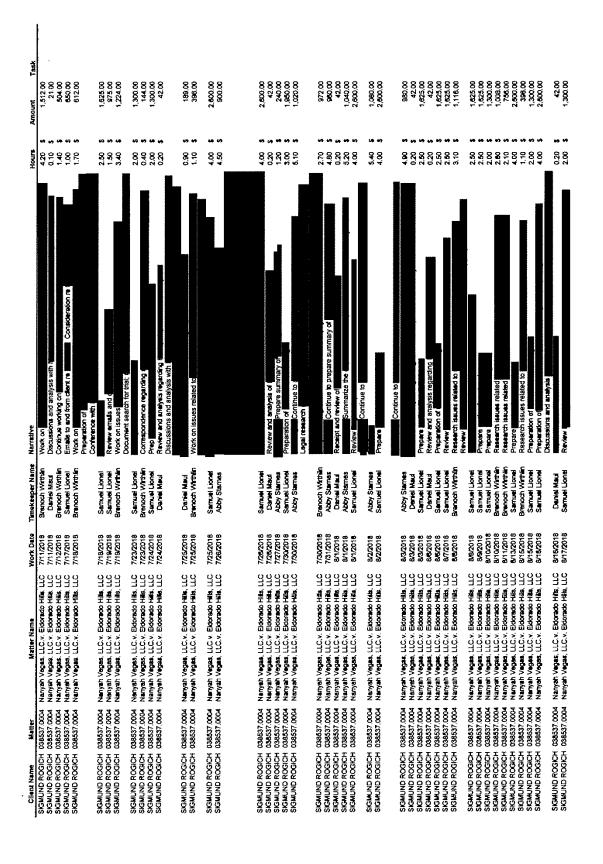
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Client Name	Matter	Matter Name	Work Date	Timekeeper Name	Narrative	Hours	Amount T	Task
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/23/2018	Brenoch Wirthlin	Work on reviewing	1.30 \$	468,00	
					Preparation of			
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/23/2018	Samuel Lionel	Windern	5.00.5	3,250.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004	Nanyah Vegas, L.C.v. Eldorado Hills, L.C. Nanyah Vegas, L.C.v. Eldorado Hills, L.C. Nanyah Vegas, L.C.v. Eldorado Hills, L.C.	4/24/2018 4/24/2018 4/24/2018	Brenoch Withlin Samuel Lionel Daniel Maul	,	1.10 \$ 3.50 \$ 0.30 \$	396.00 2,275.00 63.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC v. Eldorado Hills, LLC Nanyah Vegas, LLC v. Eldorado Hills, LLC	4/25/2018 4/25/2018	Brenoch Wirthlin Samuel Lionel		1.30 \$	468.00 975.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	4/26/2018 4/26/2018 4/27/2018	Brenoch Wirthlin Samuel Lionel Samuel Lionel	Read preparation of the committee of the	1.10 \$ 3.00 \$ 0.50 \$	396.00 1,950.00 325.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC	4/30/2018 4/30/2018 5/2/2018 5/3/2018	Brenoch Withlin Samuel Lionel Samuel Lionel Samuel Lionel	d nałysis	2.50 3.00 3.00 3.00 3.00 3.00 3.00 3.00 3	504.00 1,950.00 3,575.00 1,625.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	5/4/2018 5/4/2018	Daniel Mauf Samuel Lionel	Preparation of Taleshoods with	0.60 \$	126.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eidorado Hills, LLC	5/7/2018	Samuel Lionel	Telephone conference	3.50 \$	2,275.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	5/7/2018 5/7/2018	Daniel Maul Brenoch Wirthlin	Work on issues related to Work on issues related to	0.20 \$ 0.40 \$	42.00	
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2018	Brenoch Wirthlin	Commune teasing	2.10 \$	756.00	
SIGMUND ROGICH 038537.0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2018	Samuel Lionel	Contine to a techning.	5.00.3	3,250.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eidorado Hills, LLC	5/9/2018	Brenoch Wirthlin	Preparation for	2.10 \$	756.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/9/2018	Samuel Lionel	Deri issining and analysis	4.50 \$	2,925.00	
SIGMUND ROGICH	038537,0004		5/10/2018	Daniel Maul	Description and the second and the s		21.00	
SIGMUND ROGICH SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/10/2018 5/10/2018	Brenoch Wirthlin Samuel Lionel	Preparation of Review reterent	3.10 2.00 <b>\$</b>	1,116.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/11/2018	Brenoch Wirthlin	יייייייייייייייייייייייייייייייייייייי	1.10 \$	396.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/14/2018 5/16/2018	Samuel Lionel Samuel Lionel	Review Preparation of	3.00 s	2,600.00	
SIGMUND ROGICH (	138537,0004 138537,0004 138537,0004 138537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	5/17/2018 5/17/2018 5/18/2018 5/21/2018 5/21/2018	Samuel Lionel Daniel Mauf Samuel Lionel Daniel Mauf Samuel Lionet	Appearance in l Gather Review Continue preparing Conference with	- 4.50 0.70 0.80 0.00 0.00 0.00 0.00	2,925.00 147.00 2,275.00 924.00 3,900.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eidorado Hills, LLC Nanyah Vegas, LLC.v. Eidorado Hills, LLC Nanyah Venas, LLC.v. Eidorado Hills, LLC	5/22/2018 5/22/2018 5/23/2018	Daniel Maul Samuel Lionel	Research and analysis regarding Prepare I	0.10	21.00	
SIGMUND ROGICH	038537.0004		5/24/2018	Samuel Lionel	Altendance &	9 69 6 69 6 69	3,250.00	

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Client Name M.		- 1	- 1	Timekeeper Name Narrative	Narretive	Hours	Amount Task	
SKGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004		Naryah Vegas, LLC.v. Eldorado Hills, LLC Naryah Vegas, LLC.v. Eldorado Hills, LLC	8/17/2018 8/20/2018	Brenoch Wirthân Daniel Maus	Research Review and enaysta of Review Wolcean	1.10 \$ 0.20 \$	396.00 42.00	
SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	8/20/2018	Samuel Lional		4.50 \$	2,926.00	
SIGMUND ROGICH 0385	038537,0004	Nanyah Vegas, LLC.v. Edorado Hills, LLC	8/21/2018	Samuel Lionel	Review	2.50 \$	1,625,00	
SKGMUND ROGICH 0385 SKGMUND ROGICH 0365	038537,0004	Nanyah Vegas, LLC.v. Extorado Hilbs, LLC Nanyah Vegas, LLC.v. Extorado Hilbs, LLC	8/22/2018 8/22/2018	Samuel Llonel Brenoch Wirthin	Complete review and study Comblete review and study Comblete researching issues Review prosearching issues	3.00	1,950.00	
SIGMUND ROGICH 038537,0004		Eldorado Hills,	8/23/2018	Samuel Llonel	Very	3,80	1,170.00	
SIGMUND ROGICH 038537		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	8/24/2018	Samuel Llone:		3.00	1,950.00	
MUND ROGICH 0385	038537,0004	Nanyah Vapas, LLC.v. Eldorado Hills, LLC	82242018	Daniel Mars	Review and analysis		42.00	
		Nativative Vegas, LLC.V. Elocado mas, LLC.	8/2//2018		Keview		1,850.00	
A WIND ROCKH MAN		Negligible Vegas, CLC. v. COOR and Chief LLC.	042042010	Some Long		3 8	00000	
AUND ROGICH 0385		Nerveh Veces, LLC.v. Eldorado Hills LLC	8/30/2018	Survey local	Redies		00.030	
AUND ROGICH 0385		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	8/31/2018	Samuel Lionel	Review	90.5	1,950.00	
	_	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9/3/2018	Brenoch Wirthin	Continue		180.00	
SIGMUND ROGICH 0385		Nanyah Vegas, I.L.v. Eldorado Hills, I.L.C.	8/4/2018	Brenoch Wirthin	Continue		504.00	
SIGMUND ROGICH 0385 SIGMUND ROGICH 0385	038537,0004	Nanyah Vegas, LLC.v. Eldonado Hitis, LLC Nanyah Vegas, LLC.v. Eldonado Hitis, LLC	9/5/2018 9/6/2018	Brenoch Within Brenoch Within	Continue	2.80 2.40 5.40	288:00 864:00	
SIGMUND ROGICH 0365	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9772018	Brenoch Wirthlin	Continue	3.10 \$	1,116.00	
SIGMUND ROGICH 038637,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9/8/2018	Branoch Wirthlin		5.80	2,068.00	
					Continue			
MUND ROGICH 0385	537.0004	SKSMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eldcrado Hita, LLC	9/11/2018	Brenoch Wirthlin		2.30 \$	828.00	
MUND ROGICH 0386	637.0004	SIGMUND ROCKICH 038697,0004 Naryah Vegas, LLC.v. Eldonado HRs, LLC	9/12/2018	Brenoch Wirthlin	Continue	8.	468.00	
					Continue			
SIGMUND ROGICH 0385	038537,0004	Nanyah Vegas, LLC.v. Eldonado Hills, LLC	8/13/2018	Branoch Wirthlin		₹ 8	432.00	
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SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9/15/2018	Brenoch Within		1.10	396.00	
	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC. Nanyah Vanda LLC.v. Eldorado Lilla LLC.	9/17/2018	Samuel Lionel	Prepare and the	88		
SIGMUND ROGICH 038	038537,0004	Nerveh Vedes LLCv Eldward Hills LLC	924/2018	Series   journal	Proposition for	3 5	•	
		Namyah Vagas, LLC.v. Eldorado Hills, LLC	9/25/2018	Samuel Lionel	Preparation for		•	
		Nanyah Vagas, LLC.v. Eldorado Hills, LLC	9/28/2018	Stenoch Wirthlin	Prepare for			
	038637,0004	Narrysh Veges, LLC.v. Externato Hills, LLC Narrysh Veces, LLC.v. Externato Hills, LLC	9/26/2018 9/7/7/2018	Samuel Lionel	Preparation for	0.00	•	
		Transfer I agent Cook and Cook			Review relevant documents a			
SIGNUND ROGICH 6382	038537,0004	Nanyah Vegas, LLC.v. Eldonado Hills, LLC	9/27/2018	Brenoch Wirthlin	Review			
		Nervah Vegas, LLC.v. Edorado Hills, LLC.	9/28/2018	Samuel Donel	Review the file of the common	3 S 3 S	975.00	
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	10/1/2018	Brenoch Wirthlin Samuel Lionel	Preparation	2.50 2.50 3.50 5.00	900.00	

Client Name	Matter	Matter Name	Work Date	Timekeeper Name	Nextative	Hours	Amount	Task
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		National Value 11 C. Standard High LLC	4000000	Comiss track		3 5	2000	
		INDIGATE VALUES, LLC.V. CIUMIDAU FIRE, LLC.	0100000				2000	
SO HOSOCA CASTAGAS		Natival Veges, LLC.V. Excelled Files, LLC. Natival Veges, LLC.V. Excelled File LLC	1032018	Control Mari	Programme and the second secon	3 5	80.00	
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	038537.0004	Naryah Vegas, LLC.V. Eldorado Hilla, LLC. Naryah Vegas, 17.0 V. Eldorado Hilla, 17.0	10/3/2018	Seminal Lond	Review door ment	8 5	1625.00	
SIGMUND ROGICH OF		Narrysh Vegas, LLC.v. Eldorado Hills, LLC	10/4/2018	Brenoch Wethlin	Work on	S. S.	160.00	
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		Naryan Vegas, LLC.V. Exposado Min, LLC.	1000001	ENGLOCH WILDER	Review and analysis regarding		W.SO#	
		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	10/5/2018	Deniel Mau			45.00	
SKGMUND ROGICH OX	038637.0004	Naryah Vegas, LLC.v. Eldorado Hills, LLC	10/5/2018	Samuel Llonel	Preparation for Continue working on	* 8. •	1,300.00	
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O CONTROLOR CALLANDA		National Vegets, LLC.V. Exchange miss, LLC.	100000	Brancoch Martin	Codes to responsible	2 40	8 8	
SIGNUND ROBOT			10/8/2018	Samuel Lionel			2.275.00	
SKIMUND ROGICH &		Nanyah Veges, LLC.v. Eldorado Hills, LLC	10,9/2018	Samuel Llonel	Preparation for		1,300,00	
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SIGNAUND ROOKCH O	038537.0004	Nanyan Vegas, LLC.V. Eloonado Hita, LLC	102/2018	Brand Planat	Safargore with Continue working on research		800/	
SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	10/9/2018	Brenoch Wirthin		2.50	900.00	
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SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hilla, LLC	10/10/2018	Daniel Mauf	LANCTHAN IN End of takyols will	1.00	210.00	
SIGMUND ROCKCH O	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	10/10/2018	Brenoch Wirthlin	Attentions	2.20	792.00	
SIGMUND ROGICH 0	038537.0004	Nenysh Vegas, LLC.v. Eldorado Hills, LLC	10/10/2018	Samuel Lionel		3.00	1,850.00	
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SCHOOL ROSECTE OF COLUMN STATES	038537,0004	Menyeh Vegas, LLC.v. El Menyeh Vegas, LLC.v. El	10/11/2018	Carried Metal	Premional Cont	8 8	1,155.00	
SIGNUND ROGICH O		Nanyah Vegas, L.C.v. Eldorado Hila, L.C.	10/11/2018	Brenoch Wirthan	Work on	2.2	9000	
C HOROCA CIN MORS	118517 0004		10/12/2018	Branch Within	Strateou	8	4044.00	
SKGMUND ROGICH O	038537.0004	Narryah Vegas, LLC.v. Edorado Hike, LLC	10/12/2018	Samuel Lionel	on the second	8	2,600.00	
SIGMUND ROGICH 0	038537,0004	Namen Vesse, LLC.v. Eldorado Hills. LLC	10/12/2018	Daniel Meu		3.00	630,00	
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SIGMUND ROGICH O	038537,0004	Namyah Vegas, LLC.v. Eldorado Hills, LLC	10/15/2018	Daniel Maul		090	106.00	
SIGMUND ROGICH O	138537.0004		10/15/2018	Samuel Lionel	Preparation for Work on leasanch	8.	2,600.00	
SIGMUND ROGICH C	38537,0004		10/15/2018	Brenoch Wirthlin			1,260,00	
SKAMUND ROGICH O	038537.0004	Namyah Vegas, LLC.v. Ekkonado Hills, LLC	10/15/2018	Daniel Maul	Coordinate dockwing of	0.20	42.00	
SIGMUND ROGICH	038537,0004		10/16/2018	Daniel Maul			861.00	
SIGNICIA DE CONTROLE	038537,0004		10/16/2018	Semuel Lionel Preport Withth	Preparation for Confine answer/bio	8.5	1,950.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	10/17/2018	Samuel Lionel	Preparation for	200	1,300.00	

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Hours Amount Task	1,50 \$ 975.00 0.20 \$ 42.00 1,50 \$ 975.00	<b>ዏ</b> ዏ ዏ ዏ	1,30 \$ 468,00 1,50 \$ 222,00 1,50 \$ 275,00 0,50 \$ 105,00 0,20 \$ 42,00 1,10 \$ 366,00 4,00 \$ 2,800,00 3,00 \$ 1,950,00	3.00 s 1,950.00	0.20 \$ 42.00 0.20 \$ 42.00 4.00 \$ 2.600.00 0.20 \$ 42.00		2.50 \$ 1,625.00 2.50 \$ 1,625.00 2.80 \$ 1,008.00 1.50 \$ 975.00	3.00 \$ 1,950.00 2.80 \$ 1,008.00	3.00 \$ 1,950.00 2.40 \$ 864.00 2.40 \$ 756.00 0.20 \$ 44.00 0.20 \$ 1,355.00 0.20 \$ 14.00 0.20 \$ 44.00 0.20 \$ 44.00
Narrative	Preparation for III. Meeting with: Legal research re	Review and analysis regarding d Review and analysis	Work on issues related to Prepare initial draft of Legal research Meeting with Review and analysis regarding Review and analysis regarding Prepare for drafting of Prepare for or drafting of	Review Research	Review and analysis Review	Review and analysis regarding a Review and analysis of Discussions and analysis regarding Conference with Research regarding:	Review II Research various Legal research	Review & Research various issues Review	Legal if Research regarding Research regarding Review and analysis regarding Review and analysis regarding Continued review of Receipt and review of Medition with Exchange emails with Setulo 80 xtile froir
Timekeeper Name	Samuel Lionel Daniel Maul Samuel Lionei	Daniel Maus Daniel Maus Brenoch Wirthlin Daniel Maus	Brenoch Wurdfun Daniel Maul Samuel Lönel Daniel Maul Daniel Maul Brenoch Withilin Samuel Lionel Samuel Lionel	Samuel Lionel Brenoch Wirthlin	Daniet Maul Caniet Maul Samuet Lionel Daniet Maut	an an	Samuel Lionel Samuel Lionel Brenoch Wirthlin Samuel Lionel	Samuel Lionel Brenoch Wirthlin	Samuel Lonel Samuel Lonel Brenoch Wirthlin Samuel Lonel Daniel Maul Samuel Lonel Tom Fell Daniel Maul Brenoch Wirthlin Daniel Maul Daniel Maul Daniel Maul
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Matter Name	Nanyah Vegas, LLC v. Eldorado Hills, LLC Nanyah Vegas, LLC v. Eldorado Hills, LLC Nanyah Vegas, LLC v. Eldorado Hills, LLC	Naryah Vegas, LLC.v. Eidorado Hilis, LLC Naryah Vegas, L	Manyal Vegas, LLC. Eldorado Hils, LLC Nanyal Vegas, LLC. Eldorado Hills, LLC Nanyal	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC.	Naryah Vegas, LLC v. Eldorado Hils, LLC Naryah Vegas, LLC. v. Eldorado Hils, LLC Naryah Vegas, LLC. v. Eldorado Hils, LLC Naryah Vegas, LLC v. Eldorado Hils, LLC Naryah Vegas, LLC v. Eldorado Hils, LLC Naryah Vegas, LLC v. Eldorado Hils, LLC	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Edorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	Nanyah Vagas, LLC.v. Ekorado Hils, LLC
Matter	038537.0004 038537.0004 038537.0004	38537,0004 38537,0004 38537,0004 38537,0004	38537,0004 38537,0004 38537,0004 38537,0004 38537,0004 38537,0004 38537,0004 38537,0004	038537.0004	038537,0004 038537,0004 038537,0004 038537,0004	38537.0004 38537.0004 38537.0004 38537.0004 338537.0004	038537,0004 038537,0004 038537,0004 038537,0004		38537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004
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Client Name	Matter	Matter Name	Work Date	Timekeeper Name	Narrative	Hours	Amount	Task
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SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1/11/2019	Brenoch Wirthân		4.40 \$	1,672.00	
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	038537,0004 038537,0004 038537,0004	Naryah Vegas, L.C.v. Eldorado Hiss, LLC Naryah Vegas, L.C.v. Eldorado Hiss, LLC Naryah Vegas, L.C.v. Eldorado Hiss, L.LC	1/14/2019 1/14/2019 1/15/2019	Daniel Meuß Samuel Lichnel Daniel Mauß	Meeting with Review Review analysis with	2.50 s 0.20 s	550.00 975.00 44.00	
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	038537,0004	Nanyah Vegas, LLC.v. Ekkirado Hils, LLC Nanyah Vegas, LLC.v. Ekkirado Hils, LLC	1/16/2019	Daniel Maul Semuel Lionel	Review Pierresione and analysis with 6	120	284.00 975.00	
SKAMUND RODICH 088537.0004 SKAMUND RODICH 038637.0004 SKAMUND ROCICH 038637.0004 SIGMUND ROCICH 038637.0004	038537,0004 038537,0004 038537,0004 038537,0004	Naryah Vagas, LLC.v. Ekorado Hisi, LLC Naryah Vagas, LLC.v. Ekorado Hisi, LLC	1/16/2019 1/47/2019 1/47/2019 1/47/2019	Daniei Maul Deniei Maul Semuel Lionel Daniei Maul	Meeting with Meeting with Propare Discussions and analyze regarding Continue working on research related to	0.20	110.00 86.00 975.00 44.00	
SKGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	038537.0004	Naryah Vagas, LLC.v. EKorado Hiss, LLC Naryah Vagas, LLC.v. EKorado Hiss, LLC	1/17/2019	Brenoch Withlin Daniel Mauf	Meeting with Continue working on research	1.40 \$	532.00	
SIGMUND ROGICH	038537,0004	SIGMUND ROCKH 028537 0004 Naryah Vegas, LLC.v. Eldondo HBs, LLC.	1/18/2019	Brenoch Wirthäm	Continue working on research related to a	2.80 \$	00'98 <del>8</del>	
SIGMUND ROGCH SIGMUND ROGCH SIGMUND ROGCH	038537,0004 038537,0004 038637,0004	Naryah Vegas, LLC.v. Eldorado Hils, LLC Naryah Vegas, LLC.v. Eldorado Hila, LLC Naryah Vegas, LLC.v. Eldorado Hils, LLC	1/19/2019 1/22/2019 1/22/2019	Grenoch Withlin Deniel Meul Brenoch Withlin	Continue preparing Ernal end call regarding	3.10 3.80 5.070	1,178.00 792.00 286.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hila, LLC Nanyah Vegas, LLC.v. Eldorado Hila, LLC	1/23/2019	Samuel Lionel Daniel Mard	Review Continue (I	3.00 \$	1,356.00	
SIGNUND ROCKCH 038537.0004	038537,0004	Nanyah Vegas, LLC.v. Exdonado Hitis, LLC	1/24/2019	Brenoch Wirthlin		1.70 \$	646.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Narryah Vegas, LLC.v. Eldorado Hits, LLC Narryah Vegas, LLC.v. Eldorado Hits, LLC	1/24/2019	Daniel Maul Daniel Maul	Meeting with	0.50 \$ 0.20 \$	110.00 44.00	
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SIGMUND ROCICH 038537.0004	036537.0004	Nanyah Vagas, LLC.v. Eldorado Hills, LLC	1/26/2019	Brenoch Wirthlin	Finalize Prenam for	4.80 \$	1,824,00	_
SKGMUND ROCKCH 038537,0004 SKGMUND ROCKCH 038537,0004	038537.0004	Narryah Vegas, LLC.v. Ektorado Hills, LLC Narryah Vegas, LLC.v. Ektorado Hills, LLC	1/28/2019	Daniel Maul Lz Delhegro	Topare or	8.4.8 8.30 8.8	880.00 1,247.00	<b>r</b> =
SIGMUND ROCIOH 038537,0004	038537,0004	Neryth Vegas, LLC.v. Eldorado Hills, LLC	1/28/2019	Deniel Maus	NEVIEW DI	0.50 \$	110.00	_
SIGMUND ROGICH O	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	1,28,2019	Samuel Lionel Tom Fell	Anerioarice at Meeing with Continue working on research related to	3.00 2.40 \$	1,560.00	0.0
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	038537.0004	Naryah Vagas, LLC.v. Eldorado HBs, LLC Naryah Vagas, LLC.v. Eldorado Hās, LLC	1/28/2019	Brenoch Wirthlin Daniel Maul	Review and analysis regarding	95. 0.20 \$ \$	88 86.89 80.	6.5
SIGMUND ROCKCH 038537,0004 SIGMUND ROCKCH 038537,0004	038537,0004	Naryah Vegas, LLC.v. Eldorado Hits, LLC Naryah Vegas, LLC.v. Eldorado Hits, LLC	1/29/2019	Brenoch Witthlin Lit Dehegro	Research	2.70 \$	1,026,00	
SIGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hilla, LLC	1/29/2019	Deniel Mauf		0.20	44.00	_
SIGMUND ROGICH 038537,0004	038537,0004	Narryah Vegas, LLC v. Eldorado Hils, LLC	1/30/2019	Daniel Mauf	Configure working on research	0:30	66.00	
SIGMUND ROCICH 038637,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hitta, LLC	1/30/2019	Brenoch Wirthlin		2.10 \$	798.00	_
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SIGMUND ROGICH 038537,0004	038537,0004	Namyah Vegas, LLC.v. Eldorado Hills, LLC	1/30/2018	Samuel Lional	a right	2.00 \$	1,300.00	_
SIGMUND ROCKH 038337,0004 SIGMUND ROCKH 038537,0004 SIGMUND ROCKH 038537,0004	038537,0004 038537,0004 038537,0004	Nenyah Vegas, LLC v. Eldorado Hile, LLC Nanyah Vegas, LLC v. Eldorado Hile, LLC Nanyah Vegas, LLC v. Eldorado Hile, LLC	1/302019 1/31/2019 1/31/2019	Deniel Mard Deniel Mard Samuel Llonel	Continue properties of the continue of the con	200 300 300 300 300 300 300 300 300 300	44.00 1,936.00 2,275.00	000
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	1/31/2019	Brenoch Wirthlin		2.80 \$	1,064.00	_
SKSMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilla, LLC.	2/1/2019	Daniel Maul	Prepart	1.10 \$	242.00	_
SIGNUND ROGICH OF SIGNUND ROGICH OF SIGNUND ROGICH	038537.0004 038537.0004 038537.0004	Naryah Vegas, LLC v. Eldorado Häls, LLC Naryah Vegas, LLC v. Eldorado Häs, LLC Naryah Vegas, LLC v. Eldorado Häs, LLC	2/2/2019 2/4/2019 2/4/2019	Branoch Wirthlin Damiel Meul Tom Fett	Conterence regarding Work on <i>t</i>	3.00 S.	3,572.00 660.00 1,850.00	0.5.0
SIGMUND ROGICH 038637,0004 SKGMUND ROGICH 038637,0004	038637,0004	Nanyah Vegas, LLC.v. Eldorado Hila, LLC Nanyah Vegas, LLC.v. Eldorado Hila, LLC	2/4/2019	Brenoch Wirthin Semuel Lional		2.50 2.50 2.50	1,748.00	<b>.</b>
SIGMUND ROCKCH 038537,0004	038537,0004	Manyah Vegas, LLC.v. Eldorado Hits, LLC	2/4/2019	Daniel Maus	Discussions and analysis	0.30	98,00	_
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SIGMUND ROGICH 038537,0004	004 Nanyah Veges, LLC.v. Eldorado Hills, LLC		Brenoch Wirthlin	Correspondence regarding	2 10 5	70800
SIGMUND ROGICH 038537,0004			Owniel Matul	Prepara and	8	330.00
SIGNUND ROCICH 038537			Derziel Maul	Begin draffing	8	97
LASSES HOSOR DIVERSION	UCA - Nanyan Vegas, LLC.V. Eldorado Hills, LLC	2/15/2019	Daniel Maul	Continue	2.10 \$	462.00
SIGMUND ROGICH 038537,0004	004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	2/15/2019	Daniel Maul		¥ 62.0	8
O TERROR HOROCO CINITACIS				Receipt and review o		<b>8</b>
SIGMUND ROGICH 038537,0004	004 Nanyah Vegas, LLC.V. Exponedo Mas, LLC 004 Nanyah Vegas, LLC.V. Eldorado Hits. LLC	2/15/2019	Denial Maus	Mactico with	\$ 000	88.00
	•			Finalize		3
SIGMUND ROGICH 038537,0004			Brenoch Wirthen	Correspondence reparding		122 65
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SIGMUND ROSECH 038537.0004		2/16/2019	Brenoch Wirthlin	Review	0.10 \$	38.00
SIGMUND ROGICH 038537.0		2/18/2019	Daniel Mani		•	0000
SKAMUND ROGICH 038537,0004	004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC		Tom Fet	Review and revise	8 S	325.00
SIGNUND ROGICH 038537,0004	004 Nanyah Vegas, LLC.v. Eldonado Héta, LLC		Brenoch Wattkin		\$ 08.2	3.002.00
SIGNICAD ROGICH (188537.0		2/18/2019	Tom Fee	Review	0.30	195.00
SIGMIND BOOKS 028627			E LEO	Norw and revise. Work on	0.30	195.00
SIGMUND ROCKH C38537,0004	004 - Neryah Vegas, LCC.V. Erdorado Hils, LLC 1004 - Neryah Vegas, LLC.V. Erdorado Hila, LLC	2/19/2019	Stenoch Wirthen Daniel Med	Ravica	5.10 s	1,938.00
CHARGE LYSTOCK CHARGOS			5	Draft		86.88
SIGMUND ROGICH 038537,0004	NOVA - Natrykti Vegas, LLC.V. Eldorado Hills, LLC. NOVA - Natrykti Vegas, LLC.V. Eldorado Hilla, LLC.	2/20/2019	Daniel Mad	Conference recarding	4.20 \$	924.00
SIGMUND ROCICH 038537.0			Semuel Lionel	Prepare for	7.00 7.00 8.00 8.00 8.00 8.00 8.00 8.00	1,300.00
SIGMUND ROGICH 038537.0		2/20/2019	Sranoch Wirthlin	Work כה	9	8
SIGMUND ROGICH 038537,0004	1004 Nenyah Vegas, LLC.v. Eldorado Hills, LLC	•	Daniel Maru	Review and analysis regarding	\$ 620	44,00
TARGET HONOR ONOROS		2/21/2018	Daniel Maru	Review and analysis regarding	0.30	00:50
SKAMUND ROGICH 038537,0004	1004 - Nanyah Vegas, LLC.v. Eldorado Hils, LLC	2/21/2019	Daniel Maru	Prepare for and attend	0.20	44.00
S FOR TO TO TO CHI INCOME.			;			
SIGNUND ROGICH D38537 0004	OCK INDRIVER VEGSE, LLCCV. Eldocado Hista, LLC 1994 - Narvah Vedse, LTCV. Eldocado Hille, LTC	2/21/2019	Bremoch Wirthlin	and address of bracks	3.80 \$	00 144
SIGMUND ROGICH 038537.0			Deniel Meu	Attend the first of the Continue drafting of	99 9	352.00
SIGMUND ROGICH 038537.0			Caniel Maul	Review of		8,74 8,8
SIGMUND ROGICH 038537,0004	004 Naryah Vecas, LLC.v. Eldorado 班路, LLC	2/22/2019	Brenoch Witthlin	Correspondence with		\$ \$
				Research and analysis		00.500
SIGMUND ROGICH 038537,0004	004 Nanyah Vegas, LLC.v. Eldorado Hilla, LL.C.	27222019	Daniel Mari		2	
TESSEE HOISOG UNIMERS				Receipt and review email		2,024,00
SIGMUND ROSICH 038537,0004	2004 - Marryan Vegas, LLC.V. Eldovado Filis, LLC 2004 - Nanyah Vegas, LLC.V. Eldovado Hilis, LLC	9102/277 9102/272	Daniel Mad	Uiseussions and analysis recarding	\$ \$ \$ \$ \$ \$	8.5
TOTAL TOTAL STREET			i	Meeting with	•	85
SIGMUND ROGICH 038637,0004	XXX4 - Nanyan Vegas, LLC.V. Eldonado Hilla, LLC XXX4 - Nanyan Vegas, LLC.V. Eldonado Hilla, LLC	2/25/2019	Densel Mau	Work on its accordance in	0.90 \$	198,00
				Decusions and analysis with	° 247	912.00
SIGMUND ROCKCH 038537.0		2/25/2019	Daniel Marc			3
SIGMUND ROCKCH 038537,0004 SIGMUND ROCKCH 038537,0004	2004 Nanyah Vegas, LLC.v. Edorado Hils, LLC 2004 Nanyah Vegas, LLC.v. Edorado Hils, LLC		Deniel Mauf Deniel Mouf	Meeding with Set-up	2 S S S S S S S S S S S S S S S S S S S	8 4 % 8 8 8
					•	0.00

