

IN THE SUPREME COURT OF THE STATE OF NEVADA

VIVIA HARRISON,

Appellant,

vs.

RAMPARTS INC., LUXOR HOTEL &
CASINO, A DOMESTIC
CORPORATION,

Respondent.

Case No. 80167

Electronically Filed
Jul 09 2020 02:22 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial
District Court, the Honorable David
M. Jones Presiding

APPELLANT'S APPENDIX, VOLUME 3

(Nos. 293–496)

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Attorneys for Appellant, Vivia Harrison

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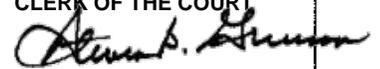
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Exhibit	Document Description	
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Exhibit	Document Description	
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1 MEMC
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7 tmaroney@lgclawoffice.com

8 Attorneys for Defendant, RAMPARTS, INC.
d/b/a LUXOR HOTEL & CASINO
9

10
11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**
13

14 VIVIA HARRISON, an individual,
15 Plaintiff,

16 v.

17 RAMPARTS, INC. d/b/a LUXOR HOTEL &
CASINO, a Nevada Domestic Corporation;
18 DESERT MEDICAL EQUIPMENT, a Nevada
Domestic Corporation, DOES I through XXX,
19 inclusive, and ROE BUSINESS ENTITIES I
through XXX, inclusive,
20 Defendants.

21
22 DESERT MEDICAL EQUIPMENT, a Nevada
Domestic Corporation,

23 Third-Party Plaintiff,

24 v.

25 STAN SAWAMOTO, an individual,

26
27 Third Party Defendant.
28

CASE NO.: A-16-732342-C
DEPT. NO.: XXIX

**DEFENDANT RAMPARTS, INC. d/b/a
LUXOR HOTEL & CASINO'S
MEMORANDUM OF COSTS AND
DISBURSEMENTS**

Filing Fees/E-File Charges

1	Filing Fee (Motion for Summary Judgment).....	\$	200.00
2	E-Filing Charges.....	\$	62.00
3	Subtotal.....	\$	262.00

Court Reporter/Litigation Charges

4	Litigation Services (Invoice 1127828 – 01/31/17).....	\$	230.00
5	All American Court Reporters (Invoice 1114933 – 04/18/17).....	\$	383.50
6	All American Court Reporters (Invoice 1114940 – 04/18/17).....	\$	353.25
7	Rocket Reporters (Invoice 200602 – 08/28/17).....	\$	480.00
8	Advanced Depositions (Invoice 28436 – 10/20/17).....	\$	1,369.40
8	Advanced Depositions (Invoice 28489 – 10/24/17).....	\$	853.90
9	Depo International (Invoice 36936 – 11/15/17).....	\$	646.80
10	Evolve Deposition, LLC (Invoice 205889 – 01/03/18).....	\$	335.84
11	Evolve Deposition, LLC (Invoice 205891 – 01/03/18).....	\$	310.95
11	Evolve Deposition, LLC (Invoice 205904 – 01/05/18).....	\$	317.89
12	Evolve Deposition, LLC (Invoice 205953 – 01/30/18).....	\$	655.88
13	Esquire Deposition Solutions, LLC (Invoice 1287284 – 08/01/18).....	\$	627.90
13	Esquire Deposition Solutions, LLC (Invoice 1288997 – 08/03/18).....	\$	524.45
14	Kennedy Court Reporters (10/03/18).....	\$	135.27
15	Kennedy Court Reporters (11/14/18).....	\$	482.60
16	Kennedy Court Reporters (Invoice 22254 – 12/17/18).....	\$	80.16
17	Subtotal.....	\$	7,787.79

Expert Charges

18	Madsen, Kneppers & Associates (Invoice 1138162 – 10/29/17).....	\$	3,093.00
19	Madsen, Kneppers & Associates (Invoice 1139441 – 11/26/17).....	\$	3,376.50
20	Madsen, Kneppers & Associates (Invoice 1142004 – 01/28/18).....	\$	478.50
21	Madsen, Kneppers & Associates (Invoice 1146740 – 05/27/18).....	\$	1,495.90
21	Madsen, Kneppers & Associates (Invoice 1147854 – 06/24/18).....	\$	4,315.50
22	Madsen, Kneppers & Associates (Invoice 1154119 – 12/30/18).....	\$	3,836.50
23	Vocational Diagnostics, Inc. (Invoice 22111 – 06/20/18).....	\$	1,298.80
23	Vocational Diagnostics, Inc. (Invoice 22181 – 06/29/18).....	\$	1,853.51
24	Vocational Diagnostics, Inc. (Invoice 23048 – 12/19/18).....	\$	4,159.54
25	Clifford Segil, D.O. (Invoice dated 12/29/18).....	\$	7,155.00
26	Subtotal.....	\$	31,062.75

Service Charges

27	Nationwide Legal Nevada, LLC (attempted service on Jessica Atchley).....	\$	55.00
28	Nationwide Legal Nevada, LLC (service on Nicolas Sanchez).....	\$	55.00

1	Nationwide Legal Nevada, LLC (attempted service on Barbara Bradley).....	\$	55.00
2	Subtotal.....	\$	165.00
	<u>Witness Fees</u>		
3	Nicolas Sanchez.....	\$	25.00
4	Melissa Myers.....	\$	25.00
5	Subtotal.....	\$	50.00
	<u>Trial Preparation Charges</u>		
6	HOLO Discovery (Invoice 6464 – 12/03/18) (Trial Exhibits).....	\$	394.03
7	HOLO Discovery (Invoice 6465 – 12/03/18) (Trial Exhibits).....	\$	3,272.27
8	HOLO Discovery (Invoice 6484 – 12/10/18) (Trial Exhibits).....	\$	1,446.47
9	Jury to Verdict Trial Services (Invoice No. 2017-2043).....	\$	525.00
10	Subtotal.....	\$	5,637.77
	<u>Hearing Recorder Charges</u>		
11	Clark County Treasurer (10/03/18).....	\$	40.00
12	Clark County Treasurer (11/14/18).....	\$	80.00
13	Subtotal.....	\$	120.00
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14			
15	Clark County Treasurer (Recording Fee & CDs – 12/24/18).....	\$	775.00
16	Subtotal.....	\$	775.00
	<u>Miscellaneous Charges</u>		
17			
18	Photocopies.....	\$	851.75
19	Parking.....	\$	112.00
20	Messenger.....	\$	15.00
21	Airfare.....	\$	4,015.14
22	Rental Cars/Fuel.....	\$	625.72
23	Lodging.....	\$	1,392.53
24	Meals.....	\$	287.58
25	Subtotal.....	\$	7,299.72
26	TOTAL COSTS INCURRED.....	\$	53,160.03
27	///		
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AFFIDAVIT IN SUPPORT OF COSTS

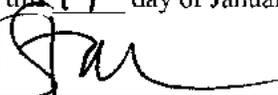
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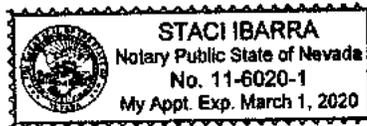
STATE OF NEVADA)
) ss
COUNTY OF CLARK)

I, THOMAS W. MARONEY, ESQ., being first duly sworn according to law, deposes and says:
I am counsel of record for Defendant in the above-entitled matter; that I have read the foregoing
Memorandum of Costs and Disbursements and know the contents thereof; that the same is true of my
own knowledge, except as to those matters stated upon information and belief, and as to those matters,
I believe them to be true.


THOMAS W. MARONEY, ESQ.

SUBSCRIBED AND SWORN to before me
this 17 day of January, 2019.


NOTARY PUBLIC in and for said County
and State

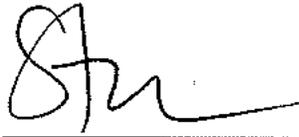


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1 Vivia Harrison v. Ramparts, Inc. dba Luxor Hotel & Casino, et al.
2 Clark County Case No. A-16-732342-C

3 **CERTIFICATE OF SERVICE**

4 I HEREBY CERTIFY that on the 17th day of January, 2019, I served a copy of the attached
5 **DEFENDANT RAMPARTS, INC. d/b/a LUXOR HOTEL & CASINO'S MEMORANDUM**
6 **OF COSTS AND DISBURSEMENTS** via electronic service to all parties on the Odyssey E-
7 Service Master List.

8
9
10 

11 _____
12 Staci D. Ibarra, an employee
13 of the law offices of
14 Lincoln, Gustafson & Cercos, LLP

14 V:\F-Harrison_Luxor_POS-20190115_MEMO_sdi.doc

Filing Fees/E-File Charges

Details of filing: Substitution of Attorneys for Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino
Filed in Case Number: A-16-732342-C

E-File ID: 8541187

Lead File Size: 94901 bytes

Date Filed: 2016-08-31 10:14:52.0

Case Title: A-16-732342-C

Case Name: Vivia Harrison, Plaintiff(s) vs. MGM Resorts International, Defendant(s)

Filing Title: Substitution of Attorneys for Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino

Filing Type: EFS

Filer's Name: Loren S. Young

Filer's Email: bprivett@gdawoffice.com

Account Name: Lincoln Gustafson & Cercos (BPrivett)

Filing Code: SUBT

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 31-AUG-2016 04:44:23 PM: Approved \$3.50 on Visa account "Lincoln Gustafson & Cercos (BPrivett)" [****-0838]

Comments:

Courtesy Copies:

Firm Name: Lincoln Gustafson & Cercos

Your File Number: Harrison v. Luxor *16304*

Status: Accepted - (A)

Date Accepted: 2016-08-31 13:44:26.0

Review Comments:

Reviewer: Josie San Juan

File Stamped Copy: A-16-732342-C-8541187 SUBT Substitution of Attorneys for Defendant Ramparts, Inc. d b a Luxor Hotel ... Casino.pdf

Cover Document:

Documents:

Lead Document: 20160831 SUBT bip.pdf 94901 bytes

Data Reference ID:

Credit Card System Response: AP0CD89F8A59

Response: Reference:

Envelope Information

Envelope Id
1075698

Submitted Date
6/13/2017 10:38 AM PST

Submitted User Name
bpederson@lgclawoffice.com

Case Information

Location
Department 29

Category
Civil

Case Type
Negligence - Premises Liability

Case Initiation Date
2/24/2016

Case #
A-16-732342-C

Assigned to Judge
Jones, David M



Filings

Filing Type
EFileAndServe

Filing Code
Response - RSPN

Filing Description
Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino's Response to Plaintiff's Opposition to Defendant Pride Mobility Products Corp.'s Motion for Summary Judgment

Client Reference Number
16304 Harrison

Filing on Behalf of
Ramparts Inc

Filing Status
Accepted

Accepted Date
6/13/2017 4:53 PM PST

Lead Document

File Name
20170613_RSPN_P Opp to Pride MSJ_klg.pdf

Security

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eService Details

Status Name
Sent Crystal Williams

Firm
Bremer, Whyte, Brown & O'Meara, LLP

Served Date Opened
Yes Not Opened

Parties with No eService

Name **Address**
Vivia Harrison

Name **Address**
Desert Medical Equipment

Name **Address**
MGM Resorts International

Name **Address**
Desert Medical Equipment

Fees

Response - RSPN

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	Ramparts Inc	Transaction Amount	\$3.50
Payment Account	Firm Card-Barb	Transaction Id	1574542
Filing Attorney	Kylee Gloeckner	Order Id	001075698-0
Transaction Response	Payment Complete		

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s)vs.MGM Resorts I**Envelope Information**

Envelope Id 2971216	Submitted Date 8/8/2018 4:10 PM PST	Submitted User Name sibarra@lgclawoffice.com
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Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Reply - RPLY (CIV)
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Filing Description
Defendant Ramparts, Inc. dba Luxor
Hotel & Casino's Limited Reply to
Plaintiff's Opposition to Defendant Pride
Mobility Products Corp.'s Renewed
Motion for Summary Judgment

Client Reference Number
Harrison v. Luxor / 16304

Filing Status Accepted	Accepted Date 8/8/2018 5:01 PM PST
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Lead Document

File Name	Description	Security	Download
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eService Details

Status Name	Firm	Served Date	Opened
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Case # A-16-732342-C - Vivia Harrison, Plaintiff(s)vs.MGM Resorts I

Envelope Information

Envelope Id
3029389



Submitted Date
8/20/2018 7:39 PM PST

Submitted User Name
sibarra@lgclawoffice.com

Case Information

Location
Department 29

Category
Civil

Case Type
Negligence - Premises Liability

Case Initiation Date
2/24/2016

Case #
A-16-732342-C

Assigned to Judge
Jones, David M

Filings

Filing Type
EFileAndServe

Filing Code
Motion for Summary Judgment - MSJD (CIV)

Filing Description
Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino's Motion for Summary Judgment

Client Reference Number
Harrison v. Luxor/ 16304

Filing on Behalf of
Ramparts Inc

Filing Status
Accepted

Accepted Date
8/22/2018 10:03 AM PST

Lead Document

File Name
20180820 MSJD_Isy_final.pdf

Description
Motion for Summary Judgment - MSJD (CIV)

Security
Public Filed Document

Download
Original File
Court Copy

eService Details

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I**Envelope Information**

Envelope Id 3119220	Submitted Date 9/7/2018 2:42 PM PST	Submitted User Name sibarra@lgdawoffice.com
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Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Opposition - OPPS (CIV)
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Filing Description
Defendant Ramparts, Inc. dba Luxor
Hotel & Casino's Limited Opposition to
Defendant Desert Medical Equipment's
Renewed Motion for Summary Judgment

Client Reference Number
Harrison v. Luxor / 16304

Filing Status Accepted	Accepted Date 9/10/2018 1:55 PM PST
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Lead Document

File Name 20180907_OPPS_DME MSJ_twm.pdf	Description Opposition - OPPS (CIV)	Security Public Filed Document	Download Original File Court Copy
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eService Details

Status Name	Firm	Served Date Opened
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Status	Name	Firm	Served	Date Opened
Sent	Rosemarie Frederick		Yes	Not Opened
Sent	Cynthia Fears	Moss Berg Injury Lawyers	Yes	9/14/2018 8:24 AM F
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Parties with No eService

Name
Desert Medical Equipment

Address

Name
MGM Resorts International

Address

Name
Desert Medical Equipment

Address

Fees

Opposition - OPPS (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Motion in Limine - MLIM (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Motion in Limine - MLIM (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total:	\$3.50

Party Responsible for Fees	Ramparts Inc	Transaction Amount	\$3.50
----------------------------	--------------	--------------------	--------

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I

Envelope Information

Envelope Id
3162286

Submitted Date
9/17/2018 4:10 PM PST

Submitted User Name
sibarra@lgclawoffice.com

Case Information

Location
Department 29

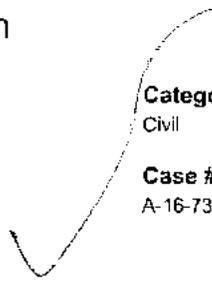
Category
Civil

Case Type
Negligence - Premises Liability

Case Initiation Date
2/24/2016

Case #
A-16-732342-C

Assigned to Judge
Jones, David M



Filings

Filing Type
EFileAndServe

Filing Code
Reply - RPLY (CIV)

Filing Description
Defendant Ramparts, Inc. dba Luxor
Hotel & Casino's Reply in Support of its
Motion for Summary Judgment

Client Reference Number
Harrison v. Luxor / 16304

Filing on Behalf of
Ramparts Inc

Filing Status
Accepted

Accepted Date
9/18/2018 7:30 AM PST

Lead Document

File Name
20180917_RPLY_MSJ_twm.pdf

Description
Reply - RPLY (CIV)

Security
Public Filed Document

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eService Details

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I

Envelope Information

Envelope Id 3162819	Submitted Date 9/17/2018 4:43 PM PST	Submitted User Name sibarra@lgclawoffice.com
-------------------------------	--	--

Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Joinder - JOIN (CIV)
-------------------------------------	--

Filing Description
Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Joinder to Defendant Desert Medical Equipment's Motion in Limine No. 9 to Exclude Evidence of Past Medical Expenses Not Actually Incurred

Client Reference Number
Harrison v. Luxor / 16304

Filing Status Accepted	Accepted Date 9/18/2018 11:26 AM PST
----------------------------------	--

Lead Document

File Name 20180917_JOIN_DME MLIM_09_twm.pdf	Description Joinder - JOIN (CIV)	Security Public Filed Document	Download Original File Court Copy
--	--	--	--

eService Details

Status Name	Firm	Served Date Opened
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Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I**Envelope Information**

Envelope Id 3189537	Submitted Date 9/21/2018 3:23 PM PST	Submitted User Name sibarra@lgdlawoffice.com
-------------------------------	--	--

Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 9/24/2018	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Pre-Trial Disclosure - PTD (CIV)
Filing Description Defendant Ramparts, Inc. dba Luxor Hotel & Casino's List of Trial Witnesses and Exhibits pursuant to NRCP 16.1(a)(3)	
Client Reference Number Harrison v. Luxor / 16304	
Filing Status Accepted	Accepted Date 9/24/2018 7:20 AM PST

Lead Document

File Name	Description	Security	Download
20180921_PTD_Luxor_sdi.pdf	Pre-Trial Disclosure - PTD (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I

Envelope Information

Envelope Id
3197293

Submitted Date
9/24/2018 4:29 PM PST

Submitted User Name
bpederson@lgclawoffice.com

Case Information

Location
Department 29

Category
Civil

Case Type
Negligence - Premises Liability

Case Initiation Date
9/24/2018

Case #
A-16-732342-C

Assigned to Judge
Jones, David M

Filings

Filing Type
EFileAndServe

Filing Code
Opposition - OPPS (CIV)

Filing Description
Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino's Limited Opposition to Plaintiff Vivia Harrison's Motion in Limine No. 1 to Limit Vivia's Testimony to a Reading of Her Deposition Transcript

Client Reference Number
16304 Harrison

Filing on Behalf of
Ramparts Inc

Filing Status
Accepted

Accepted Date
9/24/2018 4:58 PM PST

Lead Document

File Name
20180924_OPPS_MIL_1_Plitf_twm.pdf

Description
Opposition - OPPS (CIV)

Security
Public Filed Document

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eService Details

MGM Resorts International

Name

Desert Medical Equipment

Address

Fees

Opposition - OPPS (CIV)

Description

Filing Fee

Amount

\$0.00

Filing Total: \$0.00

Opposition - OPPS (CIV)

Description

Filing Fee

Amount

\$0.00

Filing Total: \$0.00

Opposition - OPPS (CIV)

Description

Filing Fee

Amount

\$0.00

Filing Total: \$0.00

Opposition - OPPS (CIV)

Description

Filing Fee

Amount

\$0.00

Filing Total: \$0.00

Total Filing Fee

\$0.00

E-File Fee

\$3.50

Envelope Total: \$3.50

Party Responsible for Fees

Ramparts Inc

Transaction Amount

\$3.50

Payment Account

Firm Card-Barb

Transaction Id

3974681

Filing Attorney

Thomas Maroney

Order Id

003197293-0

Transaction Response

Payment Complete

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Version: 2017.2.5.7059

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s)vs.MGM Resorts I

Envelope Information

Envelope Id
3259923

Submitted Date
10/5/2018 4:39 PM PST

Submitted User Name
sibarra@lgclawoffice.com

Case Information

Location
Department 29

Category
Civil

Case Type
Negligence - Premises Liability

Case Initiation Date
2/24/2016

Case #
A-16-732342-C

Assigned to Judge
Jones, David M

Filings

Filing Type
EFileAndServe

Filing Code
Reply - RPLY (CIV)

Filing Description
Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Reply in Support of its Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E. [Motion in Limine No. 1]

Client Reference Number
Harrison v. Luxor / 16304

Filing Status
Accepted

Accepted Date
10/5/2018 4:46 PM PST

Lead Document

File Name
20181005_RPLY_MLIM_01_twm.pdf

Description
Reply - RPLY (CIV)

Security

Download
Original File
Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Julie Kraig	Alverson Taylor & Sanders	Yes	Not Opened
Sent	Courtney Christopher	Alverson Taylor & Sanders	Yes	10/8/2018 9:33 AM F
Sent	Michael Madden		Yes	Not Opened
Sent	Front Desk	Parry & Pfau	Yes	10/8/2018 9:31 AM F
Sent	Rosemarie Frederick		Yes	Not Opened
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Parties with No eService

Name
Desert Medical Equipment

Address

Name
MGM Resorts International

Address

Name
Desert Medical Equipment

Address

Fees

Reply - RPLY (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Reply - RPLY (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total:	\$3.50

Party Responsible for Fees	Ramparts Inc	Transaction Amount	\$3.50
Payment Account	Firm Card-Barb	Transaction Id	4046222

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I**Envelope Information**

Envelope Id 3572019	Submitted Date 12/13/2018 3:42 PM PST	Submitted User Name sibarra@lgclawoffice.com
-------------------------------	---	--

Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Order - ORDR (CIV)
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Filing Description

Order Granting in Part Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E.

Client Reference Number

Harrison v. Luxor / 16304

Filing Status

Accepted

Accepted Date

12/14/2018 7:01 AM PST

Lead Document

File Name	Description	Security	Download
20181213_ORDR_Luxor MIL#1_twm.pdf	Order - ORDR (CIV)		Original File Court Copy

eService Details

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s)vs.MGM Resorts I**Envelope Information****Envelope Id**

3576177

Submitted Date

12/14/2018 12:09 PM PST

Submitted User Name

sibarra@lgclawoffice.com

Case Information**Location**

Department 29

Category

Civil

Case Type

Negligence - Premises Liability

Case Initiation Date

2/24/2016

Case #

A-16-732342-C

Assigned to Judge

Jones, David M

Filings**Filing Type**

EFileAndServe

Filing Code

Notice of Entry of Order - NEOJ (CIV)

Filing Description

Notice of Entry of Order Granting in Part Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E.

Client Reference Number

Harrison v. Luxor / 16304

Filing Status

Accepted

Accepted Date

12/14/2018 12:24 PM PST

Lead Document**File Name**

20181214_NEOJ_Luxor MIL#1_sdi.pdf

Description

Notice of Entry of Order - NEOJ (CIV)

Security**Download**

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eService Details

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I**Envelope Information**

Envelope Id 3484638	Submitted Date 11/26/2018 4:34 PM PST	Submitted User Name sibarra@lgclawoffice.com
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Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Pre-trial Memorandum - PMEM (CIV)
-------------------------------------	---

Filing Description
Defendant Ramparts, Inc. dba Luxor
Hotel & Casino's Pre-Trial Memorandum

Client Reference Number
Harrison v. Luxor / 16304

Filing Status Accepted	Accepted Date 11/26/2018 4:44 PM PST
----------------------------------	--

Lead Document

File Name	Description	Security	Download
20181126_PMEM_twm.pdf	Pre-trial Memorandum - PMEM (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I

Envelope Information

Envelope Id

3516763

Submitted Date

12/3/2018 1:19 PM PST

Submitted User Name

bpederson@lgclawoffice.com

Case Information

Location

Department 29

Category

Civil

Case Type

Negligence - Premises Liability

Case Initiation Date

2/24/2016

Case #

A-16-732342-C

Assigned to Judge

Jones, David M

Filings

Filing Type

EFileAndServe

Filing Code

Trial Subpoena - TSUB (CIV)

Filing Description

Trial Subpoena

Client Reference Number

Harrison 16304

Filing on Behalf of

Ramparts Inc

Filing Status

Accepted

Accepted Date

12/3/2018 1:32 PM PST

Lead Document

File Name

20181203_SUBP_AFDD_Atchley.pdf

Description

Trial Subpoena - TSUB (CIV)

Security

Public Filed Document

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eService Details

Status Name

Sent Boyd B. Moss

Firm

Moss Berg Injury Lawyers

Served Date Opened

Yes Not Opened

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I**Envelope Information**

Envelope Id 3519357	Submitted Date 12/3/2018 4:44 PM PST	Submitted User Name bpederson@lgclawoffice.com
-------------------------------	--	--

Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Trial Subpoena - TSUB (CIV)
Filing Description Trial Subpoena and Acceptance of Service of Trial Subpoena	
Filing on Behalf of Ramparts Inc	16304
Filing Status Accepted	Accepted Date 12/4/2018 7:55 AM PST

Lead Document

File Name	Description	Security	Download
20181203_SUBP_ACPT_Myers.pdf	Trial Subpoena - TSUB (CIV)	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Case # A-16-732342-C - Vivia Harrison, Plaintiff(s) vs. MGM Resorts I

Envelope Information

Envelope Id 3524089	Submitted Date 12/4/2018 1:48 PM PST	Submitted User Name bpederson@igclawoffice.com
-------------------------------	--	--

Case Information

Location Department 29	Category Civil	Case Type Negligence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Trial Subpoena - TSUB (CIV)
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Filing Description
Trial Subpoena

Client Reference Number
Harrison 16304

Filing on Behalf of
Ramparts Inc

Filing Status Accepted	Accepted Date 12/4/2018 1:54 PM PST
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Lead Document

File Name	Description	Security	Download
20181204_SUBP_AOS_Sanchez.pdf	Trial Subpoena - TSUB (CIV)	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boyd B. Moss	Moss Berg Injury Lawyers	Yes	Not Opened

Status	Name	Firm	Served	Date Opened
Sent	LeAnn Sanders	Alverson Taylor & Sanders	Yes	Not Opened
Sent	Julie Kraig	Alverson Taylor & Sanders	Yes	Not Opened
Sent	Courtney Christopher	Alverson Taylor & Sanders	Yes	12/4/2018 2:06 PM F
Sent	Michael Madden		Yes	Not Opened
Sent	Front Desk	Parry & Pfau	Yes	12/5/2018 9:17 AM F
Sent	Rosemarie Frederick		Yes	Not Opened
Sent	Dalilia Baza	Lincoln, Gustafson & Cercos LLP	Yes	12/4/2018 2:15 PM F

← [View All eService Filings](#) →

Parties with No eService

Name
Desert Medical Equipment

Address

Name
MGM Resorts International

Address

Name
Desert Medical Equipment

Address

Fees

Trial Subpoena - TSUB (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total:	\$3.50

Party Responsible for Fees	Ramparts Inc	Transaction Amount	\$3.50
Payment Account	Firm Card-Barb	Transaction Id	4349141
Filing Attorney	Loren Young	Order Id	003524089-0
Transaction Response	Payment Complete		

Court Reporter/Litigation Charges

INVOICE KLG



Litigation
SERVICES

Discovery Depositions Etc.

3770 Howard Hughes Pkwy
Suite 300
Las Vegas, NV 89169
Phone 800 330 1112
LitigationServices.com

Invoice No.	Invoice Date	Job No.
1127828	1/31/2017	371630
Job Date	Case No.	
1/30/2017		
Case Name		
Harrison vs. Luxor		
Payment Terms		
Net 30		

Barbara Privett
Lincoln, Gustafson & Cercos
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

Videography Services for:	
VHS Conversion	230.00
TOTAL DUE >>>	
\$230.00	
AFTER 3/2/2017 PAY	
\$253.00	

Conversion of VHS Cassette to standard DVD
2 Copies of Original VHS / 2 DVD Copies of converted video on standard DVD / 2 Data DVD copies in Mp4 format

Please note, disputes or refunds will not be honored or issued after 30 days

Tax ID: 27 5114755

Phone: 702-257-1997 Fax: 702-257-2203

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Barbara Privett
Lincoln, Gustafson & Cercos
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

Job No. : 371630 BU ID : LV-VID
Case No. :
Case Name : Harrison vs. Luxor
Invoice No. : 1127828 Invoice Date : 1/31/2017
Total Due : \$ 230.00
AFTER 3/2/2017 PAY \$253.00

Remit To: **Litigation Services and Technologies of Nevada, LLC**
P.O. Box 98813
Las Vegas, NV 89193-8813

PAYMENT WITH CREDIT CARD		
Cardholder's Name: _____		
Card Number: _____		
Exp. Date: _____	Phone#: _____	
Billing Address: _____		
Zip: _____	Card Security Code: _____	
Amount to Charge: _____		
Cardholder's Signature: _____		
Email: _____		

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All American Court Reporters
 1160 North Town Center Drive
 Suite 300
 Las Vegas, NV 89144
 Phone: 702.240.4393 Fax: 702.384.5506

Invoice No.	Invoice Date	Job No.
1114933	4/18/2017	1058242
Job Date	Case No.	
4/13/2017	A732342	
Case Name		
Vivia Harrison vs. Ramparts, Inc.		
Payment Terms		
Due upon receipt		

Loren S. Young
 Lincoln, Gustafson & Cercos
 3960 Howard Hughes Pkwy.
 Suite 200
 Las Vegas, NV 89169

Vivia Harrison	
E-Transcript Email + PDF Formats	382.00
PDF EMAIL (EXHIBITS)	1.50
TOTAL DUE >>>	\$383.50

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Service form signed.
 Files sent to: lyoung@gclawoffice.com / dsmith@gclawoffice.com

Luxar
16-304

APR 21 2017

Tax ID: 88-0473546

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Loren S. Young
 Lincoln, Gustafson & Cercos
 3960 Howard Hughes Pkwy.
 Suite 200
 Las Vegas, NV 89169

Invoice No. : 1114933
 Invoice Date : 4/18/2017
 Total Due : \$383.50

515

Remit To: **All American Court Reporters**
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144

Job No. : 1058242
 BU ID : 3-VEGAS
 Case No. : A732342
 Case Name : Vivia Harrison vs. Ramparts, Inc.

HS

INVOICE

All American Court Reporters
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144
Phone: 702.240.4393 Fax: 702.384.5506

Invoice No.	Invoice Date	Job No.
1114940	4/18/2017	1058372
Job Date	Case No.	
4/13/2017	A732342	
Case Name		
Vivia Harrison vs. Ramparts, Inc.		
Payment Terms		
Due upon receipt		

Loren S. Young
Lincoln, Gustafson & Cercos
3960 Howard Hughes Pkwy.
Suite 200
Las Vegas, NV 89169

Stanley Sawamoto	
E-Transcript Email + PDF Formats	352.75
PDF EMAIL (EXHIBITS)	0.50
TOTAL DUE >>>	\$353.25

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Service form signed.
Files sent to: lyoung@lgclawoffice.com / dsmith@lgclawoffice.com

Luxor
16-304

APR 21 2017

Tax ID: 88-0473546

Please detach bottom portion and return with payment.

Loren S. Young
Lincoln, Gustafson & Cercos
3960 Howard Hughes Pkwy.
Suite 200
Las Vegas, NV 89169

Invoice No. : 1114940
Invoice Date : 4/18/2017
Total Due : \$353.25

ENTERED
5/5

Remit To: **All American Court Reporters**
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144

Job No. : 1058372
BU ID : 3-VEGAS
Case No. : A732342
Case Name : Vivia Harrison vs. Ramparts, Inc.



