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Mar 19 2020 11:13 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

HOWARD SHAPIRO,)	No. 80395
)	
Appellant,)	
)	
vs.)	
)	
GLEN WELT, RHODA WELT, LYNN)	
WELT, and MICHELLE WELT,)	
)	
Respondents,)	

DOCKETING STATEMENT

COMES NOW, Appellant Howard Shapiro, (hereinafter referred to as "Appellant"), by and through his attorney of record, ALEX B. GHIBAUDO, ESQ., of the law firm of ALEX B. GHIBAUDO, P.C., and hereby submit the following docketing statement pursuant to NRAP 14 et seq.

1. This is an appeal from a judgment rendered in the Eighth Judicial District Court, County of Clark, Department 27, Judge Nancy Alf, Case No. A-14-706566-C.
2. Attorney filing this docketing statement: Alex B. Ghibauda, Esq., of the law firm Alex B. Ghibauda, PC, located at 703 S. 8th Street, Las Vegas, Nevada 89101, phone no. 702-978-7090, client Howard Shapiro.

- 1 3. Attorney representing respondents is Michael P. Lowry, Esq., telephone no. 702-727-1400,
2 300 S. 4th Street, 11th Floor, Las Vegas, Nevada 89101, clients are Glen Welt, Rhonda
3 Welt, Lynn Welt and Michelle Welt.
- 4 4. Nature of disposition below: On December 23, 2019 the district court issued an order
5 awarding Respondents' attorney's fees and costs pursuant to NRS 41.670 despite the fact
6 that Appellant prevailed in the anti-SLAPP matter for which Respondent was awarded
7 those fees.
- 8 5. This appeal does not raise issues of child custody, venue, or termination of parental rights.
- 9 6. Prior proceedings in this Court is Supreme Shapiro v. Welt and Welt v. Shapiro, Court
10 Docket No. 67363, 67596, and 73943.
- 11 7. There are other pending proceedings in other courts related to this matter: Case No. A-14-
12 706566-C remains in progress despite timely filing a notice of appeal. An arbitration
13 hearing is currently set for May 14, 2020 at 7:00 a.m.
- 14 8. On July 10, 2019, the district court denied Respondents' Special Motion to Dismiss made
15 pursuant to NRS 41.660 et seq., Nevada's anti-SLAPP statute. Despite that, on December
16 23, 2019 the district court awarded Respondents attorney's fees and costs pursuant to NRS
17 41.670(1) for the same action. This appeal follows.
- 18 9. Issues on appeal:
 - 19 a. Did the district court commit legal error or abuse its discretion when it awarded
20 Respondents' attorney's fees and costs under NRS 41.670 after denying
21 Respondents' Special Motion to Dismiss under NRS 41.660?
- 22 10. The following cases pending in this Court raising the same or similar issues are the
23 following:
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- a. ABRAMS VS. SANSON, Case No. 73838
 - b. VETERANS IN POLITICS INT'L, INC. VS. WILLICK, Case No. 7278
 - c. CURTIS VS. DAVIDSON, Case No. 78157.
11. This appeal does not challenge the constitutionality of any statute.
 12. This case concerns an issue of public policy, a substantial issue of first impression, issue related to free speech under the 1st Amendment to the United States Constitution and the Nevada Constitution, and an issue where en banc consideration is necessary to maintain uniformity of the Court's decisions. The case involves the interpretation of Nevada's Anti-SLAPP statute, the proper application of the same, and free speech and its limits.
 13. This Court has already determined that this matter should be retained in the Nevada Supreme Court because of the constitutional law issues raised, the issue of free speech, and the fact that this is a matter of first impression.
 14. This matter did not proceed to trial.
 15. I do not intend to file a motion to disqualify any justice.
 16. Date of entry of written judgment or order appealed from is December 23, 2019.
 17. Date written notice of entry of judgment or was served by electronic means on December 26, 2019.
 18. Time for filing the notice of appeal was not tolled by a post-judgment motion.
 19. Notice of Appeal was filed on January 6, 2020.
 20. NRAP 4(a) is the rule governing the time limit for filing any notice of appeal.
 21. NRS 41.670(4) is the rule or authority granting this Court jurisdiction to review the judgment or order appealed from. This rule provides the basis for appeal because it allows for interlocutory appeals for decisions made on the basis of the rule.

1 22. The following are all parties involved: Howard and Jenna Shapiro vs. Glen Welt, Rhoda
2 Welt, Lynn Welt, Michelle Welt. Though Checksnet.com was originally a party to the case
3 in the court below it is not a party on the appeal. Checksnet.com was voluntarily dismissed
4 per NRCP 41 on February 2, 2015. Jenna Shapiro voluntarily dismissed her case against
5 the Welts on July 10, 2019.

6
7 23. The nature of the Shapiros' claim is in the nature of defamation.

8 24. The judgment or order from the court below did not adjudicate all the claims alleged and
9 the rights and liabilities of all the parties.

10 25. The claims remaining below are Defamation and Defamation per se.

11 26. Howard Shapiro, Glen Welt, Rhoda Welt, Lynn Welt, and Michelle Welt remain parties to
12 the case.

13
14 27. The district court did not certify the judgment as final.

15 28. The challenged order is appealable under NRS 41.670(4).

16 29. Attachments:

17 a. Respondents' motion for attorney's fees and costs;

18 b. Appellant's opposition to that motion;

19 c. Respondents' reply to that opposition;

20 d. The district court's order awarding Respondents' attorney's fees and costs, and
21 notice of entry of that order; and
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1 e. Appellant's notice of appeal.

2 DATED this 19th day of March, 2020.

3 ALEX B. GHIBAUDO, P.C.

4 By: /s/ Alex B. Ghibaud, Esq.

5 Alex B. Ghibaud, Esq.

6 Nevada Bar No.: 010592

7 Attorney for Appellants

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11 **VERIFICATION**

12 I declare under penalty of perjury that I have read this docketing statement, that
13 the information provided in this docketing statement is true and complete to the
14 best of my knowledge, information and belief, and that I have attached all required
15 documents to this docketing statement.
16

17
18
19 Howard Shapiro

Alex B. Ghibaud, Esq.

20 _____
Name of Appellants

Name of Counsel of Record

21 March 19, 2020

/s/ Alex Ghibaud

22 _____
Dated

Signed

23
24 Clark County, Nevada

25 _____
State and County where signed

CERTIFICATE OF ELECTRONIC SERVICE

I certify that on the 19th day of March, 2020, I served a copy of this completed docketing statement upon all counsel of record and the Settlement Judge appointed to this matter, William Turner, electronically through the Court's eflex filing service and by email to the following:

Michael P. Lowery, Esq.
WILSON ELSER MOSKOWITZ, EDELMAN & DICKER, LLP
300 South 4th Street, 11th Floor
Las Vegas, Nevada 89101
Michael.Lowry@wilsonelser.com
Attorneys for Respondents

William Turner, Esq.
59 Oak Marsh Dr.
Henderson, NV, 89074
billtlaw@cox.net
Settlement Judge

Dated this 19th Day of March, 2020.

/s/ Alex Ghibauda, Esq.

Signature

EXHIBIT A



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

DISTRICT COURT
CLARK COUNTY, NEVADA

HOWARD SHAPIRO and JENNA SHAPIRO, Case A-14-706566-C
Dept. 27

Plaintiffs,

vs.

**Glenn Welt, Rhoda Welt, Lynn Welt &
Michele Welt's Motion for Fees, Costs, and
Discretionary Relief**

GLEN WELT, RHODA WELT, LYNN WELT,
MICHELLE WELT, individuals;
CHECKSNET.COM, a corporation; DOES I
through X, and ROE CORPORATIONS I
through X, inclusive,

Hearing Requested

Defendants.

If an anti-SLAPP special motion to dismiss is granted, the court "shall award reasonable costs and attorney's fees to the person against whom the action was brought..."¹ The Welts' filed such a motion to dismiss. Jenna Shapiro did not oppose it. Howard Shapiro did not oppose it as to four of his six causes of action. The motion was granted on those points and denied as to the remainder. The Welts now request attorneys' fees on those parts that were granted.

The Welts also request a discretionary award against both Jenna and Howard. They did not oppose the motion to dismiss on areas noted above. The Welts spent nearly five years litigating those points, advancing the same position consistently throughout. The Shapiros spent almost five years pursuing claims they couldn't support. That is exactly the type of conduct NRS 41.660 is intended to deter.

///

¹ NRS 41.660(1)(a).

1 DATED this 15th day of August, 2019.



3
4 BY: /s/ Michael P. Lowry
MICHAEL P. LOWRY
Nevada Bar No. 10666
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt
8

9
10 **DECLARATION OF MICHAEL LOWRY**

11 Exhibits 1-5 are billing and cost records concerning this lawsuit. The statements were
12 prepared at my direction, I have reviewed them, and they accurately reflect all fees and costs the
13 Welts have incurred through this motion. These fees reflect a reasonable charge for the services
14 provided and were necessarily incurred. The statements have been partially redacted to protect
15 attorney-client and attorney work product privileges.

16 I declare under penalty of perjury that the foregoing is true and correct, per NRS
17 53.045(1).

18 DATED this 15th day of August, 2019.

19 /s/ Michael P. Lowry
MICHAEL P. LOWRY, ESQ.
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1 **Memorandum of Points & Authorities**

2 **I. NRS 41.670(1)(a) is unambiguous and requires an award of all reasonable fees.**

3 “If the court grants a special motion to dismiss filed pursuant to NRS 41.660: (a) The
4 court shall award reasonable costs and attorney’s fees to the person against whom the action was
5 brought....”² Here, the Welts filed a special motion to dismiss. That motion was granted in full
6 as to Jenna Shapiro. It was granted as to four of Howard’s six causes of action. As a result, an
7 award of reasonable costs and fees is mandated on those parts that were granted.

8 In the past, the Shapiros have argued only certain fees are recoverable. The court has
9 previously rejected that argument because NRS 41.670(1)(a) contains no language limiting the
10 award of attorney’s fees to those within certain categories. For instance, if the Legislature had
11 wished to limit the categories of recoverable fees, NRS 41.670(1)(a) could have mirrored
12 Guam’s anti-SLAPP statute. If a Guam court grants an anti-SLAPP motion to dismiss, it shall
13 award the “costs of litigation, including reasonable attorney and expert witness fees, incurred in
14 connection with the motion....”³ NRS 41.670(1)(a) contains no similar restriction. Even had it,
15 Guam’s limiting language is broadly interpreted to include far more than merely drafting and
16 arguing the motion itself.⁴

17 **a. If NRS 41.670 is ambiguous, Legislative intent requires an award of all**
18 **reasonable attorneys’ fees.**

19 “If the statutory language fails to address the issue, this court construes the statute
20 according to that which reason and public policy would indicate the legislature intended.”⁵ “The
21 Legislature’s intent is the primary consideration when interpreting an ambiguous statute.”⁶
22 “When construing an ambiguous statutory provision, this court determines the meaning of the

23 ² NRS 41.670(1)(a).

24 ³ 7 Guam Code § 17106(g)(1) (2014).

25 ⁴ *Enriquez v. Smith*, 2015 Guam 29, ¶ 34 (“Smith’s initial appeal arguing that the trial court be
26 compelled to address her anti-SLAPP motion on the merits, as well as her defense of the appeal
27 in the present case are certainly covered by the statutory mandate. Additionally, because the
28 award of attorney’s fees and sanctions are a mandatory result of success on a CPGA motion,
Smith’s counterclaims regarding these issues are also sufficiently connected to her motion to
warrant compensation for preparation of these arguments.”).

⁵ *Hardy Cos. v. SNMARK, LLC*, 126 Nev. Adv. Op. 49, 245 P.3d 1149, 1153 (2010) (quotation
and citation omitted).

⁶ *Id.*

1 words used in a statute by examining the context and the spirit of the law or the causes which
2 induced the legislature to enact it.”⁷

3 The Supreme Court has previously discussed the Legislature’s intent in enacting
4 Nevada’s anti-SLAPP statutes. The Court concluded “[a] SLAPP suit is a meritless lawsuit that
5 a party initiates primarily to chill a defendant’s exercise of his or her First Amendment free
6 speech rights.”⁸ “The hallmark of a SLAPP lawsuit is that it is filed to obtain a financial
7 advantage over one’s adversary by increasing litigation costs until the adversary’s case is
8 weakened or abandoned.”⁹ “When amending Nevada’s anti-SLAPP statute in 1997, the
9 Legislature explained that SLAPP lawsuits abuse the judicial process by chilling, intimidating,
10 and punishing individuals for their involvement in public affairs.”¹⁰ “The Legislature further
11 reasoned that the number of SLAPP lawsuits in Nevada had increased, and therefore,
12 implementation of an anti-SLAPP statute was essential to protect citizens’ constitutional
13 rights.”¹¹

14 “The hallmark of a SLAPP lawsuit is that it is filed to obtain a financial advantage over
15 one’s adversary by increasing litigation costs until the adversary’s case is weakened or
16 abandoned.”¹² If NRS 41.670(1)(a) is interpreted to restrict a successful defendant to recovering
17 only those attorney’s fees in specific categories of work, a financial motivation would still exist
18 to file the SLAPP lawsuit to gain a financial advantage. The defendants, who should never have
19 been sued, would still be forced to spend money on attorney’s fees defending themselves from a
20 non-meritorious lawsuit but only a fraction of those fees are recoverable. This is precisely what
21 occurred here as to Jenna Shapiro and four of Howard’s six causes of action. Reading a
22 limitation into what fees are recoverable is contrary to the Legislature’s stated intent of
23 protecting its citizens’ ability to participate in public affairs.

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25
26 ⁷ *Id.* (quotation and citation omitted).

27 ⁸ *Stubbs v. Strickland*, 129 Nev. Adv. Op. 15, 297 P.3d 326, 329 (2013) (citations omitted).

28 ⁹ *John v. Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 752, 219 P.3d 1276, 1280 (2009)..

¹⁰ *Id.*, 219 P.3d at 1281 (*citing* 1997 Nev. Stat., ch. 387, preamble, at 1364).

¹¹ *Id.*

¹² *Id.*, 219 P.3d at 1280.

1 **b. The Welts may also recover their reasonable attorneys' fees and costs**
2 **incurred on the appeals.**

3 The Welts' also request their attorneys' fees and costs incurred on the prior appeals in
4 this case. Multiple courts construing anti-SLAPP fee shifting statutes have concluded the
5 prevailing defendants may also recover their reasonable attorney's fees and costs incurred
6 appealing a ruling on an anti-SLAPP motion. In Guam, "the trial court erred in denying Smith's
7 request for attorney's fees associated with the appeal..."¹³ Multiple state and federal courts
8 interpreting California's anti-SLAPP statute have reached the same conclusion.¹⁴ Washington¹⁵
9 and Oregon¹⁶ have also ruled this way.

10 These conclusions are consistent with NRS 41.670(1)(a), as it contains no language
11 excluding reasonable costs and attorneys' fees on appeal from the award.

12 **II. The Welts request \$32,156.61 from Jenna and \$21,435.60 from Howard.**

13 Applied here, the Welts have incurred total fees of \$62,906, and total costs of \$1,407.22.
14 There were two plaintiffs, so the Welts divide those totals in half. As the motion was granted in
15 full as to Jenna Shapiro, the Welts request the court award a judgment against her totaling
16 \$32,156.61, which is her 50% share of the fees and costs incurred.

17 As to Howard Shapiro, he did not oppose the motion as to four of his six causes of action.
18 The Welts thus request the court award them $\frac{2}{3}$ of Howard's 50%. Howard's 50% is also
19 \$32,156.61, $\frac{2}{3}$ of that is \$21,435.60.

20 **a. The total fees and costs incurred.**

21 Michael Lowry has been the Welts' lead counsel since the case started. When it started,
22 Mr. Lowry was an attorney with Thorndal Armstrong Delk Balkenbush & Eisinger. While Mr.
23 Lowry was there, the Welts incurred 121.9 hours of time, at an hourly rate of \$250.00, for a total
24

25 ¹³ *Enriquez*, 2015 Guam at ¶ 35.

26 ¹⁴ *Manufactured Home Communities, Inc. v. Cnty. of San Diego*, 655 F.3d 1171, 1181 (9th Cir. 2011); *Metabolife Int'l, Inc. v. Wornick*, 213 F. Supp. 2d 1220, 1222 (S.D. Cal. 2002); *Dove Audio, Inc. v. Rosenfeld, Meyer & Susman*, 54 Cal. Rptr. 2d 830, 835 (App. 1996).

27 ¹⁵ "[W]here a prevailing party is entitled to attorney fees below, they are entitled to attorney fees if they prevail on appeal." *Davis*, 325 P.3d at 275.

28 ¹⁶ *Northon v. Rule*, 637 F.3d 937 (9th Cir. 2011) (applying ORS § 31.152(3) and permitting attorneys' fees for appeal).

1 fee of 30,475.00.¹⁷ The Welts were also assessed \$1,101.90 for both district and appellate court
2 filing fees.¹⁸ All of the costs listed are for actual filings that can be verified against both court
3 systems' dockets.

4 In July, 2016, Mr. Lowry joined the Wilson Elser Moskowitz Edelman & Dicker law
5 firm. Mr. Lowry's hourly rate remained \$250 per hour through December 31, 2017, then
6 changing to \$265 per hour on January 1, 2018. Since then and through this motion he has spent
7 115.3 hours on the case, for a total charge of \$29,441.50.¹⁹ Mr. Lowry has also been assisted by
8 associate Amanda A. Ebert. Ms. Ebert has spent 13.2 hours working on this matter and her rate
9 adjusted from \$225 an hour to \$240 an hour on January 1, 2018. The combined fee for her time
10 totals \$2,989.50.

11 The Welts have incurred court filing costs of \$301.82, through August 15, 2019.²⁰
12 Missing from the cost report is the \$3.50 e-filing charge for this motion, increasing the total to
13 \$305.32.

14 **b. The Welts satisfy the *Brunzell* factors.**

15 NRS 41.670(1)(a) permits an award of only "reasonable" attorney's fees. *Brunzell v.*
16 *Golden Gate Nat. Bank* provides the analysis by which to evaluate if the attorneys' fees were
17 reasonable. *Brunzell* requires district courts to consider at least four factors.

- 18 (1) the qualities of the advocate: his ability, his training, education, experience,
19 professional standing and skill;
20 (2) the character of the work to be done: its difficulty, its intricacy, its importance,
21 time and skill required, the responsibility imposed and the prominence and
22 character of the parties where they affect the importance of the litigation;
23 (3) the work actually performed by the lawyer: the skill, time and attention given
24 to the work;
25 (4) the result: whether the attorney was successful and what benefits were
26 derived.²¹

27 *Brunzell* provides the district court with a method to evaluate whether the attorney's fees
28 requested are appropriate for the facts and circumstances of the individual case. They are

26 ¹⁷ Redacted billing records attached as Exhibit 1.