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Client Name	Matter	Matter Name	Work Date	Timekeeper Name		Hours	Amount	Task
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038637,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3/30/2019	Brenoch Wirthlin Daniel Maul	Work on Review Continue	4.70 \$	1,786.00 660.00	
					Work on issues			
SIGMUND ROGICH ( SIGMUND ROGICH ( SIGMUND ROGICH (	038537,0004 038537,0004 038537,0004	Nanyah Vegas, L.C.v. Eldorado Hilis, LLC Nanyah Vegas, L.C.v. Eldorado Hilis, LLC Nanyah Vegas, L.LC.v. Eldorado Hilis, L.LC	4/1/2019 4/1/2019 4/1/2019	Brenoch Wirthlin Daniel Mauf Samuel Lionel	Continue preparing Commence reading	4.20 \$ 6.20 \$ 3.50 \$	1,596.00 1,364.00 2,275.00	
SIGMUND ROGICH ( SIGMUND ROGICH ( SIGMUND ROGICH (	038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/1/2019 4/1/2019 4/2/2019	Daniel Maul Daniel Maul Daniel Maul	Exchange Review and analysis Meeting to	0.40 \$	88.00 66.00 66.00	
					Continue working on issues Continue	_		
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/2/2019 4/2/2019	Brenoch Wirthlin Samuel Lionel	Continue review is	3.00 \$	1,748.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/2/2019	Daniel Maul	caulatige eritais Panaint antanun 6 a sanca	0.20 \$	44.00	
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/2/2019 4/2/2019 4/2/2019	Daniel Maul Daniel Maul Daniel Maul	neocycla iu i roview u e-serveu Confinue preparing Meeting with	0.20 \$ 0.60 \$ 3.30 \$	44.00 132.00 726.00	
					Continue working on issues			
SIGMUND ROGICH O	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/3/2019 4/3/2019 4/3/2019	Brenoch Wirthlin Samuel Lionel Tom Fell		3.20 2.00 \$ 1.30 \$	1,216,00 1,300.00 845,00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/4/2019	Daniel Mauf	Receipt and review emails regarding	0.20	44.00	
					Continue working on issues related to			
SIGMUND ROGICH (SIGMUND ROGICH	338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004	Nanyah Vogas, LLC.». Efdorado Hils. LLC	4/4/2019 4/4/2019 4/4/2019 4/4/2019 4/5/2019 4/5/2019 4/5/2019	Brenoch Wirthlin Deniel Mauf Daniel Mauf Danie Mauf Tom Fell Tom Fell Tom Fell Tom Fell Tom Fell	Discussions and analysis Attend Receipt and review of Conference with Conference with client regarding Draft email to	80.40.9.1.6.1.0 0.00.00.1.6.1.0 0.00.00.00.1.0 0.00.00.00 0.00.00.00	3,078.00 110.00 110.00 924.00 66.00 2,145.00 2,145.00 2,145.00 975.00 44.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, L.C.v. Eldorado Hills, LLC	4/5/2019	Daniel Maul	Meeting with	5.40 \$	1,188.00	
					Work or			
SIGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/5/2019	Brenoch Wirthlin	Continue working on	8.40 \$	3,192.00	
SIGMUND ROGICH	038537.0004	SIGMUND ROGICH 038537,0004 Nanyah Vegas, L.C.v. Eldorado Hills, L.C.	4/6/2019	Branoch Wirthlin		3.10 \$	1,178,00	

Client Name	Matter	Matter Name	Work Date	Timekeeper Name		Hours	Amount Task	
SIGMUND ROGICH O	038537,0004	Naryah Vegas, LLC.v. Eldorado Hils, LLC	4/8/2019	Samuel Lionel	Review Continue	2.50 \$	1,625,00	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	38537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/8/2019 4/9/2019	Brenoch Wirthlin Daniel Maul	Prepare and draft	5.40 \$ 0.20 \$	2,052.00	
SIGMUND ROGICH 038537.0004	38537.0004	Nanyah Vegas, L.C.v. Eldorado Hills, LLC	4/9/2019	Daniel Maul	Contrue reviewing Begin drafting Review	5.60 \$	1,232.00	
SIGMUND ROGICH 038537,0004	38537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/9/2019	Samuel Lionel	C. C	3.50 \$	2,275.00	
SIGMUND ROGICH 038537,0004	38537.0004	Nanyah Vegas, LLC.v. Eldorado Hills. LLC	4/9/2019	Tom Fell	Nevven Continue strategizing and	0.30 \$	195.00	
SIGMUND ROGICH 038537.0004	38537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/9/2019	Brenoch Wirthlin	Meetins with	2.90 \$	3,002.00	
SIGMUND ROGICH OF	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	4/9/2019 4/9/2019	Daniei Maul Daniei Maul	Receipt and review of Draft	0.40 \$	88.00 44.00	
SIGMUND ROGICH OF SIGMUND ROGICH SIGMUND ROGICH OF SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH SIGMUND R	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/9/2019 4/9/2019 4/9/2019	Daniel Maul Daniel Maul Daniel Maul	Coordinate Prepare	0.20 \$ 0.60 \$ 0.20 \$	44,00 132.00 44,00	
SIGMUND ROGICH OF	038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/9/2019 4/10/2019	Daniel Maul Brenoch Wirthlin	Review and analysis of Property of Propert	1.60 \$	352.00 608.00	
SIGMUND ROGICH O	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/10/2019	Daniel Maul		\$ 08.0	66.00	
SIGMUND ROGICH O	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/10/2019	Daniel Maul	Receipt and review of Continue review of	0.20	44.00	
SIGMUND ROGICH OSIGMUND ROGICH OSIGMUND ROGICH O	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC	4/10/2019 4/10/2019 4/11/2019	Daniel Mau Daniel Mau Tom Fell	Continue Coordinate service of 1 Conference with Continue working on issues	3.20 0.20 3.00 \$	704.00 44.00 1,950.00	
SIGMUND ROGICH 038537,0004	138537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/11/2019	Brenoch Wirthlin		10.30 \$	3,914,00	
SIGMUND ROGICH 038537,0004	38537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/11/2019	Daniel Maul	Receipt and review	0.30 \$	66.00	
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	038537,0004 038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC Nanyah Vegas, LLC.v. Eidorado Hils, LLC	4/11/2019 4/11/2019 4/12/2019	Caniel Maul Samuel Lionel Daniel Maul Daniel Maul	Conference with Review and revise Continue preparing	11.90 \$ 2.50 \$ 0.30 \$ 11.90 \$	2.618.00 1.625.00 66.00 2.618.00	
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/12/2019 4/12/2019 4/12/2019	Brenoch Wirthin Tam Fell Liz Delnegro	Work on Draft memorandum on research regarding Review	2 2 2 3 3 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4	3,154.00 1,365.00 580.00	
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	38537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/12/2019 4/13/2019	Samuel Lionel Daniel Maul	Review and analysis of	2.60 \$	2,600.00 572.00	

Ctent Name	Matter	Matter Name	Work Date	Work Date Timekeeper Name Namative	Narrative	Hours	Amount Task	
					Confinue researching			
SKGMUND ROGKH O SKGMUND ROGKH O SKGMUND ROGKH O SKGMUND ROGKCH O	038537,0004 038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado His, LLC Nanyah Vegas, LLC.v. Eldorado His, LLC Nanyah Vegas, LLC.v. Eldorado His, LLC Nanyah Vegas, LLC.v. Eldorado His, LLC	4/13/2019 4/14/2019 4/15/2019 4/15/2019	Brenoch Withlin Deniel Med Tom Fell Tom Fell	Continue preparing Continue preparing Continue preparing Continue preparation of	2.00 0.40 0.00 0.80 8 8 8	1,872.00 440.00 260.00 520.00	
SIGMUND ROCKH 038537,0004 SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	4/15/2019 4/15/2019	Brenoch Wirthlin Deniel Maul	Meefros with	10.10 8.10 \$	3,838.00	
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Ekkorado Hills, LLC	4/15/2019	Daniel Mau		200 \$	440.00	
SIGMUND ROGICH: 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/15/2019	Tom Fell	Conference with	0.60	390.00	
SIGMUND ROCKCH 036537.0004	036537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/15/2019	Samuel Lionel	conference with:	5.00	3,250.00	
SIGMUND ROGICH 038537,0004	036537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/16/2019	Brenoch Wirthlin		14.90 \$	5,062.00	
SIGMUND ROGICH 038537,0004	1 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC	4/16/2019	Liz Deinegro	researd.	1.10 \$	319.00	
SIGMUND ROCKCH 038537,0004	1 038537.0004	Nanyah Vegas, LLC.v. Ektorado Hišs, LLC	4/16/2019	Oscargo zin	naseuni Mee'ng with	1.00	280.00	
SKGMUND ROGICH 038537.0004	038537,0004	Namyah Vegas, LLC.v. Extonsoo Hits, LLC	4/16/2019	Darriel Mark	Conference with §	2.70 \$	694.00	
SIGMUND ROGICH 038537,0004	1 038537,0004	Nanysh Vegas, LLC.v. Eldorado Hits, LLC	4/16/2019	Samuel Lional	Bassaich and Healt and one for	5.00 \$	3,250.00	
SIGMUND ROGICH SIGMUND ROGICH	038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/16/2019	Jon Linder Deniel Maul	Assist with the second	3.50	770.00 176.00	
SIGMUND ROGICH SIGMUND ROGICH	038537.0004		4/16/2019	Tom Fell Deniel Meu	Continue preparing	6.00	325.00 1,320.00	
SIGMUND ROGICH	039637.0004	Nertyen Veges, LLC.v. Eldorado Hills, LLC. Nertyen Veges, LLC.v. Eldorado Hills, LLC.	4/16/2019	Tom Fet	Meeting with Continue drafting	2.5 0.80	462.00 520.00	
SIGMUND ROGICH	038537.0004	Naryah Vegas, LLC.v. Edorado Hills, LLC. Naryah Vegas, LLC.v. Edorado Hills, LLC.	4/16/2019	Tom Fa	Conference with Review and nevise.	\$ 02.0 \$ 02.0 \$ \$	1,105.00	
SIGMUND ROGICH	1 039637,0004		4/16/2019	Tom Fell	Repearch cases Receipt and review of		260:00	
SIGMUND ROGICH	4 038537,0004	Nanyah Vegas, LLC.v. Edorado Hills, LLC Nagyah Vegas, LLC.v. Edorado Hills, LLC	4/17/2019	Daniel Mau	Meeting with		110.00	
SIGHTOND ROCICH		Nanyah Veges, LLC.v. Eldorado Hills, LLC	4/17/2019	Ton Fet	Conference with		3,000,00	
SIGMUND ROCICE	4 038537.0004		4/17/2019	n <b>beheg</b> ro	Drak memorandum regarding	2.30	667.00	
AND TONEM HOLDER GIVINGS	Manage 20004	Annual Manager 11 C.	0.000	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	rrepare		,	
SOUND NOTICE OF STREET	**************************************		A10701/4	Samuel Coner	Prepare arguments for	# 86 87	3,900:00	
SIGMUND ROGICH	4 038537,0004 4 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hila, LLC Nanyah Vegas, LLC.v. Eldorado Hila, LLC	4/17/2019	Daniel Maul	Meeting with Consepondence with Continue working	6,00 8 8	880.00 1,100.00	
SKGMUND ROGICE	H 038537,0004	SIGMUND ROOKH 038537,0004 Naryan Vagaa, LLC v. Eldorado Hils, LLC	4/17/2019	Branoch Withlin		5.90 8	2,242,00	

Timekeeper Name Narrative

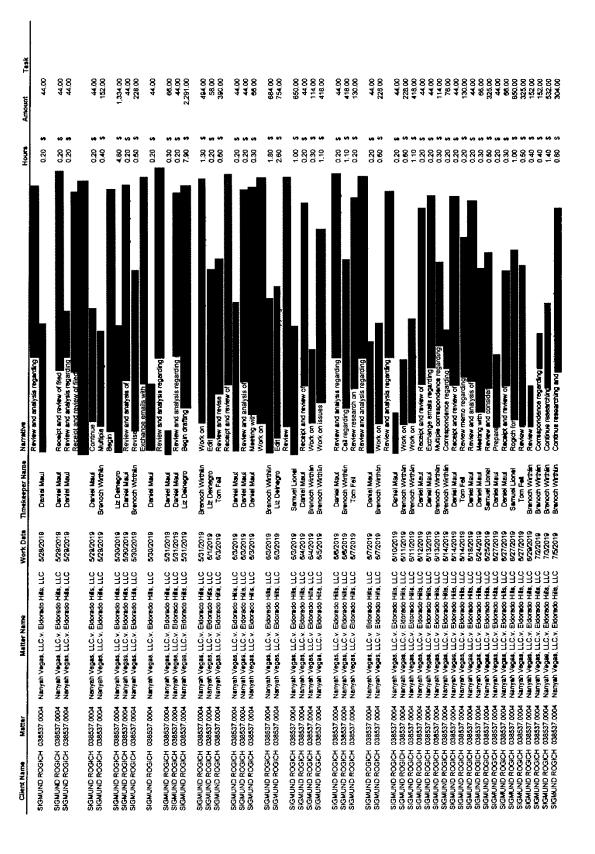
Matter

Client Name

Client Name Matter	Matter Name	Work Date	Timekeeper Name	Narrative	Hours	Amount Task
				Receipt and review of		
SIGMUND ROGICH 036537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/28/2019	Dentiel Meus		0.50 \$	110,00
SIGMUND ROCKCH 038537.0004	4 Nanyah Vegas, LLC.v. Eldorado Hila, LLC	4/30/2019	Daniel Mau	re-cuty and review or Cortirve researching	0.70	154.00
SIGMUND ROGICH 038537,0004	4 Nerryeh Vegas, LLC.v. Eldorado Hills, LLC	4/30/2019	Brenoch Wirthlin		2.60 \$	988.00
SIGMUND ROGICH 038637,0004	4 Naryah Vegas, LLC.v. Eldorado Hile, LLC	4/30/2019	Dankel Mate	Research and analysis	0:30	98.00
				Telephone call with	_=	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hilis, LLC 4 Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	5/1/2019 5/1/2019	Daniel Maul Daniel Maul		3.80	836.00 86.00
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	4 Narryah Vegas, LLC.v. Eldorado Hils, LLC 4 Narryah Vegas, LLC.v. Eldorado Hils, LLC	5/1/2019 5/1/2019	Daniel Mauf Tom Feil	Necator and ferview of Red Review issue and	0.20 0.80 80 80	520.00 620.00
SIGMUND ROGICH 038637,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$1/2019	CIE Delnegro	Keserch Review	5.20 \$	1,508.00
SIGMUND ROGICH G38537,0004 SIGMUND ROGICH G38537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC 4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/1/2019 5/1/2019	Samuel Llonel Branoch Wirthlan	Review	2.00 \$	1,300.00
SKAMUND ROGICH 038537,0004 SKAMUND ROGICH 038537,0004 SKAMUND ROGICH 038537,0004	4 Naryah Vegas, L.C.v. Eldorado Hila, L.C. 4 Naryah Vegas, L.C.v. Eldorado Hila, L.C. 4 Naryah Vegas, L.C.v. Eldorado Hila, L.C.	5/2/2019 5/2/2018 5/2/2018	Semuel Lionel Brenoch Wirthlin Deniel Meul	Conference with Work on Meeting with	00.00 07.00 0.00 0.00 0.00 0.00 0.00 0.	1,850.00 286.00
SIGMUND ROGICH 038637,0004 SIGMUND ROGICH 038637,0004		\$/3/2019 \$/3/2019	Branoch Withlin Jon Linder	Continue draffing, researching and revising Locate and organize		3,118.00
				Conference with		
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hila, LLC 4 Nanyah Vegas, LLC.v. Eldorado Hila, LLC	5/3/2019 5/3/2019	Samuel Lionel Jon Linder	Draft	4.00 4.00 8.03 8.03	2,600.00
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hita, LLC 4 Nanyah Vegas, LLC.v. Eldorado Hita, LLC	5/3/2019 5/6/2019	Jon Linder Daziei Maus	Kewew Prepare and draft	220 100 100 100 100 100 100 100 100 100	484.00 220.00
SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$48/2019	Brenoch Wirthlin	Continue researching		646.00
SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/6/2019	Daniel Mauf	Kevrew and analysis of	1.50 \$	330.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC. 4 Nanyah Vecas, LLC.v. Eldorado Hills, LLC.	5/8/2019 5/8/2019	Daniel Maud	Moeting with	1:00	220.00
SIGMUND ROGICH 038637,0004 SIGMUND ROGICH 038637,0004		5.6.2019	Tom Fee	Review and revise	0.70 0.70 0.70	455.00
SIGMUND ROGICH 038537,0004		5/6/2019 6/6/2019	Daniel Mau	Necessity and review	0.30 0.30 0.30	<b>24.29</b> 00.00
SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldonado Hills, LLC	5772019	Tom Fet	Contraction regarding s	. 0.80	\$20.00
SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldonado Häls, LLC	6/7/2019	Samuel Liones	KEVAW.	1.00	650.00
SIGMUND ROGICH 038637.0004	4 Nanyah Vegas, LLC.v. Edonado Hills, LLC	\$772019	Brenoch Wirthlin	CALMINE Researching and	3.40 \$	1,282.00
SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado HHs, LLC	\$772019	Derrie) Maul	Newton districts of	0.40	88.00
SIGMUND ROGICH 038637:0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2019	Carriet Maul	Review and analysis of	0.20	00,14
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC 4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/9/2019 5/8/2019	Daniei Mau Daniei Meu	Draft email to Revise and revise	0.20	<del>1</del> 4 8.8

Clent Neme	Matter	Matter Name	Work Date	Timekeeper Name Namethe	Narradive	Hours	Amount	Task
HOROS CINCINGIS	9000 20900	Clinate County (Clinate V descent	610000	i and injury	Review and revise	0.20	5.25	
		The state of the s			Commerce review of a	2	3	
SIGMUND ROGICH 038537,0004		Namyah Vegas, LLC.v. Eldoredo Hills, LLC	5/9/2019	Semuel Lonel	Review and analysis of	1.50	975.00	
SIGMUND ROGICH	036537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/0/2019	Daniel Meul	him samularia with	1.30	286,00	
SIGMUND ROCICH	038537,0004	Nanyah Vagas, LLC.v. Eldorado Hills, LLC	5/9/2019	Brenoch Wirthlin	Correspondence must	1.40 \$	532.00	
SIGMUND ROGICH 038537,0004	038537.0004	Naryah Veges, LLC.v. Eldorado Hilla, LLC	5/10/2019	Daniel Mard	Continue researching, drafting and revising	0.20	44.00	
SIGMUND ROGICH	038537,0004	Namyath Vegas, LLC.v. Eldorado Hills, LLC	5/10/2019	Brenoch Wirthlin		4.20 \$	1,596.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/10/2019	Damiel Maud	Receipt and review of	0.30	98.00	
SIGNATURE ROSCO	030537,000	Namyah Vegas, LLC.v. Eldonido Hills, LLC.	5/10/2019	Daniel Mau	Meeting with	8 8	220,00	
SIGMUND ROGICH	038537.000	1 Namyah Veges, LLC.V. Eldorado Hills, LLC		Deniel Meul	Covered and displaying Covered and and and and and and and and and an	, <del>, ,</del>	1 1 3 8	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, L.C.v. Eldorado Hits, L.C. Nanyah Vegas, L.C.v. Eldorado Hits, L.C.	5/13/2019 5/13/2019	Daniel Meul Daniel Meul	Receipt and review of	0.30 0.20 0.20	8.89 9.84	
SIGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/14/2019	Deniel Maul	Pavlau and analyds of	0.20	44,00	
SIGNUND ROGOR	038537,0004		61472019	Chanlet Man		660	877	
SIGMUND ROGICH	038537,0004	Nenyah Vegas, L.C.v. Eldorado Hills, LL.C.	8/15/2019	Daniel Maul	Review and analysis	0.20	4	
SIGMUND ROGICH	038537,0004		575,2019	Daniel Mari	Review and enabysis regarding	0.40 0.40 0.40	8.5	
		011 (1811-021 011)			Receipt and review of	2	8.9	
SIGNUND ROGICH	C38537,0004	Nanyah Vegas, LLC.v. Eldorado Hilla, LLC Nanyah Vegas, LLC.v. Eldorado Hilla, LLC	\$/15/2019 \$/17/2019	Daniel Maul	Meeling with	0.20 1.60 <b>s</b>	352.00	
SIGMUND ROGICH	038537 0004	CT SHE CONCORD VOICE STORY CONCORD	54770019	Remorth Within	Revow	5	5	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	\$720/2010	Branoch Wirthlin	Work on leaues Work on leasues	98.0	342.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	6/21/2019	Brenoch Wirthlin	Piercealcon and menhalic with	\$ 05:0	190.00	
SIGNUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$21/2019	Deniel Maus	Concessor is an at all plyate will	0.20	44.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/21/2019	Daniel Mau	Receipt and review	\$ 020	44,00	
SKGMUND ROGICH	038537,0004	Nanyah Yepas, LLC.v. Eldorado Hitis, LLC	\$12/2018	Deniel Mauf	Prepare and Review stratfation reparding	<del>\$</del>	28. 188 188	
SIGMUND ROCICH 038537,0004	008537,0004	Nanysh Vegas, LLC.v. Eldorado Hills, LLC	5/22/2019	Tom Fel!	Continue	070	130.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$22/2019 \$22/2019	Brenoch Wirthlin Daniel Maul	Review and analysis regarding	2.10	78.90 9.44	
					Receipt and review of			
SIGNUND ROGICH	038537 0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Naoyah Vedes, 15.0 v. Eldorado Hils, 15.0	5722/2019 673/2019	Deniel Med	Receipt and review of	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	88.8	
SIGNOND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC	\$23/2019	Deniel Mad	Meeting to	0 0 0 0	88	
SIGNOND ROGICA	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5232019	Too Te	Review Work on issues	0.30 0.30	185.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/23/2019	Branoch Wirthlin	Bessert and unit or	0.80	304.00	
SIGMUND ROGICH 038537,0004	038637.0004	Namyah Vegas, LLC.v. Eldorado Hills, LLC.	5/24/2019	Brancch Wirthlin		3.10 \$	1,178,00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/24/2019 5/24/2019	Daniel Maul	Review	2.50 \$	232.00	
SIGHUND ROGICH	038537,0004	Narryah Vecas, LLC.v. Eldorado Life. LLC	5/24/2019	Jen Linder	Summanze	070	25.0	
000000000000000000000000000000000000000					Research and analysis of		3	
SIGMUND ROCKCH (38537,0004)	038537.0004	Namyan Vegas, LLC.V. Eloorado Hall, LLC. Namyah Vegas, LLC.V. Eldorado Hills, LLC.	5/28/2019	Daniel Mau	Review and analysis recording	<b>9 9</b>	4 4 8 8	
SIGMUND ROCKH	038537,0004		5282019	Tom Fell	Review	0.40	280.00	