Rocket Reporters
3900 Paradise Road, Suite 155
Las Vegas, Nevada 89169
702.876.2538 (702.8Rocket)
Payments@RocketReporters.com

LSY
19/1

INVOICE

Lincoln, Gustafson & Cercos
ATTN: Loren S. Young, Esq.
3960 Howard Hughes Pkwy
Suite 200
Las Vegas, NV

Invoice Number: 200602
Invoice Date: 08/28/2017
Job Number: 100552

In Re: Harrison v Ramparts, Inc. dba Luxor Hotel, Desert Medical Equipment
Case Number: A-16-732342-C
Witness(s): Gabriella Bush
Attendance Date: 08/07/2017, 9:00am

Reference: AD28523

Luxor
16-304

Description

Deposition of Gabriella Bush
Electronic Transcript Via Email - COMPLIMENTARY
Mini - COMPLIMENTARY

Invoice Total: 480.00

Tax ID: 20-8955398
Invoice disputes must be made within 30 days.

Please remit to
Rocket Reporters, LLC
3900 Paradise Road, Suite 155
Las Vegas, NV 89169

INVOICE DUE WITHIN 30 DAYS.
18.00% APR FINANCE CHARGES WILL BE APPLIED TO ALL INVOICES NOT PAID WITHIN TERMS.
Tax ID: 20-8955398

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2017
AUG 28 2017
6:11 PM

5/9

INVOICE



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depositions

17752 Skypark Circle, Suite 105 Phone: 855 811 DEPO (3376)
Tulsa, OK 74114 www.advanceddepositions.com

Loren S. Young
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

OCT 23 2017

Invoice No.	Invoice Date	Job No.
28436	10/20/2017	28729
Job Date	Case No.	
9/26/2017	A-1-732342-C	
Case Name		
Vivia Harrison v. Ramparts, Inc.		
Payment Terms		
Net 30		

1 CERTIFIED COPY OF TRANSCRIPT OF: Rebecca Charles	752.15
1 CERTIFIED COPY OF TRANSCRIPT OF: Chuck Denmark	617.25
TOTAL DUE >>>	\$1,369.40
AFTER 11/19/2017 PAY	\$1,506.34

Ramparts
16-304

Tax ID: 61-1753102

Please detach bottom portion and return with payment.

Loren S. Young
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

Job No. : 28729 BU ID : 0C-05
Case No. : A-1-732342-C
Case Name : Vivia Harrison v. Ramparts, Inc.

Invoice No. : 28436 Invoice Date : 10/20/2017
Total Due : \$1,369.40
AFTER 11/19/2017 PAY \$1,506.34

PAID 10/30

Remit To: **Advanced Depositions Accounting Office**
1880 John F. Kennedy Boulevard
6th Floor
Philadelphia, PA 19103

PAYMENT WITH CREDIT CARD				
Cardholder's Name:				
Card Number:				
Exp. Date:		Phone#:		
Billing Address:				
Zip:		Card Security Code:		
Amount to Charge:				
Cardholder's Signature:				
Email:				

154
09/21

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Loren S. Young
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

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OCT 24 2017

Invoice No.	Invoice Date	Job No.
28489	10/24/2017	28730
Job Date	Case No.	
9/28/2017	A-1-732342-C	
Case Name		
Vivia Harrison v. Ramparts, Inc.		
Payment Terms		
Net 30		

1 CERTIFIED COPY OF TRANSCRIPT OF:
Diane Lucas

TOTAL DUE >>> **\$853.90**
 AFTER 11/23/2017 PAY ~~\$939.29~~

Ramparts
16-304

Tax ID: 61-1753102

Please detach bottom portion and return with payment.

Loren S. Young
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169

Job No. : 28730 BU ID : 0C-05
 Case No. : A-1-732342-C
 Case Name : Vivia Harrison v. Ramparts, Inc.
 Invoice No. : 28489 Invoice Date : 10/24/2017
 Total Due : **\$853.90**
 AFTER 11/23/2017 PAY \$939.29

RECEIVED
10/30

Remit To: **Advanced Depositions Accounting Office**
1880 John F. Kennedy Boulevard
6th Floor
Philadelphia, PA 19103

PAYMENT WITH CREDIT CARD

Cardholder's Name: _____
 Card Number: _____
 Exp. Date: _____ Phone#: _____
 Billing Address: _____
 Zip: _____ Card Security Code: _____
 Amount to Charge: _____
 Cardholder's Signature: _____
 Email: _____

LSY
11/21/17

INVOICE



Depo International
703 South Eighth Street
Las Vegas, NV 89101
Ph: 800.591.9722 Fax: 702.386.9825

Invoice No.	Invoice Date	Job No.
36936	11/15/2017	32786
Job Date	Case No.	
11/2/2017	A-16-732342-C	
Case Name		
Vivia Harrison vs. Ramparts, Inc., et al.		
Payment Terms		
Due upon receipt (1.5%/mo & collection)		

RECEIVED
NOV 27 2017
BY: _____

Loren S. Young, Esq.
Lincoln, Gustafson & Cercos
Suite 200
3960 Howard Hughes Parkway
Las Vegas, NV 89169

ONE ELECTRONIC CERTIFIED TRANSCRIPT
30(b)(6) Bryan Richard Schultz

646.80
TOTAL DUE >>> \$646.80

If you have any questions, you may contact our billing department:
Billing@depoInternational.com

Thank you for your business!

16-304

ENTERED
11/21/17

Tax ID: 45-0581340

Phone: (702) 257-1997 Fax: (702) 257-2203

Please detach bottom portion and return with payment.

Loren S. Young, Esq.
Lincoln, Gustafson & Cercos
Suite 200
3960 Howard Hughes Parkway
Las Vegas, NV 89169

Job No. : 32786 BU ID : 2-DI LV
Case No. : A-16-732342-C
Case Name : Vivia Harrison vs. Ramparts, Inc., et al.
Invoice No. : 36936 Invoice Date : 11/15/2017
Total Due : \$646.80

Remit To: **Depo International**
703 South Eighth Street
Las Vegas, NV 89101

PAYMENT WITH CREDIT CARD

Cardholder's Name: _____
Card Number: _____
Exp. Date: _____ Phone#: _____
Billing Address: _____
Zip: _____ Card Security Code: _____
Amount to Charge: _____
Cardholder's Signature: _____
Email: _____

Evolve Deposition, LLC
10080 Alta Drive
Suite 100
Las Vegas, NV 89145
(702) 421-3376



INVOICE

Lincoln, Gustafson & Cercos
ATTN: Loren S. Young, Esq.
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-5968

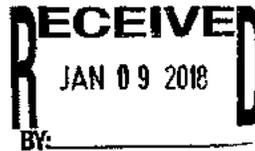
16-304

Invoice Number: 205889
Invoice Date: 01/03/2018
Job Number: 306516
Client Phone: 702.257.1997
Client Fax: 702.257.2203

In Re: Vivia Harrison vs. Ramparts, Inc. dba Luxor Hotel & Casino
Witness(s): 30(b)(6) Designee of Defendant Ramparts, Inc. dba Luxor Hotel & Casino, KIMBERLY
SIGIACOMO
Attendance Date: 12/20/2017, 1:00pm
Location: MOSS BERG INJURY LAWYERS - 4101 Meadows Lane, #2 - Las Vegas, Nevada 89107

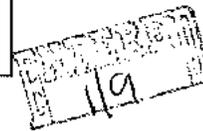
Description

Processing/Conversion of Official Record File
Certified Record of Recording
Transcript Copy
Exhibits - Color/B&W



Invoice Total: 335.84

*****New Corporate Address*****
Please remit all payments to:
Evolve Depositions
10080 Alta Drive, Suite 110
Las Vegas, Nevada 89145
702.421.3376



INVOICE DUE WITHIN 30 DAYS.
18.00% APR FINANCE CHARGES WILL BE APPLIED TO ALL INVOICES NOT PAID WITHIN TERMS.
A 1.50% DISCOUNT IS AVAILABLE IF INVOICE IS PAID WITHIN 30 DAYS.
Tax ID: 47-5294398

Please detach bottom portion and return with payment

Invoice Number: 205889	Cardholder's Name: _____
Invoice Date: 01/03/2018	Card Number: _____
Amount Due: \$335.84	Exp. Date: _____ Phone: _____
Amount Enclosed: \$ _____	Billing Address: _____
CREDIT CARDS ACCEPTED	Zip: _____ Security Code: _____
	Signature: _____

Evolve Deposition, LLC
10080 Alta Drive
Suite 100
Las Vegas, NV 89145
(702) 421-3376



LSY
BY

INVOICE

Lincoln, Gustafson & Cercos
ATTN: Loren S. Young, Esq.
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-5968

Invoice Number: 205891
Invoice Date: 01/03/2018
Job Number: 306600

Client Phone: 702.257.1997
Client Fax: 702.257.2203

16-304

In Re: Vivia Harrison vs. Ramparts, Inc. dba Luxor Hotel & Casino
Witness(s): 30(b)(6) Designee of Defendant Ramparts, Inc. dba Luxor Hotel & Casino, STEVEN
PETERSEN
Attendance Date: 12/20/2017, 2:00pm
Location: MOSS BERG INJURY LAWYERS - 4101 Meadows Lane, #2 - Las Vegas, Nevada 89107

Description

Processing/Conversion of Official Record File
Certified Record of Recording
Transcript Copy
Exhibits - Color/B&W

RECEIVED
JAN - 9 2017
BY: _____

Invoice Total: 310.95

*****New Corporate Address*****
Please remit all payments to:
Evolve Depositions
10080 Alta Drive, Suite 110
Las Vegas, Nevada 89145
702.421.3376

PAID
1/9

INVOICE DUE WITHIN 30 DAYS.
18.00% APR FINANCE CHARGES WILL BE APPLIED TO ALL INVOICES NOT PAID WITHIN TERMS.
A 1.50% DISCOUNT IS AVAILABLE IF INVOICE IS PAID WITHIN 30 DAYS.
Tax ID: 47-5294398

Please detach bottom portion and return with payment

Invoice Number: 205891	Cardholder's Name: _____
Invoice Date: 01/03/2018	Card Number: _____
Amount Due: \$310.95	Exp. Date: _____ Phone: _____
Amount Enclosed: \$ _____	Billing Address: _____
CREDIT CARDS ACCEPTED	Zip: _____ Security Code: _____
  	Signature: _____

Evolve Deposition, LLC
10080 Alta Drive
Suite 100
Las Vegas, NV 89145
(702) 421-3376



LSY
GPK

INVOICE

Lincoln, Gustafson & Cercos
ATTN: Loren S. Young, Esq.
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-5968

Invoice Number: **205904**
Invoice Date: 01/05/2018
Job Number: 306601
Client Phone: 702.257.1997
Client Fax: 702.257.2203

16-304

In Re: Vivia Harrison vs. Ramparts, Inc. dba Luxor Hotel & Casino
Witness(s): 30(b)(6) Designee of Defendant Ramparts, Inc. dba Luxor Hotel & Casino, LYNSDI STULL
Attendance Date: 12/20/2017, 3:00pm
Location: MOSS BERG INJURY LAWYERS - 4101 Meadows Lane, #2 - Las Vegas, Nevada 89107

Description
Processing/Conversion of Official Record File
Certified Record of Recording
Transcript Copy
Exhibits - Color/B&W

RECEIVED
JAN - 9 2017
BY: _____

Invoice Total: 317.89

*****New Corporate Address*****
Please remit all payments to:
Evolve Depositions
10080 Alta Drive, Suite 110
Las Vegas, Nevada 89145
702.421.3376

PAID
1/9

INVOICE DUE WITHIN 30 DAYS.
18.00% APR FINANCE CHARGES WILL BE APPLIED TO ALL INVOICES NOT PAID WITHIN TERMS.
A 1.50% DISCOUNT IS AVAILABLE IF INVOICE IS PAID WITHIN 30 DAYS.
Tax ID: 47-5294398

Please detach bottom portion and return with payment

Invoice Number: 205904	Cardholder's Name: _____
Invoice Date: 01/05/2018	Card Number: _____
Amount Due: \$317.89	Exp. Date: _____ Phone: _____
Amount Enclosed: \$ _____	Billing Address: _____
CREDIT CARDS ACCEPTED	Zip: _____ Security Code: _____
  	Signature: _____

Evolve Deposition, LLC
10080 Alta Drive
Suite 100
Las Vegas, NV 89145
(702) 421-3376



LSY

INVOICE

Lincoln, Gustafson & Cercos
ATTN: Loren S. Young, Esq.
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-5968

Invoice Number: 205953
Invoice Date: 01/30/2018
Job Number: 306544

Client Phone: 702.257.1997
Client Fax: 702.257.2203

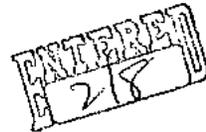
In Re: Vivia Harrison vs. Ramparts, Inc. dba Luxor Hotel & Casino
Witness(s): Michael Zablocky
Attendance Date: 01/18/2018, 1:00pm
Location: MOSS BERG INJURY LAWYERS - 4101 Meadows Lane, #110 - Las Vegas, Nevada 89107

Description
Processing/Conversion of Official Record File
Certified Record of Recording
Transcript Copy
Exhibits - Color/B&W

16-304

Invoice Total: 655.88

*****New Corporate Address*****
Please remit all payments to:
Evolve Reporting Group, LLC
10080 Alta Drive, Suite 110
Las Vegas, Nevada 89145
702.421.3376



INVOICE DUE WITHIN 30 DAYS.
18.00% APR FINANCE CHARGES WILL BE APPLIED TO ALL INVOICES NOT PAID WITHIN TERMS.
A 1.50% DISCOUNT IS AVAILABLE IF INVOICE IS PAID WITHIN 30 DAYS.
Tax ID: 47-5294398

Please detach bottom portion and return with payment

Invoice Number: 205953	Cardholder's Name:
Invoice Date: 01/30/2018	Card Number:
Amount Due: \$655.88	Exp. Date: Phone:
Amount Enclosed: \$	Billing Address:
CREDIT CARDS ACCEPTED	Zip: Security Code:
	Signature:



2700 Centennial Tower
 101 Marietta Street
 Atlanta GA 30303
 888-486-4044
 www.esquireolutions.com
 Tax ID # 45-3463120

Invoice INV1287284

turn

Date 8/1/2018
 Terms Net 30
 Due Date 8/31/2018

Client Number C05750
 Esquire Office Las Vegas
 Proceeding Type Deposition
 Name of Insured
 Adjuster
 Firm Matter/File # 16-304
 Client VAL ID
 Date of Loss

Bill To
 Lincoln Gustafson & Cercos - Las Vegas
 3960 Howard Hughes Parkway
 Suite 200
 Las Vegas NV 89169

Services Provided For
 Lincoln Gustafson & Cercos - Las Vegas
 Maroney, Thomas W
 3960 Howard Hughes Parkway
 Suite 200
 Las Vegas NV 89169

7/19/2018	J2366943	Chicago, ILLINOIS	VIVIA HARRISON, AN INDIVIDUAL VS. RAMPARTS, INC., DBA	
APP FEE: FIRST HOUR	Timothy M. Hicks, P.E.	1	61.00	61.00
APP FEE: ADDITIONAL HOURS	Timothy M. Hicks, P.E.	1	61.00	61.00
TRANSCRIPT - ORIGINAL-EXP-WI	Timothy M. Hicks, P.E.	102	4.20	428.40
EXHIBITS B&W	Timothy M. Hicks, P.E.	35	0.50	17.50
CONDENSED TRANSCRIPT	Timothy M. Hicks, P.E.	1	30.00	30.00
HANDLING FEE	Timothy M. Hicks, P.E.	1	30.00	30.00

Luxar
16-304

RECEIVED
AUG 06 2018

Representing Client: Lincoln Gustafson & Cercos - San Diego : Lincoln Gustafson & Cercos - Las Vegas

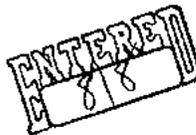
Subtotal 627.90
 Shipping Cost (n/a) 0.00
 Total 627.90
 Amount Due 627.90

Attorney is responsible for payment of all charges incurred. Payment is due by "Due Date" shown on invoice. Failure to pay by "Due Date" may result in the assessment of a late fee. Transcript package typically includes transcript/word index, exhibits, appearance fee, condensed transcript, litigation support disk, shipping, video charges and may include other service charges based on job or region. Some services and rates may vary by job or region. Please contact your local office for specific details and questions. Full Terms and Conditions are viewable online at www.esquireolutions.com/terms-conditions. These stated terms and conditions, to the extent they contradict the rules and regulations in Arizona, do not apply. All aspects of this invoice and other business terms comply with the ethical obligations set forth in the AZ Code of Judicial Administration Section 7-206(J)(1)(g)(3) through (6).

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www.esquireconnect.com

Remit to:
 Esquire Deposition Solutions, LLC
 P.O. Box 846099
 Dallas, TX 75284-6099



Client Name Lincoln Gustafson & Cercos - L...
 Client # C05750
 Invoice # INV1287284
 Invoice Date 8/1/2018
 Due Date 8/31/2018
 Amount Due \$ 627.90

turn



2700 Centennial Tower
 101 Marietta Street
 Atlanta GA 30303
 888-486-4044
 www.esquireolutions.com
 Tax ID # 45-3463120

Invoice INV1288997

turn

Date 8/3/2018 Client Number C05750
 Terms Net 30 Esquire Office Las Vegas
 Due Date 9/2/2018 Proceeding Type Deposition
 Name of Insured
 Adjuster
 Firm Matter/File # 16-304
 Client VAL ID
 Date of Loss

Bill To
 Lincoln Gustafson & Cercos - Las Vegas
 3960 Howard Hughes Parkway
 Suite 200
 Las Vegas NV 89169

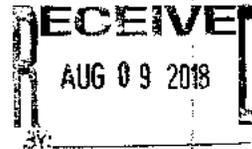
Services Provided For
 Lincoln Gustafson & Cercos - Las Vegas
 Maroney, Thomas W
 3960 Howard Hughes Parkway
 Suite 200
 Las Vegas NV 89169

7/20/2018 J2366832 Los Angeles, CALIFORNIA

VIVIA HARRISON, AN INDIVIDUAL VS. RAMPARTS, INC., DBA

TRANSCRIPT - O&I-EXP-WI	Michael P. Gibbens	66	6.25	412.50
	Michael P. Gibbens	1	0.00	0.00
CONDENSED TRANSCRIPT	Michael P. Gibbens	1	16.00	16.00
EXHIBITS W/TABS	Michael P. Gibbens	26	0.50	13.00
HANDLING FEE	Michael P. Gibbens	1	60.00	60.00
ORIGINAL COMPLIANCE FEE	Michael P. Gibbens	1	0.00	0.00
WITNESS READ & SIGN LETTER	Michael P. Gibbens	1	0.00	0.00

*Luxur
16-304*



Representing Client: Lincoln Gustafson & Cercos - San Diego, Lincoln Gustafson & Cercos - Las Vegas

Subtotal	501.50
Shipping Cost (FedEx)	22.95
Total	524.45
Amount Due	\$524.45

Attorney is responsible for payment of all charges incurred. Payment is due by "Due Date" shown on invoice. Failure to pay by "Due Date" may result in the assessment of a late fee. Transcript package typically includes transcript/word index, exhibits, appearance fee, condensed transcript, litigation support disk, shipping, video charges and may include other service charges based on job or region. Some services and rates may vary by job or region. Please contact your local office for specific details and questions. Full Terms and Conditions are viewable online at www.esquireolutions.com/terms-conditions. These stated terms and conditions, to the extent they contradict the rules and regulations in Arizona, do not apply. All aspects of this invoice and other business terms comply with the ethical obligations set forth in the AZ Code of Judicial Administration Section 7-206(J)(1)(g)(3) through (6).

Please detach and return this bottom portion with your payment or pay online at

www.esquireconnect.com

Remit to:
 Esquire Deposition Solutions, LLC
 P.O. Box 846099
 Dallas, TX 75284-6099



Client Name Lincoln Gustafson & Cercos - L...
 Client # C05750
 Invoice # INV1288997
 Invoice Date 8/3/2018
 Due Date 9/2/2018
 Amount Due \$ 524.45

turn

RECORDER/TRANSCRIBER BILLING INFORMATION

turn ✓

DATE OF INVOICE: 10/03/18

CASE NO:	A-16-732342-C			RECEIVED OCT - 8 2018 BY: _____
CASE NAME:	Vivia Harrison vs. MGM Resorts			
HEARING DATE(S):	09/24/18			
DEPT. NO:	XXIX Melissa Murphy-Delgado 702-671-0889			
ORDERED BY:	Thomas Maroney Esq. (sibarra@lgclawoffice.com)			
FIRM NAME:				
PHONE/EMAIL:				
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 (Include case number on check)			
	<u>Mailing Address:</u> Regional Justice Center Fiscal Services Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155		<u>Pay by Phone (credit card):</u> Cashier (702) 671-4507	
BILL AMOUNT:		CDs @ \$25 each =		\$
	1	Hours @ \$40 an hour recording fee		\$40.00
		Pages @	per page of trans.	\$
	Total			\$40.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to: Kennedy Court Reporters Tax Id#			
BILL AMOUNT:	27	pages @	5.01	per page of trans \$135.27
DATE PAID:				
	TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED			

TWM
 (ob)

RECORDER/TRANSCRIBER BILLING INFORMATION

DATE OF INVOICE: 11/14/18

16-304

CASE NO:	A-16-732342-C			
CASE NAME:	Vivia Harrison vs. MGM Resorts International			
HEARING DATE(S):	10/12/18			
DEPT. NO:	XXIX Melissa Murphy-Delgado 702-671-0889			
ORDERED BY: FIRM NAME: PHONE/EMAIL:	Thomas Maroney, Esq. (sibarra@lgelawoffice.com)			
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 (Include case number on check) <u>Mailing Address:</u> Regional Justice Center Fiscal Services Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155 <u>Pay by Phone (credit card):</u> Cashier (702) 671-4507			
BILL AMOUNT:		CDs @ \$25 each =		
	2	Hours @ \$40 an hour recording fee		\$80.00
		Pages@	per page of trans.	\$
	Total			\$80.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to: Kennedy Court Reporters Tax ID # 95-3817218			
BILL AMOUNT:	127	pages @ 3.80	per page of trans	\$482.60
DATE PAID:				
TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED				

LSY
OK

INVOICE

Kennedy Court Reporters
920 West 17th Street, Suite F
Santa Ana, California 92706
(800) 231-2682

Invoice No.	Invoice Date	Job No.
22254	12/17/2018	21243
Job Date	Case No.	
12/13/2018	A-732342-C	
Case Name		
Harrison vs. Luxor - LV		
Payment Terms		
Due upon receipt		

RECEIVED
DEC 17 2018
BY:

Loren S. Young, Esq.
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

ORIGINAL TRANSCRIPT OF:
DOH: 12/12/18 - Opening Statement

16.00 Pages 80.16

TOTAL DUE >>> \$80.16

Audio transcription requested by Ms. Melissa Delgado-Murphy, Court Recorder for the Eighth Judicial District Court

Reporter: Brywn Whatford

Rate is based on a 4 day turnaround / \$5.01 per page

(-) Payments/Credits: 0.00
(+) Finance Charges/Debits: 0.00
(=) **New Balance: \$80.16**

*Ramparts
16-304*

Tax ID: 95-3817218

Please detach bottom portion and return with payment.

Loren S. Young, Esq.
Lincoln Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

Invoice No. : 22254
Invoice Date : 12/17/2018
Total Due : \$80.16

Remit To: **Kennedy Court Reporters, Inc**
920 W. 17th St.
2nd Floor
Santa Ana, CA 92706

Job No. : 21243
BU ID : 1-MAIN
Case No. : A-732342-C
Case Name : Harrison vs. Luxor - LV

Expert Charges

SKS

100 PIPPLE AVENUE, SUITE 340
WALKIT CREEK, CA 94596
[T] 925 934 3235 [F] 925 407 0400
[TOLL FREE] 800 822 6624
WWW.MKA.COM

MKA Madsen, Kneppers & Associates, Inc.
Construction Consultants & Engineers

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DEC - 4 2017
BY: _____

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

Attention: Loren Young, Esq.

16-304

Invoice No. 1138162
Project No. 2017.2647
October 29, 2017
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

Consulting Services Rendered: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:

Robbins, Michelle	11.9 Hrs. @	\$225.00 /Hr.	2,677.50
Allard, Ashley	0.9 Hr. @	\$195.00 /Hr.	175.50
Support Services	3.2 Hrs. @	\$75.00 /Hr.	240.00
	<i>Sub-Total:</i>		<u>3,093.00</u>

October Billing **Total** \$ 3,093.00

ATLANTA :: AUSTIN :: CHICAGO :: COLUMBUS :: DALLAS :: DENVER :: DETROIT :: HOUSTON :: LAS VEGAS :: LOS ANGELES :: MIAMI :: NEW ORLEANS :: ORLANDO
PENSACOLA :: PHOENIX :: PORTLAND :: PRINCETON :: SACRAMENTO :: SAN DIEGO :: SAN FRANCISCO :: SEATTLE :: SPOKANE :: TAMPA





Madsen, Kneppers & Associates, Inc.
 Construction Consultants & Engineers

100 PRINGLE AVENUE, Suite 300
 WALNUT CREEK, CA 94598
 (T) 925 934 3235 (F) 925 934 3884
 (TOLL FREE) 800 822 6624
 WWW.MKAINC.COM

Invoice No. 1138162
 Project No. 2017.2647
 October 29, 2017

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Robbins, Michelle

08/30/17	2.3 Hrs.	Meet with attorney, L. Young. Visit site.
09/01/17	2.9 Hrs.	Analyze documents received.
09/19/17	6.7 Hrs.	Continue to analyze documents. Prepare letter report.
Total Hours:	11.9 Hrs.	

Allard, Ashley

10/12/17	0.9 Hr.	Peer review of MJR report, Watch video of security response to incident.
Total Hours:	0.9 Hr.	

Support Services

08/31/17	2.1 Hrs.	Set up documents for expert's review (DEF000:39, security video, deposition transcripts from Vivia Harrison and Stan Sawamoto, complaint, 1st and 2nd amended complaints, plaintiff's responses to interrogatories, requests for admission and production of documents from Desert Medical Equipment, Luxor, Pride Mobility Products and Stan Sawamoto).
09/18/17	0.1 Hr.	Set up documents for expert's review (DEF0103).
10/17/17	0.8 Hr.	Set up documents for expert's review (depositions and exhibits for Diane Lucas, Rebecca Charles and Chuck Denmark).
10/24/17	0.2 Hr.	Set up documents for expert's review (plaintiff's response to Desert Medical's 2nd interrogatories and plaintiff's supplemental response to Luxor's 2nd interrogatories).
Total Hours:	3.2 Hrs.	

Project Total:	16.0 Hrs.
-----------------------	------------------

LSY
LSH

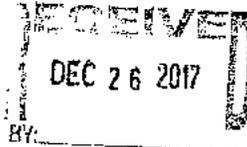
100 PRINGLE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
(T) 925.934.3235 : (F) 925.407.0400
[TOLL FREE] 800.822.6624
WWW.MKAINC.COM

MKA Madsen, Kneppers & Associates, Inc.
Construction Consultants & Engineers
100% Employee Owned Company

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

Attention: Loren Young, Esq.



Invoice No. 1139441
Project No. 2017.2647
November 26, 2017
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivian Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

Consulting Services Rendered: Vivian Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:

Robbins, Michelle	3.6 Hrs. @	\$225.00 /Hr.	810.00
Allard, Ashley	12.7 Hrs. @	\$195.00 /Hr.	2,476.50
Support Services	1.2 Hrs. @	\$75.00 /Hr.	90.00
	<i>Sub-Total:</i>		<u>3,376.50</u>

November Billing

Total \$ 3,376.50

16-304





Madsen, Kneppers & Associates, Inc.
 Construction Consultants & Engineers
 100% Employee Owned Company (USIA)

100 PRINGLE AVENUE SUITE 340
 WALNUT CREEK, CA 94598
 (T) 925.934.3235 :: (F) 925.934.3804
 [TOLL FREE] 800.822.6624
 WWW.MKAINC.COM

Invoice No. 1139441
 Project No. 2017.2647
 November 26, 2017

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Robbins, Michelle

11/02/17	3.6 Hrs.	Letter Report - Analyze and edit with ASA. Issue report.
Total Hours:	3.6 Hrs.	

Aillard, Ashley

11/01/17	7.5 Hrs.	Letter Report - Analyze depositions, analyze and edit report, edit per MJR review
11/02/17	5.2 Hrs.	Letter Report - Continue to analyze depositions, analyze and edit report with MJR, edit per MJR review
Total Hours:	12.7 Hrs.	

Support Services

11/02/17	1.2 Hrs.	Letter Report - Complete final set up.
Total Hours:	1.2 Hrs.	

Project Total:	17.5 Hrs.
-----------------------	------------------

154
691

100 PRINCE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
(T) 925.934.3235 • (F) 925.407.0400
(TOLL FREE) 800.822.6674
WWW.MKANCO.COM

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Construction Consultants & Engineers
100% Employee Owned Company

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FEB 22 2018

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

Attention: Loren Young, Esq.

Invoice No. 1142004
Project No. 2017.2647
January 28, 2018
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

Consulting Services Rendered: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:

Allard, Ashley	2.3 Hrs. @	\$195.00 /Hr.	448.50
Support Services	0.4 Hr. @	\$75.00 /Hr.	30.00
	<i>Sub-Total:</i>		<u>478.50</u>

January Billing

Total \$ 478.50

16-304

ENTERED
2/26





100 PRINGLE AVENUE, SUITE 340
 WALNUT CREEK, CA 94598
 (T) 925 934 3235 (F) 925 934 3884
 [TOLL FREE] 800.822.6024
 WWW.MKACONS.COM

Invoice No. 1142004
 Project No. 2017.2647
 January 28, 2018

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Allard, Ashley

01/26/18	2.3 Hrs.	Attend visual inspection at Backstage Deli located at 3900 S Las Vegas Blvd.
Total Hours:	2.3 Hrs.	

Support Services

01/02/18	0.4 Hr.	Set up documents for expert's analysis (CME Inspection photos 00001-42, HARRISON003665-3758).
Total Hours:	0.4 Hr.	

Project Total:	2.7 Hrs.
-----------------------	-----------------

twm

100 PRINGLE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
(T) 925.934.3235 : (F) 925.467.0400
(TOLL FREE) 800.822.6624
WWW.MKAIANIC.COM

MKA Madsen, Kneppers & Associates, Inc.