27 ¹⁸ *Id.* at 28-29; Cost receipts attached as Exhibit 2.

28 ¹⁹ Redacted billing records attached as Exhibit 3.

²⁰ Cost itemization and receipts attached as Exhibit 4.

²¹ *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

1 designed to protect opposing parties from exorbitant rates from less qualified lawyers, dubious
2 billing activities, or poor quality work. The court previously addressed these factors in its two
3 prior orders granting attorneys' fees to the Welts. The analysis remains largely the same.

4 The Welts' lead counsel, Michael Lowry, is a licensed attorney practicing in Nevada
5 since 2007 and has represented the Welts since this case was filed. His rate for this matter
6 started at \$250 rate in 2014, and increased to \$265 on January 1, 2018. Associate Amanda Ebert
7 has practiced in Nevada since 2012 and billed at \$225 an hour until the rate changed to \$240 an
8 hour on January 1, 2018. This rate reflects their differing experience levels.

9 As the court found in its February 20, 2015 order, "[t]he character of the work done was
10 intricate, and required research into a developing area of law."²² This analysis still applies. This
11 case has been appealed twice. During those appeals, the law in this area changed repeatedly.
12 This analysis also satisfies the third *Brunzell* factor as the work actually performed reflects a
13 level of skill, time, and attention that matches the intricate nature the analysis that was required.

14 Finally, the fourth factor is also satisfied. The Welts' position was successful as to all but
15 two causes of action. The decision benefitted the Welts by terminating Jenna's claims against
16 them and narrowing the scope of Howard's.

17 **a. Filing costs are expressly recoverable.**

18 The \$1,407.22 for court filing fees that have been incurred are expressly recoverable.
19 NRS 18.005(1) defines the term "costs" to include clerks' fees.

20 **III. A discretionary award is also merited.**

21 The relief available when a special motion to dismiss is granted is not limited to
22 attorneys' fees and costs. "The court may award, in addition to reasonable costs and attorney's
23 fees awarded pursuant to paragraph (a), an amount of up to \$10,000 to the person against whom
24 the action was brought."²³ Texas has a similar statute. There, the purpose and amount of this
25 discretionary award should be "sufficient to deter the party who brought the legal action from
26 bringing similar actions described in this chapter."²⁴ An award is merited here.

27 ²² Order at 2:1-2.

28 ²³ NRS 41.660(1)(b).

²⁴ Texas Civil Practice and Remedies Code § 27.009(a)(2).

1 **a. Jenna Shapiro sued the Welts for a factual statement she agrees is accurate.**

2 As to Jenna Shapiro, the Welts have argued since December, 2014 that her claims should
3 be dismissed because that the only factual statement about her on the disputed website was that
4 she was married to Howard.²⁵ Jenna never argued that fact was wrong, nor did the Welts'
5 position ever change. Despite that, she pursued her claims against the Welts for years before
6 finally not opposing the third motion to dismiss.²⁶

7 She sued the Welts for accurately stating the fact she is married to Howard. She then
8 pursued that claim for almost five years before simply giving it up. That type of conduct is
9 exactly what NRS 41.660 is intended to deter. It merits a discretionary award of \$10,000 to each
10 of the Welts.

11 **b. Howard dropped four of his causes of action for reasons the Welts have**
12 **argued since December, 2014.**

13 Howard's complaint alleged four causes of action: 1) defamation per se; 2) defamation;
14 3) extortion; 4) civil conspiracy; 5) fraud; and 6) punitive damages. After the Welts filed their
15 third motion to dismiss, Howard conceded all causes of action except defamation per se and civil
16 conspiracy.²⁷

17 The Welts have argued since December, 2014 that all of these claims failed for multiple
18 reasons. They have argued defamation could not survive for multiple factual reasons.²⁸ They
19 have long noted extortion is not a civil cause of action.²⁹ They always objected that the
20 complaint failed to properly plead a "fraud" cause of action.³⁰ Finally, they have always noted
21 that "punitive damages" is not an independent cause of action.³¹

22 Howard never conceded any of these points for nearly five years. His refusal to concede
23 them led to nearly five years of litigation and two appeals. This unnecessarily increased the fees
24

25 ²⁵ December 15, 2014 Motion to Dismiss at 10:14-19.

26 ²⁶ July 9, 2019 opposition at 10:2-3.

27 ²⁷ July 9, 2019 opposition at 10:3-4.

28 ²⁸ December 15, 2014 Motion to Dismiss at 10:11-17:10.

²⁹ *Id.* at 17:11-18:20.

³⁰ *Id.* at 20:4-21:23.

³¹ *Id.* at 22:1-6.

1 and costs related to this litigation for claims Howard had no basis to bring. It too It merits a
2 discretionary award of \$10,000 to each of the Welts.

3 **IV. Judgments against the Shapiros are merited.**

4 This case has a long procedural history already that supports the fees and costs incurred.

5 A total judgment should be entered as follows:

- 6 • Jenna Shapiro, individually: \$32,156.61 (Fees & Costs)
- 7 • Jenna Shapiro, individually: \$10,000 to Glenn Welt, Rhoda Welt, Lynn Welt, and
8 Michele Welt, each, per NRS 41.660(1)(b).
- 9 • Howard Shapiro, individually: \$21,435.60 (Fees & Costs)
- 10 • Howard Shapiro, individually: \$10,000 to Glenn Welt, Rhoda Welt, Lynn Welt, and
11 Michele Welt, each, per NRS 41.660(1)(b).

12 DATED this 15th day of August, 2019.



14
15 BY: /s/ Michael P. Lowry
16 MICHAEL P. LOWRY
17 Nevada Bar No. 10666
18 300 South 4th Street, 11th Floor
19 Las Vegas, NV 89101-6014
20 Tel: 702.727.1400/Fax: 702.727.1401
21 Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
22 Michelle Welt
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☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

BY: /s/ Cynthia Kelley
An Employee of
WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP

Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion
for Attorneys' Fees & to Amend Order Granting Summary
Judgment

A-14-706566-C

Exhibit 1

Thorndal Armstrong Billing Records

WELTG-SHAPIRO
Glenn Welt

CURRENT PERIOD AND HISTORY PRE-BILLING LEDGER

Run On 07/25/17

Bill to: Glenn Welt
35 E. Horizon Ridge Pkwy.
Suite 110-48
Henderson NV 89002

Client Attorney Michael P. Lowry
Client Type 1 Commercial (gen bus/breach)
Office Las Vegas

Resp Atty 1 Michael P. Lowry
Case Type 1 Commercial (gen bus/breach)
Department Las Vegas Cases

Status Code 1 X Alternate Billing Format IV3
Finance Charges N Fee BCC M Cost BCC M
Sales Tax None
Retainer Acct Min 0 No auto transfers chosen
Unbilled only N

HOLD: _____ COMMENTS: _____
BILL: _____
(with corrections)
FINAL BILL ?? _____ CLOSE FILE ?? _____

Re: Glen Welt; Lynn Welt; Michelle Welt;
Rhoda Welt; Checksnet.com adv.
Howard Shapiro; Jenna Shapiro

===== FEES FEES =====

Date	Emp	Hours	Dollars	Gp	
09/15/14	MPL	0.30	75.00	B P	Telephone call with Glenn Welt re facts of case and scope of retention.
09/16/14	MPL	0.20	50.00	B P	Telephone call with Glenn Welt re strategy of
09/18/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/19/14	MPL	0.20	50.00	B P	Telephone call with Glenn Welt re implications of
09/22/14	MPL	0.30	75.00	B P	Draft correspondence to Glenn Welt re strategy of f
09/22/14	MPL	0.20	50.00	B P	Draft correspondence to Alex Ghibaudo re representing Welts, service of process and anti-SLAPP motion.
09/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re status of NJ hearing.
09/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Lynn Welt re
09/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re adding

Date	Emp	Hours	Dollars	Gp	
09/22/14	MPL	0.20	50.00	B P	Analysis of correspondence from Glenn Welt re service of process and H
09/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/22/14	MPL	0.20	50.00	B P	Draft correspondence to Alex Ghibauda re lack of jurisdiction over clients, insisting on service of process and applying anti-SLAPP to case.
09/23/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
09/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt re persuading
09/23/14	MPL	0.10	25.00	B P	Draft correspondence to Michele Welt re probability of
09/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re any
09/23/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
09/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt re
09/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt requesting
09/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/24/14	MPL	0.10	25.00	B P	Analysis of more correspondence from Glenn Welt re circumstances
09/24/14	MPL	0.40	100.00	B P	Draft correspondence to Glenn Welt re
09/24/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy of
09/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt re

Date	Emp	Hours	Dollars	Gp	
09/24/14	MPL	0.10	25.00	B P	Draft correspondence to Michele Welt re potential pros/cons
09/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt re
09/25/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re anticipated
09/25/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re anticipated h
09/25/14	MPL	0.10	25.00	B P	Draft correspondence to Michele Welt re timeline
09/25/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re alternative
09/25/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy
09/25/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy
09/25/14	MPL	0.10	25.00	B P	Analysis of correspondence from Michele Welt re
09/25/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt approving
09/26/14	MPL	0.10	25.00	B P	Draft initial appearance fee disclosure for Rhoda & Lynn.
09/26/14	MPL	0.10	25.00	B P	Draft NRS 18.130 demand for security of costs for Rhoda & Lynn.
09/27/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
09/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt
09/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt
10/01/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
10/01/14	MPL	0.10	25.00	B P	Telephone call with Glenn Welt re
10/01/14	MPL	0.10	25.00	B P	Draft NRCP 7.1 disclosure for judicial conflict check.

Date	Emp	Hours	Dollars	Gp	
10/02/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/03/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/03/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re possibility of .
10/04/14	MPL	5.80	1,450.00	B P	Begin drafting motion to dismiss for Rhoda & Lynn. Draft detailed factual section and begin preparing declarations re jurisdictional facts. Begin drafting argument that Nevada lacks either general or specific jurisdiction over them due to lack of contacts with state. Begin drafting section of motion that explains to court the basis of Nevada's anti-SLAPP statutes and the standard of review for these motions.
10/05/14	MPL	5.20	1,300.00	B P	Continue drafting motion to dismiss for Rhoda and Lynn. Draft section arguing that if they made any statements that were repeated on the website, these statements were protected communications for the purpose of the anti-SLAPP statute and argue Shapiro's lack of clear and convincing evidence to demonstrate a probability of success on the merits.
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re proposed .
10/06/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt asking if .
10/06/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re advice .
10/06/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re edits .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Lynn Welt re .
10/06/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re basis for

Date	Emp	Hours	Dollars	Gp	
10/07/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re procedure for .
10/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re merits of m .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy options .
10/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re merits of .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt correcting instructions .
10/08/14	MPL	0.40	100.00	B P	Draft correspondence to Glenn Welt re potential impact of .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of m .
10/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re can file .
10/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt confirming instructions .
10/09/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/09/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re timing for .
10/09/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re anticipated timing for .
10/10/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/10/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .

Date	Emp	Hours	Dollars	Gp	
10/10/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re no knowledge of
10/13/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
10/13/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re o
10/13/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re ability to
10/13/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re not yet able to
10/13/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re instructions to
10/13/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy for
10/13/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to
10/13/14	MPL	0.10	25.00	B P	Draft NRS 18.130 demand for security of costs for Glenn & Michele
10/13/14	MPL	0.10	25.00	B P	Draft initial appearance fee disclosure for Glenn & Michele.
10/13/14	MPL	0.10	25.00	B P	Draft NRCP 7.1 disclosure statement for Glenn & Michele.
10/14/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re possibility that
10/14/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re merits of
10/14/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re options for
10/14/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to
10/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re status of
10/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re

Date	Emp	Hours	Dollars	Gp	
10/17/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/28/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
10/29/14	MPL	0.30	75.00	B P	Draft correspondence to Glenn Welt re .
10/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re details of .
10/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re meaning of .
10/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
10/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
11/07/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re whether .
11/07/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
11/13/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re no .
11/14/14	MPL	0.40	100.00	B P	Finalize motion to dismiss for failure to post security of costs by deadline.
11/14/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
11/17/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re requirement t .
11/17/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
11/18/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of .

Date	Emp	Hours	Dollars	Gp	
11/18/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re considerations for .
11/18/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re pursuing strategy of .
11/18/14	MPL	0.20	50.00	B P	Draft correspondence to Glenn Welt re advising .
11/18/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
11/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
11/19/14	MPL	0.20	50.00	B P	Legal analysis of 4 cost bonds filed for Howard and Jenna Shapiro.
11/19/14	MPL	0.20	50.00	B P	Draft correspondence to Glenn Welt explaining .
11/19/14	MPL	0.10	25.00	B P	Draft correspondence to Evan Schwab re failure to serve cost bonds.
11/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
11/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of .
11/19/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re advising on strategy .
11/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re will .
12/01/14	MPL	0.10	25.00	B P	Analysis of correspondence from Evan Schwab re cost bonds and requesting that motion to dismiss be withdrawn.
12/01/14	MPL	0.10	25.00	B P	Draft correspondence to Evan Schwab re cost bonds did not meet minimum demanded and declining to withdraw motion to dismiss.
12/01/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/01/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re updates to .

Date	Emp	Hours	Dollars	Gp	
12/01/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re updates
12/01/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
12/02/14	MPL	0.10	25.00	B P	Telephone call with Evan Schwab re basis for \$4,000 demand for security.
12/03/14	MPL	0.10	25.00	B P	Draft correspondence to Evan Schwab re file-stamped copies of demands for security for each defendant.
12/04/14	MPL	0.20	50.00	B P	Legal analysis of Shapiros' opposition to motion to dismiss.
12/04/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re impact of
12/04/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re impact of
12/04/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
12/04/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
12/04/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
12/05/14	MPL	0.20	50.00	B P	Draft correspondence to Glenn Welt answering various questions about
12/05/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of
12/06/14	MPL	1.90	475.00	B P	Draft reply supporting motion to dismiss per NRS 18.130.
12/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of
12/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategic considerations for
12/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re timing of
12/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re

Date	Emp	Hours	Dollars	Gp	
12/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re further thoughts on .
12/08/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re understand instructions to w .
12/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re potential of .
12/08/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re potential .
12/10/14	MPL	0.20	50.00	B P	Finalize and file reply re NRS 18.130 motion to dismiss.
12/10/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/10/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/10/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/11/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy of .
12/11/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/11/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/11/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/11/14	MPL	2.60	650.00	B P	Resume drafting anti-SLAPP motion to dismiss; analysis of whether Howard Shapiro is a public figure for purposes of defamation analysis.
12/12/14	MPL	0.10	25.00	B P	Legal analysis of second set of cost bonds.
12/12/14	MPL	0.10	25.00	B P	Analysis of correspondence from Evan Schwab re second set of cost bonds and withdrawing motion to dismiss for lack of them.
12/12/14	MPL	0.10	25.00	B P	Draft correspondence to Evan Schwab re improper service of second set of cost bonds.
12/12/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re additional .

Date	Emp	Hours	Dollars	Gp	
12/12/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re additional .
12/12/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re additional .
12/12/14	MPL	1.20	300.00	B P	Resume drafting anti-SLAPP motion to prepare for 12/15 filing.
12/12/14	MPL	0.10	25.00	B P	Legal analysis of Shapiros' supplemental opposition.
12/15/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re notice of .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re notice of .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/15/14	MPL	0.20	50.00	B P	Telephone call with Glenn Welt re .
12/15/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/15/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re obtaining .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re filing .
12/15/14	MPL	7.30	1,825.00	B P	Continue drafting anti-SLAPP motion to dismiss noting that Howard Shapiro is a public figure for purposes of the conservatorship proceedings and must show actual malice to prevail on Nevada defamation claims.
12/15/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re locating .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/15/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of a .
12/15/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re able to .
12/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re

Date	Emp	Hours	Dollars	Gp	
12/16/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re ?
12/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt containing .
12/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re reasons .
12/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re no .
12/16/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re not .
12/16/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/17/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/17/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re documentation that .
12/17/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re which .
12/17/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re need .
12/18/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re impact of .
12/18/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re updated .
12/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re opposition to anti-SLAPP motion.
12/19/14	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re inappropriate service of opposition to anti-SLAPP motion.
12/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo acknowledging inappropriate service of opposition to anti-SLAPP motion.
12/19/14	MPL	0.30	75.00	B P	Analysis of correspondence from Shapiros' opposition to anti-SLAPP motion.
12/19/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .

Date	Emp	Hours	Dollars	Gp		
12/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/19/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re removing	.
12/19/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of r	?
12/19/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re	.
12/19/14	MPL	5.20	1,300.00	B P	Draft reply supporting anti-SLAPP motion.	
12/20/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/22/14	MPL	0.10	25.00	B P	Legal analysis of Lynn Welt's	.
12/22/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re	.
12/22/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/23/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re	.
12/24/14	MPL	2.40	600.00	B P	Prepare oral argument for court re merits of anti-SLAPP motion.	
12/24/14	MPL	1.40	350.00	B P	Attend court hearing re anti-SLAPP motion.	
12/24/14	MPL	0.20	50.00	B P	Draft correspondence to Glenn Welt re minutes of court hearing on anti-SLAPP motion and	.
12/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re obtaining	.
12/24/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re preserving	.
12/24/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re obtaining	.