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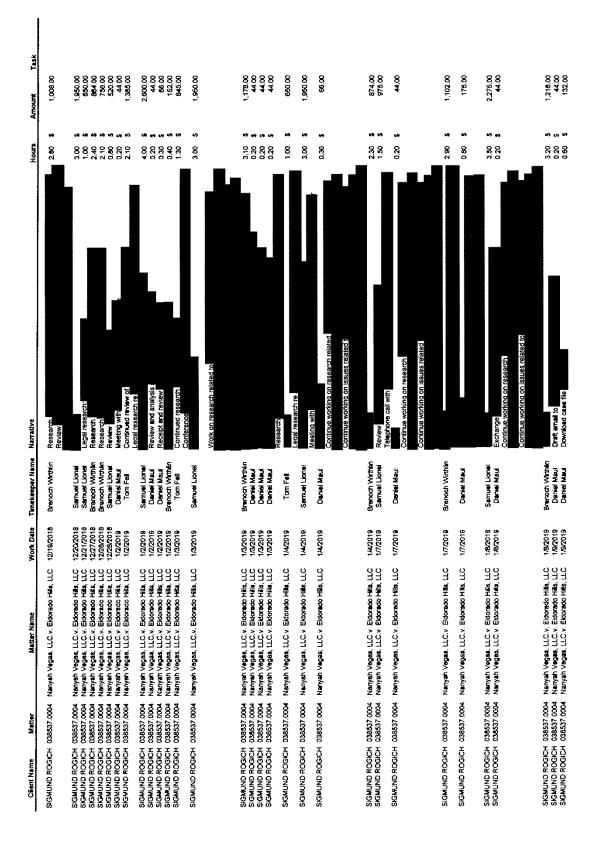
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Client Name Matter	r Matter Name	Work Date	Work Date Timekeeper Name Narrative	Narrative	Hours	Amount	Task
				Review			
SIGMUND ROGICH 038537.0	SKGMUND RUGICH 038537.0004 Nanyah Vegas, LLC.v. Eldorado Hils, LLC 9/20/2019	9/20/2019	Brenoch Wirthlin	Review	2.30 \$	874.00	
SIGMUND ROGICH 038537.0	SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	9/20/2019	Chris Byrd	Confinie researching and drafting	0.50	262.50	
SIGMUND ROGICH 038537,01 SIGMUND ROGICH 038537,01	SIGMUND ROGICH 038537,0004 Naryah Vegas, LLC.v. Eldorado Hils, LLC SIGMUND ROGICH 038537,0004 Naryah Vegas, LLC.v. Eldorado Hils, LLC	9/23/2019	Brenoch Wirthlin Chris Byrd	Review and The Visit of the Vis	3.80	1,444.00	
SIGMUND ROGICH 038537 OF	SIGNIND ROGICH 038537 0006 Names Verse V. C. V. Chersch Lille VI.		to the state of th	Review	000	00.761	
SIGMUND ROGICH 038537.04	SIGMUND ROGICH 038537.0004 Nanyah Vegas, LLC.y. Eldorado Hills, LLC		Tons Fell	Beview	9 00	195.00	
				Work on issues related to	207.0	00.001	
SIGMUND RUGICH 038537.0	SIGMUND RUGICH 038537.0004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC 9/26/2019	9/26/2019	Brenoch Wirthlin	Work on issues related to	1.90 \$	722.00	
SIGMUND ROGICH 038537.0	SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	912772019	Brenoch Wirthlin	Work m issues related to	2.90 \$	1,102.00	
SIGMUND ROGICH 038537.0	SIGMUND ROGICH 038537.0004 Nanyah Vegas, LLC v. Eldorado Hills, LLC 9/30/2019	9/30/2019	Brenoch Wirthlin	Raview email from	2.10 \$	798.00	
SIGMUND ROGICH 038537.0	SIGMUND ROGICH 038537,0004 Nanyah Vegas, LLC.v Eldorado Hills, LLC	10/8/2019	Timothy Berg	יייים אינים ווקון	0.40 \$	270.00	
					s ######	1,354,453.50	q

Client Name	Matter	Matter Name	Work Date	Timekeeper Name	Narrativa	Hours	Amount Task
					Review and analysis regarding		
SIGNUND ROGICH 034	038537,0004	Nerryah Vegas, LLC.v. Eldonado Hills, LLC	10/29/2018	Daniel Maus	Revise Objection in	\$ 06.0	169.00
SIGMUND ROCKCH 038537,0004		Nenyah Vegas, LLC.v. Eldorado Hills, LLC	10/29/2018	Daniel Meul	Continue working on (	1,50 \$	315.00
SIGMUND ROGICH 038537.0004	18537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1029/2018	Brenoch Wirthlin	Oreshops for manifest and	\$ QZ \$	1,512.00
SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldonedo Hits, LLC	10/30/2018	Daniel Maul	repare to meouily will	8.50 \$	1,785,00
SIGMUND ROGICH 038537,0004	18537.0004	Nanyah Vegas, LLC.v. Eldorado Hilla, LLC	10/30/2018	Branoch Wirthlin	neparation Presare and draft email to	6.90	2,484.00
SIGMUND ROCKCH 038537.0004		Nenyah Vegas, LLC.v. Eldorado Hills, LLC	10/31/2018	Daniel Maul	Discussions and analysis with	0.20	42.00
SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hils. LLC	10/31/2018	Daniel Maul	Receipt and review of	06:0 \$	189.00
SIGMUND ROGICH 03 SIGMUND ROGICH 03	038537,0004	Narrysh Vegas, LLC.v. Eldorado Hils, LLC Narrysh Vegas, LLC.v. Eldorado Hils, LLC	10/31/2018	Deniel Maul Brenoch Wirthlin	Солинъе working	1.80 \$ 5.40 \$	376.00 1,944.00
SIGMUND ROCKH 03 SIGMUND ROCKCH 03 SIGMUND ROCKCH 03 SIGMUND ROCKCH 03	038537,0004 038537,0004 038537,0004 038537,0004	Naryah Vegas, LLC.v. Eldorado Hita, LLC Naryah Vegas, LLC.v. Eldorado Hita, LLC Naryah Vegas, LLC.v. Eldorado Hita, LLC Naryah Vegas, LLC.v. Eldorado Hita, LLC	11/1/2018 11/1/2018 11/1/2018	Derriel Maul Darriel Maul Darriel Maul		3.40 0.20 0.20 3.00 3.00 3.00 3.00 3.00 3.0	744.00 43.00 23.00 42.00
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/1/2018	Branoch Wirthlin Samuel Llonel	Work on \$5,986 released to Work on \$5,986 released to MM Continue reviewing Preparation	3.50	1,404.30
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004	038537.0004 038637.0004 038537.0004	Narysh Vegas, LLC.v. Eldorado Hils, LLC Narysh Vegas, LLC.v. Eldorado Hils, LLC Narysh Vegas, LLC.v. Eldorado Hils, LLC Narysh Vegas, LLC.v. Eldorado Hils, LLC	11/2/2018 11/2/2018 11/2/2018	Deniel Mau Daniel Mau Brenoch Withlin Deniel Mau	Continue preparing Receipt and review of Continue working on Review and analysis regarding	2.0.0.0 0.20.0 0.00.0 0.00.0 0.00.0	1,029.00 42.00 1,116.00 105.00
SIGMUND ROGICH 03 SIGMUND ROGICH 03	038537.0004		11/5/2018 11/5/2018	Daniel Mau Daniel Mau	Keview and analysis or Review and analysis regarding. Attend telephonic conference	0.50	105.00 128.00
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	38537,0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC Nanyah Vegas, LLC.v. Eldorado Hits, LLC	11/5/2018	Daniel Maul Samuel Lionel	Conference with	0.40 4.00 \$	84.00 2,600.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	38537,0004	Naryah Vegas, LLC v. Eldorado Hila, LLC Naryah Vegas, LLC v. Eldorado Hila, LLC	11/5/2018	Brenoch Wirblin Brenoch Wirblin	Ceă îngarding Confirme working Review and analysis regarding	2.50 1.40 80 80	648.00 504.00
SIGMUND ROGICH OS SIGMUND ROGICH OS	038537,0004 038537,0004	Nanyah Vegas, LLC.v. Ektorado Hils, LLC Nanyah Vegas, LLC.v. Ektorado Hils, LLC Nanyah Vegas, LLC.v. Ektorado Hils, LLC	11,6,2018 11,6,2018 11,7,2018	Daniel Maul Samuel Lonel Deniel Maul	Review Receipt and review Receipt and review	3.00 \$	273.00 1,850.00 42.00
SIGMUND ROGECH D3 SIGMUND ROGECH D3 SIGMUND ROGECH D3 SIGMUND ROGECH D3	038537,0004 038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Edorado Hills, LLC Nanyah Vegas, LLC.v. Edorado Hills, LLC Nanyah Vegas, LLC.v. Edorado Hills, LLC Nanyah Vegas, LLC.v. Edorado Hills, LLC	11,772018 11,772018 11,772018 11,772018	Darviel Meud Darviel Meud Brenoch Wirthlich Semuel Lional	Notice and analysis legaliding. Recapit and review. Continue working on Subject to the continue working on Subject to the continue working on Subject to the continue working to the continue working to the continue to the c	0.20 0.20 1.20 5 6 6 7	42.00 42.00 432.00 976.00
SIGMUND ROGICH OR SIGMUND ROGICH OR SIGMUND ROGICH OR	038537,0004 038537,0004 038637,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/8/2018 11/8/2018 11/8/2018	Samuel Llonel Deniel Maul Daniel Maul	Review and analysis regarding Recept and review Resetting to secure	3 5 6 0 5 0	1,950,00 42,00 42,00
SIGMUND ROGICH DO SIGMUND ROGICH DO	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/12/2018 11/12/2018	Carriel Masu Samuel Lional	Review	3.50	735.00 975.00

Client Name Ma	J		Work Date	Timekeeper Name	Narrative Review and analysis		Amount Task	
SIGMUND ROGICH 03853	038537.0004 N	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/13/2018	Daniel Mauf	Work on issues related	1.20 \$	252.00	
SIGMUND ROGICH 03853	038537.0004 N	Nanyah Vegas, LLC.v. Eldorado Hills, L.LC	11/13/2018	Brenoch Wirthlin	Conference with	1.10 \$	396.00	
SIGMUND ROGICH 03853	038537,0004 N	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/13/2018	Samuel Lionel		3.30 \$	2,145,00	
SIGMUND ROGICH 03853 SIGMUND ROGICH 03853 SIGMUND ROGICH 03855	038537,0004 N 038537,0004 N 038537,0004 N	Naryah Vegas, LLC.v. Eidorado Hills, LLC. Naryah Vegas, LLC.v. Eidorado Hills, LLC. Naryah Vegas, L.C.v. Eidorado Hills, LLC.	11/14/2018 11/14/2018 11/15/2018	Samuel Lionel Brenoch Wirthlin Samuel Lionel	Review Confinue working on Preparation	2.00 \$ 1,40 \$ 3.00 \$	1,300.00 504.00 1,950.00	
SIGMUND ROGICH 03853 SIGMUND ROGICH 03853 SIGMUND ROGICH 03853	038537.0004 N 038537.0004 N 038537.0004 N	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/15/2018 11/16/2018 11/16/2018	Daniel Mauf Daniel Mauf Daniel Mauf	Review and analysis regarding Review and analysis regarding Meeting with	3.50 \$ 0.20 \$ 0.20 \$	735.00 42.00 42.00	
					Recaipt and review of			
SIGMUND ROGICH 03853 SIGMUND ROGICH 03853	038537,0004 N	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Manyah Vegas, LLC.v. Eldorado Hils, LLC	11/16/2018	Samuel Lionel	Preparation for		42.00 975.00	
	038537,0004 N	Naryan Vegas, L.C.v. Eidorado Hills, I.I.C. Naryan Vegas, I.C.v. Eidorado Hills, I.I.C. Naryan Vegas, I.C.v. Eidorado Hills, I.I.C. Narvah Vegas, I.C.v. Eidorado Hills, I.I.C. Narvah Vegas, I.C. v. Eidorado Hills, I.I.C. Eidorado Hills, III. Eidorado Hills, III. Eidorado Hills, III. Eidorado Hills, II.I.C. Eidorado Hills, II.C. Eidorado Hills, II.C. Eidorado Hills,		Daniel Maul Daniel Maul	Review and analysis Noview and analysis Noview and analysis	0.20	42.88 42.80 36.83	
SIGM IND BOGICH 0388	4 7000 2880	Manyah Vagas, ECCV, theologic line, and	0.000	Design transfer	You're und analysis regarding.		00.000	
SIGMUND ROGICH 03850	038537.0004 N	Nanyan Vegas, LLC.v. Eldorado Hills, LLC.     Nanyah Vegas, LLC.v. Eldorado Hills, LLC.     Nanyah Vegas, LLC.v. Eldorado Hills, LLC.	11/20/2018	Daniel Maul	Organize documents for Whole on instead to	0.20	42.00 42.00	
	038537,0004 1	Nanyah Vegas, LLC.Y. Eldorado Filis, LLC. Nanyah Vegas, LLC.Y. Eldorado Hills, LLC. Nanyah Vegas, LLC.Y. Eldorado Hills, LLC.	11/21/2018	Daniel Mauf	Vivin or issues related to Propare in an incident to		466.00 252.00 525.00	
SIGMUND ROGICH 0385:	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/28/2018	Daniel Maul	Ceyen research res		42.00	
SIGMUND ROGICH 03850	038537,0004 P	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	11/28/2018	Danel Maul	Review and analysis regarding Meeting		105.00	
	038537,0004 r 038537,0004 r 038537,0004 r	Nanyan vegas, LLC.v. Eldorado Hills, LLC. Nanyan Vegas, LLC.v. Eldorado Hills, LLC. Nanyan Vegas, LLC.v. Eldorado Hills, LLC	11/30/2018 12/3/2018 12/4/2018	Samuel Lionel Samuel Lionel	Nesearding ( Prepare for Prepare (cr	3.00 8.00 8.00 8.00 8.00	396.00 2,600.00 1,950.00	
SIGMUND ROGICH 0385:	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/6/2018	Samuel Lionel	Review	3.00 \$	1,950.00	
SIGMUND ROGICH 0385:	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/6/2018	Daniel Maul	Keview and analysis regarding	0.20	42.00	
SIGMUND ROGICH 0385. SIGMUND ROGICH 0385.	038537,0004 P	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/6/2018 12/7/2018	Brenoch Wirthlin Daniel Maul	Research Review and analysis Review	2.10 \$	756.00 42.00	
SIGMUND ROGICH 0385.	038537.0004 1	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/10/2018 12/10/2018	Samuel Lionel Daniel Maul	Review and analysis of	4.00 \$ 0.20 \$	2,600.00 42.00	
SIGMUND ROGICH 0385	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/11/2018	Daniel Mauf	Review and analysis		42.00	
SIGMUND ROGICH 0385 SIGMUND ROGICH 0385	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	12/12/2018	Samuel Lionel Daniel Maul	Discussions and analysis regarding	0.20	1,300.00	
SIGMUND ROGICH 0389 SIGMUND ROGICH 0385 SIGMUND ROGICH 0385	038537,0004 038537,0004	Nanyan Vegas, LLC.V. Exocado Filis, LLC. Nanyah Vegas, LLC.V. Exdorado Hills, LLC. Nanyah Vegas, LLC.V. Exdorado Hills, LLC.	12/13/2018 12/13/2018 12/14/2018	Samuel Lionel Daniel Maul Brenoch Wirthlin	Conference with Pervivew and analysis regarding Research regarding	0.50 \$ 0.20 \$ 3.40 \$	325.00 42.00 1,224.00	
SIGMUND ROGICH 0385	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/14/2018	Samuel Lionel	KEVIEW	2.50 \$	1,625.00	
SIGMUND ROGICH 0385 SIGMUND ROGICH 0385 SIGMUND ROGICH 0385	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	12/17/2018 12/17/2018 12/18/2018	Brenoch Wirthlin Samuel Lionel Samuel Lionel	Research Review i Legal research re	2.80 \$ 2.50 \$ 1.50 \$	1,008.00 1,625.00 975.00	
SIGMUND ROGICH 038537.0004		Nanyah Vegas, LLC.v. Eidorado Hills, LLC	12/19/2018	Samuel Lionel	Review (	3.00	1,950.00	



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SIGMUND ROGICH 038537.0004		Navyah Vegas, LLC.v. Eldorado Hitls, LLC	1/8/2018	Brenoch Wirthlin	Meering with	% 06.∵	722.00
SIGMUND ROGICH 038537,0004		Nanysh Vegas, LLC.v. Eldorado Hills, LLC	1/9/2019	Daniel Mauf	Continue working on research related to	0.30	00:00
					Continue	_	
SIGMUND ROCKCH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1/10/2019	Branoch Wirthlin	Cuthings and so and so and so in the	3.10 \$	1,178.00
SIGMUND ROCICH 038537.0004 SIGMUND ROCICH 038537.0004		Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	1/10/2019	Daniel Mauf Samuel Lionel	EXPENSE INC. TRESSAGGES WITH CRAFFING WITH CONTROL OF C	0.20 \$	44.00 1,950.00
					Continue working on issues related to		
SIGMUND ROGICH (038537,0004 SIGMUND ROGICH (038537,0004		Nanyah Vegas, LLC.v. Eldorado Hits, LLC Nanyah Vegas, LLC.v. Eldorado Hits, LLC	1/11/2019	Brenoch Wirthlin Deniel Maul	reviewing Meeting with	4.40 S	1.672.00
SIGMUND ROGICH 03		Nanyah Vegas, LLC.v. Eldorado Hils, LLC	1/14/2019	Deniel Mau	Meeing with		80 034
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1/14/2019	Samuel Llonal Cantel Med	Review Discussions and analysis with	8 8 8 8 8 8 8 8 8	975.00 44.00
SIGMUND ROCICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1/16/2019	Daniel Mau	Discussions and enalysis	90	00 014
					Meeing with		
SKGMUND ROGICH 038537,0004 SKGMUND ROGICH 038537,0004	38537,0004	Nanyah Vagas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	1/16/2019	Deniel Maul Samuel Llonel	Review		264.00
SIGMUND ROGICH 03 SIGMUND ROGICH 03	38537,0004	Nanysh Vegas, LLC.v. Eldonado Hills, LLC Nanysh Vegas, LLC.v. Eldonado Hills, LLC	1/17/2019	Cantel Mauf Semuel Lionel	Otscussions and analysis regarding Prepare exhibits	0.20 5.00 5.00 5.00 5.00	44.00 975.00
					Continue working on research related to a		
					Continue working on issues related.	_	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	38537,0004 38537,0004	Nenyah Vegas, ELC.v. Eldorado Hila, LLC Nanyah Vegas, ELC.v. Eldorado Hila, ELC	1/17/2019	Brenoch Wirthlin Daniel Maul	Weeling with	1.40	532.00 66.00
SIGMUND ROGICH 038537,0004		Nanyah Vegas, LLC.v. Eldorado Hils, LLC	1/18/2019	Daniel Maul	Continue working on research related	\$ 08.4	1,078.00
					l Continue		
SIGMUND ROGICH 03	38537.0004	SIGMUND ROCKH 028537,0004 Nanyah Vegas, LLC.v. Eldorado Hita, LLC	1/18/2019	Brenoch Wirthlin	Continue working on	280	888.00
					Continue	_	
SIGMUND ROCICH CO	038537,0004	Naryah Vegas, LLC.v. Eldorado Hits, LLC. Naryah Vegas, LLC.v. Eldorado Hita, L.C.	1/18/2019	Brenoch Wirthen Brenoch Wirthen	Fmal and	3.10	1,178.00
SIGMUND ROGICH OS	38537,0004		1/22/2019	Daniel Mauf	Continue preparing		792.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	38537.0004	Nanyah Veges, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	1/23/2019 1/23/2019	Samuel Lionel Daniel Maul	Review Continue preparing	3.00 <b>\$</b> 8.30 <b>\$</b>	1,396.00

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20057 COCH Naryan Vegat, LLC V. Electronic Natl., LLC V. Electronic Nat	338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004 338537,0004	HAS LLC	225,2019 225,5019 225,5019 225,5019 225,5019 225,5019 225,2019 225,2019				3
	738537,0004 738537,0004 738537,0004 738537,0004 738537,0004 738537,0004 738537,0004 738537,0004 738537,0004	HES. LLC	2252019 2252019 2262019 2262019 2262019 2252019 22772019	Dominal Man. 4	ind analysis with Bawise and say		
20257 0004 Namych Vogat, LLC. Educator left, LLC. 2727019 Davie March Namych Vogat, LLC. Educator l	238537 0004 238537 0004 238537 0004 238537 0004 238537 0004 238537 0004 238537 0004 238537 0004	THE CLC	225,2019 225,2019 225,2019 225,2019 227,2019	THE REAL PROPERTY.			368.00
200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harman Vagas LLC & Edocatoch High. LC 20072019 Double May 200507 COOK Harm	298537,0004 238537,0004 238537,0004 238537,0004 238537,0004 238537,0004		2262019 2262019 2262019 22772019	Daniel Mauf Daniel Maus			528.00 0.00
200527.0004 Namyer Vaga. LLC & Borsoo Hall. C. 2020219 Tom Fed Scrool Namyer Vaga. LC & Borsoo Hall. C. 2020219 Tom Fed Scrool Namyer Vaga. LC & Borsoo Hall. C. 2020219 Tom Namyer Vaga. LC & Borsoo Hall. C.	238537,0004 238537,0004 238537,0004 138537,0004 238537,0004	・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・	2262019 2262019 2272019 2272019	Percial Man	Receipt and review of		8
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208527 0000 Namysh Vegas, LLCV Electrosco Hat, LLC 2772019 Percel Maria 1820 1820 1820 1820 1820 1820 1820 1820	138537,0004 138537,0004 038537,0004	HIRS. LLC HIRS. LLC HIRS. LLC HIRS. LLC	227/2019	Daniel Mau	Contractice re- Receipt and review of		4.00 0.34 0.00
28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 22772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 24772019 288287 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 24772019 28827 0000 Narryal Vegas, LLC. Elecendo Hat, LLC 24772019 28827 0000 Narr	038537.0004	HIS. LLC	0100700	Tom Fee	Contrience degarding Weeting to decasts Research and analysis regarding		975.00
208307 0004 Naryah Vegat, LLC. Educatoch Hat, LC. 2772019 Semuel Lone   Pereing and analysis regarding   Pereing and analysis regard	038537.0004	Vegas, LLC.v. Eldorado Hills, LLC. Vegas, LLC.v. Eldorado Hills, LLC. Vegas, LLC.v. Eldorado Hills, LLC.	E1071177				858.00
208257 0000 Harryan Vagati LLC V Edoracio Hills LC 20277019 Samuel Lichone Review Law Parks Nagati LLC V Edoracio Hills LC 20277019 Samuel Lichone Review and Fares an	038537.0004	耄	2/27/2019 2/27/2019	Brenoch Witthlin Daniel Maul	Meeting to discuss i		1,406.00 352.00
20855770004 Naryah Vegat. LLC. Electrodo Hat. LC. 202000 Hat. LC. Electrodo Hat. LC. 202000 Ha	038537.0004		9102/127	Semuel Lionel	Neview	2:00 \$	1,300.00
208537 0004 Naryah Vagat. LLC v. Elecando Hala, L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019 Deniel Mass 1008537 0004 Naryah Vagat. LLC v. Elecando Hala L. 2072019	038537,0004	Ź	2/28/2019	Sumuel Lionel	Review.	200	1,300.00
208537 COOM         Name of Section (Mary In Vegat, LLC.x, Educace) High, LLC         Section of Section (Mary In Vegat, LLC.x, Educace) High, LLC         Chartel Mead         Preview and unalysis regarding         0.50         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LLC         34/2019         Dareis Mead         Reviews and unalysis regarding         0.20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LLC         34/2019         Dareis Mead         Reviews and unalysis regarding         0.20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LLC         34/2019         Samuel Lona         Reviews and unalysis regarding         0.20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LLC         34/2019         Samuel Lona         Prepare         14/20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LC         34/2019         Samuel Lona         Review and maryisi regarding         0.20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LC         34/2019         Persia Mead         Nord on         Nord on         0.20         \$           208537 COOM         Nanyah Vegat, LLC.x, Educace) High, LC         34/2019         Persia Mead         Nord on         Nord on         0.20         \$	138537.0004	4	2/28/2019	Brenoch Withlin	Work on	6 e	304.00
2085577 COCA   Naryah Vagas, LLC v Edorado His, LLC   20/2019   Daviel Must   Review and analysis regarding   Daviel Must   Review and analysis regarding   Daviel Must   Daviel Davie	338537,0004	至	3/1/2019	Deniel Mau	Discussions and analysis regarding	0.50	110.00
028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Tom Feel         Review emails from course inparting         Review         0.20 \$           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Samuel Librae         Review         140 \$         2           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Darwiel May         Prepare         140 \$         3           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Darwiel May         Prepare         140 \$         3         4           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Darwiel May         Review and arabias regarding         0.00 \$         1           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Darwiel May         Review and arabias regarding         0.00 \$         1           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Darwiel May         Review and arabias regarding         0.00 \$         1           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         31/2019         Bremoch Werthin         Review and approve         0.00 \$         1           028537 0004         Naryah Vagas, LLC.× Ekorado Hile, LLC         34/2019	038537 0004	1	3/1/2019	Deniel Maul	Review and analysis regarding. Review and analysis reparding	0.20 0.20 0.20 0.20	44.00 0.00 0.00 0.00
1008537,0004   Nanyah Vegas, LLC.v. Edorado Hist, LLC   31/2019   Samuel Lone   Review   Re					Review emails from counsel regarding	,	
028537 0004         Namyah Vagas, LLC.v. Edoracio Hãs, LLC         34/2019         Samuel Local         Research         1.40         \$         2         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         2         0         \$         1.40         \$         1.40         \$         3         4         0         \$         1.40         \$         3         4         0         \$         1.40         \$         3         4         0         \$         1.40         \$         1.40         \$         3         4         0         6         6         6         6         6         6         6         6         6         6 <t< td=""><td>0.38557.0004</td><td></td><td>81027176</td><td>Tom Fe</td><td></td><td></td><td>30.00</td></t<>	0.38557.0004		81027176	Tom Fe			30.00
028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         166         3           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         Conference call with         0.50         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         Conference call with         0.50         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         Nord on Example regarding         0.50         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         Preparation of Example regarding         0.50         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Brenoch Wirthin         Preparation of Example regarding         0.50         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Darial Maul         Preparation of Example regarding         0.10         5           028537.0004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/2019         Samuel Loral         Samuel Loral         Samuel Loral         Samuel Loral           028537.00004         Naryah Vegas, LLC.v. Elocrado Hila, LC         34/	038537,0004		3/1/2019	Samuel Lional Darrief Meul	Prepare		308.00
038537 0004         Naryah Vegas, LLC.v. Eldorado Hila, LLC         34/2019         Brenoch Wirthin         Confirmence         Confirmence         Confirmence         2.00 \$         3.40 \$         0.50 \$         3.40 \$	038537,0004		3/1/2019	Brenoch Wirthilin	Kekearch		608.00
038537 0004         Naryah Vegas, LLC.v. Edorado Hás, LLC         34/2019         Ton Fell         Commence	038537,0004		3/2/2019	Brenoch Wirthlin	Work on		1,282,00
038537 0004         Naryah Vegas, LLC.v. Edorado Hila, LC         34/2019         Deniel Maui         Review and analysis regarding         2.00 \$         \$         1.20 \$         \$         1.00 \$         \$         \$         1.00 \$         \$         1.00 \$         \$         \$         1.00 \$         \$         \$         1.00 \$         \$         \$         1.00 \$         \$         \$         1.00 \$         \$         \$         \$         1.00 \$         \$         \$         \$         \$         \$         \$         1.00 \$         \$         \$         \$         \$         \$         \$         \$         \$         \$         \$         \$         \$         \$         \$			344/2019	Tom Fell			325.00
028537 0004         Naryah Vegas, LLC.v. Edorsko Hills, LLC         34/2019         Brenoch Wirtlin         210 \$           028537 0004         Naryah Vegas, LLC.v. Edorsko Hills, LLC         35/2019         Daviel Maryah         Preparation of Recept and review and analysis regarding         210 \$           038537 0004         Naryah Vegas, LLC.v. Edorsko Hills, LC         34/2019         Samuel Lönel         Review and analysis regarding         0.30 \$           038537 0004         Naryah Vegas, LLC.v. Edorsko Hills, LC         34/2019         Suean Rader         200 \$	038537,0004	重量	3/4/2019 3/4/2019	Samuel Lionel Deniel Maul	Commence Review and onsulysis regarding		1,300.00
038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         34/2019         Brancot Nvitrish         Preparation of memory in Vegas, LLC.v. Edorado Hills, LLC         34/2019         Brancot Nvitrish         Preparation of memory in Vegas, LLC.v. Edorado Hills, LLC         34/2019         Brancot Nvitrish         Correspondence regarding         0.00         \$           038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         34/2019         Brancot Nvitrish         Correspondence regarding         0.10         \$           038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         34/2019         Samuel Lichas         Review and analysis regarding         2.00         \$					Work on Continue		
038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         3452019         Daniel Maul         Correspondence regarding         0.30         \$           038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         3452019         Samuel Licnel         Request for Review and analysis regarding         2.00         \$         1,5           038537.0004         Nanyah Vegas, LLC.v. Edorado Hills, LLC         3452019         Suean Rader         Request for Review and analysis regarding         0.30         \$	038537,0004		3442019 3552019	Brenoch Wirthlin Samuel Lional	Preparation of	2.10 <b>\$</b> 1.00 <b>\$</b>	788.00 650.00
Naryah Vegas, LLC v. Eldorado Hits, LLC 3/6/2019 Samuel Lional Request for Request for Samuel Lional Request for Region Re			3/5/2019 3/8/2019	Daviet Maul Brenoch Wirthlin	Correspondence regarding		98.00 38.00
Nenysh Vegas, LLC.v. Eldorado Hits, LLC 3/8/2019 Supen Rader  Review and analysis regarding	039537,0004		3/6/2019	Semuel Lional	Nevew Kr. Spyrove		1,300.00
	038537,0004		346/2019	Susan Rader	Kequest for		80.08
					Review and analysis regarding		