Construction Consultants & Engineers
100% Employee Owned Company

RECEIVED
JUN 18 2018

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

Invoice No. 1146740
Project No. 2017.2647
May 27, 2018
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

16-304

Attention: Loren Young, Esq.

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

Consulting Services Rendered: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:

Robbins, Michelle	0.8 Hr. @	\$225.00 /Hr.	180.00
Allard, Ashley	6.1 Hrs. @	\$195.00 /Hr.	1,189.50
Support Services	1.2 Hrs. @	\$75.00 /Hr.	90.00
	<i>Sub-Total:</i>		<u>1,459.50</u>

Expenses:

Printing and Reproduction			36.40
	<i>Sub-Total:</i>		<u>36.40</u>

May Billing

Total \$ 1,495.90

ENTERED
6/25

ATLANTA :: AUSTIN :: CHICAGO :: COLUMBUS :: DALLAS :: DENVER :: DETROIT :: HOUSTON :: LAS VEGAS :: LOS ANGELES :: MIAMI :: NEW ORLEANS :: ORLANDO
PENSACOLA :: PHOENIX :: PORTLAND :: PRINCETON :: SACRAMENTO :: SAN DIEGO :: SAN FRANCISCO :: SEATTLE :: SPOKANE :: TAMPA


twm



Madsen, Kneppers & Associates, Inc.

Construction Consultants & Engineers
100% Employee Owned Company (USA)

100 PRINCIPAL AVENUE, SUITE 340
VALHUT CREEK, CA 94508
(T) 925.934.3235 ; (F) 925.934.3884
{ TOLL FREE } 800.822.6824
WWW.MKAKNC.COM

Invoice No. 1146740
Project No. 2017.2647
May 27, 2018

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Robbins, Michelle

05/08/18	0.8 Hr.	Letter Report - Analyze and edit with ASA. Issue report.
Total Hours:	0.8 Hr.	

Allard, Ashley

03/08/18	0.6 Hr.	Analyze ADA for discussion with client regarding plaintiff's request for production.
05/07/18	2.6 Hrs.	Letter Report - Analyze documents and photos received after 11/2/17.
05/08/18	0.8 Hr.	Letter Report - Analyze and edit report, analyze with MJR
05/22/18	1.6 Hrs.	Analyze plaintiff's expert disclosures.
05/23/18	0.5 Hr.	Call with T. Maroney to discuss plaintiff's expert disclosures.
Total Hours:	6.1 Hrs.	

Support Services

02/19/18	0.1 Hr.	Set up plaintiff's 1st request for the production of documents for expert's analysis.
05/08/18	0.8 Hr.	Letter Report - Finalize and package letter, dated 5/8/18 with backup and send to client.
05/14/18	0.3 Hr.	Set up documents for expert's analysis (HARRISON4343-4465).
Total Hours:	1.2 Hrs.	

Project Total:	8.1 Hrs.
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2017.2641

IN HOUSE EXPENSES - MKA LAS VEGAS OFFICE - FEBRUARY 2018

		Reproductions					MISC					
Project #	Project Name	Color Copies \$.75 ea	Black & White Copies \$.15 ea	Photos \$.49 ea	Photos taken by	Date	Reproduction Sub-Total	Binders \$20.00 ea	Flashdrives \$15.00 ea	Misc Sub-Total	Sub-Total	Grand Total
2017.2641	Harrison, Vivian v. Hartzana Inc.			91	ASA	1/26/2018	\$36.40			\$0.00	\$36.40	\$36.40

Project: 2017.2647
Invoice Date: 5/27/2018

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Invoice	Date	Name	Description	Cost Amt	Bill Amt
01HR.LV.0218	2/25/2018	Printing and Reproduction	Digital Photos - 91 @ \$0.40	\$36.40	\$36.40
Total:				\$36.40	\$36.40
Total for 2017.2647:				\$36.40	\$36.40

twm

100 PRINGLE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
[T] 925.934.3235 [F] 925.934.1389
[TOLL FREE] 800.822.6624
WWW.MKAINC.COM

MKA Madsen, Kneppers & Associates, Inc.

Construction Consultants & Engineers
100% Employee Owned Company

RECEIVED
JUL 16 2018
BY: _____

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169
Attention: Loren Young, Esq.

Invoice No. 1147854
Project No. 2017.2647
June 24, 2018
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

16-304

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

Consulting Services Rendered: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:			
Robbins, Michelle	4.6 Hrs. @	\$225.00 /Hr.	1,035.00
Allard, Ashley	16.4 Hrs. @	\$195.00 /Hr.	3,198.00
Support Services	1.1 Hrs. @	\$75.00 /Hr.	82.50
	<i>Sub-Total:</i>		<u>4,315.50</u>

June Billing **Total** \$ 4,315.50

Submitted 7/17/18.

twm

Invoice No. 1147854
Project No. 2017.2647
June 24, 2018

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Robbins, Michelle

06/14/18	4.6 Hrs.	Letter Report - Analyze and edit Rebuttal Reports to plaintiff's designation of experts with ASA.
Total Hours:	4.6 Hrs.	

Allard, Ashley

05/31/18	2.1 Hrs.	Letter Report - Analyze plaintiff's expert reports. Discuss with T. Maroney (Lincoln, Gustafson).
06/04/18	2.1 Hrs.	Letter Report - Continue to analyze ADA requirements and plaintiff's experts reports (Gibbens, Hicks).
06/05/18	7.6 Hrs.	Letter Report - Prepare rebuttal to plaintiff's expert's, Gibbens and Hicks.
06/14/18	4.6 Hrs.	Letter Report - Analyze and edit with MJR. Edit per MJR analysis.
Total Hours:	16.4 Hrs.	

Support Services

06/14/18	1.1 Hrs.	Finalize and package Rebuttal Letter Reports for Hicks and Gibbens, dated 6/14/18, and send to client.
Total Hours:	1.1 Hrs.	

Project Total:	22.1 Hrs.
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TWM

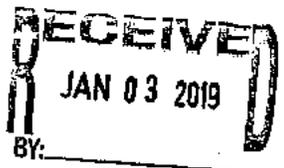
MKA Madsen, Kneppers & Associates, Inc.

100 PRINGLE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
(T) 925.934.9235 :: (F) 925.934.1389
[TOLL FREE] 800.822.8624
WWW.MKAINC.COM

Construction Consultants & Engineers
100% Employee Owned Company

Billing Invoice

Lincoln, Gustafson & Cercos, LLP
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169



Invoice No. 1154119
Project No. 2017.2647
December 30, 2018
Fed ID No. 84-0917753
Project Manager:
Michelle Robbins

Attention: Loren Young, Esq.

Lincoln, Gustafson & Cercos File No. 16-304
Case Name: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.
Case No. Clark County A-16-732342-C
Client Represents: Luxor Hotel and Casino, Defendant: Other

16-304

Consulting Services Rendered: Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Professional Services:

Robbins, Michelle (Expert Testimony)	2.2 Hrs. @	\$395.00 /Hr.	869.00
Robbins, Michelle	11.6 Hrs. @	\$250.00 /Hr.	2,900.00
Support Services	0.9 Hr. @	\$75.00 /Hr.	67.50
	<i>Sub-Total:</i>		<u>3,836.50</u>

December Billing

Total \$ 3,836.50



Madsen, Kneppers & Associates, Inc.

Construction Consultants & Engineers

100% Employee Owned Company

100 PRINGLE AVENUE, SUITE 340
WALNUT CREEK, CA 94596
(T) 925.934.3235 : (F) 925.934.1389
(TOLL FREE) 800.622.6624
WWW.MKAINC.COM

Invoice No. 1154119

Project No. 2017.2647

December 30, 2018

Billing Invoice Detail

Vivia Harrison v. Ramparts, Inc dba Luxor Hotel & Casino, et al.

Robbins, Michelle (Expert Testimony)

12/17/18	2.2 Hrs.	Testimony at trial.
Total Hours:	2.2 Hrs.	

Robbins, Michelle

12/04/18	2.9 Hrs.	Meeting with client regarding upcoming trial and client's office.
12/10/18	3.9 Hrs.	Review job file to prepare for trial.
12/15/18	2.2 Hrs.	Watch trial testimony of Michael Gibbons.
12/17/18	2.6 Hrs.	Attend pre-trial meeting with client. Travel time to and from trial.
Total Hours:	11.6 Hrs.	

Support Services

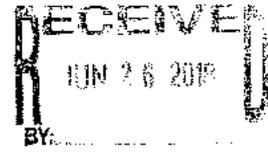
09/26/18	0.3 Hr.	Set up documents for expert's analysis (plaintiff's opposition to Defense motion for summary judgement, plaintiff motion in limine to limit MJR opinions, Kafani v. Starbucks and Chapman v. Pier 1 transcripts).
12/05/18	0.3 Hr.	Print photos: ASA 1/26/18. Set up Michael Gibbons deposition for expert's analysis.
12/13/18	0.3 Hr.	Set up motion in limine hearing transcript from 10/12/18 for expert's analysis.
Total Hours:	0.9 Hr.	

Project Total: 14.7 Hrs.

Vocational Diagnostics Inc.

3030 N Central Avenue
 Suite 603
 Phoenix, AZ 85012
 Telephone: (602) 285-0625
 Fax: (602) 264-4838

turn



6/20/2018
 Invoice No. 22111

Lincoln, Gustafson & Cercos, L.L.P
 Thomas Maroney, Esq.
 3960 Howard Hughes Parkway
 Suite 200
 Las Vegas, NV 89169

*Reports
 16-3044*

Client Number: 526 Lincoln, Gustafson & Cercos, L.L.P - NV
 Matter Number: 18L 1607-10866L Harrison, Vivia (Sub-1)
 PRORATIONS HAVE BEEN COMPLETED - PLEASE PAY THE FULL AMOUNT OF THIS INVOICE

For Services Rendered Through 6/10/2018.

Split Billing Fees

<u>Date</u>	<u>Time Keeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/6/2018	AAC	Preliminary review of records; case analysis	0.40	\$140.00
6/6/2018	PAP	Initial, one time Administrative Fee.	0.00	\$200.00
6/7/2018	KBM	Review records of Desert Radiologists, HealthSouth, Ridgeview Health Services, Shadow Emergency Physicians, Spring Valley Hospital Medical Center and Medical Record Review by Leo Germin, M.D. with development of medical record summary	5.90	\$1,770.00
6/7/2018	SAT	Review and summary of the pleadings and the depositions of Vivia Harrison (75 pages) and Stanley Sawamoto (62 pages).	4.50	\$1,350.00
6/7/2018	HDW	Initial review of Preliminary Life Care Plan of Sarah Lustig, RN, CLCP, CNLCP, CBIS and initial review of medical records	1.20	\$360.00
Billable Hours / Fees:			0.00	\$0.00
Flat Charge Hours / Fees:			12.00	\$3,820.00

Clients' Percentage of Fees: 34.00 % Split Billing Fees Due on this Invoice: \$1,298.80

Continued On Next Page

6/29
Talbot

Client Number: 526
Matter Number: 18L 1607-10866L

6/20/2018
Page: 2

Timekeeper Summary

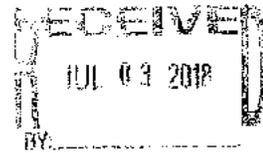
Timekeeper AAC worked 0.14 flat charge hours totaling \$47.60.
Timekeeper HDW worked 0.41 flat charge hours totaling \$122.40.
Timekeeper KBM worked 2.01 flat charge hours totaling \$601.80.
Timekeeper PAP - flat charges totaling \$68.00.
Timekeeper SAT worked 1.53 flat charge hours totaling \$459.00.

Prior Balance:	\$0.00
Payments Received:	\$0.00
Current Fees:	\$0.00
Split Billing Current Fees:	\$1,298.80
Advanced Costs:	\$0.00
Split Billing Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$1,298.80

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Vocational Diagnostics Inc.

3030 N Central Avenue
Suite 603
Phoenix, AZ 85012
Telephone: (602) 285-0625
Fax: (602) 264-4838



6/29/2018

Invoice No. 22181

Lincoln, Gustafson & Cercos, LLP
Thomas Maroney, Esq.
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

16-304

Client Number: 526 Lincoln, Gustafson & Cercos, LLP - NV
Matter Number: 18L 1607-10866L Harrison, Vivia (Sub-1)
PRORATIONS HAVE BEEN COMPLETED - PLEASE PAY THE FULL AMOUNT OF THIS INVOICE

For Services Rendered Through 6/25/2018.

Split Billing Fees

<u>Date</u>	<u>Time Keeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/11/2018	KBM	Discussion with Aubrey Corwin, Director, Sydney Thompson, Vocational Consultant Heidee White, Nurse Consultant and Life Care Planner re: assessment of future care needs and case analysis	0.90	\$270.00
6/11/2018	AAC	Discussion with Sydney Thompson, Vocational Consultant, Kelly McMillan, Senior Nurse Consultant, and Heidee White, Nurse Consultant and Life Care Planner, re: assessment of future care needs, case analysis	0.90	\$315.00
6/11/2018	SAT	Discussion with Aubrey Corwin, Director, Heidee White, Nurse Consultant and Life Care Planner, and Kelly McMillan, Senior Nurse Consultant, re: assessment of future care needs, case analysis.	0.90	\$270.00
6/11/2018	HDW	Discussion with Sydney Thompson, Vocational Consultant Kelly McMillan, Senior Nurse Consultant, and Aubrey Corwin, Director, re: assessment of future care needs, case analysis	0.90	\$270.00
6/11/2018	KBM	Development of pre-existing conditions / co-morbidities: final review and revise medical record summary	0.80	\$240.00
6/11/2018	RHT	Review and analysis of Sarah Lustig RN Life Care Plan and projected costs of care	0.70	\$311.50
6/11/2018	AAC	Discussion with Thomas Maroney, Esq. re case status	0.50	\$175.00

Continued On Next Page

Submitted 7/16/18

6/12/2018	HDW	Continued review of Sarah Lustig Life Care Plan, calculation of life expectancy and development of assessment of future care needs and rebuttal to Ms. Lustig's Life Care Plan	4.20	\$1,260.00
6/12/2018	AAC	Discussion with Tom Maroney, Esq. re case status	0.40	\$140.00
6/13/2018	SAT	Development of preliminary assessment of future care needs.	0.60	\$180.00
6/14/2018	KBM	Review Neurology Case Review by Clifford Segil, D.O. with update to the medical record summary	0.40	\$120.00
6/14/2018	RHT	Discussion with Aubrey Corwin, Director, and revision of assessment of future care needs narrative report	1.00	\$445.00
6/14/2018	HDW	Review of Dr. Segil's expert report	0.30	\$90.00
6/14/2018	AAC	Review of records; development of rebuttal report; case analysis. Final review and revisions made.	3.90	\$1,365.00
Billable Hours / Fees:			0.00	\$0.00
Flat Charge Hours / Fees:			16.40	\$5,451.50

Clients' Percentage of Fees: 34.00 % Split Billing Fees Due on this Invoice: \$1,853.51

Timekeeper Summary

Timekeeper AAC worked 1.95 flat charge hours totaling \$678.30.
 Timekeeper HDW worked 1.84 flat charge hours totaling \$550.80.
 Timekeeper KBM worked 0.72 flat charge hours totaling \$214.20.
 Timekeeper RHT worked 0.58 flat charge hours totaling \$257.21.
 Timekeeper SAT worked 0.51 flat charge hours totaling \$153.00.

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Continued On Next Page

Client Number: 526
Matter Number: 18L 1607-10866L

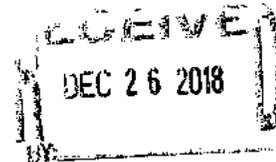
6/29/2018
Page: 3

Prior Balance:	\$1,298.80
Payments Received:	\$0.00
Current Fees:	\$0.00
Split Billing Current Fees:	\$1,853.51
Advanced Costs:	\$0.00
Split Billing Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$3,152.31

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Vocational Diagnostics Inc.

3030 N Central Avenue
Suite 603
Phoenix, AZ 85012
Telephone: (602) 285-0625
Fax: (602) 264-4838



turn

12/19/2018

Invoice No. 23048

Lincoln, Gustafson & Cercos, LLP
Thomas Maroney, Esq.
3960 Howard Hughes Parkway
Suite 200
Las Vegas, NV 89169

TOTAL = \$8319.08
LGC'S 1/2 share = \$4159.54

Client Number: 526 Lincoln, Gustafson & Cercos, LLP - NV

Matter Number: 18L 1607-10866L Harrison, Vivia (Sub-1)

PRORATIONS HAVE BEEN COMPLETED - PLEASE PAY THE FULL AMOUNT OF THIS INVOICE

For Services Rendered Through 12/19/2018.

Split Billing Fees

<u>Date</u>	<u>Time Keeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/26/2018	AAC	Discussion with Loren Young, Esq. re case status	0.50	\$150.00
12/13/2018	KBM	Review additional records of Encore Rehabilitation and Simon Williamson Clinic with update to the medical record summary	3.70	\$925.00
12/17/2018	AAC	Travel to DIA from Boulder office	1.00	\$300.00
12/17/2018	AAC	Wait time at airport; flight time to Las Vegas	3.50	\$1,050.00
12/17/2018	AAC	Meeting with Loren Young, Esq. re trial prep	3.00	\$900.00
12/17/2018	AAC	Travel from LAS to Lincoln, Gustafson & Cercos office	0.40	\$120.00
12/17/2018	AAC	Travel from Lincoln, Gustafson & Cercos office to hotel	0.50	\$150.00
12/17/2018	AAC	Continued trial preparation.	1.60	\$480.00
12/18/2018	RHT	Discussion with Aubrey Corwin, Director, re: Sarah Lustig Life Care Plan and trial preparation	0.70	\$276.50
12/18/2018	AAC	Travel from hotel to courthouse	0.40	\$120.00
12/18/2018	AAC	Wait time at courthouse	1.00	\$300.00
12/18/2018	AAC	Travel from courthouse to LAS airport	0.50	\$150.00
12/18/2018	AAC	Wait time at airport for flight to DIA	1.50	\$450.00

Continued On Next Page

Client Number: 526
Matter Number: 18L 1607-10866L

12/19/2018
Page: 2

12/18/2018	AAC	Travel from DIA to Boulder office	1.00	\$300.00
12/18/2018	AAC	Flight time from LAS to DIA	2.10	\$630.00
12/18/2018	AAC	Trial prep; review video of Ms. Lustig testimony	2.80	\$840.00
			Billable Hours / Fees:	0.00 \$0.00
			Flat Charge Hours / Fees:	24.20 \$7,141.50

Clients' Percentage of Fees: 34.00 % Split Billing Fees Due on this Invoice: \$2,428.11

Timekeeper Summary

Timekeeper AAC worked 6.73 flat charge hours totaling \$2,019.60.
Timekeeper KBM worked 1.26 flat charge hours totaling \$314.50.
Timekeeper RHT worked 0.24 flat charge hours totaling \$94.01.

Split Billing Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
12/17/2018	Lyft from airport to Lincoln Gustafson & Cercos office	\$15.24	
12/17/2018	Lyft from Lincoln Gustafson & Cercos office to hotel	\$14.57	
12/18/2018	Airfare	\$721.96	
12/18/2018	Lodging	\$226.44	
12/18/2018	Tolls	\$18.00	
12/18/2018	Lyft from courthouse to airport	\$21.80	
12/18/2018	Parking at DIA	\$33.00	
12/18/2018	Mileage from office to DIA (roundtrip)	\$49.50	
12/18/2018	Meals	\$77.07	
		Total Costs	\$1,177.58

Client's Percentage of Costs: 34.00 % Split Costs Due on this Invoice: \$400.37

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/9/2018	Lincoln Gustafson & Cercos applied to Inv 22181 - Check Number 70732	(\$1,853.51)
12/19/2018	Lincoln Gustafson & Cercos prepayment for Aubrey Corwin's trial testimony scheduled on 12/18/18 - Check Number 71267	(\$2,141.52)
		Total Payments Received: (\$3,995.03)

Continued On Next Page

Client Number: 526
Matter Number: 18L 1607-10866L

12/19/2018
Page: 3

Prior Balance:	\$1,853.51
Payments Received:	(\$3,995.03)
Current Fees:	\$0.00
Split Billing Current Fees:	\$2,428.11
Advanced Costs:	\$0.00
Split Billing Advanced Costs:	\$400.37
TOTAL AMOUNT DUE:	\$686.96

Last Payment: 12/19/2018

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Tamm

Clifford Segil, D.O.
Neurologist
Clinical Neurophysiology
Diplomate, American Board of Psychiatry and Neurology
NEUROLOGY MEDICAL EXPERT INVOICE

Alverson, Taylor, Mortensen & Sanders
Courtney Christopher, Esq.
7401 West Charleston Blvd
Las Vegas, Nevada 89117 - 1401
O 702.384.7000
F 702.385.7000

ATTN:STEPHANIE - BILLING
sprescott@alversonstaylor.com

Stephanie
Thank you for your help with this
invoice.
Cliff Segil / Neurologist

Re: **Harrison v Desert Medical Equipment**
Client: **Marquis-at Plaza Regency**
Claimant: **Vivia Harrison**
Date of birth: **8/19/1934**
Date of incident: **12/10/2014**
File No **23646**

Ramparts 16-304

December 20, 2018

Attached is an invoice for my professional assistance with this matter. I can send itemized travel expenses as needed. Retainer was applied to an invoice dated 6/13/18.

December 4, 2018	3 hours	Record Review	\$1500
December 5, 2018	3 hours	Record Review	\$1500
December 5, 2018	1.5 hours	Bruce Alverson- Meeting	\$750
December 15, 2018	1 hour	Record Review	\$500
December 15, 2018	1 hour	Attorney Conference Call	\$500
December 17, 2018	2 hours	Record Review	\$1000
December 18, 2018	Full day	Trial	\$8000
December 17-18, 18		<u>Travel expenses</u>	
		Tickets for wed 12/19	\$275
		Tickets for tues 12/18	\$190
		Hotel 12/17	\$95
			\$560
		Total Invoice →	\$14,310

Please make checks payable to Clifford Segil, D.O.
Clifford Segil, D.O.
2001 Santa Monica Blvd - Suite 1170W
Santa Monica, CA 90404

Ramparts 1/2
Share:
\$7,155.00

Thank you for allowing me to participate in the defense of your client.

Very truly yours,
Clifford Segil, D.O.
Neurologist

Clifford Segil, D.O.

CS / 12/20/2018 6:46:37 AM

2001 Santa Monica Blvd - Suite 1170W - Santa Monica, CA 90404
Office (310) 828 - 8838 Fax (310) 828 - 2099

www.cliffordsegil.com
Page 1 of 1

Tamm
23646

Service Charges



PHONE (213) 249-9999

INVOICE

Invoice No.	Customer No.
0000007426	210055
INVOICE DATE	Total Due
11/30/2018	\$ 340.00

PLEASE MAKE REMITTANCE TO:

Lincoln, Gustafson & Cercos LLP
 3960 Howard Hughes Parkway, Suite 200
 Las Vegas, NV 89169
 T (702) 257-1997

Nationwide Legal, LLC
 1609 James M Wood Blvd
 Los Angeles, CA 90015
 TAX ID # 20-8284527

Customer No.	Invoice No.	Period Ending	Amount Due	Page
210055	0000007426	11/30/2018	\$ 340.00	4

Date	Order No.	Service Detail	Charges	Total
11/28/2018 <small>INV. STANDARD PROCESS - JK</small>	NV158167	LINCOLN, GUSTAFSON & CERCOS LLP 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 Caller: Barbara Privett Case Title: VIVIA HARRISON, an individual, Docs: Please serve Trial Subpoena, letter and witness fee check on Jessica Archley. Please have Jessica Archley (Sica) 4080 Paradise Road Las Vegas, NV 89169 Case Number: A-16-732342-C Client/Matter: Harrison	Base Charge : Total:	\$ 55.00 \$ 55.00
11/28/2018 <small>INV. STANDARD PROCESS - JK</small>	NV158170	LINCOLN, GUSTAFSON & CERCOS LLP 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 Caller: Barbara Privett Case Title: VIVIA HARRISON, an individual, Docs: Please serve Trial Subpoena, letter, and witness fee check on Nicolas Sanchez. Please hav	Base Charge : Total:	\$ 55.00 \$ 55.00
12/5/2018 <small>INV. STANDARD PROCESS - JK</small>	NV158512	LINCOLN, GUSTAFSON & CERCOS LLP 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 Caller: Barbara Privett Case Title: Vivian Harrison vs. Ramparts, I Docs: Please serve Trial Subpoena, letter, and witness fee check on Melissa Myers. Please have Melissa Myers 2325 Fields Street North Las Vegas, NV 89032 Case Number: A-16-732342-C Client/Matter: Harrison	Total:	\$.00
			Total Charges for Ref. - Harrison:	\$ 110.00

INVOICE PAYMENT DUE UPON RECEIPT

INVOICE

Invoice No.	Customer No.
000000001	210055
INVOICE DATE	Total Due
12/6/2018	\$ 245.00

PLEASE MAKE REMITTANCE TO:

Lincoln, Gustafson & Cercos LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
T (702) 257-1997

Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015
TAX ID # 20-8284527

Customer No.	Invoice No.	Invoice Date	Invoice Due	Page
210055	000000001	12/06/2018	\$ 245.00	1

Date	Order No.	Service Detail	Charges	Total
12/6/2018	NV158579	<p>LINCOLN, GUSTAFSON & CERCOS LLP 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 Caller: Elizabeth Arthur Case Title: Vivie Harrison, an individual Docs: Trial Subpoena, Letter and Check;</p> <p>Barbara Bradley 3325 E Tropicana Avenue, Unit 2027 Las Vegas, NV 89122 Case Number: A-16-733342-C Client/Matter: 16204</p>	<p>Base Charge \$ 55.00</p> <p>16304 Total \$ 55.00</p>	\$ 55.00

INVOICE PAYMENT DUE UPON RECEIPT

Witness Fees

Lincoln, Gustafson & Cercos, LLP

11781

6192 Nicolas Sanchez

11/28/2018

\$25.00

Inv. Date
11-28-2018

Inv. No.
QuickCheck

Invoice Description
Harrison v. Ramparts - Witness Fee

Amount
25.00

PRODUCT 55LB10: USE WITH #1500 ENVELOPE Deluxe Corporation 1-800-328-0304 or www.deluxe.com/shop PRINTED IN U.S.A. Total: A \$25.00

11781

Lincoln, Gustafson & Cercos, LLP 3960 Howard-Hughes Parkway, Suite 20G Las Vegas, Nevada 89169 (702) 257-1997		 94-169/1212	CHECK NO. 11781	11781
<i>Twenty-Five and No/100 Dollars</i>		DATE	AMOUNT	
		11/28/2018	\$25.00	
PAY TO THE ORDER OF Nicolas Sanchez			 AUTHORIZED SIGNATURE	Security Features. Details on back.

⑈011781⑈ ⑆21201694⑆ 153700105478⑈

6194 Melissa Myers

11/29/2018

\$25.00

Inv Date	Inv No	Invoice Description	Amount
11-29-2018	QuickCheck	Harrison v. Ramparts - Witness Fee	25.00

PRODUCT 5SLB101 USE WITH 9" 500 ENVELOPE Deluxe Corporation 1-800-328-0304 www.deluxe.com/shcp PRINTED IN U.S.A. Total: A \$25.00

11783

11783

Lincoln, Gustafson & Cercos, LLP
 3960 Howard Hughes Parkway, Suite 200
 Las Vegas, Nevada 89169
 (702) 257-1997



94-169/1212

CHECK NO. 11783

Twenty-Five and No/100 Dollars-----

DATE

AMOUNT

11/29/2018

\$25.00

PAY TO THE ORDER OF

Melissa Myers
 2325 Fields Street
 North Las Vegas, NV 89032



Barbara J. Dawson
 AUTHORIZED SIGNATURE

Security Features. Details on back.