Date	Emp	Hours	Dollars	Gp	
12/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re attempts to .
12/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re attempts to .
12/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re anticipated .
12/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re updated .
12/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re time .
12/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re time .
12/29/14	MPL	0.10	25.00	B P	Legal analysis of NJ order resolving conservatorship.
12/29/14	MPL	0.10	25.00	B P	Draft supplemental brief re NJ order resolving conservatorship.
12/29/14	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re need to .
12/29/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/30/14	MPL	0.10	25.00	B P	Telephone call with Alex Ghibaudo re status of court's ruling.
12/31/14	MPL	0.20	50.00	B P	Legal analysis of order granting anti-SLAPP motion.
12/31/14	MPL	0.30	75.00	B P	Draft correspondence to Glenn Welt analyzing .
12/31/14	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re interpretation of .
01/02/15	MPL	0.10	25.00	B P	Per local rules, draft notice of entry of order granting anti-SLAPP motion.
01/02/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re notice of entry on order granting anti-SLAPP motion.
01/05/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re using

Date	Emp	Hours	Dollars	Gp	
01/05/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re collecting
01/05/15	MPL	0.60	150.00	B P	Draft affidavit detailing fees and costs recoverable per court order and statute.
01/05/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re potential strategy of d
01/05/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re potential strategy of
01/05/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re potential dismissal of Rhoda, Michele and Lynn.
01/05/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re anticipated
01/05/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re anticipated
01/06/15	MPL	0.20	50.00	B P	Telephone call with Glenn Welt re potential for
01/06/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re Shapiros intend to appeal ruling.
01/07/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re need to dismiss Checksnet.com before appeal is possible.
01/07/15	MPL	0.30	75.00	B P	Draft correspondence to Glenn Welt re
01/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re intent to
01/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
01/08/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
01/08/15	MPL	0.10	25.00	B P	Legal analysis of substitution of attorneys.
01/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re meaning of

Date	Emp	Hours	Dollars	Gp	
01/08/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
01/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re proposed
01/08/15	MPL	0.20	50.00	B P	Draft correspondence to Glenn Welt re proposed changes
01/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re probability of
01/08/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re low probability
01/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re revised
01/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re direct communications between Glenn Welt and Howard Shapiro.
01/08/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re direct communications between Glenn Welt and Howard Shapiro; appeal procedurally invalid.
01/08/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
01/09/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re impact of
01/09/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re court's
01/09/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re failed
01/09/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re arguments i
01/10/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re additional support
01/10/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re potential
01/12/15	MPL	0.60	150.00	B P	Draft correspondence to Glenn Welt analyzing options for

Date	Emp	Hours	Dollars	Gp	
01/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re could ?
01/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re viability of .
01/16/15	MPL	0.10	25.00	B P	Legal analysis of Shapiros' opposition to request for fees.
01/16/15	MPL	0.40	100.00	B P	Draft reply supporting affidavit for judgment; address reasonableness of fees and costs.
01/16/15	MPL	0.20	50.00	B P	Telephone call with Evan Schwab re Rule 41 dismissal for Checksnet.
01/20/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re pending .
01/20/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
01/20/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re requesting .
01/21/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
01/30/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re Rule 41 dismissal of Checksnet.
01/30/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re Rule 41 dismissal.
01/31/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re stipulation to dismiss v. Rule 41 dismissal.
02/03/15	MPL	0.10	25.00	B P	Analysis of Shapiros' Rule 41 dismissal of Checksnet.
02/03/15	MPL	0.10	25.00	B P	Analysis of Shapiros' notice of appeal.
02/03/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re meaning of .
02/03/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt explaining meaning of .
02/03/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
02/03/15	MPL	0.20	50.00	B P	Draft order granting fees and costs per NRS 41.670.
02/05/15	MPL	0.10	25.00	B P	Legal analysis of Shapiros' case appeal statement.
02/05/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .

Date	Emp	Hours	Dollars	Gp	
02/06/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re if
02/06/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
02/06/15	MPL	0.10	25.00	B P	Legal analysis of notice of appeal filed in Supreme Court.
02/09/15	MPL	0.10	25.00	B P	Legal analysis of Supreme Court order suspending briefing for settlement conference.
02/10/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt discussing
02/10/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re will inform
02/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re options for
02/11/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt providing options for
02/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
02/12/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re order on
02/12/15	MPL	0.10	25.00	B P	Telephone call with Glenn Welt re potential
02/12/15	MPL	0.10	25.00	B P	Legal analysis of order appointing William Turner as mediator.
02/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to
02/13/15	MPL	0.20	50.00	B P	Draft notice of appeal.
02/13/15	MPL	0.60	150.00	B P	Draft case appeal statement.
02/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re
02/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re meaning of
02/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re

Date	Emp	Hours	Dollars	Gp	
02/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re efforts to .
02/17/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re seeking .
02/17/15	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo re seeking reimbursement for fees from Walter Shapiro.
02/17/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re reimbursement for fees from Walter Shapiro.
02/19/15	MPL	0.10	25.00	B P	Legal analysis of court order granting partial attorneys' fees.
02/19/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re objections to .
02/19/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re objections to .
02/23/15	MPL	0.10	25.00	B P	Per local rules, draft notice of entry of order granting motion for attorneys' fees.
02/23/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising of .
02/23/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy of .
02/23/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re begin ?
02/23/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt approving .
02/23/15	MPL	0.20	50.00	B P	Draft correspondence to Christina Murphy re collecting judgment against cost bonds.
02/25/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re draft of .
02/25/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt recommending .
02/25/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re questions about .

Date	Emp	Hours	Dollars	Gp	
02/25/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re answering questions about n
02/25/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt
02/26/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt approving
02/26/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt explaining
02/26/15	MPL	0.10	25.00	B P	Draft correspondence to William Turner re Welts request in-person settlement conference.
02/26/15	MPL	0.10	25.00	B P	Legal analysis of Shapiro's case appeal statement.
02/26/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy for
02/27/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re mechanics of
02/27/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re requesting
03/02/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re terms of potential settlement conference.
03/03/15	MPL	0.10	25.00	B P	Legal analysis of Shapiro's docketing statement describing procedural nature of appeal.
03/05/15	MPL	0.10	25.00	B P	Analysis of correspondence from Bill Turner re intent to proceed with settlement conference.
03/09/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re responsibility for
03/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re misrepresentation
03/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Evan Schwab re potential Supreme Court settlement conference.
03/13/15	MPL	0.40	100.00	B P	Telephone call with settlement judge Bill Turner about viability of settlement at settlement conference.
03/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re conversations with Bill Turner about

Date	Emp	Hours	Dollars	Gp	
					viability of settlement.
03/14/15	MPL	0.10	25.00	B P	Draft notice of appeal re order on attorneys' fees.
03/14/15	MPL	0.10	25.00	B P	Draft case appeal statement re order on attorneys' fees.
03/18/15	MPL	0.10	25.00	B P	Analysis of correspondence from Rhoda Welt re difficulties
03/18/15	MPL	0.10	25.00	B P	Draft correspondence to Rhoda Welt re options for
03/18/15	MPL	0.20	50.00	B P	Draft motion to consolidate appeals for procedural and efficiency reasons.
03/19/15	MPL	0.10	25.00	B P	Analysis of correspondence from Rhoda Welt re
03/23/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy of
03/23/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing
03/24/15	MPL	1.00	250.00	B P	Draft docketing statement for appeal of award on attorneys' fees.
03/24/15	MPL	0.10	25.00	B P	Analysis of correspondence from Bill Turner re viability of settlement conference.
03/31/15	MPL	0.10	25.00	B P	Telephone call with Bill Turner re merits of settlement.
04/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re status of
04/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re status of
04/16/15	MPL	0.20	50.00	B P	Conference call with Alex Ghibaudo and Bill Turner re viability of settlement conference producing actual settlement.
04/16/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re preparing for
04/20/15	MPL	0.20	50.00	B P	Telephone call with Alex Ghibaudo re finding common ground to attempt resolution.
04/27/15	MPL	0.40	100.00	B P	Telephone call with Glenn Welt re potential coming mediation.
04/29/15	MPL	1.70	425.00	B P	Begin drafting settlement conference brief.
04/30/15	MPL	0.40	100.00	B P	Finalize settlement conference statement.

Date	Emp	Hours	Dollars	Gp	
04/30/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
05/02/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo re Shapiros suddenly unable to personally attend settlement conference.
05/02/15	MPL	0.10	25.00	B P	Draft correspondence to Bill Turner re personal presence essential to settlement conference.
05/02/15	MPL	0.10	25.00	B P	Analysis of correspondence from Bill Turner re will proceed with settlement conference as scheduled.
05/03/15	MPL	0.10	25.00	B P	Analysis of correspondence from Bill Turner asking about jurisdictional basis in Nevada for Rhoda, Lynn and Michelle.
05/03/15	MPL	0.10	25.00	B P	Draft correspondence to Bill Turner explaining Rhoda, Lynn and Michelle consented to Nevada's jurisdiction.
05/04/15	MPL	0.80	200.00	B P	Drive to/from Peel Brimley for Supreme Court settlement conference.
05/04/15	MPL	1.40	350.00	B P	Attend Supreme Court settlement conference with Glenn Welt. Settlement did not occur.
05/04/15	MPL	0.10	25.00	B P	Draft correspondence to Michelle Nelsen at RLI re payment on cost bonds.
05/04/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re penalties for .
05/05/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re likely .
05/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to .
05/07/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising .
05/11/15	MPL	0.10	25.00	B P	Telephone call with Glenn Welt re potential consequences .
05/11/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re proposed .
05/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt approving .
05/11/15	MPL	0.10	25.00	B P	Send email to Alex Ghibaudo about 2nd lawsuit and potential settlement.

Date	Emp	Hours	Dollars	Gp	
05/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo advising Shapiros unlikely to agree to settlement proposal.
05/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo confirming Shapiros reject settlement proposal.
05/11/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising .
05/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to .
05/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt instructing to .
05/11/15	MPL	1.80	450.00	B P	Begin drafting motion to dismiss for failure to attend settlement conference.
05/12/15	MPL	0.80	200.00	B P	Finalize motion to dismiss for failure to personally attend the settlement conference.
05/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo attacking merits of motion to dismiss.
05/12/15	MPL	0.20	50.00	B P	Draft correspondence to Alex Ghibaudo correcting attack on merits of motion to dismiss.
05/12/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt recommending .
05/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re anticipated c .
05/12/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
05/12/15	MPL	0.20	50.00	B P	Telephone call with Alex Ghibaudo re motion to dismiss.
05/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
05/12/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
05/12/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt indicating .
05/12/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re strategy of .
05/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re proposed

Date	Emp	Hours	Dollars	Gp	
05/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising
05/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt directing
05/13/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt requesting
05/13/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt again recommending
05/14/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re advising S
05/14/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising
05/20/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re status
05/20/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt explaining the status of
05/20/15	MPL	0.30	75.00	B P	Legal analysis of Shapiro's opposition to motion to dismiss appeal.
05/20/15	MPL	2.60	650.00	B P	Draft response to Shapiro's opposition to motion to dismiss appeal.
05/20/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt commenting on
05/20/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re proposed
05/21/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re language
05/21/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt indicating
05/26/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
05/26/15	MPL	0.20	50.00	B P	Finalize reply supporting motion to dismiss Shapiro's appeal.

Date	Emp	Hours	Dollars	Gp	
06/19/15	MPL	0.10	25.00	B P	Legal analysis of Supreme Court order denying motion to dismiss.
06/19/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re scheduling order and order denying motion to dismiss appeal.
08/06/15	MPL	0.10	25.00	B P	Legal analysis of notice documenting district court transcripts are now in Supreme Court record.
09/10/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re potential
09/10/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt discussing
09/15/15	MPL	0.10	25.00	B P	Legal analysis of Supreme Court order granting Shapiros an extension to file opening brief.
09/15/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re order granting Shapiros an extension to file opening brief.
10/02/15	MPL	0.10	25.00	B P	Legal analysis of Shapiro's motion to extend period to file brief.
10/02/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
10/21/15	MPL	0.10	25.00	B P	Legal analysis of Supreme Court order allowing Shapiros to file opening brief.
10/21/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re
11/10/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re obtaining
11/14/15	MPL	0.60	150.00	B P	Begin drafting jurisdictional statement and statement of issues for appellate brief.
11/16/15	MPL	1.20	300.00	B P	Draft statement of case and summary of argument for appellate brief.
11/17/15	MPL	3.20	800.00	B P	Draft statement of facts, standard of review section and section about shortcomings in Shapiros' appendix.
11/17/15	MPL	6.50	1,625.00	B P	Draft argument that district court's decision was substantively correct and appropriately relied upon Jacobs v. Adelson.
11/18/15	MPL	3.50	875.00	B P	Begin drafting argument that district court's ruling on discretionary award, fees and costs was incorrect or an abuse of discretion.

Date	Emp	Hours	Dollars	Gp	
11/23/15	MPL	0.60	150.00	B P	Draft motion to dismiss new constitutionality arguments from Shapiros' opening brief.
11/23/15	MPL	1.30	325.00	B P	Continue drafting argument that district court's ruling on recoverable attorneys' fees was incorrect.
11/23/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re anticipated appellate arguments.
11/23/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
11/23/15	MPL	0.10	25.00	B P	Finalize motion to dismiss new argument in Shapiros' opening brief.
11/23/15	MPL	1.90	475.00	B P	Finalize answering brief to include references in appendix and hone arguments to supporting documents.
11/23/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt advising .
12/04/15	MPL	0.10	25.00	B P	Legal analysis of Supreme Court order denying motion to dismiss new argument from opening brief.
12/04/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/04/15	MPL	1.60	400.00	B P	Begin drafting supplemental answering brief addressing constitutionality arguments raised for the first time in the Shapiros' opening brief.
12/04/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/06/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re efforts to .
12/06/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re proposed .
12/07/15	MPL	2.90	725.00	B P	Finalize supplemental answering brief addressing new constitutional arguments.
12/07/15	MPL	0.10	25.00	B P	Draft motion for leave to file supplemental answering brief addressing new constitutional arguments.
12/07/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
12/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
12/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Marc Randazza requesting consent to file

Date	Emp	Hours	Dollars	Gp	
12/07/15	MPL	0.10	25.00	B P	Draft correspondence to Marc Randazza noting consent is not required from parties for amicus brief.
12/07/15	MPL	0.10	25.00	B P	Analysis of correspondence from Marc Randazza discussing deadlines for amicus brief.
12/08/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re whether
12/08/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt stating
12/11/15	MPL	0.10	25.00	B P	Legal analysis of proposed consent form to allow Nevada Press Association to file an amicus brief.
12/11/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re proposed consent form to allow Nevada Press Association to file an amicus brief.
12/11/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt approving
12/14/15	MPL	0.10	25.00	B P	Legal analysis of Randazza's motion to file amicus brief.
12/18/15	MPL	0.10	25.00	B P	Legal analysis of Shapiro's non-opposition to supplemental brief if 45 day continue approved.
12/29/15	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt asking about
12/29/15	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt
01/06/16	MPL	0.10	25.00	B P	Legal analysis of proposed stipulation to extend Shapiros' deadline to file reply.
01/06/16	MPL	0.10	25.00	B P	Draft correspondence to Alex Ghibaudo conditioning approval of proposed stipulation to extend Shapiros' deadline to file reply upon also approving filing the Welts' supplemental brief.
01/06/16	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo agreeing to terms of stipulation re briefing.
01/07/16	MPL	0.10	25.00	B P	Draft correspondence to Evan Schwab and Alex Ghibaudo re conflicting representation of Shapiros.
01/07/16	MPL	0.10	25.00	B P	Analysis of correspondence from Alex Ghibaudo claiming he continues to represent the Shapiros.

Date	Emp	Hours	Dollars	Gp	
01/21/16	MPL	0.10	25.00	B P	Legal analysis of order from Supreme Court granting Welts' motion to file supplemental answering brief.
02/04/16	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re .
02/08/16	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy for .
02/08/16	MPL	0.20	50.00	B P	Read Mullen v Meredith Oregon case.
02/08/16	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt answering question a .
02/11/16	MPL	0.40	100.00	B P	Legal analysis of Shapiros' reply brief on constitutional issues and response to brief about attorneys' fees.
02/11/16	MPL	0.10	25.00	B P	Analysis of correspondence from Glenn Welt re strategy for .
02/14/16	MPL	3.90	975.00	B P	Draft reply brief on attorney's fees recovery.
02/16/16	MPL	0.10	25.00	B P	Draft correspondence to Glenn Welt re .
Total FEES		-----	-----		
		121.90	30,475.00		121.90 30,475.00 (CP 01/01/81 - 07/25/17)
		121.90	30,475.00		121.90 30,475.00 (CTD Through 07/25/17)
		=====	=====		
		Actual Hours/\$			Billable Hours/\$

----- Fee Analysis (CP 01/01/81 - 07/25/17)						
Code	Name	----- Hours	Actual Dollars	----- Actual \$/ Actual Hrs	----- Billable Dollars	----- Billable\$/ Actual Hrs
MPL	Michael P. Lowry	121.90	30,475.00	250.00	121.90 30,475.00	250.00
=====						
COSTS - Direct					COSTS - Direct	
Date	Units	Dollars	Gp			
10/03/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Rhonda Welt and Lynn Welt's NRCP 7.1 Disclosure Statement		
10/03/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Initial Appearance Fee Disclosure for Rhoda Welt and Lynn Welt		
10/03/14		264.09	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Rhoda Welt and Lynn		

Date	Units	Dollars	Gp	
				Welt's Demand for Security of Costs
10/15/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt & Michele Welt's Initial Appearance Fee Disclosure
10/15/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt & Michele Welt's NRCP 7.1 Disclosure Statement
10/15/14		264.09	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt & Michele Welt's Demand for Security of Costs
12/11/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Reply re Motion to Dismiss
12/16/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion to Dismiss
12/16/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Notice of Withdrawal of Motion
12/23/14		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Glenn Welt, Rhonda Welt, Lynn Welt and Michele Welt's Reply Re Motion to Dismiss
01/05/15		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Notice of Entry of Order Granting Motion to Dismiss
01/06/15		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Affidavit in Support of Fees and Costs per NRS 41.670
01/20/15		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Reply in Support of Affidavit re Fees and Costs per NRS 41.670
02/17/15		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Cross-Appeal Case Statement
02/17/15		28.22	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Notice of Cross-Appeal
02/24/15		3.50	B P	E112 - Mandatory Clark County Electronic Filing Fee re: Notice of Entry of Order Granting Motion for Attorneys' Fees
03/09/15	MPL	250.00	B P	//165026//E123 - Chase Credit Card Services- Reimburse Mike Lowry for Supreme Court filing fee
04/17/15	MPL	250.00	B P	//165922//E112 - Chase Credit Card Services- Reimburse Mike Lowry, Esq. for Supreme Court Filing Fee

Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion
for Attorneys' Fees & to Amend Order Granting Summary
Judgment

A-14-706566-C

Exhibit 2

Thorndal Armstrong Cost Records

Details of filing: Rhoda Welt and Lynn Welt's NRCP 7.1 Disclosure Statement
Filed in Case Number: A-14-706566-C