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Client Name	Matter	Metter Name	Work Date	Timekeeper Name	Nazrative	Hours	Amount Task
SIGMUND ROGICH ( SIGMUND ROGICH ( SIGMUND ROGICH (	038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3772019 3772019 3772019	Tom Fell Tom Fell Daniel Maul	Conference call with Review and revise Review and energies regarding	1.80 0.40 \$ \$ \$ \$	888 888
SIGMUND ROGICH ( SIGMUND ROGICH ( SIGMUND ROGICH (	038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eidomdo Hills, LLC Nanyah Vegas, LLC.v. Eidomdo Hills, LLC Nanyah Vegas, LLC.v. Eidomdo Hills, LLC	37/2019 37/2019 3/8/2019	Brenoch Wirthän Daniel Maul Daniel Maul	Continue working on Research Recept and releasi	0.20 0.20 50 55 50 55	1,064.00 44.00 110.00
SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH SKANIND ROGCH	038537,0004 038537,0004 038537,0004 038537,0004 038537,0004 038537,0004 038537,0004	Namyah Vagas, LLC v. Eldonado HRs. LLC	3/8/2019 3/8/2019 3/4/2019 3/4/2019 3/4/2019 3/4/2019	Daniel Maul Tom Fell Samuel Lonel La Delnegro Daniel Maul Brancel Wettigh Samuel Lonel Tom Fell	Recipit and review of Review and analysis of Research Research Review and analysis ogediting Conference with Conference with	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	85.00 325.00 1,180.00 1,10.00 286.00 772.00 195.00
SIGMUND ROGICH	038537.0004		3/12/2019	Brenoch Wirthlin	Work on Receipt and review		838.00
SIGMUND ROGICH C SIGMUND ROGICH C SIGMUND ROGICH C SIGMUND ROGICH C	038537,0004 038537,0004 038537,0004 038537,0004	Naryan Vegas, LLCv. Eldorado Has, LLC Naryah Vegas, LLCv. Eldorado Has, LLC	3732019 3732019 3732019 3732019	Daniel Metal Branoch Withlan Tom Fell Samual Lonel Deniel Maud	Work on preparing for Work on issues neither Work on issues neither Review Review and discuss Prepare and draft	0.20 0.31 0.50 0.50 8 8 8 8 8 8	44.00 1,178.00 325.00 1,625.00 264.00
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	038537,0004 038537,0004 038537,0004	Naryah Vegas, LLC.v. Eldorado Heis, LLC Naryah Vegas, LLC.v. Eldorado Heis, LLC Naryah Vegas, LLC.v. Eldorado Heis, LLC	3/13/2019 3/14/2019 3/14/2019	Daniel Maud Daniel Maud Daniel Maud	Prepare for Continue revising Continue revising Research is a Manager of Research is a Manager o	0.30 0.30 0.30 8 8	440.00 86.00 110.00
SIGMUND ROCKCH	038537,0004	Nanyah Veges, LLC.v. Eldoredo	3/14/2019	Branoch Wirthlin		5.40 \$	2,052.00
SIGMUND ROGICH C	038537.0004 038537.0004 038537.0004		3/14/2019 3/14/2019 3/15/2019	Daniel Maul Daniel Maul Tom Fell	Research and analysis Review and analysis regarding Strategy conference regarding	5.00 0.20 1.00 5	1,100,00 44,00 650,00
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	3/15/2019	Samuel Llonel	Continue preparing for	4.00	2,800.00
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Nanyah Vegas, LLC.v. Eldorado	3/15/2019	Branoch Wirthlin Daniel Maul	issues related Meeing to discuss Work on preparation for	4.10 \$ 1.20 \$	1,558.00 264.00
SKAMUND ROGICH 038537,0004 SKAMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Ektorado Hils, LLC Nanyah Vegas, LLC.v. Ektorado Hils, LLC	3/16/2019	Brenoch Wirthlin Daniel Maul	Meeting to discuss  Research and analysis regarding  Continue working on	2.10 \$	788.00
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	C38537,0004 C38537,0004 C38537,0004	Naryah Vegas, LLC.V. Eldorado Hills, LLC Naryah Vegas, LLC.V. Eldorado Hills, LLC Naryah Vegas, LLC.V. Eldorado Hills, LLC	3/18/2019 3/19/2019 3/19/2019	Brenoch Wichtin Tom Fell Brenoch Wichlin	Work Review	2.10 2.10 3.00 5.00 5.00 5.00	912.00 650.00 798.00
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3/19/2019	Daniel Meu	Prepare for and attend  Correspondence regarding same.	9.1 \$	220.00
SIGMUND ROGICH	038537,0004		3/20/2019	Brenoch Withlin	Continue working on Attendance at hearing	9.30 \$	3,534,00
SIGMUND ROCKCH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	3202019	Semuel Llonel		3.00	1,850.00

Chert Name	Matter	Matter Name	Work Date	Timekeaper Name	Namtive	Hours	Amount Task	
					Receipt and review of			1
SIGNUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilfs, LLC	3/20/2019	Deniel Mard	Pantarananananin	1.20 \$	284.00	
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3/20/2019	Tom Fell	Shara Britan Bri	0.70	455.00	
SIGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC	3/20/2019	Deniel Maul	Attend hearing o	3.50 \$	770.00	
SKGMUND ROGICH SKGMUND ROGICH	038537,0004	Neryah Vegas, LLC.v. Ektorado Hills, LLC Nenyah Vegas, LLC.v. Ektorado Hills, LLC	3212019 3212019	Daniel Mau Tom Fal	Meeting with Review Review	1.80 *	336.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3/21/2019	Samuel Lionel		2.80 \$	1,820.00	
SIGNUND ROGICH O SIGNUND ROGICH O SIGNUND ROGICH O SIGNUND ROGICH O	038537.0004 038537.0004 038537.0004 038537.0004	Naryah Vegas, LLC.v. Eldorado Hās, LLC.	3212019 3212019 3222019 3222019	Brenoch Withilin Cleriel Mauf Tom Fell Tom Fell	Review and analysis Review and analysis Review tensoript from	6.00 0.20 0.90 0.90 0.90 0.90 0.90	2,48,00 98,50 00,00 195,00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3/22/2019	Daniel Maul	Review and analysis of	1.10 \$	242.00	
SIGMUND ROGICH	000537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	322/2019	Semuel Lionel	Conference with	3.00	1,950.00	
SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	28537,0004 28537,0004 28537,0004 28537,0004	Navyah Vegas, LLC.v. Ekocrado Hills, LLC Naryah Vegas, LLC.v. Ekocrado Hills, LLC Navyah Vegas, LLC.v. Ekocrado Hills, LLC Navyah Vegas, LLC.v. Ekocrado Hills, LLC Naryah Vegas, LLC.v. Ekocrado Hills, LLC	37272019 37272019 37272019 37272019	Deniel Mauf Darviel Mauf Darviel Mauf Semuel Lonel Brenoch Witthin	Revise Revisew and analysis of Revisew Contrare working of	0.000±8 0.0000 0.0000 0.0000 0.0000	188.00 44.00 110.00 650.00 1,254.00	
SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	322/2019	Dariel Mau		2.40 \$	528.00	
SIGMUND ROCICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	3/23/2019	Brenoch Withlin	Control researching, dratting and revising	3.80	1,444.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Namyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	3/25/2019 3/25/2019	Samuel Lionel Daniel Maux	Preparation to Receipt and review of	2.00 0.50 \$	1,300.00	
SIGMUND ROGICH	038537,0004	Nanysh Vegas, LLC.v. Bidorado Hils, LLC	3/25/2019	Daniel Mauf	Meeting wit	8.00	1,320.00	
SIGMUND ROGICH O	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Eldorado HEs, LLC Nanyah Vegas, LLC.v. Eldorado HEs, LLC Nanyah Vegas, LLC.v. Eldorado Hes, LLC	325/2019 3/26/2019 3/26/2019	Brenoch Wirthân Darnief Mauf Liz Deinegro	Continue Receipt and review of Research	2.4.20 2.20 2.00 2.00 3.00 3.00 3.00 3.00 3	1,596.00 44.00 377.00	
SIGMUND ROGICH (SIGMUND ROGICH	038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	3262019 3262019 3262019	Brenoch Wirthän Samuel Lionel Daniel Maul	Conference with	3,40 \$ 0,20 \$	1,292.00 650.00 44.00	
SIGMUND ROCICH SIGMUND ROCICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hilis, LLC Nanyah Vegas, LLC.v. Eldorado Hilis, LLC	3/26/2019 3/27/2019	Deniel Maul Daniel Maul	LAW BURBEAN	4.60 \$	1,012.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	3272019 3272019 3272019 32772019	Operate Man	wir. Ind review of  Ind death Not observed to  Request for	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	110.00 85.00 88.00 352.00	
SIGMUND ROGICH	1 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC	3/27/2018	Brenoch Wirthlin	Volk on Prepare Prepareton of	7.70 \$	2,925.00	
SKGMUND ROGKCH SKGMUND ROGKCH SKGMUND ROGKCH SKGMUND ROGKCH	1 038537.0004 1 038537.0004 1 038537.0004 1 038537.0004	Neryah Vegas, LLC.v. Edoraco His, LLC Neryah Vegas, LLC.v. Edoraco His, LLC Naryah Vegas, LLC.v. Edoraco His, LLC Naryah Vegas, LLC.v. Edoraco His, LLC	3/27/2019 3/28/2019 3/28/2019 3/28/2019	Semuel Lonel Ton Fell Daniel Maul Semuel Lonel	Conference with Prepare for Preparation for	2.00 4.00 00	2,800.00 3,865.00 1,862.00 3,250.00	

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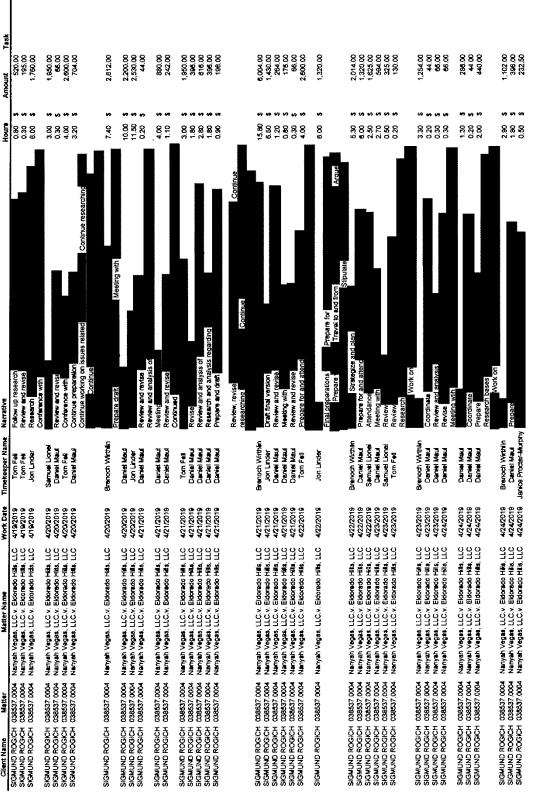
Client Name Matter	r Matter Name	Work Date	Timekeeper Name	Narradive	Hours	Amount	Tesk
				Work on Stratects related to Continue researching Continue researching			
SIGMUND ROGICH 038537 0004 SIGMUND ROGICH 038537 0004	004 Nanyah Vegas, LLC.v. Eldorado Hits, LLC 004 Nanyah Vegas, LLC.v. Eldorado Hits, LLC	452019	Brenoch Wirthlin Tom Feit		8.40 s	3,182.00 975,00	
				Continue working on Strategize and prepare Continue working on issues related to Continue Continue	_		
SIGMUND ROGICH 038537,0004	004 Namyan Vegas, LLC・v Edonado Hás, LLC	4452019	Brenoch Withlin	Continue working on issues related Continue working on issues related to Continue strategizing and preparing	3.10 \$	1,178.00	
SIGMUND ROGICH 038537,0004	1004 Narryah Vegas, LLC.v. Eldorado Hills, LLC	4/8/2019	Branoch Wirthlin		5.40 \$	2,062.00	_
SIGMUND ROGICH 038537,0004	1004 Narrysh Vegas, LLC.v. Eldorado Hills, LLC	4/8/2019	Semuel Llonal	KEVIEW Portien as racidement	2.60 \$	1,625.00	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	004 Narysh Vegas, LLC.v. Eldorado Hils, LLC 004 Narysh Vegas, LLC.v. Eldorado Hils, LLC	4/8/2019	Deniel Meul Deniel Meul	Common programmy  Control of the con	5.60 S 0.20 S	1,232,00	
SKAMUND ROGACH 038537 0004	004 Naryah Vegas, LLC.v. Eldoraco His, LLC	4/9/2019	Ton Fel	Continue  Continue  Continue  Continue	030	195.00	
SIGMUND ROGICH 038537,0004	XXX4 Nanyah Veges, LLC.v. Eldoredo Hila, LLC	4/9/2019	Brenoch Wirthlin	Review	2.80	3,002.00	
SIGMUND ROGICH 038537,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/8/2019	Semuel Lional	Walkel	3.50	2,275.00	_
SIGMUND ROGICH 028537,0004 SIGMUND ROGICH 028537,0004 SIGMUND ROGICH 028537,0004 SIGMUND ROGICH 028537,0004	004 Naryah Vegas, LLC.v. Bidorado Hilis, LLC 0004 Naryah Vegas, LLC.v. Bidorado Hilis, LLC 0004 Naryah Vegas, LLC.v. Bidorado Hilis, LLC 0004 Naryah Vegas, LLC.v. Bidorado Hilis, LLC	4/8/2019 4/8/2019 4/8/2019	Daniel Maus Daniel Maus Daniel Maus Daniel Maus	Review and analysis of Cooperate of Prepare and draft Prepare and draft Prepare and craft	0.60	352.00 132.00 44.00	
SIGMUND ROGICH 038537,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hila, LLC	4/9/2019	Daniel Maus	Weeting With	0.40	88.00	_
SIGMUND ROGICH 038637,0004 SIGMUND ROGICH 038537,0004	2004 Narryah Vegas, LLC.v. Eldorado Hills, LLC 2004 Narryah Vegas, LLC.v. Eldorado Hills, LLC	4/3/2019	Deniel Mau: Brenoch Wirthlin	Oracles No.	0.20 \$	44.00 608.00	
SIGMUND ROGICH 038537.0004	X04 Nanyah Vegas, LLC.v. Eldorado Hilla, LLC	4/10/2019	Daniel Maus	Continue drafting	3.20 \$	704.00	_
SIGMUND ROGICH 038537,0004	XXX4 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/10/2019	Daniel Maul	F 3 3 7 7 8 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	0.30	68.00	
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	2004 Nanyah Veges, LLC.v. Edorado Hils, LLC 2004 Nanyah Veges, LLC.v. Edorado Hils, LLC	4/10/2019	Daniel Mauf Daniel Mauf	Receipt and review of confidence of Confiden	0.20	4.4 8.8	
SIGMUND ROGICH 038637,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/11/2019	Deniel Maul	Cortine dating	11.90 \$	2,618.00	
SIGMUND ROCKCH 038537 0004 SIGMUND ROCKCH 038537 0004	0004 Nanyah Vegas, LLC.v. Edorado Hils, LLC 2004 Nanyah Vegas, LLC.v. Edorado Hils, LLC	4/11/2019	Certal Marul Tom Fell	Receipt and review Research and analysis Contrarens Contrarens Contrarens Continue researchind	300	68.00 1,950.00	
SIGMUND ROCICH 038537,0004 SIGMUND ROCICH 038537,0004	2004 Nanyah Veges, L.C.v. Eldorado Hills, L.C. 2004 Nanyah Veges, L.C.v. Eldorado Hills, L.C.	4/11/2019 4/11/2019	Srenoch Wathlin Samuel Lionel	Conterince with	10.30 <b>\$</b> 2.50 <b>\$</b>	3,914,00	

Client Name Matter	r Metter Rame	Work Date	Timekeeper Name	Narrative	Hours	Amount Task
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SIGMUND ROGICH 038537.0004	004 Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/12/2019	Semuel Lionel	Continue working on issues related to Continue researching Continue	4.00 S	2,600,00
SIGNUND ROCICH 038537,0004	1004 Ninnysh Vegas, LLC.v. Eldorado Hills, LLC	4/12/2019	Branoch Wirthlin	- Control of the cont	8.30 \$	3,154.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	004 Naryah Vegas, LLC.v. Ekorado Häs, LLC 0004 Naryah Vegas, LLC.v. Ekorado Häs, LLC 0004 Naryah Vegas, LLC.v. Ekorado Häs, LLC 0004 Naryah Vegas, LLC.v. Ekorado Häs, LLC	4/12/2019 4/12/2019 4/12/2019	Liz Deinegro Ton Feil Deniel Mauf Deniel Mauf	Voork on Voork on Voork on Voork on Voork on Review and revise.	2.20 1.20 0.30 5.80 5.80 5.80 5.80 5.80 5.80 5.80 5.8	580.00 1,365.00 2,618.00 66.00
				Continue researching		
SIGMUND ROCICH CRESS7,0004 SIGMUND ROCICH CRESS7,0004 SIGMUND ROCICH CRESS7,0004 SIGMUND ROCICH CRESS7,0004	NOA Nanyah Vegas, LLC.v. Eldorado Hils, LLC NOA Nanyah Vegas, LLC.v. Eldorado Hils, LLC NOA Nanyah Vegas, LLC.v. Eldorado Hils, LLC NOA Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/13/2019 4/13/2019 4/14/2019 4/15/2019	Brenoch Wirthlin Daniel Meul Daniel Maul Tom Fell	Review and analysis of Continue preparing of Continue preparation of	4.2.2.0 6.80 8.80 8.80 8.80 8.80 8.80 8.80 8.	1,672.00 972.00 440.00 520.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	2004 Nanyah Vagas, LLC.v. Eldorado Hills, LLC 2004 Nanyah Vagas, LLC.v. Eldorado Hills, LLC	4/15/2019 4/15/2019	Tom Fell Tom Fell	Continue preparing	0.60 0.40 \$	390.00 280.00
				Meetings with		
SIGMUND ROGICH 038537.0004	0004 Nanyah Vegas, LLC.v. Ekkorado Hills, LLC	4/15/2019	Daniel Maul	Continue working on Continue	3.00 8	440.00
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	0004 Narryah Vegas, LLC.v. Eldorado Hils, LLC 0004 Narryah Vegas, LLC.v. Eldorado Hils, LLC	4/15/2019	Branoch Withlin Daniel Mau	Continue preparing.	10.10 \$	3,838.00
SKOMUND ROCICH 038537,0004 SKOMUND ROCICH 038537,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hils, LLC 2004 Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/15/2019	Semuel Lional Tom Fett	Conference with Conference with (	5.00 1.70	3,250,00
SIGMUND ROGICH 038537,0004	0004 Nanyah Vegas, LLC.v. Eldoredo Hille, LLC	4/16/2019	Samuel Lionel	Ontigrance remodine	5.00.\$	3,250.00
SIGMUND ROGICH 038537,0004	2004 Naryah Vegas, LLC.v. Eldorado Hills, LLC	4/16/2019	Tom Fes	Contraction is spanning.	0.50	325.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC 2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/16/2019	Liz Dehegro Tom Feil	Research Research	1.10 \$	319.00 280.00
SIGMUND ROGICH 038537,0004 SIGMUND ROGICH 038537,0004	2004 Nanyah Vagas, LLC.v. Eldorado Hills, LLC 2004 Nanyah Vagas, LLC.v. Eldorado Hills, LLC	4/16/2019	Liz Deinegro Tom Feil	nessarch Review and revise : Meeting with	1,00 0.70	290.00
SKGMUND ROGICH 038537.0004	0004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/16/2019	Deniel Mau	Continue working on Continue researching:	2.70 \$	354.00
SKANUND ROGICH 038537,0004 SKANUND ROGICH 038537,0004	2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC 2004 Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/16/2019 4/16/2019	Brenoch Wirthlin Deniel Mauf	Assist with I	14.90 \$	5,682.00
SIGMUND ROGICH 036537,0004 SIGMUND ROGICH 036537,0004 SIGMUND ROGICH 036537,0004 SIGMUND ROGICH 038537,0004	2004 Naryan Vegas, LLC.v. Eldorado Hils, LLC 2004 Naryah Vegas, LLC.v. Eldorado Hils, LLC 2004 Naryah Vegas, LLC.v. Eldorado Hils, LLC 2004 Naryah Vegas, LLC.v. Eldorado Hils, LLC	4/16/2019 4/16/2019 4/16/2019	Jon Linder Tom Fell Daniel Mauf Daniel Mauf	Research and drain Continue drafting Meeting with Continue prepaintig	3.50 0.80 0.210 8.00 8.00	770.80 520.00 462.00 1,320.00