⑈011783⑈ ⑆21201694⑆ 153700105478⑈

Trial Preparation Charges



HOLO Discovery
 3016 West Charleston Blvd
 Suite 170
 Las Vegas, NV 89102
 702.333.4321

Invoice ✓

NS4

INVOICE	6464
DATE	12/3/2018
TERMS	Net 30
DUE DATE	1/2/2019

BILL TO

Lincoln, Gustafson & Cercos
 3960 Howard Hughes Pkwy #200
 Las Vegas, NV 89169

DEC - 5 2018

ORDERED BY
 Staci Ibarra

CLIENT MATTER
 Harrison v. Ramparts

REP
 Jon

ACTIVITY	QTY	AMOUNT
Description: Make 7 copies of each disc.		0.00
CD Duplication	7	84.00T
DVD Duplication	14	280.00T
Sales Tax		30.03

16-304

ENTERED
 12/10

Project Number- 20868
 Date Delivered 12/03/2018

Total Due	\$394.03
Payments/Credits	\$0.00
Balance Due	\$394.03

Thank you for your business. Please make checks payable to HOLO Discovery.
 Tax ID: 81-2158838



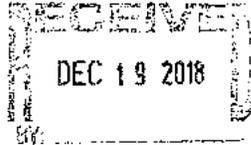
HOLO Discovery
 3016 West Charleston Blvd
 Suite 170
 Las Vegas, NV 89102
 702.333.4321

Tum
Invoice

INVOICE #	6465
DATE	12/3/2018
TERMS	Net 30
DUE DATE	1/2/2019

BILL TO

Lincoln, Gustafson & Cercos
 3960 Howard Hughes Pkwy #200
 Las Vegas, NV 89169



ORDERED BY
 Staci Ibarra

CLIENT MATTER
 Harrison v. Ramparts

REP
 Jon

ACTIVITY	QTY	AMOUNT
Description: Print documents, tab and place in binders x8.		0.00
Color Digital Printing	5,872	2,877.28T
Index Tabs	416	145.60T
Safes Tax		249.39

*Ramparts
 16-304*

Submitted 12/20/18

Project Number - 20858
 Date Delivered 11/30/2018

Total Due	\$3,272.27
Payments/Credits	\$0.00
Balance Due	\$3,272.27

Thank you for your business. Please make checks payable to HOLO Discovery.
 Tax ID: 81-2158838

Tum



HOLO Discovery
 3016 West Charleston Blvd
 Suite 170
 Las Vegas, NV 89102
 702.333.4321

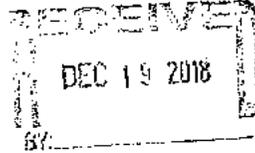
TWM

Invoice



BILL TO

Lincoln, Gustafson & Cercos
 3960 Howard Hughes Pkwy #200
 Las Vegas, NV 89169



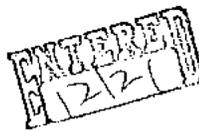
ORDERED BY
 Staci Ibarra

CLIENT MATTER
 Harrison v. Ramparts

REP
 Jon

DESCRIPTION	QTY	UNIT PRICE	TOTAL
Description: Print documents x7.			0.00
Color Digital Printing	2,702		1,323.98T
Index Tabs	35		12.25T
Sales Tax			110.24

*Ramparts
 16-304*



Project Number- 20901
 Date Delivered 12/07/2018

Total Due	\$1,446.47
Payments/Credits	\$0.00
Balance Due	\$1,446.47

Thank you for your business. Please make checks payable to HOLO Discovery.
 Tax ID: 81-2158838

TWM



Jury to Verdict Trial Services
 6440 Sky Pointe Drive
 #140-161
 Las Vegas, NV 89131
 702-375-2538

TUM

Invoice

Date	Invoice #
12/27/2018	2017-2043

Lincoln Gustafson Cercos
 Attn: Barbara Pederson

RECEIVED
 DEC 28 2018

Case	Terms
Harrison v. MGM	Due on receipt

Quantity	Description	Rate	Amount
1.5	11/29/18-Meeting about set up	150.00	225.00
1	12/10/18-Set up courtroom	150.00	150.00
0.5	12/26/18-Tear down courtroom	150.00	75.00
1	VHS tape copies	75.00	75.00

16-304

ENTERED
 12/28

TUM

Thank you for your business.
 brian@jurytoverdict.com

Balance Due **\$525.00**

Hearing Recorder Charges

twm

RECORDER/TRANSCRIBER BILLING INFORMATION

DATE OF INVOICE: 10/03/18

CASE NO:	A-16-732342-C			RECEIVED OCT - 8 2018 BY: _____
CASE NAME:	Vivia Harrison vs. MGM Resorts			
HEARING DATE(S):	09/24/18			
DEPT. NO:	XXIX Melissa Murphy-Delgado 702-671-0889			
ORDERED BY:	Thomas Maroney Esq. (sibarra@igclawoffice.com)			
FIRM NAME:				
PHONE/EMAIL:				
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 (Include case number on check)			
	Mailing Address: Regional Justice Center Fiscal Services Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155		Pay by Phone (credit card): Cashier (702) 671-4507	
BILL AMOUNT:		CDs @ \$25 each =		\$
	1	Hours @ \$40 an hour recording fee		\$40.00
		Pages@	per page of trans.	\$
	Total			\$40.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to: Kennedy Court Reporters Tax Id#			
BILL AMOUNT:	27	pages @	5.01	per page of trans
				\$135.27
DATE PAID:				
	TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED			

TWm
 (0E)

RECORDER/TRANSCRIBER BILLING INFORMATION

DATE OF INVOICE: 11/14/18

16-304

CASE NO:	A-16-732342-C		
CASE NAME:	Vivia Harrison vs. MGM Resorts International		
HEARING DATE(S):	10/12/18		
DEPT. NO:	XXIX Melissa Murphy-Delgado 702-671-0889		
ORDERED BY: FIRM NAME: PHONE/EMAIL:	Thomas Maroney, Esq. (sibarra@hclawoffice.com)		
PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-600028 (Include case number on check) <u>Mailing Address:</u> Regional Justice Center Fiscal Services Attn: Jennifer Garcia 200 Lewis Ave. Las Vegas, NV 89155 <u>Pay by Phone (credit card):</u> Cashier (702) 671-4507		
BILL AMOUNT:		CDs @ \$25 each =	
	2	Hours @ \$40 an hour recording fee	\$80.00
		Pages @	per page of trans. \$
	Total		\$80.00
PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to: Kennedy Court Reporters Tax ID # 95-3817218		
BILL AMOUNT:	127	pages @ 3.80	per page of trans. \$482.60
DATE PAID:			
TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED			

Trial Charges

TWM

RECORDER/TRANSCRIBER BILLING INFORMATION

DATE OF INVOICE: 12/24/18

CASE NO:	A-16-732342-C
CASE NAME:	Vivia Harrison vs. MGM Resorts International
HEARING DATE(S):	Jury Trial 12/10/18-12/14/18; 12/17/18-12/20/18
DEPT. NO:	XXIX Melissa Murphy-Delgado 702-671-0889
ORDERED BY: FIRM NAME: PHONE/EMAIL:	Loren Young, Esq. (lyoung@lgclawoffice.com)

RECEIVED
DEC 26 2018

PAYABLE TO:	Make check payable to: Clark County Treasurer County Tax ID#: 88-6000028 (Include case number on check)												
	<table border="0"> <tr> <td><u>Mailing Address:</u></td> <td><u>Pay by Phone (credit card):</u></td> </tr> <tr> <td>Regional Justice Center</td> <td>Cashier</td> </tr> <tr> <td>Fiscal Services</td> <td>(702) 671-4507</td> </tr> <tr> <td>Attn: Jennifer Garcia</td> <td></td> </tr> <tr> <td>200 Lewis Ave.</td> <td></td> </tr> <tr> <td>Las Vegas, NV 89155</td> <td></td> </tr> </table>	<u>Mailing Address:</u>	<u>Pay by Phone (credit card):</u>	Regional Justice Center	Cashier	Fiscal Services	(702) 671-4507	Attn: Jennifer Garcia		200 Lewis Ave.		Las Vegas, NV 89155	
<u>Mailing Address:</u>	<u>Pay by Phone (credit card):</u>												
Regional Justice Center	Cashier												
Fiscal Services	(702) 671-4507												
Attn: Jennifer Garcia													
200 Lewis Ave.													
Las Vegas, NV 89155													

BILL AMOUNT:	7	CDs @ \$25 each =	\$175.00
	45	Hours @ \$40 an hour recording fee	\$600.00
		Pages @	per page of trans. \$
	Total hours divided equally by each party \$1800 /3 = 600		\$775.00

PAYABLE TO OUTSIDE TRANSCRIBER:	Make check payable to:
BILL AMOUNT:	pages @ per page of trans \$

DATE PAID:
TRANSCRIPTS WILL NOT BE FILED OR RELEASED UNTIL PAYMENT IS RECEIVED

ENTERED
12/26

TWM

Miscellaneous Charges

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

October 31, 2016

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 53266

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 9/30/2016

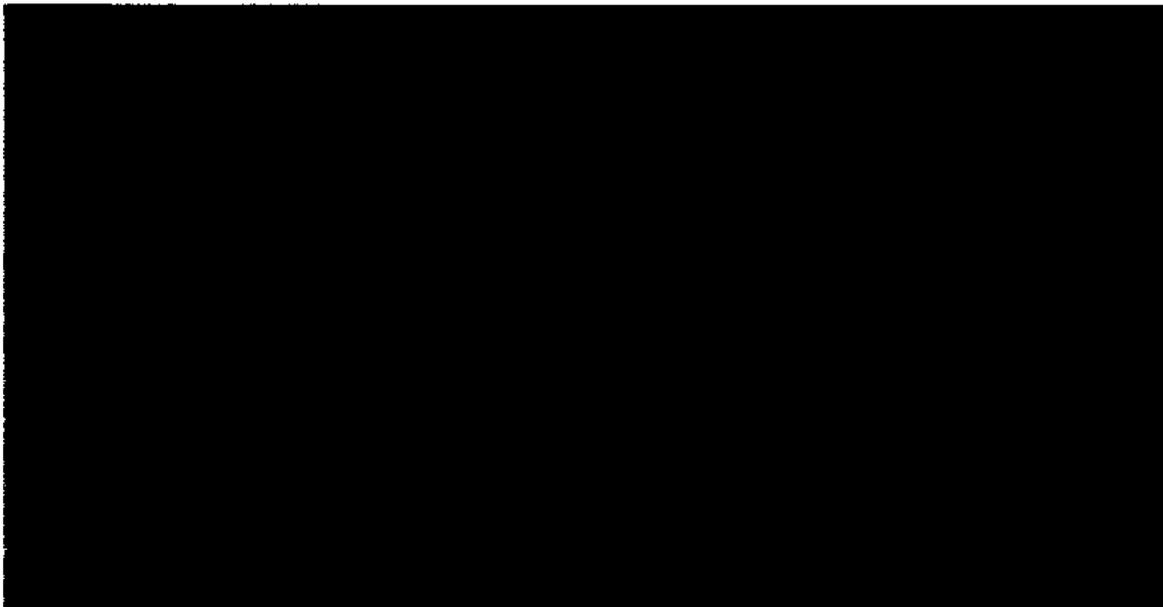

Current Disbursements 4.95




Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 2
October 31, 2016
Invoice 53266



Date	Disbursement Description	Code	Units @ Cost	Amount
09/28/16	Filing Fee; 08/31/16 - Substitution of Attorneys for Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino.			3.50
09/30/16	Photocopies (In-House)		9 @ \$0.000	0.45
09/30/16	Photocopies (In-House)		16 @ \$0.000	0.80
09/30/16	Photocopies (In-House)		4 @ \$0.000	0.20
Total Disbursements				4.95

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

December 21, 2016

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 53574

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 11/30/2016

[REDACTED]

Current Disbursements 440.55

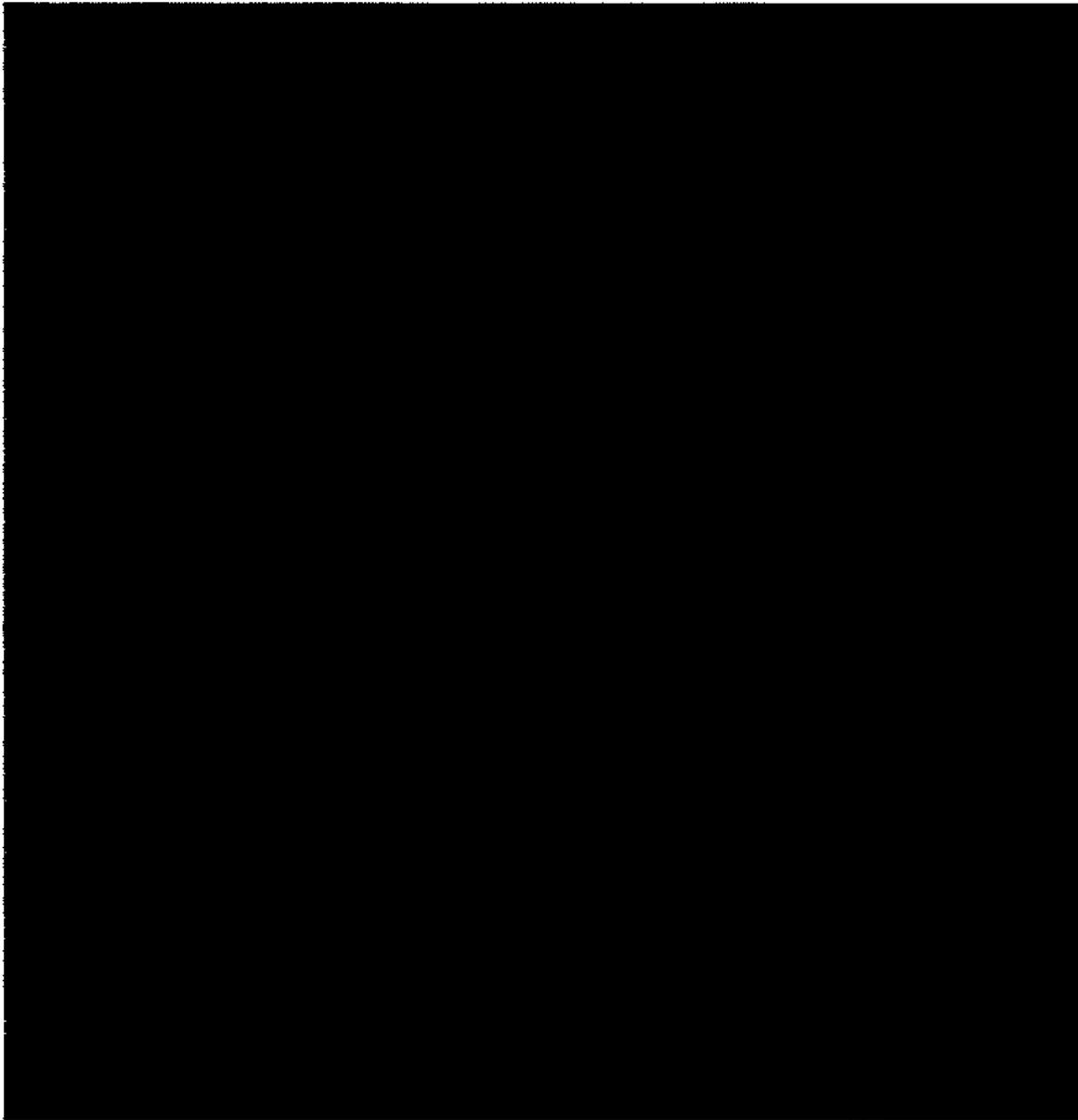
[REDACTED]

[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 2
December 21, 2016
Invoice 53574



Date	Disbursement Description	Code	Units @ Cost	Amount
10/31/16	Photocopies (In-House)		3351 \$0.000	167.55
10/31/16	Photocopies (In-House)		4 @ \$0.000	0.20
11/30/16	Color Photocopies (In-House)		69 @ \$0.000	69.00
11/30/16	Photocopies (In-House)		3565 \$0.000	178.25

Lincoln, Gustafson & Cercos

MGM Administration Building				Page 3
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino				December 21, 2016
I.D. 1863-16304 - RDG				Invoice 53574

Date	Disbursement Description	Code	Units @ Cost	Amount
11/30/16	Photocopies (In-House)		511 @ \$0.000	25.55
			Total Disbursements	440.55

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax ID #33-0224185

February 28, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 54160

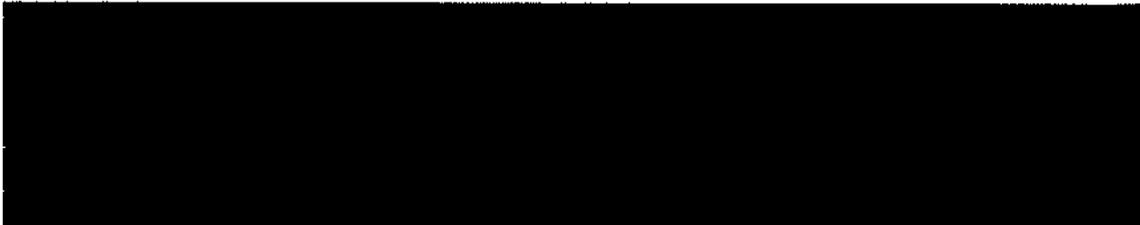
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 1/31/2017



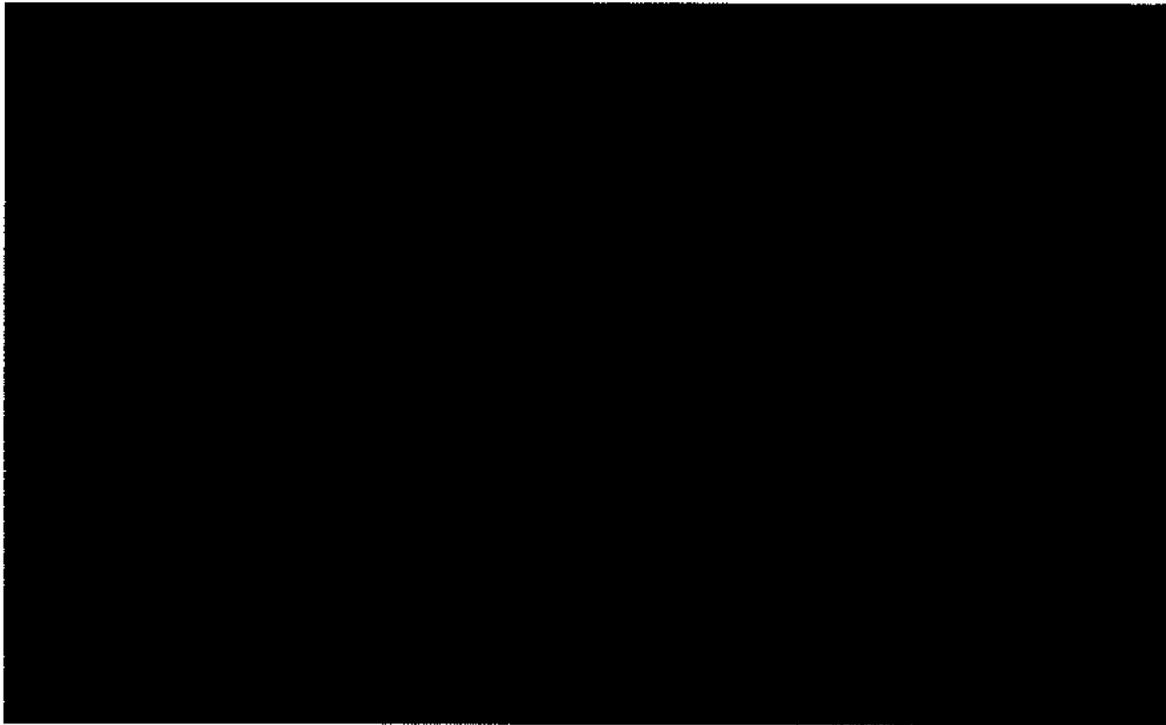
Current Disbursements	11.20
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
February 28, 2017
Invoice 54160



Date	Disbursement Description	Code	Units @ Cost	Amount
12/31/16	Photocopies (In-House)		86 @ \$0.000	4.30
12/31/16	Photocopies (In-House)		23 @ \$0.000	1.15
01/31/17	Photocopies (In-House)		88 @ \$0.000	4.40
01/31/17	Photocopies (In-House)		27 @ \$0.000	1.35
Total Disbursements				11.20

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

March 31, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 54412

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 2/28/2017

[REDACTED]

Current Disbursements 234.80

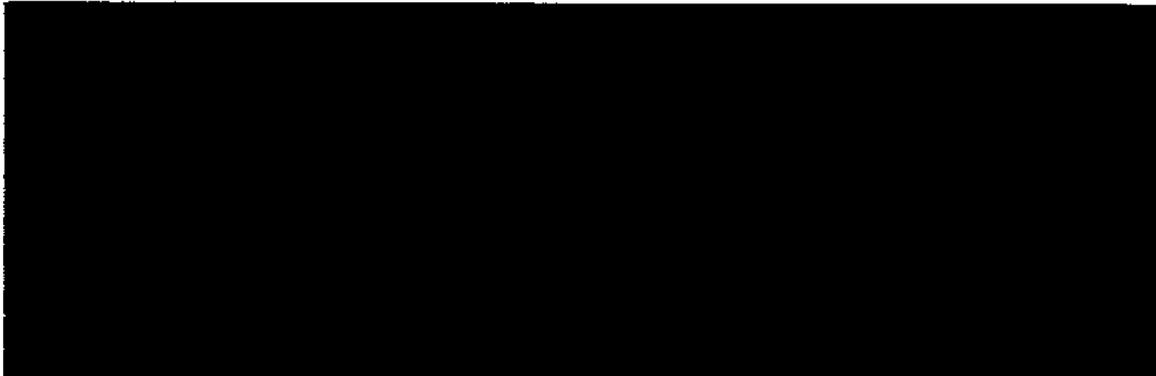
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[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 7
March 31, 2017
Invoice 54412



Date	Disbursement Description	Code	Units @ Cost	Amount
02/16/17	VHS Conversions; Litigation Services and Technologies of Nevada, LLC			230.00
02/28/17	Photocopies (In-House)		2 @ \$0.000	0.10
02/28/17	Photocopies (In-House)		48 @ \$0.000	2.40
02/28/17	Photocopies (In-House)		46 @ \$0.000	2.30
Total Disbursements				234.80

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

April 30, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 54643

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 3/31/2017

[REDACTED]

Current Disbursements 5.25

[REDACTED]

[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
April 30, 2017
Invoice 54643



Date	Disbursement Description	Code	Units @ Cost	Amount
03/31/17	Photocopies (In-House)	E101	60 @ \$0.000	3.00
03/31/17	Photocopies (In-House)	E101	45 @ \$0.000	2.25
Total Disbursements				5.25

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

May 31, 2017

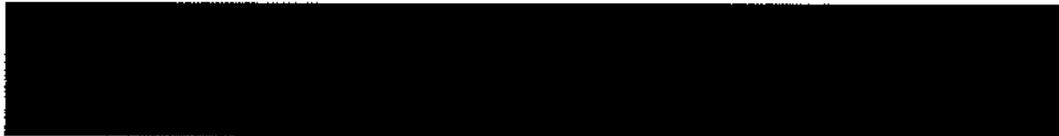
MGM Administration Bulding
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 54813

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 4/30/2017



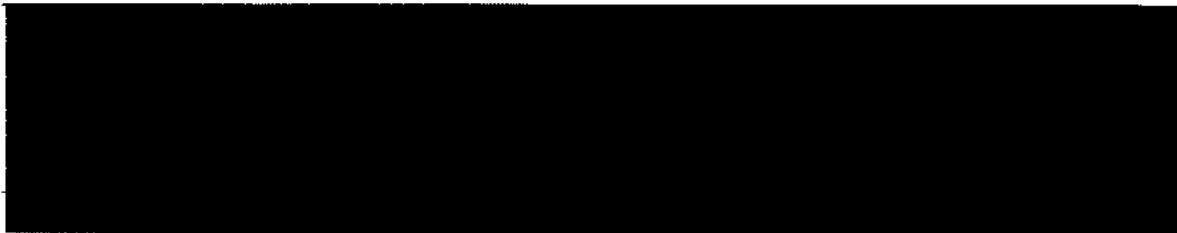
Current Disbursements 10.40



Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
May 31, 2017
Invoice 54813



Date	Disbursement Description	Code	Units @ Cost	Amount
04/30/17	Photocopies (In-House)	E101	191 @ \$0.000	9.55
04/30/17	Photocopies (In-House);	E101	17 @ \$0.000	0.85
Total Disbursements				10.40

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

June 30, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 55076

Re: Harrison, Vivian v. Ramparts, Inc. dba Luxor Hotel & Casino

ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 5/31/2017

[REDACTED]

Current Disbursements	2,620.46
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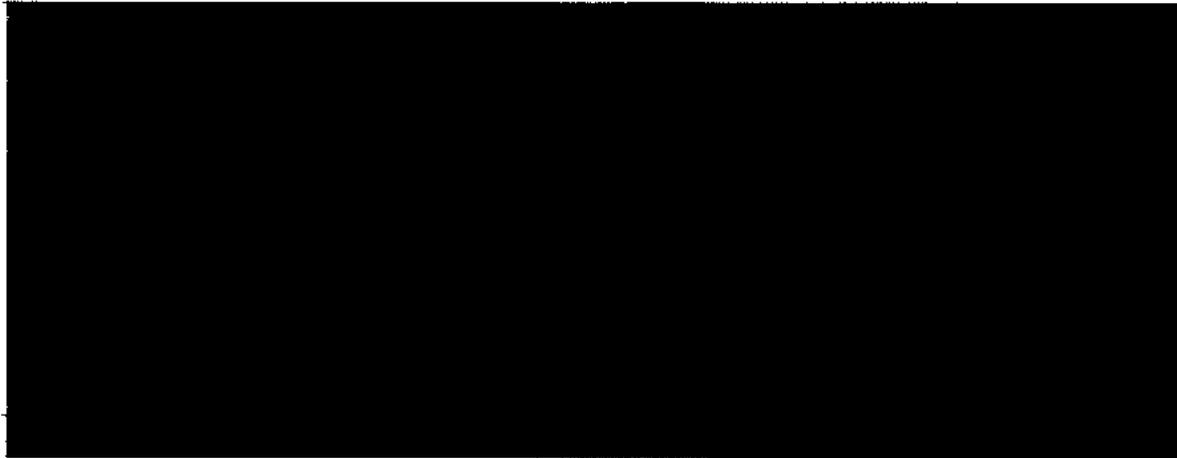
[REDACTED]

[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 5
June 30, 2017
Invoice 55076



Date	Disbursement Description	Code	Units @ Cost	Amount
05/05/17	Court Reporter; Depo of Vivia Harrison ; All American Court Reporters	E115		383.50
05/05/17	Court Reporter; Depo of Stan Sawamoto ; All American Court Reporters	E115		353.25
05/08/17	Travel Expense; Airfare/Birmingham, AL [4-12-17]; U.S. Bank	E110		1,293.96
05/08/17	Travel Expense; Meals/Fultondale, AL [4-12-17]; U.S. Bank	E110		44.76
05/08/17	Travel Expense; Rental Car & Gas/Birmingham, AL [4-12-17]; U.S. Bank	E110		182.04
05/08/17	Travel Expense; Lodging/Fultondale, AL [4-12-17]; U.S. Bank	E110		291.60
05/08/17	Travel Expense; Parking/Fultondale, AL [4-14-17]; U.S. Bank	E110		59.00
05/31/17	Photocopies (In-House)	E101	107 @ \$0.000	5.35
05/31/17	Photocopies (In-House)	E101	70 @ \$0.000	3.50
05/31/17	Photocopies (In-House)	E101	70 @ \$0.000	3.50
Total Disbursements				2,620.46

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

July 25, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 55130

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 6/30/2017

[REDACTED]

Current Disbursements 25.35

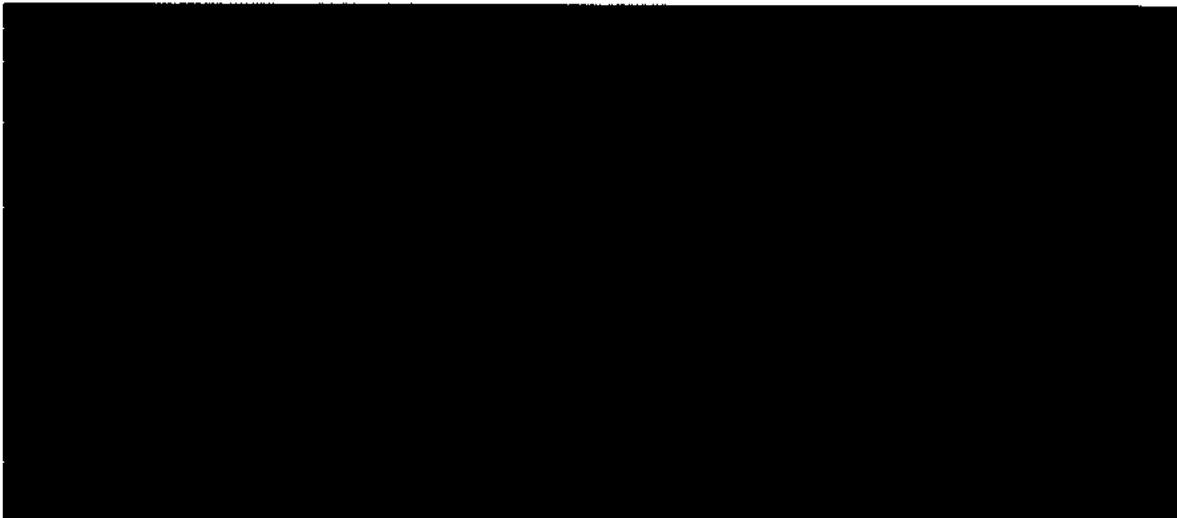
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 5
July 25, 2017
Invoice 55130



Date	Disbursement Description	Code	Units @ Cost	Amount
06/30/17	Filing Fee; 06/13/17 - Defendant Ramparts, Inc. dba Luxor Hotel Casino's Response to Plaintiff's Opposition to Defendant Pride Mobility Products Corp.'s Motion for Summary Judgment.			3.50
06/30/17	Photocopies (In-House)		199 @ \$0.000	9.95
06/30/17	Photocopies (In-House)		238 @ \$0.000	11.90
Total Disbursements				25.35

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
TaxID. #33-0224185

August 31, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 55450

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 7/31/2017

[REDACTED]

Current Disbursements	7.40
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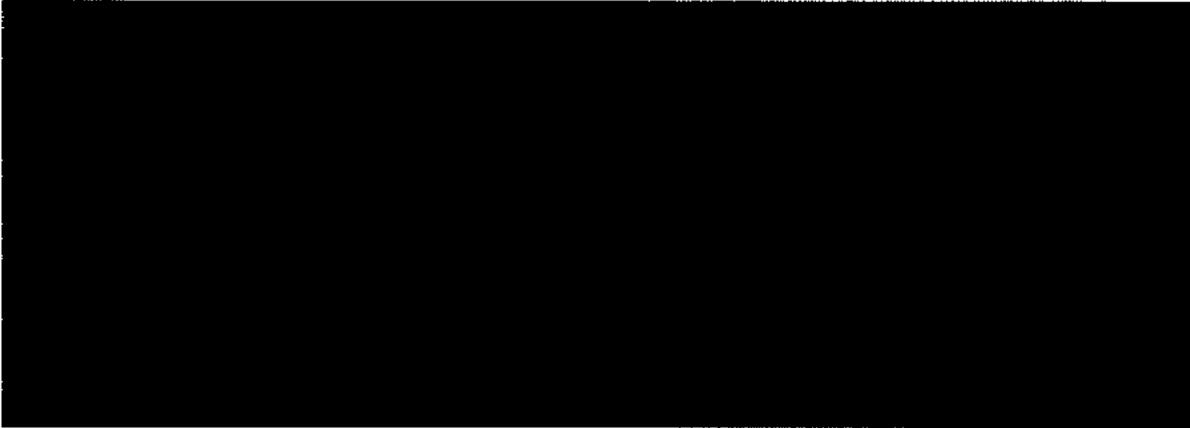
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[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 5
August 31, 2017
Invoice 55450



Date	Disbursement Description	Code	Units @ Cost	Amount
07/31/17	Photocopies (In-House)		39 @ \$0.000	1.95
07/31/17	Photocopies (In-House)		109 @ \$0.000	5.45
Total Disbursements				7.40

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

September 18, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 55568

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

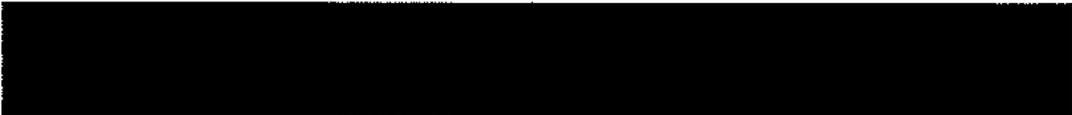
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 8/31/2017