OCT 03 2014

E-File ID: 6218153**Lead File Size:** 67751 bytes**Date Filed:** 2014-10-01 15:51:00.0**Case Title:** A-14-706566-C**Case Name:** Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)**Filing Title:** Rhoda Welt and Lynn Welt's NRCP 7.1 Disclosure Statement**Filing Type:** EFS**Filer's Name:** Carry van Eekhout**Filer's Email:** cve@thorndal.com**Account Name:** Thorndal,Armstrong, Delk, Balkenbush & Eisinger**Filing Code:** DSST**Amount:** \$ 3.50**Court Fee:** \$ 0.00**Card Fee:** \$ 0.00**Payment:** 02-OCT-2014 10:12:43 AM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]**Comments:****Courtesy Copies:** mpl@thorndal.com**Firm Name:** Thorndal, Armstrong Delk, Balkenbush & Eisinger**Your File Number:** Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)**Date Accepted:** 2014-10-02 07:12:44.0**Review Comments:****Reviewer:** Terri Stringer**File Stamped
Copy:** A-14-706566-C-6218153_DSST Rhoda Welt and Lynn Welt s NRCP 7 1 Disclosure Statement.pdf**Cover Document:****Documents:****Lead Document:** 71.pdf 67751 bytes**Data Reference ID:****Credit Card** System Response: VSHCC35CD3C2**Response:** Reference:

Details of filing: *Initial Appearance Fee Disclosure for Rhoda Welt and Lynn Welt*
Filed in Case Number: A-14-706566-C

OCT 03 2014

E-File ID: 6218140**Lead File Size:** 67737 bytes**Date Filed:** 2014-10-01 15:50:13.0**Case Title:** A-14-706566-C**Case Name:** Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)**Filing Title:** Initial Appearance Fee Disclosure for Rhoda Welt and Lynn Welt**Filing Type:** EFS**Filer's Name:** Carry van Eekhout**Filer's Email:** cve@thorndal.com**Account Name:** Thorndal,Armstrong, Delk, Balkenbush & Eisinger**Filing Code:** IAFD**Amount:** \$ 3.50**Court Fee:** \$ 0.00**Card Fee:** \$ 0.00**Payment:** 01-OCT-2014 07:41:46 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]**Comments:****Courtesy Copies:****Firm Name:** Thorndal, Armstrong Delk, Balkenbush & Eisinger**Your File Number:** Welt.Shapiro/MPL

WELTG.SHAPIRO/MPL

Status: Accepted - (A)**Date Accepted:** 2014-10-01 16:41:47.0**Review****Comments:****Reviewer:** Walter Abregow**File Stamped**
Copy: A-14-706566-C-6218140 IAFD Initial Appearance Fee Disclosure for Rhoda Welt and Lynn Welt.pdf**Cover Document:****Documents:****Lead Document:** IAFD for Rhoda & Lynn.pdf 67737 bytes**Data Reference ID:****Credit Card** System Response: VUYCC4C2D8CE**Response:** Reference:

Details of filing: Rhoda Welt and Lynn Welt's Demand for Security of Costs
Filed in Case Number: A-14-706566-C

OCT 03 2014

E-File ID: 6218132

Lead File Size: 68244 bytes

Date Filed: 2014-10-01 15:49:31.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Rhoda Welt and Lynn Welt's Demand for Security of Costs

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: DMSC

Amount: \$ 3.50

Court Fee: \$ 253.00

Card Fee: \$ 7.59

Payment: 01-OCT-2014 07:41:26 PM: Approved \$264.09 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies: mpl@thorndal.com

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-10-01 16:41:29.0

Review

Comments:

Reviewer: Walter Abregow

File Stamped
Copy: A-14-706566-C-6218132_DMSC_Rhoda_Welt_and_Lynn_Welt_s_Demand_for_Security_of_Costs.pdf

Cover Document:

Documents:

Lead Document: Demand for Security of Costs for Rhoda & Lynn.pdf 68244 bytes

Data Reference

ID:

Credit Card System Response: VUJCC4C2D7EB

Response: Reference:

Details of filing: *Glenn Welt & Michele Welt's Initial Appearance Fee Disclosure*
Filed in Case Number: A-14-706566-C

OCT 15 2014

E-File ID: 6262537

Lead File Size: 67926 bytes

Date Filed: 2014-10-13 13:19:14.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt & Michele Welt's Initial Appearance Fee Disclosure

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: IAFD

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 13-OCT-2014 06:47:03 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG.SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-10-13 15:47:05.0

Review Comments:

Reviewer: Pamela Pullan

File Stamped
Copy: A-14-706566-C-6262537 IAFD Glenn Welt Michele Welt s Initial Appearance Fee Disclosure.pdf

Cover Document:

Documents:
Lead Document: IAFD for Glenn & Michele.pdf 67926 bytes

Data Reference ID:

Credit Card System Response: VPECB443008F

Response: Reference:

Details of filing: *Glenn Welt & Michele Welt's NRCP 7.1 Disclosure Statement*

Filed in Case Number: A-14-706566-C

OCT 15 2014

E-File ID: 6262540

Lead File Size: 67870 bytes

Date Filed: 2014-10-13 13:19:49.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt & Michele Welt's NRCP 7.1 Disclosure Statement

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: DSST

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 13-OCT-2014 06:47:27 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG.SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-10-13 15:47:31.0

Review Comments:

Reviewer: Pamela Pullan

File Stamped Copy: A-14-706566-C-6262540_DSST_Glenn_Welt_Michele_Welt's_NRCP_7.1_Disclosure_Statement.pdf

Cover Document:

Documents:

Lead Document: Z.pdf 67870 bytes

Data Reference ID:

Credit Card System Response: VLFCB622C5B2

Response: Reference:

Details of filing: *Glenn Welt & Michele Welt's Demand for Security of Costs*
Filed in Case Number: A-14-706566-C

OCT 15 2014

E-File ID: 6262527

Lead File Size: 68148 bytes

Date Filed: 2014-10-13 13:18:30.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt & Michele Welt's Demand for Security of Costs

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: DMSC

Amount: \$ 3.50

Court Fee: \$ 253.00

Card Fee: \$ 7.59

Payment: 13-OCT-2014 06:15:12 PM: Approved \$264.09 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[***-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-10-13 15:15:16.0

Review

Comments:

Reviewer: Pamela Pullan

File Stamped
Copy: A-14-706566-C-6262527-DMSC Glenn Welt Michele Welt s Demand for Security of Costs.pdf

Cover Document:

Documents:

Lead Document: Demand for Security of Costs for Glenn & Michele.pdf 68148 bytes

Data Reference

ID:

Credit Card System Response: VTHCC5FC668B

Response: Reference:

Details of filing: *Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Reply re Motion to Dismiss*
Filed in Case Number: A-14-706566-C

E-File ID: 6452424

Lead File Size: 115416 bytes

Date Filed: 2014-12-10 08:46:36.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Reply re Motion to Dismiss

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: ROPP

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 10-DEC-2014 11:49:04 AM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy
Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File
Number: Welt.Shapiro/MPL

Status: Accepted - (A)

Date Accepted: 2014-12-10 08:49:10.0

Review
Comments:

Reviewer: Patty Azucena

File Stamped A-14-706566-

Copy: C-6452424 ROPP Glenn Welt Rhoda Welt Lynn Welt Michele Welt s Reply re Motion to Dismiss.pdf

Cover Document:

Lead Document: Mtn to Dismiss re Cost Bond_Reply_.pdf 115416 bytes

Documents: Attachment # 1: Reply Exhibit 1.pdf 56911 bytes

Attachment # 2: Reply Exhibit 2.pdf 59651 bytes

Attachment # 3: Reply Exhibit 3.pdf 112624 bytes

Attachment # 4: Reply Exhibit 4.pdf 57904 bytes

Data Reference
ID:

Credit Card System Response: VPECB69D3B43

Response: Reference:

Details of filing: *Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion to Dismiss*
Filed in Case Number: A-14-706566-C

E-File ID: 6467378

Lead File
Size: 236911 bytes

DEC 16 2014

Date Filed: 2014-12-15 12:19:57.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion to Dismiss

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account
Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: MDSM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 15-DEC-2014 04:36:31 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger" [****-5671]

Comments: NRS 41.660(f) requires the court to "[r]ule on the motion within 7 judicial days after the motion is served upon the plaintiff." This impacts the hearing schedule as the 7 days expires on 12/24.

Courtesy
Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File
Number: Welt.Shapiro/MPL

WELT.G.SHAPIRO/MPL

Status: Accepted - (A)

Date
Accepted: 2014-12-15 13:36:35.0

Review
Comments:

Reviewer: Joshua Raak

File Stamped
Copy: A-14-706566-C-6467378_MDSM_Glenn_Welt_Rhoda_Welt_Lynn_Welt_Michele_Welt_s_Motion_to_Dismiss.pdf

Cover Document:

Documents: Lead Document: Welt Mtn.pdf 236911 bytes

Attachment # 1: Welt Mtn Exhibits.pdf 2405671 bytes

Data
Reference ID:

Credit Card System Response: VQCCB89881DD

Response: Reference:

Details of filing: *Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Notice of Withdrawal of Motion*
Filed in Case Number: A-14-706566-C

E-File ID: 6467293

Lead File Size: 71454 bytes

DEC 16 2014

Date Filed: 2014-12-15 12:07:23.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Notice of Withdrawal of Motion

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: NWM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 15-DEC-2014 04:24:09 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments: This notice withdraws the motion pending in this case that is set for hearing on 12/17. The hearing may be vacated.

Courtesy

Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-12-15 13:24:11.0

Review Comments: Your Notice has been filed but a hearing cannot be vacated without department approval. Thank you

Reviewer: Joshua Raak

File Stamped A-14-706566-

Copy: C-6467293 NWM Glenn Welt Rhoda Welt Lynn Welt Michele Welt s Notice of Withdrawal of Motion.pdf

Cover Document:

Documents:

Lead Document: Welt Withdrawal.pdf 71454 bytes

Data Reference

ID:

Credit Card System Response: VLFCBA20CF3A

Response: Reference:

Details of filing: *Glenn Welt, Rhoda Welt, Lynn Welt and Michele Welt's Reply Re Motion to Dismiss*
Filed in Case Number: A-14-706566-C

E-File ID: 6487606

Lead File Size: 134860 bytes

Date Filed: 2014-12-19 15:36:07.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Glenn Welt, Rhoda Welt, Lynn Welt and Michele Welt's Reply Re Motion to Dismiss

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: ROPP

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 22-DEC-2014 11:40:17 AM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy

Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

**Your File
Number:** Welt.Shapiro/MPL

WELTG.SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2014-12-22 08:40:19.0

Review

Comments:

Reviewer: Pamela Pullan

File Stamped A-14-706566-

Copy: C-6487606 ROPP Glenn Welt Rhoda Welt Lynn Welt and Michele Welt s Reply Re Motion to Dismiss.pdf

Cover Document:

Documents: Lead Document: Anti-SLAPP Mtn Reply .pdf 134860 bytes

Attachment # 1: Answer to Petition for Conservatorship & Counterclaim.pdf 5572697 bytes

Data Reference

ID:

Credit Card System Response: VTJCCA7C8500

Response: Reference:

DEC 23 2014

Details of filing: Notice of Entry of Order Granting Motion to Dismiss
Filed in Case Number: A-14-706566-C

JAN 05 2015

E-File ID: 6516486

Lead File Size: 66765 bytes

Date Filed: 2015-01-02 12:49:53.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Notice of Entry of Order Granting Motion to Dismiss

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: NEOJ

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 02-JAN-2015 03:52:36 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2015-01-02 12:52:39.0

Review Comments:

Reviewer: Leona Asifoa

File Stamped Copy: A-14-706566-C-6516486 NEOJ Notice of Entry of Order Granting Motion to Dismiss.pdf

Cover Document:

Documents: Lead Document: NOE_Order_Granteeing Anti-SLAPP motion.pdf 66765 bytes

Attachment # 1: Order Granting Anti-SLAPP Mtn.pdf 97301 bytes

Data Reference ID:

Credit Card System Response: VUYCCA9FEB57

Response: Reference:

Details of filing: Affidavit in Support of Fees and Costs per NRS 41.670
Filed in Case Number: A-14-706566-C

E-File ID: 6520297

Lead File Size: 80709 bytes

Date Filed: 2015-01-05 12:59:23.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Affidavit in Support of Fees and Costs per NRS 41.670

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: AFFD

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 05-JAN-2015 04:02:03 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELT.G. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2015-01-05 13:02:05.0

Review Comments:

Reviewer: Walter Abregow

File Stamped Copy: A-14-706566-C-6520297 AFFD Affidavit in Support of Fees and Costs per NRS 41.670.pdf

Cover Document:

Documents: Lead Document: DOC.pdf 80709 bytes

Attachment # 1: Welt Billing.pdf 140088 bytes

Data Reference ID:

Credit Card System Response: VQECB9C3638A

Response: Reference:

JAN 06 2015

Details of filing: *Reply in Support of Affidavit re Fees and Costs per NRS 41.670*

Filed in Case Number: A-14-706566-C

E-File ID: 6560351

Lead File Size: 89253 bytes

Date Filed: 2015-01-16 08:24:34.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Reply in Support of Affidavit re Fees and Costs per NRS 41.670

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: RIS

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 16-JAN-2015 11:53:40 AM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

Welt.G. Shapiro/MPL

Status: Accepted - (A)

Date Accepted: 2015-01-16 08:53:42.0

Review Comments:

Reviewer: Kory Schlitz

File Stamped
Copy: A-14-706566-C-6560351 RIS Reply in Support of Affidavit re Fees and Costs per NRS 41.670.pdf

Cover Document:

Documents:

Lead Document: Welt Reply.pdf 89253 bytes

Data Reference ID:

Credit Card System Response: VUYCCB6664A6

Response: Reference:

Details of filing: *Cross-Appeal Case Statement*
Filed in Case Number: A-14-706566-C

E-File ID: 6656141

Lead File Size: 92958 bytes

Date Filed: 2015-02-13 10:37:37.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Cross-Appeal Case Statement

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: ASTA

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 13-FEB-2015 01:55:41 PM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger"
[****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELTG. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2015-02-13 10:55:43.0

Review Comments:

Reviewer: Chauntel Hahn

File Stamped Copy: A-14-706566-C-6656141 ASTA Cross Appeal Case Statement.pdf

Documents: Cover Document:

Lead Document: Cross-Appeal Case Statement.pdf 92958 bytes

Data Reference ID:

Credit Card System Response: VXHCCD605917

Response: Reference:

Details of filing: *Notice of Cross-Appeal*

Filed in Case Number: A-14-706566-C

E-File ID: 6656127

Lead File Size: 67752 bytes

Date Filed: 2015-02-13 10:36:19.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Notice of Cross-Appeal

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: NOAS

Amount: \$ 3.50

Court Fee: \$ 24.00

Card Fee: \$ 0.72

Payment: 13-FEB-2015 01:55:17 PM: Approved \$28.22 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger" [****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

WELT.G. SHAPIRO/MPL

Status: Accepted - (A)

Date Accepted: 2015-02-13 10:55:18.0

Review Comments:

Reviewer: Chauntel Hahn

File Stamped Copy: A-14-706566-C-6656127 NOAS Notice of Cross Appeal.pdf

Cover Document:

Documents:

Lead Document: Notice of Cross-Appeal.pdf 67752 bytes

Data Reference ID:

Credit Card System Response: VUYCCCFE039

Response: Reference:

Details of filing: *Notice of Entry of Order Granting Motion for Attorneys' Fees*
Filed in Case Number: A-14-706566-C

E-File ID: 6680790

Lead File Size: 66957 bytes

Date Filed: 2015-02-23 06:28:18.0

Case Title: A-14-706566-C

Case Name: Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)

Filing Title: Notice of Entry of Order Granting Motion for Attorneys' Fees

Filing Type: EFS

Filer's Name: Carry van Eekhout

Filer's Email: cve@thorndal.com

Account Name: Thorndal,Armstrong, Delk, Balkenbush & Eisinger

Filing Code: NEOJ

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 23-FEB-2015 11:26:57 AM: Approved \$3.50 on Visa account "Thorndal,Armstrong, Delk, Balkenbush & Eisinger" [****-5671]

Comments:

Courtesy Copies:

Firm Name: Thorndal, Armstrong Delk, Balkenbush & Eisinger

Your File Number: Welt.Shapiro/MPL

Status: Accepted - (A)

Date Accepted: 2015-02-23 08:26:59.0

Review Comments:

Reviewer: Kadir Beckom

File Stamped Copy: A-14-706566-C-6680790 NEOJ Notice of Entry of Order Granting Motion for Attorneys Fees.pdf

Cover Document:

Documents: Lead Document: NOE Order re Fees.pdf 66957 bytes

Attachment # 1: Affidavit in Support of Fees and Costs (Order).pdf 102034 bytes

Data Reference ID:

Credit Card Response: System Response: VRFCBCB310FA
Reference:

FEB 24 2015

ENTITY VENDOR
TADBE Chase Credit Card Services [CHS2L]

CHECK DATE CHECK NO.
03/09/2015 115671

DOC NO	APPLY TO	DATE	VENDOR CREDIT NO	VENDOR INVOICE NO	DOC AMOUNT	DISCOUNT	PAYMENT AMOUNT
115671	165024	03/09/2015			64.49	0.00	64.49
YAMPOL-VAHEY/BKT 1260-0-000							
115671	165025	03/09/2015			400.00	0.00	400.00
DOLGEN-TORRES/CJC 1260-0-000							
115671	165026	03/09/2015			250.00	0.00	250.00
WELTG-SHAPIRO/MPL 1260-0-000							
115671	165027	03/09/2015			332.55	0.00	332.55
LUNCH MEETING WITH DOUG LAWSON FROM KEOLIS- MPL 8720-1-629							
115671	165028	03/09/2015			11.58	0.00	11.58
COFFEE MEETING WITH CLAIMS MANAGER FROM NATIONAL INTERSTATE- MPL 8720-1-629							
115671	165029	03/09/2015			28.50	0.00	28.50
MARCH 2015 RIMS LUNCH- MPL 8720-1-629							
115671	165030	03/09/2015			1,559.00	0.00	1,559.00
REGISTRATION FOR USLAW 2015 SPRING CONFERENCE- MPL 8730-1-000							
							2,646.12

THORNDAL ARMSTRONG
DELK, BALKENBUSH & EISINGER
A Professional Corporation
P.O. Box 2070 (702) 366-0622
Las Vegas, NV 89125-2070

THORNDAL ARMSTRONG
DELK, BALKENBUSH & EISINGER
A Professional Corporation
P.O. Box 2070 (702) 366-0622
Las Vegas, NV 89125-2070
88-0111721

Wells Fargo Bank
P.O. Box 19250
Las Vegas, NV 89132-0250
(800) 869-3557

94-7074/3212 CHECK NO
115671

CST 03/09/2015

DATE	AMOUNT
03/09/2015	*****2,646.12

Pay TWO THOUSAND SIX HUNDRED FORTY SIX AND 12/100 DOLLARS

Void after 180 days

To The
Order
Of Chase Credit Card Services

NOT NEGOTIABLE

/115671/ &321270742&5127342367/

TADBE
CHECK REQUEST

Amount \$ 290.00Date Submitted 3/19/15

Date Needed _____

PAYEE: [] COUNTY CLERK, or

Chase Card ServicesPRODUCT/SERVICE: Supreme Court of Nevada Filing Fee

FULL CASECODE INCLUDING ATTORNEY INITIALS/OFFICE PURPOSE: _____

Wetrg. Shapiro / MPL☒

The firm must advance all costs in this matter.