Tesk	3,900,00 647,00 3,900,00 1,650,00	2,242.00 110.00 850.00	880.00 132.00 1,100.00 1,300.00	2,600.00	3,876,00 308,00	946.00 44.00 110.00	8.88 8.89	550.00 44.00	770.00 8980.00 884.00 44.00 44.00	110.00 178.00 418.00 1,590.00	4,332,00
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Hours	2.30 6.00 7.50 8.80 8.80 8.80 8.80 8.80 8.80 8.80 8	8. 0. 0. 0. 0. 0. 0. 0. 0. 0. 0. 0. 0. 0.		8.	10.20 \$	6.30 0.20 0.50 8.80 8.80	2.20 0.30 \$	2.50	8 4 8 2 9 9 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	0.50 8.70 0.80 0.90 0.90 0.90 0.90 0.90 0.90 0.9	11.40 \$
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Marrutive	Prepare review review for the prepare conference with Conference with Work on issues related on issues related to	Receipt and review of Meeting with Meeting with	Prepare Meetino with Attand it Meeting with Review	Work on Correspondence with Continue	Meeting with Raview	Receipt and review	Keview and analysis	Perticipate and attend Prepare and draft Revise draft	Research and write Orart Review and analysis Review and analysis Review and analysis Orart email to	Prepare and oraft Order Continue Coordinate Meeting Continued	Continue Review
Timekeeper Name	Samuel Lionel Lib Deinegro Tom Fell Jon Linder	Brenoch Withfu Daniel Maul Derhel Maul	Deniel Mauf Deniel Mauf Deniel Mauf Serruel Lionel	Tom Fell	Brenoch Wirthlin Daniel Maul	Darriel Maus Derriel Maus Derriel Maus	Daniel Mauf Daniel Mauf	Daniel Maul Daniel Maul	Jon Linder Jon Linder Liz Deinegro Deniel Maul Deniel Maul	Daniel Mau: Daniel Mau: Daniel Mau: Daniel Mau: Tom Fel	Brenoch Wirthlin Samuel Lonel I'r Deform
Work Date	4/17/2019 4/17/2019 4/17/2019 4/17/2019	4/17/2019 4/17/2019 4/17/2019	4/17/2019 4/17/2019 4/17/2019 4/18/2019	4/18/2018	4/18/2019	4/18/2019 4/18/2019 4/18/2019	4/18/2019 4/18/2019	4/18/2019 4/18/2019	4/18/2019 4/18/2019 4/19/2019 4/19/2019 4/19/2019	4/19/2019 4/19/2019 4/19/2019 4/19/2019	4/19/2019 4/19/2019 4/19/2019
Motter Name	Nanyah Vagas, L.C.v. Eldorado Hils, L.C. Nanyah Vagas, L.C.v. Eldorado Hils, L.C. Nanyah Vagas, L.C.v. Eldorado Hils, L.C. Nanyah Vagas, L.C.v. Eldorado Hils, L.C.	Nanyah Vegas, LLC.v. Ekorado Hills, LLC Nanyah Vegas, LLC.v. Ekorado Hills, LLC Nanyah Vegas, LLC.v. Ekorado Hills, LLC	Naryah Vegas, LLC v. Eidorado Hist, LLC Naryah Vegas, LLC v. Eidorado Hist, LLC Naryah Vegas, LLC v. Eidorado Hist, LLC Naryah Vegas, LLC v. Eidorado Hist, LLC	Nanyah Vegas, LLC.v. Eldoredo Hiss, LLC	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	Narryah Vagas, LLC.v. Ektorado Hila, LLC Narryah Vagas, LLC.v. Ektorado Hila, LLC Narryah Vagas, LLC.v. Ektorado Hila, LLC	Nanyah Vegas, LLC.v. Eldorado Hits, LLC Nanyah Vegas, LLC.v. Eldorado Hits, LLC	Nanyah Vegas, LLC.v. Edorado Hiss, LLC Nanyah Vegas, LLC.v. Edorado Hiss, LLC	Maytah Vagas, L.C., Eldonsob Hai, L.C. Nanyah Vagas, L.C. Eldonsob His, L.C.	Naryah Vegas, LLC.v. Eldorado Häs, LLC Naryah Vegas, LLC.v. Eldorado Hils, LLC Manyah Vegas, LLC.v. Eldorado Hils, LLC Naryah	Nerryah Voges, LLC.v. Eldorado Has, LLC Narryah Voges, LLC.v. Eldorado Has, LLC Narryah Voges, LLC.v. Eldorado Has, LLC
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SIGMUND ROCICH 038637,0004	038637,0004	Nanyan Vegas, LLC.v. Eldorado Hills, LEC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4252019 4252019	Branoch Wirthin Tom Feil	Review and revise Recearch	5.80 0.10	\$ 2,204.00 \$ 65.00	504.00 65.00
SIGMUND ROGICH		Neryah Vegas, LLC.v. Eldorado Hits, LLC Neryah Vegas, LLC.v. Eldorado Hits, LLC	4/25/2019	Liz Demegro Samuel Lional	Research	2.60	764.00	8,8
SIGNIUND ROGICH 038637,0004		Namyah Vagas, LLC.v. Eldorado Hills, LLC	4/28/2019	Semuel Lionel	Prepare	2.00		8
		region veges, according to	#404401B	Data Control	Continue researching Wink on	9 <del>7</del> 0		8
SKRMUND ROCKCH 038537.0004	038537,0004	Nerryah Vegas, LLC.v. Eldorado Hills, LLC	4/27/2019	Brenoch Wirthlin		3,90	\$ 1,482.00	8
SIGNIUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/29/2019	Daniel Meur	Meeting William Assist in Assista in Assist in			594.00
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SKGMUND ROGICH	038537,0004	Nanyah Vegas, ELC.v. Eldorado Hilla, LLC.	4/28/2019	Daniel Meul		0.50	110	110.00
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	4/30/2019	Daniel Meud	s regarding Discussions and analysis with	0.30	8	96.00
SKIMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	4/30/2019	Daniel Meul	recept, if a lover of	0.70	<b>*</b> 25	154.00
SIGMUND ROGICH SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Ektorado Hilis, LLC Nanyah Vegas, LLC.v. Ektorado Hilis, LLC	4/30/2019 5/1/2019	Brenoch Within Tom Fell	Work on a	2.60 0.80	22.5	968.00 520.00
SIGMUND ROGICH	038537,0004	Nanysh Vegas, LLC.v. Eldorado Hills, LLC	5/1/2019	Liz Deinegro	research Review proposed	5.20	\$ 1,508.00	8
SKEMUND ROGICH 038537,0004 SKEMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC Nanyah Vecas, LLC.v. Eldorado Hits, LLC	6/1/2019	Samuel Lionel Brecorth Withfile	Rectau	5.00	1,300.00	300.00
SIGMUND ROGICH 038537,0004	038537,0004	Narvah Vegas, LLC × Eldomodo Hikk	610010	1000	Receipt and review of			§ 8
			2			070	ν. <del>1</del>	94,00
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SIGMUND ROGICH	738537.0004	Nanyah Vegas, LLC.v. Eldorado Hits, LLC	\$72/2019	Brenoch Wirthlin	Working was	0.70	, <b>,</b>	88
SIGMUND ROGICH 038537,0004	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$222019	Samuel Lionel	Conterence with	3.8	\$ 1.850.00	8
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038337.0004 SIGMUND ROGICH 038537.0004	038537.0004 038537.0004 038537.0004	Nanyah Vegas, LLC.v. Ekorado Hils, LLC Nanyah Vegas, LLC.v. Ekorado Hils, LLC Nanyah Vegas, LLC.v. Ekorado Hils, LLC	5/3/2019 5/3/2019 5/3/2019	Jon Linder Jon Linder Jon Linder	Coat of coats and organize	220 1.80 3.20	2 8 8 5 7 7	484.00 396.00 704.00
SIGMUND ROGICH 038537,0004	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$73/2019	Brenoch Wirthlin	Conditie drainig, researching and revising i	8.20 8.20	3,116.00	8
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SIGMUND ROGICH O SIGMUND ROGICH O SIGMUND ROGICH O	08537,0004 08537,0004 08637,0004	Nanyah Vegas, L.C.v. Ekonado Hits, L.C. Nanyah Vegas, L.C.v. Ekonado Hits, L.C. Nanyah Vegas, L.L.C.v. Ekonado Hits, L.C.	5/3/2019 5/6/2019 5/6/2019	Samuel Lionel Daniel Meul Tom Fell	Receipt and review Review and texts And the second	0.30 0.70 0.70	\$ 2,600.00 \$ 88.00 \$ 455.00	888
SIGMUND ROCKCH SIGMUND ROCKCH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2019 5/8/2019	Daniel Maul Daniel Maul	Transverse and draft.	2.1. 8.1.	223	330.00 220.00
SIGMUND ROGICH SIGMUND ROGICH	038537.0004	Nanyah Vegas, LLC.v. Eldorado Hibs, LLC Nanyah Vegas, LLC.v. Eldorado Hibs, LLC	5/8/2019 5/8/2019	Branoch Wirthin Daniel Mauf	Continue researcaing Receipt and review of	1.70	2 3 4	646.00 00.44
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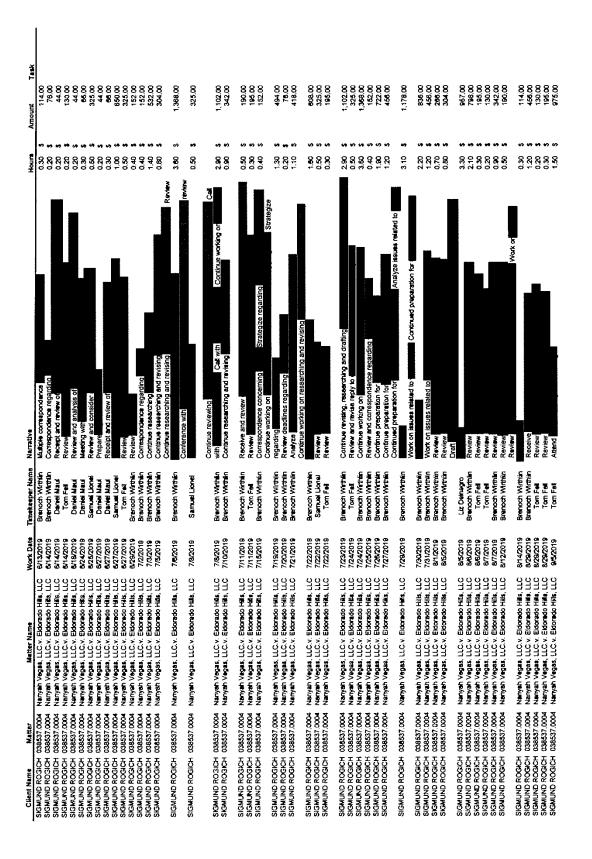
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SIGMUND ROGICH 038537,0004	Nerrysh Veges, LLC.v. Eldorado Hills, LLC	5/6/2019	Daniel Maul	Meeling wilth	1.00	220.00
		\$48/2019	Daniel Maul	Receipt and review Continue researching and working on	0.30	08:00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5772019	Branoch Wirthlin	D Aniban Andre and Investored	3.40 \$	1,282.00
SIGMUND ROGICH 038537,0004	Nanyah Vagas, LLC.v. Eldorado Hills, LLC	5/7/2019	Daniel Merd	Conference and an all all all all all all all all all	0.40 \$	98.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5,77,2018	Tom Fe⊞	Conterence regarding regarding 1	0.80	\$20.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/7/2019	Samuel Lional	Maylan.	3 8.1	650.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2019	Daniel Mauf	Review and analysis of December of Decembe	0.20 \$	44.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldoredo Hifs, LLC	5/8/2019	Daniel Maul		1.30 \$	286.00
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	5/8/2018 5/8/2018	Dantel Maul Daniel Maud	s and analysis	0.70 \$	25.00 24.00
SIGNUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/8/2019	Brenoch Wirthlin	Vortespondence with	1.40 \$	532.00
SIGMUND ROCICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$10Z/6/\$	Daniel Meul	Draft. Commence review of	0.20	44,00
SIGMUND ROGICH 036537,0004 SIGMUND ROGICH 036537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	5/9/2019 5/10/2018	Samuel Lional Daniel Maul	Coordinate Coordinate	1.50 0.20 \$ \$	975.00 44.00
SIGMUND ROCKCH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/10/2019	Brenoch Wirthlin	Continue recent ming, craining and revening Research and arcelvan remotion	4 20 \$	1,596.00
SIGMUND ROGICH 038537,0004	Nenyah Vegas, LLC.v.	5/10/2019	Daniel Mau		0.20	97,70
SIGNUND ROCKCH 038537,0004	Nanyah Vegas, LLC.v.	5/10/2019	Daniel Mau	Receipt and review of	80	98
SIGMUND ROGICH 038537,0004		5/10/2018	Daniel Mad	Recipies and accelerations		220.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$13/2019	Daniel Maul	Receipt and analysis regarding Receipt and review of	88	# <del>1</del>
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	\$113/2019	Daniel Mau	exchange errains with	0.30 \$	96.00
SIGMUND ROCHCH 038537,0004	Nanysh Vegas, LLC.v. Eldorado Hills, LLC	5/14/2019	Daniel Mau	Meeting with	0.20	44.00
SIGMUND ROOKCH 038637,0004	Narvah Vecas, LLC.v. Eldorado Ella, ELC.	573472019	Denies Mer	Review and analysis of	8	8
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v.	5/15/2019	Daniel Mau	Review and analysis regarding	9	88.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v	6/15/2019	Daniel Maul	Review and analysis of Receipt and review of	<b>\$</b>	44.00
SIGNUND ROGICH 038637,0004	Nanyah Vegas, LLC.v	5/16/2019	Daniel Maus		0.20	6,19
SIGMUND ROCICH 038537,0004	Namysh Vegas, LLC.v. Extoration rate, LtC.	6/17/2019	Denies Maus	work on research Meeting with	5.5 8. e.	352.00
SIGNUND ROGICH 638537 0004	VOLT spoot Veves	6/17/20119	Benoch Watten	Review	5	8
SIGMUND ROGICH 038537,0004		\$202019	Brenoch Wirthlin	Work on issues related to	. s	342.00
SIGMUND ROGICH 038537,0004	Nanysh Veges, LLC.v. Eldonado Hills, LLC	\$21/2018	Daniel Mauf	Necelpt and review	0.20	4.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/21/2019	Daniel Maul	Concentration in the second se	0.20	44.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/21/2019	Brenoch Wirthlin	work on issues related to		190.00
SIGMUND ROGICH 038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC	5/21/2019	Daniel Meol	Prepare and draft Receipt and review of	128 8	264.00
SIGMUND ROGICH 038537.0004 SIGMUND ROGICH 038537.0004	Nanyah Vegas, LLC.v. Ektorado Hills, LLC Nanyah Vegas, LLC.v. Ektorado Hills, LLC	\$722/2019 \$722/2019	Daniel Maul Daniel Maul	Review and analysis regarding	0.40	8.8
SIGMUND ROGICH 038537,0004	Narryah Vegas, LLC.v. Eldorado Hills, LLC	\$722/2019	Tom Fell	Neview sipplication regarding t	0.20	130.00
SIGMUND ROGICH 038537,0004	Namrah Vegas, LLC.v.	57222019	Branoch Wirthlin	Continue researching, drafting and nevising	2.50	798.00
SIGMUND ROGICH 038537,0004	Namyah Vegas, LLC.v. Eldorado Hills, LLC	\$232019	Tom Fell	Review		195.00

Last Modified by

Clent Name	Matter	- 1	. Į	Timekeeper Name	Narrative	Hours	Amount Task	_
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Narryah Vegas, LLC.v. Eldorado Hills, LLC Narryah Vegas, LLC.v. Eldorado Hills, LLC	5/23/2019 5/23/2019	Daniel Maus Daniel Maul	Receipt and review of Methylogogy by Capacian of Methylogogy by Capacian Methylogogy by Capacian Methylogogy Mychic or issuare related to the capacian of the	0.40 \$	88.00 00.88	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Extorado Hils, LLC Nanyah Vegas, LLC.v. Extorado Hils, LLC	5/23/2019 5/24/2019	Branoch Withlin Liz Dehegro		0.80 0.80 \$	364.00	
SIGMUND ROCKCH 038537,0004 SIGMUND ROCKCH 038537,0004	038537,0004	Narryah Vegas, LLC.v. Extorado Hits, LLC Narryah Vecas, LLC.v. Extorado Hits, LLC	\$242019	Daniel Meul	Correspondence regarding	2.50	550.00	
SIGMUND ROGICH SIGMUND ROGICH			\$242019 \$282019	Jon Linder Deniel Meul	Summarize drating of Review and analysis regarding	5.00 5.00 5.00 5.00 5.00 5.00 5.00 5.00	154.00 44.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vagas, LLC.v. Eldorado Hills, LLC Nanyah Vagas, LLC.v. Eldorado Hills, LLC	\$28/2019 \$/28/2019	Daniel Maul Tom Fell	REVIEW AND ARAIVES TENEROLD OF THE CONTROL OF THE C	0.20 \$	280.00 280.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hils, LLC Nanyah Vegas, LLC.v. Eldorado Hils, LLC	5/28/2019 5/29/2019	Daniel Maul Brenoch Wirthlin	Nescaill ailt ailt ailt ailt	0.20	44.00 152.00	
SIGMUND ROGICH SIGMUND ROGICH	038537,0004	Naryah Vegas, LLC.v. Edorado Has, LLC Naryah Vegas, LLC.v. Edorado Has, LLC	5/29/2019 5/29/2019	Daniel Mauf Daniel Mauf	Receipt and roview of Review and analysis regarding in Receipt and roview of	0.20	44.00 00.	
SIGMUND ROGICH	038537,0004	Naryah Vegas, LLC.v. Eldorado Hils, LLC	5/29/2019	Daniel Maus	Continue	0.20	44.00	
SIGMUND ROGICH	038537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	5/30/2019	Damiel Meul	Beoin	0.20	44.00	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004	Narryah Vegas, LLC.v. Eldorado Hille, LLC Narryah Vegas, LLC.v. Eldorado Hills, LLC Narryah Vegas, LLC.v. Eldorado Hills, LLC	6/30/2019 6/30/2019 5/30/2019	Liz Dehregro Brenoch Wirthin Deniel Mard	Review and analysis of	\$ \$ \$ 09.00 \$ 0.00 \$ 0.00	1,334.00 228.00 44.00	
SIGMUND ROGICH SIGMUND ROGICH	038537.0004	Naryah Vegas, L.C.v. Eldorado Hills, LLC Naryah Vegas, L.C.v. Eldorado Hills, LLC	5/31/2019 5/31/2019	Brenoch Wirthlin Dankel Maul	Work on Correspondence Work	1.30 \$ 0.20 \$	44.00 0.44	
SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH	038537,0004 038537,0004 038537,0004	Nenyah Vegas, LLC.v. Eldorado Hita, LLC Nanyah Vegas, LLC.v. Eldorado Hits, LLC Nanyah Vegas, LLC.v. Eldorado Hits, LLC	5/31/2019 5/31/2019 6/1/2019	Danlei Maul Liz Deinegro Liz Deinegro	Nevir on Action Processors and English States Processors and English States Processors and English States Processors English States Processors English States Processors Process	0.30 \$ 7.90 \$ 0.20 \$	88.00 2,291.00 58.00	
SIGMUND ROGICH	038537.0004	Naryah Vegas, LLC.v. Eldorado Hills, LLC	6/3/2019	Branach Wirthlin		1.80 \$	684.00	
SIGMUND ROGICH (SIGMUND ROGICH	038537.0004 038537.0004 038537.0004 038537.0004	Naryah Vegas, LLC.v. Ekorado Hila, LLC Naryah Vegas, LLC.v. Ekorado Hils, LLC Naryah Vegas, LLC.v. Ekorado Hils, LLC Naryah Vegas, LLC.v. Ekorado Hils, LLC	6/3/2019 6/3/2019 6/3/2019 6/3/2019	Samuel Lionel Deniel Meus Deniel Maus Liz Delnegro	Review and analysis of s Meeting with Review and	0.20 0.20 0.30 2.80 5 5 5 5	650.00 44.00 66.00 74.00	
SIGMUND ROGICH (SIGMUND ROGICH (SIGMUND ROGICH SIGMUND ROGICH SIGMUND ROGICH (SIGMUND ROGICH (	038537.0004 038537.0004 038537.0004 038537.0004	Naryah Vagas, LLC v. Edorado Has, LLC Maryah Vagas, LLC v. Edorado Has, LLC Naryah Vagas, LLC v. Edorado Has, LLC	6/3/2019 6/3/2019 6/4/2019 6/5/2019	Daniel Maul Tom Felt Daniel Maui Brenoch Wirthlien Brenoch Wirthlien	Robert and revise Robert and revise Work on issues related Cast 1	0.20 0.20 0.30 0.30 0.30 0.30 0.30 0.30	26.09 26.09 26.44.1 26.00 26.44.1 26.00 26	
SIGNUND ROGICH ( SIGNUND ROGICH ( SIGNUND ROGICH (	036537,0004 038537,0004 038537,0004	Nenyah Vegas, LLC.v. Eldorado Hiss, LLC Nenyah Vegas, LLC.v. Eldorado Hiss, LLC Nenyah Vegas, LLC.v. Eldorado Hiss, LLC	6/6/2019 6/6/2019 6/7/2019	Daniel Maui Branoch Wirthlin Tom Feli	Review and analysis regarding Call regulating Work on Review research Review analysis researching	0.20 1.10 \$ \$ \$	44.00 418.00 130.00	
SIGMUND ROGICH SIGMUND ROGICH	38537.0004 38537.0004	Narryah Vegas, LLC.v. Eldorado Hils, LLC Narryah Vegas, LLC.v. Eldorado Hils, LLC	6772019 6772019	Dental Maul Brenoch Wirthlin	Work on Review and analysis recarding	0.00	44,00 228.00	
SIGMUND ROGICH OF SIGMUND ROGI	28537,0004 28537,0004 28537,0004 28537,0004 28537,0004	Norgah Vegas, LLC. Edorado Hile, LLC Norgah Vegas, LLC. Edorado Hile, LLC Norgah Vegas, LLC. Edorado Hile, LLC Norgah Vegas, LLC. Edorado Hila, LLC Norgah Vegas, LLC. Edorado Hila, LLC	6/10/2019 6/11/2019 6/11/2019 6/12/2019 6/13/2019	Daniel Maul Brenoch Wirthlin Brenoch Wirthlin Daniel Maul Daniel Maul	Work on 1 Work on 3 Recapts and review of t Exchange	0.20 0.60 0.20 0.20 0.20 0.20	44.00 418.00 44.00 44.00	

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2	Clent Name	Matter	Matter Name	Work Date	Timekeeper Name	Nattative	Hours	Amount Tank
His. LLC	SIGMUND ROGICH 030	8537.0004		9/5/2018	Brenoch Wirthlin	Prepare for and attend		80
Hish   LLC   97102019   Samuel Llores    Work on issues related to   Research   1.10   \$   \$   \$   \$   \$   \$   \$   \$   \$	SIGMUND ROGICH 034	8537.0004	Narryah Vegas, LLC.v. Elocrado Hits, LLC	9/9/2019	Brenoch Wirthlin	Work on issues related to. Review		722.00
Hish. LLC   91122019   Bremoch Worthin   Work on issues related to   Research   Hish. LLC   91122019   Bremoch Worthin   Work on issues related to   Research   Hish. LLC   91122019   Bremoch Worthin   Work on issues related to   Research   Hish. LLC   91122019   Bremoch Worthin   Work on issues related to   Research   Hish. LLC   91122019   Bremoch Worthin   Review   Work on issues related to   Research   Hish. LLC   9122019   Bremoch Worthin   Review   Work on issues related to   Research   Hish. LLC   9122019   Bremoch Worthin   Review   Revi	SIGMUND ROGICH 03:	18537.0004		9/10/2019	Samuel Llonel			000099
High   LLC   9112019   Brenoch Wirthin   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Review   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Review   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Review   Work on issues related to   Research   LLC   9112019   Brenoch Wirthin   Review   Work on issues related to   Review	SIGMUND ROGICH OS	18537,0004		9/10/2019	Branoch Wirthlin	related to		912.00
Hás, LLC         97/2019         Brenoch Wirthin         Work on issues related to learned to work on issues related to learned work on issues related to motion to extend time to respond to writ petition. Research learned work on issues related to motion to extend time to respond to writ petition. Research learned work on issues related to motion to extend time to respond to writ petition. Research learned work on issues related to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to write petition. Research learned to motion to extend time to respond to writ petition. Research learned to motion to extend time to respond to write petition. Research learned to motion to extend time to respond to write to the petition. Research learned to mot	SIGMUND ROCICH OS	18537.0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9/11/2019	Brenoch Wirthlin	ot patries		418.00
Hist. LLC 9/19/2019 Brenoch Worthin Work on issues related to Mork on	SIGMUND ROGICH 03:	18537,0004	Nanyah Vegas, LLC.v. Eldorado Hills, LLC	9/12/2019	Brenoch Wirthlin	related to		908.00
His. LLC 9/19/2019 Brenoch Wirthin Review Work on issues related to Monk on Research Review Work on issues related to Monk on Research Review Work on issues related to Monk on Research Work on issues related to Monk on Issues	SIGMUND ROGICH 03:	18537.0004		9/13/2019	Brenoch Wathin	telated to		932.00
Hish. LLC   9202019   Breinoch Worthan   Review   Revie	SIGMUND ROGICH 03:	18537,0004		9/19/2019	Brenoch Wirthlin	elated to		418.00
His, LLC 9222019 Tom Fel Continue researching and drafting Continue researching Continue resea	SIGMUND ROGICH 83-	18537.0004		9/20/2019	Brenoch Wirthlin			874.00
Hist. LLC 92232019   Ton Fel   Continue researching and drafting   Continue researching	SIGMUND ROGICH 03:	18537.0004		9/20/2019	Chris Byrd			262.50
His, LLC 9232019 Brenoch Wirthin Review and comment on Review Work on issues related to Review Revi	SIGMUND ROSICH 03:	18537.0004		9723/2019	Tom Fed	Kevitw		195.00
Hist, LLC 9/23/2019 Tom Fell Review and comment on Review R	SKAMUND ROSICH 03	18537.0004	Nanyah Vagas, LLC.v. Eldorado	923/2019	Brenoch Wirthlin	Continue researching and oraning	3.80	1,444,00
Hist, LLC 9/26/2019 Brenoch Wirthin Work on issues related to the brespond to writ petition. Research Hist, LLC 9/26/2019 Brenoch Wirthin Work on issues related to the brespond to writ petition. Research Hist, LLC 9/20/2019 Brenoch Wirthin Work on issues related to the brespond to writ petition. Research Hist, LLC 9/20/2019 Brenoch Wirthin Work on issues related to the brespond to writ petition. Research Hist, LLC 10/8/2019 Trinofty Barg Remoch Wirthin Remo	SIGMUND ROSICH OS	8537.0004	Namyah Veges, LLC.v. Eldorado	97372019	Chirts Byrd	Review and comment on	\$ 06.0	157.50
Hitt, LLC 9/26/2019 Brancch Wirthin Work on issues related to the conference Hits, LLC 9/26/2019 Brenoch Wirthin Work on issues related to motion to extend time to respond to writ petition. Research 1/20 \$ 1,148, LLC 9/20/2019 Brenoch Wirthin Work on issues related to motion to extend time to respond to writ petition. Research 1/20 \$ 1,148, LLC 10/8/2019 Trinofty Berg 1/20 \$ 1,148, LLC 10/8/2019 Trinofty Berg 1/20 \$ 1,210 \$ 2,10 \$ 2	SCHOND ROSCH DS	2007.0004		9242019	Tom Fell	THE COLUMN ANY CONTRACT AND THE ANY COMMENT AND COMMEN	0.20	130.00
Hist, LLC 927/2019 Brenoch Withful Work on lastes related to Writing Brenoch Withful Review 1.20 \$ 1.  Hist, LLC 9/30/2019 Brenoch Withful Review 1.20 \$ 2.1	SIGMUND ROSICH 03	18537,0004		9/26/2019	Brenoch Wirthin	Work or extreme that to be a second	8.	722.00
Hills, LLC 9/30/2019 Briemoch Wirtfun Work on listues related to the periods of t	SIGMUND ROSICH 03	98537,0004		9/27/2019	Brenoch Wirthlin	Work on issues related to		1,102.00
HAR, LLC 10/8/2019 Trnothy Berg 10.40 \$	SIGMUND ROSICH 03	38537.0004			Brenoch Wirhlin	Work on issues related to mooth to extend time to respond to writ petition. Research Work on issues related to		798.00
	SIGMUND ROSICH 03	18537,0004		10/8/2019	Timothy Berg		0.40	270.00
							\$ ### <b>#</b>	541,021.50

#### ELECTRONICALLY SERVED 4/2/2020 11:31 AM

#### A-13-686303-C

### DISTRICT COURT CLARK COUNTY, NEVADA

<b>Breach of Contract</b>		COURT MINUTES	March 31, 2020
A-13-686303-C	Carlos Huerta, Plaintiff(s) vs. Eldorado Hills LLC, Defendant(s)		
March 31, 2020	3:00 AM	Status Check	
HEARD BY: Allf, Nancy		<b>COURTROOM:</b> No Location	
COURT CLERK: N	licole McDevitt		
RECORDER:			
REPORTER:			
PARTIES PRESENT:			

#### **JOURNAL ENTRIES**

- COURT FINDS after review a Status Check was set for March 31, 2020 on Chambers Calendar as a follow-up from the January 30, 2020 hearing regarding the (1) Rogich Defendants Motion for Attorneys Fees (the Rogich Motion); and (2) Eliades and TELD, LLC s Motion for Attorneys Fees (the Eliades Defendants Motion). The Court requested an affidavit from counsel for the Eliades Defendants detailing how their requested fees were apportioned between the moving and non-moving clients. Moreover, the Court requested an affidavit from counsel for the Rogich Defendants justifying the redactions and block billings provided for within its motion.