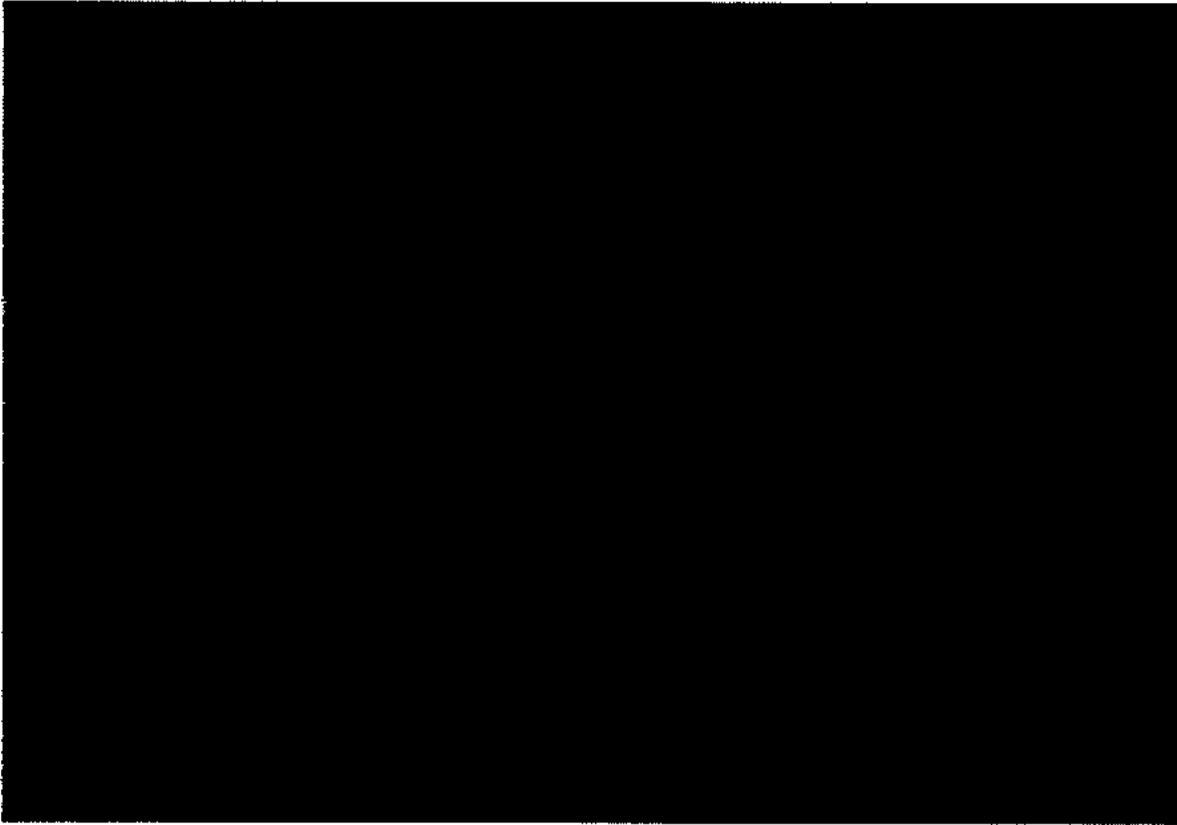
Current Disbursements	133.05
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 3
September 18, 2017
Invoice 55568



Date	Disbursement Description	Code	Units @ Cost	Amount
08/04/17	Parking; Loren Young			5.00
08/31/17	Photocopies (In-House)		515 @ \$0.000	25.75
08/31/17	Color Photocopies (In-House)		91 @ \$0.000	91.00
08/31/17	Photocopies (In-House)		97 @ \$0.000	4.85
08/31/17	Photocopies (In-House)		129 @ \$0.000	6.45
Total Disbursements				133.05

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

October 23, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 55810

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 9/30/2017

[REDACTED]

Current Disbursements 480.00

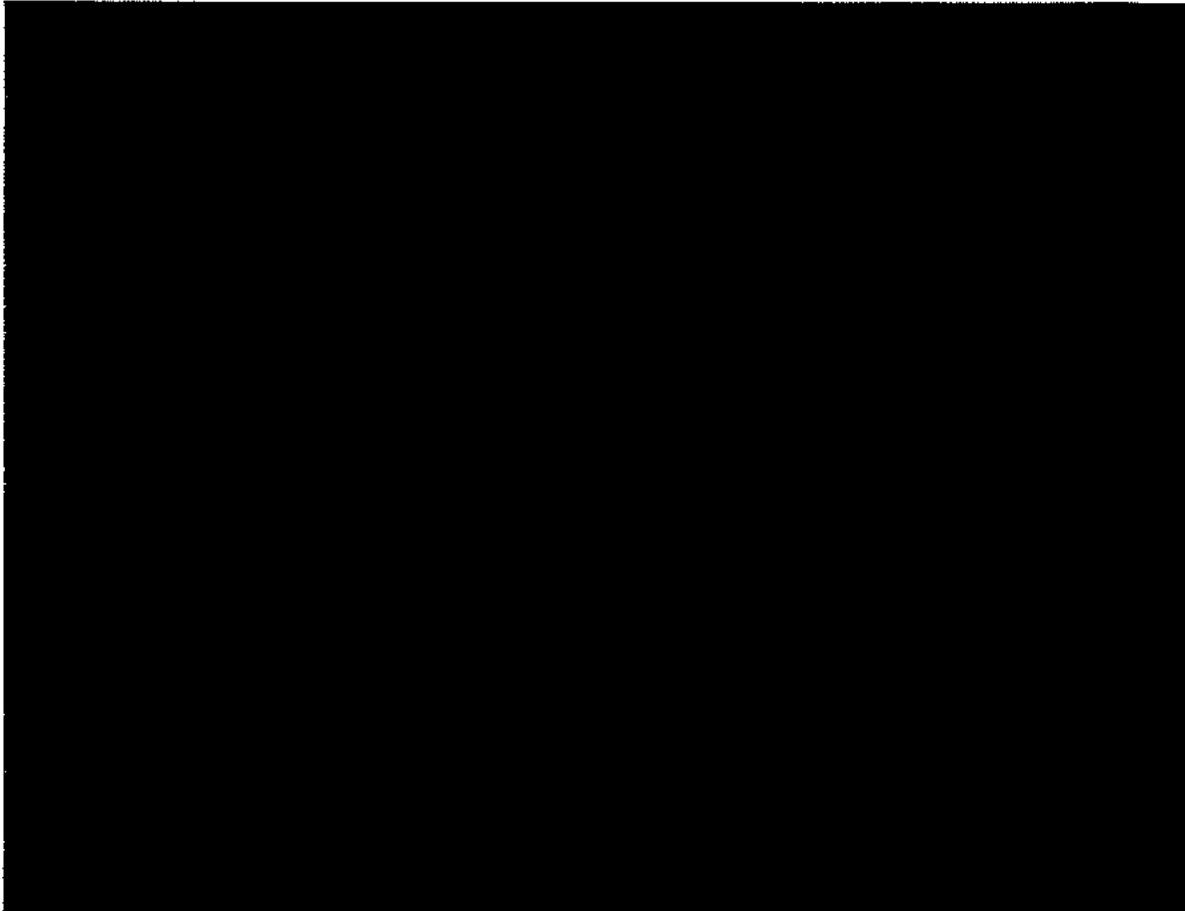
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[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 3
October 23, 2017
Invoice 55810



Date	Disbursement Description	Code	Units @ Cost	Amount
09/08/17	Court Reporter; Rocket Reporters, LLC			480.00
Total Disbursements				480.00

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

November 30, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 56093

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

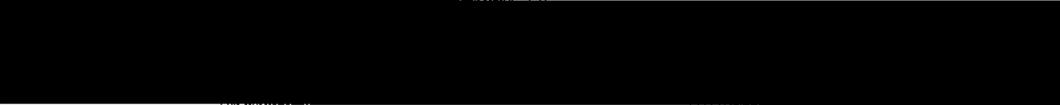
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 10/31/2017



Current Disbursements	3,702.64
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Lincoln, Gustafson & Cercos

MGM Administration Building

Page 4

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

November 30, 2017

I.D. 1863-16304 - RDG

Invoice 56093

Date	Disbursement Description	Code	Units @ Cost	Amount
09/30/17	Photocopies (In-House)		504 @ \$0.000	25.20
09/30/17	Photocopies (In-House)		17 @ \$0.000	0.85
09/30/17	Color Photocopies (In-House)		73 @ \$0.000	73.00
09/30/17	Photocopies (In-House)		31 @ \$0.000	1.55
10/04/17	Travel Expense; Airfare/NV to FL [9-25-17/9-29-17]; U.S. Bank			1,347.14
10/30/17	Court Reporter; Depositions of Rebecca Charles and Chuck Denmark ; Advanced Depositions			1,369.40
10/30/17	Court Reporter; Deposition of Diane Lucas ; Advanced Depositions			853.90
10/31/17	Photocopies (In-House)		571 @ \$0.000	28.55
10/31/17	Photocopies (In-House)		61 @ \$0.000	3.05
Total Disbursements				3,702.64

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

December 27, 2017

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 56378

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 11/30/2017

[REDACTED]

Current Disbursements 883.75

[REDACTED]

[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building	Page 3
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino	December 27, 2017
I.D. 1863-16304 - RDG	Invoice 56378

Date	Description of Services	Atty	Hours Code	Amount
Total Fees				2,942.00
Date	Disbursement Description	Code	Units @ Cost	Amount
11/03/17	Travel Expense; Meals/Jacksonville, FL [9-25-17]; U.S. Bank			58.59
11/03/17	Travel Expense; Rental Car & Gas/Jacksonville, FL [9-25-17]; U.S. Bank			94.61
11/03/17	Travel Expense; Lodging/Jacksonville, FL [9-25-17]; U.S. Bank			285.89
11/03/17	Travel Expense; Lodging/Dania Beach, FL [9-27-17]; U.S. Bank			259.74
11/03/17	Travel Expense; Meals/Fort Lauderdale, FL [9-27-17]; U.S. Bank			35.41
11/03/17	Travel Expense; Rental Car & Gas/Fort Lauderdale, FL [9-27-17]; U.S. Bank			101.11
11/03/17	Outside Photocopies; Suwannee Graphics [9-26-17]; U.S. Bank			26.75
11/30/17	Photocopies (In-House)		251 @ \$0.000	12.55
11/30/17	Photocopies (In-House)		137 @ \$0.000	6.85
11/30/17	Photocopies (In-House)		45 @ \$0.000	2.25
Total Disbursements				883.75

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

January 25, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 56511

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 12/31/2017

[REDACTED]

Current Disbursements 663.55

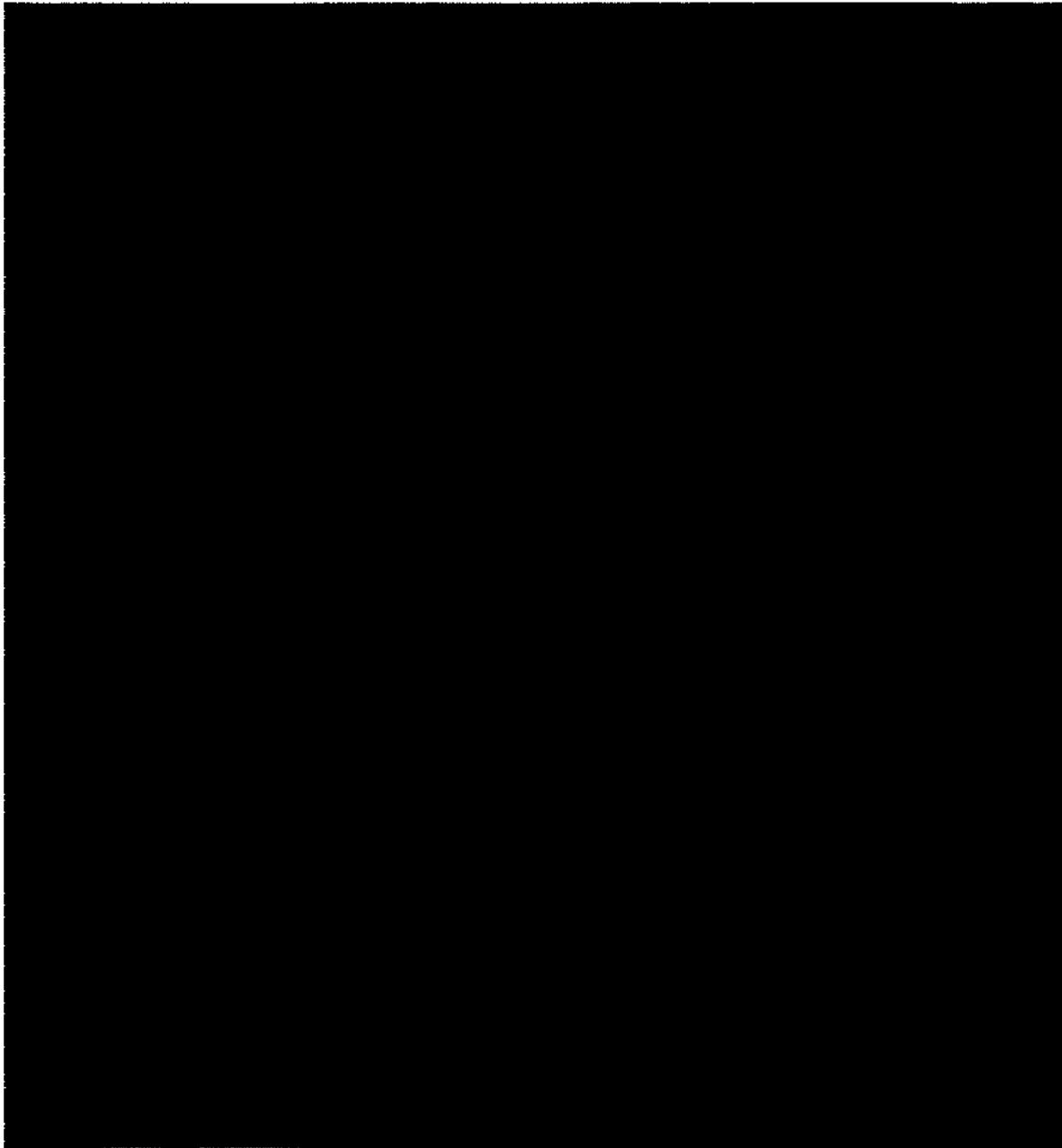
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
L.D. 1863-16304 - RDG

Page 2
January 25, 2018
Invoice 56511



Date	Disbursement Description	Code	Units @ Cost	Amount
12/06/17	Parking; Parking at inspection of Deli on[10-24-17; U.S. Bank			5.00
12/19/17	Court Reporter; Deposition of Brian Richard Schultz; Depo			646.80

Lincoln, Gustafson & Cercos

MGM Administration Building

Page 3

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

January 25, 2018

I.D. 1863-16304 - RDG

Invoice 56511

Date	Disbursement Description	Code	Units @ Cost	Amount
	International, LLC			
12/31/17	Photocopies (In-House)		9 @ \$0.000	0.45
12/31/17	Photocopies (In-House)		12 @ \$0.000	0.60
12/31/17	Photocopies (In-House)		14 @ \$0.000	0.70
12/31/17	Color Photocopies (In-House)		10 @ \$0.000	10.00
Total Disbursements				663.55

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

February 27, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 56789

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 1/31/2018

[REDACTED]

Current Disbursements	992.48
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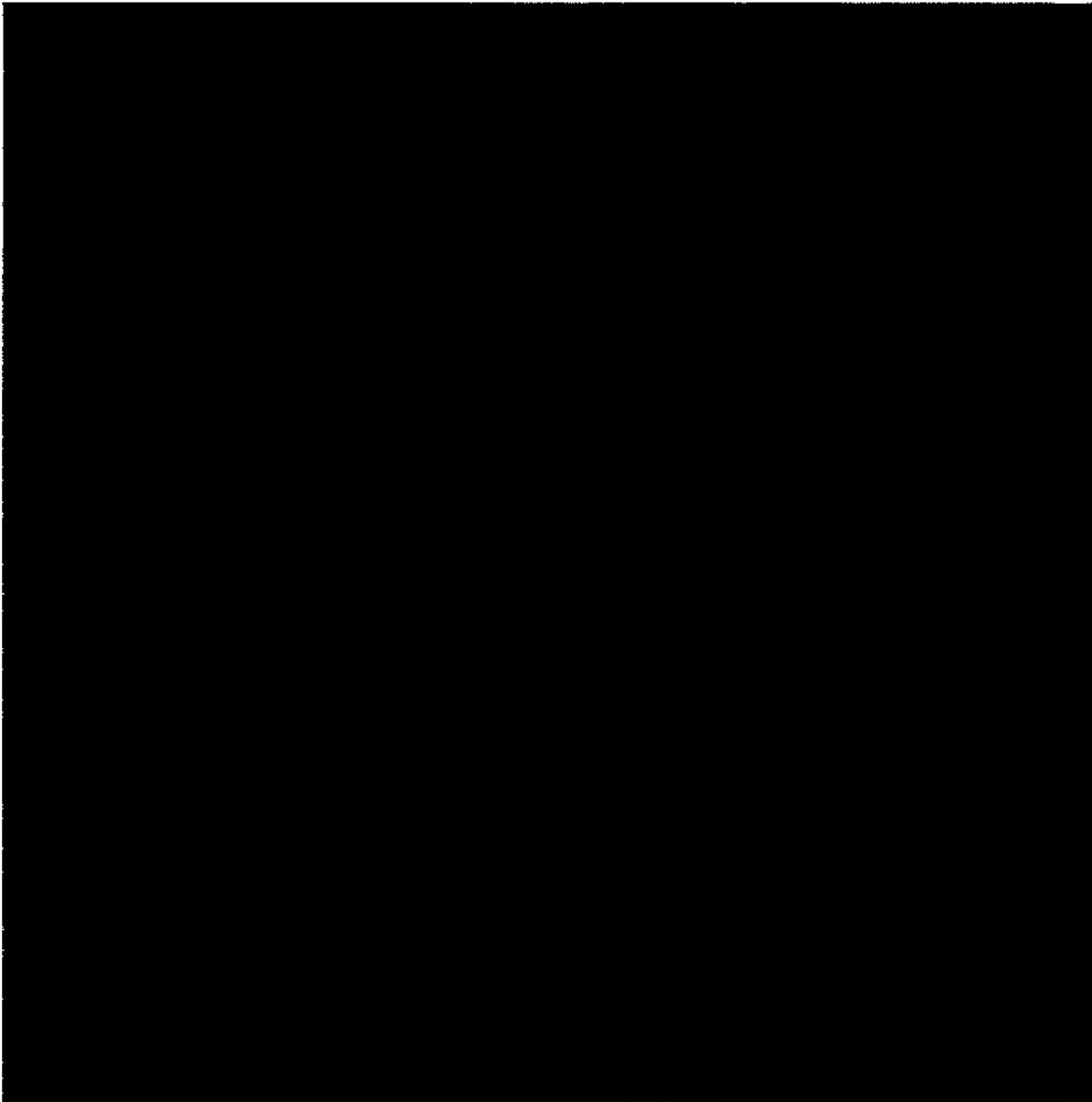
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 2
February 27, 2018
Invoice 56789



Date	Disbursement Description	Code	Units @ Cost	Amount
01/05/18	Parking; Parking [12-15-17]-Client meeting at Luxor; U.S. Bank			8.00
01/05/18	Parking; Parking [12-19-17]-Pre-Deposition meeting at Luxor.; U.S. Bank			5.00

Lincoln, Gustafson & Cercos

MGM Administration Building

Page 3

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

February 27, 2018

I.D. 1863-16304 - RDG

Invoice 56789

Date	Disbursement Description	Code	Units @ Cost	Amount
01/09/18	Court Reporter; Depo of Kimberly Digiacomio; Evolve Depositions			335.84
01/09/18	Court Reporter; Depo of Steven Petersen; Evolve Depositions			310.95
01/09/18	Court Reporter; Depo of Lyndsi Stull ; Evolve Depositions			317.89
01/31/18	Photocopies (In-House)		296 @ \$0.000	14.80
Total Disbursements				992.48

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1160
Tax I.D. #33-0224185

March 28, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 56949

Re: Harrison, Vivian v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 2/28/2018

[REDACTED]

Current Disbursements	1,135.68
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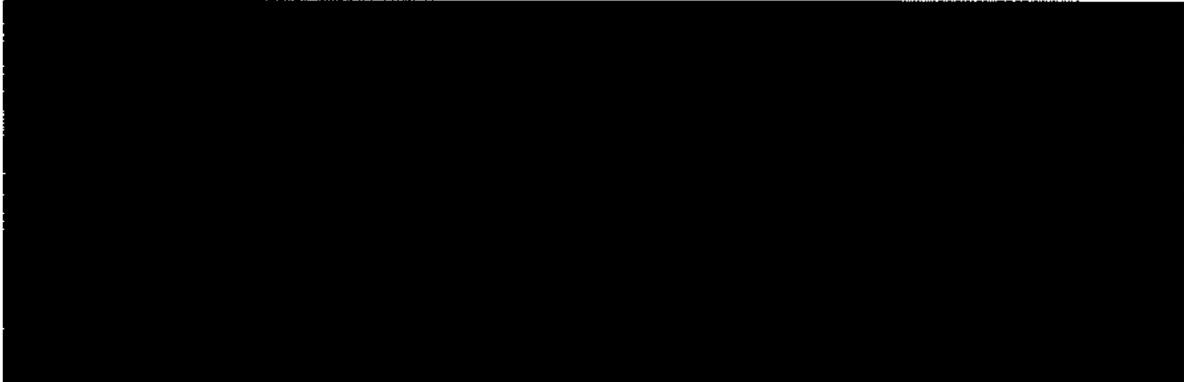
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 2
March 28, 2018
Invoice 56949



Date	Disbursement Description	Code	Units @ Cost	Amount
02/08/18	Court Reporter; Deposition of Michael Zablocky ; Evolve Depositions			655.88
02/26/18	Expert Fee; Madsen, Kneppers & Associates, Inc.			478.50
02/28/18	Photocopies (In-House)		26 @ \$0.000	1.30
Total Disbursements				1,135.68

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

July 26, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 57834

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 6/30/2018

[REDACTED]

Current Disbursements 2,794.70

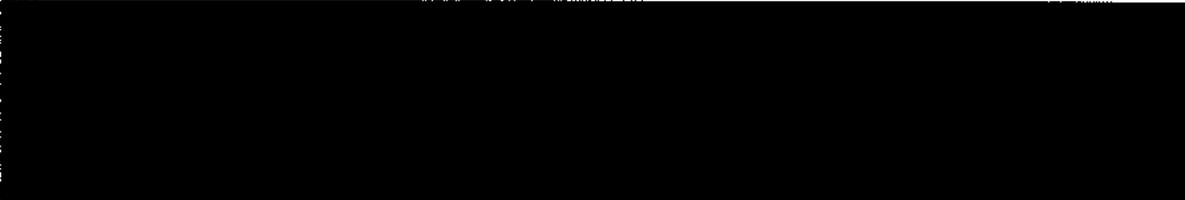
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
July 26, 2018
Invoice 57834



Date	Disbursement Description	Code	Units @ Cost	Amount
06/25/18	Expert Fee; Pre-approved by Will Martin, MGM General Counsel ; Madsen, Kneppers & Associates, Inc.			1,495.90
06/29/18	Expert Fee; 1/3 share, Pre-approved by Will Martin, MGM General Counsel; Vocational Diagnostics Inc.			1,298.80
Total Disbursements				2,794.70

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

August 30, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 58050

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 7/31/2018



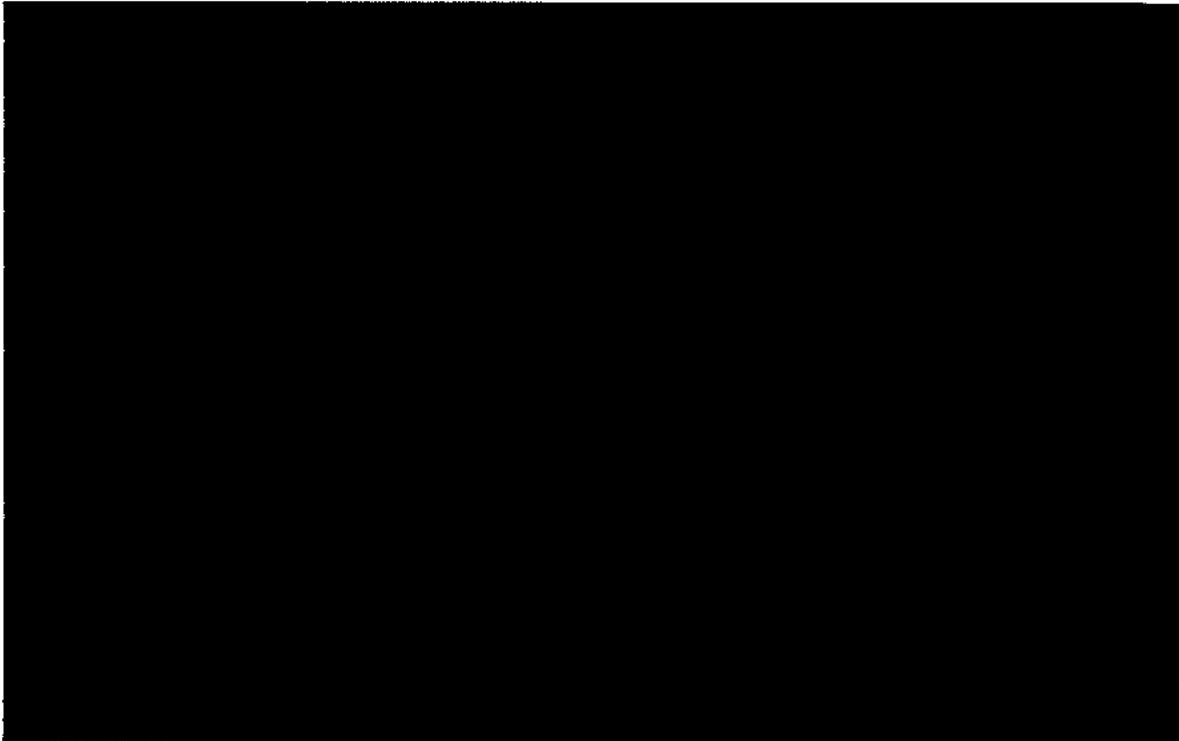
Current Disbursements	842.82
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 3
August 30, 2018
Invoice 58050



Date	Disbursement Description	Code	Units @ Cost	Amount
07/19/18	Travel Expense; Lodging ; Thomas Maroney			233.83
07/19/18	Travel Expense; Rental Car; Thomas Maroney			127.37
07/19/18	Parking; Thomas Maroney			22.00
07/19/18	Travel Expense; Meal ; Thomas Maroney			17.56
07/20/18	Travel Expense; Lodging ; Thomas Maroney			321.47
07/20/18	Travel Expense; Rental Car; Thomas Maroney			120.59
Total Disbursements				842.82

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

September 28, 2018

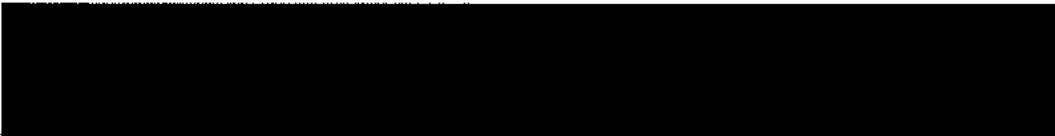
MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 58273

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 8/31/2018



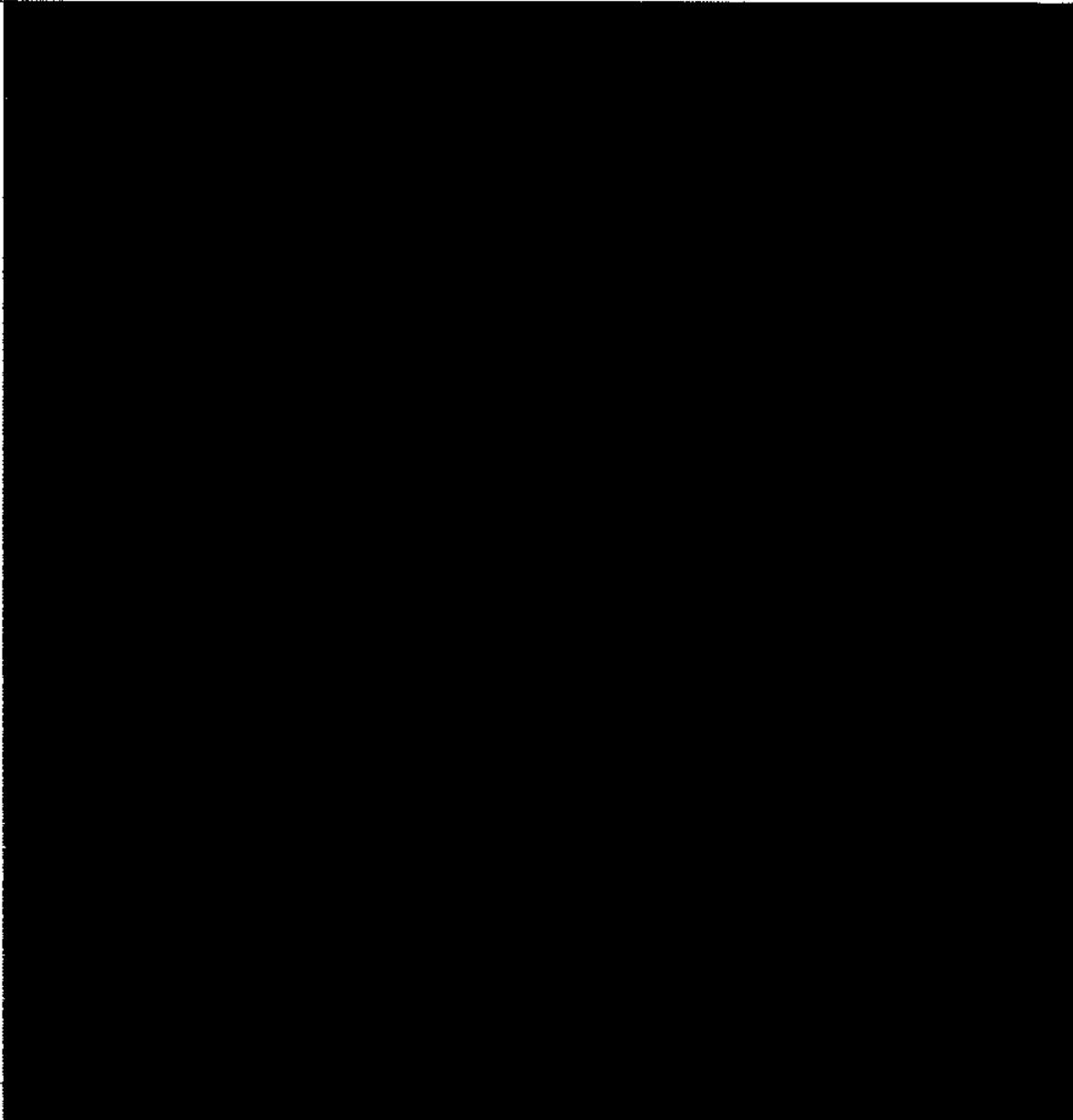
Current Disbursements	2,529.89
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Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
September 28, 2018
Invoice 58273