☐ The firm must advance costs up to \$ _____ pursuant to guidelines
of _____
(Insurance company or self-insured)

ATTORNEY: MPLRETURN CHECK TO: MPL

APPROVAL: _____

E-CODE: _____

NOTE: Check requests should include copies of appropriate backup documents that will
NOT be returned with the check.

NOTE: All case costs in excess of \$300 are to be submitted to the client for payment.

ALL CHECK REQUESTS REQUIRING APPROVAL BY THE COMMITTEE WILL BE
CONSIDERED AT THE NEXT SCHEDULED MEETING. PLEASE PLAN ACCORDINGLY.

Receipt

Supreme Court of Nevada

Payment Receipt

[PRINT](#)

Merchant Location Code: 0001

Payment Status: Success

Payment Date: 02/27/2015

Confirmation Number: 15022762434220

Billing Address: Michael Lowry

E-Mail Address: mlowry@thorndal.com

Total Amount: 250.00 USD

Card Type: VISA

Account #: x6445

Authorization Code: 00383D

Efiling Rules

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ENTITY TADBF . VENDOR Chase Credit Card Services [CHS2L]

CHECK DATE 04/17/2015 CHECK NO. 116103

DOC NO	APPLY TO	DATE	VENDOR CREDIT NO	VENDOR INVOICE NO	DOC AMOUNT	DISCOUNT	PAYMENT AMOUNT
116103	165922	04/17/2015			250.00	0.00	250.00
	WELTG SHAFIRO/MPL	1260-0-000					
116103	165923	04/17/2015			250.00	0.00	250.00
	YAMPOL-VAHEY2/BKT	1260-0-000					
116103	165924	04/17/2015			234.22	0.00	234.22
	AUTUM-VALLEY/PNG	1260-0-000					
116103	165925	04/17/2015			1,309.66	0.00	1,309.66
	HOTEL & MILEAGE FOR CLM ANNUAL CONF. IN PALM DESERT, CA- MPL	0710-1-629					
116103	165926	04/17/2015			24.50	0.00	24.50
	APRIL 2015 RIMS LUNCH- MPL	0720-1-629					
116103	165927	04/17/2015			1,612.80	0.00	1,612.80
	AIRFARE, HOTEL, ETC. FOR USLAN CONF. IN SAN ANTONIO, TX- MPL	0730-1-000					
116103	165934	04/17/2015			45.00	0.00	45.00
	MEET YOUR JUDGES MIXER- MPL	0710-1-629					
							3,734.18

THORNDAL ARMSTRONG
DELK, BALKENBUSH & EISINGER
A Professional Corporation
P.O. Box 2070 (702) 366-0622
Las Vegas, NV 89125-2070

THORNDAL ARMSTRONG
DELK, BALKENBUSH & EISINGER
A Professional Corporation
P.O. Box 2070 (702) 366-0622
Las Vegas, NV 89125-2070
88-0111721

Wells Fargo Bank
P.O. Box 19250
Las Vegas, NV 89132-0250
(800) 869-3557

94-7074/3212 CHECK NO
116103

DATE	AMOUNT
04/17/2015	*****3,734.18

Pay THREE THOUSAND SEVEN HUNDRED THIRTY FOUR AND 18/100 DOLLARS

Void after 180 days

To The Chase Credit Card Services
Order
Of

NOT NEGOTIABLE

/116103/ &321270742&5127342367/

CHS2L

**TADBE
CHECK REQUEST**

Amount \$ 250.00

Date Submitted 4/16/15
Date Needed _____

PAYEE: [] COUNTY CLERK, or

Chase Card Services

PRODUCT/SERVICE: _____

FULL CASECODE INCLUDING ATTORNEY INITIALS/OFFICE PURPOSE: _____

Weltg. Shop. 110 / MPL Supreme Court Filing Fee

_____ The firm must advance all costs in this matter.

_____ The firm must advance costs up to \$ _____ pursuant to guidelines
of _____
(Insurance company or self-insured)

ATTORNEY: _____

RETURN CHECK TO: MPL

APPROVAL: CL

E-CODE: E 112

NOTE: Check requests should include copies of appropriate backup documents that will NOT be returned with the check.

NOTE: All case costs in excess of \$300 are to be submitted to the client for payment.

ALL CHECK REQUESTS REQUIRING APPROVAL BY THE COMMITTEE WILL BE CONSIDERED AT THE NEXT SCHEDULED MEETING. PLEASE PLAN ACCORDINGLY.

Receipt

Supreme Court of Nevada

Payment Receipt**PRINT****Merchant Location Code:** 0001**Payment Status:** Success**Payment Date:** 03/18/2015**Confirmation Number:** 15031865097691**Billing Address:** Michael Lowry**E-Mail Address:** mlowry@thorndal.com**Total Amount:** 250.00 USD**Card Type:** VISA**Account #:** x6445**Authorization Code:** 00154D**Efiling Rules**

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Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion
for Attorneys' Fees & to Amend Order Granting Summary
Judgment

A-14-706566-C

Exhibit 3

Wilson Elser Billing Records

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
10/04/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Analysis of correspondence from Glenn Welt re Redaction																
10/06/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Draft correspondence to Glenn Welt explaining Redaction																
10/06/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Analysis of correspondence from Glenn Welt re Redaction																
11/03/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	6.00	1,500.00	250.00	6.00	1,500.00	250.00	10099	A101	2707313	Billed
Begin preparing oral argument about constitutionality of anti-SLAPP mechanisms and how court need not decide on constitutional grounds.																
11/04/2016	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2707313	Billed
Analysis of amici's proposed motion to participate in oral argument.																
11/04/2016	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Draft correspondence to Glenn Welt asking how Redaction																
11/07/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A108	2707313	Billed
Analysis of correspondence from Marc Randazza re potential media coverage at oral argument.																
11/07/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Analysis of correspondence from Glenn Welt re Redaction																
11/09/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Analysis of correspondence from Glenn Welt re Redaction																
11/09/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Analysis of correspondence from Marc Randazza re media coverage of oral argument.																
11/17/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.80	200.00	250.00	0.80	200.00	250.00	10099	A101	2707313	Billed
Continue oral argument preparations; cease preparation when informed Shapiros' attorney is being taken into surgery and cannot appear.																
11/17/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2707313	Billed
Draft correspondence to Glenn Welt re Redaction																
12/05/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	4.60	1,150.00	250.00	4.60	1,150.00	250.00	10099	A101	2715461	Billed
Resume preparations for oral argument; specifically prepare to address the constitutional arguments the Shapiros assert.																
12/06/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	3.40	850.00	250.00	3.40	850.00	250.00	10099	A101	2715461	Billed
Continue preparations for oral argument; finalize preparations for constitutional arguments and begin preparations for statutory arguments.																
12/07/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	4.40	1,100.00	250.00	4.40	1,100.00	250.00	10099	A101	2715461	Billed
Finalize all preparations for oral argument; specifically prepare to address arguments about the recovery of attorneys' fees.																
12/07/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.80	200.00	250.00	0.80	200.00	250.00	10099	A109	2715461	Billed
Attend oral argument before Supreme Court of Nevada.																
12/07/2016	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2715461	Billed
Draft correspondence to Glenn Welt re Redaction																
02/02/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	100.00	250.00	0.40	100.00	250.00	10099	A104	2744103	Billed
Analysis of Supreme Court's decision and reasoning for its result.																
02/02/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	150.00	250.00	0.60	150.00	250.00	10099	A104	2744103	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Conduct legal analysis of California law referenced in the decision as relates to the judicial proceeding statute.																
02/02/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	100.00	250.00	0.40	100.00	250.00	10099	A106	2744103	Billed
Draft correspondence to Glenn Welt re Supreme Court's decision, Redaction																
02/03/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2744103	Billed
Analysis of correspondence from Glenn Welt approving Redaction																
02/05/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	1.40	350.00	250.00	1.40	350.00	250.00	10099	A103	2744103	Billed
Begin drafting petition for rehearing based upon failure to address NRS 41.637(3) arguments.																
02/06/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	100.00	250.00	0.40	100.00	250.00	10099	A103	2744103	Billed
Finalize petition for rehearing.																
Redaction																
04/01/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2764615	Billed
Analysis of Supreme Court order denying petition for re-hearing.																
Redaction																
04/05/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2764615	Billed
Draft correspondence to Glenn Welt re options for Redaction																
Redaction																
04/06/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2764615	Billed
Analysis of correspondence from Glenn Welt advising can proceed Redaction																
Redaction																
04/24/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	2.40	540.00	225.00	2.40	540.00	225.00	10099	A103	2764615	Billed
Begin drafting revised motion to dismiss regarding anti-SLAPP statute; draft factual and procedural summaries, summary of Supreme Court findings on original grant of motion to dismiss.																
04/24/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	0.60	135.00	225.00	0.60	135.00	225.00	10099	A102	2764615	Billed
Research case law cited by Nevada Supreme Court in opinion regarding public interest test and absolute legal privilege.																
Redaction																

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Redaction																
04/25/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	2.10	472.50	225.00	2.10	472.50	225.00	10099	A103	2764615	Billed
Continue drafting motion to dismiss (Anti-SLAPP); draft analysis of 5 part public interest test; analysis of absolute privilege pursuant to Jacobs.																
Redaction																
04/26/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	1.80	405.00	225.00	1.80	405.00	225.00	10099	A103	2764615	Billed
Continue drafting motion to dismiss (Anti-SLAPP); draft additional arguments regarding Piping Rock decision, argument regarding timeliness of motion pursuant to Supreme Court remitter.																
Redaction																
04/28/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	0.60	135.00	225.00	0.60	135.00	225.00	10099	A103	2764615	Billed
Continue drafting motion to dismiss; draft additional argument regarding good faith standard.																
Redaction																
Continue drafting motion to dismiss; supplement arguments regarding absolute litigation standard under Jacobs, public interest test under Piping Rock.																
05/01/2017	L240	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	3.80	855.00	225.00	3.80	855.00	225.00	10099	A103	2774271	Billed
Continue drafting motion to dismiss; supplement arguments regarding absolute litigation standard under Jacobs, public interest test under Piping Rock.																
Redaction																
05/16/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2774271	Billed
Telephone call from Lynn Welt re Redaction																
05/17/2017	L120	7461	EBERT A	00005	5th YEAR ASSOCIATE	B	0.30	67.50	225.00	0.30	67.50	225.00	10099	A106	2774271	Billed
Telephone call with client regarding Redaction																
05/23/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	2.30	575.00	250.00	2.30	575.00	250.00	10099	A103	2774271	Billed
Begin revising renewed anti-SLAPP motion. Expand analysis to include cases from Louisiana, Georgia, and Vermont that address the "public interest" topic like California.																
05/24/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	2.70	675.00	250.00	2.70	675.00	250.00	10099	A103	2774271	Billed
Continue drafting renewed dispositive motion; work on distinguishing California law applicable to matters of public interest as opposed to those concerning a judicial proceeding.																
05/25/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	8.10	2,025.00	250.00	8.10	2,025.00	250.00	10099	A103	2774271	Billed
Continue drafting renewed dispositive motion; draft long section discussing how California's anti-SLAPP statute protects speech concerning matters under review before a judicial body and how the Welts' website was protected speech within that definition.																
05/26/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	8.50	2,125.00	250.00	8.50	2,125.00	250.00	10099	A103	2774271	Billed
Continue drafting renewed dispositive motion; draft section addressing Nevada statute protecting speech in direct connection with an issue of public interest in a place open to the public or in a public forum, 3 different manners in which California has applied that same protection, and why the Welts' website is protected under all 3.																

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
05/30/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A103	2774271	Billed
Draft correspondence to Glenn Welt re status of Redaction																
06/20/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A107	2784892	Billed
Telephone call from Alex Ghibaudo re late opposition to motion to dismiss.																
06/20/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2784892	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
06/20/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2784892	Billed
Analysis of correspondence from Rhoda Welt re Redaction																
06/21/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	150.00	250.00	0.60	150.00	250.00	10099	A104	2784892	Billed
Analysis of Shapiros' opposition to anti-SLAPP motion to dismiss.																
06/21/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	3.50	875.00	250.00	3.50	875.00	250.00	10099	A103	2784892	Billed
Draft reply debunking Shapiros' arguments in opposition.																
06/21/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2784892	Billed
Analysis of court order moving hearing to July 19 due to Shapiros' delinquent opposition.																
06/22/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2784892	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
07/06/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	100.00	250.00	0.40	100.00	250.00	10099	A104	2796055	Billed
Analysis of Supreme Court of Nevada's new Delucchi decision interpreting NRS 41.637 as argued in Welts' motion to dismiss.																
07/09/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	1.20	300.00	250.00	1.20	300.00	250.00	10099	A103	2796055	Billed
Draft supplemental briefing re why new Delucchi decision supports Welts' motion to dismiss.																
07/10/2017	L250	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2796055	Billed
Draft correspondence to Glenn Welt re supplemental brief re new Supreme Court decision.																
07/10/2017	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2796055	Billed
Analysis of correspondence from Glenn Welt instructing to Redaction																
07/10/2017	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A107	2796055	Billed
Draft correspondence to Alex Ghibaudo outlining terms of settlement offer.																
07/19/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	1.10	275.00	250.00	1.10	275.00	250.00	10099	A101	2796055	Billed
Prepare oral argument for court concerning merits of Welts' renewed motion to dismiss.																
07/19/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	2.20	550.00	250.00	2.20	550.00	250.00	10099	A109	2796055	Billed
Attend court hearing on motion to dismiss for anti-SLAPP.																
07/19/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	50.00	250.00	0.20	50.00	250.00	10099	A106	2796055	Billed
Draft correspondence to Glenn Welt re court's ruling on motion to dismiss and next steps in the process.																
07/19/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	3.70	925.00	250.00	3.70	925.00	250.00	10099	A103	2796055	Billed
Convert all briefing in support of the Welts into a 24 page court order granting their motion and other relief.																
07/24/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2796055	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
07/24/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A107	2796055	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Analysis of correspondence from Alex Ghibaudo refusing to approve order granting anti-SLAPP motion.																
08/09/2017	L240	7461	EBERT A	00006	6th YEAR ASSOCIATE	B	0.30	67.50	225.00	0.30	67.50	225.00	10099	A106	2809364	Billed
Draft correspondence to client regarding court's decision on motion to dismiss; Redaction																
08/14/2017	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2809364	Billed
Draft correspondence to Glenn Welt re terms of court's order granting summary judgment.																
08/14/2017	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.90	225.00	250.00	0.90	225.00	250.00	10099	A103	2809364	Billed
Begin drafting motion for attorneys' fees.																
08/15/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	75.00	250.00	0.30	75.00	250.00	10099	A106	2809364	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
08/15/2017	L460	7465	LOWRY M P	00030	PARTNERS - I	B	2.40	600.00	250.00	2.40	600.00	250.00	10099	A103	2809364	Billed
Continue drafting motion for attorneys' fees and costs, including redacting 33 pages of legal bills from Thorndal Armstrong and 8 pages from Wilson Elser to protect attorney client and attorney work product privileges																
08/15/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2809364	Billed
Draft correspondence to Glenn Welt answer his questions about Redaction																
08/15/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2809364	Billed
Analysis of correspondence from Glenn Welt instructing to Redaction																
08/16/2017	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2809364	Billed
Analysis of correspondence from Glenn Welt instructing to Redaction																
08/17/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2809364	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
08/28/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	75.00	250.00	0.30	75.00	250.00	10099	A103	2809364	Billed
Draft judgment debtor interrogatories to Howard and Jenna Shapiro.																
08/28/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	50.00	250.00	0.20	50.00	250.00	10099	A103	2809364	Billed
Draft judgment debtor requests for production to Howard and Jenna Shapiro.																
09/06/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2818660	Billed
Analysis of notice of appeal.																
09/07/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Analysis of correspondence from Glenn Welt re impact of Redaction																
09/11/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2818660	Billed
Analysis of court's order for Shapiros to submit case appeal statement.																
09/13/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2818660	Billed
Analysis of Shapiros' case appeal statement.																
09/14/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
09/20/2017	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.90	225.00	250.00	0.90	225.00	250.00	10099	A103	2818660	Billed
Draft amended order granting summary judgment and order granting motion for \$50,000+ in fees/costs.																
09/20/2017	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	150.00	250.00	0.60	150.00	250.00	10099	A109	2818660	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Attend hearing re motion for attorneys' fees and costs; motion granted.																
09/20/2017	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Draft correspondence to Glenn Welt re motion for attorneys' fees granted.																
09/20/2017	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Analysis of correspondence from Glenn Welt re potential Redaction																
09/21/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.00	0.00	0.00	10099	A104	2818660	Billed
Analysis of Shapiros' case appeal statement.																
09/22/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2818660	Billed
Analysis of court order exempting case from appellate settlement program.																
09/22/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Draft correspondence to Glenn Welt re case appeal statement available; no settlement conference ordered.																
09/25/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
09/25/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2818660	Billed
Analysis of correspondence from Glenn Welt instructing Redaction																
10/03/2017	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2843001	Billed
Analysis of Shaprios' docketing statement listing numerous issues for appeal.																
10/04/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A107	2843001	Billed
Draft correspondence to Alex Ghibaudo re Shapiros' pending responses to judgment debtor discovery.																
11/09/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	50.00	250.00	0.20	50.00	250.00	10099	A104	2843001	Billed
Analysis of Shapiros' motion to stay enforcement of judgment.																
11/10/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2843001	Billed
Draft correspondence to Glenn Welt re merits of Redaction																
11/10/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	3.70	925.00	250.00	3.70	925.00	250.00	10099	A103	2843001	Billed
Draft opposition to Shapiros' motion to stay enforcement of judgment.																
11/13/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2843001	Billed
Analysis of correspondence from Glenn Welt re options for Redaction																
11/28/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2843001	Billed
Analysis of correspondence from Glenn Welt re potential Redaction																
12/05/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A104	2854541	Billed
Analysis of Shapiros' Ex Parte Application for Order Shortening Time on Plaintiffs' Motion to Stay Proceedings																
12/11/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	50.00	250.00	0.20	50.00	250.00	10099	A107	2854541	Billed
Telephone call from Alex Ghibaudo re his potential Rule 60 motion to have judgment set aside.																
12/12/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	75.00	250.00	0.30	75.00	250.00	10099	A101	2854541	Billed
Prepare oral argument for court about why Shapiros' motion to stay collection efforts should be denied.																
12/13/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	1.00	250.00	250.00	1.00	250.00	250.00	10099	A109	2854541	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Attend court hearing on Shapiros' motion to stay collection; motion granted in part.																
12/13/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	100.00	250.00	0.40	100.00	250.00	10099	A103	2854541	Billed
Draft order granting, in part, motion to stay collection.																
12/13/2017	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	25.00	250.00	0.10	25.00	250.00	10099	A106	2854541	Billed
Draft correspondence to Glenn Welt re order granting, in part, motion to stay collection.																
Redaction																
01/19/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2874397	Billed
Analysis of Shapiros' renewed motion to stay collection.																
01/19/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2874397	Billed
Analysis of Shapiros' motion to have the court hear their renewed motion to stay collection earlier than scheduled.																
01/19/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Draft correspondence to Glenn Welt discussing the Shapiros' renewed motion to stay collection.																
01/19/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Analysis of correspondence from Glenn Welt re status of collection in NJ.																
Redaction																