COURT FURTHER FINDS after review that on February 21, 2020, the Declaration of Joseph A. Liebman In Support was filed. Additionally, on February 28, 2020, the Declaration of Bre noch Wirthlin In Support was filed. Nanyah Vegas, LLC s supplements in opposition to the Rogich Motion and Eliades Defendants Motion were filed on March 19, 2020.

COURT FURTHER FINDS after review that in awarding fees, the Court considers (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the PRINT DATE: 04/02/2020 Page 1 of 2 Minutes Date: March 31, 2020

Case Number: A-13-686303-C

#### A-13-686303-C

importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived. Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 349 50 (1969).

COURT FURTHER FINDS after review the Declarations provided by counsel justify the award of fees as requested, and that the Brunzell factors have been satisfied. Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 349 50 (1969).

THEREFORE, COURT ORDERS for good cause appearing and after review of all documents on file, the Rogich Defendants Motion for Fees and Eliades Defendants Motion for Fees are hereby GRANTED. The Eliades Defendants are entitled to all fees requested totaling \$216, 236.35 under the prevailing party attorney s fees provision contained in Section 9(d) of the Membership Interest Purchase Agreement. The Rogich Defendants are entitled to all fees requested totaling \$541,021.50 under N.R.C.P. 68.

COURT FURTHER ORDERS for good cause appearing and after review that Defendants are directed to prepare and submit an order containing detailed findings of fact and conclusions of law (Order) based upon the Court's decision as clarified herein. Defendants are further ordered to provide opposing counsel with the proposed Order on or before April 17, 2020, from which date Plaintiffs shall have ten (10) days to review and approve said Order as to form before the Order is submitted to the Court. The final Orders should be emailed in both word and pdf format to DC27Inbox@ClarkCountyCourts.us.

COURT FURTHER ORDERS that the Status Check set for March 31, 2020 on Chambers Calendar is hereby VACATED.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm

PRINT DATE: 04/02/2020 Page 2 of 2 Minutes Date: March 31, 2020

**Electronically Filed** 4/14/2020 10:56 AM Steven D. Grierson **CLERK OF THE COURT** 

DISTRICT COURT

#### CLARK COUNTY, NEVADA

CASE NO.: A-13-686303-C **DEPT. NO.: XXVII** 

**CONSOLIDATED WITH:** CASE NO.: A-16-746239-C

**NOTICE OF APPEAL** 

Page 1

## SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

Phone: (775) 785-0088

NOTICE IS HEREBY GIVEN that Nanyah Vegas, LLC ("Nanyah"), by and through its attorney Mark G. Simons of Simons Hall Johnston PC, appeals to the Nevada Supreme Court from the Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees and Setting Supplemental Briefing on Apportionment, entered on March 16, 2020.

**AFFIRMATION**: This document does not contain the social security number of any person.

DATED this  $\underline{/ 9}$  day of April, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

MARK-8/SIMONS

Attorneys for Nanyah Vegas, LLC

## SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and EDCR 8.05, I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of the **NOTICE OF APPEAL** on all parties to this action in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the abovereferenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

DATED this | day of April, 2020.

Employee of Simons Hall Johnston PC

**Electronically Filed** 4/22/2020 11:31 AM Steven D. Grierson CLERK OF THE COURT ORDR MARK G. SIMONS, ESO. Nevada Bar No. 5132 MSimons@SHJNevada.com SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, Nevada 89509 Telephone: (775) 785-0088 Facsimile: (775) 785-0087 Attorneys for Nanyah Vegas, LLC 7 DISTRICT COURT 8 CLARK COUNTY, NEVADA 9 CARLOS A. HUERTA, an individual; CARLOS A. CASE NO.: A-13-686303-C 10 HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in DEPT. NO.: XXVII 11 Nevada as assignee of interests of GO GLOBAL, CONSOLIDATED WITH: INC., a Nevada corporation; NANYAH VEGAS, 12 LLC, A Nevada limited liability company, CASE NO.: A-16-746239-C 13 Plaintiffs. 14 SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 15 16 STIPULATION AND ORDER CORPORATIONS I-X, inclusive, 17 Defendants. 18 19 NANYAH VEGAS, LLC, a Nevada limited liability company, 20 Plaintiff, 21 22 TELD, LLC, a Nevada limited liability company; PETER ELIADAS, individually and as Trustee of 23 The Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; IMITATIONS, LLC, a 24 Nevada limited liability company; DOES I-X; and/or 25 ROE CORPORATIONS I-X, inclusive, 26 Defendants. 27 28 Page 1 of 3

Case Number: A-13-686303-C

The Court hereby enters the following order resolving the 8<sup>th</sup> claim for declaratory relief and the 9<sup>th</sup> claim specific performance claims asserted by Nanyah Vegas, LLC ("Nanyah") against Sigmund Rogich, individually and as the trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC (the "Rogich Defendants"). Nanyah is represented by and through its undersigned counsel, Mark G. Simons of SIMONS HALL JOHNSTON PC, and the Rogich Defendants by and through their undersigned counsel Brenoch Wirthlin of HUTCHISON & STEFFEN., and Eldorado Hills, LLC ("Eldorado") by and through its undersigned counsel, Joseph Liebman of BAILEY KENNEDY, hereby stipulate and agree to the following:

1. On April 16, 2019, during the pendency of this matter in the Eighth Judicial District, Nanyah's 8<sup>th</sup> Claim for Declaratory Relief and its 9<sup>th</sup> Claim for Specific Performance, were abandoned by Nanyah.<sup>1</sup> Accordingly, effective as of April 16, 2019, the parties stipulate and agree that Nanyah's 8<sup>th</sup> Claim for Declaratory Relief and its 9<sup>th</sup> Claim for Specific Performance were voluntarily dismissed pursuant to NRCP 41(a)(2) with prejudice.

AFFIRMATION: The undersigned do hereby affirm that this document does not contain the Social Security Number of any person.

DATED this 22nd day of April, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd. F-46 Reno, Nevada 89509

By: \_\_/s/Mark Simons
MARK G. SIMONS, ESQ.
Attorneys for Nanyah Vegas, LLC

<sup>1</sup> See Stipulation and Order Re: October 4, 2019 Decision, attached as Exhibit 1 to Appellant Nanyah Vegas, LLC's Response to Order to Show Cause on file before the Nevada Supreme Court in Appeal no. 79917.

1 A-13-686303-C Consolidated with 2 A-16-746239-C 3 Huerta, et al. v. Rogich, et al. 4 DATED this 22nd day of April, 2020. 5 **BAILEY KENNEDY** 6 8984 Spanish Ridge Avenue 7 Las Vegas, NV 89148-1302 8 9 /s/Joseph Liebman DENNIS KENNEDY, ESQ. 10 JOSEPH LIEBMAN, ESQ. 11 Attorneys for Eldorado Hills, LLC 12 DATED this 22nd day of April, 2020. 13 **HUTCHISON & STEFFEN.** 14 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 15 By: /s/Brenoch Wirthlin 16 **BRENOCH WIRTHLIN** 17 Attorneys for the Rogich Defendants 18 BASED UPON THE FOREGOING, it is hereby ordered and confirmed nunc pro tune 19 that the pursuant to NRCP 41(a)(2), Nanyah's 8th and 9th claims for relief against the Rogich 20 Defendants were voluntarily dismissed with prejudice effective as of April 16, 2019, and, 21 therefore, the Decision entered on October 4, 2019, constituted a full and final decision on all 22 23 claims by Nanyah against the Rogich Defendants. 24 IT IS SO ORDERED this 22ndday of April, 2020. 25 26 27 28 Page 3 of 3

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#### CLARK COUNTY, NEVADA

CASE NO.: A-13-686303-C DEPT. NO.: XXVII

**CONSOLIDATED WITH:** CASE NO.: A-16-746239-C

NOTICE OF ENTRY OF **ORDER** 

Page 1 of 4

# SIMONS HALL JOHNSTON PC 6490 S McCarran Blvd Ste F-46

6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088 PLEASE TAKE NOTICE THAT a Stipulation and Order was entered on April 22, 2020, by the Honorable Nancy L. Alf in this matter. See **Exhibit 1.** 

**AFFIRMATION**: This document does not contain the social security number of any person.

DATED this 27 day of April, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

MARK G. SIMONS

Attorneys for Nanyah Vegas, LLC

## SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and EDCR 8.05, I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of the **NOTICE OF ENTRY OF ORDER** on all parties to this action in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the abovereferenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

DATED this 28 day of April, 2020.

Employee of Simons Hall Johnston PC

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

#### **EXHIBIT LIST**

NO.	DESCRIPTION	PAGES
1	Stipulation and Order	3

Page 4 of 4

## **EXHIBIT 1**

## **EXHIBIT 1**

**Electronically Filed** 4/22/2020 11:31 AM Steven D. Grierson CLERK OF THE COURT 1 ORDR MARK G. SIMONS, ESQ. 2 Nevada Bar No. 5132 MSimons@SHJNevada.com 3 SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, Nevada 89509 5 Telephone: (775) 785-0088 Facsimile: (775) 785-0087 6 Attorneys for Nanyah Vegas, LLC 7 DISTRICT COURT 8 CLARK COUNTY, NEVADA 9 CARLOS A. HUERTA, an individual; CARLOS A. CASE NO.: A-13-686303-C 10 **HUERTA** as Trustee of THE ALEXANDER DEPT. NO.: XXVII CHRISTOPHER TRUST, a Trust established in 11 Nevada as assignee of interests of GO GLOBAL, CONSOLIDATED WITH: INC., a Nevada corporation; NANYAH VEGAS, 12 CASE NO.: A-16-746239-C LLC, A Nevada limited liability company. 13 Plaintiffs. v. 14 SIG ROGICH aka SIGMUND ROGICH as Trustee 15 of The Rogich Family Irrevocable Trust: ELDORADO HILLS, LLC, a Nevada limited 16 STIPULATION AND ORDER liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive, 17 Defendants. 18 19 NANYAH VEGAS, LLC, a Nevada limited liability company, 20 Plaintiff, 21 22 TELD, LLC, a Nevada limited liability company; PETER ELIADAS, individually and as Trustee of 23 The Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich 24 Family Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or 25 ROE CORPORATIONS I-X, inclusive, 26 Defendants. 27 28

Page 1 of 3

Case Number: A-13-686303-C

The Court hereby enters the following order resolving the 8<sup>th</sup> claim for declaratory relief and the 9<sup>th</sup> claim specific performance claims asserted by Nanyah Vegas, LLC ("Nanyah") against Sigmund Rogich, individually and as the trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC (the "Rogich Defendants"). Nanyah is represented by and through its undersigned counsel, Mark G. Simons of SIMONS HALL JOHNSTON PC, and the Rogich Defendants by and through their undersigned counsel Brenoch Wirthlin of HUTCHISON & STEFFEN., and Eldorado Hills, LLC ("Eldorado") by and through its undersigned counsel, Joseph Liebman of BAILEY KENNEDY, hereby stipulate and agree to the following:

1. On April 16, 2019, during the pendency of this matter in the Eighth Judicial District, Nanyah's 8<sup>th</sup> Claim for Declaratory Relief and its 9<sup>th</sup> Claim for Specific Performance, were abandoned by Nanyah.<sup>1</sup> Accordingly, effective as of April 16, 2019, the parties stipulate and agree that Nanyah's 8<sup>th</sup> Claim for Declaratory Relief and its 9<sup>th</sup> Claim for Specific Performance were voluntarily dismissed pursuant to NRCP 41(a)(2) with prejudice.

**AFFIRMATION:** The undersigned do hereby affirm that this document does not contain the Social Security Number of any person.

DATED this 22nd day of April, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd. F-46 Reno, Nevada 89509

By: \_\_\_/s/Mark Simons
MARK G. SIMONS, ESQ.
Attorneys for Nanyah Vegas, LLC

<sup>&</sup>lt;sup>1</sup> See Stipulation and Order Re: October 4, 2019 Decision, attached as Exhibit 1 to Appellant Nanyah Vegas, LLC's Response to Order to Show Cause on file before the Nevada Supreme Court in Appeal no. 79917.

1	A-13-080503-C
2	A-16-746239-C
3	
4	DATED this 22nd day of April, 2020.
5	
6	BAILEY KENNEDY 8984 Spanish Ridge Avenue
7	· II
8	
9	By. <u>18/30seph Lieoman</u>
10	DENNIC VENNEDY EGO
11	Attorneys for Eldorado Hills, LLC
12	
13	DATED this 22nd day of April, 2020.
14	HUTCHISON & STEFFEN. 10080 W. Alta Dr., Suite 200
15	Las Vegas, Nevada 89145
16	By: <u>/s/Brenoch Wirthlin</u>
17	BRENOCH WIRTHLIN  Attorneys for the Rogich Defendants
	Theorems Joi and Rogion Defondants
18 19	BASED UPON THE FOREGOING, it is hereby ordered and confirmed nunc pro tunc
20	that the pursuant to NRCP 41(a)(2), Nanyah's 8 <sup>th</sup> and 9 <sup>th</sup> claims for relief against the Rogich
21	Defendants were voluntarily dismissed with prejudice effective as of April 16, 2019, and,
22	therefore, the Decision entered on October 4, 2019, constituted a full and final decision on all
23	claims by Nanyah against the Rogich Defendants.
24	IT IS SO ORDERED this 22ndday of April, 2020.
25	1 to 00 Otto Ditto and Zamouty of Liprit, 2020.
26	Mannial Alla
27	Nancy L Allf DISTRICT COURT JUDGE
28	
- 11	

**Electronically Filed** 5/4/2020 2:33 PM Steven D. Grierson CLERK OF THE COURT 1 ORDR (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada ORDER GRANTING DEFENDANTS 14 Corporation; NANYAH VEGAS, LLC, A PETER ELIADES AND TELD, LLC MOTION FOR ATTORNEY'S FEES Nevada limited liability company, 15 Plaintiffs. VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited **CONSOLIDATED WITH:** 21 liability company, Case No. A-16-746239-C 22 Plaintiff, VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive,

Page **1** of **4** 

Defendants.

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Defendants Peter Eliades ("Eliades") and Teld, LLC's ("Teld") Motion for Attorney's Fees (the "Motion for Attorney's Fees") originally came before the Court on January 30, 2020. At that time, the Court granted the Motion for Attorney's Fees, but also ordered that Eliades and Teld submit supplemental briefing in the form of an affidavit or declaration from their counsel, showing how their request for \$216,236.25 was apportioned between Eliades, Teld, The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"), and Eldorado Hills, LLC ("Eldorado Hills"), and to what extent Eliades and Teld claimed that apportionment is impracticable due to the interrelationship between the claims and parties. Eliades and Teld's supplemental declaration was filed on February 21, 2020. Nanyah Vegas, LLC ("Nanyah") filed a response to Eliades and Teld's supplemental declaration on March 20, 2020. On March 31, 2020, the Court issued a minute order providing its final ruling on the Motion for Attorney's Fees, which is set forth in detail below.

#### FINDINGS OF FACT

Section 9(d) of the Membership Interest Purchase Agreement (the "MIPA") contains the following prevailing party attorney's fees provision.

In the event that any action or proceeding is instituted to interpret or enforce the terms and provisions of this Agreement, however, the prevailing party shall be entitled to its costs and attorney's fees, in addition to any other relief it may obtain or be entitled to.

- Eliades and Teld are both parties to the MIPA.
- Nanyah sued both Eliades and Teld for alleged breaches of the MIPA. In doing so, Nanyah alleged that it was an intended third-party beneficiary under the MIPA.
- Any finding of fact set forth herein more appropriately designated as a conclusion of law shall be so designated.

#### **CONCLUSIONS OF LAW**

- The Court finds that Nanyah was an intended third-party beneficiary under the MIPA. Thus, Nanyah is bound by Section 9(d) of the MIPA. *Canfora v. Coast Hotels and Casinos, Inc.* 121 Nev. 771, 779, 121 P.3d 599, 604 (2005).
- The Court also finds that Eliades and Teld are the prevailing parties against Nanyah under Section 9(d) of the MIPA, as this Court previously entered summary judgment in their favor

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- and dismissed all of Nanyah's claims against them. Thus, Eliades and Teld are entitled to reimbursement of their reasonable attorney's fees from Nanyah.
- "Generally, in calculating attorney's fees, the court should consider the qualities of the advocate, the character of the work to be done, the work actually performed by the lawyer, and the result." Hornwood v. Smith's Food King No. 1, 107 Nev. 80, 87, 807 P.2d 208, 213 (1991) (citing to Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969)).
- > The Court further finds that Eliades and Teld have fulfilled the *Brunzell* factors above. Specifically, the Court finds that Eliades and Teld's counsel are qualified advocates, that the character of their work and the work performed were reasonable and justified, and that the result they obtained for Eliades and Teld—entry of summary judgment—was successful.
- > The Court also finds that Eliades and Teld's counsel's hourly rates are reasonable in this community for complex commercial litigation and allowed by courts in Nevada for professional services rendered in complex commercial litigation.
- If the Court ultimately determines that apportionment is impracticable because the claims and parties are interrelated, the Court has the discretion to decline apportionment. Mayfield v. Koroghli, 124 Nev. 343, 353-54, 184 P.3d 362, 369 (2008). However, the Court is first required to make a good faith effort to apportion attorney's fees, considering that Bailey Kennedy also represented Eldorado Hills and the Eliades Trust (two non-parties to the MIPA) in this consolidated action.
- The Court therefore requested a supplemental affidavit or declaration from Eliades and Teld's undersigned counsel relating to apportionment. Following this Court's review of the supplemental declaration as well as Nanyah's response thereto, the Court finds that Eliades and Teld apportioned attorney's fees between them and the Eliades Trust/Eldorado Hills (two non-parties to the MIPA) when practicable, such as with respect to a Motion for Summary Judgment filed solely on Eldorado Hills' behalf, which was omitted from Eliades and Teld's request for attorney's fees. For the remainder, the Court finds that it was impracticable to apportion attorney's fees because of the interrelationship between the parties and claims.

➤ Accordingly, the Court finds that Nanyah is obligated to pay \$216,236.25 to Eliades and to
Teld as reimbursement for their incurred attorney's fees.
> Any conclusion of law set forth herein more appropriately designated as a finding of fact
shall be so designated.
<u>ORDER</u>
The Court, having heard oral argument, having reviewed the papers, exhibits, and pleadings
on file, and having considered the same, and for the reasons stated upon the record, GRANTS the
Motion for Attorney's Fees and orders that Nanyah is obligated to pay \$216,236.25 to Eliades and to
Teld. The Court will issue a separate monetary judgment for that amount.
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DATED this 4th day of May, 2020.
1 1 11/
Mancy L Allf' DISTRICT COURT JUDGE
DISTRICT COURT JUDGE
Submitted by:
BAILEY <b>*</b> KENNEDY
By /s/ Joseph A. Liebman
Dennis Kennedy, Esq. Joseph Liebman, Esq.
8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302
Attorneys for Defendants PETE ELIADES,
THE ELIÂDES ŠURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO
HILLS, LLC

Page 4 of 4

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Steven D. Grierson
CLERK OF THE COURT

1 JUDG (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC, and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada 14 Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company, 15 Plaintiffs. **JUDGMENT** VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited 21 liability company, 22 Plaintiff, **CONSOLIDATED WITH:** VS. 23 Case No. A-16-746239-C TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants.

Page 1 of 2

1 Judgment is entered in favor of Peter Eliades and Teld, LLC and against Nanyah Vegas, LLC 2 in the amount of two hundred and sixteen thousand, two hundred and thirty-six and 25/100 dollars 3 (\$216,236.25). Interest shall continue to accrue from entry of Judgment until paid in full. 4 Judgment is also entered in favor of Peter Eliades, The Eliades Survivor Trust of 10/30/08, 5 Teld, LLC, and Eldorado Hills, LLC and against Nanyah Vegas, LLC in the amount of thirty-one thousand, ten and 98/100 dollars (\$31,010.98). Interest shall continue to accrue from entry of 6 7 Judgment until paid in full. 8 DATED this 4th day of \_ May 2020. 9 10 11 12 Submitted by: 13 BAILEY **KENNEDY** 14 15 By /s/ Joseph A. Liebman 16 Dennis L. Kennedy, Esq. Joseph A. Liebman, Esq. 17 8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302 18 Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08. 19 TELD, LLC, and ELDORADO HILLS, LLC 20 21 22 23 24 25 26 27 28

5/5/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT 1 **ORDR** Brenoch Wirthlin, Esq. (NV Bar No. 10282) **HUTCHISON & STEFFEN** 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Telephone: (702) 385-2500 Facsimile: (702) 385-2086 Email: bwirthlin@hutchlegal.com 5 Attorneys for Sigmund Rogich, Individually and 6 as Trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC 8 IN THE EIGHTH JUDICIAL DISTRICT OF 9 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 10 CARLOS A. HUERTA, an individual; CARLOS Case No.: A-13-686303-C A. HUERTA as Trustee of THE ALEXANDER 11 CHRISTOPHER TRUST, a Trust established in Dept. No.: XXVII Nevada as assignee of interests of GO GLOBAL, 12 INC., a Nevada corporation; NANYAH VEGAS, LLC A Nevada limited liability company, **Consolidated With:** 13 Plaintiffs. Case No.: A-16-746239-C 14 15 **ORDER: (1) GRANTING ROGICH** SIG ROGICH aka SIGMUND ROGICH as 16 Trustee of The Rogich Family Irrevocable Trust; **DEFENDANTS' RENEWED MOTION** ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE FOR ATTORNEYS' FEES AND 17 COSTS; AND (2) DENYING CORPORATIONS I-X, inclusive. 18 NANYAH'S MOTION TO RETAX **COSTS SUBMITTED BY ROGICH** Defendants. 19 **DEFENDANTS** 20 NANYAH VEGAS, LLC, a Nevada limited Date of Hearing: January 30, 2020 liability company, 21 Time of Hearing: 11:00 a.m. Plaintiff. 22 TELD, LLC, a Nevada limited liability company, 23 PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08: 24 SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; 25 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 26 CORPORATIONS I-X, inclusive,

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Defendants.

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**Electronically Filed** 

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## ORDER: (1) GRANTING ROGICH DEFENDANTS' RENEWED MOTION FOR ATTORNEYS' FEES AND COSTS; AND (2) DENYING NANYAH'S MOTION TO RETAX COSTS SUBMITTED BY ROGICH DEFENDANTS

Defendants SIGMUND ROGICH, as Trustee of The Rogich Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to herein as the "Rogich Defendants"), filed their Renewed Motion for Attorneys' Fees and Costs ("Attorneys' Fees Motion") on October 22, 2019; Plaintiff NANYAH VEGAS, LLC ("Nanyah") filed its Opposition to such Attorneys' Fees Motion on January 8, 2020; the Rogich Defendants filed their Reply brief on January 23, 2020.

Nanyah filed its Motion to Retax Costs submitted by the Rogich Defendants' Memorandum of Costs and Disbursements ("Motion to Retax Costs") on October 16, 2019; the Rogich Defendants filed their Opposition to such Motion to Retax on January 9, 2020; and Nanyah filed its Reply brief on January 23, 2020.

Both of the aforementioned Motions having come for hearing on **January 30, 2020** at **11:00 a.m.**, with all parties being represented by their undersigned counsel of record; Mark Simons, Esq., having appeared at the hearing on behalf of Nanyah, and Brenoch Wirthlin, Esq., having appeared at the hearing on behalf of the Rogich Defendants; the Court having requested a supplemental declaration from counsel for the Rogich Defendants regarding the redactions and block billings provided for within its Motion ("Supplemental Declaration"); the Rogich Defendants having filed their Supplemental Declaration on February 28, 2020; Nanyah having filed its response ("Nanyah's Response") to the Supplemental Declaration on March 19, 2020; the Court having reviewed and considered all papers on file in this matter, including without limitation the Supplemental Declaration and Nanyah's Response thereto, as well as having heard and considered arguments made by counsel at the time of the hearing on this matter, good cause appearing, hereby issues the following findings of fact, conclusions of law<sup>1</sup>, and Order:

<sup>&</sup>lt;sup>1</sup> If any findings of fact are more appropriately deemed conclusions of law or *vice versa*, they are so deemed.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 1. The Court finds that while it is not appropriate to award attorneys' fees to the Rogich Defendants under NRS 18, it is appropriate for this Court to award the Rogich Defendants their reasonable attorneys' fees and costs pursuant to NRCP 68;
- 2. The Court finds that the Offer of Judgment served on Nanyah on October 29, 2018 (the "Offer") pursuant to NRCP 68 was made in good faith, both in in timing and amount, and, as such, the fees incurred thereafter by the Rogich Defendants, in the principal amount of \$541,021.50, were appropriate, reasonable and justified, and are hereby awarded;
- 3. The Court finds that the it was grossly unreasonable not in bad faith but grossly unreasonable for Nanyah not to accept the Offer;
- 4. That in awarding fees, the Court considers: (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived. Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 349 50 (1969).
- 5. That after review, the Declarations submitted by the Rogich Defendants' counsel justify the award of fees as requested, and finds that the Rogich Defendants have fully satisfied each of the <u>Brunzell</u> factors as set forth therein. <u>Id.</u>;
- 6. Specifically, the Court finds that the Rogich Defendants' counsel are qualified advocates, that the work performed and hours spent were reasonable, justified and not duplicative, and that the result obtained, including dismissal of the Rogich Trust and summary judgment in favor of Rogich and Imitations, was successful;
- 7. The Court further finds that although there was some block billing, there was sufficient detail that the Court could determine that the time was reasonably spent;
- 8. The Court further finds that the hourly rate was very low compared to the skill of the attorney;

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advanced in good faith;

awarded to the Rogich Defendants; and

longer and had the laboring oar of defense.