Date	Disbursement Description	Code	Units @ Cost	Amount
08/07/18	Travel Expense; Airfare/Chicago, IL/Burbank, CA [7/18/18-7/20/18]; U.S. Bank			1,374.04
08/08/18	Court Reporter; Deposition of Timothy M. Hicks, P.E. ;			627.90

Lincoln, Gustafson & Cercos

MGM Administration Building

Page 5

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

September 28, 2018

I.D. 1863-16304 - RDG

Invoice 58273

Date	Disbursement Description	Code	Units @ Cost	Amount
	Esquire Deposition Solutions, LLC			
08/13/18	Court Reporter; Deposition of Michael P. Gibbens ; Esquire Deposition Solutions, LLC			524.45
08/29/18	Court Mandated Electronic Filing; 8/8/18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Limited Reply to Plaintiff's Opposition to Defendant Pride Mobility Products Corp.'s Renewed Motion for Summary Judgment			3.50
Total Disbursements				2,529.89

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

October 29, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 58508

Re: Harrison, Vivian v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 9/30/2018

[REDACTED]

Current Disbursements 220.00

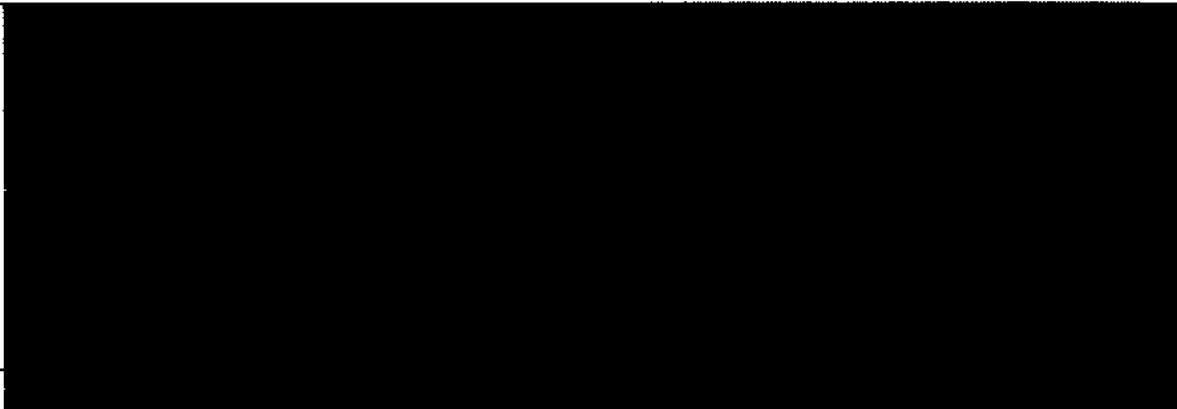
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[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Viva v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 4
October 29, 2018
Invoice 58508



Date	Disbursement Description	Code	Units @ Cost	Amount
09/27/18	Court Mandated Electronic Filing; 08-20-18 - Defendant Ramparts, Inc. d/b/a Luxor Hotel & Casino's Motion for Summary Judgment.	E112		209.50
09/27/18	Court Mandated Electronic Filing; 09-07-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Limited Opposition to Defendant Desert Medical Equipment's Renewed Motion for Summary Judgment.	E112		3.50
09/27/18	Court Mandated Electronic Filing; 09-17-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Reply in Support of its Motion for Summary Judgment.	E112		3.50
09/27/18	Court Mandated Electronic Filing; 09-17-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Joinder to Defendant Desert Medical Equipment's Motion in Limine No. 9 to Exclude Evidence of Past Medical Expenses Not Actually Incurred.	E112		3.50
Total Disbursements				220.00

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

November 29, 2018

MGM Administration Bulding
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 58733

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 10/31/2018

[REDACTED]

Current Disbursements 175.27

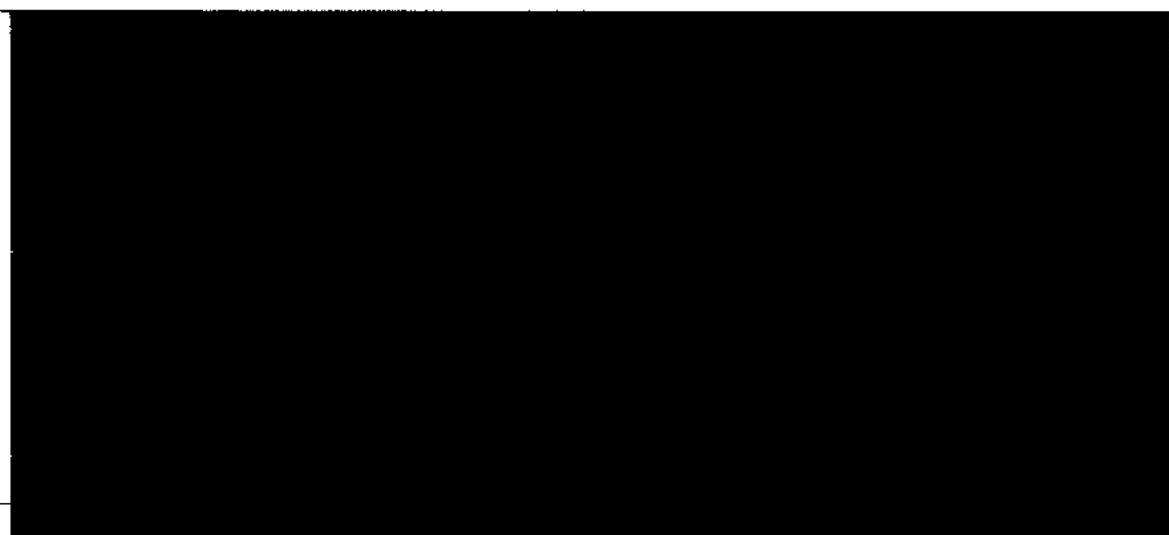
[REDACTED]

[REDACTED]

Lincoln, Gustafson & Cercos

MGM Administration Building
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 5
November 29, 2018
Invoice 58733



Date	Disbursement Description	Code	Units @ Cost	Amount
10/10/18	Recording fee for 9/24/18 hearing ; Clark County Treasurer			40.00
10/10/18	Court Reporter; 9/24/18 Hearing Transcript ; Kennedy Court Reporters			135.27
Total Disbursements				175.27

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

December 27, 2018

MGM Administration Building
Attn: William T. Martin, Esq.
6385 S. Rainbow Blvd., Ste. 500
Las Vegas, NV 89118

Invoice 59003

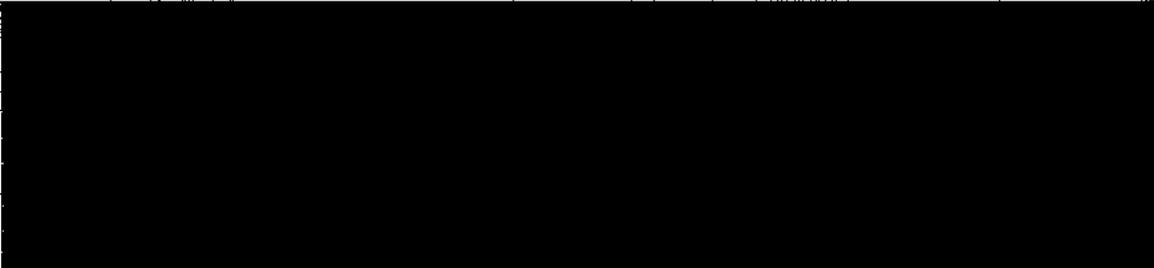
Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino
Claim No: 20140064999LX
Matter ID #: 1307

For Services Rendered Through 11/30/2018



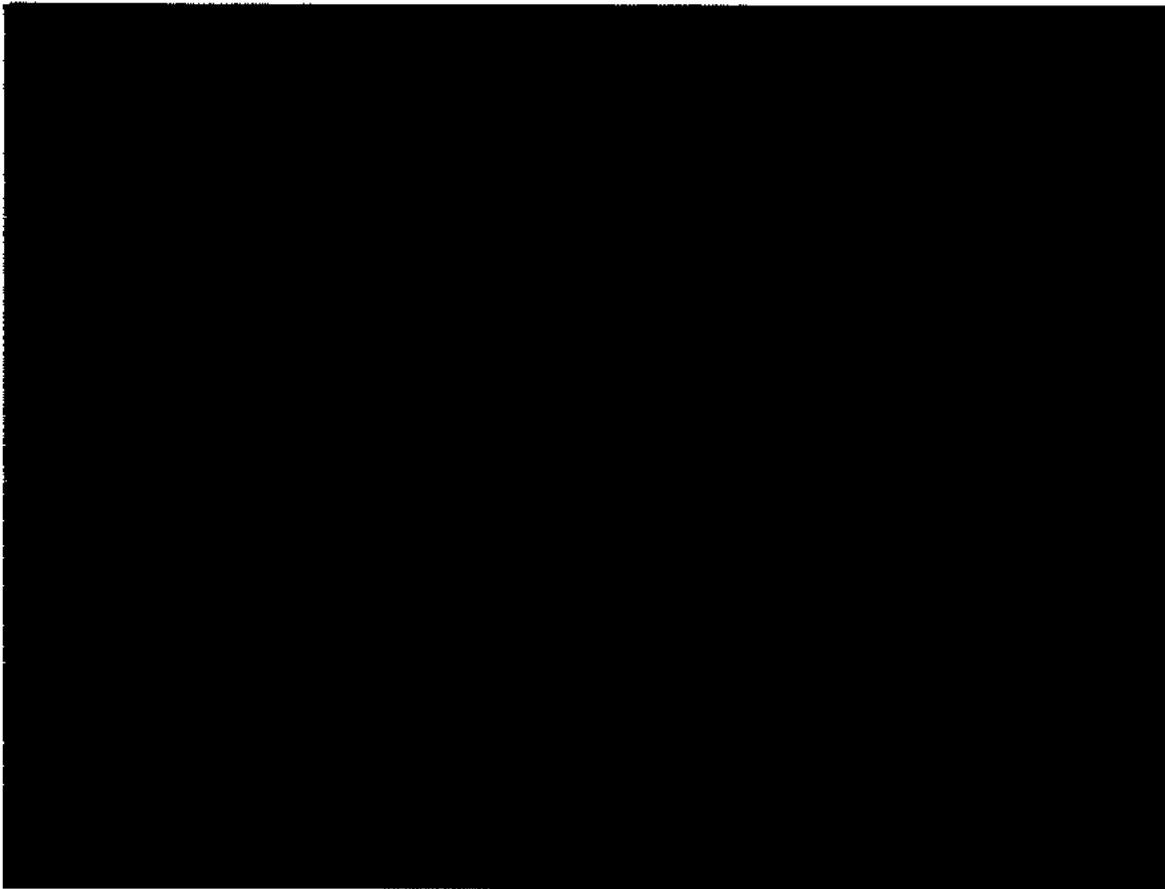
Current Disbursements	623.10
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Lincoln, Gustafson & Cercos

MGM Administration Building
 Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
 I.D. 1863-16304 - RDG

Page 8
 December 27, 2018
 Invoice 59003



Date	Disbursement Description	Code	Units @ Cost	Amount
11/06/18	Court Mandated Electronic Filing: 09-21-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's List of Trial Witnesses and Exhibits Pursuant to NRCP 16.1(a)(3).	E112		3.50
11/06/18	Court Mandated Electronic Filing: 09-24-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Limited Opposition to Plaintiff Vivia Harrison's Motion in Limine No. 1 to Limit Vivia's Testimony to a Reading of Her Deposition Transcript.	E112		3.50
11/06/18	Court Mandated Electronic Filing: 10-05-18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Reply in Support of its Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E. [Motion in Limine No. 1].	E112		3.50
11/14/18	Hearing Recording Fee; Clark County Treasurer	E112		80.00
11/14/18	Court Reporter; Hearing Transcript ; Kennedy Court	E112		482.60

Lincoln, Gustafson & Cercos

MGM Administration Building

Page 9

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

December 27, 2018

L.D. 1863-16304 - RDG

Invoice 59003

Date	Disbursement Description	Code	Units @ Cost	Amount
	Reporters			
11/28/18	Witness Fee; Nicolas Sanchez	E119		25.00
11/28/18	Witness Fee; Jessica Atchley	E119		25.00
11/28/18	Witness Fee; Jessica Atchley	E119		-25.00
11/29/18	Witness Fee; Melissa Myers	E119		25.00
11/30/18	Witness Fee; Barbara Bradley	E119		25.00
11/30/18	Witness Fee; Barbara Bradley	E119		-25.00
Total Disbursements				623.10

LINCOLN, GUSTAFSON & CERCOS

550 West C St
Suite 1400
San Diego, CA 92101

619-233-1150
Tax I.D. #33-0224185

January 5, 2019

Statement

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino

ID: 1863-16304 - RDG

Insured: Ramparts, Inc. dba Luxor Hotel & Casino

Claim No: 20140064999LX

Matter ID #: 1307



Current Disbursements	9,720.26
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Lincoln, Gustafson & Cercos

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
 I.D. 1863-16304 - RDG

Page 13
 January 5, 2019
 Statement

Date	Description of Services	Atty	Hours Code	Amount
Date	Disbursement Description	Code	Units @ Cost	Amount
12/06/18	Service Fee; Attempted service of Trial Subpoena, letter and witness fee on Jessica Atchley, 4080 Paradise Road, Las Vegas, NV; unable to locate ; Nationwide Legal Nevada, LLC	E118		55.00
12/06/18	Service Fee; Service of Trial Subpoena, letter and witness fee on Nicolas Sanchez, 8316 Maplestar Road, Las Vegas, NV ; Nationwide Legal Nevada, LLC	E118		55.00
12/10/18	Duplication of DVDs and CDs for trial. ; Holo Discovery	E124		394.03
12/14/18	Expert Fee; Vocational Diagnostics Inc.	E119		6,298.60
12/17/18	Court Reporter; Transcript of 12/12/18 Opening Statement; Kennedy Court Reporters	E115		80.16
12/21/18	Outside Photocopies; Exhibits for Trial ; Holo Discovery	E102		1,446.47
12/27/18	Court Mandated Electronic Filing; 12/13/18 - Order Granting in Part Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E.	E112		3.50
12/27/18	Court Mandated Electronic Filing; 12/14/18 - Notice of Entry of Order Granting in Part Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Motion in Limine to Preclude the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E., or Alternatively, to Limit the Testimony and Opinions of Plaintiff's Expert, Timothy M. Hicks, P.E.	E112		3.50
12/28/18	Recording fee and CDs of trial ; Clark County Treasurer	E124		775.00
12/28/18	Audiovisual set-up for trial ; Jury to Verdict Trial Services	E124		525.00
01/04/19	Service Fee; Attempted service of Trial Subpoena on Barbara Bradley, 5325 E. Tropicana Avenue, Unit 2027, Las Vegas,	E118		55.00

Lincoln, Gustafson & Cercos

Re: Harrison, Vivia v. Ramparts, Inc. dba Luxor Hotel & Casino
I.D. 1863-16304 - RDG

Page 14
January 5, 2019
Statement

Date	Disbursement Description	Code	Units @ Cost	Amount
01/04/19	NV; unable to locate ; Nationwide Legal Nevada, LLC Attorney Service; Personal service of Subpoena and Notice of Deposition on DJO Global, 9800 Metric Blvd., Austin, TX; Nationwide Legal Nevada, LLC	E118		15.00
01/04/19	Court Mandated Electronic Filing; 11/26/18 - Defendant Ramparts, Inc. dba Luxor Hotel & Casino's Pre-Trial Memorandum.	E112		3.50
01/04/19	Court Mandated Electronic Filing; 12/03/18 - Trial Subpoena.	E112		3.50
01/04/19	Court Mandated Electronic Filing; 12/03/18 - Trial Subpoena and Acceptance of Service of Trial Subpoena.	E112		3.50
01/04/19	Court Mandated Electronic Filing; 12/04/18 - Trial Subpoena.	E112		3.50
Total Disbursements				9,720.26

**NATIONWIDE
LEGAL**

PHONE (213) 249-9999

INVOICE

Invoice No.	Customer No.
0000007601	210055
INVOICE DATE	Total Due
12/15/2018	\$ 245.00

PLEASE MAKE REMITTANCE TO:

Lincoln, Gustafson & Cercos LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
T (702) 257-1997

Nationwide Legal, LLC
1609 James M Wood Blvd
Los Angeles, CA 90015
TAX ID # 20-8284527

Customer No.	Invoice No.	Period Ending	Amount Due	Page
210055	0000007601	12/15/2018	\$ 245.00	2

Date	Order No.	Service Detail	Charges	Total
12/15/2018	NV39011	Party & Pflau 3960 Howard Hughes Parkway Suite 200 Henderson, NV 89052 Caller: Susa Ibarra Case Number: N/A Case Title: Harrison vs. Rampans	Lincoln Gustafson & Cercos LLP 3960 Howard Hughes Parkway Suite 200 Las Vegas, NV 89169 User Charge: \$ 15.00 Client/Matter: Harrison v. Luxor / 16304 Description: Please pick up final exhibit binders from Party & Pflau and return to LGC by 5 pm on 12/4 Harrison v. Luxor / 16304 Total	\$ 15.00

INVOICE PAYMENT DUE UPON RECEIPT

116-304
Harrison v.
Luxor

Photocopies
for depositions

Suzannee Graphics Inc
937 Ohio Ave N
LIVE OAK, FL 32064
386-362-1846
5436845556195963

SALE

MID 6300 Store 0001 Term 0602
REF# 00000004
Batch #: 501 RRN: 726917216685
09/26/17 13:04:43
A/E EXACT BILL: GC W
Trans ID: 367269614831974
APPR CODE: 216240
VISA Manual CP
*****0839 ***

AMOUNT \$26.75

APPROVED

THANK YOU

CUSTOMER COPY

CHARGE SLIP INITIALS TWM

Copies Telephone Postage Other Parking

Date 7/19/18 File # 16-304

File Name Harrison v. Luxor

Amount \$22.00 Entered 7/25/18 bp

Monroe Wells
183 W. Monroe

PDF 7
DATE: 07/19/18
TIME: 02:53 PM

* Original *
Receipt No. 59/1653/211
Ticket - **162839**
LPR =
TAX included 22.00
Credit: 22.00

Trans ID : 395546
Card No. : *****
Card Type: DISCOVER

Entry - 07/19/18 02:41 AM
Valid - 07/19/18 02:53 PM

MGM Resorts Int.
1111 East Harmon Ave
Las Vegas, 89109

LUXOR
Receipt 054550

Short-term parking tkt
LUXOR - No. 079631
07/24/17 13:38
07/24/17 15:24
Period 0d1h47'
(Ust.) \$5.00

Sub Total \$5.00
Ust. \$0.00

Total \$5.00

Payment Received
MGM Luxor
3900 South Las Vegas
boulevard

TPOS-----*24 Oct 17
15:24 CREDITVISA
WIPE C
RD 433694*****2
S9AUTHORISATION
714242REFERENCE
070502PURCHASE

CHARGE SLIP INITIALS LSY

Copies Telephone Postage Other Parking

Date 8/14/17 File # 16-304

File Name Harrison

Amount \$5.00 Entered 9/12/18 bp

MGM Resorts Int.
1111 East Harmon Ave
Las Vegas, 89109

LUXOR
Receipt 064570

Short-term parking tkt
LUXOR - No. 072177
08/04/17 10:26
08/04/17 11:52
Period 0d1h27'
(Ust.) \$5.00

Sub Total \$5.00
Ust. \$0.00

Total \$5.00

Payment Received
Cash \$5.00

All Amounts in USD.
Deliv. Date=Receipt Date

MGM Resorts Int.
111 East Harmon Ave
Las Vegas, 89109

LUXOR
Receipt 015224

Short-term parking tkt
LUXOR - No. 025924
12/15/17 13:02
12/15/17 15:34
Period 0d2h33'
(Ust.) \$8.00

Sub Total \$8.00
Ust. \$0.00

Total \$8.00

Payment Received
CARD *****2859
AUTHORIZATION 715143
PURCHASE USD8.00

APPROVED

All Amounts in USD.
Deliv. Date=Receipt Date

MGM Resorts Int.
111 East Harmon Ave
Las Vegas, 89109

LUXOR
Receipt 025263

Short-term parking tkt
LUXOR - No. 096789
12/19/17 08:37
12/19/17 10:33
Period 0d1h57'
(Ust.) \$5.00

Sub Total \$5.00
Ust. \$0.00

Total \$5.00

Payment Received
CARD *****2859
AUTHORIZATION 219133
PURCHASE USD5.00

APPROVED

All Amounts in USD.
Deliv. Date=Receipt Date

MGM Resorts Int.
1111 East Harmon Ave
Las Vegas, NV 89109

LUXOR
Receipt 064570

Short-term parking tkt
LUXOR - No. 072177
08/04/17 10:26
08/04/17 11:52
Period 0d1h27'
(Ust.) \$5.00

Sub Total \$5.00
Ust. \$0.00

Total \$5.00

Payment Received
Cash \$5.00

All Amounts in USD.
Deliv. Date=Receipt Date

MGM Resorts Int.
111 E. Flamingo Ave
Las Vegas, 89109

NO
CP1 12/06/18 15:59
Receipt 06007

LUXOR

16304

Short-term parking tkt
LUXOR - No. 009360
12/06/18 12:04
12/06/18 15:59
Period 0d3h56' \$8.00

Sub Total \$8.00
Ust. \$0.00

Total \$8.00

Payment Received
CARD *****2859
AUTHORIZATION 716095
PURCHASE USD8.00
APPROVED

11
All Amounts in USD.
Deliv. Date-Receipt Date

Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Thursday, April 6, 2017 3:53 PM
To: Barbara Pederson
Subject: Flight reservation (58RJJ4) | 12APR17 | LAS-BHM | Young/Loren Scott

16-304 Harrison



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Status
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Flight
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Offers
- Hotel
Offers
- Car
Offers

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[✈ Air Itinerary](#)

AIR Confirmation: 58RJJ4

Confirmation Date: 04/6/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
YOUNG/LOREN SCO TT	74929153	5262499566288	Apr 6, 2018	14128

Rapid Rewards points earned are only estimates. Visit your iFlySouthwest, Southwest.com or Rapid Rewards account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Business Select	Departure/Arrival
Wed Apr 12	4565	<input checked="" type="checkbox"/>	Depart LAS VEGAS, NV (LAS) on Southwest Airlines at 11:40 AM Arrive in BIRMINGHAM, AL (BHM) at 5:10 PM Travel Time: 3 hrs, 30 mins Business Select

Date	Flight	Business Select	Departure/Arrival
Fri Apr 14	1680	<input checked="" type="checkbox"/>	Depart BIRMINGHAM, AL (BHM) on Southwest Airlines at 2:40 PM Arrive in LAS VEGAS, NV (LAS) at 4:50 PM Travel Time: 4 hrs, 10 mins Business Select

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- ✓ Earn Rapid Rewards® points
 - ✓ Best rate guarantee
 - ✓ Free cancellations

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- ✓ Earn Rapid Rewards® points
 - ✓ Guaranteed low rates
 - ✓ Free cancellation

[Book a car >](#)

L 30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

L 10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.

i If you do not plan to travel on your flight: In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on the flight. If not, Southwest will cancel your reservation and all funds will be forfeited.

Air Cost: 1,293.96

Fare Rule(s): 5262499566288: NONTRANSFERABLE.

Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

LAS WN BHM588.63KLN WN LAS588 63KLN 1177.26 END ZPLASBHM
XFLAS4.5BHM4.5 AY11.20\$LAS5.60 BHM5.60

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Cost and Payment Summary

X AIR - 58RJJ4

Base Fare	\$1,177.26
Excise Taxes	\$ 88.30
Segment Fee	\$ 8.20
Passenger Facility Charge	\$ 9.00
September 11th Security Fee	\$ 11.20
Total Air Cost	\$1,293.96

Payment Information

Payment Type: Visa XXXXX XXXXX2859
Date: Apr 6 2017
Payment Amount: \$1,293.96

Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Thursday, July 12, 2018 11:05 AM
To: Barbara Pederson
Subject: Flight reservation (O9MF9L) | 18JUL18 | LAS-MDW-BUR | Maroney/Thomas William

Harrison 16-304

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Air itinerary

AIR Confirmation: O9MF9L

Confirmation Date: 07/12/2018

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
MARONEY/THOMAS WILLIAM	20823350450	5261466622206	Jul 12, 2019	10173

Rapid Rewards points earned are only estimates. Visit your MySouthwest (Southwest.com) or Rapid Rewards account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Wed Jul 18	2366	Depart LAS VEGAS, NV (LAS) on Southwest Airlines at 02:20 PM Arrive in CHICAGO (MIDWAY), IL (MDW) at 07:50 PM Travel Time: 5 hrs 30 mins Anytime

Date	Flight	Departure/Arrival
Thu Jul 19	1360	Depart CHICAGO (MIDWAY), IL (MDW) on Southwest Airlines at 05:20 PM Arrive in LAS VEGAS, NV (LAS) at 07:10 PM Anytime
	270	Change planes to Southwest Airlines in LAS VEGAS, NV (LAS) at 08:10 PM Arrive in BURBANK, CA (BUR) at 09:05 PM Travel Time: 1 hr 55 mins Anytime

[Check in for your flight\(s\)](#): 24 hours before your trip on [Southwest.com](#) or your mobile device to secure your boarding position.

You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.



Bags fly free®: First and second checked bags. Weight and size limits apply. One small bag and one personal item are permitted as carryon items, free of charge.



30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

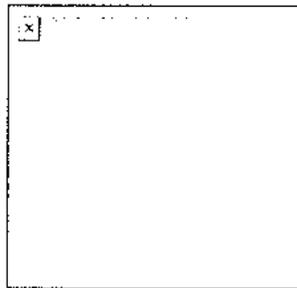
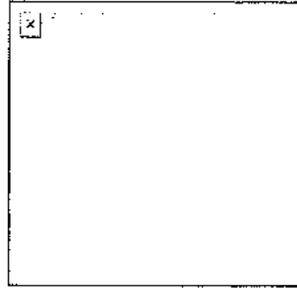
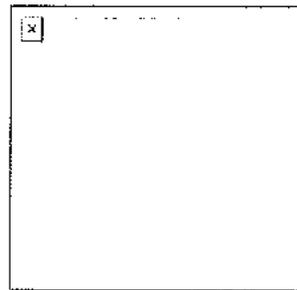


10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.



If you do not plan to travel on your flight: In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on your flight. Customers who fail to cancel reservations for a Wanna Get Away fare segment at least ten (10) minutes prior to travel and who do not board the flight will be considered a no show, and all remaining unused Wanna Get Away funds will be forfeited. All remaining unused Business Select and Anytime funds will be converted to reusable travel funds. If you no show your reward travel reservation, the points will be redeposited to the purchaser's Rapid Rewards account. Any taxes and fees associated with your reward travel reservation will be held for future use in the form of reusable travel funds under the name of the traveler(s).

Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.



Air Cost: 1125.06

Fare Rule(s): 5261466622206: NONTRANSFERABLE -BG WN
Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

LAS WN CHI522.59WN X/LAS WN BUR494.68USD1017.27END ZP
LAS4.10MDW4.10LAS4.10XF LAS4.5MDW4.5

YL
YL
YL



Learn about our boarding process



Learn about inflight WiFi & entertainment

Cost and Payment Summary

PNR: O9MF9L

Base Fare	\$1027.27	Payment Information
U.S. Transportation Tax	\$ 38.29	Payment Type: Visa XXXXXXXXXXXXXXX6915
U.S. 9/11 Security Fee	\$ 11.20	Date: Jul 12, 2018
U.S. Flight Segment Tax	\$ 12.30	Payment Amount: \$1126.06
U.S. Passenger Facility Chg	\$ 9.00	
Total Air Cost	\$1126.06	

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Southwest Airlines is a U.S. Department of Transportation (DOT) certified carrier.

Southwest Airlines is a U.S. Department of Transportation (DOT) certified carrier.

Southwest Airlines is a U.S. Department of Transportation (DOT) certified carrier.

Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Thursday, July 12, 2018 11:08 AM
To: Barbara Pederson
Subject: Flight reservation (O9GX4N) | 20JUL18 | BUR-LAS | Maroney/Thomas William

Harrison 16-304

Southwest

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Check In Online	Check Flight Status	Change Flight	Special Offers	Hotel Offers	Car Offers
-----------------	---------------------	---------------	----------------	--------------	------------

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Air Itinerary

AIR Confirmation: O9GX4N

Confirmation Date: 07/12/2018

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
MARONEY/THOMAS WILLIAM	20823350450	5261466624067	Jul 12, 2019	2175

Rapid Rewards points earned are only estimates. Visit your MySouthwest, Southwest.com or Rapid Rewards account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Fri Jul 20	2215	Depart BURBANK, CA (BUR) on Southwest Airlines at 07:20 PM Arrive in LAS VEGAS, NV (LAS) at 08:25 PM Travel time: 1 hour 5 mins Anytime

- ✓ **Check in for your flight(s):** 24 hours before your trip on [Southwest.com](#) or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.
- 🧳 **Bags fly free®:** First and second checked bags. [Weight and size limits apply.](#) One small bag and one personal item are permitted as [carryon](#) items, free of charge.
- 🕒 **30 minutes before departure:** We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

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⌚ 10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.

i If you do not plan to travel on your flight: In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on your flight. Customers who fail to cancel reservations for a Wanna Get Away fare segment at least ten (10) minutes prior to travel and who do not board the flight will be considered a no show, and all remaining unused Wanna Get Away funds will be forfeited. All remaining unused Business Select and Anytime funds will be converted to reusable travel funds. If you no show your reward travel reservation, the points will be redeposited to the purchaser's Rapid Rewards account. Any taxes and fees associated with your reward travel reservation will be held for future use in the form of reusable travel funds under the name of the traveler(s).

Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 247.98

Fare Rule(s): 5261466624067. NONTRANSFERABLE -BG WN
Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

BUR WN LAS217.47USD217.47END ZP BUR4.10 XF BUR4.5

YL

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Cost and Payment Summary

X AIR - 09GX4N

Base Fare	\$ 217.47
U.S. Transportation Tax	\$ 15.31
U.S. 9/11 Security Fee	\$ 5.60
U.S. Flight Segment Tax	\$ 4.10
U.S. Passenger Facility Charge	\$ 4.50
Total Air Cost	\$ 247.98

Payment Information
Payment Type: Visa XXXXXXXXXXXXX6815
Date: Jul 12, 2018
Payment Amount: \$247.98

Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Friday, September 8, 2017 2:37 PM
To: Barbara Pederson
Subject: Flight reservation (PUJJ82) | 25SEP17 | LAS-JAX | Young/Loren Scott

Thank you for choosing Southwest Airlines for your trip.