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
01/20/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2874397	Billed
Analysis of order to hear Shapiros' renewed motion on 1/31 instead of February 22.																
01/20/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	1.00	265.00	265.00	1.00	265.00	265.00	10099	A104	2874397	Billed
Draft opposition to Shapiros' renewed motion to stay collection efforts while case is on appeal.																
01/20/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Draft correspondence to Glenn Welt re status of Redaction																
Redaction																
01/23/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Draft correspondence to Glenn Welt re Redaction																
Redaction																
01/24/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Analysis of correspondence from Glenn Welt advising Redaction																
Redaction																
01/25/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A101	2874397	Billed
Prepare oral argument for court about how Shapiros' concerns are moot because can't collect against business accounts anyway.																
01/25/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.90	238.50	265.00	0.90	238.50	265.00	10099	A109	2874397	Billed
Attend hearing on renewed motion to stay collections; motion denied.																
01/25/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2874397	Billed
Draft correspondence to Glenn Welt re court's ruling on 2nd motion to stay collection.																
01/25/2018	L470	7465	LOWRY M P	00030	PARTNERS - I	B	0.50	132.50	265.00	0.50	132.50	265.00	10099	A103	2874397	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Draft court's proposed order denying Shapiros' renewed motion to stay collection efforts.																
Redaction																
02/06/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2894070	Billed
Analysis of Shapiros' motion for additional time to file opening brief.																
Redaction																
02/06/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Draft correspondence to Glenn Welt re Redaction																
Redaction																
02/22/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Analysis of correspondence from Glenn Welt re Redaction																
03/02/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Analysis of correspondence from Glenn Welt re Redaction																
03/05/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Analysis of correspondence from Glenn Welt re Redaction																
03/13/2018	L530	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A104	2894070	Billed
Analysis of Shapiros' opening brief.																
03/19/2018	L530	7465	LOWRY M P	00030	PARTNERS - I	B	5.80	1,537.00	265.00	5.80	1,537.00	265.00	10099	A104	2894070	Billed
Draft response brief noting flaws in Shapiro's appellate arguments and stressing why district court should be affirmed.																
03/22/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	79.50	265.00	0.30	79.50	265.00	10099	A106	2894070	Billed
Draft correspondence to Glenn Welt analyzing the arguments in Shapiros' brief, Redaction																
03/23/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Analysis of correspondence from Glenn approving strategy for Redaction																
03/26/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2894070	Billed
Analysis of correspondence from Glenn Welt re potential affects of Redaction																
05/15/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A104	2963000	Billed
Analysis of Shapiros' reply brief supporting their appeal.																

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
09/13/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	2963000	Billed
Analysis of correspondence from Glenn Welt re Shapiros' emergency motion to stay.																
09/13/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	79.50	265.00	0.30	79.50	265.00	10099	A104	2963000	Billed
Analysis of Shapiros' emergency motion to stay.																
09/13/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	1.40	371.00	265.00	1.40	371.00	265.00	10099	A103	2963000	Billed
Draft Welts' opposition to Shapiros' emergency motion to stay.																
09/14/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A103	2963000	Billed
Draft correspondence to Glenn Welt answering his question about Redaction																
09/14/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2963000	Billed
Analysis of Supreme Court order denying Shapiros' 3rd request for stay.																
11/15/2018	L520	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	2989431	Billed
Analysis of court order that case will be decided without oral argument.																
11/16/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	1.40	371.00	265.00	1.40	371.00	265.00	10099	A106	2989431	Billed
Draft update to Glenn Welt discussing Redaction																
12/28/2018	L510	7465	LOWRY M P	00030	PARTNERS - I	B	1.30	344.50	265.00	1.30	344.50	265.00	10099	A104	3001633	Billed
Draft correspondence to Glenn Welt discussing Supreme Court's ruling and Redaction																
12/28/2018	L120	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A106	3001633	Billed
Draft correspondence to Glenn answering his questions about Redaction																
01/09/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A106	3024779	Billed
Analysis of Glenn's potential Redaction																
01/11/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A107	3024779	Billed
Telephone call from Alex Ghibauda asking whether 3rd anti-SLAPP motion will be filed; amending complaint to drop Jenna Shapiro.																
01/14/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3024779	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
01/14/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3024779	Billed
Analysis of correspondence from Glenn instructing to Redaction																
02/11/2019	L250	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A104	3024779	Billed
Analysis of court order to appear re Supreme Court order reversing dismissal.																
03/19/2019	L250	7461	EBERT A	00007	7th YEAR ASSOCIATE	B	0.50	120.00	240.00	0.50	120.00	240.00	10099	A101	3039019	Billed
Prepare for upcoming status check hearing regarding Supreme Court Order; review order and court minutes, as well as correspondence detailing intention to file dispositive motions.																
03/20/2019	L250	7461	EBERT A	00007	7th YEAR ASSOCIATE	B	0.80	192.00	240.00	0.80	192.00	240.00	10099	A109	3039019	Billed
Attend hearing regarding status check on Supreme Court order and remand issues.																
04/10/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3063002	Billed
Draft correspondence to Glenn Welt answering his question about potential that Redaction																
04/12/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A103	3063002	Billed
Begin drafting 3rd motion to dismiss per anti-SLAPP statutes.																
04/30/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	4.60	1,219.00	265.00	4.60	1,219.00	265.00	10099	A103	3063002	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/13/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Continue drafting third motion to dismiss per NRS 41.660.																
05/01/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	1.30	344.50	265.00	1.30	344.50	265.00	10099	A103	3063002	Billed
Continue drafting third motion to dismiss; add discussion re absolute privilege.																
05/01/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3063002	Billed
Draft correspondence to Glenn Welt answering his questions re Redaction																
05/02/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3063002	Billed
Analysis of correspondence from Glenn Welt approving Redaction																
05/02/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A103	3063002	Billed
Draft alternative motion to dismiss based upon individual causes of action not pleading a claim for relief.																
05/02/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3063002	Billed
Draft correspondence to Glenn Welt re 2 motions to dismiss filed.																
05/06/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A104	3063002	Billed
Analysis of Redaction and potential affects on pending motion to dismiss.																
05/06/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3063002	Billed
Draft correspondence to Glenn Welt re Redaction																
06/05/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Analysis of correspondence from Glenn Welt re potential Redaction																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A104	3087585	Billed
Analysis of Plaintiffs' very late opposition to motion to dismiss.																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.80	212.00	265.00	0.80	212.00	265.00	10099	A101	3087585	Billed
Prepare oral argument for court re why motions to dismiss should be granted despite arguments in late opposition.																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A109	3087585	Billed
Attend hearing on motions to dismiss; court continued them to July 17 due to late opposition.																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt recapping the events at 7/10 hearing on motion to dismiss.																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A103	3087585	Billed
Draft reply supporting motion to dismiss Jenna Shapiro and certain of Howard's causes of action.																
07/10/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.90	238.50	265.00	0.90	238.50	265.00	10099	A103	3087585	Billed
Begin drafting reply brief supporting anti-SLAPP motion to dismiss. Start discussion re why NRS 41.660(3) protects the website.																
07/11/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	2.80	742.00	265.00	2.80	742.00	265.00	10099	A103	3087585	Billed
Begin drafting Welts' written reply to points in Howard's opposition about motion to dismiss. Begin analysis of NRS 41.637(3) and (4) on points in opposition.																
07/12/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	2.10	556.50	265.00	2.10	556.50	265.00	10099	A103	3087585	Billed
Continue drafting Welts' written reply to Howard's opposition. Draft section re Howard cannot prove elements of his claims with clear and convincing evidence.																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Analysis of correspondence from Glenn Welt re today's hearing on 3rd motion to dismiss.																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	159.00	265.00	0.60	159.00	265.00	10099	A101	3087585	Billed

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/15/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
Finalize oral argument preparations based upon concessions in Shapiros' opposition and application to anti-SLAPP statutes.																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.90	238.50	265.00	0.90	238.50	265.00	10099	A109	3087585	Billed
Attend hearing re anti-SLAPP motion. Granted in part, but mostly denied.																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt re Redaction																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	1.70	450.50	265.00	1.70	450.50	265.00	10099	A103	3087585	Billed
Starting drafting order granting in part, but mostly denying, anti-SLAPP motion to dismiss.																
07/17/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt answering his question about Redaction																
07/18/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A107	3087585	Billed
Draft correspondence to Alex Ghibaudo re 1st draft of order on MTD.																
07/22/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	159.00	265.00	0.60	159.00	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt answering his questions about Redaction																
07/22/2019	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A107	3087585	Billed
Draft correspondence to Alex Ghibaudo re terms of potential walkaway dismissal.																
07/23/2019	L160	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt re Redaction																
07/23/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	3087585	Billed
Draft correspondence to Glenn Welt answering his question about Redaction																
07/30/2019	L240	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A107	3087585	Billed
Draft correspondence to Alex Ghibaudo re order on motion to dismiss? settlement walkaway number?																
08/01/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.40	106.00	265.00	0.40	106.00	265.00	10099	A103	0	Unbilled
Begin drafting answer to complaint.																
08/01/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.20	53.00	265.00	0.20	53.00	265.00	10099	A106	0	Unbilled
Draft correspondence to Glenn Welt re Redaction																
08/01/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	0	Unbilled
Analysis of correspondence from Glenn Welt re Redaction																
08/01/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	0	Unbilled
Analysis of correspondence from Glenn Welt providing Redaction																
08/01/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	79.50	265.00	0.30	79.50	265.00	10099	A103	0	Unbilled
Continue drafting answer Redaction																
08/02/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	0	Unbilled
Draft email to Glenn Welt answering his question re Redaction																

[Redaction](#)

[Redaction](#)

Time Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/15/2019

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status
08/09/2019	L210	7465	LOWRY M P	00030	PARTNERS - I	B	0.30	79.50	265.00	0.30	79.50	265.00	10099	A106	0	Unbilled
Draft correspondence to Glenn Welt re family's answer timely filed; court filed formal order denying motion to dismiss; Redaction																
08/12/2019	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	0	Unbilled
Analysis of correspondence from Glenn Welt re potential options for Redaction																
08/13/2019	L460	7465	LOWRY M P	00030	PARTNERS - I	B	2.20	583.00	265.00	2.20	583.00	265.00	10099	A103	0	Unbilled
Begin drafting motion for fees and costs, along with discretionary award, based upon court partially granting motion to dismiss.																
08/13/2019	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.10	26.50	265.00	0.10	26.50	265.00	10099	A106	0	Unbilled
Draft correspondence to Glenn Welt answering his question re Redaction																
08/15/2019	L460	7465	LOWRY M P	00030	PARTNERS - I	B	0.60	159.00	265.00	0.60	159.00	265.00	10099	A103	0	Unbilled
Finalize motion for certain fees and costs.																
Report Totals:							128.50	32,431.00		128.40	32,406.00					

Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Motion
for Attorneys' Fees & to Amend Order Granting Summary
Judgment

A-14-706566-C

Exhibit 4

Wilson Elser Cost Receipts

Cost Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/15/2019

Date	SM/Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.	Check Date	Check Status	Invoice	Status
07/29/2016	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2359284	51334	09/22/2016	Cleared	2707313	Billed
E-Filing 97;DINERS CLUB INTERNATIONAL AUGUST282016 ACCT. ENDING 5754															
11/03/2016	E106	00123	Lexis - Online Research	7465	0.00	34.30	0.00	34.30		0				2707313	Billed
Lexis - Online Research															
12/07/2016	E106	00123	Lexis - Online Research	7465	0.00	0.10	0.00	0.00		0				2715461	Billed
Lexis - Online Research															
02/02/2017	E106	00123	Lexis - Online Research	7465	0.00	0.60	0.00	0.00		0				2744103	Billed
Lexis - Online Research															
02/05/2017	E106	00123	Lexis - Online Research	7465	0.00	4.55	0.00	0.00		0				2744103	Billed
Lexis - Online Research															
02/06/2017	E118	00050	Filing fees	7465	0.00	150.00	0.00	150.00	MICHAEL LOWRY	2408379	170227197	02/27/2017	Cleared	2744103	Billed
Filing fees CR Expense Report / Michael Lowry / Filing fee per NRAP 40 for petition for rehearing															
05/23/2017	E106	00123	Lexis - Online Research	7465	0.00	3.70	0.00	0.00		0				2784892	Billed
Lexis - Online Research															
05/25/2017	E106	00123	Lexis - Online Research	7465	0.00	0.40	0.00	0.00		0				2784892	Billed
Lexis - Online Research															
05/26/2017	E106	00123	Lexis - Online Research	7465	0.00	18.20	0.00	0.00		0				2784892	Billed
Lexis - Online Research															
05/30/2017	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2468745	58444	07/21/2017	Cleared	2796055	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JUNE282017 ACCT ENDING#2194															
06/21/2017	E106	00123	Lexis - Online Research	7465	0.00	16.30	0.00	0.00		0				2796055	Billed
Lexis - Online Research															
06/22/2017	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2468777	58444	07/21/2017	Cleared	2796055	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JUNE282017 ACCT ENDING#2194															
07/09/2017	E106	00123	Lexis - Online Research	7465	0.00	4.05	0.00	0.00		0				2796055	Billed
Lexis - Online Research															
07/10/2017	E118	00134	E-Filing	7499	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2476420	59031	08/15/2017	Cleared	2809364	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JULY282017 ACCT ENDING#2194															
08/07/2017	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2491127	59655	09/15/2017	Cleared	2818660	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL AUG282017 ACCT ENDING#2194															
08/07/2017	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2491138	59655	09/15/2017	Cleared	2818660	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL AUG282017 ACCT ENDING#2194															
08/14/2017	E106	00123	Lexis - Online Research	7465	0.00	3.95	0.00	0.00		0				2809364	Billed

Cost Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/15/2019

Date	SM/Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.	Check Date	Check Status	Invoice	Status
Lexis - Online Research															
08/16/2017	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2491399	59655	09/15/2017	Cleared	2818660	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL AUG282017 ACCT ENDING#2194															
09/21/2017	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2504747	60480	10/19/2017	Cleared	2843001	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL SEPT282017 ACCT ENDING#5754															
09/25/2017	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2504767	60480	10/19/2017	Cleared	2843001	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL SEPT282017 ACCT ENDING#5754															
10/23/2017	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2516830	61371	11/22/2017	Cleared	2843001	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL OCT282017 ACCT ENDING#5754															
10/24/2017	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2516844	61371	11/22/2017	Cleared	2843001	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL OCT282017 ACCT ENDING#5754															
10/24/2017	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2516845	61371	11/22/2017	Cleared	2843001	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL OCT282017 ACCT ENDING#5754															
10/25/2017	E102	00087	Photocopying Charges (outside)	7499	0.00	5.00	0.00	0.00	CASH	2508312	15624	10/27/2017	Cleared	2843001	Billed
Photocopying Charges (outside) 41 PETTY															
10/26/2017	E108	00010	Postage	7465	0.00	1.82	0.00	1.82		0				2843001	Billed
Postage															
11/10/2017	E106	00123	Lexis - Online Research	7465	0.00	16.50	0.00	0.00		0				2843001	Billed
Lexis - Online Research															
01/03/2018	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2546485	63277	02/20/2018	Cleared	2894070	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JAN282018 ACCT ENDING#5754															
01/10/2018	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2546560	63277	02/20/2018	Cleared	2894070	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JAN282018 ACCT ENDING#5754															
01/23/2018	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2546673	63277	02/20/2018	Cleared	2894070	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL JAN282018 ACCT ENDING#5754															
02/09/2018	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2563722	64133	03/27/2018	Cleared	2894070	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL FEB282018 ACCT ENDING#5754															
02/15/2018	E124	00122	Fees for Record Production	7465	0.00	11.25	0.00	0.00	American Legal Services Nevada	2561715	61717	04/17/2018	Cleared	2894070	Billed
Fees for Record Production, A/P Batch - 0266774, American Legal Services Nevada, Invoice # 37014223, Invoice Date 02/15/2018, Deliver order to court for signature.															