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The Court further finds that although there were some redactions on the attorneys'

The Court further reiterates its finding that all of the costs included in the Rogich

The Court further finds that with respect to the Westlaw expenses, they are

fee invoices, the Court finds there was no churning or duplicative work and the work was

Defendants' Amended Memorandum of Costs in the amount of \$39,748.55 are justified,

including copying charges, filing fees, messenger fees, postage, Secretary of State copy of

records, service of process and Westlaw expenses, all of which costs have previously been

significantly less than the other Defendants when the Rogich Defendants were in the case much

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1	Nanyah Vegas, LLC v. Teld, LLC et al. Case No.: A-13-686303-C
2	Consolidated With:  Case No.: A-16-746239-C
3	Case No.: A-10-740239-C
4	of award until fully satisfied, for all of which let execution and garnishment issue forthwith.
5	DATED: <u>May 5, 2020</u> .
6	
7	Mancy L Allt' DISTRICT COURT JUDGE
8	Submitted by:  DISTRICT COURT JUDGE
9	HUTCHISON & STEFFEN
10	
11	By: /s/Brenoch Wirthlin
12	Brenoch Wirthlin, Esq. (NV Bar No. 10282) 10080 W. Alta Dr., Suite 200
13	Las Vegas, Nevada 89145
14	Email: <a href="mailto:bwirthlin@hutchlegal.com">bwirthlin@hutchlegal.com</a> Attorneys for the Rogich Defendants
15	APPROVED AS TO FORM
16	By: Did Not Sign
17	Mark Simons, Esq.
18	SIMONS HALL JOHNSTON 6490 S. McCarran Blvd., Ste F-46
19	Reno, NV 89509 Attorneys for Nanyah Vegas, LLC
20	
21	By: Did Not Sign Joseph Liebman, Esq.
22	BAILEY KENNEDY 8984 Spanish Ridge Avenue
23	Las Vegas, NV 89148 Attorneys for Pete Eliades, The Eliades
24	Survivor Trust, TELD, LLC, and
Eldorado Hills, LLC	Eldorado Hills, LLC
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**Electronically Filed** 5/5/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT

JUDG (CIV) 1 Brenoch Wirthlin, Esq. (NV Bar No. 10282) **HUTCHISON & STEFFEN** 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Telephone: (702) 385-2500 Facsimile: (702) 385-2086 Email: bwirthlin@hutchlegal.com Attorneys for Sigmund Rogich, Individually and 5 as Trustee of the Rogich Family Irrevocable Trust, 6 and Imitations. LLC 7 IN THE EIGHTH JUDICIAL DISTRICT OF 8 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 9 CARLOS A. HUERTA, an individual; CARLOS 10 A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in 11 Nevada as assignee of interests of GO GLOBAL, INC., a Nevada corporation; NANYAH VEGAS, 12 LLC A Nevada limited liability company, 13 Plaintiffs, 14 15 SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; 16 ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 17 CORPORATIONS I-X. inclusive. 18 Defendants. 19 NANYAH VEGAS, LLC, a Nevada limited liability company, 20 Plaintiff, 21 TELD, LLC, a Nevada limited liability company, 22 PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08; 23 SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; 24 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 25 CORPORATIONS I-X, inclusive, 26 Defendants. 27

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Case No.: A-13-686303-C

Dept. No.: XXVII

Consolidated With:

Case No.: A-16-746239-C

JUDGMENT REGARDING AWARD **OF ATTORNEYS' FEES AND COSTS IN FAVOR OF** THE ROGICH DEFENDANTS

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Case Number: A-13-686303-C

1	Nanyah Vegas, LLC v. Teld, LLC et al.
2	Case No.: A-13-686303-C Consolidated With:
3	Case No.: A-16-746239-C
4	JUDGMENT REGARDING AWARD OF ATTORNEYS' FEES AND COSTS IN FAVOR OF THE ROGICH DEFENDANTS
5	
6	Judgment is hereby entered in favor of SIGMUND ROGICH, as Trustee of The Rogich
7	Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and
8	Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to
9	herein as the "Rogich Defendants") and against Nanyah Vegas, LLC, in the amount of
10	\$541,021.50 for reasonable attorneys' fees, and additionally in the amount of \$39,748.55 for
11	reasonable costs, for a judgment against Nanyah Vegas, LLC in the total principal amount of
12	\$580,770.05. Said amount shall bear post judgment interest at the Nevada statutory interest rate
13	per annum from the date of award until fully satisfied, for all of which let execution and
14	garnishment issue forthwith.
15	DATED: <u>May 5, 2020</u> .
16	1 11/
17	DISTRICT COURT JUDGE
18	Submitted by:
19	HUTCHISON & STEFFEN
20	
21	By: /s/Brenoch Wirthlin Brenoch Wirthlin, Esq. (NV Bar No. 10282)
22	10080 W. Alta Dr., Suite 200
23	Las Vegas, Nevada 89145 Email: <a href="mailto:bwirthlin@hutchlegal.com">bwirthlin@hutchlegal.com</a>
24	Attorneys for the Rogich Defendants
25	
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**Electronically Filed** 5/6/2020 1:53 PM Steven D. Grierson CLERK OF THE COURT

1 NEOJ (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada NOTICE OF ENTRY OF ORDER 14 Corporation; NANYAH VEGAS, LLC, A GRANTING DEFENDANTS PETER ELIADES AND TELD, LLC'S Nevada limited liability company, 15 MOTION FOR ATTORNEY'S FEES Plaintiffs. VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited 21 **CONSOLIDATED WITH:** liability company, 22 Plaintiff, Case No. A-16-746239-C VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants.

Page 1 of 3

PLEASE TAKE NOTICE that an Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees was entered in the above-captioned action on May 4, 2020, a true and correct copy of which is attached hereto. DATED this 6<sup>th</sup> day of May, 2020. **BAILEY KENNEDY** By: /s/ Joseph A. Liebman DENNIS L. KENNEDY JOSEPH A. LIEBMAN Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC Page 2 of 3

## BAILEY \* KENNEDY 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.820

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#### **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of BAILEY KENNEDY and that on the 6<sup>th</sup> day of May, 3 2020, service of the foregoing NOTICE OF ENTRY OF ORDER GRANTING DEFENDANTS PETER ELIADES AND TELD, LLC'S MOTION FOR ATTORNEY'S FEES was made by 4 5 mandatory electronic service through the Eighth Judicial District Court's electronic filing system 6 and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and 7 addressed to the following at their last known address: MARK G. SIMONS, ESO. Email: msimons@shjnevada.com 8 SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Suite F-46 Attorneys for Plaintiff 9 Reno, NV 89509 NANYAH VEGAS, LLC 10 BRENOCH WIRTHLIN, ESQ. bwirthlin@hutchlegal.com 11 **HUTCHISON & STEFFEN, PLLC** 10080 West Alta Drive, Suite 200 Attorneys for Defendants 12 SIG ROGICH aka SIGMUND Las Vegas, NV 89145 ROGICH, Individually and as 13 Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST, and 14 IMITATIONS, LLC 15 MICHAEL V. CRISTALLI Email: mcristalli@gcmaslaw.com JANIECE S. MARSHALL imarshall@gcmaslaw.com 16 GENTILE CRISTALLI MILLER **ARMENI SAVARESE** Attorneys for Defendants

410 South Rampart Blvd., Suite 420

Las Vegas, NV 89145

/s/ Sharon L. Murnane
Employee of BAILEY ❖ KENNEDY

SIG ROGICH aka SIGMUND

ROGICH as Trustee of THE

ROGICH FAMILY IRREVOCABLE TRUST

**Electronically Filed** 5/4/2020 2:33 PM Steven D. Grierson CLERK OF THE COURT 1 ORDR (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada ORDER GRANTING DEFENDANTS 14 Corporation; NANYAH VEGAS, LLC, A PETER ELIADES AND TELD, LLC MOTION FOR ATTORNEY'S FEES Nevada limited liability company, 15 Plaintiffs. VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited **CONSOLIDATED WITH:** 21 liability company, Case No. A-16-746239-C 22 Plaintiff, VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive,

Case Number: A-13-686303-C

Page 1 of 4

Defendants.

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Defendants Peter Eliades ("Eliades") and Teld, LLC's ("Teld") Motion for Attorney's Fees (the "Motion for Attorney's Fees") originally came before the Court on January 30, 2020. At that time, the Court granted the Motion for Attorney's Fees, but also ordered that Eliades and Teld submit supplemental briefing in the form of an affidavit or declaration from their counsel, showing how their request for \$216,236.25 was apportioned between Eliades, Teld, The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"), and Eldorado Hills, LLC ("Eldorado Hills"), and to what extent Eliades and Teld claimed that apportionment is impracticable due to the interrelationship between the claims and parties. Eliades and Teld's supplemental declaration was filed on February 21, 2020. Nanyah Vegas, LLC ("Nanyah") filed a response to Eliades and Teld's supplemental declaration on March 20, 2020. On March 31, 2020, the Court issued a minute order providing its final ruling on the Motion for Attorney's Fees, which is set forth in detail below.

#### FINDINGS OF FACT

Section 9(d) of the Membership Interest Purchase Agreement (the "MIPA") contains the following prevailing party attorney's fees provision.

> In the event that any action or proceeding is instituted to interpret or enforce the terms and provisions of this Agreement, however, the prevailing party shall be entitled to its costs and attorney's fees, in addition to any other relief it may obtain or be entitled to.

- Eliades and Teld are both parties to the MIPA.
- Nanyah sued both Eliades and Teld for alleged breaches of the MIPA. In doing so, Nanyah alleged that it was an intended third-party beneficiary under the MIPA.
- Any finding of fact set forth herein more appropriately designated as a conclusion of law shall be so designated.

#### **CONCLUSIONS OF LAW**

- The Court finds that Nanyah was an intended third-party beneficiary under the MIPA. Thus, Nanyah is bound by Section 9(d) of the MIPA. Canfora v. Coast Hotels and Casinos, Inc. 121 Nev. 771, 779, 121 P.3d 599, 604 (2005).
- The Court also finds that Eliades and Teld are the prevailing parties against Nanyah under Section 9(d) of the MIPA, as this Court previously entered summary judgment in their favor

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and dismissed all of Nanyah's claims against them. Thus, Eliades and Teld are entitled to reimbursement of their reasonable attorney's fees from Nanyah.

- "Generally, in calculating attorney's fees, the court should consider the qualities of the advocate, the character of the work to be done, the work actually performed by the lawyer, and the result." Hornwood v. Smith's Food King No. 1, 107 Nev. 80, 87, 807 P.2d 208, 213 (1991) (citing to Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969)).
- > The Court further finds that Eliades and Teld have fulfilled the *Brunzell* factors above. Specifically, the Court finds that Eliades and Teld's counsel are qualified advocates, that the character of their work and the work performed were reasonable and justified, and that the result they obtained for Eliades and Teld—entry of summary judgment—was successful.
- > The Court also finds that Eliades and Teld's counsel's hourly rates are reasonable in this community for complex commercial litigation and allowed by courts in Nevada for professional services rendered in complex commercial litigation.
- If the Court ultimately determines that apportionment is impracticable because the claims and parties are interrelated, the Court has the discretion to decline apportionment. Mayfield v. Koroghli, 124 Nev. 343, 353-54, 184 P.3d 362, 369 (2008). However, the Court is first required to make a good faith effort to apportion attorney's fees, considering that Bailey Kennedy also represented Eldorado Hills and the Eliades Trust (two non-parties to the MIPA) in this consolidated action.
- The Court therefore requested a supplemental affidavit or declaration from Eliades and Teld's undersigned counsel relating to apportionment. Following this Court's review of the supplemental declaration as well as Nanyah's response thereto, the Court finds that Eliades and Teld apportioned attorney's fees between them and the Eliades Trust/Eldorado Hills (two non-parties to the MIPA) when practicable, such as with respect to a Motion for Summary Judgment filed solely on Eldorado Hills' behalf, which was omitted from Eliades and Teld's request for attorney's fees. For the remainder, the Court finds that it was impracticable to apportion attorney's fees because of the interrelationship between the parties and claims.

➤ Accordingly, the Court finds that Nanyah is obligated to pay \$216,236.25 to Eliades and to
Teld as reimbursement for their incurred attorney's fees.
> Any conclusion of law set forth herein more appropriately designated as a finding of fact
shall be so designated.
<u>ORDER</u>
The Court, having heard oral argument, having reviewed the papers, exhibits, and pleadings
on file, and having considered the same, and for the reasons stated upon the record, GRANTS the
Motion for Attorney's Fees and orders that Nanyah is obligated to pay \$216,236.25 to Eliades and to
Teld. The Court will issue a separate monetary judgment for that amount.
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DATED this 4th day of May, 2020.
1 1 11/
Mancy L Allf' DISTRICT COURT JUDGE
DISTRICT COURT JUDGE
Submitted by:
BAILEY <b>*</b> KENNEDY
By /s/ Joseph A. Liebman
Dennis Kennedy, Esq. Joseph Liebman, Esq.
8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302
Attorneys for Defendants PETE ELIADES,
THE ELIÂDES ŠURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO
HILLS, LLC

**Electronically Filed** 5/6/2020 1:53 PM Steven D. Grierson CLERK OF THE COURT 1 NJUD (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada NOTICE OF ENTRY OF JUDGMENT 14 Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company, 15 Plaintiffs. VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited **CONSOLIDATED WITH:** 21 liability company, Case No. A-16-746239-C 22 Plaintiff, VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants.

Page **1** of **3** 

PLEASE TAKE NOTICE that a Judgment was entered in the above-captioned action on May 4, 2020, a true and correct copy of which is attached hereto. DATED this 6<sup>th</sup> day of May, 2020. BAILEY KENNEDY By: <u>/s/ Joseph A. Liebman</u> DENNIS L. KENNEDY JOSEPH A. LIEBMAN Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC

### BAILEY \* KENNEDY 8984 Spanish Rude Avenue Las Vegas, Nevada 89148-1302 702.562.8820

#### **CERTIFICATE OF SERVICE**

I certify that I am an employee of BAILEY KENNEDY and that on the 6<sup>th</sup> day of May, 2020, service of the foregoing **NOTICE OF ENTRY OF JUDGMENT** was made by mandatory electronic service through the Eighth Judicial District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

MARK G. SIMONS, ESQ. SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Suite F-46 Reno, NV 89509	Email: msimons@shjnevada.com  Attorneys for Plaintiff NANYAH VEGAS, LLC
Brenoch Wirthlin, Esq. <b>HUTCHISON &amp; STEFFEN, PLLC</b> 10080 West Alta Drive, Suite 200 Las Vegas, NV 89145	bwirthlin@hutchlegal.com  Attorneys for Defendants SIG ROGICH aka SIGMUND ROGICH, Individually and as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST, and IMITATIONS, LLC
MICHAEL V. CRISTALLI JANIECE S. MARSHALL GENTILE CRISTALLI MILLER ARMENI SAVARESE 410 South Rampart Blvd., Suite 420 Las Vegas, NV 89145	Email: mcristalli@gcmaslaw.com jmarshall@gcmaslaw.com Attorneys for Defendants SIG ROGICH aka SIGMUND ROGICH as Trustee of THE ROGICH FAMILY IRREVOCABLE TRUST

<u>/s/ Sharon L. Murnane</u> Employee of BAILEY**❖**KENNEDY

**Electronically Filed** 5/4/2020 2:33 PM Steven D. Grierson CLERK OF THE COURT

1 JUDG (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC, and ELDORADO HILLS, LLC 9

#### DISTRICT COURT CLARK COUNTY, NEVADA

CARLOS A. HUERTA, an individual; CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada Corporation; NANYAH VEGAS, LLC, A Nevada limited liability company,

Plaintiffs.

Plaintiff,

VS.

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPOŘATIÔNŠ I-X, inclusive,

Defendants.

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8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702.562.8820

NANYAH VEGAS, LLC, a Nevada limited 21 liability company,

VS.

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TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive,

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Defendants.

Case No. A-13-686303-C Dept. No. XXVII

#### **JUDGMENT**

#### **CONSOLIDATED WITH:**

Case No. A-16-746239-C

Page 1 of 2

1	Judgment is entered in favor of Peter Eliades and Teld, LLC and against Nanyah Vegas, LLC		
2	in the amount of two hundred and sixteen thousand, two hundred and thirty-six and 25/100 dollars		
3	(\$216,236.25). Interest shall continue to accrue from entry of Judgment until paid in full.		
4	Judgment is also entered in favor of Peter Eliades, The Eliades Survivor Trust of 10/30/08,		
5	Teld, LLC, and Eldorado Hills, LLC and against Nanyah Vegas, LLC in the amount of thirty-one		
6	thousand, ten and 98/100 dollars (\$31,010.98). Interest shall continue to accrue from entry of		
7	Judgment until paid in full.		
8	DATED this 4th_day ofMay, 2020.		
10	, , , , , , , , , , , , , , , , , , ,		
11	Mancy L Allt' DISTRICT COURT JUDGE		
12			
13	Submitted by:		
14	BAILEY  KENNEDY		
15			
16	By /s/ Joseph A. Liebman  Dennis L. Kennedy, Esq. Joseph A. Liebman, Esq.		
17	8984 Spanish Ridge Avenue Las Vegas, NV 89148-1302		
18	Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF 10/30/08,		
19	TELD, LLC, and ELDORADO HILLS, LLC		
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Electronically Filed 5/7/2020 3:16 PM Steven D. Grierson CLERK OF THE COURT

NEO
Brenoch Wirthlin, Esq. (NV Bar No. 10282)
HUTCHISON & STEFFEN
10080 W. Alta Dr., Suite 200
Las Vegas, Nevada 89145
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Email: bwirthlin@hutchlegal.com
Attorneys for Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC

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#### IN THE EIGHTH JUDICIAL DISTRICT OF

#### THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK

CARLOS A. HUERTA, an individual; CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada corporation; NANYAH VEGAS, LLC A Nevada limited liability company,

Plaintiffs,

14 ∥ ,

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive,

Defendants.

NANYAH VEGAS, LLC, a Nevada limited liability company,

Plaintiff,

TELD, LLC, a Nevada limited liability company, PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust;

24 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE

Defendants.

25 CORPORATIONS I-X; and/or ROE CORPORATIONS I-X, inclusive,

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Case No.: A-13-686303-C

Dept. No.: XXVII

**Consolidated With:** 

Case No.: A-16-746239-C

#### NOTICE OF ENTRY OF ORDER

1

Case Number: A-13-686303-C

PLEASE TAKE NOTICE that an Order: (1) Granting Rogich Defendants' Renewed Motion for Attorneys' Fees and Costs; and (2) Denying Nanyah's Motion to Retax Costs Submitted by Rogich Defendants was entered on the 5<sup>th</sup> day of May, 2020, a copy of which is attached hereto.

Dated this 7<sup>th</sup> day of May, 2020.

#### **HUTCHISON & STEFFEN**

By: /s/Brenoch Wirthlin Brenoch Wirthlin, Esq. (NV Bar No. 10282)

10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145

Email: <u>bwirthlin@hutchlegal.com</u> *Attorneys for the Rogich Defendants* 

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that on this 7th day of May, 2020, I caused the document entitled **NOTICE OF ENTRY OF ORDER** to be served on the following by Electronic Service to:

#### ALL PARTIES ON THE E-SERVICE LIST

/s/Danielle Kelley
An Employee of Hutchison & Steffen, PLLC

5/5/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT 1 **ORDR** Brenoch Wirthlin, Esq. (NV Bar No. 10282) **HUTCHISON & STEFFEN** 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Telephone: (702) 385-2500 Facsimile: (702) 385-2086 Email: bwirthlin@hutchlegal.com 5 Attorneys for Sigmund Rogich, Individually and 6 as Trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC 8 IN THE EIGHTH JUDICIAL DISTRICT OF 9 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 10 CARLOS A. HUERTA, an individual; CARLOS Case No.: A-13-686303-C A. HUERTA as Trustee of THE ALEXANDER 11 CHRISTOPHER TRUST, a Trust established in Dept. No.: XXVII Nevada as assignee of interests of GO GLOBAL, 12 INC., a Nevada corporation; NANYAH VEGAS, LLC A Nevada limited liability company, **Consolidated With:** 13 Plaintiffs. Case No.: A-16-746239-C 14 15 **ORDER: (1) GRANTING ROGICH** SIG ROGICH aka SIGMUND ROGICH as 16 Trustee of The Rogich Family Irrevocable Trust; **DEFENDANTS' RENEWED MOTION** ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE FOR ATTORNEYS' FEES AND 17 COSTS; AND (2) DENYING CORPORATIONS I-X, inclusive. 18 NANYAH'S MOTION TO RETAX **COSTS SUBMITTED BY ROGICH** Defendants. 19 **DEFENDANTS** 20 NANYAH VEGAS, LLC, a Nevada limited Date of Hearing: January 30, 2020 liability company, 21 Time of Hearing: 11:00 a.m. Plaintiff. 22 TELD, LLC, a Nevada limited liability company, 23 PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08: 24 SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; 25 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE

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CORPORATIONS I-X, inclusive,

Defendants.

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## ORDER: (1) GRANTING ROGICH DEFENDANTS' RENEWED MOTION FOR ATTORNEYS' FEES AND COSTS; AND (2) DENYING NANYAH'S MOTION TO RETAX COSTS SUBMITTED BY ROGICH DEFENDANTS

Defendants SIGMUND ROGICH, as Trustee of The Rogich Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to herein as the "Rogich Defendants"), filed their Renewed Motion for Attorneys' Fees and Costs ("Attorneys' Fees Motion") on October 22, 2019; Plaintiff NANYAH VEGAS, LLC ("Nanyah") filed its Opposition to such Attorneys' Fees Motion on January 8, 2020; the Rogich Defendants filed their Reply brief on January 23, 2020.

Nanyah filed its Motion to Retax Costs submitted by the Rogich Defendants' Memorandum of Costs and Disbursements ("Motion to Retax Costs") on October 16, 2019; the Rogich Defendants filed their Opposition to such Motion to Retax on January 9, 2020; and Nanyah filed its Reply brief on January 23, 2020.

Both of the aforementioned Motions having come for hearing on **January 30, 2020** at **11:00 a.m.**, with all parties being represented by their undersigned counsel of record; Mark Simons, Esq., having appeared at the hearing on behalf of Nanyah, and Brenoch Wirthlin, Esq., having appeared at the hearing on behalf of the Rogich Defendants; the Court having requested a supplemental declaration from counsel for the Rogich Defendants regarding the redactions and block billings provided for within its Motion ("Supplemental Declaration"); the Rogich Defendants having filed their Supplemental Declaration on February 28, 2020; Nanyah having filed its response ("Nanyah's Response") to the Supplemental Declaration on March 19, 2020; the Court having reviewed and considered all papers on file in this matter, including without limitation the Supplemental Declaration and Nanyah's Response thereto, as well as having heard and considered arguments made by counsel at the time of the hearing on this matter, good cause appearing, hereby issues the following findings of fact, conclusions of law<sup>1</sup>, and Order:

<sup>&</sup>lt;sup>1</sup> If any findings of fact are more appropriately deemed conclusions of law or *vice versa*, they are so deemed.

#### FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 1. The Court finds that while it is not appropriate to award attorneys' fees to the Rogich Defendants under NRS 18, it is appropriate for this Court to award the Rogich Defendants their reasonable attorneys' fees and costs pursuant to NRCP 68;
- 2. The Court finds that the Offer of Judgment served on Nanyah on October 29, 2018 (the "Offer") pursuant to NRCP 68 was made in good faith, both in in timing and amount, and, as such, the fees incurred thereafter by the Rogich Defendants, in the principal amount of \$541,021.50, were appropriate, reasonable and justified, and are hereby awarded;
- 3. The Court finds that the it was grossly unreasonable not in bad faith but grossly unreasonable for Nanyah not to accept the Offer;
- 4. That in awarding fees, the Court considers: (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived. Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 349 50 (1969).
- 5. That after review, the Declarations submitted by the Rogich Defendants' counsel justify the award of fees as requested, and finds that the Rogich Defendants have fully satisfied each of the <u>Brunzell</u> factors as set forth therein. <u>Id.</u>;
- 6. Specifically, the Court finds that the Rogich Defendants' counsel are qualified advocates, that the work performed and hours spent were reasonable, justified and not duplicative, and that the result obtained, including dismissal of the Rogich Trust and summary judgment in favor of Rogich and Imitations, was successful;
- 7. The Court further finds that although there was some block billing, there was sufficient detail that the Court could determine that the time was reasonably spent;
- 8. The Court further finds that the hourly rate was very low compared to the skill of the attorney;

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advanced in good faith;

awarded to the Rogich Defendants; and

longer and had the laboring oar of defense.