Southwest

16304 Harrison

Log in | View my itinerary

Check In Online	Check Flight Status	Change Flight	Special Offers	Hotel Offers	Car Offers
-----------------	---------------------	---------------	----------------	--------------	------------

Ready for takeoff!



Thanks for choosing Southwest® for your trip. You'll find everything you need to know about your reservation below. Happy travels!

Air Itinerary

AIR Confirmation: PUJJ82

Confirmation Date: 09/8/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
YOUNG/LOREN SCO TT	74929153	5268762234511	Sep 8, 2018	5598

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals -- including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Mon Sep 25	1568	Depart LAS VEGAS, NV (LAS) on Southwest Airlines at 07:50 AM Arrive in DENVER, CO (DEN) at 10:40 AM <u>Anytime</u>
	1569	Change planes to Southwest Airlines in DENVER, CO (DEN) at 01:05 PM Arrive in JACKSONVILLE, FL (JAX) at 06:20 PM Travel Time 7 hrs 30 mins <u>Anytime</u>

Check in for your flight(s): 24 hours before your trip on [Southwest.com](#) or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.

Bags fly free®: First and second checked bags. Weight and size limits apply. One small bag and one personal item are permitted as carryon items, free of charge.

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Book a hotel >

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- ✓ Earn Rapid Rewards® points
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- ✓ Free cancellation

Book a car >

⌚ 30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

⌚ 10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.

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Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 624.58

Fare Rule(s): 5268762234511: NONTRANSFERABLE -BG WN
Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

LAS WN X/DEN WN JAX559.80USD559.80END ZP LAS4.10DEN4 10 XF
LAS4.5DEN4.5

 Learn about our boarding process 

 Learn about inflight WiFi & entertainment 

Cost and Payment Summary

 AIR : PUJ382

Base Fare	\$ 559.80	Payment Information
Excise Taxes	\$ 41.98	Payment Type: VisaXXXXXXXXXXXX2859
September 11th Security Fee	\$ 5.60	Date: Sep 6 2017
Segment Fee	\$ 8.20	Payment Amount: 624.58
Passenger Facility Charge	\$ 9.00	
Total Air Cost	\$ 624.58	

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Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Friday, September 8, 2017 2:40 PM
To: Barbara Pederson
Subject: Flight reservation (PU8Z4Q) | 27SEP17 | JAX-FLL | Young/Loren Scott

Tap to view our app on the store on your device.

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- Check In
Online
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Status
- Change
Flight
- Special
Offers
- Hotel
Offers
- Car
Offers

Ready for takeoff!



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Air Itinerary

AIR Confirmation: PU8Z4Q

Confirmation Date: 09/8/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
YOUNG/LOREN SCO TT	74929153	5268762237240	Sep 8, 2018	1338

Rapid Rewards points earned are only estimates. Visit your MySouthwest, Southwest.com or Rapid Rewards account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Wed Sep 27	192	Depart JACKSONVILLE, FL (JAX) on Southwest Airlines at 06:10 AM Arrive in ATLANTA, GA (ATL) at 07:20 AM <u>Anytime</u>
	1223	Change planes to Southwest Airlines in ATLANTA, GA (ATL) at 10:30 AM Arrive in FT. LAUDERDALE, FL (FLL) at 12:20 PM Travel Time 6 hrs, 10 mins. <u>Anytime</u>

Check in for your flight(s): 24 hours before your trip on [Southwest.com](#) or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.

Bags fly free®: First and second checked bags. Weight and size limits apply. One small bag and one personal item are permitted as carryon items, free of charge.

Save up to 30%
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Budget

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L **30 minutes before departure:** We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

L **10 minutes before departure:** You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.

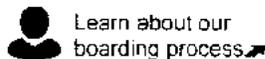
i **If you do not plan to travel on your flight:** In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on your flight. Customers who fail to cancel reservations for a Wanna Get Away fare segment at least ten (10) minutes prior to travel and who do not board the flight will be considered a no show, and all remaining unused Wanna Get Away funds will be forfeited. All remaining unused Business Select and Anytime funds will be converted to reusable travel funds. If you no show your reward travel reservation, the points will be redeposited to the purchaser's Rapid Rewards account. Any taxes and fees associated with your reward travel reservation will be held for future use in the form of reusable travel funds under the name of the traveler(s).

Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 166.58

Fare Rule(s): 5268762237240: NONTRANSFERABLE -BG WN
Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

JAX WN X/ATL WN FLL133.75USD133.75END ZP JAX4.10ATL4.10 XF
JAX4.5ATL4.5



Learn about our boarding process.



Learn about in-flight WiFi & entertainment.

Cost and Payment Summary

X AIR - PU8Z4Q

Base Fare	\$ 133.75
Excise Taxes	\$ 10.03
September 11th Security Fee	\$ 5.60
Segment Fee	\$ 8.20
Passenger Facility Charge	\$ 9.00
Total Air Cost	\$ 166.58

Payment Information

Payment Type: Visa XXXXXXXXXXXXX2859
Date: Sep 8, 2017
Payment Amount: \$166.58

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Barbara Pederson

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Friday, September 8, 2017 2:42 PM
To: Barbara Pederson
Subject: Flight reservation (PUL7KW) | 29SEP17 | FLL-LAS | Young/Loren Scott

View this email in your inbox



16304 Harrison

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- [Check Flight Status](#)
- [Change Flight](#)
- [Special Offers](#)
- [Hotel Offers](#)
- [Car Offers](#)

Ready for takeoff!



Thanks for choosing Southwest® for your trip. You'll find everything you need to know about your reservation below. Happy travels!

Air itinerary

AIR Confirmation: PUL7KW

Confirmation Date: 09/8/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
YOUNG/LOREN SCO TT	74929153	5268762237784	Sep 8, 2018	5040

Rapid Rewards points earned are only estimates. Visit your MySouthwest, Southwest.com or Rapid Rewards account for the most accurate totals, including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Fri Sep 29	1992	Depart FT. LAUDERDALE, FL (FLL) on Southwest Airlines at 07:00 AM Arrive in LAS VEGAS, NV (LAS) at 09:05 AM Travel Time 5 hrs 5 mins Anytime

✓ Check in for your flight(s): 24 hours before your trip on [Southwest.com](#) or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.

🧳 Bags fly free®: First and second checked bags. [Weight and size limits apply](#). One small bag and one personal item are permitted as [carryon](#) items, free of charge.

⌚ 30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.

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dollar.

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- ✓ Guaranteed low rates
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Book a car >

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Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 555.98

Fare Rule(s): 5268762237784: NONTRANSFERABLE -BG WN
Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

FLL WN LAS503.98USD503.98END ZP FLL4.10 XF FLL4.5

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Cost and Payment Summary

 AIR - PUL7KW

Base Fare	\$ 503.98	Payment Information
Excise Taxes	\$ 37.80	Payment Type: Visa XXXXXXXXXXXXX2859
September 11th Security Fee	\$ 5.60	Date: Sep 8 2017
Segment Fee	\$ 4.10	Payment Amount: 555.98
Passenger Facility Charge	\$ 4.50	
Total Air Cost	\$ 555.98	

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RECEIPT

Rental Agreement Number: 105102082
Vehicle Number: 83971812

YOUR INFORMATION

MARONEY, THOMAS
PAYMENT METHOD: DISCOVER XX2164

YOUR RENTAL

Picked up: MDW
Date/Time: JUL 18, 2018@08:56PM
Returned: MDW
Date/Time: JUL 19, 2018@03:50PM
Veh Group: Intermediate SUV
Veh Charged: Intermediate SUV
Vehicle: FORD ESCAPE 4WD
Odometer Out: 9667
Odometer In: 9596
Fuel Reading:

YOUR VEHICLE CHARGES

DY@ 72.00 30.85
MINIMUM CHARGE 72.00
YOUR TIME AND MILEAGE: 72.00

YOUR TAXABLE FEES

**11.11% FEE 9.91
FUEL SERVICE 15.99
VEH LIC RECOUP 1.17/DY 1.17

YOUR SUBTOTAL
TAXABLE SUBTOT 99.07
TAX 21.000% 20.80

YOUR NON TAXABLE ITEMS
CUST FAC CHARGE 4.75/DY 4.75
CITY SURCHARGE 2.75/RN 2.75

TOTAL CHARGES 127.37
NET CHARGES USD 127.37
YOUR TOTAL DUE: 0.00

PAID ON DISCOVER XX2164
**CONCESSION RECOVERY FEE

THANK YOU FOR RENTING WITH BUDGET

CHARGE SLIP	INITIALS <u>TWM</u>
Copies: Telephone Postage Other <u>Rental Car</u>	
Date <u>7/18-19/18</u>	File # <u>16-304</u>
File Name <u>Harrison v. Luxor</u>	
Amount <u>\$127.37</u>	Entered <u>7/25 bp</u>

RENTAL AGREEMENT NUMBER 153287002

RECEIPT

YOUR INFORMATION

Customer Name : MARDNEY, THOMAS
Methods Of Payment : DISCOVER XX2164

YOUR VEHICLE INFORMATION

Budget Car Num : 6 4 4 5 3 9 0 6
Plate Number : CA BDFD759
Veh Grp Charged : Full-Size
Veh Grp Rented : Full-Size
Veh Description : GRV CHEVY MALIBU
Total Driven : 8308 MIs Odometer In: 8309 MIs
Fuel Readings: Out 15.7 Gal / In 13.1 Gal

YOUR RENTAL

Pickup Date/Time : JUL 19, 2018 09:38 PM
Pickup Location : 2501 NORTH HOLLYWOOD WAY
BURBANK, CA, 91505, US

Return Date/Time : JUL 20, 2018 05:08 PM
Return Location : 2501 NORTH HOLLYWOOD WAY
BURBANK, CA, 91505, US

YOUR VEHICLE CHARGES:

MIN 1 DAY, IF NOT MET DLY RT=	65.00MAX	14 DAY
RATE CHART TIME AND MILEAGE		
Mis : Unlimited		
HRLY :	48.76	
DAILY:	65.00	
AD DY:	65.00	
PER :	65.00	
MIN 1DY/ADVE 150FM	+	65.00
Time & Mileage:		65.00
TAXABLE FEES		
VEH LICENSE RECOUP 1.34 /DY	+	1.34
Fuel service charge	+	25.97
11.1% Concession Recovery Fee	+	10.26
Subtotal Charges:		102.57
Sales Tax 9.500%	+	9.74
NEW TAXABLE ITEMS		
±0.50% TAF	+	2.28
CUSTOMER FACILITY CHG 6.00 /D	+	6.00
Your Total Charges Paid:		120.59
Prepayment :		.00
NET CHARGES:	USD	120.59
Your Total Due:		0.00
±TOURISM ASSESSMENT FEE		

YOUR OPTIONAL PRODUCTS/SERVICES

Fuel Service = (15.7 Gal Out- 13.1 Gal In) * \$ 9.990/gal

CHARGE SLIP

INITIALS TWM

Copies	Telephone	Postage	Other <u>Rental Car</u>
Date <u>7/19-20/18</u>	File # <u>16-304</u>		
File Name <u>Harrison v- Luxor</u>			
Amount <u>\$120.59</u>	Entered <u>7/25 bp</u>		

NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES

I agree to the rental charges above. I acknowledge additional charges could be added based on tolls, tickets, fines administrative charges and other fees which may be applicable. X
Thank you for renting with Budget.
If you have questions regarding this rental, call us at 818-841-0447
This vehicle was rented to you by ROD This vehicle was checked in for you by ROD

RECEIPT

Rental Agreement Number: 761864854
Vehicle Number: 81691120

YOUR INFORMATION

16-304

YOUNG, LOREN
RAPID REZ: HC299V
BUDGET DISC:
FASTBREAK ENROLLMENT BUD COM
PAYMENT METHOD: VISA XX2859

YOUR RENTAL

Picked up: JAX
Date/Time: SEP 25, 2017@06:33PM
Returned: JAX
Date/Time: SEP 27, 2017@04:57AM
Veh Group: Intermediate
Veh Charged: Full-Size
Vehicle: CHEVROLET CRUZE
Odometer Out: 13274
Odometer In: 13496
Fuel Reading: Full

YOUR VEHICLE CHARGES

2 DY@ 27 30 54.60
YOUR TIME AND MILEAGE: 54.60

YOUR TAXABLE FEES

**11.11% FEE 6.38
SECURITY FEE 2.00/RNT 2.00
TIRE BATTERY 0.01/DY .02
VEH LIC RECoup 0.80/DY 1.60
ENERGY RECOVERY 0.60/DY 1.20
STATE SURCH 2.00/DY 4.00

YOUR SUBTOTAL

TAXABLE SUBTOT 69.80
TAX 7.000% 4.89

YOUR NON TAXABLE ITEMS

TOTAL CHARGES 74.69
NET CHARGES USD 74.69
YOUR TOTAL DUE: 0.00

PAID ON VISA XX2859
**CONCESSION RECOVERY FEE

THANK YOU FOR RENTING WITH BUDGET

RECEIPT

Rental Agreement Number: 799308742
Vehicle Number: 80126082

YOUR INFORMATION

16-304

YOUNG, LOREN
RAPID REZ: HC299V
BUDGET DISC:
FASTBREAK ENROLLMENT BUD COM
PAYMENT METHOD: VISA XX2859

YOUR RENTAL

Picked up: FLL
Date/Time: SEP 27, 2017@09:38AM
Returned: FLL
Date/Time: SEP 29, 2017@05:38AM
Veh Group: Full Size SUV-8 Pass
Veh Charged: Standard
Vehicle: TOYOTA SEQUOIA 2WD
Odometer Out: 22799
Odometer In: 22883
Fuel Reading: Full

YOUR VEHICLE CHARGES

2 DY@ 27 50 55.00
DISCOUNT 5.0 2.75
YOUR TIME AND MILEAGE: 52.25

YOUR TAXABLE FEES

**10.00% FEE 5.51
TIRE BATTERY 0.01/DY .02
VEH LIC RECoup 0.80/DY 1.60
CUST FAC CHARGE 3.95/DY 7.90
ENERGY RECOVERY 0.60/DY 1.20
STATE SURCH 2.00/DY 4.00

YOUR SUBTOTAL

TAXABLE SUBTOT 72.48
TAX 6.000% 4.35

YOUR NON TAXABLE ITEMS

TOTAL CHARGES 76.83
NET CHARGES USD 76.83
YOUR TOTAL DUE: 0.00

PAID ON VISA XX2859
**CONCESSION RECOVERY FEE

THANK YOU FOR RENTING WITH BUDGET

SHELL
5117 18TH AVE
BIRMINGHAM, AL
35212
57542015003
04/14/2017 919591098
12:44:33 PM

16304

PUMP# 5
REGULAR CR 15.884G
PRICE/GAL \$2.499

FUEL TOTAL \$ 39.69

CREDIT \$ 39.69

XXXX XXXX XXXX 2859
VISA
Swiped
APPROVED
AUTH # 21424
CHU # 107105

Chevron 2080
2080 Griffin Rd
Dania Beach FL 33312
(954) 987-2020
00372260

16-304

Description	Qty	Amount
UNLD CR #01	6.928G	24.28
SELF @ 2.719/ G		
Subtotal		24.28
Tax		0.00
TOTAL		24.28
CREDIT \$		24.28

XXXXXXXXXXXX2859
Stn# 00372260
VISA
Inv# 6043715
Auth# 409242

THANKS COME AGAIN

ST# AB123 TILL XXXX DR# 0 TRAN# 9013127
CSH: 0 09/29/17 05:26:01

16-304 WELCOME TO
PANTRY #1207

DATE 09/26/17 19:58
TRAN# 9028541
PUMP# 02
SERVICE LEVEL: SELF
PRODUCT: UNLD
GALLONS: 7.578
PRICE/G: \$ 2.629
FUEL SALE \$ 19.92
CREDIT \$19.92

Visa
XXXXXXXXXXXX2859
Auth #: 816275
Resp Code: 0
Stan: 04973635369
Invoice #: 826952
Shift #: 1



L. Young

Room: 228

Room Type: EXKS

Number of Guests: 1

Rate: \$117.00

Clerk:

Arrive: 12Apr17

Time: 05:48PM

Depart: 14Apr17

Time:

Folio Number: 90411

Date

Description

Charges

Credits

12Apr17

Room Charge

126.00

12Apr17

Occupancy Sales Tax

25.20

13Apr17

Room Charge

117.00

13Apr17

Occupancy Sales Tax

23.40

14Apr17

Visa

291.60

Card #: VXXXXXXXXXXXX2859/XXXX

Amount: 291.60 Auth: 712184 Signature on File

This card was electronically swiped on 12Apr17

Balance: 0.00

Rewards Account # XXXXX1510. Your Rewards points/miles earned on your eligible earnings will be credited to your account. Check your Rewards Account Statement or your online Statement for updated activity.

As requested, a final copy of your bill will be emailed to you at: LXXXX@LGCLAWOFFICE.COM. See "Internet Privacy Statement" on Marriott.com.

16-304 Harrison



Fairfield Inn & Suites®
Chicago Midway Airport

6630 S. Cicero Ave.
Bedford Park IL 60538
708.594.0090

T. Maroney

Room: 522

Room Type: KING

Number of Guests: 1

Rate: \$199.00

Clerk:

Arrive: 18Jul18

Time: 09:19PM

Depart: 19Jul18

Time:

Folio Number: 52240

Date	Description	Charges	Credits
18Jul18	Room Charge	199.00	
18Jul18	State Occupancy Tax	11.94	
18Jul18	City Tax	20.90	
18Jul18	County Tax	1.99	
19Jul18	Discover		233.83
Card #: DSXXXXXXXXXXXX2164XXXX			
Amount: 233.83 Auth: 01813B Signature on File			
Balance:		0.00	

Rewards Account # XXXXX4767. Your Rewards points/miles earned on your eligible earnings will be credited to your account. Check your Rewards Account Statement or your online Statement for updated activity.

See our "Privacy & Cookie Statement" on Marriott.com.

<u>CHARGE SLIP</u>		INITIALS <u>TWM</u>	
Copies	Telephone	Postage	Other <u>Hotel</u>
Date <u>7/18-19/18</u>	File # <u>16-304</u>		
File Name <u>Harrison v. Luxor</u>			
Amount <u>\$233.83</u>	Entered <u>7/25 bp</u>		

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BURBANK AIRPORT MARRIOTT

GUEST FOLIO

424	MARONEY/THOMAS	259.00	07/20/18	12:00	10282
ROOM	NAME	RATE	DEPART	TIME	ACCT#
GK	LINCOLN GUSTAFSON &		07/19/18	22:41	
TYPE	2557 BELGREEN ST.		ARRIVE	TIME	
7	89135				
ROOM		DSXXXXXXXXXXXX2164			MRW#:
CLERK	ADDRESS	PAYMENT			

DATE	REFERENCES	CHARGES	CREDITS	BALANCES DUE
07/19	PARKING #1028240	21.00		
07/19	PARK TAX #1028240	2.52		
07/19	HSIA BASEHSIA	9.95		
07/19	ROOM 424, 1	259.00		
07/19	OCC TAX 424, 1	25.90		
07/19	OTA FEE 424, 1	.51		
07/19	TOUR TAX 424, 1	2.59		
07/20	CCARD.DS		321.47	
	PAYMENT RECEIVED BY: DISCOVER	XXXXXXXXXXXX2164		.00

See our "Privacy & Cookie Statement" on Marriott.com

CHARGE SLIP INITIALS TWM

Copies Telephone Postage Other _____

Date 7/19-20/18 File # 16-304

File Name Harrison v. Luxor

Amount \$321.47 Entered 7/25/18



BURBANK AIRPORT MARRIOTT
 2500 N HOLLYWOOD WAY
 BURBANK, CA 91505
 PH# 818-843-6000 FAX# 818-842-9720

Treat yourself to the comfort of Marriott Hotels in your home. Visit ShopMarriott.com.

This statement is yours only receipt. You have agreed to pay in cash or by approved personal check or to authorize us to charge your credit card for all amounts charged to you. The amounts shown in the credit column opposite any credit card entry in the reference column above will be charged to the credit card number set forth above. (The credit card company will bill in the usual manner.) If for any reason the credit card company does not make payment on this account, you will owe us such amount, if you are direct billed. In the event payment is not made within 25 days after check-out, you will owe us interest from the check-out date on any unpaid amount at the rate of 1.5% per month (ANNUAL RATE 18%), or the maximum allowed by law, plus the reasonable cost of collection, including attorney fees.

Signature X



Fairfield Inn & Suites®
Jacksonville Airport

1300 Airport Rd
Jacksonville FL 32218
904.741.3500

L. Young

*Harrison
16-304*

Room: 324

Room Type: QNQN

Number of Guests: 1

Rate: \$136.00

Clerk:

Arrive: 25Sep17

Time: 06:56PM

Depart: 27Sep17

Time:

Folio Number: 55507

Date

Description

Charges

Credits

25Sep17
25Sep17
25Sep17
26Sep17
26Sep17
26Sep17
27Sep17

Room Charge
State Occupancy Tax
City Tax
Room Charge
State Occupancy Tax
City Tax
Visa

117.00
8.19
7.02
136.00
9.52
8.16

285.89

Card #: VXXXXXXXXXXXX2859XXXX

Amount: 285.89 Auth: 715265 Signature on File

Balance: 0.00

Rewards Account # XXXXX1510. Your Rewards points/miles earned on your eligible earnings will be credited to your account. Check your Rewards Account Statement or your online Statement for updated activity.

As requested, a final copy of your bill will be emailed to you at: LXXXXX@LGCLAWOFFICE.COM. See "Internal Privacy Statement" on Marriott.com.

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Residence Inn by Marriott

4801 Anglers Ave
 Dania Beach, FL 33312
 T 954 989.3636

L. Young

*Harrison
 16-304*

Room: 231
 Room Type: STDO
 Number of Guests: 1
 Rate: \$117.00 Clerk:

Arrive: 27Sep17 Time: 01:56PM Depart: 29Sep17 Time: Folio Number: 76690

Date	Description	Charges	Credits
27Sep17	Room Charge	117.00	
27Sep17	Occupancy Sales Tax	5.85	
27Sep17	State Occupancy Tax	7.02	
28Sep17	Room Charge	117.00	
28Sep17	Occupancy Sales Tax	5.85	
28Sep17	State Occupancy Tax	7.02	
29Sep17	Visa <i>Card #: VXXXXXXXXXXXX2859XXXX Amount: 259.74 Auth: 217265 Signature on File</i>		259.74
	Balance:	0.00	

Rewards Account # XXXXX1510. Your Rewards points/miles earned on your eligible earnings will be credited to your account. Check your Rewards Account Statement or your online Statement for updated activity.

As requested, a final copy of your bill will be emailed to you at: LXXXXX@LGCLAWOFFICE.COM. See "Internet Privacy Statement" on Marriott.com.

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Native Foods Cafe

218 South Clark Street
Chicago, IL 60604
Phone (312) 332-6332

Duplicate Receipt #1
7/19/2018 1:49:02 PM
Order Id: ARW85G36AGCD
23 - Dine In
Employee: Franco

1 Native Chicken Run Ranch	\$10.50
Sub: Pretzel Bun	\$1.00
Sweet Potato Fries (Side)	\$1.00
Sub Total	\$12.50
Sales Tax	\$1.44
Order Total	\$13.94
Cash	\$13.94
Change Due	\$0.00

Native Foods Cafe

218 South Clark Street
Chicago, IL 60604
Phone (312) 332-6332

7/19/2018 1:49:29 PM
Order Id: ARW85G36AGCE
a - Dine In
Employee: Franco

1 Lavender Lemonade	\$3.25
Sub Total	\$3.25
Sales Tax	\$0.37
Order Total	\$3.62
Cash	\$3.62
Change Due	\$0.00

CHARGE SLIP		INITIALS <u>TWM</u>	
Copies	Telephone	Postage	Other
Date	<u>7/19/18</u>	File #	<u>16-304</u>
File Name	<u>Harrison v. Luxor</u>		
Amount	<u>\$17.56</u>	Entered	<u>7/22 bp</u>

FULL MOON BBQ
FULTONDALE
0755 #Party 1
PM RIGHT D SvrCk: BB 8:03p 04/12/17
16304

1 BABY BACK RIB PL,	13.99
frd green tomato, slaw	
1 *ALL TO GO*	0.00
1 *TO GO*	0.00
1 COKE ZERO 32 OZ	2.29
Sub Total:	16.28
Tax	1.63
04/12 8:05p TOTAL:	17.91

DATE 4/13/17 TIME 9:02:50PM
MID 13400000106/44/010

O'Charley's #305 16304
1709 Fulton Rd.
Fultondale, AL
35068
205-849-6401

VISA XXXXXXXXXXXX2859 S
AUTH 123120 181 102 CHECK 1627542
PRE-AUTH Dining Room Christin S
AMOUNT 20.77
TAX 2.08

SUBTOTAL \$ 22.85
TIP \$ 4.00
TOTAL \$ 26.85

The Jacksonville Millhouse
 1341 Airport Road
 Jacksonville, FL 32218
 Date: Sep25'17 08:05PM
 Card Type: Visa
 Acct #: XXXXXXXXXXXX2859
 Card Entry: SWIPED
 Trans Type: PURCHASE
 Trans Key: 1110057721:9953
 Auth Code: 915250
 Check: 140
 Table: 701/1
 Server: CS Corbin A

16-304

Subtotal: 45.90
 Tip: _____
 Total: _____

Signature _____

0214
 Server: TIFFANY B (#162) Rec:135
 09/26/17 19:33, Swiped T: 406 Term: 36

BJ'S RESTAURANTS 542
 15022 MAX LEGGETT PKWY
 JACKSONVILLE, FL 32218
 (904)751-4935
 MERCHANT #:

16-304

CARD TYPE ACCOUNT NUMBER
 VISA XXXXXXXXXXXX2859
 DO TRANSACTION APPROVED
 AUTHORIZATION #: 8162:3
 Reference: 0926010000214
 TRANS TYPE: Credit Card SALE

CHECK : 10.69
 TIP : _____
 TOTAL : 12.69



FT. LAUDERDALE INT'L AIRPORT
 320 TERMINAL DRIVE
 FT. LAUDERDALE, FL 33315

STORE: 01639 REG: 002 CASHIER: Nathalie
 CALIFORNIA NATURALS CAPE
 087076244378 1 @ 5.99 5.00 N
 5.99 - .99 543367 SNACK CALI PROMO
 CALIFORNIA NATURALS PROT
 087076247331 1 @ 5.99 4.99 N
 5.99 - 1.00 543367 SNACK CALI PROMO
 GLACEAU SMART WATER 700
 786162001511 1 @ 3.89 3.89 N
 SUBTOTAL 13.88
 TOTAL 13.88

*** YOU SAVED 1.99 ***

AMOUNT TENDERED
 Visa 13.88
 SALE
 ACCT: *****2859
 EXP: *****
 APPROVAL: 509261
 ENTRY METHOD: SWIPED

16-304

TOTAL PAYMENT 13.88
 Transaction: 8730 9/29/2017 6:16 AM

Anthony's Coal Fired Pizzo

0265
 Server: CHANTAL I (rec:12d)
 09/27/17 21:36, Swiped T: 23 Term: 3

ACCP FORT LAUDERDALE
 2203 Federal Highway
 FORT LAUDERDALE, FL
 (352)462-5555

CARD TYPE ACCOUNT NUMBER
 VISA XXXXXXXXXXXX2859
 Name: LOREN S YOUNG
 DO TRANSACTION APPROVED
 AUTHORIZATION #: 027:24
 Reference: 0927010000265
 TRANS TYPE: Credit Card SALE

TOTAL : 18.53
 Tip : 3.00
 TOTAL : 21.53



16304

ESPRESSO CAFE

321 S Casino December 10, 2018
Center Blvd Suite 12:09 PM
120 GERMAN
LAS VEGAS, NV 89101
(702) 366-0665
www.espressioncafe.com

Receipt: qwfv
Ticket: 54
Authorization: 410190

Visa Credit
AID A0 00 00 00 03 10 10

FOR HERE

Wraps	\$10.24
Chicken Caesar, Sweet Potatoes & Drink (\$2.99)	
Burgers	\$8.98
Cheeseburger, Fries & Drink (\$1.99)	
Paninis	\$7.25
Turkey Club	
Fountain Drink	\$2.75
Large	
<hr/>	
Subtotal	\$29.22
Sales Tax	\$2.41
Tip	\$4.74
<hr/>	
Total	\$36.37
Visa 2859 (Chip)	\$36.37

Capriotti's Sandwich Shop
200 Lewis Ave.
Las Vegas, NV 89101
(702) 631-1112

LOREN

Host: Jake 12/12/2018
LOREN 12:20 PM
20116

16304

Energy Drink	2.39
Small Chips (2 @1.29)	2.58
Medium Drink (2 @1.99)	3.98
12" Ham&Chez	8.99
Mayo	
Mustard	
Pickles	
1/2 Cup Chicken Noodle Soup	4.99
Large Drink	2.29

Did we blow your mind or disappoint?
Give us feedback in next 3 days and get
FREE SM SUB w PURCHASE OF SUB OR SALAD
Visit: TELLCAPRIOTTIS.COM USE CODE:

| 627 102 100 127 113 |

Reward expires in 30 days
One survey per customer every 30 days
**** Valid at this Capriotti's Only ****

Subtotal	25.22
Tax	2.08

Here Total 27.30

VISA XXXXXXXXXXXXX2859 27.30
Auth:412102

Tip : 2.00
TOTAL : 29.30

TOTAL :

Capriotti's Sandwich Shop
200 Lewis Ave.
Las Vegas, NV 89101
(702) 631-1112

LORAN

16-304

Host: Jake
LORAN
12/13/2018
12:09 PM
20091

9" Capastroni	8.99
Medium Drink (2 \$1.99)	3.98
12" Chz Steak	9.99
F. Sweets	

Did we blow your mind or disappoint?
Give us feedback in next 3 days and get
FREE SM SUB w PURCHASE OF SUB OR SALAD
Visit: TELLCAPRIOTTIS.COM USE CODE:

| 127 902 000 137 113 |

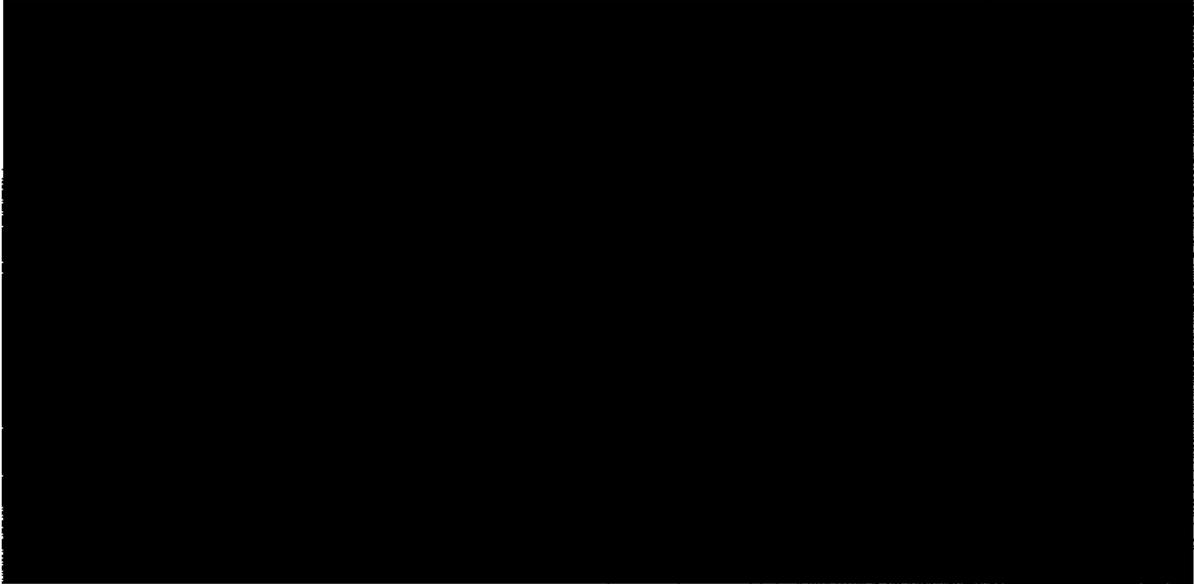
Reward expires in 30 days
One survey per customer every 30 days
*** Valid at this Capriottis Only ***

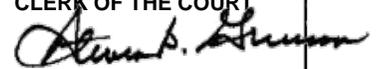
Subtotal	22.66
Tax	1.87
Here Total	24.53
VISA #XXXXXXXXXXXX2859	24.53
Auth:413101	

Tip : _____
TOTAL : _____ **24.53**
TOTAL



12/11	12/10	8495	SQ *ESPRESSION CAFE	LAS VEGAS	NV	✓	\$36.37	<u>16.304</u>	HENRI SOT
12/14	12/12	8008	CAPRIOTTI'S SANDWI	LAS VEGAS	NV	✓	\$29.30	<u>16.304</u>	"
12/17	12/13	1768	CAPRIOTTI'S SANDWI	LAS VEGAS	NV	✓	\$24.53	<u>16.304</u>	"
12/17	12/14	7412	SQ *ESPRESSION CAFE	LAS VEGAS	NV		\$41.06	<u>16.304</u>	"





1 **NEOJ**
2 **BRIAN K. TERRY, ESQ.**
3 Nevada Bar No. 003171
4 **VINCENT M. GODINHO**
5 Nevada Bar No. 14205
6 **THORNDAL, ARMSTRONG, DELK,**
7 **BALKENBUSH & EISINGER**
8 1100 East Bridger Avenue
9 Las Vegas, NV 89101-5315
10 Mail To:
11 P.O. Box 2070
12 Las Vegas, NV 89125-2070
13 Tel.: (702) 366-0622
14 Fax: (702) 366-0327
15 E-Mail: bterry@thorndal.com
16 E-Mail: vmg@thorndal.com
17 Attorneys for Defendant, Pride
18 Mobility Products Corp.

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

14 **VIVIA HARRISON, an individual,**
15 **Plaintiff,**

16 vs.

17 **RAMPARTS, INC., dba LUXOR HOTEL &**
18 **CASINO, a Nevada Domestic Corporation;**
19 **DESERT MEDICAL EQUIPMENT, a Nevada**
20 **Domestic Corporation; PRIDE MOBILITY**
21 **PRODUCTS CORP., a Nevada Domestic**
22 **Corporation; DOES I through XXX, inclusive**
23 **and ROE BUSINESS ENTITIES I through**
24 **XXX, inclusive,**
25 **Defendants.**

23 **DESERT MEDICAL EQUIPMENT, a Nevada**
24 **Domestic Corporation**

25 **Third-Party Plaintiff,**

26 vs.

27 **STAN SAWAMOTO, an individual**

28 **Third-Party Defendant.**

CASE NO.: A-16-732342-C

DEPT. NO.: XXIX

NOTICE OF ENTRY OF ORDER

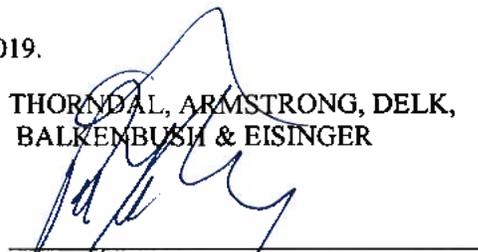
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TO: ALL PARTIES AND THEIR COUNSEL OF RECORD.

PLEASE TAKE NOTICE that the court entered the order granting defendant, Pride Mobility Products Corp.'s, renewed motion for summary judgment on the 23rd day of January, 2019, in the above-captioned matter, a copy of which is attached hereto as Exhibit "A".

DATED this 23rd day of January, 2019.

THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER



Brian K. Terry, Esq.
Nevada Bar No. 3171
Vincent M. Godinho, Esq.
Nevada Bar No. 14205
1100 East Bridger Avenue
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Mail To:
P.O. Box 2070
Las Vegas, NV 89125-2070
Tel.: (702) 366-0622
Fax: (702) 366-0327
E-Mail: bterry@thorndal.com
E-Mail: vmg@thorndal.com
Attorneys for Defendant, Pride Mobility
Products Corp.

CERTIFICATE OF SERVICE

Pursuant to NRCP Rule 5(b), on the 29th day of January, 2019, service of **NOTICE OF ENTRY OF ORDER** was made upon each of the parties via electronic service through the Eighth Judicial District Court's Odyssey E-File and Serve system.

NAME	TEL., FAX & E-MAILS	PARTY REPRESENTING
Matthew G. Pfau, Esq. Parry & Pfau 880 Seven Hills Dr. Suite 210 Henderson, Nevada 89052	Tel.: (702) 879-9555 Fax: (702) 879-9556 E-Mail: matt@P2lawyers.com	Co-Counsel for Plaintiff, Vivia Harrison
Boyd B. Moss, III, Esq. Marcus Berg, Esq. Moss Berg Injury Lawyers 4101 Meadows Lane Suite 110 Las Vegas, NV 89107	Tel.: (702) 222-4555 Fax: (702) 222-4556 E-Mail: boyd@mossberglv.com	Co-Counsel for Plaintiff, Vivia Harrison
LeAnn Sanders, Esq. Courtney Christopher, Esq. Alverson, Taylor & Sanders 6605 Grand Montecito kwy. Suite 200 Las Vegas, Nevada 89149	Tel.: (702) 384-7000 Fax: (702) 385-7000 E-Mail: lsanders@alversonstaylor.com E-Mail: cchristopher@alversonstaylor.com	Defendant/Third-Party Plaintiff, Desert Medical Equipment
Loren S. Young, Esq. Thomas W. Maroney, Esq. Lincoln, Gustafson & Cercos 3960 Howard Hughes Pkwy. Suite 200 Las Vegas, Nevada 89169	Tel.: (702) 257-1997 Fax: (702) 257-2203 E-Mail: lyoung@lgclawoffice.com E-Mail: tmaroney@lgclawoffice.com	Defendant, Ramparts, Inc. dba Luxor Hotel & Casino
Stacey A. Upson, Esq. Law Offices of Karl H. Smith 7455 Arroyo Crossing Pkwy. Suite 200 Las Vegas, NV 89113	Tel: (702) 408-3800 Fax: (855) 472-9294 E-Mail: Stacey.upson@farmersinsurance.com	Third-Party Defendant, Stan Sawamoto

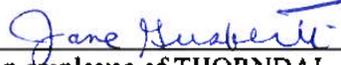
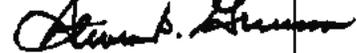

An employee of THORNDAL, ARMSTRONG,
DELK, BALKENBUSH & EISINGER

EXHIBIT "A"



1 OGSJ (CIV)
 2 BRIAN K. TERRY, ESQ.
 Nevada Bar No. 003171
 3 VINCENT M. GODINHO
 Nevada Bar No. 14205
 4 THORNDAL, ARMSTRONG, DELK,
 BALKENBUSH & EISINGER
 5 1100 East Bridger Avenue
 Las Vegas, NV 89101-5315
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 7 Las Vegas, NV 89125-2070
 Tel.: (702) 366-0622
 8 Fax: (702) 366-0327
 9 E-Mail: bterry@thorndal.com
 E-Mail: vmg@thorndal.com
 10 Attorneys for Defendant, Pride
 Mobility Products Corp.
 11

12 DISTRICT COURT
 13 CLARK COUNTY, NEVADA

14 VIVIA HARRISON, an individual,
 15 Plaintiff,
 16 vs.

CASE NO.: A-16-732342-C
 DEPT. NO.: XXIX

17 RAMPARTS, INC., dba LUXOR HOTEL &
 CASINO, a Nevada Domestic Corporation;
 18 DESERT MEDICAL EQUIPMENT, a Nevada
 Domestic Corporation; PRIDE MOBILITY
 19 PRODUCTS CORP., a Nevada Domestic
 Corporation; DOES I through XXX, inclusive
 20 and ROE BUSINESS ENTITIES I through
 XXX, inclusive,
 21

**ORDER GRANTING DEFENDANT,
 PRIDE MOBILITY PRODUCTS CORP.'S,
 RENEWED MOTION FOR SUMMARY
 JUDGMENT**

22 Defendants.

Date of Hearing: 08/29/18

23 DESERT MEDICAL EQUIPMENT, a Nevada
 Domestic Corporation
 24

Time of Hearing: 9:00 a.m.

25 Third-Party Plaintiff,
 26 vs.

27 STAN SAWAMOTO, an individual

28 Third-Party Defendant.

1 On August 29, 2018, defendant, Pride Mobility's renewed motion for summary judgment
2 came on for hearing. In attendance on behalf of plaintiff were Matthew Pfau and Boyd B. Moss.
3 On behalf of defendant, Pride Mobility Products Corp., was Brian K. Terry. On behalf of
4 Ramparts, Inc. d/b/a Luxor Hotel & Casino was Thomas Maroney. On behalf of defendant/third
5 party-plaintiff, Desert Medical Equipment was Courtney Christopher. Appearing on behalf of
6 third-party defendant, Stan Sawamoto, was Stacey Upson. The court, after being advised of the
7 various arguments of counsel and entertaining lengthy argument, and after having reviewed the
8 briefs and attachments thereto, issues the following findings of facts and conclusions of law.
9

10 **I.**

11 **FINDINGS OF FACT**

12 1. Defendant, Pride Mobility, initially filed a motion for summary judgment seeking
13 dismissal of the claims against it on grounds that there was no product for it to inspect. A
14 hearing on the matter was held on June 26, 2017, and this court denied the motion without
15 prejudice, and allowed plaintiff to proceed forward on a design defect claim.
16

17 2. Discovery ensued, with experts designated on behalf of all parties. After
18 deposition of plaintiff's design expert, Pride determined to re-file its motion for summary
19 judgment asserting plaintiff's expert failed to opine that any alleged defect in the design
20 proximately caused the injuries sustained by plaintiff. Moreover, plaintiff's expert failed to
21 opine that any alternative design would have prevented the accident involving plaintiff.
22

23 3. In the pleadings provided to the court in support and in opposition to the motion,
24 copies of the various expert reports were provided in total. Those reports included the report
25 prepared by Timothy M. Hicks, P.E., of Professional Analysis and Consulting on behalf of
26 plaintiff. Also attached was the report of Kenneth A. Solomon, Ph.D., P.E., of the Institute of
27 Risk & Safety Analysis on behalf of Pride Mobility, as well as the report of Michael Zablocky,
28 also in support of Pride Mobility. Lastly, the complete report of William A. Ammer, of Ammer

1 Consulting was provided, which was prepared on behalf of Desert Medical Equipment. In
2 preparation for the oral argument and hearing, the court reviewed all expert reports.

3 4. On August 29, 2018, the renewed motion for summary judgment by Pride
4 Mobility came on for hearing. Lengthy oral argument was entertained by Brian K. Terry, on
5 behalf of Pride Mobility, as well as by Matthew Pfau on behalf of plaintiff.

6 5. During oral argument, the court specifically inquired of Matthew Pfau on behalf
7 of plaintiff regarding the alternative design referenced by plaintiff's expert and the anti-tip
8 wheels which could have been installed on the front of the scooter.

9 6. The court specifically inquired and indicated that even though an alternative
10 design theory was argued, nowhere in the expert report of Mr. Hicks did he indicate the
11 alternative design, if implemented, would have prevented the incident from happening. It is the
12 court's determination this is a predicate finding in order to support the validity of the alternative
13 design and to overcome defendant's renewed motion for summary judgment. There was no such
14 finding nor opinion contained anywhere in Mr. Hicks' report.
15

16 II.

17 CONCLUSIONS OF LAW

18 1. Expert testimony regarding causation must be made to a reasonable degree of
19 scientific probability in order to assist a trier of fact. *Williams v. Eighth Judicial District Court*
20 *of Nevada, 127 Nev. 518, 529, 262 P.2d. 360, 367 (2011).*
21

22 2. In a product liability case, plaintiff must establish the product was defective, that
23 the defect existed at the time the product left the manufacturer and the defect caused plaintiff's
24 injuries. *Ford Motor Company v. Trejo, 402 P.3d. 649, 653 Nev. (2017).* See also, *Shoshone*
25 *Coca Cola Company, 82 Nev. 439, 443, 420 P.2d. 855 (1996).*
26

27 3. In order for plaintiff to prevail that an alternative design was available, expert
28 testimony is required to establish the availability and reasonableness of the alternative design and

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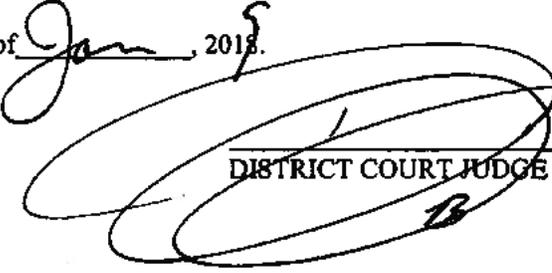
that if said alternative design had been implemented, it would have prevented the incident in question.

4. Plaintiff's expert failed to opine that if the anti-tip wheels had been added to the front of the scooter, the incident would not have happened. This opinion must be present in order to prevail on an alternative design theory.

Based on the above findings of facts and conclusions of law, it is hereby

ORDERED, ADJUDGED AND DECREED that defendant, Pride Mobility Products Corporations' renewed motion for summary judgment is granted.

DATED this 23 day of Jan, 2018.


DISTRICT COURT JUDGE
B

Submitted by:

THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER



Brian K. Terry, Esq.
Nevada Bar No. 3171
Vincent M. Godinho, Esq.
Nevada Bar No. 14205
1100 East Bridger Avenue
P. O. Drawer 2070
Las Vegas, Nevada 89125-2070
Tel.: (702) 366-0622
Fax: (702) 366-0327
E-Mail: bterry@thorndal.com
Attorneys for Defendant, Pride Mobility
Products Corporation

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Vivia Harrison v. Ramparts, Inc.
dba Luxor Hotel & Casino, et al.
Case No. A-16-732342-C
Dept. No. XXIX
Order Granting Defendant, Pride
Mobility Products Corp.'s, Renewed
Motion for Summary Judgment

APPROVED AS TO FORM AND CONTENT.

PARRY & PFAU



Matthew G. Pfau, Esq.
Attorney for Plaintiff, Vivia Harrison

MOSS BERG INJURY LAWYERS



Boyd B. Moss, III, Esq.
Attorney for Plaintiff, Vivia Harris

ALVERSON, TAYLOR & SANDERS



Courtney Christopher, Esq.
Attorney for Defendant/Third-Party
Plaintiff, Desert Medical Equipment

LINCOLN, GUSTAFSON & CERCOS



Thomas W. Maroney, Esq.
Attorney for Defendant, Ramparts, Inc. d/b/a
Luxor Hotel & Casino

LAW OFFICES OF KARL H. SMITH



Stacey A. Upson, Esq.
Attorney for Third-Party Defendant,
Stan Sawamoto

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Vivia Harrison v. Ramparts, Inc.
dba Luxor Hotel & Casino, et al.
Case No. A-16-732342-C
Dept. No. XXIX
Order Granting Defendant, Pride
Mobility Products Corp.'s, Renewed
Motion for Summary Judgment

APPROVED AS TO FORM AND CONTENT.

PARRY & PFAU



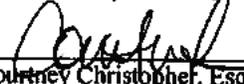
Matthew G. Pfau, Esq.
Attorney for Plaintiff, Vivia Harrison

MOSS BERG INJURY LAWYERS



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Attorney for Plaintiff, Vivia Harris

ALVERSON, TAYLOR & SANDERS



Courtney Christopher, Esq.
Attorney for Defendant/Third-Party
Plaintiff, Desert Medical Equipment

LINCOLN, GUSTAFSON & CERCOS



Thomas W. Maroney, Esq.
Attorney for Defendant, Ramparts, Inc. d/b/a
Luxor Hotel & Casino

LAW OFFICES OF KARL H. SMITH



Stacey A. Upson, Esq.
Attorney for Third-Party Defendant,
Stan Sawamoto

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Vivia Harrison v. Ramparts, Inc.
dba Luxor Hotel & Casino, et al.
Case No. A-16-732342-C
Dept. No. XXIX
Order Granting Defendant, Pride
Mobility Products Corp.'s, Renewed
Motion for Summary Judgment

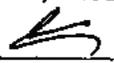
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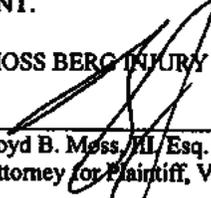
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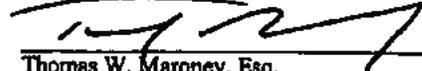
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Case # A-16-732342-C - Vivia Harrison, Plaintiff(s)vs.MGM

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Case Information

Location Department 29	Category Civil	Case Type Negllgence - Premises Liability
Case Initiation Date 2/24/2016	Case # A-16-732342-C	
Assigned to Judge Jones, David M		

Filings

Filing Type EFileAndServe	Filing Code Order Granting Summary Judgment - OGSJ (CIV)
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Filing Description
Order Granting Defendant, Pride
Mobility Products Corp.'s Renewed
Motion for Summary Judgment

Client Reference Number
Pridemo-Harris/BKT-jmg

Filing on Behalf of
Pride Mobility Products Corp

Filing Status Accepted	Accepted Date 1/29/2019 1:13 PM PST
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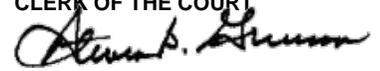
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Sent	Stacey A. Upson	Law Office of Stacey A. Upson	Yes	Not
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Sent	David J. Mortensen .		Yes	1/29
Sent	Jane Gusberti .		Yes	Not
Sent	Kaylee Calaguas .		Yes	Not
Sent	Loren Young .		Yes	Not
Sent	Matt Pfau .		Yes	Not
Sent	Ofelia Acevedo .		Yes	Not
Sent	Ofelia Acevedo .		Yes	Not
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6 Attorneys for Plaintiff,
7 *Vivia Harrison*

DISTRICT COURT
CLARK COUNTY, NEVADA

* * *

10 **Vivia Harrison**, an individual

Case No.: A-16-732342-C

Dept. No.: XXIX

11 Plaintiff,

12 vs.

13 **Ramparts, Inc., dba Luxor Hotel &**
14 **Casino**, a Nevada Domestic
15 Corporation; **Desert Medical**
16 **Equipment**, a Nevada Domestic
17 Corporation; Does I-X; Roe Corporations
18 I-X,

**Opposition to Defendant Ramparts,
Inc. d/b/a Luxor Hotel & Casino's
Motion for Attorney's Fees and Costs**

18 Defendants.

PARRY & PFAU

20 Plaintiff, Vivia Harrison (hereinafter "Vivia"), by and through her attorneys of
21 record, Matthew G. Pfau, of the law firm of Parry & Pfau, hereby files the filing
22 Opposition to Defendants' Motion for Fees and Costs.

23 This opposition is made and based on the papers and pleadings on file herein,
24 the following Memorandum of Points and Authorities, and upon any oral argument
25 of counsel which may be entertained by the Court at the time of hearing of this
26 matter.

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DATED this 4th day of February 2019.

PARRY & PFAU



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Attorney for Plaintiff,
Vivia Harrison

Memorandum of Points and Authorities

I.

Introduction

To recover costs and attorney’s fees based on an offer of judgment, Defendants must first satisfy the “Beattie factors.” Defendants must demonstrate that Vivia brought forth this lawsuit and proceeded to trial in “bad faith” and that Vivia’s decision not to accept Defendants’ Offer of Judgment was “grossly unreasonable.”

Based on the information known at the time of the offer of judgment (and not retrospectively based on the jury’s undervalued verdict), Vivia’s decision not to accept Defendants’ offer of judgment simply cannot be fairly characterized as unreasonable, let alone “grossly unreasonable” or in “bad faith”. Accordingly, this Court should not award any attorney’s fees or costs to Defendants.

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II.
Law and Argument

A. Defendants are not entitled to an award for attorney’s fees based on thier Offer of Judgment because of the Beattie factors analysis.

An award of attorney’s fees based on a rejected offer of judgment is discretionary, not mandatory. In deciding whether to award fees under these circumstances, a court must consider the following factors: (1) whether the offeree’s claim or defense was maintained in good faith; (2) whether the offer of judgment was reasonable and in good faith in both its timing and amount; (3) whether the offeree’s decision to reject the offer and proceed to trial was grossly unreasonable or in bad faith; and (4) whether the fees sought by the offeror are reasonable and justified in amount.¹

1. Vivia’s claims were maintained in good faith.

Defendant concedes the argument that Vivia’s claims were not in good faith therefore, no further argument is needed on this point.

2. Luxor’s Offer of Judgment was not in good faith given the timing and the amount offered.

On March 23, 2017, the day that Luxor served their Offer of Judgement, substantial discovery as to the extent of Luxor’s liability had not yet been completed. Luxor’s 30(b)6 representatives were not deposed until December 20, 2017. During those depositions Vivia learned through Luxor’s witness, Lyndsi Stull, that the Luxor had a policy to always have someone in the dining room of the Deli when multiple

¹ See *Beattie v. Thomas*, 99 Nev. 579, 588-89, 668 P.2d 268, 274 (1983) (reversing award of attorney’s fees due to district court’s failure to make findings on all four factors); *Yamaha Motor Co. v. Arnault*, 114 Nev. 233, 251-52, 955 P.2d 661, 673 (1998) (reversing award of attorney’s fees in favor of prevailing plaintiff for failing to adequately consider reasonableness of offeree’s defenses).

1 witnesses stated that there were no Luxor employees present 40 minutes before the
2 incident. Vivia also learned through Luxor's witness, Kimberly Diagacomo, that Luxor
3 had not implemented a screening policy to assure that the proper mobility scooter
4 was rented to a disabled individual.

5 Luxor did not disclose the furniture layout of the Backstage Deli until September
6 15, 2017 which Lyndi Stull said was the safety director's approved plan for the
7 restaurant. Then based on the representations of the disclosed furniture layout, as
8 inspection of the Backstage Deli was completed on January 31, 2018.

9 These facts, discovered afer Luxor's Offer, were all presented to a jury during the
10 trial. After the verdict was read, on the record, 2 jurors stated that they wanted to
11 give a verdict in favor of Vivia. Defendant makes reference to it's own interpretation
12 of conversations off the record to attempt to convince the court that Vivia's claims
13 were meritless. The Defendant states that none of Vivia's experts provided evidence
14 that the Backstage Deli was dangerous, yet, two jurors agreed with Vivia and wanted
15 to render a verdict in her favor. This is a manipulation of the recorded facts to suit
16 the Defendant's own motives.

17 Further, Vivia's injury was substantial and far in excess of the \$1,000 offered by
18 Luxor. Vivia had \$418,544.37 in documented medical expenses that the Luxor was
19 fully made aware of at the time of the Offer.

20 The scope of Luxor's liability was still in question at the time the Offer was made
21 and the inconsequential amount that was offered to Vivia demonstrat that Luxor's
22 offer was not in good faith. If Luxor wanted to act in good faith, they could have
23 served an renewed Offer of Judgment after discovery had closed and all the fact
24 regarding liability were exposed. After discovery closed everyone had thier cards on
25 the table and a reasonable discussion could be held between Vivia and Luxor as to
26 why Luxor was valuing thier case they way they did. However, without all the facts
27 regarding Luxor's liability on the table, Luxor could not properly evaluate thier liability
28

1 and therefore could not serve an Offer to Vivia that they felt was in good faith.

2
3 **3. Vivia's decision to reject the Offer of Judgment and proceed to trial was**
4 **not grossly unreasonable or in bad faith.**

5 Vivia's decision not to accept Defendants' Offer of Judgment cannot be fairly
6 characterized as unreasonable, let alone "grossly" unreasonable. As previously
7 stated, at the time Defendants' Offer of Judgment was rejected, Vivia and her counsel
8 has significant discovery that needed to be accomplished before Defendant's liability
9 could be properly assessed. Not knowing what Luxor's 30(b)6 witnesses were going
10 to testify to and the approved layout of the dining area of the Backstage Deli, it was
11 impossible to properly value whether a \$1,000 offer would be appropriate. The
12 proper facts to evaluate the case were not in Vivia's hands at the time of the Offer.
13 The rejection of Defendant's Offer therefore was not unreasonable or in bad faith.

14
15 **4. The amount of fees sought by Defendant are irrelevant under the Beattie**
16 **factors.**

17 Because Vivia's claims were maintained in good faith, and because Vivia's
18 decision not to accept Defendants' Offer of Judgment was not grossly unreasonable
19 or in bad faith, this final factor is irrelevant, and fees should not be awarded.²

20
21 **B. Defendants are not entitled the requested award for attorney's fees based**
22 **NRS 18.010.**

23 Defendants are not entitled for an award for attorney's fees for the reasons
24 previously stated. If this Court determines that Defendant is entitled to some fees
25 under NRS 18.010 for prevailing at trial, the award for attorney's fees should be
26 related specifically for the fees that were incurred at trial. Defendant should not be

27 _____
28 ² See *Frazier v. Drake*, 357 P.3d 365, 17 373, 131 Nev. Adv. Rep. 64 (2015).

1 entitled for attorney's fees for work completing in preparing for trial, including time
2 to prepare and perform depositions and time preparing and defending Motions. If
3 they court were to grant Defendants any fees in this case they should be limited to
4 the time spent during the 9 days of trial.

5
6 **C. Defendants are not entitled to an award of costs pursuant to NRCP 68 and**
7 **NRS 18.020.**

8 Defendant is not entitled to an award of costs under NRCP 68 for reasons
9 previously described herein. Namely, defendant's offer was not in good faith given
10 the amount and the lack of discovery completed. Defendant's offer was rejected in
11 good faith and the amount requested in fees is not justified under the Beattie
12 factors.

13 NRS 18.005(5) allows for an award of costs for "reasonable fees of not more than
14 five expert witnesses in an amount of not more than \$1,500 for each witness, unless
15 the court allows a larger fee after determining that the circumstances surrounding
16 the expert's testimony were of such necessity as to require the larger fee." Here,
17 Defendants have not shown that a higher fee is warranted.

18 Defendants decided to hire Dr. Segil, an out of state Doctor, to travel to Las Vegas
19 for trial when a local doctor could have provided testimony in this case. Defendants
20 provide no justification for spending the extra money for the time that it would take
21 to have Dr. Segil testify. Similarly, defendants hired Michelle Robbins who billed in
22 excess of \$16K to provide one expert report, two rebuttal reports and to testify at
23 trial. This is an excessive expense that should not be borne by Vivia.

24 Ms. Corwin was hired to rebut Ms. Lustig's report. Ms. Lustig's testimony was used
25 in court to validate the facts that Vivia needed ongoing care and assistance.
26 Defendants could have presented Ms. Corwin at trial to rebut Ms. Lustig's assertions
27 that Vivia needed ongoing care, however, Ms. Corwin happened to agree with Ms.
28

1 Lustig on nearly all accounts with the exception of dollar amounts for some items that
2 Ms. Lustig suggested. It was Defendant's strategic decision not to put Ms. Corwin on
3 the stand to agree with Ms. Lustig. However, it is not Vivia's responsibility to pay the
4 excess time and money spent on Ms. Corwin for Defendant's strategy at trial.

5 If the Court is inclined to award the remaining expert witnesses' costs (Dr. Segil,
6 Michelle Robbins and Ms. Corwin), then such costs should be limited to \$1,500.00
7 each, for a total of \$4,500.00 for expert witnesses pursuant to NRS 18.005(5).

8
9 **1. Defendants not entitled to award of cost against Vivia and her counsel**
10 **jointly and severally.**

11 Defendants make no argument and cite no legal authority that would make Vivia
12 and her counsel jointly and severally liable for an award of costs. Defendants attempt
13 to sneak in a demand for joint and several liability in the Defendant's conclusion
14 without any legal support is another example of the Defendant's lack of forthright
15 participation in this process. Given Defendant's request for joint and several liability
16 for Vivia and her counsel is not supported by argument or law, thier request should
17 be denied.

18

19

IV.

20

Conclusion

21 An award of attorney's fees and costs based on a rejected offer of judgment
22 should be the exception, not the rule. Only when a party acts in bad faith and in a
23 grossly unreasonable manner with respect to its claims and settlement decisions are
24 attorney's fees permissible. Defendants have not made the requisite showing here.
25 During all relevant times, Vivia maintained her claims in good faith. It was not
26 unreasonable, let alone grossly unreasonable, for Vivia to decline to accept
27 Defendants' Offer of Judgment. This Court should deny Defendants' request for
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attorney's fees and costs entirely.

DATED this 4th day of February 2019.

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Certificate of Service

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I hereby certify that on the 4th day of February 2019, service of the foregoing **Opposition to Ramparts, Inc. dba Luxor Hotel & Casino’s Motion for Fees and Costs** was made by required electronic service to the following individuals:

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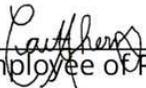
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