Cost Report

Billed and Unbilled

WELT, GLENN / Howard Shapiro v. Glenn Welt / Shapiro, Howard (18875-1)

08/15/2019

Date	SM/Task	Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt	Vendor	Voucher	Check No.	Check Date	Check Status	Invoice	Status
03/09/2018	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2571783	64833	04/20/2018	Cleared	2963000	Billed
E-Filing 96;DINERS CLUB INTERNATIONAL APRIL282018 ACCT ENDING#5754															
03/19/2018	E106	00123	Lexis - Online Research	7465	0.00	4.05	0.00	0.00		0				2894070	Billed
Lexis - Online Research															
09/13/2018	E106	00123	Lexis - Online Research	7465	0.00	0.10	0.00	0.10		0				2989431	Billed
Lexis - Online Research, LAS VEGAS															
04/30/2019	E106	00123	Lexis - Online Research	7465	0.00	33.00	0.00	33.00		0				3063002	Billed
Lexis - Online Research, LAS VEGAS															
05/02/2019	E118	00134	E-Filing	9999	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2734602	74751	06/04/2019	Cleared	3087585	Billed
E-FILING 96;DINERS CLUB INTERNATIONAL MAY282019 ACCT ENDING#5754															
07/11/2019	E106	00123	Lexis - Online Research	7465	0.00	12.15	0.00	12.15		0				3087585	Billed
Lexis - Online Research, LAS VEGAS															
07/12/2019	E118	00134	E-Filing	7465	0.00	3.50	0.00	3.50	DINERS CLUB INTERNATIONAL	2763325	76377	08/12/2019		0	Unbilled
E-FILING 96;DINERS CLUB INTERNATIONAL JULY282019 ACCT ENDING#5754															
07/17/2019	E106	00123	Lexis - Online Research	7465	0.00	3.95	0.00	3.95		0				3087585	Billed
Lexis - Online Research, LAS VEGAS															
Report Totals:					0.00	390.47	0.00	301.82							

Odyssey File & Serve - Envelope Receipt

120

Page 1 of 2

Envelope Information

Envelope Id

1359809

Submitted Date

8/15/2017 6:28 PM PST

Submitted User

Name

michael.lowry@wilsonelser.com

Case Information

Location

Department 27

Category

Civil

Case Type

Other Civil Matters

Case Initiation Date

9/4/2014

Case #

A-14-706566-C

Assigned to Judge

Alif, Nancy

Filings

Filing Type

EFileAndServe

Filing Code

Motion for Attorney Fees and Costs
- MAFC

Filing Description

Glenn Welt, Rhoda Welt, Lynn Welt
& Michele Welt's Motion for
Attorneys' Fees & to Amend Order
Granting Summary Judgment

Client Reference

Number

18875.00001 7465

Filing on Behalf of

Glen Welt

Filing Status

Accepted

Accepted Date

8/16/2017 4:12 PM PST

Lead Document

File Name

Motion.pdf

Security

Public Filed Document

Download

Original File
Court Copy

9/20/2017

Odyssey File & Serve - Envelope Receipt

156

Envelope Information

Envelope Id

1523020

Submitted Date

9/20/2017 4:21 PM PST

Submitted User Name

pamela.lamper@wilsonelser.com

Case Information

Location

Department 27

Category

Civil

Case Type

Other Civil Matters

Case Initiation Date

9/4/2014

Case #

A-14-706566-C

Assigned to Judge

Alf, Nancy

Filings

Filing Type

EFileAndServe

Filing Code

Order Granting Motion - OGM

Filing Description

Amended Order Granting Glenn Welt,
Rhoda Welt, Lynn Welt & Michele Welt's
Renewed Motion to Dismiss

Client Reference Number

18875117465

Courtesy Copies

pamela.lamper@wilsonelser.com

Filing on Behalf of

Glen Welt, Rhoda Welt, Lynn Welt, Michele
Welt

Filing Status

Submitting

2504747

Lead Document

File Name

Amended Order Granting Renewed
MTN to Dismiss - Shapiro.pdf

Security**Download**

Original File

eService Details

Status

Not Sent

Name

Alex Ghibaudo

Firm

G Law

Served

No

Date Opened

Not Opened

9/20/2017

Odyssey File & Serve - Envelope Receipt

156

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	Glen Welt
Payment Account	WEMED Diners Club
Filing Attorney	Michael Lowry
Transaction Response	Authorized

Transaction Amount	\$3.50
Transaction Id	2074939
Order Id	001523020-0

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Version: 3.16.2.5794

169

Envelope Information

Envelope Id

1537292

Submitted Date

9/25/2017 9:31 AM PST

Submitted User Name

pamela.lamper@wilsonelser.com

Case Information

Location

Department 27

Category

Civil

Case Type

Other Civil Matters

Case Initiation Date

9/4/2014

Case

A-14-706566-C

Assigned to Judge

Allf, Nancy

Filings

Filing Type

EFileAndServe

Filing Code

Notice of Entry of Order - NEOJ

Filing Description

Notice of Entry of Amended Order

Client Reference Number

6876;1-7465

Courtesy Copies

alex@abgpc.com; danielle@abgpc.com;

maryam@abgpc.com;

pamela.lamper@wilsonelser.com

Filing on Behalf of

Glen Welt, Rhoda Welt, Lynn Welt, Michele Welt

Filing Status

Submitting

2504767

Lead Document

File Name

NTC of Entry of Amended Order -
Shapiro.pdf

Security

Download

Original File

eService Details

Status	Name	Firm	Served	Date Opened
Not Sent	Alex Ghibaudo	G Law	No	Not Opened

9/25/2017

Odyssey File & Serve - Envelope Receipt

169

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

Glen Welt

Transaction Amount

\$3.50

Payment Account

WEMED Diners Club

Transaction Id

2092067

Filing Attorney

Michael Lowry

Order Id

001537292-0

Transaction Response

Authorized

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Version: 3.16.2.5794

Envelope Information

Envelope Id
1683351**Submitted Date**
10/20/2017 4:18 PM PST**Submitted User Name**
naomi.sudranski@wilsonelsa.com

Case Information

Location
Department 27**Category**
Civil**Case Type**
Other Civil Matters**Case Initiation Date**
9/4/2014**Case #**
A-14-706568-C**Assigned to Judge**
AJH, Nancy

Party Information

Party Type	Party Name	Lead Attorney
Defendant	Glen Welt	
Plaintiff	Howard Shapiro	Pro Se (+1 more)
Plaintiff	Jenna Shapiro	Pro Se (+1 more)

Filings

Filing Code	Client Ref #	Filing Description
Stipulation and Order - SAO	18875.00001 7465	Stipulation and Order for Second Amended...
Amended Order - AMOR	18875.00001 7465	Second Amended Order Granting Glenn W...

Filing Details

Filing Type
EFileAndServe**Filing Code**
Stipulation and Order - SAO**Filing Description**
Stipulation and Order for Second
Amended Order Granting Glenn Welt,
Rhoda Welt, Lynn Welt & Michele Welt's
Renewed Motion to Dismiss**Client Reference Number**
18875.00001 7465**Filing on Behalf of**
Rhoda Welt, Lynn Welt, Michele Welt**Filing Status**
Accepted**Accepted Date**
10/23/2017 10:34 AM PST

2516830

Stamped Documents

This is a collection of the court copies for this filing

▶ Party: Jenna Shapiro - Plaintiff

▼ Other Service Contacts

E-File Desk .	EfileLasVegas@wilsonelser.com
Michael P Lowry .	michael.lowry@wilsonelser.com
Naomi Sudranski .	naomi.sudranski@wilsonelser.com

Parties with No eService

Name	Address
Glen Welt	
Jenna Shapiro	623 Skyline DR Lake Hopatcong New Jersey 07849

Fees

▼ Stipulation and Order - SAO

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

▼ Amended Order - AMOR

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	Michele Welt	Transaction Amount	\$3.50
Payment Account	WEMED Diners Club	Transaction Id	2238830
Filing Attorney	Michael Lowry	Order Id	001663351-0
Transaction Response	Payment Complete		

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Case Information

Location
Department 27

Category
Civil

Case Type
Other Civil Matters

Case Initiation Date
9/4/2014

Case #
A-14-708568-C

Assigned to Judge
Allif, Nancy

Party Information

Party Type	Party Name	Lead Attorney
Defendant	Glen Welt	
Plaintiff	Howard Shapiro	Pro Se (+1 more)
Plaintiff	Jenna Shapiro	Pro Se (+1 more)

Filings

Filing Code	Client Ref #	Filing Description
Notice of Entry of Stipulation and Order -...	18875.00001 7465	Notice of Entry of Stipulation and Order

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Parties with No eService

Name	Address
Glen Welt	
Jenna Shapiro	623 Skyline DR Lake Hopatcong New Jersey 07849

Fees

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Case Information

Location
Department 27

Category
Civil

Case Type
Other Civil Matters

Case Initiation Date
9/4/2014

Case #
A-14-706566-C

Assigned to Judge
Allif, Nancy

Party Information

Party Type	Party Name	Lead Attorney
Defendant	Glen Welt	
Plaintiff	Howard Shapiro	Pro Se (+1 more)
Plaintiff	Jenna Shapiro	Pro Se (+1 more)

Filings

Filing Code	Client Ref #	Filing Description
Notice of Entry of Order - NEOJ	18875.00001 7465	Notice of Entry of Order

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Parties with No eService

Name	Address
Glen Welt	
Jenna Shapfro	623 Skyline DR Lake Hopatcong New Jersey 07849

Fees

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Wilson Elser Moskowitz & Edelman

Receipt No.
2017-81680-CCCLK

Transaction Date
10/25/2017

Description	Amount Paid
Shapiro, Howard	
A-14-706566-C	
Howard Shapiro, Plaintiff(s) vs. Glen Welt, Defendant(s)	
12A Certification of Copy --- Civil fee sch	5.00
SUBTOTAL	5.00
Remaining Balance Due: \$0.00	

PAYMENT TOTAL **5.00**

Cash Tendered	5.00
Total Tendered	5.00
Change	0.00

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PLAINTIFF/ESTATE OF: Howard Shapiro
DEFENDANT: Glen Welt

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Second Amended Order Granting Glenn Welt, Rhoda Welt, Lynn Welt & Michele Welt's Renewed Motion to Dismiss

Filed On: 10/20/2017

Date Requested: 10/25/2017

Date Required: _____

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Location
Department 27**Category**
Civil**Case Type**
Other Civil Matters**Case Initiation Date**
9/4/2014**Case #**
A-14-706586-C**Assigned to Judge**
Allf, Nancy

Party Information

Party Type	Party Name	Lead Attorney
Defendant	Glen Welt	
Plaintiff	Howard Shapiro	Pro Se (+1 more)
Plaintiff	Jenna Shapiro	Pro Se (+1 more)

Filings

Filing Code	Client Ref #	Filing Description
Order - ORDR (CIV)	18875.00001 7465	Order re Plaintiffs' Motion to St...

Filing Details

Filing Type
EFileAndServe**Filing Code**
Order - ORDR (CIV)**Filing Description**
Order re Plaintiffs' Motion to
Stay Proceedings and to Waive
Supersedeas Bond

2546485

**Client Reference
Number**

18875.00001 7465

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Sent	Joslyne Simmons	Alex B. Ghibauda, P.C.
Sent	E-File Desk .	
Sent	Michael P Lowry .	
Sent	Naomi Sudranski .	
Error	Danielle Alvarado	G Law
Error	Maryam Sabitian	G Law

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Filing Attorney	Michael Lowry	Order Id	001949436-0
Transaction Response	Payment Compl...		

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Case Information

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Department 27**Category**
Civil**Case Type**
Other Civil Matters**Case Initiation Date**
9/4/2014**Case #**
A-14-706566-C**Assigned to Judge**
Alf, Nancy

Filings

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Notice of Entry of Order - NEOJ
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Notice of Entry of Order**Client Reference Number**
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Civil**Case Type**
Other Civil Matters**Case Initiation Date**
9/4/2014**Case #**
A-14-706566-C**Assigned to Judge**
Allf, Nancy

Party Information

Party Type	Party Name	Lead Attorney
Defendant	Glen Welt	
Plaintiff	Howard Shapiro	Pro Se (+1 more)
Plaintiff	Jenna Shapiro	Pro Se (+1 more)

Filings

Filing Code	Client Ref #	Filing Description
Opposition to Motion - OPPM...	18875.00001 7465	Defendants' Opposition to Ren...

Filing Details

Filing Type
EFileAndServe**Filing Code**
Opposition to Motion - OPPM
(CIV)**Filing Description**
Defendants' Opposition to
Renewed Motion to Stay

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CivilCase Type
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9/4/2014Case #
A-14-706566-CAssigned to Judge
Alif, Nancy

Filings

Filing Type
EFileAndServeFiling Code
Order - ORDR (CIV)Filing Description
Order re Plaintiffs' Renewed Motion
to Stay Proceedings and to Waive
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Name **Address**
 Glen Welt

Name **Address**
 Jenna Shapiro 623 Skyline DR Lake Hopatcong
 New Jersey 07849

Fees

Order - ORDR (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

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Payment Account	WEMED Diners Club	Transaction Id	2756706
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Case Information

Location
Department 27Category
CivilCase Type
Other Civil MattersCase Initiation Date
9/4/2014Case #
A-14-706566-CAssigned to Judge
Alif, Nancy

Filings

Filing Type
EFileAndServeFiling Code
Notice of Entry of Order - NEOJ
(CIV)Filing Description
Notice of Entry of OrderClient Reference Number
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Status	Name	Firm	Served	Date Opened
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Not Sent	Michael P Lowry .		No	Not Opened
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Parties with No eService

Name **Address**
Glen Welt

Name **Address**
Jenna Shapiro 623 Skyline DR Lake Hopatcong
New Jersey 07849

Fees

Notice of Entry of Order - NEOJ (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	Glen Welt	Transaction Amount	\$3.50
Payment Account	WEMED Diners Club	Transaction Id	2904828
Filing Attorney	Michael Lowry	Order Id	002251743-0
Transaction Response	Authorized		

27

Case # A-14-706566-C - Howard Shapiro, Plaintiff(s) vs. Gl

Envelope Information

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4236401

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5/2/2019 2:11 PM PST

Submitted User

Name

cynthia.kelley@wilsonelser.com

Case Information

Location

Department 27

Category

Civil

Case Type

Other Civil Matters

Case Initiation Date

9/4/2014

Case #

A-14-706566-C

Assigned to Judge

Allf, Nancy

Filings

Filing Type

EFileAndServe

Filing Code

Motion to Dismiss - MDSM (CIV)

Filing Description

Glenn Welt, Rhoda Welt, Lynn Welt
& Michele Welt's Motion to Dismiss
Certain Causes of Action

Client Reference

Number

18875.01 Shapiro v Welts

Filing on Behalf of

Glen Welt

Filing Status

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5/2/2019 2:15 PM PST

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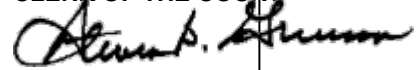
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Party Responsible for Fees	Glen Welt	Transaction Amount	\$3.50
Payment Account	WEMED Diners Club	Transaction Id	5171522
Filing Attorney	Michael Lowry	Order Id	004238401-0
Transaction Response	Payment Complete		

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EXHIBIT B



OPPS

Alex Ghibauda, Esq.
Bar No. 10592
ALEX B. GHIBAUDO, PC.
703 South 8th St.
Las Vegas, Nevada 89101
T: (702) 978-7090
F: (702) 924-6553
Email: alex@abgpc.com
Attorney for Plaintiff

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

HOWARD SHAPIRO et al.,

Plaintiff,

vs.

GLEN WELT et al.,

Defendants.

Case No.: A-14-706566-C

Dist. Ct. Dept. No.: 27

**OPPOSITION TO DEFENDANTS'
MOTION**

Plaintiff Howard Shapiro ("Howard"), through his counsel Alex B. Ghibauda, Esq. of the law firm Alex B. Ghibauda, PC, **hereby opposes Defendants' motion for attorney's fees, costs and discretionary relief.** This motion is based on the following Memorandum of Points and Authorities, the papers and pleadings already on file herein, the attached affidavits, if any, and any oral argument the court may permit at the hearing of this Motion.

Dated this 2nd day of October, 2019.

/s/ Alex Ghibauda

Alex B. Ghibauda, Nevada State Bar No. 10592
ALEX B. GHIBAUDO, PC
Attorney for Plaintiff Howard Shapiro

MEMORANDUM OF POINTS AND AUTHORITIES

Defendants have filed a motion for attorney’s fees and costs pursuant to NRS 41.670(1)(a) alleging that they are entitled to attorney’s fees and costs because Defendants’ motion to dismiss was granted in part as to Jenna Shapiro. However, Mrs. Shapiro was not dismissed on the merits. Rather, after 5 years of litigation, she opted to end any further participation in this case. Mr. Lowry was informed of that even prior to the time that the latest motion to dismiss was filed on Defendants behalf. Indeed, the minutes to the August 1, 2019 hearing reflect as much when those minutes state that the “Motion to Dismiss re NRS 41.660 GRANTED IN PART for those causes of action the Plaintiff does not intend to pursue, Jenna Shapiro will be dismissed...” (emphasis added).

To be clear, it was undersigned counsel’s intent to communicate to the court that Mrs. Shapiro simply voluntarily dismissed the action as to her, pursuant to NRCP 41, not that she concedes that Defendants’ motion had any merit at all because it did not, as the Nevada Supreme Court affirmed on two occasions.

Furthermore, the causes of action that Howard Shapiro dismissed (extortion, fraud, punitive damages) were not related to Defendants’ good faith communication in furtherance of their right to petition or speech. Therefore, the dismissal of those causes of action do not fall under the purview of NRS 41.660.

CONCLUSION

Defendants' instant motion should be denied because: (1) Defendants' motion to dismiss was not granted on the merits; and (2) the causes of action Howard Shapiro dismissed had nothing to do with free speech rendering NRS 41.660 inapplicable.

Respectfully submitted this 2nd day of October, 2019.

/s/ Alex Ghibaudo

ALEX B. GHIBAUDO, Nevada Bar No. 10592

ALEX B. GHIBAUDO, PC

703 S. 8th Street

Las Vegas, Nevada 89101

Attorney for Plaintiff Howard Shapiro

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, I hereby certify that on
3 this 3rd day of October, 2019, I did cause a true copy of the foregoing OPPOSITION TO
4 DEFENDANTS' MOTION in *Shapiro v. Welt et al.*, Clark County District Court Case No.
5 A-18-779200-C, to be served electronically using the Wiznet Electronic Service system, to
6 all parties with an email address on record.

7 Michael Lowry, Esq.
8 **WILSON ELSE ET AL**
9 300 South 4th Street, 11th Floor
Las Vegas, Nevada 89101

Michael.lowry@wilsonelser.com

10
11 /s/ Alex Ghibaud

12 EMPLOYEE of Alex B. Ghibaud, PC
13
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EXHIBIT C



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

DISTRICT COURT
CLARK COUNTY, NEVADA

HOWARD SHAPIRO and JENNA SHAPIRO, Case A-14-706566-C
Dept. 27

Plaintiffs,

vs.

**Glenn Welt, Rhoda Welt, Lynn Welt &
Michele Welt's Reply re Motion for Fees,
Costs, and Discretionary Relief**

GLEN WELT, RHODA WELT, LYNN WELT,
MICHELLE WELT, individuals;
CHECKSNET.COM, a corporation; DOES I
through X, and ROE CORPORATIONS I
through X, inclusive,

Defendants.

Plaintiffs' opposition ignores reality in an attempt to escape responsibility for their choices. Plaintiffs' filed this suit. They decided what facts to allege and what causes of action to bring. They decided to pursue it for five years despite the Welts' consistent arguments that Jenna had no claims for relief and that at least four of Howard's six causes of action were not viable. They then decided to *not oppose* the third motion to dismiss on these grounds. Each of these decisions comes with risks, rewards, and consequences. The Shapiros are now just trying to escape the consequences of pursuing meritless claims for five years.

The Welts' motion is well supported in fact and law. It should be granted.

///

///

1 DATED this 4th day of October, 2019.



3
4 BY: /s/ Michael P. Lowry
5 MICHAEL P. LOWRY
6 Nevada Bar No. 10666
7 300 South 4th Street, 11th Floor
8 Las Vegas, NV 89101-6014
9 Tel: 702.727.1400/Fax: 702.727.1401
10 Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
11 Michelle Welt

12
13 **Memorandum of Points & Authorities**

14 **I. NRS 41.670(1)(a) is unambiguous and requires an award of all reasonable fees.**

15 “If the court grants a special motion to dismiss filed pursuant to NRS 41.660: (a) The
16 court shall award reasonable costs and attorney’s fees to the person against whom the action was
17 brought....”¹ Here, the Welts filed a special motion to dismiss. That motion was granted in full
18 as to Jenna Shapiro. It was granted as to four of Howard’s six causes of action. As a result, an
19 award of reasonable costs and fees is mandated on those parts that were granted.

20 **a. Jenna chose not to oppose a valid motion.**

21 Jenna Shapiro opposes with two arguments. She first argues that she “was not dismissed
22 on the merits. Rather, after 5 years of litigation, she opted to end any further participation in this
23 case.”² She relies upon court minutes rather than the court’s written order. However, the
24 Supreme Court of Nevada has expressly determined a ““court’s oral pronouncement from the
25 bench, the clerk’s minute order, and even an unfiled written order are ineffective for any
26 purpose.””³

27 Once the opposing party enters an appearance, there are only two ways out of a lawsuit:
28 1) a stipulation to dismiss; or 2) dismissal via motion. Jenna Shapiro got neither. Instead, she

¹ NRS 41.670(1)(a).

² Opposition at 2:6-7.

³ *Div. of Child & Family Servs. v. Dist. Ct.*, 120 Nev. 445, 451, 92 P.3d 1239, 1243 (2004)
(quoting *Rust v. Clark Cty. School District*, 103 Nev. 686, 689, 747 P.2d 1380, 1382 (1987)).

1 received the Welts motion to dismiss and decided not to oppose it. That was her choice and she
2 gets to live with the consequences of her choice. Perhaps had she actually proposed a stipulation
3 to dismiss, the Welts might have considered it.

4 Jenna's argument also ignores the fact that she sued the Welts for accurately stating the
5 fact she is married to Howard. The Welts have presented that argument since December, 2014.
6 Yet Jenna still pursued the Welts for five years before finally not opposing the third motion to
7 dismiss.⁴ That conduct is *exactly* what NRS 41.660 is intended to deter. "A SLAPP suit is a
8 meritless lawsuit that a party initiates primarily to chill a defendant's exercise of his or her First
9 Amendment free speech rights."⁵ "The hallmark of a SLAPP lawsuit is that it is filed to obtain a
10 financial advantage over one's adversary by increasing litigation costs until the adversary's case
11 is weakened or abandoned."⁶ She sued the Welts for five years because they told the truth. The
12 fact that she finally decided to stop does not save her from the consequences of that choice.

13 Ruling as Jenna proposes would gut the remedy NRS 41.660 was designed to provide as
14 the plaintiff filing a SLAPP lawsuit could avoid the statute's deterrent effects by unilaterally
15 abandoning the case.

16 **b. Jenna could not voluntarily dismiss.**

17 Her second argument is that she planned to dismiss per Rule 41. She seems to argue that
18 she could unilaterally dismiss herself from the lawsuit at any time. However, the procedural
19 posture of the case did not allow a unilateral, voluntary dismissal per Rule 41(a)(1)(A). Again,
20 the only way out for her was either via a stipulation or motion. She pursued neither.

21 **c. Howard's dismissed causes of action all related to protected activity.**

22 Howard pled six causes of action. He chose not to oppose the Welts motion to dismiss as
23 to four of those six causes of action. He now argues that three of those he conceded, "(extortion,
24 fraud, punitive damages) were not related to Defendants' good faith communication in
25 furtherance of their right to petition or speech,"⁷ so the Welts are ineligible for an award of fees
26

27 ⁴ July 9, 2019 opposition at 10:2-3.

28 ⁵ *Stubbs v. Strickland*, 129 Nev. Adv. Op. 15, 297 P.3d 326, 329 (2013) (citations omitted).

⁶ *John v. Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 752, 219 P.3d 1276, 1280 (2009).

⁷ Opposition at 2:17-19.

1 and costs. In so arguing, Howard implicitly concedes at least the defamation cause of action was
2 related. Howard's 50% share of the fees and costs is \$32,156.61, one sixth of that is \$5,359.44.
3 That much should be summarily awarded.

4 However, Howard's arguments as to the extortion, fraud, and punitive damages causes of
5 action directly conflict with the allegations he pursued for five years. Paragraphs 7 through 23 in
6 the complaint he filed on September 4, 2014 pled a single common fact pattern that related
7 *entirely* to the website that is at the center of this case. Each cause of action then incorporated
8 those facts as pled without adding anything new. Howard cannot stick his head in the sand five
9 years later and pretend something else happened so he can avoid responsibility for \$21,435.60 in
10 fees and costs his complaint caused.

11 **d. The Welts request the award be increased \$106.**

12 This motion was filed on August 16, 2019, and noticed that same day for hearing on
13 September 19, 2019. On September 11, 2019 the parties emailed with the court and agreed to
14 move the hearing to October 3 at 9:30 a.m., at the Shapiros' request. Yet Plaintiffs did not
15 oppose this motion until October 3 at 3:01 a.m. Plaintiffs' counsel did not appear for the
16 hearing, instead emailing the Welts' counsel indicating he had a conflicting hearing in North Las
17 Vegas. The court elected to continue the hearing to October 10, over the Welts' objections.

18 The Welts were billed 0.4 for attending this hearing that ultimately served no purpose.
19 The hearing had no purpose because of the Shapiros' actions. The award should be increased by
20 \$106.00 (\$265 x 0.4) to offset this waste of time.

21 **II. The Welts' motion should be granted.**

22 The Shapiros do not oppose any other aspect of the motion. They concede the fees and
23 costs are reasonable. They concede the statute's language is mandatory. They do not dispute the
24 method by which the Welts apportioned the fees or costs. Their objections are unpersuasive.

25 The court should enter a judgment in the Welts' favor as below:

- 26 • Jenna Shapiro, individually: \$32,209.61 (Fees & Costs)
- 27 • Jenna Shapiro, individually: \$10,000 to Glenn Welt, Rhoda Welt, Lynn Welt, and
- 28 Michele Welt, each, per NRS 41.660(1)(b).

- Howard Shapiro, individually: \$21,488.60 (Fees & Costs)
- Howard Shapiro, individually: \$10,000 to Glenn Welt, Rhoda Welt, Lynn Welt, and Michele Welt, each, per NRS 41.660(1)(b).

DATED this 4th day of October, 2019.



BY: /s/ Michael P. Lowry
MICHAEL P. LOWRY
Nevada Bar No. 10666
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

1 **CERTIFICATE OF SERVICE**

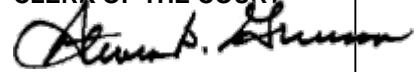
2 Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz
3 Edelman & Dicker LLP, and that on October 4, 2019, I served **Glenn Welt, Rhoda Welt, Lynn**
4 **Welt & Michele Welt's Reply re Motion for Fees, Costs, and Discretionary Relief** as
5 follows:

- 6 ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed
7 envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- 8 ☒ via electronic means by operation of the Court's electronic filing system, upon
9 each party in this case who is registered as an electronic case filing user with the
10 Clerk;

11 Alex B. Ghibaud, Esq.
12 G Law
13 7720 Cimarron Rd., Suite 110B
14 Las Vegas, NV 89113
15 Tel: 702.778.1238
16 *Attorney for Plaintiffs*

17 BY: /s/ Cynthia Kelley
18 An Employee of
19 WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP
20
21
22
23
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EXHIBIT D



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

Howard Shapiro and Jenna Shapiro,
Plaintiffs,

vs.

Glenn Welt, Rhoda Welt, Lynn Welt, Michelle Welt,
individuals; Checksnet.com, a corporation; Does I
through X, and Roe Corporations I through X,
inclusive,

Defendants.

Case No.: A-14-706566-C
Dept. No.: 27

**Notice of Entry of Order re Motion for
Fees, Costs and Discretionary Relief**

PLEASE TAKE NOTICE that an Order granting Defendants Glenn Welt, Rhoda Welt, Lynn Welt & Michelle Welt's Motion for Fees, Costs, and Discretionary Relief was entered by the Court on December 23, 2019. A true and correct copy is attached hereto as Exhibit A.

DATED this 26th day of December, 2019.



BY: /s/ Michael P. Lowry

MICHAEL P. LOWRY
Nevada Bar No. 10666
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

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Certificate of Service

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on December 26, 2019, I served **Notice of Entry of Order re Motion for Fees, Costs and Discretionary Relief** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

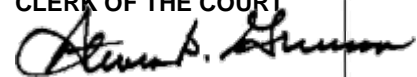
Alex B. Ghibaudo G Law 7720 Cimarron Rd., Suite 110B Las Vegas, NV 89113 Tel: 702.778.1238/Fax: 702.924.6553 E-mail: alex@alexglaw.com Attorneys for Howard Shapiro and Jenna Shapiro	
--	--

BY: /s/ Cynthia Kelley
An Employee of



Exhibit A

Exhibit A



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
300 South 4th Street, 11th Floor
Las Vegas, NV 89101-6014
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt;
Michelle Welt

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Howard Shapiro and Jenna Shapiro,

Plaintiffs,

vs.

Glenn Welt, Rhoda Welt, Lynn Welt, Michelle Welt,
individuals; Checksnet.com, a corporation; Does I
through X, and Roe Corporations I through X,
inclusive,

Defendants.

Case No.: A-14-706566-C
Dept. No.: 27

**Order re Glenn Welt, Rhoda Welt,
Lynn Welt & Michelle Welt's Motion
for Fees, Costs, and Discretionary
Relief**

On August 7, 2019 the court entered an order granting, in part, relief per NRS 41.660. Specifically, it was granted as to Jenna Shapiro because she conceded she cannot meet her burden of proof as to NRS 41.660. The motion was granted in part as to Howard Shapiro because he conceded he could not meet the burden as to four of the six causes of action alleged in the complaint. This was confirmed in open court on July 17.

As a result of this ruling, on August 16, 2019 the Welts filed a motion seeking fees, costs, and discretionary relief. The motion was originally scheduled for hearing on September 19. The parties then stipulated to continue the hearing to October 3. Plaintiffs did not file an opposition to the motion until October 3. As a result the court continued the hearing to October 10, 2019. Michancy Cramer appeared at the hearing for the Shapiros, Michael Lowry appeared for the Welts.

"If the court grants a special motion to dismiss filed pursuant to NRS 41.660: (a) The court shall award reasonable costs and attorney's fees to the person against whom the action was

1 brought....”¹ Here, the Welts filed a special motion to dismiss. That motion was granted in full as
2 to Jenna Shapiro. It was granted as to four of Howard’s six causes of action. As a result, an
3 award of reasonable costs and fees is mandated on those parts that were granted.

4 **A. The *Brunzell* factors are satisfied.**

5 NRS 41.670(1)(a) permits an award of only “reasonable” attorney’s fees. *Brunzell v.*
6 *Golden Gate Nat. Bank* provides the analysis by which to evaluate if the attorneys’ fees were
7 reasonable. *Brunzell* requires district courts to consider at least four factors.

- 8 (1) the qualities of the advocate: his ability, his training, education, experience,
9 professional standing and skill;
10 (2) the character of the work to be done: its difficulty, its intricacy, its importance,
11 time and skill required, the responsibility imposed and the prominence and character
12 of the parties where they affect the importance of the litigation;
13 (3) the work actually performed by the lawyer: the skill, time and attention given to
14 the work;
15 (4) the result: whether the attorney was successful and what benefits were derived.²

16 These factors help evaluate whether the attorney’s fees requested are appropriate for the facts and
17 circumstances of the individual case. They are designed to protect opposing parties from
18 exorbitant rates from less qualified lawyers, dubious billing activities, or poor quality work. The
19 court previously addressed these factors in two prior orders granting attorneys’ fees concerning
20 two prior motions to dismiss. The analysis remains largely the same.

21 The Welts’ lead counsel, Michael Lowry, is a licensed attorney practicing in Nevada since
22 2007 and has represented the Welts since this case was filed. He charged \$250 per hour until
23 January 1, 2018 when the rate increased to \$265. Associate Amanda Ebert has practiced in
24 Nevada since 2012 and was billed at \$225 an hour until January 1, 2018 when her rate also
25 increased to \$240. These differing rates reflected the attorneys’ differing experience levels.

26 As the February 20, 2015 order noted, “[t]he character of the work done was intricate, and
27 required research into a developing area of law.”³ This analysis still applies. This case has been
28 appealed to the Supreme Court twice already. This area of law has produced several published
decisions recently and this was reflected in the Welts’ work product. This analysis also satisfies

¹ NRS 41.670(1)(a).

² *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

³ February 20, 2015 Order at 2:1-2.

1 the third *Brunzell* factor as the work actually performed reflects a level of skill, time, and attention
2 that matches the intricate nature the analysis that was required.

3 Finally, the fourth factor is also satisfied. Part of the Welts' position was successfully
4 advocated, resulting in a favorable decision. The decision benefitted the Welts in that it
5 terminated Jenna's claims against them and limited the remaining claims that Howard asserts.

6 **B. Apportioning the fees and costs requested.**

7 The Welts provided supporting documentation indicating they incurred total fees of
8 \$62,906, and total costs of \$1,407.22. The court is satisfied those amounts were actually and
9 reasonably incurred. The more difficult question is how to apportion these amounts where the
10 motion to dismiss was granted in part. NRS 41.670 provides no guidance in this scenario, nor did
11 the parties locate Nevada case law on point.

12 During the October 10, 2019, hearing, the court stated that, as a condition of the motion
13 being granted, the Welts were to review the billing statements submitted and attempt to determine
14 which ones related to work concerning Jenna as opposed to Howard. The Welts did so, but filed a
15 declaration of counsel on November 6, 2019, explaining why that attempt was unsuccessful and
16 neither the fees nor costs requested could be apportioned in this manner.

17 As a result, the court is persuaded the method of apportionment proposed in the Welts'
18 opening brief is equitable under the circumstances.

19 **C. Discretionary relief per NRS 41.670(1)(b).**

20 The Welts also requested discretionary relief per this statute. "The court may award, in
21 addition to reasonable costs and attorney's fees awarded pursuant to paragraph (a), an amount of
22 up to \$10,000 to the person against whom the action was brought."⁴ The court agrees with the
23 Welts' reasoning as to why an award is merited, but disagrees with them as to the amount. The
24 court instead awards \$100 to each defendant from Jenna Shapiro and a separate \$100 to each
25 defendant from Howard Shapiro.

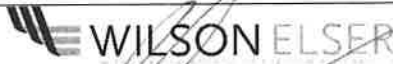

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⁴ NRS 41.660(1)(b).

D. Judgment

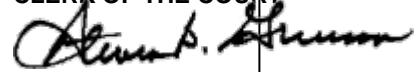
Judgment for fees and costs is entered as follows:

- Jenna Shapiro, individually: \$32,261.61 (Fees & Costs)
- Jenna Shapiro, individually: \$100.00 to Glenn Welt, Rhoda Welt, Lynn Welt, and Michele Welt, each, per NRS 41.660(1)(b).
- Howard Shapiro, individually: \$21,440.60 (Fees & Costs)
- Howard Shapiro, individually: \$100.00 to Glenn Welt, Rhoda Welt, Lynn Welt, and Michele Welt, each, per NRS 41.660(1)(b).

<p>ALEX B. GHIBAUDO, P.C.</p> <p><i>Approval declined.</i></p> <p>BY: _____</p> <p>ALEX GHIBAUDO Nevada Bar No. 10592 703 S. 8th St. Las Vegas, NV 89101 Attorneys for Howard Shapiro; Jenna Shapiro</p>	<p> WILSON ELSER</p> <p>BY: _____</p> <p>MICHAEL P. LOWRY Nevada Bar No. 10666 300 South 4th Street, 11th Floor Las Vegas, NV 89101-6014 Attorneys for Glenn Welt; Rhoda Welt; Lynn Welt; Michelle Welt</p>
	<p>It is so ordered.</p> <p></p> <p>DISTRICT JUDGE</p>

12/21/19 JD

EXHIBIT E



1 **NOAS**

2 Alex Ghibaud, Esq.

3 Bar No. 10592

4 **ALEX B. GHIBAUDO, PC.**

5 703 South 8th St.

6 Las Vegas, Nevada 89101

7 T: (702) 978-7090

8 F: (702) 924-6553

9 Email: alex@abgpc.com

10 *Attorney for Plaintiff*

11 **DISTRICT COURT, FAMILY DIVISION**

12 **CLARK COUNTY, NEVADA**

13 **HOWARD SHAPIRO,**

Dist. Ct. No.: A-14-706566-C

14 Plaintiff,

Dist. Ct. Dept. No.: XXVII

15 vs.

16 **NOTICE OF APPEAL**

17 **GLEN WELT et al.,**

18 Defendants.

19 COMES NOW Plaintiff Howard Shapiro, (hereinafter referred to as "Plaintiff"), by
20 and through his attorney of record, ALEX B. GHIBAUDO, ESQ., of the law firm of ALEX
21 B. GHIBAUDO, P.C., and pursuant to the Nevada Rule of Appellant Procedure 3, files the
22 following Notice of Appeal from the above-captioned Court's Order granting Defendant's
23 motion for attorney's fees and costs pursuant to Nevada's Anti-SLAPP statute (NRS
24 41.660), electronically filed on December 23, 2019.

25 ///

26 ///



1 The decision granting that motion was made on October 10, 2019. Notice of entry of that
2 order was filed on December 26, 2019.

3 DATED this 6th day of January, 2020.

4 ALEX B. GHIBAUDO, P.C.

6 By: /s/ Alex B. Ghibaudo, Esq.

7 Alex B. Ghibaudo, Esq.
8 Nevada Bar No.: 010592
9 703 S. 8th Street
10 Las Vegas, Nevada 89101
11 Attorney for *Plaintiff*

ALEX B. GHIBAUDO, PC
703 S. 8th STREET
LAS VEGAS, NV 89101
(702) 978-7090(T) / (702) 924-6553 (F)
WWW.GLAWVEGAS.COM



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of January, 2020, I served a true and correct copy of the foregoing **NOTICE OF APPEAL**, via the Court designated electronic service, addressed to the following:

Michael Lowry, Esq.
Michael.lowry@wilsonelser.com

By: /s/ Alex Ghibaud
An Employee of ALEX B. GHIBAUDO, P.C.

ALEX B. GHIBAUDO, PC
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