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The Court further finds that although there were some redactions on the attorneys'

The Court further reiterates its finding that all of the costs included in the Rogich

The Court further finds that with respect to the Westlaw expenses, they are

fee invoices, the Court finds there was no churning or duplicative work and the work was

Defendants' Amended Memorandum of Costs in the amount of \$39,748.55 are justified,

including copying charges, filing fees, messenger fees, postage, Secretary of State copy of

records, service of process and Westlaw expenses, all of which costs have previously been

significantly less than the other Defendants when the Rogich Defendants were in the case much

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1	Nanyah Vegas, LLC v. Teld, LLC et al. Case No.: A-13-686303-C
2	Consolidated With:  Case No.: A-16-746239-C
3	Case No.: A-10-740239-C
4	of award until fully satisfied, for all of which let execution and garnishment issue forthwith.
5	DATED: <u>May 5, 2020</u> .
6	
7	Mancy L Allt' DISTRICT COURT JUDGE
8	Submitted by:  DISTRICT COURT JUDGE
9	HUTCHISON & STEFFEN
10	
11	By: /s/Brenoch Wirthlin
12	Brenoch Wirthlin, Esq. (NV Bar No. 10282) 10080 W. Alta Dr., Suite 200
13	Las Vegas, Nevada 89145
14	Email: <a href="mailto:bwirthlin@hutchlegal.com">bwirthlin@hutchlegal.com</a> Attorneys for the Rogich Defendants
15	APPROVED AS TO FORM
16	By: Did Not Sign
17	Mark Simons, Esq.
18	SIMONS HALL JOHNSTON 6490 S. McCarran Blvd., Ste F-46
19	Reno, NV 89509 Attorneys for Nanyah Vegas, LLC
20	
21	By: Did Not Sign Joseph Liebman, Esq.
22	BAILEY KENNEDY 8984 Spanish Ridge Avenue
23	Las Vegas, NV 89148 Attorneys for Pete Eliades, The Eliades
24	Survivor Trust, TELD, LLC, and
Eldorado Hills, LLC	Eldorado Hills, LLC
26	
27	
28	

Electronically Filed 5/7/2020 3:10 PM Steven D. Grierson CLERK OF THE COURT

NEO
Brenoch Wirthlin, Esq. (NV Bar No. 10282)
HUTCHISON & STEFFEN
10080 W. Alta Dr., Suite 200
Las Vegas, Nevada 89145
Telephone: (702) 385-2500
Facsimile: (702) 385-2086
Email: bwirthlin@hutchlegal.com
Attorneys for Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust, and Imitations. LLC

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#### IN THE EIGHTH JUDICIAL DISTRICT OF

#### THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK

CARLOS A. HUERTA, an individual; CARLOS A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada corporation; NANYAH VEGAS, LLC A Nevada limited liability company,

Plaintiffs,

∥ √

SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive.

Defendants.

NANYAH VEGAS, LLC, a Nevada limited liability company,

Plaintiff,

 $_{22} \parallel \overset{\text{v.}}{\text{T}}$ 

TELD, LLC, a Nevada limited liability company, PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust;

24 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE

25 CORPORATIONS I-X, inclusive,

Defendants.

2728

Case No.: A-13-686303-C

Dept. No.: XXVII

**Consolidated With:** 

Case No.: A-16-746239-C

#### NOTICE OF ENTRY OF ORDER

1

Case Number: A-13-686303-C

PLEASE TAKE NOTICE that a Judgment Regarding Award of Attorneys' Fees and Costs in Favor of the Rogich Defendants was entered on the 5<sup>th</sup> day of May, 2020, a copy of which is attached hereto. Dated this 7<sup>th</sup> day of May, 2020. **HUTCHISON & STEFFEN** By: /s/Brenoch Wirthlin Brenoch Wirthlin, Esq. (NV Bar No. 10282) 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Email: bwirthlin@hutchlegal.com Attorneys for the Rogich Defendants 

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that on this 7th day of May, 2020, I caused the document entitled **NOTICE OF ENTRY OF ORDER** to be served on the following by Electronic Service to:

#### ALL PARTIES ON THE E-SERVICE LIST

/s/Danielle Kelley
An Employee of Hutchison & Steffen, PLLC

**Electronically Filed** 5/5/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT

JUDG (CIV) 1 Brenoch Wirthlin, Esq. (NV Bar No. 10282) **HUTCHISON & STEFFEN** 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Telephone: (702) 385-2500 Facsimile: (702) 385-2086 Email: bwirthlin@hutchlegal.com Attorneys for Sigmund Rogich, Individually and 5 as Trustee of the Rogich Family Irrevocable Trust, 6 and Imitations. LLC 7 IN THE EIGHTH JUDICIAL DISTRICT OF 8 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 9 CARLOS A. HUERTA, an individual; CARLOS 10 A. HUERTA as Trustee of THE ALEXANDER CHRISTOPHER TRUST, a Trust established in 11 Nevada as assignee of interests of GO GLOBAL, INC., a Nevada corporation; NANYAH VEGAS, 12 LLC A Nevada limited liability company, 13 Plaintiffs, 14 15 SIG ROGICH aka SIGMUND ROGICH as Trustee of The Rogich Family Irrevocable Trust; 16 ELDORADO HILLS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 17 CORPORATIONS I-X. inclusive. 18 Defendants. 19 NANYAH VEGAS, LLC, a Nevada limited liability company, 20 Plaintiff, 21 TELD, LLC, a Nevada limited liability company, 22 PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08; 23 SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; 24 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 25 CORPORATIONS I-X, inclusive, 26 Defendants. 27

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Case No.: A-13-686303-C

Dept. No.: XXVII

Consolidated With:

Case No.: A-16-746239-C

JUDGMENT REGARDING AWARD **OF ATTORNEYS' FEES AND COSTS IN FAVOR OF** THE ROGICH DEFENDANTS

1

Case Number: A-13-686303-C

1	Nanyah Vegas, LLC v. Teld, LLC et al.	
2	Case No.: A-13-686303-C Consolidated With:	
3	Case No.: A-16-746239-C	
4	JUDGMENT REGARDING AWARD OF ATTORNEYS' FEES AND COSTS IN FAVOR OF THE ROGICH DEFENDANTS	
5	THE OF THE ROSION PER INC.	
6	Judgment is hereby entered in favor of SIGMUND ROGICH, as Trustee of The Rogich	
7	Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and	
8	Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to	
9	herein as the "Rogich Defendants") and against Nanyah Vegas, LLC, in the amount of	
10	\$541,021.50 for reasonable attorneys' fees, and additionally in the amount of \$39,748.55 for	
11	reasonable costs, for a judgment against Nanyah Vegas, LLC in the total principal amount of	
12	\$580,770.05. Said amount shall bear post judgment interest at the Nevada statutory interest rate	
13	per annum from the date of award until fully satisfied, for all of which let execution and	
14	garnishment issue forthwith.	
15	DATED:	
16		
17	Mancy L Allf' DISTRICT COURT JUDGE	
18	Submitted by:  DISTRICT COURT JUDGE	
19	HUTCHISON & STEFFEN	
20		
21	By: /s/Brenoch Wirthlin	
22	Brenoch Wirthlin, Esq. (NV Bar No. 10282) 10080 W. Alta Dr., Suite 200 Las Vegas, Nevada 89145 Email: bwirthlin@hutchlegal.com	
23		
24	Attorneys for the Rogich Defendants	
25		

**Electronically Filed** 5/21/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT

#### **CLARK COUNTY, NEVADA**

CASE NO.: A-13-686303-C DEPT. NO.: XXVII

**CONSOLIDATED WITH:** CASE NO.: A-16-746239-C

**NOTICE OF APPEAL** 

Page 1 of 4

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NOTICE IS HEREBY GIVEN, that Nanyah Vegas, LLC, by and through its attorney Mark G. Simons of SIMONS HALL JOHNSTON PC, hereby appeals to the Nevada Supreme Court for the following:

- 5/4/2020 Order Granting Defendants Peter Eliades and Teld, LLC's Motion for Attorney's Fees (Exhibit 1);
  - 2. 5/4/2020 Judgment (Exhibit 2);1
- 3. 5/5/2020 Order: (1) Granting Rogich Defendants' Renewed Motion for Attorneys' Fees and Costs; and (2) Denying Nanyah's Motion to Retax Costs Submitted by Rogich Defendants (Exhibit 3); and
- 5/5/2020 Judgment Regarding Award of Attorneys' Fees and Costs in Favor of the Rogich Defendants (Exhibit 4).

**AFFIRMATION:** This document does not contain the social security number of any person.

day of May, 2020.

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., #F-46 Reno, Nevada, 89509

MARK & SIMONS

Attornéy for Nanyah Vegas, LLC

<sup>&</sup>lt;sup>1</sup> The Judgment includes an award of costs. A separate order awarding costs was not entered by the Court.

# SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509

Phone: (775) 785-0088

#### **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and EDCR 8.05, I certify that I am an employee of SIMONS HALL JOHNSTON PC and that on this date I caused to be served a true copy of the NOTICE OF APPEAL on all parties to this action in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the abovereferenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

DATED this 21 day of May, 2020.

Employee of Simons Hall Johnston PC

SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 Reno, NV 89509 Phone: (775) 785-0088

#### **EXHIBIT LIST**

NO.	DESCRIPTION	PAGES
1	Order re Eliades, et al.	4
2	Judgment re Eliades, et al.	2
3	Order re Rogich	6
4	Judgment re Rogich	2

## **EXHIBIT 1**

## **EXHIBIT 1**

**Electronically Filed** 5/4/2020 2:33 PM Steven D. Grierson CLERK OF THE COUR 1 ORDR (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY & KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C BAILEY \* KENNEDY 8984 SPANISH RIDGE AVENUE LAS VEGAS, NEVADA 89148-1302 702,562,8820 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada ORDER GRANTING DEFENDANTS 14 Corporation; NANYAH VEGAS, LLC, A PETER ELIADES AND TELD, LLC'S Nevada limited liability company, MOTION FOR ATTORNEY'S FEES 15 Plaintiffs. VS. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited CONSOLIDATED WITH: 21 liability company, Case No. A-16-746239-C 22 Plaintiff. VS. 23 TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants. Page 1 of 4

Case Number: A-13-686303-C

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Defendants Peter Eliades ("Eliades") and Teld, LLC's ("Teld") Motion for Attorney's Fees (the "Motion for Attorney's Fees") originally came before the Court on January 30, 2020. At that time, the Court granted the Motion for Attorney's Fees, but also ordered that Eliades and Teld submit supplemental briefing in the form of an affidavit or declaration from their counsel, showing how their request for \$216,236.25 was apportioned between Eliades, Teld, The Eliades Survivor Trust of 10/30/08 (the "Eliades Trust"), and Eldorado Hills, LLC ("Eldorado Hills"), and to what extent Eliades and Teld claimed that apportionment is impracticable due to the interrelationship between the claims and parties. Eliades and Teld's supplemental declaration was filed on February 21, 2020. Nanyah Vegas, LLC ("Nanyah") filed a response to Eliades and Teld's supplemental declaration on March 20, 2020. On March 31, 2020, the Court issued a minute order providing its final ruling on the Motion for Attorney's Fees, which is set forth in detail below.

#### FINDINGS OF FACT

Section 9(d) of the Membership Interest Purchase Agreement (the "MIPA") contains the following prevailing party attorney's fees provision.

> In the event that any action or proceeding is instituted to interpret or enforce the terms and provisions of this Agreement, however, the prevailing party shall be entitled to its costs and attorney's fees, in addition to any other relief it may obtain or be entitled to.

- Eliades and Teld are both parties to the MIPA.
- Nanyah sued both Eliades and Teld for alleged breaches of the MIPA. In doing so, Nanyah alleged that it was an intended third-party beneficiary under the MIPA.
- Any finding of fact set forth herein more appropriately designated as a conclusion of law shall be so designated.

#### CONCLUSIONS OF LAW

- The Court finds that Nanyah was an intended third-party beneficiary under the MIPA. Thus, Nanyah is bound by Section 9(d) of the MIPA. Canfora v. Coast Hotels and Casinos, Inc. 121 Nev. 771, 779, 121 P.3d 599, 604 (2005).
- The Court also finds that Eliades and Teld are the prevailing parties against Nanyah under Section 9(d) of the MIPA, as this Court previously entered summary judgment in their favor

Page 2 of 4

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and dismissed all of Nanyah's claims against them. Thus, Eliades and Teld are entitled to reimbursement of their reasonable attorney's fees from Nanyah.

- "Generally, in calculating attorney's fees, the court should consider the qualities of the advocate, the character of the work to be done, the work actually performed by the lawyer, and the result." Hornwood v. Smith's Food King No. 1, 107 Nev. 80, 87, 807 P.2d 208, 213 (1991) (citing to Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969)).
- The Court further finds that Eliades and Teld have fulfilled the Brunzell factors above. Specifically, the Court finds that Eliades and Teld's counsel are qualified advocates, that the character of their work and the work performed were reasonable and justified, and that the result they obtained for Eliades and Teld—entry of summary judgment—was successful.
- The Court also finds that Eliades and Teld's counsel's hourly rates are reasonable in this community for complex commercial litigation and allowed by courts in Nevada for professional services rendered in complex commercial litigation.
- If the Court ultimately determines that apportionment is impracticable because the claims and parties are interrelated, the Court has the discretion to decline apportionment. Mayfield v. Koroghli, 124 Nev. 343, 353-54, 184 P.3d 362, 369 (2008). However, the Court is first required to make a good faith effort to apportion attorney's fees, considering that Bailey❖Kennedy also represented Eldorado Hills and the Eliades Trust (two non-parties to the MIPA) in this consolidated action.
- The Court therefore requested a supplemental affidavit or declaration from Eliades and Teld's undersigned counsel relating to apportionment. Following this Court's review of the supplemental declaration as well as Nanyah's response thereto, the Court finds that Eliades and Teld apportioned attorney's fees between them and the Eliades Trust/Eldorado Hills (two non-parties to the MIPA) when practicable, such as with respect to a Motion for Summary Judgment filed solely on Eldorado Hills' behalf, which was omitted from Eliades and Teld's request for attorney's fees. For the remainder, the Court finds that it was impracticable to apportion attorney's fees because of the interrelationship between the parties and claims.

1	Accordingly, the Court finds that Nanyah is obligated to pay \$216,236.25 to Eliades and to		
2	Teld as reimbursement for their incurred attorney's fees.		
3	> Any conclusion of law set forth herein more appropriately designated as a finding of fact		
4	shall be so designated.		
5	<u>ORDER</u>		
6	The Court, having heard oral argument, having reviewed the papers, exhibits, and pleadings		
7	on file, and having considered the same, and for the reasons stated upon the record, GRANTS the		
8	Motion for Attorney's Fees and orders that Nanyah is obligated to pay \$216,236.25 to Eliades and to		
9	Teld. The Court will issue a separate monetary judgment for that amount.		
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11	DATED this 4th day of May, 2020.		
12	1. 1. 1. 1110		
13	Mancy L Allt' DISTRICT COURT JUDGE		
14	DISTRICT SOURT TO DEL		
15	Submitted by:		
16	BAILEY <b>*</b> KENNEDY		
17	By_/s/ Joseph A. Liebman		
18	Dennis Kennedy, Esq. Joseph Liebman, Esq.		
19	8984 Spanish Rídge Avenue Las Vegas, NV 89148-1302		
20	Attorneys for Defendants PETE ELIADES, THE ELIADES SURVIVOR TRUST OF		
21	10/30/08, TELD, LLC and ELDORADO		
22	HILLS, LLC		
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	Page 4 of 4		

## **EXHIBIT 2**

## **EXHIBIT 2**

**Electronically Filed** 5/4/2020 2:33 PM Steven D. Grierson CLERK OF THE COURT 1 JUDG (CIV) DENNIS L. KENNEDY 2 Nevada Bar No. 1462 JOSEPH A. LIEBMAN 3 Nevada Bar No. 10125 **BAILEY & KENNEDY** 4 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302 5 Telephone: 702.562.8820 Facsimile: 702.562.8821 6 DKennedy@BaileyKennedy.com JLiebman@BaileyKennedy.com 7 Attorneys for Defendants PETE ELIADES, THE 8 ELIADES SURVIVOR TRUST OF 10/30/08, TELD, LLC, and ELDORADO HILLS, LLC 9 10 DISTRICT COURT CLARK COUNTY, NEVADA 11 CARLOS A. HUERTA, an individual; Case No. A-13-686303-C 12 CARLOS A. HUERTA as Trustee of THE Dept. No. XXVII ALEXANDER CHRISTOPHER TRUST, a 13 Trust established in Nevada as assignee of interests of GO GLOBAL, INC., a Nevada Corporation; NANYAH VEGAS, LLC, A 14 Nevada limited liability company, 15 Plaintiffs, **JUDGMENT** vs. 16 SIG ROGICH aka SIGMUND ROGICH as 17 Trustee of The Rogich Family Irrevocable Trust; ELDORADO HILLS, LLC, a Nevada 18 limited liability company; DOES I-X; and/or ROE CORPORATIONS I-X, inclusive, 19 Defendants. 20 NANYAH VEGAS, LLC, a Nevada limited 21 liability company, 22 **CONSOLIDATED WITH:** Plaintiff, VS. 23 Case No. A-16-746239-C TELD, LLC, a Nevada limited liability 24 company; PETER ELIADES, individually and as Trustee of The Eliades Survivor Trust of 25 10/30/08; SIGMUND ROGICH, individually and as Trustee of The Rogich Family 26 Irrevocable Trust; IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; 27 and/or ROE CORPORATIONS I-X, inclusive, 28 Defendants. Page 1 of 2

Page 2 of 2

### **EXHIBIT 3**

## **EXHIBIT 3**

5/5/2020 3:59 PM Steven D. Grierson CLERK OF THE COURT **ORDR** 1 Brenoch Wirthlin, Esq. (NV Bar No. 10282) 2 **HUTCHISON & STEFFEN** 10080 W. Alta Dr., Suite 200 3 Las Vegas, Nevada 89145 Telephone: (702) 385-2500 4 Facsimile: (702) 385-2086 5 Email: bwirthlin@hutchlegal.com Attorneys for Sigmund Rogich, Individually and as Trustee of the Rogich Family Irrevocable Trust, and Imitations, LLC 7 8 IN THE EIGHTH JUDICIAL DISTRICT OF 9 THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK 10 CARLOS A. HUERTA, an individual; CARLOS Case No.: A-13-686303-C A. HUERTA as Trustee of THE ALEXANDER 11 CHRISTOPHER TRUST, a Trust established in Dept. No.: XXVII Nevada as assignee of interests of GO GLOBAL, 12 INC., a Nevada corporation; NANYAH VEGAS, LLC A Nevada limited liability company, Consolidated With: 13 Plaintiffs. Case No.: A-16-746239-C 14 15 SIG ROGICH aka SIGMUND ROGICH as **ORDER: (1) GRANTING ROGICH** 16 Trustee of The Rogich Family Irrevocable Trust; **DEFENDANTS' RENEWED MOTION** ELDORADO HILLS, LLC, a Nevada limited FOR ATTORNEYS' FEES AND 17 liability company; DOES I-X; and/or ROE COSTS; AND (2) DENYING CORPORATIONS I-X, inclusive, 18 NANYAH'S MOTION TO RETAX COSTS SUBMITTED BY ROGICH Defendants. 19 **DEFENDANTS** 20 NANYAH VEGAS, LLC, a Nevada limited Date of Hearing: January 30, 2020 liability company, 21 Time of Hearing: 11:00 a.m. Plaintiff, 22 TELD, LLC, a Nevada limited liability company, 23 PETER ELIADES, individually and as Trustee of the Eliades Survivor Trust of 10/30/08; 24 SIGMUND ROGICH, individually and as Trustee of The Rogich Family Irrevocable Trust; 25 IMITATIONS, LLC, a Nevada limited liability company; DOES I-X; and/or ROE 26 CORPORATIONS I-X, inclusive, 27 Defendants.

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### ORDER: (1) GRANTING ROGICH DEFENDANTS' RENEWED MOTION FOR ATTORNEYS' FEES AND COSTS; AND (2) DENYING NANYAH'S MOTION TO RETAX COSTS SUBMITTED BY ROGICH DEFENDANTS

Defendants SIGMUND ROGICH, as Trustee of The Rogich Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to herein as the "Rogich Defendants"), filed their Renewed Motion for Attorneys' Fees and Costs ("Attorneys' Fees Motion") on October 22, 2019; Plaintiff NANYAH VEGAS, LLC ("Nanyah") filed its Opposition to such Attorneys' Fees Motion on January 8, 2020; the Rogich Defendants filed their Reply brief on January 23, 2020.

Nanyah filed its Motion to Retax Costs submitted by the Rogich Defendants' Memorandum of Costs and Disbursements ("Motion to Retax Costs") on October 16, 2019; the Rogich Defendants filed their Opposition to such Motion to Retax on January 9, 2020; and Nanyah filed its Reply brief on January 23, 2020.

Both of the aforementioned Motions having come for hearing on January 30, 2020 at 11:00 a.m., with all parties being represented by their undersigned counsel of record; Mark Simons, Esq., having appeared at the hearing on behalf of Nanyah, and Brenoch Wirthlin, Esq., having appeared at the hearing on behalf of the Rogich Defendants; the Court having requested a supplemental declaration from counsel for the Rogich Defendants regarding the redactions and block billings provided for within its Motion ("Supplemental Declaration"); the Rogich Defendants having filed their Supplemental Declaration on February 28, 2020; Nanyah having filed its response ("Nanyah's Response") to the Supplemental Declaration on March 19, 2020; the Court having reviewed and considered all papers on file in this matter, including without limitation the Supplemental Declaration and Nanyah's Response thereto, as well as having heard and considered arguments made by counsel at the time of the hearing on this matter, good cause appearing, hereby issues the following findings of fact, conclusions of law<sup>1</sup>, and Order:

<sup>&</sup>lt;sup>1</sup> If any findings of fact are more appropriately deemed conclusions of law or vice versa, they are so deemed.

#### FINDINGS OF FACT AND CONCLUSIONS OF LAW

- 1. The Court finds that while it is not appropriate to award attorneys' fees to the Rogich Defendants under NRS 18, it is appropriate for this Court to award the Rogich Defendants their reasonable attorneys' fees and costs pursuant to NRCP 68;
- 2. The Court finds that the Offer of Judgment served on Nanyah on October 29, 2018 (the "Offer") pursuant to NRCP 68 was made in good faith, both in in timing and amount, and, as such, the fees incurred thereafter by the Rogich Defendants, in the principal amount of \$541,021.50, were appropriate, reasonable and justified, and are hereby awarded;
- 3. The Court finds that the it was grossly unreasonable not in bad faith but grossly unreasonable for Nanyah not to accept the Offer;
- 4. That in awarding fees, the Court considers: (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived. Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 349 50 (1969).
- 5. That after review, the Declarations submitted by the Rogich Defendants' counsel justify the award of fees as requested, and finds that the Rogich Defendants have fully satisfied each of the <u>Brunzell</u> factors as set forth therein. <u>Id</u>.;
- 6. Specifically, the Court finds that the Rogich Defendants' counsel are qualified advocates, that the work performed and hours spent were reasonable, justified and not duplicative, and that the result obtained, including dismissal of the Rogich Trust and summary judgment in favor of Rogich and Imitations, was successful;
- 7. The Court further finds that although there was some block billing, there was sufficient detail that the Court could determine that the time was reasonably spent;
- 8. The Court further finds that the hourly rate was very low compared to the skill of the attorney;

- 10. The Court further reiterates its finding that all of the costs included in the Rogich Defendants' Amended Memorandum of Costs in the amount of \$39,748.55 are justified, including copying charges, filing fees, messenger fees, postage, Secretary of State copy of records, service of process and Westlaw expenses, all of which costs have previously been awarded to the Rogich Defendants; and
- 11. The Court further finds that with respect to the Westlaw expenses, they are significantly less than the other Defendants when the Rogich Defendants were in the case much longer and had the laboring oar of defense.

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Nanyah Vegas, LLC v. Teld, LLC et al. Case No.: A-13-686303-C Consolidated With:

Case No.: A-16-746239-C

#### **ORDER**

Based upon the foregoing Findings of Fact, and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

- 1. That Rogich Defendants' Attorneys' Fees Motion is hereby GRANTED as set forth herein;
  - 2. That Nanyah's Motion to Retax Costs was previously DENIED;
- 3. That, pursuant to NRCP 68, the Rogich Defendants are entitled and are hereby awarded their reasonable attorneys' fees as a judgment against Nanyah Vegas, LLC in the amount of \$541,021.50;
- 4. That the Rogich Defendants were previously awarded their costs as a judgment against Nanyah Vegas, LLC in the amount of \$39,748.55;
- That the awards of attorneys' fees and costs to the Rogich Defendants shall bear post judgment interest at the Nevada statutory interest rate per annum from the date

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Nanyah Vegas, LLC v. Teld, LLC et al. 1 Case No.: A-13-686303-C 2 Consolidated With: Case No.: A-16-746239-C 3 4 of award until fully satisfied, for all of which let execution and garnishment issue forthwith. 5 DATED: May 5, 2020 6 7 8 Submitted by: 9 **HUTCHISON & STEFFEN** 10 11 By: /s/Brenoch Wirthlin Brenoch Wirthlin, Esq. (NV Bar No. 10282) 12 10080 W. Alta Dr., Suite 200 13 Las Vegas, Nevada 89145 Email: <u>bwirthlin@hutchlegal.com</u> 14 Attorneys for the Rogich Defendants 15 APPROVED AS TO FORM 16 By: Did Not Sign 17 Mark Simons, Esq. SIMONS HALL JOHNSTON 18 6490 S. McCarran Blvd., Ste F-46 Reno, NV 89509 19 Attorneys for Nanyah Vegas, LLC 20 By: Did Not Sign 21 Joseph Liebman, Esq. **BAILEY KENNEDY** 22 8984 Spanish Ridge Avenue Las Vegas, NV 89148 23 Attorneys for Pete Eliades, The Eliades Survivor Trust, TELD, LLC, and 24 Eldorado Hills, LLC 25 26 27

### **EXHIBIT 4**

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Nanyah Vegas, LLC v. Teld, LLC et al. Case No.: A-13-686303-C Consolidated With:

Case No.: A-16-746239-C

### JUDGMENT REGARDING AWARD OF ATTORNEYS' FEES AND COSTS IN FAVOR OF THE ROGICH DEFENDANTS

Judgment is hereby entered in favor of SIGMUND ROGICH, as Trustee of The Rogich Family Irrevocable Trust ("The Rogich Trust"), Sigmund Rogich individually ("Rogich") and Imitations, LLC ("Imitations" and collectively with the Rogich Trust and Rogich referred to herein as the "Rogich Defendants") and against Nanyah Vegas, LLC, in the amount of \$541,021.50 for reasonable attorneys' fees, and additionally in the amount of \$39,748.55 for reasonable costs, for a judgment against Nanyah Vegas, LLC in the total principal amount of \$580,770.05. Said amount shall bear post judgment interest at the Nevada statutory interest rate per annum from the date of award until fully satisfied, for all of which let execution and garnishment issue forthwith.

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	Mancy L All district court judge
Submitted by:	<b>~</b>

May 5, 2020

### **HUTCHISON & STEFFEN**

By: /s/Brenoch Wirthlin

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Las Vegas, Nevada 89145

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Attorneys for the Rogich Defendants

DATED: