

IN THE SUPREME COURT OF NEVADA

PANORAMA TOWERS CONDOMINIUM
UNIT OWNERS' ASSOCIATION, a Nevada
non-profit corporation,

Appellant,

vs.

LAURENT HALLIER, an individual;
PANORAMA TOWERS I, LLC, a Nevada
limited liability company; PANORAMA
TOWERS I MEZZ, LLC, a Nevada limited
liability company; and M.J. DEAN
CONSTRUCTION, INC., a Nevada
corporation,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

from the Eighth Judicial District Court, Clark County, Nevada
The Honorable Susan H. Johnson, District Judge
District Court Case No. A-16-744146-D

APPELLANT'S APPENDIX VOL 19 OF 27

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				Hours	
			CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104	REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON VICTAULIC VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104	REVIEW/ANALYZE RETURNED INITIAL NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104	REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S TRENCHING VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104	REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON INSULPRO PROJECTS VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.05	6.00

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				CARRIER REQUEST)	Hours 0.05	6.00
	JBV	L320	A104	REVIEW/ANALYZE RETURNED SECOND NRS\CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
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	DMC	L120	A109	APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (ARCHITECT) RE: [REDACTED] (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A109	APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A104	REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT (MICHELLE ROBBINS) [REDACTED]		

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				Hours	
[REDACTED]					
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.20	35.00
04/13/2016	JBV	L320	A104	REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT (MICHELLE ROBBINS) [REDACTED]	
[REDACTED]					
[REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.10	12.00
	JBV	L320	A103	DRAFT/REVISE NRS CHAPTER 40 CORRESPONDENCE TO FORD CONTRACTING, RE: PROVIDING PLAINTIFF'S DEFECT ALLEGATION INFORMATION AND DOCUMENTATION PROVIDED TO CLIENTS, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
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					Hours	
				CONTRACTING AS SUBCONTRACTOR HOLDING A RELEVANT SCOPE OF WORK TO DEFECT ALLEGATIONS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/14/2016	PCB	L110	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR GENERAL CONTRACTOR RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/22/2016	PCB	L120	A101	PLAN AND PREPARE FOR NEXT STEPS OF DEFENSE [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75
	JBV	L120	A104	REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE BUILDING ENVELOPE, RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104	REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE, INC., RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104	REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC., RE: INABILITY TO SERVE CHAPTER 40		

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				Hours	
			CORRESPONDENCE FROM PLAINTIFF'S COUNSEL, IN PREPARATION FOR DETERMINING NEXT LOCATION TO ATTEMPT SERVICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A103	DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: VERIFYING THOSE THAT HAVE BEEN SERVED AND THOSE THAT STILL NEED TO ATTEMPT SERVICE AT ALTERNATE LOCATION, PURSUANT TO NRCP 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104	REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE: [REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED]		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A103	DRAFT/REVISE OCIP COVERAGE INFORMATION [REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED]		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/25/2016	DMC	L120	A104 REVIEW/ANALYZE CORESSPONDENCE FROM ATTORNEY ROBERT SCHUMACHER RE: RETENTION TO REPRESENT VICTUALIC (MANUFACTURER PLACED ON CHAPTER 40 NOTICE BY CLIENT) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
RAB	L320	A104	REVIEW/ANALYZE CORRESPONDENCE FROM PLAINTIFF'S COUNSEL, RE: CHAPTER 40 PRELIMINARY LIST OF CONSTRUCTIONAL		

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				Hours	
DEFECTS AND DESCRIPTION OF EACH DEFECT (RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER FIRE BLOCKING, MECHANICAL ROOM PIPING, AND SEWER PROBLEMS IN PREPARATION FOR DRAFTING DEFECT LIST SUMMARY. (APPROXIMATELY 52 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.35	42.00
RAB	L320	A103	DRAFT/REVISE (BEGIN) DEFECT LIST SUMMARY AND COST OF REPAIR SUMMARY, RE: [REDACTED]		
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.30	36.00
04/29/2016	RAB	L110	A104 REVIEW/ANALYZE US BANKRUPTCY COURT DOCUMENTS, RE: BANKRUPTCY PETITION AND WHO OUR CLIENT DEBTOR PANORAMA TOWER II, LLC IS REPRESENTED BY IN PREPARATION FOR CORRESPONDING WITH COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
RAB	L110	A103	DRAFT/REVISE EMAIL TO JACOB HOUMAND AND VICTORIA NELSON, COUNSEL FOR OUR CLIENT'S IN BANKRUPTCY COURT, RE: STATUS OF THE BANKRUPTCY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
DMC	L120	A103	DRAFT/REVISE CORRESPONDENCE TO ENDURANCE SPECIALTY INSURANCE COMPANY (CLIENTS' EXCESS CARRIER) RE: [REDACTED]		
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.45	78.75
DMC	L120	A103	DRAFT/REVISE CORRESPONDENCE TO ED SONG AND SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: DEMAND FOR INFORMATION AND DOCUMENTS RELATING TO ALLEGED CHAPTER 40 DEFECTS AS		

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05/02/2016	DMC	L120	A107	REQUIRED BY STATUTE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
				COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR TEXAS WALL SYSTEMS NOW KNOWN AS OLDCASTLE BUILDINGENVELOPE) RE: [REDACTED]		
	DMC	L120	A104	REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT RE: [REDACTED]	0.15	26.25
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
	DMC	L120	A104	REVIEW/ANALYZE CLIENTS' OCIP MANUAL [REDACTED]	0.05	8.75
				(38 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
DMC	L120	A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT MJ DEAN IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00	
			REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT HALLIER PROPERTIES IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75	
DMC	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]	0.25	43.75	
			(TIME SPLIT			

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			Hours	
		WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104 REVIEW/ANALYZE BANKRUPTCY PETITION FOR CLIENT/INSURED PANORAMA TOWERS II, LLC TO DETERMINE POTENTIAL IMPACT ON CLAIMS AND IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (6 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
DMC	L120	A104 REVIEW/ANALYZE PRIOR SETTLEMENT AGREEMENT AND RELEASE FOR SETTLEMENT OF PRIOR LITIGATION FOR CONSTRUCTION DEFECT CLAIMS, INCLUDING ATTACHED FINDINGS OF FACT AND COURT ORDER BARRING CERTAIN CLAIMS INVOLVING SEPARATE INTEREST PROPERTY AT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS ASSOCIATION	0.10	17.50
		[REDACTED] PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
DMC	L120	A103 DRAFT/REVISE (BEGIN) INITIAL REPORT TO CARRIERS RE: BEGIN CLAIM SUMMARY:		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	78.75
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]		

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				Hours	
DMC	L120	A103	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]	0.35	61.25
DMC	L120	A103	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]	0.30	52.50
RAB	L110	A104	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE LITIGATION SERVICES DOCUMENTS, RE: [REDACTED]	0.25	43.75
RAB	L110	A103	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL TO LITIGATION SERVICES, RE: [REDACTED]	0.10	12.00
RAB	L110	A104	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE EMAIL FROM LITIGATION SERVICES, RE: [REDACTED]	0.05	6.00
RAB	L110	A103	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE EMAIL TO LITIGATION SERVICES, RE: [REDACTED]	0.05	6.00
RAB	L110	A104	[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS FROM LITIGATION SERVICES, RE: [REDACTED]	0.05	6.00

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				Hours	
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.05	6.00
05/03/2016	RAB	L110	A108	COMMUNICATE (OTHER EXTERNAL) WITH BANKRUPTCY ATTORNEY JOSHUA HOUMAND, RE: FOLLOW-UP TO EMAIL RELATING TO THE STATUS OF OUR CLIENT'S BANKRUPTCY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10 12.00
05/13/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JACOB HOUMAND (BANKRUPTCY COUNSEL FOR PANORAMA TOWERS II, LLC) RE: CONSTRUCTION DEFECT ACTION AND POTENTIAL IMPACT OF BANKRUPTCY ON CLAIMS AGAINST CLIENT AND POSSIBLE DECLARATORY RELIEF ACTION AGAINST CLAIMANT AT THE CONCLUSION OF THE PRE-LITIGATION PROCESS IN PREPARATION FOR INITIAL PLANNING CONFERENCE WITH CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10 17.50
	PCB	L120	A104	REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25 43.75
05/16/2016	PCB	L250	A104	REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45 78.75
05/20/2016	RAB	L110	A104	REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4525 DEAN MARTIN DRIVE [REDACTED]	

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				Hours	
[REDACTED]					
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
RAB	L110	A104	REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4575 DEAN MARTIN DRIVE [REDACTED]		
[REDACTED]					
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	42.00
05/21/2016	DMC	L120	A103 DRAFT/REVISE (BEGIN) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: NOTICE OF CLIENT BANKRUPTCY AND AUTOMATIC STAY OF CLAIMS, OBJECTION TO NOTICE INCLUDING DEFICIENCY OF NOTICE AND FAILURE TO MEET NEW STATUTORY REQUIREMENTS, ANALYSIS OF APPLICATION OF STATUTE OF REPOSE TIME BARRING ALL OF THE ASSOCIATION'S CLAIMS (3 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	113.75
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: CLIENTS' DETAILED RESPONSE TO EACH OF THE ALLEGED DEFECTS INCLUDING THE BASIS FOR DISCLAIMING ANY LIABILITY (5 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.80	140.00
05/24/2016	PCB	L250	A103 DRAFT/REVISE (CONTINUE) RESPONSE TO PLAINTIFF'S CHAPTER 40 NOTICE RE: ADDITIONAL DISCUSSION OF THE APPLICATION OF AB 125 TO THIS CLAIM.		

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	Hours	
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
For Current Services Rendered	27.90	4,035.50
Total Non-billable Hours	0.60	

Recapitulation

Timekeeper	Title	Hours	Rate	Total
Peter C. Brown	PARTNER	6.95	\$175.00	\$1,216.25
Jennifer Vela	PARALEGAL	8.20	120.00	984.00
Lexi Kim	PARALEGAL	5.25	120.00	630.00
Darlene M. Cartier	ASSOCIATE	5.55	175.00	971.25
Rachel A. Bounds	PARALEGAL	1.95	120.00	234.00

Expenses

03/31/2016	L100	E101	REPRODUCTION COSTS FOR MARCH 2016 (1927 PAGES AT .08/PAGE)	77.08
04/30/2016	L100	E101	REPRODUCTION COSTS FOR APRIL 2016 (141 PAGES AT .08/PAGE)	5.64
05/31/2016	L100	E101	REPRODUCTION COSTS FOR MAY 2016 (1141 PAGES AT .08/PAGE)	45.64
			Total Expenses	128.36
			Total Current Work	4,163.86
			Previous Balance	\$7,899.73
			Balance Due	<u>\$12,063.59</u>

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
7,899.73	0.00	0.00	0.00	0.00	4,172.61

Task Code Recapitulation

		<u>Fees</u>	<u>Expenses</u>
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	128.36
L110	FACT INVESTIGATION/DEVELOPMENT	971.00	0.00
L120	ANALYSIS/STRATEGY	1099.75	0.00
L130	EXPERTS/CONSULTANTS	178.75	0.00
L190	OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	35.00	0.00
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	2,284.50	128.36
L240	DISPOSITIVE MOTIONS	61.25	0.00
L250	OTHER WRITTEN MOTIONS AND SUBMISSIONS	210.00	0.00

ESIS Dallas AGL Claims

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		<u>Fees</u>	<u>Expenses</u>
L200	PRE-TRIAL PLEADINGS AND MOTIONS	271.25	0.00
L320	DOCUMENT PRODUCTION	876.00	0.00
L330	DEPOSITIONS	0.00	0.00
L340	EXPERT DISCOVERY	157.50	0.00
L390	OTHER DISCOVERY	446.25	0.00
L300	DISCOVERY	1,479.75	0.00

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number
on all payments.

Final Statement Run Totals 03/01/2017

Statements Printed:	1
Hours:	27.95
Fees:	4,044.25
Expenses:	128.36

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

ESIS Dallas AGL Claims
P.O. Box 5127
Scranton, PA 18505
USA

Attn: Sherilyn Brydon

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Account No: 1287-5581V
Statement No: 6

Fees

					Hours	
06/15/2016	JBV	L320	A107	COMMUNICATE WITH COUNSEL FOR CULLIGAN WATER, RE: REQUEST FOR STATUS OF CASE AND WHEN INSPECTIONS WILL TAKE PLACE, IN PREPARATION FOR INFORMING COUNSEL SHOULD ANY NEW INFORMATION ARISE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CHAPTER 40 CLAIM AND REQUESTING STATUS OF PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/17/2016	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLING) RE: CHAPTER 40 CLAIM AND REQUESTING STATUS OF PRE-LITIGATION PROCESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/20/2016	DMC	L120	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING CHAPTER 40 CLAIM AND STATUS OF PRE-LITIGATION PROCESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/22/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE		

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					Hours	
STATUS PURSUANT TO HIS REQUEST, INCLUDING SELECTION OF MEDIATOR FOR CHAPTER 40 MEDIATION AND THE HOA'S ALLEGATION RELATING TO THE MECHANICAL PIPING BELIEVED TO BE WITHIN CULLIGAN'S SCOPE OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)					0.05	8.25
06/23/2016	DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE STATUS UPDATE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/29/2016	PCB	L120	A103	DRAFT/REVISE (FINALIZE) FIRST SUIT REPORT RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	111.00
	DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
	DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC	L120	A104	REVIEW/ANALYZE BRIEF RESEARCH RE: EDWARD SONG AND SCOTT WILLIAMS TO DETERMINE THEIR BACKGROUND AND EXPERIENCE IN PREPARATION FOR DRAFTING INITIAL REPORT TO CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75
	DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT		

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		TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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				Hours	
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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				Hours	
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/30/2016	PCB	L250	A104 REVIEW/ANALYZE LETTER FROM COUNSEL FOR HOA TO MEDIATOR DISCUSSING THE ISSUES THAT ARE THE SUBJECT OF THE NEW CHAPTER 40 NOTICE (IN PREPARATION FOR CONFERENCE CALL WITH THE MEDIATOR). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L160	A109 APPEAR FOR/ATTEND CONFERENCE CALL WITH MEDIATOR (BRUCE EDWARDS) AND COUNSEL FOR THE HOA RE: DISCUSSION OF THE PRE-LITIGATION ISSUES THAT NEED TO BE TAKEN CARE OF BEFORE THE CASE MOVES TO FORMAL LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	46.25
	DMC	L120	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BRUCE EDWARDS (MEDIATOR) AND SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO PRE-LITIGATION PROCESS, INCLUDING THE CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	41.25
	DMC	L120	A103 DRAFT/REVISE E-MAIL TO WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE RESPONSE E-MAIL FROM WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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			Hours	
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO J. ALBREGTS (COUNSEL FOR SUBCONTRACTOR FLIPPIN'S TRENCHING) RE: REQUESTING STATUS OF FLIPPIN'S TENDER TO ITS INSURANCE CARRIER, TO DETERMINE WHETHER ANY ACTION CORRESPONDENCE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: PRIOR COMMUNICATIONS WITH SILVER STAR PLUMBING REGARDING CLAIMANT'S IMPROPER CHAPTER 40 NOTICE AND THAT SILVER STAR NEVER PERFORMED WORK ON THE PANORAMA TOWERS PROJECT, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO BERNADETTE TIONGSON (COUNSEL FOR SUBCONTRACTOR INSULPRO) RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: PRIOR COMMUNICATIONS WITH SUBCONTRACTOR SOUTHERN NEVADA PAVING INCLUDING CONTRACT WITH MJ DEAN (17 PAGES), CERTIFICATE OF ENROLLMENT IN OCIP (1 PAGE) AND SOUTHERN NEVADA PAVING'S DEMAND FOR CLAIMANT TO WITHDRAW ITS CHAPTER 40 NOTICE, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15 24.75
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: SUBCONTRACTORS CLAIMANT PLACED ON NOTICE OF THE CLAIM AND REQUEST FOR	

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				Hours	
			INFORMATION WE HAVE RELATING TO SAME, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L110	A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR HOA TO COUNSEL FOR SNP, REVIEW FILE MATERIALS, AND SEND EMAIL TO COUNSEL FOR SNP REGARDING THE NEW CHAPTER 40 CLAIM. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L120	A101 PLAN AND PREPARE FOR UPCOMING MEDIATION AS WELL AS ANTICIPATED DECLARATORY RELIEF ACTION (IF APPROVED BY CARRIER) FOLLOWING CONFERENCE CALL WITH PLAINTIFF'S COUNSEL AND THE MEDIATOR RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	55.50
07/01/2016	PCB	L190	A103 DRAFT/REVISE (FINALIZE) NOTICE OF CLAIM/TENDER OF DEFENSE TO ENDURANCE RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L190	A104 REVIEW/ANALYZE EMAIL FROM COUNSEL FOR THE HOA TO COUNSEL FOR SOUTHERN NEVADA PAVING, IDENTIFY ISSUES THAT ARE PROBABLY INCORRECT, AND SEND SEPARATE EMAIL TO COUNSEL FOR SNP DISCUSSING SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25
	PCB	L110	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR SOUTHERN NEVADA PAVING RE: CONTINUED DISCUSSION OF THE NOTICE HIS CLIENT RECEIVED FROM PLAINTIFF. (TIME SPLIT WITH OTHER CLAIM		

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				NO./FILE PER CARRIER REQUEST)	Hours 0.15	27.75
07/14/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: CASE STATUS UPDATE AND LITIGATION STRATEGY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L190	A108	COMMUNICATE (OTHER EXTERNAL) WITH VICKI KUNZ (BOMBARD) RE: DISCUSSION OF OVERALL CASE STATUS, ISSUES RELATED TO THE CHAPTER 40 NOTICE BOMBARD RECEIVED FROM PLAINTIFF, POTENTIAL RESPONSE TO SAME, [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	37.00
07/15/2016	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S CHAPTER 40 NOTICES TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION, (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICES, IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S COMPLAINT AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S AMENDED COMPLAINT AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A102	RESEARCH DOCTRINES OF ISSUE	0.05	8.25

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			Hours	
		PRECLUSION AND CLAIM PRECLUSION RE: CURRENT CASE LAW AND LEGAL AUTHORITY IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.70	115.50
DMC	L210	A103 DRAFT/REVISE (BEGIN) COMPLAINT FOR DECLARATORY RELIEF RE: PARTIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: JURISDICTION AND VENUE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) GENERAL ALLEGATIONS - APPLICABILITY OF AB 125. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.55	90.75
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) GENERAL ALLEGATIONS - CLAIMS RELATE TO OR ARISE OUT OF PRIOR SETTLED LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.70	115.50
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FIRST CLAIM FOR RELIEF - DECLARATORY RELIEF REGARDING APPLICATION OF AB 125. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: SECOND CLAIM FOR RELIEF - CLAIM PRECLUSION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	107.25
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: PRAYER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75
DMC	L210	A104 REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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				Hours		
	DMC	L210	A103	DRAFT/REVISE RESPONSE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) WITH COPY TO MICHAEL DEAN (CLIENT MJ DEAN) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
07/18/2016	PCB	L210	A104	REVIEW/ANALYZE NEW CD STATUTE AND CLIENTS' RESPONSE TO THE CHAPTER 40 NOTICE [REDACTED] [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
07/19/2016	RAB	L320	A104	REVIEW/ANALYZE DISMISSAL AND EARLY ENTRY ORDER RELATING TO OUR CLIENT IN ANOTHER CASE, RE: IDENTIFYING AND OBTAINING PLEADINGS IN THE PRIOR LITIGATION IN SUPPORT OF CLIENT'S COMPLAINT FOR DECLARATORY RELIEF AS PER REQUEST FROM ATTORNEY FOR REVIEW. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	14.25
08/02/2016	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: SUPPLEMENT GENERAL ALLEGATIONS REGARDING PLAINTIFF'S FAILURE TO PROPERLY IDENTIFY THE ALLEGED DAMAGES AND LOCATION OF DEFECTS ALLEGED IN ITS CHAPTER 40 NOTICE AND OUR REQUESTS TO THE ASSOCIATION REGARDING ITS PRIOR REPAIRS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: THIRD CLAIM FOR RELIEF - FAILURE TO COMPLY WITH NRS 40. 600 ET SEQ. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FOURTH CLAIM FOR RELIEF - SUPPRESSION OF EVIDENCE/SPOILIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		

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				REQUEST)	Hours 0.15	24.75
08/03/2016	DMC	L120	A104	REVIEW/ANALYZE COMMUNICATION FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO TRACY JIN AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	REVIEW/ANALYZE RESPONSE E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/05/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH SCOTT WILLIAMS (CLAIMANT'S		

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					Hours	
08/09/2016	DMC	L160	A104	COUNSEL) RE: CLAIMANT'S DEMAND FOR CHAPTER 40 MEDIATION AND PROPOSED STRATEGIES RELATING TO SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
				REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO BRUCE EDWARDS (MEDIATOR) RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/10/2016	DMC	L120	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH TOM LYNN (COUNSEL FOR VICTUALIC) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/11/2016	DMC	L210	A103	DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION RE: GENERAL ALLEGATIONS AND ADDITIONAL FACTUAL SUPPORT FOR CAUSES OF ACTION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM DAVID		

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					Hours	
				CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: MEDIATOR'S PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: CASE STATUS, INCLUDING MANDATORY CHAPTER 40 MEDIATION AND CLAIMS AGAINST HIS CLIENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
					0.10	16.50
08/12/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES		

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				Hours	
			RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: INSPECTIONS OF THE ALLEGED DEFECTS AND CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: OUR CLIENT'S INSPECTIONS OF THE ALLEGED DEFECTS AND NO ANTICIPATED ADDITIONAL INSPECTIONS UNTIL AFTER THE CASE PROCEEDS TO LITIGATION AND REGARDING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: REQUEST FOR DEFECT LIST AND COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: PLAINTIFF HAS NOT ISSUED A DEFECT LIST OR A COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/18/2016	PCB	L190	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR CARRIER FOR VICTUALIC RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
08/19/2016	PCB	L190	A104 REVIEW/ANALYZE LETTER FROM COUNSEL FOR VICTUALIC, REVIEW THE ORIGINAL SETTLEMENT AGREEMENT, AND PREPARE EMAIL TO COUNSEL EXPLAINING WHY THE SETTLEMENT AGREEMENT CANNOT BE DISCLOSED DUE TO A CONFIDENTIALITY CLAUSE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25

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				Hours		
08/23/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/24/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) TO DAVID CASTILLO OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL R E: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO TO SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO ROBERT SCHUMACHER AND THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
				For Current Services Rendered	15.30	2,549.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Peter C. Brown	PARTNER	2.10	\$185.00	\$388.50
Jennifer Vela	PARALEGAL	0.10	95.00	9.50
Darlene M. Cartier	ASSOCIATE	12.95	165.00	2,136.75

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<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Rachel A. Bounds	PARALEGAL	0.15	95.00	14.25

Expenses

06/01/2016	L100	E123	OTHER PROFESSIONALS (5102) EMP CONSULTANTS, INC. (CONSULTATION SERVICES) (INVOICE NO.: 30054)	60.00
06/30/2016	L100	E101	REPRODUCTION COSTS FOR JUNE 2016 (46 PAGES AT .08/PAGE)	1.84
07/31/2016	L100	E101	REPRODUCTION COSTS FOR JULY 2016 (132 PAGES AT .08/PAGE)	5.28
08/01/2016	L100	E123	OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (CONSULTING SERVICES) (INVOICE NO.: 1119903)	457.50
08/31/2016	L100	E101	REPRODUCTION COSTS FOR AUGUST 2016 (136 PAGES AT .08/PAGE)	5.44
			Total Expenses	530.06
			Total Current Work	3,079.06
			Previous Balance	\$12,072.34
			Balance Due	<u>\$15,151.40</u>

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
10,978.79	0.00	0.00	0.00	0.00	4,172.61

Task Code Recapitulation

	<u>Fees</u>	<u>Expenses</u>
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	530.06
L110 FACT INVESTIGATION/DEVELOPMENT	46.25	0.00
L120 ANALYSIS/STRATEGY	1272.00	0.00
L160 SETTLEMENT/NON-BINDING ADR	211.25	0.00
L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	92.50	0.00
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	1,622.00	530.06
L210 PLEADINGS	884.75	0.00
L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS	18.50	0.00
L200 PRE-TRIAL PLEADINGS AND MOTIONS	903.25	0.00
L320 DOCUMENT PRODUCTION	23.75	0.00
L300 DISCOVERY	23.75	0.00

ESIS Dallas AGL Claims

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March 02, 2017
Account No: 1287-5581V
Statement No: 6

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number
on all payments.

Final Statement Run Totals 03/02/2017

Statements Printed:	1
Hours:	15.30
Fees:	2,549.00
Expenses:	530.06

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

CHUBB INSURANCE
10 Exchange Place
9th floor
Jersey City NJ 07302

Attn: Jeff Ganzer

Panorama Tower I
48062208278589
PANORAMA TOWER I

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March 01, 2017
Account No: 1287-5511V
Statement No: 7

				<u>Fees</u>	Hours	
03/21/2016	PCB	L120	A108	COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	PCB	L340	A108	COMMUNICATE (OTHER EXTERNAL) WITH PERSONAL COUNSEL FOR M.J. DEAN AND PERSONAL COUNSEL FOR THE DEVELOPER (2 CALLS) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	PCB	L340	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: REQUEST FOR ACCESS TO SITE TO PERFORM EXPERT INVESTIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
03/22/2016	PCB	L110	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH SCOTT WILLIAMS (COUNSEL FOR HOA) RE: DISCUSSION OF THE PROBLEMS ASSOCIATED WITH THE WINDOWS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER		

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	PCB	L340	A101	CARRIER REQUEST) PLAN AND PREPARE FOR UPCOMING INSPECTION OF THE NEW ISSUES, ESPECIALLY HOW BEST TO DEAL WITH THE NEW WINDOW CLAIM GIVEN PLAINTIFF'S COUNSEL'S REPRESENTATION THAT ALL THE WINDOWS NEED TO BE REPLACED. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
					0.25	43.75
03/23/2016	PCB	L340	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE SITE INSPECTION PARAMETERS AND THE BANKRUPTCY OF ONE OF THE DEVELOPER ENTITIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A108	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE SITE INSPECTION PARAMETERS AND THE BANKRUPTCY OF ONE OF THE DEVELOPER ENTITIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75
	LK	L320	A104	REVIEW/ANALYZE PLAINTIFF'S THIRTY SECOND THROUGH THIRTY FIFTH PRODUCTION OF DOCUMENTS- PLAINTIFF'S EXPERT JOB FILE DOCUMENTS AND MATERIALS, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS IN ORDER TO IDENTIFY WINDOW MANUFACTURER FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
	LK	L320	A104	REVIEW/ANALYZE PLAINTIFF'S FORTY-SECOND PRODUCTION OF DOCUMENTS- PANORAMA TOWERS IN-HOUSE WORK ORDERS, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS IN ORDER TO IDENTIFY WINDOW MANUFACTURER FOR SUBJECT PROPERTIES, IN PREPARATION FOR		

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		SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
LK	L320	A104 REVIEW/ANALYZE PLAINTIFF'S FORTY-FIFTH THROUGH FORTY SIXTH PRODUCTION OF DOCUMENTS- COMPLAINT & REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	36.00
LK	L320	A104 REVIEW/ANALYZE PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS- SIERRA GLASS PLANS, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS IN ORDER TO IDENTIFY WINDOW MANUFACTURER FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
LK	L320	A104 REVIEW/ANALYZE PLAINTIFF'S FIFTY SECOND THROUGH FIFTY FOURTH PRODUCTION OF DOCUMENTS- PANORAMA TOWERS MAINTENANCE SCHEDULES AND WORK ORDERS, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS IN ORDER TO IDENTIFY WINDOW MANUFACTURER FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	36.00
LK	L320	A104 REVIEW/ANALYZE MJ DEAN'S FIRST PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIRST BATCH, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS IN ORDER TO IDENTIFY WINDOW MANUFACTURER FOR SUBJECT		

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					Hours	
				PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	42.00
	LK	L320	A104	REVIEW/ANALYZE MJ DEAN'S SECOND PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS SECOND BATCH, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATION SUBCONTRACTOR IN ORDER TO IDENTIFY WINDOW MANUFACTURER AND INSULATOR FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER AND INSULATOR FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
03/24/2016	LK	L320	A104	REVIEW/ANALYZE MJ DEAN'S THIRD PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS THIRD BATCH, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATION SUBCONTRACTOR IN ORDER TO IDENTIFY WINDOW MANUFACTURER AND INSULATOR FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER AND INSULATOR FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	54.00
	LK	L320	A104	REVIEW/ANALYZE MJ DEAN'S FOURTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FOURTH BATCH, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATION SUBCONTRACTOR IN ORDER TO IDENTIFY WINDOW MANUFACTURER AND INSULATOR FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER		

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LK	L320	A104	0.35	42.00
40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER AND INSULATOR FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE MJ DEAN'S FIFTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIFTH BATCH, RE: TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATION SUBCONTRACTOR IN ORDER TO IDENTIFY WINDOW MANUFACTURER AND INSULATOR FOR SUBJECT PROPERTIES, IN PREPARATION FOR SERVING NRS CHAPTER 40 CORRESPONDENCE TO PROJECT WINDOW MANUFACTURER AND INSULATOR FOR CONSTRUCTION DEFECTS ALLEGED BY PLAINTIFFS, PURSUANT TO SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)			0.45	54.00
LK	L320	A104	0.45	54.00
REVIEW/ANALYZE MJ DEAN'S SIXTH PRODUCTION OF DOCUMENTS- SIXTH JOB FILE BATCH, RE: ANALYSIS OF VARIOUS SUBCONTRACTOR CONTRACTS AND JOB FILE DOCUMENTS IN ORDER TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATIONS TO IDENTIFY WINDOW MANUFACTURER AND INSULATION CONTRACTOR, IN PREPARATION FOR SERVING OF NRS CHAPTER 40 CORRESPONDENCE TO SUBCONTRACTOR PURSUANT TO SUPERVISING ATTORNEY'S INSTRUCTIONS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)			0.40	48.00
LK	L320	A104	0.40	48.00
REVIEW/ANALYZE MJ DEAN'S SEVENTH PRODUCTION OF DOCUMENTS- SEVENTH JOB FILE BATCH, RE: ANALYSIS OF VARIOUS SUBCONTRACTOR CONTRACTS AND JOBFIL DOCUMENTS IN ORDER TO LOCATE ANY AND ALL INFORMATION PERTAINING TO WINDOWS AND INSULATIONS TO IDENTIFY WINDOW MANUFACTURER AND INSULATION CONTRACTOR, IN PREPARATION FOR SERVING OF NRS CHAPTER 40 CORRESPONDENCE TO SUBCONTRACTOR PURSUANT TO SUPERVISING ATTORNEY'S INSTRUCTIONS. (TIME SPLIT WITH OTHER				

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				Hours	
LK	L320	A104	CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE AND OBTAIN INFORMATION, RE: OLDCASTLE, INC. AND OLDCASTLE BUILDING ENVELOPE, IN PREPARATION FOR NRS CHAPTER 40 CORRESPONDENCE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	54.00
PCB	L390	A104	REVIEW/ANALYZE FILE MATERIALS FROM THE PROJECT AND THE CHAPTER 40 NOTICE IN PREPARATION FOR ATTENDANCE AT SITE INSPECTION WITH EXPERTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	36.00
PCB	L390	A109	APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION WITH CLIENTS' EXPERTS (NO TRAVEL TIME INCLUDED IN THIS ENTRY). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	52.50
PCB	L390	A109	APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION (SEPARATE NON-BILLABLE TRAVEL TIME). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	2.15	376.25
PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	n/c
JBV	L130	A108	COMMUNICATE WITH MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
JBV	L110	A108	COMMUNICATE WITH LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR PANORAMA TOWERS, IN PREPARATION FOR DETERMINING SPECIFIC SUBCONTRACTORS WHO PERFORMED WORK AT PROJECT RELEVANT TO THE DEFECT ALLEGATIONS LISTED IN PLAINTIFF'S NRS CHAPTER 40 CORRESPONDENCE SERVED ON CLIENTS.	0.10	12.00

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JBV	L110	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
		A103	REVIEW/ANALYZE EMAIL	6.00
			CORRESPONDENCE FROM LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR PANORAMA TOWERS, IN PREPARATION FOR DETERMINING SPECIFIC SUBCONTRACTORS WHO PERFORMED WORK AT PROJECT RELEVANT TO THE DEFECT ALLEGATIONS LISTED IN PLAINTIFF'S NRS CHAPTER 40	
			CORRESPONDENCE SERVED ON CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
JBV	L110	A103	DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION SERVICES, RE: REQUEST FOR UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES DURING PRIOR CONSTRUCTION DEFECT LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
		A104	REVIEW/ANALYZE ADDITIONAL EMAIL CORRESPONDENCE FROM LITIGATION SERVICES, RE: UPDATED LIST OF ALL DOCUMENTATION DISCLOSED FOR PRIOR CONSTRUCTION DEFECT LITIGATION, IN PREPARATION FOR DETERMINING IF MJ DEAN CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION FOR EASE OF REFERENCE TO SUBCONTRACTOR SCOPES OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
			REVIEW/ANALYZE UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES FROM PRIOR CONSTRUCTION DEFECT LITIGATION, RE: DETERMINING IF MJ DEAN CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION, IN PREPARATION FOR FOR EASE OF REFERENCE TO SUBCONTRACTOR SCOPES OF WORK AND SERVING SAID SUBCONTRACTORS WITH CHAPTER 40 CORRESPONDENCE PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM	6.00

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			Hours	
		DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRD PRODUCTION OF DOCUMENTS (P0001545-P0001612), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FOURTH PRODUCTION OF DOCUMENTS (P0001613-P0002486), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTH PRODUCTION OF DOCUMENTS (P0002487-P0002498), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW		

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		MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SIXTH PRODUCTION OF DOCUMENTS (P0002499), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SEVENTH PRODUCTION OF DOCUMENTS (P0002500-P2527), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S EIGHTH PRODUCTION OF DOCUMENTS (P0002528-P003351), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW	0.05	6.00

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		DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S NINTH PRODUCTION OF DOCUMENTS (P0003352-P0007044), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TENTH PRODUCTION OF DOCUMENTS (P0007045-P0008427), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S ELEVENTH PRODUCTION OF DOCUMENTS (P0008428-P0010290), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH		

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			OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
JBV	L110	A104	REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWELFTH PRODUCTION OF DOCUMENTS (P0010291-P0010602), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104	REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRTEENTH PRODUCTION OF DOCUMENTS (P0010603-P0010891), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104	REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FOURTEENTH PRODUCTION OF DOCUMENTS (P0010892-P0011105), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104	REVIEW/ANALYZE DOCUMENTS DISCLOSED		

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		<p>WITHIN PLAINTIFF'S FIFTEENTH PRODUCTION OF DOCUMENTS (P0011106-P0011431), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)</p>	0.10	12.00
JBV	L110	A104		
		<p>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SIXTEENTH PRODUCTION OF DOCUMENTS (P0011432-P0013410), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)</p>	0.15	18.00
JBV	L110	A104		
		<p>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SEVENTEENTH PRODUCTION OF DOCUMENTS (P0013411-P0013574), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)</p>	0.05	6.00
JBV	L110	A104		
		<p>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S EIGHTEENTH PRODUCTION OF DOCUMENTS (P0013575-P13684), RE: DETERMINING IF ANY</p>		

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		INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S NINETEENTH PRODUCTION OF DOCUMENTS (P0013685-P0015665), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTIETH PRODUCTION OF DOCUMENTS (P0015666-P0015963), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-FIRST PRODUCTION OF DOCUMENTS (P0015964-P16520), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN		

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			Hours	
		PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-SECOND PRODUCTION OF DOCUMENTS (P0016521-P0016656), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-THIRD PRODUCTION OF DOCUMENTS (P0016657-P0016743), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-FOURTH PRODUCTION OF DOCUMENTS (P0016744-P0016862), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW		


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		DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-FIFTH PRODUCTION OF DOCUMENTS (P0016863-P0018381), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-SIXTH PRODUCTION OF DOCUMENTS (P0018382-P0019204), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-SEVENTH PRODUCTION OF DOCUMENTS (P0019205-P0019212), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH		

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		OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-EIGHTH PRODUCTION OF DOCUMENTS (P0019213-P0019224), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWENTY-NINTH PRODUCTION OF DOCUMENTS (P0019225-P0020007), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRTIETH PRODUCTION OF DOCUMENTS (P0020008-P0020242), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED		

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WITHIN PLAINTIFF'S THIRTY-FIRST PRODUCTION OF DOCUMENTS (P0020243-P0021372), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.05	6.00	
03/25/2016	JBV	L110	A104 COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:  (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00	
	JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SEVENTH PRODUCTION OF DOCUMENTS (P0069102-69107), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00	
	JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SIXTH PRODUCTION OF DOCUMENTS (P0068453-69101), RE: DETERMINING IF ANY			

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		INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-FIFTH PRODUCTION OF DOCUMENTS (P0068437-68452), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-FOURTH PRODUCTION OF DOCUMENTS (P0067635-68436), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	24.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-THIRD PRODUCTION OF DOCUMENTS (P0067532-67634), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN		

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		PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SECOND PRODUCTION OF DOCUMENTS (P0061805-67531), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	42.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-FIRST PRODUCTION OF DOCUMENTS (P0061656-61804), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTIETH PRODUCTION OF DOCUMENTS (P0061534-61655), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW		

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		DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS (P0061330-61533), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FORTY-EIGHTH PRODUCTION OF DOCUMENTS (P0054588-61329), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	54.00
JBV	L110	A104 REVIEW/ANALYZE SIERRA GLASS PLANS AS DISCLOSED BY PLAINTIFF'S COUNSEL (P0061254-61329), RE: DETERMINING THE WINDOW MANUFACTURER INFORMATION, IN PREPARATION FOR SERVING SAID MANUFACTURER WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A108 COMMUNICATE WITH CLIENT'S POTENTIAL		

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			Hours	
		CORRESPONDENCE TO BOMBARD MECHANICAL, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE CORPORATE INFORMATION FOR INSULPRO PROJECTS, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103 DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO INSULPRO PROJECTS, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE CORPORATE INFORMATION FOR FLIPPIN'S TRENCHING, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103 DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO FLIPPIN'S TRENCHING, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104 REVIEW/ANALYZE CORPORATE INFORMATION FOR VICTAULIC, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103 DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO VICTAULIC, RE:	0.05	6.00

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			PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104	REVIEW/ANALYZE CORPORATE INFORMATION FOR SIERRA GLASS & MIRROR, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO SIERRA GLASS & MIRROR, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLDCASTLE, INC., RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A104	REVIEW/ANALYZE CORPORATE INFORMATION FOR CULLIGAN WATER (TWO ENTITIES), RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN WATER	0.05	6.00

					Hours	
				COMPANY OF NEVADA, INC. ALSO KNOWN AS CULLIGAN WATER COMPANY, LLC, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN PURE WATER ALSO KNOWN AS CULLIGAN WATER CONDITIONING OF LAS VEGAS, NEVADA, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L110	A103	DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO AQUAMATIC, RE: PROVIDING INFORMATION RELEVANT TO RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	PCB	L250	A104	REVIEW/ANALYZE FILE MATERIALS IN ORDER TO MAKE SURE ALL NECESSARY PARTIES HAVE BEEN PROVIDED WITH CHAPTER 40 NOTICE OF THE NEW ISSUES AND TO FINALIZE ALL THE ACTUAL CHAPTER 40 NOTICES TO REFLECT NECESSARY INFORMATION FROM THE FILE DOCUMENTS, INFORMATION FROM THE RECENT INSPECTION AND INFORMATION FROM ANALYSIS OF THE ALLEGED NEW DEFECTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	105.00
03/28/2016	PCB	L390	A103	DRAFT/REVISE LETTER TO COUNSEL FOR PLAINTIFF RE: DISCUSSION OF THE LACK OF NECESSARY INFORMATION IN THE NEW CHAPTER 40 NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	PCB	L240	A104	REVIEW/ANALYZE STATUTORY PROVISIONS IN CONJUNCTION WITH PLAINTIFF'S NEW CHAPTER 40 NOTICE [REDACTED]		

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[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)					0.35	61.25
03/29/2016	PCB	L340	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: ISSUES OVER THE WATER TESTING THAT IS BEING PERFORMED WITHOUT PROPER NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L340	A108	COMMUNICATE (OTHER EXTERNAL) WITH MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	PCB	L340	A104	REVIEW/ANALYZE EMAIL FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
03/30/2016	PCB	L190	A104	REVIEW/ANALYZE EMAIL FROM COUNSEL FOR CULLIGAN AND PROVIDE REQUESTED DOCUMENTS IN RESPONSE TO REQUEST FOR SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH JORGE RAMIREZ (COUNSEL FOR CULLIGAN) RE: INITIAL DISCUSSION OF THE CLAIMS PERTAINING TO CULLIGAN'S FERROUS PARTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	LK	L320	A103	DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE TO FLIPPINS TRENCHING. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
	LK	L320	A103	DRAFT/REVISE CORRESPONDENCE TO INSULPRO PROJECTS, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
	LK	L320	A103	DRAFT/REVISE CORRESPONDENCE TO OLD		

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		CASTLE, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
LK	L320	A103 DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
LK	L320	A103 DRAFT/REVISE CORRESPONDENCE TO SIERRA GLASS & MIRROR, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
LK	L320	A103 DRAFT/REVISE CORRESPONDENCE TO TEXAS WALL SYSTEMS, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
LK	L320	A103 DRAFT/REVISE CORRESPONDENCE TO VICTAULIC, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A104 REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC, RE: VERIFYING DEFECT ALLEGATIONS LISTED WITHIN AS WELL AS ATTACHED REPORTS ARE IDENTICAL TO THE NRS CHAPTER 40 CORRESPONDENCE SERVED ON CLIENT, MJ DEAN CONSTRUCTION, IN PREPARATION FOR SUBMITTING SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO EACH SUBCONTRACTOR/MANUFACTURER PROVIDING SEPARATE CORRESPONDENCE IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
JBV	L110	A103 DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO AQUAMATIC, RE: PROVIDING NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA	0.10	12.00

CHUBB INSURANCE

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				Hours	
			TOWERS I, LLC AND PANORAMA TOWERS II, LLC, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L110	A103 DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO BOMBARD MECHANICAL, RE: PROVIDING NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/01/2016	DMC	L120	A108 COMMUNICATE (OTHER EXTERNAL) WITH TOM DANK OF AQUAMATIC COVER SYSTEMS RE: OBJECTION TO CLIENT'S CHAPTER 40 NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A108 COMMUNICATE (OTHER EXTERNAL) (ADDITIONAL COMMUNICATION) WITH TOM DANK OF AQUAMATIC POOL SYSTEMS RE: CLIENT'S CHAPTER 40 NOTICE AND IMPROPER ENTITY FOR ALLEGED DEFECTS IDENTIFIED IN THE NOTICE AND OUR AGREEMENT TO WITHDRAW NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/06/2016	JBV	L110	A104 REVIEW/ANALYZE CORPORATE INFORMATION FOR ANY COMPANY RELEVANT TO AQUAMATIC AND VALVES, RE: ENSURING NRS CHAPTER 40 CORRESPONDENCE IS SENT TO PROPER MANUFACTURER ON BEHALF OF CLIENTS, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
	JBV	L320	A103 REVIEW/ANALYZE CORPORATE INFORMATION FOR ANY COMPANY RELEVANT TO AQUAMATIC AND VALVES, RE: ENSURING NRS CHAPTER 40 CORRESPONDENCE IS SENT TO PROPER MANUFACTURER ON BEHALF OF CLIENTS, PURSUANT TO NRS 40.646 RE: SERVING NRS CHAPTER 40 DEFECT ALLEGATIONS AS PROVIDED TO CLIENTS, PANORAMA		

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			TOWERS I AND II AS WELL AS MJ DEAN CONSTRUCTION, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104 REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN CONSTRUCTION, RE: VERIFYING THAT ALL ATTACHMENTS SUCH AS PLAINTIFF'S EXPERT REPORTS AND RELATED DOCUMENTS ARE INCLUDED, IN PREPARATION FOR PROVIDING CENTRO, INC. WITH CLIENT'S NRS CHAPTER 40 CORRESPONDENCE, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104 REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER DEVELOPMENT, RE: VERIFYING THAT ALL ATTACHMENTS SUCH AS PLAINTIFF'S EXPERT REPORTS AND RELATED DOCUMENTS ARE INCLUDED, IN PREPARATION FOR PROVIDING CENTRO, INC. WITH CLIENT'S NRS CHAPTER 40 CORRESPONDENCE, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/07/2016	PCB	L190	A104 REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC AND PREPARE EMAIL IN RESPONSE TO SAME ANSWERING QUESTIONS ABOUT THE PROJECT AND THE CHAPTER 40 NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON AQUAMATIC COVER SYSTEMS VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED		

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			Hours	
		FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON BOMBARD MECHANICAL VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN PURE WATER/CULLIGAN WATER CONDITIONING OF LAS VEGAS VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN WATER COMPANY OF NEVADA VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S TRENCHING VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON OLD CASTLE BUILDING ENVELOPE VIA CERTIFIED	0.05	6.00

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			Hours	
		MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON VICTAULIC VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RETURNED INITIAL NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S TRENCHING VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104 REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON INSULPRO PROJECTS VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME	0.05	6.00

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				Hours	
			SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104 REVIEW/ANALYZE RETURNED SECOND NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID CORRESPONDENCE WAS SERVED IN A PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A103 DRAFT/REVISE UPDATE INFORMATION INTO CLIENTS' SUMMARY OF NRS CHAPTER 40 CORRESPONDENCE (11 TOTAL), RE: SERVICE OF SAID DOCUMENTS TO SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	18.00
04/12/2016	DMC	L120	A103 DRAFT/REVISE CORRESPONDENCE TO AQUAMATIC RE: WITHDRAWAL OF CLIENTS' CHAPTER 40 NOTICES, WITHOUT PREJUDICE, RESERVATION OF RIGHTS TO REISSUE NOTICES AT A LATER DATE AND ANY SUCH NOTICES WILL RELATE BACK TO THE DATE OF THE ORIGINAL NOTICES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
	DMC	L120	A109 APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (ARCHITECT) RE: [REDACTED] [REDACTED] [REDACTED] (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A109 APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	PCB	L130	A104 REVIEW/ANALYZE DOCUMENTS PROVIDED		

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				Hours	
BY EXPERT (MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS [REDACTED]					
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.20	35.00
04/13/2016	JBV	L320	A104	REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT (MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS [REDACTED]	
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.10	12.00
	JBV	L320	A103	DRAFT/REVISE NRS CHAPTER 40 CORRESPONDENCE TO FORD CONTRACTING, RE: PROVIDING PLAINTIFF'S DEFECT ALLEGATION INFORMATION AND DOCUMENTATION PROVIDED TO CLIENTS, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
	JBV	L320	A104	REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER DEVELOPMENT/PANORAMA TOWERS I AND II, RE: VERIFYING ALL DOCUMENTATION SUCH AS EXPERT REPORTS REFLECTING DEFECT ALLEGATIONS ARE INCLUDED WITHIN, IN PREPARATION FOR PROVIDING FORD CONTRACTING AS SUBCONTRACTOR HOLDING A RELEVANT SCOPE OF WORK TO DEFECT ALLEGATIONS.(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
	JBV	L320	A104	REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN CONSTRUCTION, RE: VERIFYING ALL DOCUMENTATION SUCH AS EXPERT REPORTS REFLECTING DEFECT ALLEGATIONS ARE INCLUDED WITHIN, IN	

					Hours	
				PREPARATION FOR PROVIDING FORD CONTRACTING AS SUBCONTRACTOR HOLDING A RELEVANT SCOPE OF WORK TO DEFECT ALLEGATIONS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/14/2016	PCB	L110	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR GENERAL CONTRACTOR RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/22/2016	PCB	L120	A101	PLAN AND PREPARE FOR NEXT STEPS OF DEFENSE [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75
	JBV	L320	A104	REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE BUILDING ENVELOPE, RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104	REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE, INC., RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	JBV	L320	A104	REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC.,		

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					Hours	
				RE: INABILITY TO SERVE CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL, IN PREPARATION FOR DETERMINING NEXT LOCATION TO ATTEMPT SERVICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A103		DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: VERIFYING THOSE THAT HAVE BEEN SERVED AND THOSE THAT STILL NEED TO ATTEMPT SERVICE AT ALTERNATE LOCATION, PURSUANT TO NRCP 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A104		REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE: DETERMINING WHICH SUBCONTRACTORS WITHIN THE SCOPE OF ALLEGED DEFECTS MADE BY PLAINTIFF'S COUNSEL ARE COVERED BY INSURANCE, IN PREPARATION FOR INCORPORATING INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
JBV	L320	A103		DRAFT/REVISE OCIP COVERAGE INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: INCORPORATING SAID COVERAGE INFORMATION FOR ANY COVERED SUBCONTRACTORS OR MANUFACTURERS INTO SUMMARY, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
04/25/2016	DMC	L120	A104	REVIEW/ANALYZE CORESSPONDENCE FROM ATTORNEY ROBERT SCHUMACHER RE: RETENTION TO REPRESENT VICTUALIC (MANUFACTURER PLACED ON CHAPTER 40 NOTICE BY CLIENT) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	RAB	L320	A104	REVIEW/ANALYZE CORRESPONDENCE FROM PLAINTIFF'S COUNSEL. RE: CHAPTER		

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			40 PRELIMINARY LIST OF CONSTRUCTIONAL DEFECTS AND DESCRIPTION OF EACH DEFECT (RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER FIRE BLOCKING, MECHANICAL ROOM PIPING, AND SEWER PROBLEMS IN PREPARATION FOR DRAFTING DEFECT LIST SUMMARY. (APPROXIMATELY 52 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	42.00
	RAB	L320	A103 DRAFT/REVISE (BEGIN) DEFECT LIST SUMMARY AND COST OF REPAIR SUMMARY, RE: CHAPTER 40 PRELIMINARY LIST OF CONSTRUCTIONAL DEFECTS AND DESCRIPTION OF EACH DEFECT (RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER FIRE BLOCKING, MECHANICAL ROOM PIPING, AND SEWER PROBLEMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	36.00
04/29/2016	RAB	L110	A104 REVIEW/ANALYZE US BANKRUPTCY COURT DOCUMENTS, RE: BANKRUPTCY PETITION AND WHO OUR CLIENT DEBTOR PANORAMA TOWER II, LLC IS REPRESENTED BY IN PREPARATION FOR CORRESPONDING WITH COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
	RAB	L110	A103 DRAFT/REVISE EMAIL TO JACOB HOUMAND AND VICTORIA NELSON, COUNSEL FOR OUR CLIENT'S IN BANKRUPTCY COURT, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
	DMC	L120	A103 DRAFT/REVISE CORRESPONDENCE TO ENDURANCE SPECIALTY INSURANCE COMPANY (CLIENTS' EXCESS CARRIER) RE: [REDACTED]		
	DMC	L120	A103 DRAFT/REVISE CORRESPONDENCE TO ED SONG AND SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: DEMAND FOR INFORMATION AND DOCUMENTS RELATING	0.45	78.75

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				Hours	
05/02/2016	DMC	L120	A107	TO ALLEGED CHAPTER 40 DEFECTS AS REQUIRED BY STATUTE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15
			A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR TEXAS WALL SYSTEMS NOW KNOWN AS OLDCASTLE BUILDINGENVELOPE) RE: CLIENTS' CHAPTER 40 NOTICE, CASE BACKGROUND INCLUDING PRIOR LITIGATION AND HIS POSSIBLE INTEREST IN A UNITED DEFENSE STRATEGY. v	26.25
	DMC	L120	A104	REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT RE: OCCUPANCY DATES FOR EACH TOWER IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15
			A104	REVIEW/ANALYZE CLIENTS' OCIP MANUAL TO DETERMINE UNDERLYING COVERAGE, AND AND NAMED INSUREDS IN PREPARATION FOR DRAFTING FIRST SUIT REPORT TO CARRIER AND CLIENTS (38 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	26.25
	DMC	L120	A104	REVIEW/ANALYZE CLIENTS' OCIP MANUAL TO DETERMINE UNDERLYING COVERAGE, AND AND NAMED INSUREDS IN PREPARATION FOR DRAFTING FIRST SUIT REPORT TO CARRIER AND CLIENTS (38 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
			A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT MJ DEAN IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	8.75
	DMC	L120	A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT MJ DEAN IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20
			A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT HALLIER PROPERTIES IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	35.00
	DMC	L120	A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT HALLIER PROPERTIES IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25
			A104	REVIEW/ANALYZE CORRESPONDENCE FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: MJ DEAN'S TENDER OF DEFENSE TO ACE WESTCHESTER SPECIALTY GROUP RELATING TO NEW CHAPTER 40 NOTICE IN PREPARATION FOR INITIAL STATUS REPORT	43.75

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				Hours	
			TO CARRIER AND CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104	REVIEW/ANALYZE BANKRUPTCY PETITION FOR CLIENT/INSURED PANORAMA TOWERS II, LLC TO DETERMINE POTENTIAL IMPACT ON CLAIMS AND IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (6 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
DMC	L120	A104	REVIEW/ANALYZE PRIOR SETTLEMENT AGREEMENT AND RELEASE FOR SETTLEMENT OF PRIOR LITIGATION FOR CONSTRUCTION DEFECT CLAIMS, INCLUDING ATTACHED FINDINGS OF FACT AND COURT ORDER BARRING CERTAIN CLAIMS INVOLVING SEPARATE INTEREST PROPERTY AT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS ASSOCIATION TO ANALYZE POTENTIAL IMPACT ON CLAIMS AND IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS INCLUDING ATTACHED (21 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
DMC	L120	A103	DRAFT/REVISE (BEGIN) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	78.75
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]		

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			Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35
			DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]	61.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30
			DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED]	52.50
RAB	L110	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25
			REVIEW/ANALYZE LITIGATION SERVICES DOCUMENTS, RE: DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES IN PREPARATION FOR CORRESPONDING WITH LITIGATION SERVICES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	43.75
RAB	L110	A103	DRAFT/REVISE EMAIL TO LITIGATION SERVICES, RE: DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10
RAB	L110	A104	REVIEW/ANALYZE RESPONSE EMAIL FROM LITIGATION SERVICES, RE: DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES IN PREPARATION FOR RESPONSE EMAIL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
RAB	L110	A103	DRAFT/REVISE RESPONSE EMAIL TO LITIGATION SERVICES, RE: INFORMATION RELATING TO DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
RAB	L110	A104	REVIEW/ANALYZE DOCUMENTS FROM LITIGATION SERVICES, RE: DEPOSITORY	0.05

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				Hours	
			INDEX RELATING TO PRIOR PANORAMA TOWER CASES IN PREPARATION FOR ASSISTING THE ATTORNEY WITH THE DISCOVERY PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
05/03/2016	RAB	L110	A108 COMMUNICATE (OTHER EXTERNAL) WITH BANKRUPTCY ATTORNEY JOSHUA HOUMAND, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
05/13/2016	DMC	L120	A103 DRAFT/REVISE E-MAIL TO JACOB HOUMAND (BANKRUPTCY COUNSEL FOR PANORAMA TOWERS II, LLC) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	PCB	L120	A104 REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75
05/16/2016	PCB	L250	A104 REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	78.75
05/20/2016	RAB	L110	A104 REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO		

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			4525 DEAN MARTIN DRIVE IN ORDER TO ASSIST THE ATTORNEY WITH HER ANALYSIS AND CHAPTER 40 CORRESPONDENCES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
	RAB	L110	A104 REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4575 DEAN MARTIN DRIVE IN ORDER TO ASSIST THE ATTORNEY WITH HER ANALYSIS AND CHAPTER 40 CORRESPONDENCES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	42.00
05/21/2016	DMC	L120	A103 DRAFT/REVISE (BEGIN) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: NOTICE OF CLIENT BANKRUPTCY AND AUTOMATIC STAY OF CLAIMS, OBJECTION TO NOTICE INCLUDING DEFICIENCY OF NOTICE AND FAILURE TO MEET NEW STATUTORY REQUIREMENTS, ANALYSIS OF APPLICATION OF STATUTE OF REPOSE TIME BARRING ALL OF THE ASSOCIATION'S CLAIMS (3 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	113.75
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: CLIENTS' DETAILED RESPONSE TO EACH OF THE ALLEGED DEFECTS INCLUDING THE BASIS FOR DISCLAIMING ANY LIABILITY (5 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.80	140.00
	DMC	L330	A101 	0.05	8.75
05/24/2016	PCB	L250	A103 DRAFT/REVISE (CONTINUE) RESPONSE TO PLAINTIFF'S CHAPTER 40 NOTICE RE: ADDITIONAL DISCUSSION OF THE		

CHUBB INSURANCE

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Account No: 1287-5511V

Statement No: 7

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	Hours	
APPLICATION OF AB 125 TO THIS CLAIM. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
For Current Services Rendered	27.95	4,044.25
Total Non-billable Hours	0.60	

Recapitulation

Timekeeper	Title	Hours	Rate	Total
Peter C. Brown	PARTNER	6.95	\$175.00	\$1,216.25
Jennifer Vela	PARALEGAL	8.20	120.00	984.00
Lexi Kim	PARALEGAL	5.25	120.00	630.00
Darlene M. Cartier	ASSOCIATE	5.60	175.00	980.00
Rachel A. Bounds	PARALEGAL	1.95	120.00	234.00

Expenses

03/31/2016	L100	E101	REPRODUCTION COSTS FOR MARCH 2016 (1927 PAGES AT .08/PAGE)	77.08
04/30/2016	L100	E101	REPRODUCTION COSTS FOR APRIL 2016 (141 PAGES AT .08/PAGE)	5.64
05/31/2016	L100	E101	REPRODUCTION COSTS FOR MAY 2016 (1141 PAGES AT .08/PAGE)	45.64
			Total Expenses	128.36
			Total Current Work	4,172.61
			Previous Balance before Adjustments	\$25,820.20
03/06/2017			WRITE-OFF (RE-ENTER TIME SPLITTING IT BETWEEN 1287.551 AND 1287.558)	-21,690.55
			Previous Balance	\$4,129.65
			Balance Due	<u>\$8,302.26</u>

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
8,302.26	0.00	0.00	0.00	0.00	0.00

Task Code Recapitulation

		<u>Fees</u>	<u>Expenses</u>
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	128.36
L110	FACT INVESTIGATION/DEVELOPMENT	971.00	0.00
L120	ANALYSIS/STRATEGY	1093.75	0.00
L130	EXPERTS/CONSULTANTS	178.75	0.00

0237

AA2946

CHUBB INSURANCE

Panorama Tower I
48062208278589
PANORAMA TOWER I

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March 01, 2017
Account No: 1287-5511V
Statement No: 7

		<u>Fees</u>	<u>Expenses</u>
L190	OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	35.00	0.00
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	2,278.50	128.36
L240	DISPOSITIVE MOTIONS	61.25	0.00
L250	OTHER WRITTEN MOTIONS AND SUBMISSIONS	210.00	0.00
L200	PRE-TRIAL PLEADINGS AND MOTIONS	271.25	0.00
L320	DOCUMENT PRODUCTION	882.00	0.00
L330	DEPOSITIONS	8.75	0.00
L340	EXPERT DISCOVERY	157.50	0.00
L390	OTHER DISCOVERY	446.25	0.00
L300	DISCOVERY	1,494.50	0.00

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

Final Statement Run Totals 03/01/2017

Statements Printed:	1
Hours:	27.95
Fees:	4,044.25
Expenses:	128.36

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

ESIS Dallas AGL Claims
P.O. Box 5127
Scranton, PA 18505
USA

Attn: Sherilyn Brydon

Panorama Tower II
5143220827859X-A
PANORAMA TOWER II

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March 03, 2017
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Statement No: 7

Fees

					Hours	
09/02/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM CAIRO PERSON OF JAMS (MEDIATOR) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION, INCLUDING SUBMISSION OF BRIEFS, IN PREPARATION FOR STATUS REPORT TO CLIENT AND CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO ALL SUBCONTRACTOR COUNSEL RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF SETTLEMENT DEMAND FROM THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO MARTIN LITTLE (COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO JEFF GANZER (CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM	0.05	8.25

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				Hours	
CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE STATUS AND STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF SETTLEMENT DEMAND FROM THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.05	8.25
09/03/2016	PCB	L210	A103 DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF MOTION RE: ADDITIONAL ALLEGATIONS PERTAINING TO THE CHAPTER 40 PRE-LITIGATION PROCESS THAT WAS NOT FOLLOWED APPROPRIATELY BY THE HOA. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	37.00
09/04/2016	PCB	L120	A103 DRAFT/REVISE EMAIL TO JEFF GANZER (CHUBB) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25
09/06/2016	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM CAIRO PETERSON OF JAMS (MEDIATOR) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE ADDITIONAL E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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PANORAMA TOWER II

				Hours	
09/12/2016	DMC	L160	A103	DRAFT/REVISE E-MAIL TO MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE IN ANOTHER MATTER) RE: NO RESPONSE FROM OLD CASTLE TO CLIENTS' CHAPTER 40 NOTICE AND REQUEST THAT SHE PLACE OLD CASTLE'S INSURANCE CARRIER ON NOTICE OF THE CLAIM AS A PROFESSIONAL COURTESY AND CONTACT OLD CASTLE REGARDING SAME IN PREPARATION FOR UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
	DMC	L160	A108	COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE IN ANOTHER MATTER) RE: HER TENDER OF THIS CLAIM TO OLD CASTLE'S INSURANCE CARRIER, HER RETENTION TO REPRESENT OLD CASTLE IN THIS CASE AND REGARDING THE UPCOMING CHAPTER 40 MEDIATION IN PREPARATION FOR REPLY E-MAIL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15
	DMC	L160	A103	DRAFT/REVISE REPLY TO E-MAIL FROM MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE) WITH COPY TO ROBERT THOMPSON (COUNSEL FOR OLD CASTLE) RE: ADDITIONAL DISCUSSION INVOLVING STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM	0.05

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				NO./FILE PER CARRIER REQUEST)	Hours	
					0.05	8.25
	DMC	L160	A103	DRAFT/REVISE FORM CORRESPONDENCE TO ALL SUBCONTRACTORS BWBO PLACED ON NOTICE OF THE ASSOCIATION'S CHAPTER 40 CLAIM REGARDING THE UPCOMING MEDIATION IN PREPARATION (INDIVIDUAL LETTERS TO EACH SUBCONTRACTOR TO BE PREPARED BY THE SECRETARY). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
					0.15	24.75
09/13/2016	DMC	L160	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: INFORMATION HE REQUESTS REGARDING THE UPCOMING CHAPTER 40 MEDIATION INCLUDING WHETHER WE HAVE OBTAINED ANY DOCUMENTS OR INFORMATION REGARDING THE ASSOCIATION'S CLAIMS OR HIS CLIENT'S WORK IMPLICATED IN THE CLAIMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
					0.05	8.25
	DMC	L160	A108	COMMUNICATE (OTHER EXTERNAL) WITH ASHLEY ALLARD (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
					0.10	16.50
	DMC	L160	A103	DRAFT/REVISE (BEGIN) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]		
				[REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
					0.10	16.50
	DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]		
				[REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		
					0.15	24.75
	DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING		

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			Hours	
DMC	L160	A103	CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.15	24.75
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.65	107.25
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.30	49.50
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.55	90.75
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.15	24.75
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	
			0.70	115.50

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PANORAMA TOWER II

				Hours		
CHAPTER 40 MEDIATION RE: [REDACTED]						
[REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.20	33.00	
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25	
DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS FORTHCOMING DETERMINATION AS TO WHETHER CULLIGAN WILL BE PARTICIPATING IN THE UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25	
DMC	L160	A104	REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM EDEN WATERS OF MKA (CLIENT'S ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50	
09/14/2016	RAB	L320	A104	REVIEW/ANALYZE CERTIFICATE OF OCCUPANCIES, RE: PERMIT NUMBERS AND ADDRESS OF 2 BUILDING IN PREPARATION FOR CORRESPONDING WITH THE CLARK COUNTY BUILDING DEPARTMENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	RAB	L320	A108	COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: CERTIFICATES OF COMPLETION AND FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	DMC	L120	A104	REVIEW/ANALYZE REVIEW OCIP ENROLLMENT LIST AND OTHER NAMED		

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				Hours	
RESPONDENTS THE ASSOCIATION SERVED WITH CHAPTER 40 NOTICES TO DETERMINE WHICH RESPONDENTS ARE ENROLLED IN THE OCIP AND RELEASED FOR PRIOR CLAIMS AND THOSE THAT ARE NOT, IN PREPARATION FOR UPCOMING CHAPTER 40 MEDIATION AND TO ANALYZE POTENTIAL THIRD-PARTY ACTION AGAINST NON-ENROLLED SUBCONTRACTORS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.15	24.75
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
09/15/2016	RAB	L130	A108 COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT EMP CONSULTANTS, RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	RAB	L130	A108 COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	RAB	L130	A103 DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	DMC	L150	A103 DRAFT/REVISE PHASE I LITIGATION BUDGET PURSUANT TO REQUEST BY CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
	PCB	L120	A104 REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION [REDACTED] [REDACTED]		

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					Hours	
				[REDACTED]		
				[REDACTED] TIME SPLIT WITH FILE #1287.551 - "PANORAMA TOWER II").	0.20	37.00
09/16/2016	RAB	L140	A108	COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENTS RECORDS DEPARTMENT, RE: FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	RAB	L140	A103	DRAFT/REVISE MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	RAB	L140	A104	REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S EXPERT [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	RAB	L140	A104	REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT MADSEN, KNEPPERS & ASSOCIATES, INC., RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
	RAB	L140	A103	DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
09/19/2016	PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]		

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				Hours	
			(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.551).	0.10	18.50
PCB	L250	A103	DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF RE: [REDACTED]		
			(TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER II" - 1287.551).	0.40	74.00
PCB	L160	A101	PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]		
			(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551).	0.50	92.50
DMC	L160	A104	REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: STRATEGIES FOR UPCOMING CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED]		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L160	A103	DRAFT/REVISE SEPARATE CORRESPONDENCE TO INSULPRO PROJECTS, FLIPPINS TRENCHING, BOMBARD MECHANICAL, FORD CONTRACTING AND SIERRA GLASS RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION, IN PREPARATION FOR SERVICE TO PARTIES (5 LETTERS). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75

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				Hours	
	DMC	L160	A103	DRAFT/REVISE SEPARATE CORRESPONDENCE TO OLD CASTLE, CULLIGAN, VICTAULIC AND CENTRO RE: DEMAND FOR ATTENDANCE AT UPCOMING CHAPTER 40 MEDIATION, IN PREPARATION FOR SERVICE TO PARTIES (4 LETTERS). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15 24.75
	DMC	L160	A103	DRAFT/REVISE CORRESPONDENCE TO BRUCE EDWARDS (MEDIATOR) RE: OBJECTION TO THE ASSOCIATION'S CHAPTER 40 NOTICE TO FLIPPIN'S TRENCHING AND SOUTHERN NEVADA PAVING AND DEMAND THAT THEY BE EXCUSED FROM THE UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15 24.75
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND DEMAND FOR ANY DOCUMENTATION RELATING TO CULLIGAN'S IMPLICATION IN THE DEFECT CLAIMS, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
	DMC	L160	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS DEMAND FOR ANY DOCUMENTATION RELATING TO CULLIGAN'S IMPLICATION IN THE DEFECT CLAIMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
	DMC	L160	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING UPCOMING CHAPTER 40 MEDIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
09/21/2016	PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]	

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PANORAMA TOWER II

			Hours	
		[REDACTED]		
		(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551) (NO TRAVEL TIME INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE).	0.60	111.00
DMC	L160	A103 DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L160	A109 APPEAR FOR/ATTEND MEETING WITH SHANE STREAM OF HOLO DISCOVERY AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]		
		[REDACTED] (ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.50	82.50
DMC	L160	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM CAIRO PERSON OF JAMS ON BEHALF OF BRUCE EDWARDS (MEDIATOR) RE: REVISED STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L160	A103 DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L160	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM ASHLEY ALLARD OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]		
		[REDACTED]		

Hours

(137 PAGES) (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST)
REVIEW/ANALYZE PRIOR EXPERT REPORT
BY CHRIS ALLEN (PLAINTIFF'S
ARCHITECTURAL EXPERT) IN PRIOR
LITIGATION

0.15	24.75
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(TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST)
DRAFT/REVISE E-MAIL TO SHANE GODFREY
(AUDIO VISUAL) RE: [REDACTED]

0.15	24.75
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A101 PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]

0.05 8.25

(TIME SPLIT WITH OTHER FILE IN
SAME CASE - "PANORAMA TOWER II" -
1287.551).
REVIEW/ANALYZE DOCUMENTS FOR
UPCOMING CHAPTER 40 MEDIATION. RE:

0.40	74.00
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				Hours	
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	RAB	L320	A103 DRAFT/REVISE EMAIL TO SHANE FROM HOLO DISCOVERY SOLUTIONS, RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
09/23/2016	DMC	L120	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]		
			[REDACTED] (24 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]		
			[REDACTED] (34 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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PANORAMA TOWER II

Hours

Date	Party	Case No.	Item No.	Description	Hours	Fees
09/24/2016	DMC	L120	A109	APPEAR FOR/ATTEND WITH SHANE GODFREY (AUDIO VISUAL) AND MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE:		
				(REDACTED)		
				(ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	1.05	173.25
	DMC	L120	A103	DRAFT/REVISE CORRESPONDENCE TO PLAINTIFF RE: DEFENSE ANALYSIS OF EVIDENCE IN SUPPORT OF ARGUMENTS THAT THE ASSOCIATIONS NEW CLAIMS INVOLVING WINDOWS AND FIRE BLOCKING WERE PREVIOUSLY ALLEGED OR RELATED TO ALLEGATIONS SETTLED IN THE PRIOR LITIGATION, TENDER OF DEFENSE TO THE ASSOCIATION AND DEMAND FOR DEFENSE AND INDEMNITY OF CLAIMS PURSUANT TO THE TERMS OF THE PRIOR SETTLEMENT AGREEMENT INCLUDING SPECIFIC LANGUAGE IN SETTLEMENT AGREEMENT IN SUPPORT OF TENDER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
	DMC	L120	A103	DRAFT/REVISE RECEIPT OF COPY FOR CORRESPONDENCE TO PLAINTIFF RE: HAND DELIVERY BY BWBO COUNSEL OF TENDER OF CLIENTS' DEFENSE TO THE ASSOCIATION AND DEMAND FOR DEFENSE AND INDEMNITY OF CLAIMS PURSUANT TO THE TERMS OF THE PRIOR SETTLEMENT AGREEMENT IN PREPARATION FOR DELIVERY AT UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L120	A101	PLAN AND PREPARE FOR TODAY'S MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING		

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				Hours	
TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE: [REDACTED] [

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			Hours	
PCB	L160	A109	(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - PANORAMA TOWER II").	0.40
			APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - "PANORAMA TOWER II")(NO TRAVEL TIME INCLUDED IN THIS ENTRY).	74.00
PCB	L160	A109	APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - "PANORAMA TOWER II").	2.00
			TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	370.00
DMC	L160	A109	APPEAR FOR/ATTEND CHAPTER 40 MEDIATION (ATTENDANCE BY DMC AND PCB APPROVED BY CARRIER) (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	0.50
			RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	n/c
DMC	L160	A109	REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]	0.30
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	n/c
DMC	L120	A104	DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]	0.40
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	n/c
DMC	L120	A103	REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]	0.10
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	16.50
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]	0.05
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	8.25

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			Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	8.25
		A103	DRAFT/REVISE E-MAIL TO ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]	0.05
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	16.50
		A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]	0.10
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	8.25
		A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]	0.05
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	8.25
		A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE: [REDACTED]	0.05
DMC	L210	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	8.25
		A103	DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: ADD BREACH OF CONTRACT CLAIM FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST). (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	0.50

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				Hours	
09/27/2016	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05 8.25
	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05 8.25
	DMC	L120	A103	DRAFT/REVISE FOLLOW UP E-MAIL TO NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05 8.25
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] [REDACTED] (ADJUSTER FOR PRIOR LITIGATION) (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05 8.25
	DMC	L210	A103	DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE TERMS OF THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION REGARDING THE ASSOCIATION'S AGREEMENT TO DEFEND AND INDEMNIFY CLIENTS REGARDING FUTURE ACTIONS RELATING TO RELEASED CLAIMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.10 16.50
	DMC	L210	A103	DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS	

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			Hours	
		REGARDING THE NEW REQUIREMENTS UNDER AB 125 REGARDING EVIDENCE OF PHYSICAL DAMAGE TO PROPERTY AND THAT CHAPTER 40 NOTICES MUST IDENTIFY IN SPECIFIC DETAIL EACH DEFECT, DAMAGE AND INJURY, INCLUDING THE LOCATION OF THE DEFECT, DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.40	66.00
DMC	L210	A103 DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE CC&RS, INCLUDING UNIT BOUNDARIES, DEFINITION OF COMMON ELEMENTS AND UNIT OWNER MAINTENANCE RESPONSIBILITIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.40	66.00
DMC	L210	A103 DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION RELATING TO THE ASSOCIATION'S OBLIGATIONS TO DEFEND AND INDEMNIFY CLIENTS IN ANY SUBSEQUENT ACTION INVOLVING THE SETTLED AND RELEASE CLAIMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.20	33.00
DMC	L210	A103 DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: FIRST CLAIM FOR RELIEF REGARDING WHETHER THE ASSOCIATION'S CLAIMS ARE ALL TIME BARRED BY AB 125 AND/OR WHETHER THE ASSOCIATION HAS STANDING TO BRING CLAIMS INVOLVING WINDOWS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.10	16.50
DMC	L210	A103 DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: THIRD CLAIM FOR RELIEF REGARDING THE ASSOCIATION'S FAILURE TO COMPLY WITH CHAPTER 40 BY NOT SPECIFYING IN DETAIL EACH ALLEGED ALLEGED DEFECT, DAMAGE AND INJURY, INCLUDING THE EXACT LOCATION OF EACH DEFECT DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.10	16.50
DMC	L210	A103 DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A FIFTH CLAIM FOR		

Hours

0.30 49.50

0.50 82.50

0.50 82.50

0.05 8.25

0.05 8.25

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				Hours	
			NO./FILE PURSUANT TO CARRIER'S REQUEST)(NOTICE/REQUEST APPROVED BY CARRIER)	0.90	148.50
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05	8.25
DMC	L250	A104	REVIEW/ANALYZE INITIAL APPEARANCE FEE DISCLOSURE FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05	8.25
DMC	L250	A104	REVIEW/ANALYZE CLIENTS' DEMAND FOR JURY TRIAL FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05	8.25
DMC	L250	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.20	33.00
DMC	L250	A103	DRAFT/REVISE DETAILED RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO		

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				CARRIER'S REQUEST)	Hours	
					0.40	66.00
	RAB	L320	A104	REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40 MEDIATION, RE: [REDACTED]		
				[REDACTED]		
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.15	14.25
	PCB	L210	A103	DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF ACTION RE: ADDITIONAL ALLEGATIONS WITH REGARD TO THE SETTLEMENT AGREEMENT FROM THE ORIGINAL CASE (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - "PANORAMA TOWER II").	0.10	18.50
09/28/2016	RAB	L320	A103	DRAFT/REVISE EMAIL TO ALL COUNSEL, RE: INFORMATION RELATING TO THE LINK OT THE POWER POINT PRESENTATION. (TIME IS SPLIT WITH THE OTHER FILE 1287.558)	0.10	9.50
	RAB	L320	A103	DRAFT/REVISE (CONTINUE) MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: ADDING ADDITIONAL INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME IS SPLIT WITH THE OTHER FILE 1287.558)	0.10	9.50
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED]		
				[REDACTED]		
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE REVISE INITIAL LITIGATION BUDGET TO INCLUDE ADDITIONAL MOTION PRACTICE PURSUANT TO REQUEST BY CARRIER AT THE CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED]		
				[REDACTED]		

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			Hours	
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A103 DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L160	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR OLD CASTLE) RE: OUTCOME OF CHAPTER 40 MEDIATION, INCLUDING WHETHER THE ASSOCIATION MADE ANY SETTLEMENT DEMAND AND WHETHER ANY SETTLEMENT WAS REACHED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
09/29/2016	DMC	L210 A104 REVIEW/ANALYZE SUMMONS TO THE ASSOCIATION FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME AS COUNSEL ON BEHALF OF CLIENTS, IN PREPARATION FOR SERVICE ON THE ASSOCIATION WITH CLIENT'S COMPLAINT		

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					Hours	
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		0.05	8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS (CARRIER) RE: [REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRYDON OF ESIS (CARRIER) RE: [REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				[REDACTED]		
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
10/03/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION INCLUDING SETTLEMENT DISCUSSIONS WITH THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING SETTLEMENT DISCUSSIONS THAT TOOK PLACE AT THE RECENT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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				Hours	
10/07/2016	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE DECLARATORY RELIEF PLEADING, HIS REQUEST FOR AN EXTENSION OF TIME TO RESPOND TO SAME, AND HIS NEED FOR ADDITIONAL INFORMATION ON THE BASIS FOR THE DECLARATORY RELIEF POSITIONS TAKEN BY BWB&O ON BEHALF OF OUR CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 9.25
10/17/2016	DMC	L120	A104	REVIEW/ANALYZE COMMUNICATION FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
10/21/2016	RAB	L340	A104	REVIEW/ANALYZE POWER POINT PRESENTATION DOCUMENTS, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10 9.50
	RAB	L340	A104	REVIEW/ANALYZE EMAIL TO PLAINTIFF'S COUNSEL FRANCIS LYNCH, RE: POWER POINT PRESENTATION DOCUMENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10 9.50
10/26/2016	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE: [REDACTED]	

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				Hours	
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER (CARRIER) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
11/08/2016	DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
11/10/2016	RAB	L320	A104 REVIEW/ANALYZE OUR CLIENT'S PLEADINGS, RE: E-FILED COMPLAINT IN PREPARATION FOR CORRESPONDING WITH DEFENDANT OLDCASTLE BUILDING ENVELOPE FKA TEXAS WALL SYSTEMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	RAB	L320	A103 DRAFT/REVISE EMAIL TO DEFENDANTS OLDCASTLE BUILDING ENVELOPE FKA TEXAS WALL SYSTEMS, RE: INFORMATION RELATING TO THE COMPLAINT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
11/22/2016	PCB	L210	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF HIS MEETING WITH THE BOARD AND THE TIMING FOR THE RESPONSE TO THE TENDER OF DEFENSE. (TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II - 1287.551)	0.10	18.50
11/23/2016	PCB	L190	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR PLAINTIFF RE: CONTINUED DISCUSSION ABOUT THE TIMING FOR HIS CLIENT'S RESPONSE TO THE TENDER OF DEFENSE, THE TIMING FOR HIS CLIENT'S TENDER OF THE DEC RELIEF		

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			Hours	
		ACTION TO THE HOA'S CARRIER, AND THE TIMING OF HIS CLIENT'S FILING OF A RESPONSIVE PLEADING (TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II -1287.551).	0.20	37.00
PCB	L190	A103 DRAFT/REVISE EMAIL TO COUNSEL FOR THE HOA RE: CONFIRMATION OF AGREEMENTS REACHED DURING THIS MORNING'S PHONE CONVERSATION. (TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II - 1287.551).	0.10	18.50
For Current Services Rendered			29.00	4,894.50
Total Non-billable Hours			1.20	

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Peter C. Brown	PARTNER	10.90	\$185.00	\$2,016.50
Darlene M. Cartier	ASSOCIATE	16.55	165.00	2,730.75
Rachel A. Bounds	PARALEGAL	1.55	95.00	147.25

Expenses

09/26/2016	L100	E109	LOCAL TRAVEL (8799) DARLENE M. CARTIER (29.2 MILES AT \$.54/MILE FOR MEDIATION) SPLIT WITH 1287.558	7.88
09/29/2016	L100	E112	WIZ-NET (DEMAND FOR JURY TRIAL)	1.75
09/30/2016	L100	E101	REPRODUCTION COSTS FOR SEPTEMBER 2016 (1090 PAGES 0.08/PAGE)	43.60
10/11/2016	L100	E112	WIZ-NET (SUMMONS PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION)	1.75
10/31/2016	L100	E101	REPRODUCTION COSTS FOR OCTOBER 2016 (12 PAGES 0.08/PAGE)	0.48
11/03/2016	L100	E123	OTHER PROFESSIONALS (98118) HOLO DISCOVERY (DEPOSITORY SERVICES) (INVOICE NO. 1457) (SPLIT BETWEEN 1287.551 AND 1287.558) (TRIAL PREPARATION)	693.75
11/30/2016	L100	E101	REPRODUCTION COSTS FOR NOVEMBER 2016 (15 PAGES 0.08/PAGE)	0.60
Total Expenses				749.81
Total Current Work				5,644.31
Previous Balance				\$15,151.40
Balance Due				<u>\$20,795.71</u>

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<u>0-30</u>	<u>31-60</u>	<u>Past Due Amounts</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
16,623.10	0.00	0.00	0.00	0.00	0.00	4,172.61

Task Code Recapitulation

	<u>Fees</u>	<u>Expenses</u>
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	749.81
L120 ANALYSIS/STRATEGY	1464.50	0.00
L130 EXPERTS/CONSULTANTS	14.25	0.00
L140 DOCUMENT/FILE MANAGEMENT	28.50	0.00
L150 BUDGETING	33.00	0.00
L160 SETTLEMENT/NON-BINDING ADR	2253.25	0.00
L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	64.75	0.00
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	3,858.25	749.81
L210 PLEADINGS	593.75	0.00
L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS	338.00	0.00
L200 PRE-TRIAL PLEADINGS AND MOTIONS	931.75	0.00
L320 DOCUMENT PRODUCTION	85.50	0.00
L340 EXPERT DISCOVERY	19.00	0.00
L300 DISCOVERY	104.50	0.00

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

Final Statement Run Totals 03/03/2017

Statements Printed:	1
Hours:	29.00
Fees:	4,894.50
Expenses:	749.81

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

CHUBB INSURANCE
10 Exchange Place
9th floor
Jersey City NJ 07302

Attn: Jeff Ganzer

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Account No: 1287-5511V
Statement No: 8

Fees

					Hours	
06/15/2016	JBV	L320	A107	COMMUNICATE WITH COUNSEL FOR CULLIGAN WATER, RE: REQUEST FOR STATUS OF CASE AND WHEN INSPECTIONS WILL TAKE PLACE, IN PREPARATION FOR INFORMING COUNSEL SHOULD ANY NEW INFORMATION ARISE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CHAPTER 40 CLAIM AND REQUESTING STATUS OF PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/17/2016	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLING) RE: CHAPTER 40 CLAIM AND REQUESTING STATUS OF PRE-LITIGATION PROCESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/20/2016	DMC	L120	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING CHAPTER 40 CLAIM AND STATUS OF PRE-LITIGATION PROCESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/22/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE		

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				Hours	
STATUS PURSUANT TO HIS REQUEST, INCLUDING SELECTION OF MEDIATOR FOR CHAPTER 40 MEDIATION AND THE HOA'S ALLEGATION RELATING TO THE MECHANICAL PIPING BELIEVED TO BE WITHIN CULLIGAN'S SCOPE OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.05	8.25
06/23/2016	DMC	L120	A104 REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE STATUS UPDATE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
06/29/2016	PCB	L120	A103 DRAFT/REVISE (FINALIZE) FIRST SUIT REPORT RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	111.00
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC	L120	A104 REVIEW/ANALYZE BRIEF RESEARCH RE: EDWARD SONG AND SCOTT WILLIAMS TO DETERMINE THEIR BACKGROUND AND EXPERIENCE IN PREPARATION FOR DRAFTING INITIAL REPORT TO CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT		

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		TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L120	A103	DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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06/30/2016	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L120	A103 DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L250	A104 REVIEW/ANALYZE LETTER FROM COUNSEL FOR HOA TO MEDIATOR DISCUSSING THE ISSUES THAT ARE THE SUBJECT OF THE NEW CHAPTER 40 NOTICE (IN PREPARATION FOR CONFERENCE CALL WITH THE MEDIATOR). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L160	A109 APPEAR FOR/ATTEND CONFERENCE CALL WITH MEDIATOR (BRUCE EDWARDS) AND COUNSEL FOR THE HOA RE: DISCUSSION OF THE PRE-LITIGATION ISSUES THAT NEED TO BE TAKEN CARE OF BEFORE THE CASE MOVES TO FORMAL LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	46.25
	DMC	L120	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BRUCE EDWARDS (MEDIATOR) AND SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO PRE-LITIGATION PROCESS, INCLUDING THE CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	41.25
	DMC	L120	A103 DRAFT/REVISE E-MAIL TO WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE RESPONSE E-MAIL FROM WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO J. ALBREGTS (COUNSEL FOR SUBCONTRACTOR FLIPPIN'S TRENCHING) RE: REQUESTING STATUS OF FLIPPIN'S TENDER TO ITS INSURANCE CARRIER, TO DETERMINE WHETHER ANY ACTION CORRESPONDENCE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: PRIOR COMMUNICATIONS WITH SILVER STAR PLUMBING REGARDING CLAIMANT'S IMPROPER CHAPTER 40 NOTICE AND THAT SILVER STAR NEVER PERFORMED WORK ON THE PANORAMA TOWERS PROJECT, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO BERNADETTE TIONGSON (COUNSEL FOR SUBCONTRACTOR INSULPRO) RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
DMC	L120	A104	REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: PRIOR COMMUNICATIONS WITH SUBCONTRACTOR SOUTHERN NEVADA PAVING INCLUDING CONTRACT WITH MJ DEAN (17 PAGES), CERTIFICATE OF ENROLLMENT IN OCIP (1 PAGE) AND SOUTHERN NEVADA PAVING'S DEMAND FOR CLAIMANT TO WITHDRAW ITS CHAPTER 40 NOTICE, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15 24.75
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: SUBCONTRACTORS CLAIMANT PLACED ON NOTICE OF THE CLAIM AND REQUEST FOR	

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			INFORMATION WE HAVE RELATING TO SAME, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L110	A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR HOA TO COUNSEL FOR SNP, REVIEW FILE MATERIALS, AND SEND EMAIL TO COUNSEL FOR SNP REGARDING THE NEW CHAPTER 40 CLAIM. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L120	A101 PLAN AND PREPARE FOR UPCOMING MEDIATION AS WELL AS ANTICIPATED DECLARATORY RELIEF ACTION (IF APPROVED BY CARRIER) FOLLOWING CONFERENCE CALL WITH PLAINTIFF'S COUNSEL AND THE MEDIATOR RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	55.50
07/01/2016	PCB	L190	A103 DRAFT/REVISE (FINALIZE) NOTICE OF CLAIM/TENDER OF DEFENSE TO ENDURANCE RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
	PCB	L190	A104 REVIEW/ANALYZE EMAIL FROM COUNSEL FOR THE HOA TO COUNSEL FOR SOUTHERN NEVADA PAVING, IDENTIFY ISSUES THAT ARE PROBABLY INCORRECT, AND SEND SEPARATE EMAIL TO COUNSEL FOR SNP DISCUSSING SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25
	PCB	L110	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR SOUTHERN NEVADA PAVING RE: CONTINUED DISCUSSION OF THE NOTICE HIS CLIENT RECEIVED FROM PLAINTIFF. (TIME SPLIT WITH OTHER CLAIM		

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				NO./FILE PER CARRIER REQUEST)	Hours	
					0.15	27.75
07/14/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	PCB	L190	A108	COMMUNICATE (OTHER EXTERNAL) WITH VICKI KUNZ (BOMBARD) RE: DISCUSSION OF OVERALL CASE STATUS, ISSUES RELATED TO THE CHAPTER 40 NOTICE BOMBARD RECEIVED FROM PLAINTIFF, POTENTIAL RESPONSE TO SAME, [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	37.00
07/15/2016	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S CHAPTER 40 NOTICES TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION, (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICES, IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S COMPLAINT AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S AMENDED COMPLAINT AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L210	A102	RESEARCH DOCTRINES OF ISSUE	0.05	8.25

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		PRECLUSION AND CLAIM PRECLUSION RE: CURRENT CASE LAW AND LEGAL AUTHORITY IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.70	115.50
DMC	L210	A103 DRAFT/REVISE (BEGIN) COMPLAINT FOR DECLARATORY RELIEF RE: PARTIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: JURISDICTION AND VENUE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) GENERAL ALLEGATIONS - APPLICABILITY OF AB 125. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.55	90.75
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) GENERAL ALLEGATIONS - CLAIMS RELATE TO OR ARISE OUT OF PRIOR SETTLED LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.70	115.50
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FIRST CLAIM FOR RELIEF - DECLARATORY RELIEF REGARDING APPLICATION OF AB 125. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: SECOND CLAIM FOR RELIEF - CLAIM PRECLUSION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	107.25
DMC	L210	A103 DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: PRAYER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75
DMC	L210	A104 REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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	DMC	L210	A103	DRAFT/REVISE RESPONSE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) WITH COPY TO MICHAEL DEAN (CLIENT MJ DEAN) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
07/18/2016	PCB	L210	A104	REVIEW/ANALYZE NEW CD STATUTE AND CLIENTS' RESPONSE TO THE CHAPTER 40 NOTICE [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
07/19/2016	RAB	L320	A104	REVIEW/ANALYZE DISMISSAL AND EARLY ENTRY ORDER RELATING TO OUR CLIENT IN ANOTHER CASE, RE: IDENTIFYING AND OBTAINING PLEADINGS IN THE PRIOR LITIGATION IN SUPPORT OF CLIENT'S COMPLAINT FOR DECLARATORY RELIEF AS PER REQUEST FROM ATTORNEY FOR REVIEW. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	14.25
08/02/2016	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: SUPPLEMENT GENERAL ALLEGATIONS REGARDING PLAINTIFF'S FAILURE TO PROPERLY IDENTIFY THE ALLEGED DAMAGES AND LOCATION OF DEFECTS ALLEGED IN ITS CHAPTER 40 NOTICE AND OUR REQUESTS TO THE ASSOCIATION REGARDING ITS PRIOR REPAIRS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25
	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: THIRD CLAIM FOR RELIEF - FAILURE TO COMPLY WITH NRS 40. 600 ET SEQ. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
	DMC	L210	A103	DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FOURTH CLAIM FOR RELIEF - SUPPRESSION OF EVIDENCE/SPOILIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		

				REQUEST)	Hours 0.15	24.75
08/03/2016	DMC	L120	A104	REVIEW/ANALYZE COMMUNICATION FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO TRACY JIN AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	REVIEW/ANALYZE RESPONSE E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/05/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: CLAIMANT'S DEMAND FOR		

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			CHAPTER 40 MEDIATION AND PROPOSED STRATEGIES RELATING TO SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC L160	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO BRUCE EDWARDS (MEDIATOR) RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/09/2016	DMC L120	A104	REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC L120	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/10/2016	DMC L120	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH TOM LYNN (COUNSEL FOR VICTUALIC) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/11/2016	DMC L210	A103	DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION RE: GENERAL ALLEGATIONS AND ADDITIONAL FACTUAL SUPPORT FOR CAUSES OF ACTION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
	DMC L160	A104	REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL		

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			COUNSEL RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: MEDIATOR'S PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: CASE STATUS, INCLUDING MANDATORY CHAPTER 40 MEDIATION AND CLAIMS AGAINST HIS CLIENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
08/12/2016	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104 REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION.		

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			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)		0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: INSPECTIONS OF THE ALLEGED DEFECTS AND CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: OUR CLIENT'S INSPECTIONS OF THE ALLEGED DEFECTS AND NO ANTICIPATED ADDITIONAL INSPECTIONS UNTIL AFTER THE CASE PROCEEDS TO LITIGATION AND REGARDING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: REQUEST FOR DEFECT LIST AND COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: PLAINTIFF HAS NOT ISSUED A DEFECT LIST OR A COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
08/18/2016	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR CARRIER FOR VICTAULIC RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
08/19/2016	PCB	L190	A104	REVIEW/ANALYZE LETTER FROM COUNSEL FOR VICTUALIC, REVIEW THE ORIGINAL SETTLEMENT AGREEMENT, AND PREPARE EMAIL TO COUNSEL EXPLAINING WHY THE SETTLEMENT AGREEMENT CANNOT BE DISCLOSED DUE TO A CONFIDENTIALITY CLAUSE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25
08/23/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER		

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					Hours	
(CARRIER) RE: [REDACTED]						
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)					0.05	8.25
08/24/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) TO DAVID CASTILLO OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL R E: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO TO SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION.(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO ROBERT SCHUMACHER AND THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
					0.05	8.25
For Current Services Rendered					15.30	2,549.00

Recapitulation

Timekeeper	Title	Hours	Rate	Total
Peter C. Brown	PARTNER	2.10	\$185.00	\$388.50
Jennifer Vela	PARALEGAL	0.10	95.00	9.50
Darlene M. Cartier	ASSOCIATE	12.95	165.00	2,136.75
Rachel A. Bounds	PARALEGAL	0.15	95.00	14.25

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AA2992

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Expenses

06/01/2016	L100	E123	OTHER PROFESSIONALS (5102) EMP CONSULTANTS, INC. (CONSULTATION SERVICES) (INVOICE NO.: 30054)	60.00
06/30/2016	L100	E101	REPRODUCTION COSTS FOR JUNE 2016 (46 PAGES AT .08/PAGE)	1.84
07/31/2016	L100	E101	REPRODUCTION COSTS FOR JULY 2016 (132 PAGES AT .08/PAGE)	5.28
08/01/2016	L100	E123	OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (CONSULTING SERVICES) (INVOICE NO.: 1119903)	457.50
08/31/2016	L100	E101	REPRODUCTION COSTS FOR AUGUST 2016 (136 PAGES AT .08/PAGE)	5.44
			Total Expenses	530.06
			Total Current Work	3,079.06
			Previous Balance	\$8,302.26
			Balance Due	<u>\$11,381.32</u>

Past Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
11,381.32	0.00	0.00	0.00	0.00	0.00

Task Code Recapitulation

		<u>Fees</u>	<u>Expenses</u>
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	530.06
L110	FACT INVESTIGATION/DEVELOPMENT	46.25	0.00
L120	ANALYSIS/STRATEGY	1272.00	0.00
L160	SETTLEMENT/NON-BINDING ADR	211.25	0.00
L190	OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	92.50	0.00
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	1,622.00	530.06
L210	PLEADINGS	884.75	0.00
L250	OTHER WRITTEN MOTIONS AND SUBMISSIONS	18.50	0.00
L200	PRE-TRIAL PLEADINGS AND MOTIONS	903.25	0.00
L320	DOCUMENT PRODUCTION	23.75	0.00
L300	DISCOVERY	23.75	0.00

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number
on all payments.

Final Statement Run Totals 03/02/2017

Statements Printed:	1
Hours:	15.30
Fees:	2,549.00
Expenses:	530.06

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

ESIS Dallas AGL Claims
P.O. Box 5127
Scranton, PA 18505
USA

Attn: Sherilyn Brydon

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Fees

				Hours	
03/02/2017	DMC	L230	A101 PLAN AND PREPARE FOR FIRST SPECIAL MASTER HEARING RE: [REDACTED]		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	107.25
	DMC	L210	A104 REVIEW/ANALYZE THE ASSOCIATION'S ANSWER TO CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AND THE ASSOCIATION'S COUNTERCLAIM AGAINST CLIENTS IN PREPARATION FOR STATUS REPORT TO CARRIER AND DRAFTING CLIENTS' ANSWER TO COUNTERCLAIM (34 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
	DMC	L120	A103 DRAFT/REVISE E-MAIL WITH ENCLOSURE TO JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: PLAINTIFF'S FORTHCOMING CROSS CLAIM AGAINST SOUTHERN NEVADA PAVING AND STRATEGIES RELATING TO TODAY'S SPECIAL MASTER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC	L230	A109 TRAVEL TO JAMS TO ATTEND SPECIAL MASTER HEARING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	n/c
	DMC	L230	A109 APPEAR FOR/ATTEND ATTEND SPECIAL MASTER HEARING (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.55	90.75
	DMC	L230	A109 RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT SPECIAL MASTER HEARING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	n/c
	DMC	L230	A101 PLAN AND PREPARE FOR FIRST SPECIAL MASTER HEARING RE: [REDACTED]		

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				Hours	
[REDACTED]					
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)				0.32	56.87
DMC	L210	A104	REVIEW/ANALYZE THE ASSOCIATION'S ANSWER TO CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AND THE ASSOCIATION'S COUNTERCLAIM AGAINST CLIENTS IN PREPARATION FOR STATUS REPORT TO CARRIER AND DRAFTING CLIENTS' ANSWER TO COUNTERCLAIM (34 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
DMC	L120	A103	DRAFT/REVISE E-MAIL WITH ENCLOSURE TO JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: PLAINTIFF'S FORTHCOMING CROSS CLAIM AGAINST SOUTHERN NEVADA PAVING AND STRATEGIES RELATING TO TODAY'S SPECIAL MASTER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L230	A109	APPEAR FOR/ATTEND ATTEND SPECIAL MASTER HEARING (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.27	48.12
03/03/2017	DMC	L120	A104 REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: SPECIAL MASTER HEARING REGARDING DISCOVERY STATUS AND DISCOVERY SCHEDULING, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: SPECIAL MASTER HEARING REGARDING DISCOVERY STATUS AND DISCOVERY SCHEDULING, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.37
03/08/2017	DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: REQUESTING PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: REQUESTING PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A103 DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: [REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A104 REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL		

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				Hours		
			RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75	
DMC	L120	A103	DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FORTHCOMING RESPONSE REGARDING DESIGNATING A MEDIATOR PENDING COMMUNICATION WITH CARRIER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75	
DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75	
DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: REQUESTING PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75	
DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE WITH COPY TO PLAINTIFF'S COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12	
DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12	
DMC	L120	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12	
DMC	L120	A103	DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FORTHCOMING RESPONSE REGARDING DESIGNATING A MEDIATOR PENDING COMMUNICATION WITH CARRIER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12	
DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED] [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12	
03/09/2017	DMC	L160	A104	REVIEW/ANALYZE FURTHER E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FURTHER DISCUSSION REGARDING SPECIAL MASTER'S		

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				Hours	
			REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L120	A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED]		
			[REDACTED]	0.05	8.25
03/10/2017	DMC	L120	A104 REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER I, [REDACTED]		
			[REDACTED]	0.05	8.25
	DMC	L120	A104 REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER II, [REDACTED]		
			[REDACTED]	0.10	16.50
03/14/2017	DMC	L120	A103 DRAFT/REVISE INTERNAL MEMORANDUM RE: DISCOVERY STRATEGIES/DISCOVERY PLAN [REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
	DMC	L210	A103 DRAFT/REVISE (BEGIN) CLIENTS' ANSWER TO THE ASSOCIATION'S COUNTERCLAIM RE: OPENING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
03/15/2017	DMC	L240	A104 REVIEW/ANALYZE AB 125 RE: SPECIFIC AMENDMENTS TO CHAPTER 40 RELATING TO A CLAIMANT'S REQUIREMENTS FOR A CONSTRUCTION DEFECT NOTICE AND TO BE IN ATTENDANCE AT A CONTRACTOR'S INSPECTIONS, [REDACTED]		
			[REDACTED]		
			[REDACTED]		
			[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
	DMC	L240	A104 REVIEW/ANALYZE THE ASSOCIATION'S CIVIL ENGINEER'S EXPERT REPORT RE: ALLEGED DEFECTS AND DAMAGES TO THE MECHANICAL ROOM PIPING AND RECOMMENDED REPAIRS, IN ORDER TO INCLUDE ARGUMENTS IN CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
	DMC	L240	A103 DRAFT/REVISE CLIENTS' MOTION FOR SUMMARY		

				Hours	
			JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: AFFIDAVIT OF ATTORNEY PETER BROWN IN SUPPORT OF MOTION, INCLUDING CITATIONS TO EXHIBITS IN SUPPORT OF MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.95	156.75
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) PROCEDURAL HISTORY - (A) THE ASSOCIATION'S CHAPTER 40 NOTICE, INCLUDING SUMMARY OF ALLEGED DEFECTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65	107.25
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) PROCEDURAL HISTORY - (B) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, INCLUDING CAUSES OF ACTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	49.50
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: DETAILED SUMMARY OF UNDISPUTED FACTS, INCLUDING CITATIONS TO ATTORNEY AFFIDAVIT AND SPECIFIC EXHIBITS IN SUPPORT OF FACTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.90	148.50
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL STANDARD FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
DMC	L240	A103	DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO		

			Hours	
		COMPLY WITH NRS 40.645(2)(b): INTRODUCTION TO LEGAL ARGUMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.55	90.75
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (1) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL WINDOW DEFECT ALLEGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (2) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL FIREBLOCKING DEFECT ALLEGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	33.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (3) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S MECHANICAL PIPING DEFECT ALLEGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	57.75
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (4) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S SEWER LINE DEFECT ALLEGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (B) THE ASSOCIATION DENIED CLIENTS' THEIR RIGHTS UNDER CHAPTER 40 BY FAILING TO PROVIDE NOTICE PRIOR TO PERFORMING REPAIRS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	66.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S		

					Hours	
03/20/2017	DMC	L160	A104	COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75
			A104	REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
			A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR AND FORTHCOMING FOLLOW UP WITH CARRIER REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: ADDITIONAL DISCUSSION REGARDING SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
			A103	DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: ADDITIONAL DISCUSSION REGARDING SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR, AND PROPOSED STRATEGIES PENDING CARRIER'S RESPONSE ((TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25
	DMC	L160	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: [REDACTED]	0.05	8.25
			A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED]	0.05	8.25
	PCB	L240	A103	DRAFT/REVISE (FINALIZE) MOTION FOR SUMMARY JUDGMENT ON THIRD CAUSE OF ACTION RE: ADDITIONAL DISCUSSION OF THE FAILURE OF THE HOA TO ADEQUATELY	0.05	8.25

				Hours	
	RHR	L120	A104	PRESERVE EVIDENCE AND THE HOA'S FAILURE TO PROVIDE CHAPTER 40 NOTICE FOR CERTAIN ISSUES (TIME SPLIT WITH OTHER FILE IN SAME CASE/OTHER TOWER - AS PER CARRIER REQUEST).	0.10 18.50
				REVIEW/ANALYZE CASE FILE INCLUDING DISCOVERY, DEPOSITORY INDEX, COMPLAINT, ANSWER COUNTERCLAIM, AND OTHER RELEVANT IN PREPARATION TO SUBPOENA DOCUMENTS FROM DEPARTMENT WITH RECORDS OF CITATION MORE SPECIFICALLY TO PREPARE AND PLAN TO RESEARCH PROPER DEPARTMENT WITH RECORDS ON CITATIONS ISSUED TO PLAINTIFF.	0.45 74.25
03/23/2017	PCB	L240	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE LATEST MOTION FILED BY THE DEFENSE AND WHY IT WAS FILED.	0.05 9.25
03/24/2017	PCB	L240	A103	DRAFT/REVISE EMAIL TO COUNSEL FOR HOA RE: CONFIRMATION OF AGREEMENT TO EXTEND HEARING DATE FOR MOTION FOR SUMMARY JUDGMENT AND TIMING FOR RESPONSE TO SAME (TIME SPLIT WITH OTHER FILE IN SAME CASE - OTHER TOWER - AS PER CARRIER REQUEST).	0.05 9.25
03/27/2017	DMC	L240	A103	DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S OPPOSITION TO CLIENTS' MOTION FOR SUMMARY JUDGMENT AND HEARING ON MOTION	0.05 8.25
	DMC	L250	A104	REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: CASE MANAGEMENT ORDER ENTERED BY THE COURT, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS	0.05 8.25
03/28/2017	DMC	L120	A105	COMMUNICATE (IN FIRM) WITH PARTNER PETER BROWN RE: DEFENSE STRATEGIES [REDACTED]	
				[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.25
	PCB	L240	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA (TWO SEPARATE CALLS) RE: DISCUSSION ABOUT THE MOTION FOR PARTIAL SUMMARY JUDGMENT, PLAINTIFF'S REQUEST FORM ADDITIONAL TIME, MOVING THE HEARING DATE, AND ISSUES RELATED TO THE OVERALL CASE (TIME SPLIT WITH OTHER FILE - SECOND TOWER/DIFFERENT CLAIM NUMBER - AS REQUESTED BY CARRIER).	0.10 18.50
03/30/2017	RAB	L320	A104	REVIEW/ANALYZE CLARK COUNTY RECORDER OFFICE DOCUMENTS, RE: DEVELOPER SERVICES AGREEMENT IN PREPARATION FOR RECEIVING DOCUMENTS FOR REVIEW AND ANALYSIS OF THE CASE.	0.10 9.50
03/31/2017	PCB	L190	A103	DRAFT/REVISE RESPONSE TO PLAINTIFF'S ALLEGED "NOTICE" OF NEW WINDOW ISSUE, INCLUDING DISCUSSION	

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OF WHAT CONSTITUTES AN ACTUAL CHAPTER 40 NOTICE, THE ISSUES SURROUNDING THE WINDOW REPAIRS, AND STATUTE OF REPOSE ISSUES (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER CARRIER REQUEST).				0.25	43.75
04/03/2017	DMC	L120	A103	DRAFT/REVISE (BEGIN) SUPPLEMENTAL STATUS REPORT TO CARRIER RE: [REDACTED]	
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.85
	DMC	L120	A103	DRAFT/REVISE (CONTINUE) SUPPLEMENTAL STATUS REPORT TO CARRIER RE: [REDACTED]	148.75
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.65
					113.75
04/04/2017	DMC	L240	A104	REVIEW/ANALYZE ORDER EXECUTED BY THE COURT RE: CLIENTS' MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION AND STIPULATION TO CONTINUE DEADLINES FOR BRIEFING AND HEARING DATE, IN ORDER TO DETERMINE IF ANY ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
	DMC	L120	A103	[REDACTED]	8.75
					0.05
	DMC	L120	A103	[REDACTED]	8.75
					0.05
					8.75
04/05/2017	MD	L320	A104	REVIEW/ANALYZE CASE MANAGEMENT ORDER RE: ANALYSIS OF PRETRIAL INFORMATION AND CONFIRMATION OF UPCOMING PRETRIAL DEADLINES IN PREPARATION FOR INSURANCE QUESTIONNAIRE, SPECIAL INTERROGATORIES AND STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.20
					19.00
	MD	L320	A103	DRAFT/REVISE BEGIN RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" RE: INSURANCE QUESTIONNAIRE IN PREPARATION FOR COMPLETION OF DEFENDANTS RESPONSES TO CASE MANAGEMENT ORDER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15
					14.25
	DMC	L120	A104	REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: MODIFICATION OF BRIEFING SCHEDULE AND CONTINUATION OF HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING WITH THE COURT AND SERVICE ON OPPOSING COUNSEL	0.05
					8.75

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04/06/2017	MD	L320	A103	DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" RE: SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.35 33.25
	DMC	L250	A104	REVIEW/ANALYZE COMMUNICATION FROM THE COURT RE: ARBITRATION SELECTION LIST PROVIDING RANDOM LIST OF ARBITRATORS PURSUANT TO RULE 6 OF NEVADA ARBITRATION RULES, AND INSTRUCTIONS TO PROVIDE RESPONSE TO ADR COMMISSIONER WITHIN TEN DAYS, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (4 PAGES)	0.05 8.75
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]	
				[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.75
	DMC	L120	A103	DRAFT/REVISE RESPONSE WITH ENCLOSURE TO E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]	
				[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 8.75
04/07/2017	MD	L320	A104	REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.05 4.75
	MD	L320	A104	REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.05 4.75
	MD	L320	A104	REVIEW/ANALYZE CLARK COUNTY BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10 9.50
	MD	L320	A104	REVIEW/ANALYZE NEVADA STATE CONTRACTORS BOARD WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10 9.50
	MD	L320	A104	REVIEW/ANALYZE LAS VEGAS BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10 9.50
	MD	L320	A104	REVIEW/ANALYZE CLARK COUNTY CLERK'S OFFICE	

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		FICTITIOUS NAME SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORY NUMBER 5 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10	9.50
MD	L320	A104 REVIEW/ANALYZE PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM INSURANCE MANUAL RE: INSURANCE INFORMATION IN PREPARATION FOR RESPONSES TO CASE MANAGEMENT ORDER SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.30	28.50
MD	L320	A104 REVIEW/ANALYZE WESTCHESTER EXCESS POLICY RE: INSURANCE INFORMATION IN PREPARATION FOR LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC'S RESPONSES TO CASE MANAGEMENT ORDER SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.30	28.50
MD	L320	A104 REVIEW/ANALYZE PRIOR LITIGATION DISCOVERY RE: CASE MANAGEMENT ORDER RESPONSES AND DISCOVERY IN PREPARATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER'S RESPONSES TO SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.35	33.25
DMC	L120	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING WHETHER THE ASSOCIATION WILL SEEK AN EXEMPTION IN LIGHT OF ITS COUNTERCLAIM AND THIRD-PARTY CLAIM AND IN LIGHT OF THE AMOUNT OF THE ASSOCIATION'S ALLEGED POTENTIAL DAMAGES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: ADDITIONAL DISCUSSION REGARDING PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING THE ASSOCIATION'S PROPOSAL TO SEEK AN EXEMPTION IN LIGHT OF ITS COUNTERCLAIM AND THIRD-PARTY CLAIM AND IN LIGHT OF THE AMOUNT OF THE ASSOCIATION'S ALLEGED POTENTIAL DAMAGES AND REQUEST THAT CLIENTS NOT OBJECT TO SAME, IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
MD	L320	A104 REVIEW/ANALYZE CITY OF HENDERSON BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
MD	L320	A104 REVIEW/ANALYZE NORTH LAS VEGAS BUSINESS LICENSING DEPARTMENT WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES		

					Hours	
				TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	MD	L320	A103	DRAFT/REVISE (CONTINUE) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" SPECIAL INTERROGATORIES RE: INSURANCE INFORMATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.40	38.00
	MD	L320	A104	REVIEW/ANALYZE SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS II, LLC IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1-4.	0.10	9.50
04/10/2017	DMC	L120	A103	DRAFT/REVISE RESPONSE TO E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING THE ASSOCIATION'S MOTION FOR EXEMPTION FROM ARBITRATION IN EXCHANGE FOR AGREEMENT NOT TO OPPOSE SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/11/2017	MD	L320	A103	DRAFT/REVISE (BEGIN) DRAFT OF INSURANCE SPREADSHEET IN PREPARATION FOR EXHIBIT A TO RESPONSES TO INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.20	19.00
	MD	L320	A103	DRAFT/REVISE (BEGIN) DRAFT OF LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.20	19.00
	MD	L320	A103	DRAFT/REVISE (BEGIN) DRAFT OF M.J. DEAN CONSTRUCTION, INC.'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.20	19.00
	MD	L320	A103	DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" RE: INSURANCE QUESTIONNAIRE IN PREPARATION FOR COMPLETION OF PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.15	14.25
	DMC	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: RESPONSE TO CLIENT'S OBJECTION TO THE ASSOCIATION'S INTENT TO PERFORM REPAIRS TO UNIT 200 AND FAILURE TO PROVIDE CHAPTER 40 NOTICE OF SAME, AND STATING THAT THE ASSOCIATION DOES NOT INTEND TO PURSUE A CHAPTER 40 CLAIM RELATING TO THIS ISSUE, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/12/2017	MD	L320	A103	DRAFT/REVISE (BEGIN) M.J. DEAN RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" SPECIAL INTERROGATORIES RE: INSURANCE INFORMATION.	0.35	33.25

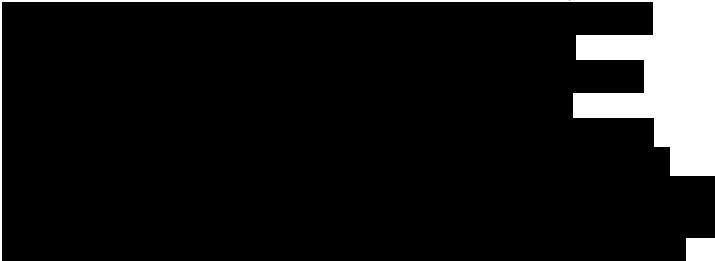
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04/17/2017	MD	L320	A104	REVIEW/ANALYZE (BEGIN) REVIEW OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM RE: CONTRACT LIST IN PREPARATION FOR MATRIX TO BE USED IN RESPONSES TO CASE MANAGEMENT ORDER STATEMENT OF WORK FOR PLAINTIFF M.J. DEAN CONSTRUCTION, INC (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.55
					52.25
	MD	L320	A103	DRAFT/REVISE (BEGIN) MATRIX OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM CONTRACT LIST RE: NAME OF CONTRACTOR, CONTRACT START AND END DATE, DESCRIPTION OF WORK, ORIGINAL SELF PERFORMED CONTRACT VALUE, CHANGE ORDER, AND TOTAL CONTRACT VALUE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.65
					61.75
04/18/2017	MD	L320	A104	REVIEW/ANALYZE (CONTINUE) REVIEW OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM RE: CONTRACT LIST IN PREPARATION FOR MATRIX TO BE USED IN RESPONSES TO CASE MANAGEMENT ORDER STATEMENT OF WORK FOR PLAINTIFF M.J. DEAN CONSTRUCTION, INC (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.70
					66.50
	MD	L320	A103	DRAFT/REVISE (CONTINUE) MATRIX OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM CONTRACT LIST RE: NAME OF CONTRACTOR, CONTRACT START AND END DATE, DESCRIPTION OF WORK, ORIGINAL SELF PERFORMED CONTRACT VALUE, CHANGE ORDER, TOTAL CONTRACT VALUE, AND TOWER WHERE CONTRACTOR/SUBCONTRACTOR WORKED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.80
					76.00
	MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN CONSTRUCTION, INC.'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.15
					14.25
	MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.15
					14.25
	MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.15
					14.25
	MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.15
					14.25
	MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE)	

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		PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10	9.50
MD	L320	A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10	9.50
DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: CASE STATUS, OUTCOME OF RECENT SPECIAL MASTER HEARING AND WHETHER BWBO WILL BE DEFENDING SOUTHERN NEVADA PAVING AGAINST THE ASSOCIATION'S CROSS-CLAIM, IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104 REVIEW/ANALYZE COMMUNICATION FROM THE ASSOCIATION'S RE: UNSTAMPED/UNFILED BUT EXECUTED REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY OPPOSITION OR OTHER ACTION IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S REQUEST FOR EXEMPTION FROM ARBITRATION, THE ASSOCIATION'S PENDING CROSS CLAIM AND SERVICE OF SAME, IN PREPARATION FOR STATUS REPORT TO CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103 DRAFT/REVISE RESPONSE (WITH MULTIPLE ENCLOSURES) TO E-MAIL FROM JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: CASE STATUS, OUTCOME OF RECENT SPECIAL MASTER HEARING, THAT BWBO HAS NOT BEEN RETAINED TO DEFEND SOUTHERN NEVADA PAVING AGAINST THE ASSOCIATION'S CROSS-CLAIM AND THAT THE ASSOCIATION HAS NOT BEGUN SERVICE OF ITS CROSS-CLAIM. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L250	A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S FILE STAMPED REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY	0.05	8.75
DMC	L120	A103 DRAFT/REVISE E-MAIL TO JEFFREY GANZER (ADJUSTER) RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103 DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]		
		[REDACTED] (TIME SPLIT WITH OTHER CLAIM		

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				NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/19/2017	DMC	L250	A104	REVIEW/ANALYZE THE ASSOCIATION'S NOTICE OF FILING OF IT'S REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER ACTION IS NECESSARY (8 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/20/2017	DMC	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM DEE HOPPER (COUNSEL FOR THE ASSOCIATION) TO SPECIAL MASTER HALE RE: REQUEST FOR STAY OF CASE MANAGEMENT ORDER DEADLINES PENDING THE COURT'S RULING ON CLIENT'S MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A104	REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.25	43.75
	DMC	L120	A104	REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSE TO CASE MANAGEMENT ORDER STATEMENT OF WORK (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY, AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	DMC	L120	A104	REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSE TO CASE MANAGEMENT ORDER INSURANCE QUESTIONNAIRE (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	17.50
	DMC	L120	A104	REVIEW/ANALYZE EXHIBIT TO CLIENT MJ DEANS RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES AND STATEMENT OF WORK (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (25 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
	DMC	L120	A104		0.10	17.50

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			BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY, AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104		0.05	8.75
DMC	L120	A104	REVIEW/ANALYZE EXHIBIT TO CLIENTS' RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES AND INSURANCE QUESTIONNAIRE (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/21/2017	MD	L320	A103 DRAFT/REVISE CORRESPONDENCE TO ALL COUNSEL RE: SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10	9.50
	MD	L320	A103 DRAFT/REVISE SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT RE: RECORDS FOR CITATIONS AND INSPECTIONS AT PANORAMA TOWERS.		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	14.25
DMC	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM FLOYD HALE TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: 30-DAY EXTENSION TO PROVIDE THE ASSOCIATION'S DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103	DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: CLIENTS' FORTHCOMING REQUEST FOR 30-DAY EXTENSION TO PROVIDE CLIENTS' DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103	DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: REQUEST FOR EXTENSION TO PROVIDE CLIENTS' RESPONSES TO CASE MANAGEMENT ORDER WRITTEN DISCOVERY, IN LIGHT OF CLIENTS' PENDING MOTIONS FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A104	REVIEW/ANALYZE SUBPOENA DUCES TECUM TO THE SOUTHERN NEVADA HEALTH DISTRICT (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN		

				Hours	
			PREPARATION FOR SERVICE OF PROCESS ON THE WITNESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104	REVIEW/ANALYZE NOTICE OF DEPOSITION OF CUSTODIAN OF RECORDS FOR THE SOUTHERN NEVADA HEATH DISTRICT (PREPARED BY ASSISTANT CRYSTAL WILLIAMS) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE OF PROCESS ON THE WITNESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
MD	L320	A104	REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: LAST KNOWN ADDRESS AND PHONE NUMBER FOR CONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM IN PREPARATION FOR EXHIBIT B TO CASE MANAGEMENT ORDER RESPONSES.		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	57.00
MD	L320	A104	REVIEW/ANALYZE NEVADA STATE BOARD OF CONTRACTORS WEBSITE RE: LAST KNOWN ADDRESS AND PHONE NUMBER FOR CONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM IN PREPARATION FOR EXHIBIT B TO CASE MANAGEMENT ORDER RESPONSES.		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	57.00
MD	L320	A103	DRAFT/REVISE (CONTINUE AND FINALIZE) EXHIBIT B TO CASE MANAGEMENT RESPONSES RE: SUBCONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM.	0.45	42.75
DMC	L120	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: NO OBJECTION TO CLIENTS' REQUEST TO SPECIAL MASTER HALE FOR 30-DAY EXTENSION TO PROVIDE DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
04/24/2017	MD	L320	A103 DRAFT/REVISE (CONTINUE AND FINALIZE) INSURANCE MATRIX TO BE USED TO CASE MANAGEMENT RESPONSES EXHIBIT C - INSURANCE QUESTIONNAIRE.		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	28.50
04/25/2017	DMC	L120	A104 REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: APPROVAL OF REQUEST FOR THIRTY DAY EXTENSION TO ISSUE CLIENTS' EXPERT DISCLOSURES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75

				Hours	
04/27/2017	MD	L320	A108	COMMUNICATE (OTHER EXTERNAL) PHONE CALL WITH HEATHER FROM SOUTHERN NEVADA HEALTH DISTRICT RE: SUBPOENA DUCES TECUM RECEIVED AND DOCUMENTS NEEDED FROM SEWER LINE BREAK CITATION.	
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	9.50
	MD	L320	A104	REVIEW/ANALYZE AFFIDAVIT OF SERVICE RE: CUSTODIAN OF RECORDS FOR SOUTHERN NEVADA HEALTH DISTRICT TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY.	
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	4.75
04/28/2017	DMC	L120	A104	REVIEW/ANALYZE LIEN DOCUMENTS OBTAINED FROM THE CLARK COUNTY ASSESSOR PURSUANT TO CLIENTS' SUBPOENA RE: POTENTIAL EVIDENCE INVOLVING THE STATUTORY DATE OF SUBSTANTIAL COMPLETION OF THE PROJECT, IN ORDER TO DETERMINE IMPACT ON CLIENTS' DEFENSES TO CLAIMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
					8.75
05/08/2017	JBV	L320	A104	REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM SOUTHERN NEVADA HEALTH DISTRICT, RE: ISSUES PROVIDING PERMITS/RECORDS FOR PROJECT SITE, IN PREPARATION FOR COMPLYING WITH ALL REQUIREMENTS TO OBTAIN ALL REQUESTED DOCUMENTATION.	0.05
					4.75
	JBV	L320	A103	DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO SOUTHERN NEVADA HEALTH DISTRICT, RE: OBTAINING PERMITS/RECORDS FOR THE PROJECT SITE.	0.05
					4.75
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM BERNADETTE TIONGSON (COUNSEL FOR INSULPRO) RE: THE ASSOCIATION'S COUNTERCLAIM AGAINST INSULPRO AND WHETHER BWBO HAS BEEN RETAINED TO DEFEND THE SUBCONTRACTORS ENROLLED IN THE WRAP, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
					8.75
	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM HEATHER ANDERSON-FINTAK (ASSOCIATE GENERAL COUNSEL FOR THE SOUTHERN NEVADA HEALTH DISTRICT) RE: CLIENTS' SUBPOENA DUCES TECUM IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05
					8.75
	DMC	L250	A104	REVIEW/ANALYZE COMMISSIONER'S DECISION ON THE ASSOCIATION'S REQUEST FOR EXEMPTION FROM ARBITRATION AND IMPOSITION OF SANCTIONS FOR LATE FILING OF SAME, IN ORDER TO DETERMINE WHAT OBJECTION OR OTHER RESPONSE IS NECESSARY IN LIGHT OF IMPROPER IMPOSITION OF SANCTIONS ON CLIENT SINCE IT WAS THE ASSOCIATION WHO REQUESTED THE EXEMPTION FROM ARBITRATION	0.05
					8.75
05/09/2017	DMC	L240	A102	RESEARCH LEGAL RESEARCH RE: CURRENT LEGAL	

			Hours	
		AUTHORITY IN SUPPORT OF CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	70.00
DMC	L240	A103 DRAFT/REVISE (BEGIN) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: OPENING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	52.50
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (A) FACTS NOT DISPUTED BY THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	52.50
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(1) THE ALLEGED DEFECTS IN UNIT 300 WERE KNOWN TO THE ASSOCIATION PRIOR TO COMMENCING REPAIRS, HOWEVER THE ASSOCIATION FAILED TO PROVIDE NOTICE PRIOR TO COMMENCING REPAIRS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	70.00
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(2) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED WINDOWS AND FIREBLOCKING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	78.75
DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(3) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED MECHANICAL ROOM PIPING DEFECTS (TIME SPLIT WITH OTHER CLAIM NO./FILE		

				Hours	
			PER CARRIER REQUEST)	0.30	52.50
	DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(4) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED SEWER PROBLEMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.95	166.25
	DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (C) A STAY OF THE LITIGATION WILL NOT CURE THE ASSOCIATION'S NOTICE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	DMC	L240	A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	DMC	L240	A103 DRAFT/REVISE PO REQUEST FOR RECONSIDERATION OF IMPOSITION OF SANCTIONS FOR UNTIMELY FILING OF REQUEST FOR EXEMPTION FROM ARBITRATION GIVEN THAT THE LATE REQUEST WAS FILED BY THE ASSOCIATION, THUS ANY SANCTIONS SHOULD BE IMPOSED ON THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.80	140.00
05/10/2017	PCB	L240	A103 DRAFT/REVISE (FINALIZE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE COUNTER-CLAIM AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON THIRD CLAIM FOR RELIEF RE: ADDITIONAL DISCUSSION OF THE TIMING OF THE WORK PERFORMED BY PLAINTFF'S EXPERTS, THE DISCOVERY OF DEFECTS, THE PROBLEMS ASSOCIATED WITH THE LACK OF NOTICE, AND THE ASSOCIATION'S UTTER FAILURE TO COMPLY WITH CHAPTER 40.	0.20	35.00
	DMC	L250	A104 REVIEW/ANALYZE COMMUNICATION FROM THE DISCOVERY COMMISSIONER RE: CLIENT'S OBJECTION TO DISCOVERY COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
05/12/2017	DMC	L120	A104 REVIEW/ANALYZE AMENDED NOTICE OF TAKING THE DEPOSITION OF THE CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT, PREPARED BY LEGAL ASSISTANT, FOR COMPLETENESS AND ACCURACY		

				Hours	
			AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON THE WITNESS AND ALL COUNSEL (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
05/15/2017	JWS	L120	A104 REVIEW/ANALYZE (BEGIN) CORRESPONDENCE AND NOTES TO ASSIST WITH SUPPLEMENTAL REPORT AND CASE PLANNING SESSION.	0.20	35.00
	JBV	L320	A104 REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE: STATUS OF RECEIVING RECORDS IN RESPONSE TO SUBPOENA DUCES TECUM, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND DISCLOSING PURSUANT TO N.R.C.P. 16.1.	0.05	4.75
	JBV	L320	A104 REVIEW/ANALYZE DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENA DUCES TECUM FROM THE SOUTHERN NEVADA HEALTH DISTRICT, RE: VERIFYING ALL DOCUMENTS ARE LEGIBLE FOR ATTORNEY ANALYSIS.	0.10	9.50
	JBV	L320	A103 DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE: CONFIRMATION OF RECEIPT OF RECORDS IN RESPONSE TO SUBPOENA DUCES TECUM.	0.05	4.75
05/16/2017	DMC	L240	A104 REVIEW/ANALYZE COURT'S MINUTE ORDER RE: CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHAT ACTION IS NECESSARY ON BEHALF OF CLIENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A104 REVIEW/ANALYZE AFFIDAVIT OF JACQUELINE RESZETAR (THE CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT) IN RESPONSE TO CLIENTS' SUBPOENA IN ORDER TO DETERMINE WHAT ACTION OR OTHER RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L350	A104 REVIEW/ANALYZE RENOTICE OF HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
05/17/2017	DMC	L120	A103 DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN PREPARATION FOR ADDITIONAL DISCUSSION REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC	L120	A104 REVIEW/ANALYZE E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: RESPONSE TO BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR		

				Hours	
DMC	L120	A104	SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103	REVIEW/ANALYZE ADDITIONAL E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: ADDITIONAL DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHETHER ANY REPLY OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A104	DRAFT/REVISE REPLY TO E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: ADDITIONAL DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L120	A103	REVIEW/ANALYZE FURTHER E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: FURTHER DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN PREPARATION FOR DRAFTING JOINT REQUEST TO SPECIAL MASTER HALE REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
DMC	L250	A104	DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: JOINT REQUEST ON BEHALF OF OUR CLIENTS' AND THE ASSOCIATION TO CONTINUE THE DEADLINE TO PROVIDE RESPONSES TO CASE MANAGEMENT ORDER WRITTEN DISCOVERY IN LIGHT OF CONTINUANCE OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	26.25
DMC	L120	A104	REVIEW/ANALYZE COURT ORDER FROM JUDGE SUSAN JOHNSON ON BEHALF OF DISCOVERY COMMISSIONER SUSTAINING BWBO'S OBJECTION TO SANCTIONS AGAINST BWBO COUNSEL FOR THE ASSOCIATION'S UNTIMELY FILING OF A REQUEST FOR EXEMPTION FROM ARBITRATION, AND IMPOSING SANCTIONS AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
JBV	L120	A109	REVIEW/ANALYZE CLIENTS' NOTICE VACATING THE DEPOSITION OF CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
			APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL [REDACTED]		

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			Hours	
	JWS	L310 A109	0.15	14.25
			0.15	26.25
05/18/2017	DMC	L120 A104		
		REVIEW/ANALYZE DOCUMENTS OBTAINED FROM THE SOUTHERN NEVADA HEALTH DISTRICT IN RESPONSE TO CLIENTS' SUBPOENA DUCES TECUM RE: ALLEGED SEWER LINE FAILURE IN ORDER TO DETERMINE POTENTIAL IMPACT ON CLIENTS' DEFENSE TO SEWER LINE DEFECT CLAIM FOR FUTURE SUMMARY JUDGMENT MOTION THAT THE CLAIM IS TIME BARRED BY THE STATUTE OF LIMITATIONS (46 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	70.00
	DMC	L120 A103		
		DRAFT/REVISE SUMMARY OF ATTORNEY ANALYSIS OF DOCUMENTS OBTAINED FROM THE SOUTHERN NEVADA HEALTH DISTRICT IN RESPONSE TO CLIENTS' SUBPOENA DUCES TECUM FOR FUTURE USE IN THE COURSE OF DISCOVERY AND DEVELOPMENT OF DEFENSE AND DISCOVERY STRATEGIES, INCLUDING FUTURE SUMMARY JUDGMENT MOTION THAT THE CLAIM IS TIME BARRED BY THE STATUTE OF LIMITATIONS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.55	96.25
05/19/2017	DMC	L230 A104		
		REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: SPECIAL MASTER HEARING REGARDING DISCOVERY STATUS AND DISCOVERY SCHEDULING, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
05/20/2017	RAB	L110 A104		
		REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4525 DEAN MARTIN DRIVE IN ORDER TO ASSIST THE ATTORNEY WITH HER ANALYSIS AND CHAPTER 40 CORRESPONDENCES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
	RAB	L110 A104		
		REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4525 DEAN MARTIN DRIVE IN ORDER TO ASSIST THE ATTORNEY WITH HER ANALYSIS AND CHAPTER 40 CORRESPONDENCES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	33.25
05/22/2017	JWS	L120 A103		
		DRAFT/REVISE (BEGIN) SUMMARY RE: PROCEDURAL POSTURE AND CASE DEVELOPMENTS ASSIST WITH FURTHER HANDLING.	0.10	17.50

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				Hours	
05/31/2017	PCB	L120	A104 REVIEW/ANALYZE CURRENT STATUS OF PLAINTIFF'S CLAIMS [REDACTED]		
			(TIME SPLIT WITH OTHER FILE IN SAME CASE AS PER CARRIER DIRECTIVE).	0.20	35.00
			For Current Services Rendered	33.78	4,945.83
			Total Non-billable Hours	0.70	

		Recapitulation			
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>	
Peter C. Brown	PARTNER	0.95	\$178.16	\$169.25	
Jeffrey W. Saab	ASSOCIATE	0.45	175.00	78.75	
Jennifer Vela	PARALEGAL	0.45	95.00	42.75	
Darlene M. Cartier	ASSOCIATE	20.83	170.86	3,559.08	
Rachel A. Bounds	PARALEGAL	0.85	106.76	90.75	
Rochelle A. Harding-Roed	ASSOCIATE	0.45	165.00	74.25	
Michelle Dowling	PARALEGAL	9.80	95.00	931.00	

Expenses

03/02/2017	L100	E109	LOCAL TRAVEL (8799) DARLENE M. CARTIER (TO AND FROM SPECIAL MASTER HEARING) (30 MILES AT 0.535/MILE- SPIT WITH OTHER CLAIM 558)	8.03
03/02/2017	L100	E109	LOCAL TRAVEL (8799) DARLENE M. CARTIER (TO AND FROM SPECIAL MASTER HEARING) (30 MILES AT 0.535/MILE- SPIT WITH OTHER CLAIM 558)	4.01
03/20/2017	L100	E112	WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S, AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)	104.75
03/20/2017	L100	E112	WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S, AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)	52.37
03/30/2017	L100	E102	OUTSIDE PRINTING (CLARK COUNTY'S RECORDERS OFFICE DOCUMENTS) (SPLIT BETWEEN 1287.551/558 AND 1246.005)	5.52
03/30/2017	L100	E123	OTHER PROFESSIONALS (2407) PAUL A. ACKER (DOCUMENTS	

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PANORAMA TOWER II

			FROM CLARK COUNTY RECORDER'S OFFICE)	
03/30/2017	L100	E102	OUTSIDE PRINTING (CLARK COUNTY'S RECORDERS OFFICE DOCUMENTS) (SPLIT BETWEEN 1287.551/558 AND 1246.005)	2.75
03/30/2017	L100	E123	OTHER PROFESSIONALS (2407) PAUL A. ACKER (DOCUMENTS FROM CLARK COUNTY RECORDER'S OFFICE)	2.07
03/31/2017	L100	E101	REPRODUCTION COSTS FOR MARCH 2017 (800 PAGES AT .08/PAGE)	32.00
04/04/2017	L100	E112	WIZ-NET (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)	1.75
04/04/2017	L100	E112	WIZ-NET (STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)	1.75
04/30/2017	L100	E101	REPRODUCTION COSTS FOR APRIL 2017 (209 PAGES AT .08/PAGE)	8.36
05/01/2017	L100	E113	SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010107 SUBPOENA DUCES TECUM & NOTICE - SOUTHERN NEVADA HEALTH DISTRICT, LAS VEGAS / SERVICES RENDERED ON 4/24/17)(SPLIT WITH 1287.551)	30.93
05/01/2017	L100	E113	SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010107 SUBPOENA DUCES TECUM & NOTICE - SOUTHERN NEVADA HEALTH DISTRICT, LAS VEGAS / SERVICES RENDERED ON 4/24/17)(SPLIT WITH 1287.558)	15.47
05/10/2017	L100	E112	WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND IN SUPPORT OF M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)	1.75
05/16/2017	L100	E112	ODYSSEY (RE-NOTICE OF HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S, PANORAMA TOWERS I, MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR	

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PANORAMA TOWER II

SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT
PANORAMA TOWER CONDOMINIUM UNIT OWNERS'
ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER
DEFENDANTS LAURENT HALLIER'S PANORAMA TOWERS I, LLC'S.
PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN
CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON
THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR
DECLARATORY RELIEF)

05/31/2017	L100	E101	REPRODUCTION COSTS FOR MAY 2017 (9 PAGES AT .08/PAGE)	1.75
05/31/2017	L100	E101	REPRODUCTION COSTS FOR MAY 2017 (1194 PAGES AT .08/PAGE)	0.72
				47.76
			Total Expenses	321.74
			Total Current Work	5,267.57
			Previous Balance	\$20,795.71

Payments

04/18/2017			PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616734 / STMT #7)	-9,050.86
04/20/2017			PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616736 / STMT #6)	-5,726.89
04/20/2017			PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616743 / STMT #5)	-7,146.72
			Total Payments	-21,924.47
			Balance Due	<u>\$4,138.81</u>

Split Billing Summary

	<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Total</u>
CHUBB INSURANCE - Panorama Tower I	4,523.42	171.82	0.00	4,695.24
ESIS Dallas AGL Claims (2) - Panorama Tower II	4,523.33	171.79	0.00	4,695.12
	9,046.75	343.61	0.00	9,390.36

Task Code Recapitulation

	<u>Fees</u>	<u>Expenses</u>
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	0.00	321.74
L110 FACT INVESTIGATION/DEVELOPMENT	81.25	0.00
L120 ANALYSIS/STRATEGY	1325.84	0.00
L160 SETTLEMENT/NON-BINDING ADR	66.00	0.00
L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	43.75	0.00
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	1,516.84	321.74
L210 PLEADINGS	117.50	0.00
L230 COURT MANDATED CONFERENCES	311.74	0.00
L240 DISPOSITIVE MOTIONS	1935.00	0.00
L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS	60.75	0.00
L200 PRE-TRIAL PLEADINGS AND MOTIONS	2,424.99	0.00
L310 WRITTEN DISCOVERY	26.25	0.00

ESIS Dallas AGL Claims

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PANORAMA TOWER II

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May 31, 2017
Account No: 1287-5581V
Statement No: 8

		<u>Fees</u>	<u>Expenses</u>
L320	DOCUMENT PRODUCTION	969.00	0.00
L350	DISCOVERY MOTIONS	8.75	0.00
L300	DISCOVERY	1,004.00	0.00

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number
on all payments.

BREMER, WHYTE, BROWN & O'MEARA, LLP
20320 S.W. BIRCH STREET
SECOND FLOOR
NEWPORT BEACH, CA 92660
(949) 221-1000

TAX ID # 33-0747275

CHUBB INSURANCE
525 W. MONROE STREET
CHICAGO IL 60661

Attn: Jeff Ganzer

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PANORAMA TOWER I
~~~SEE NOTES~~~

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March 03, 2017  
Account No: 1287-5511M  
Statement No: 9

|            |     |      |      | <u>Fees</u>                                                                                                                                                                                                                                                                            | Hours | Amount |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| 09/02/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM CAIRO PERSON OF JAMS (MEDIATOR) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION, INCLUDING SUBMISSION OF BRIEFS, IN PREPARATION FOR STATUS REPORT TO CLIENT AND CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO ALL SUBCONTRACTOR COUNSEL RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                             | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO MARTIN LITTLE (COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                            | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO JEFF GANZER (CARRIER) RE: CASE STATUS AND STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF SETTLEMENT DEMAND FROM THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                 | 0.05  | 8.25   |
|            | DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE STATUS AND STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF SETTLEMENT DEMAND FROM THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                      | 0.05  | 8.25   |
| 09/03/2016 | PCB | L210 | A103 | DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF MOTION RE: ADDITIONAL ALLEGATIONS PERTAINING TO THE CHAPTER 40 PRE-LITIGATION PROCESS THAT WAS NOT FOLLOWED APPROPRIATELY BY THE HOA. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                            | 0.20  | 37.00  |
| 09/04/2016 | PCB | L120 | A103 | DRAFT/REVISE EMAIL TO JEFF GANZER (CHUBB) RE: [REDACTED]                                                                                                                                                                                                                               |       |        |

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                  | Hours | Amount |
|------------|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                                                       | 0.05  | 9.25   |
| 09/06/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CAIRO PETERSON OF JAMS (MEDIATOR) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                | 0.05  | 8.25   |
|            | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:                                                                                                                                                                                                                                                                                                                  |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                                                       | 0.05  | 8.25   |
|            | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: PRELIMINARY                                                                                                                                                                                                                                                                                                           |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                                                       | 0.05  | 8.25   |
| 09/12/2016 | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE IN ANOTHER MATTER) RE: NO RESPONSE FROM OLD CASTLE TO CLIENTS' CHAPTER 40 NOTICE AND REQUEST THAT SHE PLACE OLD CASTLE'S INSURANCE CARRIER ON NOTICE OF THE CLAIM AS A PROFESSIONAL COURTESY AND CONTACT OLD CASTLE REGARDING SAME IN PREPARATION FOR UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
|            | DMC | L160 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CARRIER) RE:                                                                                                                                                                                                                                                                                                                                                   |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                                                       | 0.15  | 24.75  |
|            | DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE IN ANOTHER MATTER) RE: HER TENDER OF THIS CLAIM TO OLD CASTLE'S INSURANCE CARRIER, HER RETENTION TO REPRESENT OLD CASTLE IN THIS CASE AND REGARDING THE UPCOMING CHAPTER 40 MEDIATION IN PREPARATION FOR REPLY E-MAIL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                  | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE REPLY TO E-MAIL FROM MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE) WITH COPY TO ROBERT THOMPSON (COUNSEL FOR OLD CASTLE) RE: ADDITIONAL DISCUSSION INVOLVING STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                          | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE:                                                                                                                                                                                                                                                                                                                                                              |       |        |

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~~~SEE NOTES~~~

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A103 | DRAFT/REVISE FORM CORRESPONDENCE TO ALL SUBCONTRACTORS BWBO PLACED ON NOTICE OF THE ASSOCIATION'S CHAPTER 40 CLAIM REGARDING THE UPCOMING MEDIATION IN PREPARATION (INDIVIDUAL LETTERS TO EACH SUBCONTRACTOR TO BE PREPARED BY THE SECRETARY). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| 09/13/2016 | DMC | L160 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: INFORMATION HE REQUESTS REGARDING THE UPCOMING CHAPTER 40 MEDIATION INCLUDING WHETHER WE HAVE OBTAINED ANY DOCUMENTS OR INFORMATION REGARDING THE ASSOCIATION'S CLAIMS OR HIS CLIENT'S WORK IMPLICATED IN THE CLAIMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH ASHLEY ALLARD (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE (BEGIN) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.65 | 107.25 |

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PANORAMA TOWER I
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|            |      |      |      |                                                                                                                                                                                                                                                | Hours | Amount |
|------------|------|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |      |      |      | (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                    | 0.30  | 49.50  |
| DMC        | L160 | A103 |      | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                                                                          |       |        |
|            |      |      |      | [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                         | 0.55  | 90.75  |
| DMC        | L160 | A103 |      | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                                                                          |       |        |
|            |      |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                          | 0.15  | 24.75  |
| DMC        | L160 | A103 |      | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                                                                          |       |        |
|            |      |      |      | [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                         | 0.70  | 115.50 |
| DMC        | L160 | A103 |      | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                                                                          |       |        |
|            |      |      |      | [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                         | 0.20  | 33.00  |
| DMC        | L160 | A103 |      | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                                                                          |       |        |
|            |      |      |      | [REDACTED] (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                         | 0.05  | 8.25   |
| DMC        | L160 | A104 |      | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS FORTHCOMING DETERMINATION AS TO WHETHER CULLIGAN WILL BE PARTICIPATING IN THE UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
| DMC        | L160 | A104 |      | REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM EDEN WATERS OF MKA (CLIENT'S ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                                   |       |        |
|            |      |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                          | 0.10  | 16.50  |
| 09/14/2016 | RAB  | L320 | A104 | REVIEW/ANALYZE CERTIFICATE OF OCCUPANCIES, RE: PERMIT NUMBERS AND ADDRESS OF 2 BUILDING IN PREPARATION FOR CORRESPONDING WITH THE CLARK COUNTY BUILDING DEPARTMENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                 | 0.10  | 9.50   |
|            | RAB  | L320 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: CERTIFICATES OF                                                                                                                                                    |       |        |



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| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | COMPLETION AND FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 9.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE REVIEW OCIP ENROLLMENT LIST AND OTHER NAMED RESPONDENTS THE ASSOCIATION SERVED WITH CHAPTER 40 NOTICES TO DETERMINE WHICH RESPONDENTS ARE ENROLLED IN THE OCIP AND RELEASED FOR PRIOR CLAIMS AND THOSE THAT ARE NOT, IN PREPARATION FOR UPCOMING CHAPTER 40 MEDIATION AND TO ANALYZE POTENTIAL THIRD-PARTY ACTION AGAINST NON-ENROLLED SUBCONTRACTORS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 09/15/2016 | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT EMP CONSULTANTS, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| | RAB | L130 | A103 | DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| | DMC | L150 | A103 | DRAFT/REVISE PHASE I LITIGATION BUDGET PURSUANT TO REQUEST BY CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| | PCB | L120 | A104 | REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION [REDACTED] (TIME SPLIT WITH FILE #1287.558 - "PANORAMA TOWER II"). | 0.20 | 37.00 |
| 09/16/2016 | RAB | L140 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENTS RECORDS DEPARTMENT, RE: FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 9.50 |
| | RAB | L140 | A103 | DRAFT/REVISE MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |

| | | | | Hours | Amount |
|------------|------|------|--|-------|--------|
| | | | CARRIER REQUEST) | 0.05 | 4.75 |
| RAB | L140 | A104 | REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S EXPERT [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| RAB | L140 | A104 | REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT MADSEN, KNEPPERS & ASSOCIATES, INC., RE [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| RAB | L140 | A103 | DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| 09/19/2016 | PCB | L120 | A101 PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558). | 0.10 | 18.50 |
| PCB | L250 | A103 | DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER II" - 1287.558). | 0.40 | 74.00 |
| PCB | L160 | A101 | PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558) | 0.50 | 92.50 |
| DMC | L160 | A104 | REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: STRATEGIES FOR UPCOMING CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L160 | A103 | DRAFT/REVISE SEPARATE CORRESPONDENCE TO INSULPRO PROJECTS, FLIPPINS TRENCHING, BOMBARD MECHANICAL, FORD CONTRACTING AND SIERRA GLASS RE: STRATEGIES RELATING TO UPCOMING CHAPTER | | |

| | | | | | Hours | Amount |
|------------|-----|------|------|--|-------|--------|
| | | | | 40 MEDIATION, IN PREPARATION FOR SERVICE TO PARTIES (5 LETTERS). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A103 | DRAFT/REVISE SEPARATE CORRESPONDENCE TO OLD CASTLE, CULLIGAN, VICTAULIC AND CENTRO RE: DEMAND FOR ATTENDANCE AT UPCOMING CHAPTER 40 MEDIATION, IN PREPARATION FOR SERVICE TO PARTIES (4 LETTERS). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A103 | DRAFT/REVISE CORRESPONDENCE TO BRUCE EDWARDS (MEDIATOR) RE: OBJECTION TO THE ASSOCIATION'S CHAPTER 40 NOTICE TO FLIPPIN'S TRENCHING AND SOUTHERN NEVADA PAVING AND DEMAND THAT THEY BE EXCUSED FROM THE UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND DEMAND FOR ANY DOCUMENTATION RELATING TO CULLIGAN'S IMPLICATION IN THE DEFECT CLAIMS, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS DEMAND FOR ANY DOCUMENTATION RELATING TO CULLIGAN'S IMPLICATION IN THE DEFECT CLAIMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING UPCOMING CHAPTER 40 MEDIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY ON BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 09/21/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558) (NO TRAVEL TIME INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE). | 0.60 | 111.00 |
| | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A109 | APPEAR FOR/ATTEND MEETING WITH SHANE STREAM OF HOLO DISCOVERY AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]
[REDACTED]
[REDACTED] ATTENDANCE BY DMC AND PCB AUTHORIZED BY | | |

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|            |      |      |                                                                                                                                                                                                                                   | Hours | Amount |
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|            |      |      | CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                               | 0.50  | 82.50  |
| DMC        | L160 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM CAIRO PERSON OF JAMS ON BEHALF OF BRUCE EDWARDS (MEDIATOR) RE: REVISED STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
| DMC        | L160 | A103 | DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]                                                                                                                                                                |       |        |
|            |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                        | 0.05  | 8.25   |
| DMC        | L160 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM ASHLEY ALLARD OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                     |       |        |
|            |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                        | 0.15  | 24.75  |
| DMC        | L160 | A104 | REVIEW/ANALYZE PRIOR EXPERT REPORT BY CHRIS ALLEN (PLAINITFF'S ARCHITECTURAL EXPERT) IN PRIOR LITIGATION [REDACTED]                                                                                                               |       |        |
|            |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                        | 0.15  | 24.75  |
| DMC        | L160 | A103 | DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]                                                                                                                                                                |       |        |
|            |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                        | 0.05  | 8.25   |
| 09/22/2016 | PCB  | L120 | A101 PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]                                                                                                                                                         |       |        |
|            |      |      | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                                                                                                                                                       | 0.40  | 74.00  |
| RAB        | L320 | A104 | REVIEW/ANALYZE DOCUMENTS FOR UPCOMING CHAPTER 40 MEDIATION, RE: [REDACTED]                                                                                                                                                        |       |        |
|            |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                        | 0.10  | 9.50   |
| RAB        | L320 | A103 | DRAFT/REVISE EMAIL TO SHANE FROM HOLO DISCOVERY                                                                                                                                                                                   |       |        |

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| | | | | SOLUTIONS, RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 4.75 |
| 09/23/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (34 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 09/24/2016 | DMC | L120 | A109 | APPEAR FOR/ATTEND WITH SHANE GODFREY (AUDIO VISUAL) AND MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 1.05 | 173.25 |
| | DMC | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO PLAINTIFF RE: DEFENSE ANALYSIS OF EVIDENCE IN SUPPORT OF ARGUMENTS THAT THE ASSOCIATIONS NEW CLAIMS INVOLVING WINDOWS AND FIRE BLOCKING WERE PREVIOUSLY ALLEGED OR RELATED TO ALLEGATIONS SETTLED IN THE PRIOR LITIGATION, TENDER OF DEFENSE TO THE ASSOCIATION AND DEMAND FOR DEFENSE AND INDEMNITY OF CLAIMS PURSUANT TO THE TERMS OF THE | | |

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|            |     |      |      | PRIOR SETTLEMENT AGREEMENT INCLUDING SPECIFIC LANGUAGE IN SETTLEMENT AGREEMENT IN SUPPORT OF TENDER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                 | 0.40  | 66.00  |
|            | DMC | L120 | A103 | DRAFT/REVISE RECEIPT OF COPY FOR CORRESPONDENCE TO PLAINTIFF RE: HAND DELIVERY BY BWBO COUNSEL OF TENDER OF CLIENTS' DEFENSE TO THE ASSOCIATION AND DEMAND FOR DEFENSE AND INDEMNITY OF CLAIMS PURSUANT TO THE TERMS OF THE PRIOR SETTLEMENT AGREEMENT IN PREPARATION FOR DELIVERY AT UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
|            | PCB | L120 | A101 | PLAN AND PREPARE FOR TODAY'S MEETING WITH CLIENT'S ARCHITECTURAL EXPERT(MKA) AND THE COMPANY PUTTING TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE: [REDACTED]                                                                                                                                                                                                         |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                                                                                                                                                                                                                                                                                          | 0.80  | 148.00 |
|            | PCB | L120 | A109 | APPEAR FOR/ATTEND MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE: [REDACTED]                                                                                                                                                                                                                   |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558) (NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE IT TOOK PLACE AT BWB&O'S OFFICE).                                                                                                                                                                                                            | 1.10  | 203.50 |
| 09/25/2016 | PCB | L120 | A103 | DRAFT/REVISE (BEGIN) MEDIATION "TALKING POINTS" OUTLINE [REDACTED]                                                                                                                                                                                                                                                                                                              |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                                                                                                                                                                                                                                                                                          | 1.10  | 203.50 |
|            | PCB | L160 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE: [REDACTED]                                                                                                                                                                                                                                                                                                             |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558) (NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE).                                                                                                                                                                                                         | 2.10  | 388.50 |
|            | PCB | L160 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE: [REDACTED]                                                                                                                                                                                                                                                                                                             |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558).                                                                                                                                                                                                                                                                                                           | 0.40  | 74.00  |
| 09/26/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR TODAY'S MEDIATION RE: [REDACTED]                                                                                                                                                                                                                                                                                                                |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - PANORAMA TOWER                                                                                                                                                                                                                                                                                                 |       |        |

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| | | | II"). | 0.40 | 74.00 |
| PCB | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II")(NO TRAVEL TIME INCLUDED IN THIS ENTRY). | 2.00 | 370.00 |
| PCB | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II"). | 0.50 | n/c |
| DMC | L160 | A109 | TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.30 | n/c |
| DMC | L160 | A109 | APPEAR FOR/ATTEND CHAPTER 40 MEDIATION (ATTENDANCE BY DMC AND PCB APPROVED BY CARRIER) (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 2.00 | 330.00 |
| DMC | L160 | A109 | RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.40 | n/c |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED] (TIME SPLIT WITH | | |

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Statement No: 9

|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                      | Hours | Amount |
|------------|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |      |      | OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                                                                                                                                                                                                   | 0.05  | 8.25   |
| DMC        | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND<br>RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE:<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                                             | 0.05  | 8.25   |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT FOR<br>DECLARATORY RELIEF RE: ADD BREACH OF CONTRACT<br>CLAIM FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE<br>PURSUANT TO CARRIER'S<br>REQUEST). (TIME SPLIT WITH OTHER CLAIM NO/FILE<br>PURSUANT TO CARRIER'S REQUEST)                                                                                                                                             | 0.50  | 82.50  |
| 09/27/2016 | DMC  | L120 | A104 REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF<br>ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                                            | 0.05  | 8.25   |
| DMC        | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM NICOLE CASTRO<br>OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                                       | 0.05  | 8.25   |
| DMC        | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF<br>ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:<br>[REDACTED]<br>(ADJUSTER FOR PRIOR<br>LITIGATION) (TIME SPLIT WITH OTHER CLAIM NO./FILE<br>PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                         | 0.05  | 8.25   |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE:<br>GENERAL ALLEGATIONS REGARDING THE TERMS OF THE<br>SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION<br>REGARDING THE ASSOCIATION'S AGREEMENT TO DEFEND<br>AND INDEMNIFY CLIENTS REGARDING FUTURE ACTIONS<br>RELATING TO RELEASED CLAIMS (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                       | 0.10  | 16.50  |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE:<br>GENERAL ALLEGATIONS REGARDING THE NEW<br>REQUIREMENTS UNDER AB 125 REGARDING EVIDENCE OF<br>PHYSICAL DAMAGE TO PROPERTY AND<br>THAT CHAPTER 40 NOTICES MUST IDENTIFY IN SPECIFIC<br>DETAIL EACH DEFECT, DAMAGE AND INJURY, INCLUDING THE<br>LOCATION OF THE DEFECT, DAMAGE AND INJURY (TIME SPLIT<br>WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S<br>REQUEST) | 0.40  | 66.00  |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE:<br>GENERAL ALLEGATIONS REGARDING THE CC&RS, INCLUDING<br>UNIT BOUNDARIES, DEFINITION OF COMMON ELEMENTS AND<br>UNIT OWNER<br>MAINTENANCE RESPONSIBILITIES (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                   | 0.40  | 66.00  |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE:                                                                                                                                                                                                                                                                                                                                                                     |       |        |



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| | | | | GENERAL ALLEGATIONS REGARDING THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION RELATING TO THE ASSOCIATION'S OBLIGATIONS TO DEFEND AND INDEMNIFY CLIENTS IN ANY SUBSEQUENT ACTION INVOLVING THE SETTLED AND RELEASE CLAIMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.20 | 33.00 |
| DMC | L210 | A103 | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: FIRST CLAIM FOR RELIEF REGARDING WHETHER THE ASSOCIATION'S CLAIMS ARE ALL TIME BARRED BY AB 125 AND/OR WHETHER THE ASSOCIATION HAS STANDING TO BRING CLAIMS INVOLVING WINDOWS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: THIRD CLAIM FOR RELIEF REGARDING THE ASSOCIATION'S FAILURE TO COMPLY WITH CHAPTER 40 BY NOT SPECIFYING IN DETAIL EACH ALLEGED ALLEGED DEFECT, DAMAGE AND INJURY, INCLUDING THE EXACT LOCATION OF EACH DEFECT DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A FIFTH CLAIM FOR RELIEF FOR BREACH OF CONTRACT FOR THE ASSOCIATION'S BREACH OF THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.30 | 49.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SIXTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO DEFEND CLIENTS REGARDING THE NEWLY ALLEGED CLAIMS THAT WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.50 | 82.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SEVENTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO INDEMNIFY CLIENTS REGARDING THE NEWLY ALLEGED CLAIMS THAT WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.50 | 82.50 |
| DMC | L120 | A104 | | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |

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| DMC | L250 | A103 | DRAFT/REVISE NOTICE OF PRIOR RELATED LITIGATION AND EX PARTE REQUEST FOR ASSIGNMENT TO THE HONORABLE SUSAN JOHNSON (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)(NOTICE/REQUEST APPROVED BY CARRIER)                           | 0.90  | 148.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                                                                                                         |       |        |
|     |      |      | [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                        | 0.05  | 8.25   |
| DMC | L250 | A104 | REVIEW/ANALYZE INITIAL APPEARANCE FEE DISCLOSURE FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05  | 8.25   |
| DMC | L250 | A104 | REVIEW/ANALYZE CLIENTS' DEMAND FOR JURY TRIAL FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)    | 0.05  | 8.25   |
| DMC | L250 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                                                                                               |       |        |
|     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                       | 0.20  | 33.00  |
| DMC | L250 | A103 | DRAFT/REVISE DETAILED RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]                                                                                                                                     |       |        |
|     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                       | 0.40  | 66.00  |
| RAB | L320 | A104 | REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40 MEDIATION, RE: POWER POINT PRESENTATION INFORMATION IN PREPARATION SENDING TO PARTIES IN THE CASE AS PER REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)  | 0.15  | 14.25  |
| PCB | L210 | A103 | DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF ACTION RE: ADDITIONAL ALLEGATIONS WITH REGARD TO THE SETTLEMENT AGREEMENT FROM THE ORIGINAL CASE (TIME SPLIT WITH OTHER                                                                                    |       |        |
|     |      |      | FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II").                                                                                                                                                                                                  | 0.10  | 18.50  |
| DMC | L120 | A103 | DRAFT/REVISE FOLLOW UP E-MAIL TO NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]                                                                                                                                        |       |        |
|     |      |      | [REDACTED] (TIME                                                                                                                                                                                                                                      |       |        |

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| | | | | SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| 09/28/2016 | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO ALL COUNSEL, RE: INFORMATION RELATING TO THE LINK OT THE POWER POINT PRESENTATION. (TIME IS SPLIT WITH THE OTHER FILE 1287.558) | 0.10 | 9.50 |
| | RAB | L320 | A103 | DRAFT/REVISE (CONTINUE) MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: ADDING ADDITIONAL INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME IS SPLIT WITH THE OTHER FILE 1287.558) | 0.10 | 9.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE REVISE INITIAL LITIGATION BUDGET TO INCLUDE ADDITIONAL MOTION PRACTICE PURSUANT TO REQUEST BY CARRIER AT THE CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L160 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR OLD CASTLE) RE: OUTCOME OF CHAPTER 40 MEDIATION, INCLUDING WHETHER THE ASSOCIATION MADE ANY SETTLEMENT DEMAND AND WHETHER ANY SETTLEMENT WAS REACHED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM AINE MADDEN OF | | |

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | ENDURANCE (EXCESS CARRIER) RE: [REDACTED]
[REDACTED] (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 09/29/2016 | DMC | L120 | A104 | REVIEW/ANALYZE SUMMONS TO THE ASSOCIATION FOR
COMPLETENESS AND ACCURACY AND APPROVE AND
EXECUTE SAME AS COUNSEL ON BEHALF OF CLIENTS, IN
PREPARATION FOR SERVICE ON THE ASSOCIATION WITH
CLIENT'S COMPLAINT (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS
(CARRIER) RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN
BRYDON OF ESIS (CARRIER) RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.05 | 8.25 |
| 10/03/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL
FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING
THE OUTCOME OF THE CHAPTER 40 MEDIATION (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON
(COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION
REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION
INCLUDING
SETTLEMENT DISCUSSIONS WITH THE ASSOCIATION (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON
(COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION
REGARDING SETTLEMENT DISCUSSIONS THAT TOOK PLACE
AT THE RECENT
CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 10/07/2016 | PCB | L190 | A107 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON
(COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION
REGARDING SETTLEMENT DISCUSSIONS THAT TOOK PLACE
AT THE RECENT
CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.05 | 9.25 |
| 10/17/2016 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM MKA (CLIENTS'
ARCHITECTURAL EXPERT) RE: [REDACTED] | | |

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|            |     |      |      |                                                                                                                                                                                                                             | Hours | Amount |
|------------|-----|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                  | 0.05  | 8.25   |
|            | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                                 |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                  | 0.05  | 8.25   |
| 10/21/2016 | RAB | L340 | A104 | REVIEW/ANALYZE POWER POINT PRESENTATION DOCUMENTS, RE: MEDIATION DOCUMENTS IN PREPARATION FOR CORRESPONDING WITH PLAINTIFF'S COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                            | 0.10  | 9.50   |
|            | RAB | L340 | A104 | REVIEW/ANALYZE EMAIL TO PLAINTIFF'S COUNSEL FRANCIS LYNCH, RE: POWER POINT PRESENTATION DOCUMENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                               | 0.10  | 9.50   |
| 10/26/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE: [REDACTED]                                                                                                                                                             |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                  | 0.05  | 8.25   |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER (CARRIER) RE: [REDACTED]                                                                                                                                                   |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                  | 0.05  | 8.25   |
| 11/08/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                                  |       |        |
|            |     |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                  | 0.05  | 8.25   |
| 11/10/2016 | RAB | L320 | A104 | REVIEW/ANALYZE OUR CLIENT'S PLEADINGS, RE: E-FILED COMPLAINT IN PREPARATION FOR CORRESPONDING WITH DEFENDANT OLDCASTLE BUILDING ENVELOPE FKA TEXAS WALL SYSTEMS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10  | 9.50   |
|            | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO DEFENDANTS OLDCASTLE BUILDING ENVELOPE FKA TEXAS WALL SYSTEMS, RE: INFORMATION RELATING TO THE COMPLAINT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                  | 0.10  | 9.50   |
| 11/22/2016 | PCB | L210 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF HIS MEETING WITH THE BOARD AND THE TIMING FOR THE RESPONSE TO THE                                                                            |       |        |

## CHUBB INSURANCE

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Statement No: 9

| | | | | | Hours | Amount |
|------------|-------------------------------|------|------|--|-------|----------|
| 11/23/2016 | PCB | L190 | A107 | TENDER OF DEFENSE.
(TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II - 1287.551) | 0.10 | 18.50 |
| | | | | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR PLAINTIFF RE: CONTINUED DISCUSSION ABOUT THE TIMING FOR HIS CLIENT'S RESPONSE TO THE TENDER OF DEFENSE, THE TIMING FOR HIS CLIENT'S TENDER OF THE DEC RELIEF ACTION TO THE HOA'S CARRIER, AND THE TIMING OF HIS CLIENT'S FILING OF A RESPONSIVE PLEADING (TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II -1287.551). | 0.20 | 37.00 |
| | PCB | L190 | A103 | DRAFT/REVISE EMAIL TO COUNSEL FOR THE HOA RE: CONFIRMATION OF AGREEMENTS REACHED DURING THIS MORNING'S PHONE CONVERSATION. (TIME SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II - 1287.551). | 0.10 | 18.50 |
| | For Current Services Rendered | | | | 29.00 | 4,894.50 |
| | Total Non-billable Hours | | | | 1.20 | |

Recapitulation

| Timekeeper | Title | Hours | Rate | Total |
|--------------------|-----------|-------|----------|------------|
| Peter C. Brown | PARTNER | 10.90 | \$185.00 | \$2,016.50 |
| Darlene M. Cartier | ASSOCIATE | 16.55 | 165.00 | 2,730.75 |
| Rachel A. Bounds | PARALEGAL | 1.55 | 95.00 | 147.25 |

Expenses

| | | | | |
|--------------------|------|------|---|--------------------|
| 09/26/2016 | L100 | E109 | LOCAL TRAVEL (8799) DARLENE M. CARTIER (29.2 MILES AT \$.54/MILE FOR MEDIATION) SPLIT WITH 1287.558 | 7.88 |
| 09/29/2016 | L100 | E112 | WIZ-NET (DEMAND FOR JURY TRIAL) | 1.75 |
| 09/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR SEPTEMBER 2016 (1090 PAGES 0.08/PAGE) | 43.60 |
| 10/11/2016 | L100 | E112 | WIZ-NET (SUMMONS PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION) | 1.75 |
| 10/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR OCTOBER 2016 (12 PAGES 0.08/PAGE) | 0.48 |
| 11/03/2016 | L100 | E123 | OTHER PROFESSIONALS (98118) HOLO DISCOVERY (DEPOSITORY SERVICES) (INVOICE NO. 1457) (SPLIT BETWEEN 1287.551 AND 1287.558) (TRIAL PREPARATION) | 693.75 |
| 11/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR NOVEMBER 2016 (15 PAGES 0.08/PAGE) | 0.60 |
| Total Expenses | | | | 749.81 |
| Total Current Work | | | | 5,644.31 |
| Previous Balance | | | | \$11,381.32 |
| Balance Due | | | | <u>\$17,025.63</u> |

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| Aged Due Amounts |              |              |               |                |             |
|------------------|--------------|--------------|---------------|----------------|-------------|
| <u>0-30</u>      | <u>31-60</u> | <u>61-90</u> | <u>91-120</u> | <u>121-180</u> | <u>181+</u> |
| 17,025.63        | 0.00         | 0.00         | 0.00          | 0.00           | 0.00        |

Task Code Summary

|                                                          | <u>Fees</u> | <u>Expenses</u> |
|----------------------------------------------------------|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 0.00        | 749.81          |
| L120 ANALYSIS/STRATEGY                                   | 1472.75     | 0.00            |
| L130 EXPERTS/CONSULTANTS                                 | 14.25       | 0.00            |
| L140 DOCUMENT/FILE MANAGEMENT                            | 28.50       | 0.00            |
| L150 BUDGETING                                           | 33.00       | 0.00            |
| L160 SETTLEMENT/NON-BINDING ADR                          | 2253.25     | 0.00            |
| L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 64.75       | 0.00            |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 3,866.50    | 749.81          |
| L210 PLEADINGS                                           | 585.50      | 0.00            |
| L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS               | 338.00      | 0.00            |
| L200 PRE-TRIAL PLEADINGS AND MOTIONS                     | 923.50      | 0.00            |
| L320 DOCUMENT PRODUCTION                                 | 85.50       | 0.00            |
| L340 EXPERT DISCOVERY                                    | 19.00       | 0.00            |
| L300 DISCOVERY                                           | 104.50      | 0.00            |

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

0331

AA3040

BREMER, WHYTE, BROWN & O'MEARA, LLP  
 20320 S.W. BIRCH STREET  
 SECOND FLOOR  
 NEWPORT BEACH, CA 92660  
 (949) 221-1000

TAX ID # 33-0747275

ESIS Dallas AGL Claims  
 P.O. Box 5127  
 Scranton, PA 18505  
 USA

Attn: Sherilyn Brydon

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 Statement No: 9

|            |     |      |      | <u>Fees</u>                                                                                                                                                                                                                                                                                |       |        |
|------------|-----|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      |                                                                                                                                                                                                                                                                                            | Hours |        |
| 06/13/2017 | JBV | L350 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH FORMER COUNSEL, DARLENE CARTIER, RE: ISSUES WITH COMMISSIONER'S DECISION TO SANCTION CLIENT MISTAKENLY, IN PREPARATION FOR ENSURING ISSUES ARE RESOLVED AND CORRECT PARTY IS SANCTIONED.                                                          | 0.10  | 9.50   |
|            | JBV | L350 | A104 | REVIEW/ANALYZE ORDER REGARDING OBJECTION TO ADR COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL FOR THE HOA, RE: ENSURING PROPER COUNSEL IS SANCTIONED AND PAYS FEES.                                                                                       | 0.05  | 4.75   |
|            | JBV | L350 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM PRIOR COUNSEL, DARLENE CARTIER TO ADR COMMISSIONER, RE: PROVIDING THE ORDER RE: OBJECTION TO ADR COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL, IN PREPARATION FOR ENSURING COUNSEL FOR HOA IS HELD RESPONSIBLE. | 0.05  | 4.75   |
| 06/19/2017 | JWS | L230 | A101 | PLAN AND PREPARE FOR (BEGIN) HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT. REVIEW, ANALYZE AND OUTLINE MOVING PAPERS WITH EXHIBITS(APPROXIMATELY 200 PAGES) [REDACTED]                                                                                                                 |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH 1287.551)                                                                                                                                                                                                                                                      | 1.30  | 227.50 |
|            | JWS | L230 | A104 | REVIEW/ANALYZE (BEGIN) LEGAL RESEARCH, CASES CITED IN SUPPORT/AGAINST MOTION FOR SUMMARY JUDGMENT, GENERAL HOLDINGS/APPLICABILITY, AND FACTUAL SCENARIOS TO ASSIST WITH FORMULATION OF ORAL ARGUMENTS. TIME SPLIT WITH 1287.551                                                            | 0.80  | 140.00 |
|            | JWS | L230 | A101 | PLAN AND PREPARE FOR (CONTINUE) ORAL ARGUMENTS ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT, FORMULATION OF ADDITIONAL ARGUMENTS IN SUPPORT OF RELIEF SOUGHT [REDACTED]                                                                                                                        |       |        |
|            |     |      |      | [REDACTED] TIME SPLIT WITH 1287.551.                                                                                                                                                                                                                                                       | 0.80  | 140.00 |
|            | PCB | L240 | A101 | PLAN AND PREPARE (BEGIN) FOR TOMORROW'S HEARING ON MOTION FOR SUMMARY JUDGMENT AND MOTION FOR                                                                                                                                                                                              |       |        |



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|                                                                                 |      |      |                                                                                                                                                                                                                                                                 | Hours                                                                                                                                   |        |  |
|---------------------------------------------------------------------------------|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|--------|--|
| PARTIAL SUMMARY JUDGMENT RE: [REDACTED]                                         |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| (TIME SPLIT WITH OTHER FILE - BWB&O File #1287.558 - THAT DEALS WITH TOWER II). |      |      |                                                                                                                                                                                                                                                                 | 1.10                                                                                                                                    | 192.50 |  |
| PCB                                                                             | L240 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S HEARING ON THE MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE 3RD CAUSE OF ACTION RE: CONTINUE TO DRAFT ORAL ARGUMENT OUTLINE, [REDACTED]                                             |                                                                                                                                         |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II).   |      |      |                                                                                                                                                                                                                                                                 | 0.40                                                                                                                                    | 70.00  |  |
| JWS                                                                             | L230 | A101 | PLAN AND PREPARE FOR (BEGIN) HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT. REVIEW, ANALYZE AND OUTLINE MOVING PAPERS WITH EXHIBITS (APPROXIMATELY 200 PAGES). [REDACTED]                                                                                    |                                                                                                                                         |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| (TIME ALREADY SPLIT WITH 1287.558)                                              |      |      |                                                                                                                                                                                                                                                                 | 0.65                                                                                                                                    | 113.75 |  |
| JWS                                                                             | L230 | A104 | REVIEW/ANALYZE (BEGIN) LEGAL RESEARCH, CASES CITED IN SUPPORT/AGAINST MOTION FOR SUMMARY JUDGMENT, GENERAL HOLDINGS/APPLICABILITY, AND FACTUAL SCENARIOS TO ASSIST WITH FORMULATION OF ORAL ARGUMENTS. (TIME ALREADY SPLIT WITH 1287.558)                       | 0.40                                                                                                                                    | 70.00  |  |
| JWS                                                                             | L230 | A101 | PLAN AND PREPARE FOR (CONTINUE) ORAL ARGUMENTS ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT, FORMULATION OF ADDITIONAL ARGUMENTS IN SUPPORT OF RELIEF SOUGHT [REDACTED]                                                                                             |                                                                                                                                         |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| (TIME ALREADY SPLIT WITH 1287.558)                                              |      |      |                                                                                                                                                                                                                                                                 | 0.45                                                                                                                                    | 78.75  |  |
| 06/20/2017                                                                      | JWS  | L230 | A101                                                                                                                                                                                                                                                            | PLAN AND PREPARE FOR (CONTINUE) HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT, MORE SPECIFICALLY, STATUTORY ARGUMENTS RE: [REDACTED] |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| TIME SPLIT WITH 1287.551                                                        |      |      |                                                                                                                                                                                                                                                                 | 0.30                                                                                                                                    | 52.50  |  |
| JWS                                                                             | L230 | A109 | APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL TIME IN ENTRY. TIME SPLIT WITH 1287.551.                                                                                                                           | 1.30                                                                                                                                    | 227.50 |  |
| JWS                                                                             | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE: [REDACTED]                                                                                                                                                                                                         |                                                                                                                                         |        |  |
| [REDACTED]                                                                      |      |      |                                                                                                                                                                                                                                                                 |                                                                                                                                         |        |  |
| TIME SPLIT WITH 1287.551                                                        |      |      |                                                                                                                                                                                                                                                                 | 0.20                                                                                                                                    | 35.00  |  |
| JWS                                                                             | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE: CASE ACTIVITY UPDATE, HEARING ON MOTION FOR SUMMARY JUDGMENT AND FURTHER HANDLING. TIME SPLIT WITH 1287.551                                                                                                        | 0.10                                                                                                                                    | 17.50  |  |
| JWS                                                                             | L230 | A101 | PLAN AND PREPARE FOR (CONTINUE) HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT, MORE SPECIFICALLY, STATUTORY ARGUMENTS RE: DEFINITION OF UNIT, NOTICE REQUIREMENTS, AND RIGHT TO REPAIR AS RAISED IN THE ASSOCIATION'S OPPOSITION. (TIME SPLIT WITH 1287.558) | 0.15                                                                                                                                    | 26.25  |  |
| JWS                                                                             | L230 | A109 | APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON                                                                                                                                                                                                                     |                                                                                                                                         |        |  |

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PANORAMA TOWER II

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                | Hours |        |
|------------|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL TIME IN ENTRY. (TIME ALREADY SPLIT WITH 1287.558)                                                                                                                                                                                                                                                                                                                                             | 0.65  | 113.75 |
|            | JWS | L230 | A103 | DRAFT/REVISE SUMMARY RE: ORAL ARGUMENTS/COURT'S ANALYSIS ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT. (TIME ALREADY SPLIT BETWEEN 1287.558)                                                                                                                                                                                                                                                                                                       | 0.10  | 17.50  |
|            | JWS | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE: CASE ACTIVITY UPDATE, HEARING ON MOTION FOR SUMMARY JUDGMENT AND FURTHER HANDLING. (TIME SPLIT BETWEEN 1287.558)                                                                                                                                                                                                                                                                                  | 0.05  | 8.75   |
|            | PCB | L240 | A101 | PLAN AND PREPARE (FINAL) FOR TODAY'S HEARING ON MOTION SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT RE: CONTINUE TO GO OVER ALL CASES CITED BY THE HOA, CONTINUE TO DRAFT ORAL ARGUMENT, CONTINUE TO IDENTIFY SPECIFIC SECTIONS OF THE VARIOUS EXHIBITS TO USE DURING ORAL ARGUMENT AND PRACTICE ORAL ARGUMENT (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).                                                    | 1.70  | 297.50 |
|            | PCB | L240 | A109 | APPEAR FOR/ATTEND HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT (NO TRAVEL TIME INCLUDED IN THIS ENTRY; TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.588 - TOWER II).                                                                                                                                                                                                                              | 1.30  | 227.50 |
| 06/21/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM HOA TO THE SPECIAL MASTER RE: PROPOSED STAY OF DISCOVERY/BASIS FOR THE SAME.                                                                                                                                                                                                                                                                                                                                | 0.05  | 8.75   |
| 06/22/2017 | PCB | L120 | A103 | DRAFT/REVISE EMAILS TO CARRIERS RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).                                                                                                                                                                                                                                                                                                 | 0.20  | 35.00  |
|            | JWS | L120 | A103 | DRAFT/REVISE UPDATED SUMMARY TO CARRIER, RE: [REDACTED]<br>[REDACTED]                                                                                                                                                                                                                                                                                                                                                                          | 0.05  | 8.75   |
| 06/23/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE AND RECOMMENDATION AND ORDER FROM THE SPECIAL MASTER HOLDING DISCOVERY IN ABEYANCE IN ORDER TO DETERMINE RELEVANCY AND ENSURE COMPLIANCE.                                                                                                                                                                                                                                                                        | 0.05  | 8.75   |
| 06/26/2017 | JWS | L320 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM OWNER OF SILVERSTAR RE: DOCUMENT SUBPOENA/SCOPE OF WORK AT PROJECT.                                                                                                                                                                                                                                                                                                                                         | 0.05  | 8.75   |
| 06/28/2017 | PCB | L210 | A104 | REVIEW/ANALYZE THE HOA'S REQUEST TO EXTEND THE TIME FOR SERVICE OF THE COUNTER-CLAIM, CALCULATE WHEN THE DEADLINE EXPIRES, CONTACT COUNSEL FOR THE HOA TO DISCUSS THAT THE COUNTER-CLAIM SHOULD HAVE BEEN A THIRD-PARTY CLAIM AS TO THE SUBCONTRACTORS, AND TELL THEM THAT BWB&O CANNOT AGREE TO THE REQUESTED EXTENSION BECAUSE BWB&O DOES NOT REPRESENT THOSE OTHER PARTIES (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.20  | 35.00  |

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5143220827859X-A  
PANORAMA TOWER II

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                       |  | Hours |       |
|------------|-----|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------|-------|
|            | JWS | L210 | A104 | REVIEW/ANALYZE CORRESPONDENCE, NOTES AND COURT MINUTES IN PREPARATION FOR ANTICIPATED EMERGENCY HEARING AT REQUEST OF HOA ON SERVICE OF PLEADINGS.                                                                                                                                                                                                    |  | 0.20  | 35.00 |
| 06/30/2017 | JWS | L210 | A104 | REVIEW/ANALYZE COURT FILINGS RE: DEAN ROOFING, 5 STAR PLUMBING, FLIPPINS TRENCHING, FORD CONTRACTING AND SIERRA GLASS AND MIRROR IN ORDER TO DETERMINE RELEVANCY AND ASSIST WITH FURTHER CASE HANDLING. TIME SPLIT WITH PANORAMA I FILE.                                                                                                              |  | 0.10  | 17.50 |
|            | JWS | L210 | A104 | REVIEW/ANALYZE COURT FILINGS RE: DEAN ROOFING, 5 STAR PLUMBING, FLIPPINS TRENCHING, FORD CONTRACTING AND SIERRA GLASS AND MIRROR IN ORDER TO DETERMINE RELEVANCY AND ASSIST WITH FURTHER CASE HANDLING. TIME SPLIT WITH PANORAMA II FILE.                                                                                                             |  | 0.05  | 8.75  |
| 07/07/2017 | PCB | L210 | A104 | REVIEW/ANALYZE EMAIL FROM THE RISK MANAGER FOR BOMBARD MECHANICAL, ASSESS HOW TO ADDRESS HER QUESTIONS, AND PREPARE EMAIL BACK DISCUSSING THE OVERALL STATUS OF THE CASE AND WHY THE CLAIM AGAINST BOMBARD MIGHT BECOME MOOT (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II).                                            |  | 0.10  | 17.50 |
| 07/09/2017 | PCB | L210 | A103 | DRAFT/REVISE EMAIL TO COUNSEL FOR THE HOA RE: SUGGESTED WAY TO DEAL WITH THE CLAIMS AGAINST THE SUBCONTRACTORS SINCE JUDGE JOHNSON HAS YET TO RULE ON THE MOST RECENT MOTION FOR PARTIAL SUMMARY JUDGMENT/DECLARATORY RELIEF (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II).                                            |  | 0.05  | 8.75  |
| 07/10/2017 | PCB | L190 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH RISK MANAGER FOR BOMBARD MECHANICAL RE: DISCUSSION OF ALL THE ISSUES SURROUNDING THE RECENT MOTION PRACTICE, WHETHER THERE IS A POSSIBILITY THAT THE COURT WILL DISMISS THE CLAIMS PERTAINING TO BOMBARD, POTENTIAL EXPOSURE FOR BOMBARD, AND NOTICE TO PRODUCT MANUFACTURERS.                                      |  | 0.15  | 26.25 |
|            | PCB | L210 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA ON THE REASONS WHY HE SHOULD AGREE TO GIVE EXTENSIONS OF TIME TO THE SUBCONTRACTORS TO RESPOND TO HIS CLIENT'S PLEADING, AND SEND EMAIL TO THE CARRIER CONTACTS AND TO THE RISK MANAGER FOR BOMBARD MECHANICAL INFORMING THEM OF OPPOSING COUNSEL'S AGREEMENT TO THE PROPOSED EXTENSION. |  | 0.10  | 17.50 |
| 07/16/2017 | JWS | L210 | A104 | REVIEW/ANALYZE CORRESPONDENCE/NOTES, AND PROCEDURAL HISTORY IN PREPARATION OF OPPOSITION TO THE ASSOCIATION'S MOTION TO ENLARGE TIME TO SERVE COUNTER-DEFENDANTS. TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER.                                                                                                                |  | 0.40  | 70.00 |
|            | JWS | L210 | A104 | REVIEW/ANALYZE (LIMITED RESEARCH) O STATUTES, CASE LAW CITED IN THE ASSOCIATION'S MOTION TO ENLARGE IN PREPARATION OF THE CLIENT'S OPPOSITION TO THE SAME. TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER.                                                                                                                       |  | 0.35  | 61.25 |
|            | JWS | L210 | A103 | DRAFT/REVISE (BEGIN) AFFIDAVIT OF PETER BROW IN                                                                                                                                                                                                                                                                                                       |  |       |       |

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Hours |        |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | SUPPORT OF CLIENT'S OPPOSITION TO THE ASSOCIATION'S MOTION FOR ENLARGEMENT OF TIME.                                                                                                                                                                                                                                                                                                                                                                                                                      | 0.05  | 8.75   |
|            | JWS | L210 | A103 | DRAFT/REVISE (BEGIN) OPPOSITION TO THE ASSOCIATION'S MOTION TO ENLARGE TIME TO SERVE COUNTER-DEFENDANTS, RE: PROCEDURAL HISTORY, FACTS, LEGAL STANDARDS AND CASE LAW, E.G., NRCP(4) AND SCRIMER, ARGUMENTS AND PRAYER FOR RELIEF. (TIME SPLIT WITH 1287.558 AT REQUEST OF ADJUSTER.)                                                                                                                                                                                                                     | 0.85  | 148.75 |
| 07/17/2017 | JWS | L210 | A103 | DRAFT/REVISE (SUPPLEMENTED) OPPOSITION TO MOTION TO AMEND TO ADDRESS AMENDMENTS TO PLEADINGS, AND CLIENTS' RESERVATION TO OBJECT TO SAME AND ALSO TO CHALLENGE VALIDITY OF COUNTER-CLAIM.                                                                                                                                                                                                                                                                                                                | 0.10  | 17.50  |
|            | PCB | L250 | A103 | DRAFT/REVISE (FINALIZE) OPPOSITION TO MOTION TO ENLARGE TIME TO SERVE COUNTER-CLAIM RE: ADDITIONAL ARGUMENTS DEALING WITH THE INVALIDITY OF THE COUNTER-CLAIM AS TO THE PARTIES THE HOA IS SEEKING TO SERVE WITH THE COUNTER-CLAIM, ADDITIONAL ARGUMENTS AS TO THE LACK OF JUSTIFICATION FOR THE ADDITIONAL TIME BEING REQUESTED, AND ADDITIONAL ARGUMENTS AS TO THE PREJUDICE THAT WILL OCCUR SHOULD THE COURT GRANT THE HOA'S REQUEST (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.40  | 70.00  |
| 07/26/2017 | PCB | L210 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR ONE OF THE SUBCONTRACTORS RE: DISCUSSION OF THE CURRENT STATUS OF THE COURT'S RULING ON THE MOST RECENT ROUND OF MOTION PRACTICE, AND WHETHER HER CLIENT NEEDS TO FILE A RESPONSIVE PLEADING AT THIS TIME TO THE HOA'S PLEADING (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).                                                                                                                                                    | 0.05  | 8.75   |
| 07/27/2017 | JWS | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) ADJUSTER WITH WESTERN NATIONAL X 2 ON BEHALF OF PLUMBING/SEWER SUBCONTRACTOR RE: CASE ACTIVITY, SPLIT WITH TOWER TWO CASE PER ADJUSTER.                                                                                                                                                                                                                                                                                                                                     | 0.15  | 26.25  |
|            | JWS | L210 | A104 | REVIEW/ANALYZE AND OUTLINE HOA'S REPLY TO CLIENT'S OPPOSITION TO MOTION TO ENLARGE SERVICE ON DEFENDANTS. SPLIT WITH TOWER TWO CASE PER ADJUSTER.                                                                                                                                                                                                                                                                                                                                                        | 0.10  | 17.50  |
| 07/31/2017 | JWS | L230 | A101 | PLAN AND PREPARE FOR, ASSIST HANDLING PARTNER WITH PREPRATION FOR HEARING ON THE ASSOCIATIONS MOTION TO SERVE REMAINING PARTIES, INCLUDED REVIEW/IDENTIFCATION OF MATERIAL AND EXHIBITS NEEDED FOR ORAL ARGUMENTS.                                                                                                                                                                                                                                                                                       | 0.15  | 26.25  |
| 08/01/2017 | PCB | L250 | A104 | REVIEW/ANALYZE PLEADINGS RELATED TO THE HOA'S REQUEST TO EXTEND THE TIME TO SERVE THE COUNTER-CLAIM AND OUTLINE ORAL ARGUMENTS TO BE USED DURING HEARING, [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER                                                                                                                                                                                                                                                                                  |       |        |

Panorama Tower II  
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 PANORAMA TOWER II

|            |     |      |      |                                                           | Hours |          |
|------------|-----|------|------|-----------------------------------------------------------|-------|----------|
|            | PCB | L250 | A109 | FILE IN SAME CASE - 1297.558 - TOWER II).                 | 0.40  | 70.00    |
|            |     |      |      | APPEAR FOR/ATTEND HEARING ON HOA'S MOTION TO              |       |          |
|            |     |      |      | EXTEND THE TIME TO SERVE THE COUNTER-CLAIM (TIME          |       |          |
|            |     |      |      | SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II; |       |          |
|            | PCB | L250 | A103 | NO TRAVEL TIME INCLUDED IN THIS ENTRY).                   | 0.70  | 122.50   |
|            |     |      |      | DRAFT/REVISE PROPOSED ORDER DENYING THE HOA'S             |       |          |
|            |     |      |      | MOTION TO ENLARGE TIME (TIME SPLIT WITH OTHER FILE IN     |       |          |
|            |     |      |      | SAME CASE - 1287.558 - TOWER II).                         | 0.05  | 8.75     |
| 08/09/2017 | JWS | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL          |       |          |
|            |     |      |      | FOR THE HOA, MEET AND CONFER RE: PENDING MOTIONS          |       |          |
|            |     |      |      | BEFORE JUDGE, NO RULING TO DATE, IMPLICATIONS, AND        |       |          |
|            |     |      |      | NEED FOR FOLLOW-UP WITH SPECIAL MASTER. TIME SPLIT        |       |          |
|            |     |      |      | WITH TOWER TWO FILE PER ADJUSTER.                         | 0.10  | 17.50    |
|            | JWS | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER             |       |          |
|            |     |      |      | HALE RE: CASE STATUS, PENDING RULING FROM JUDGE, AND      |       |          |
|            |     |      |      | REQUEST TO CONTINUE HEARING.                              | 0.10  | 17.50    |
|            | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE/RESPONSE FROM               |       |          |
|            |     |      |      | SPECIAL MASTER HALE RE: STATUS UPDATE/REQUEST TO          |       |          |
|            |     |      |      | CONTINUE HEARING.                                         | 0.05  | 8.75     |
| 08/10/2017 | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL                |       |          |
|            |     |      |      | MASTER HALE RE: UPCOMING STATUS CHECK HEARING,            |       |          |
|            |     |      |      | NEED TO MOVE FORWARD WITH THE SAME.                       | 0.05  | 8.75     |
|            | JWS | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER             |       |          |
|            |     |      |      | HALE, MEET AND CONFER RE: BASIS FOR CONTINUATION OF       |       |          |
|            |     |      |      | HEARING BASED ON PROCEDURAL POSTURE OF CASE.              | 0.10  | 17.50    |
|            | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL                |       |          |
|            |     |      |      | MASTER HALE RE: APPROVAL OF REQUEST TO CONTINUE           |       |          |
|            |     |      |      | HEARING BASED ON PROCEDURAL POSTURE OF CASE.              | 0.05  | 8.75     |
| 08/24/2017 | JWS | L210 | A104 | REVIEW/ANALYZE (BEGIN) ASSOCIATIONS MOTION TO             |       |          |
|            |     |      |      | ENLARGE TIME TO SERVE/AMEND PLEADINGS WITH BACK UP,       |       |          |
|            |     |      |      | 59 PAGES TOTAL IN ORDER TO DETERMINE FURTHER              |       |          |
|            |     |      |      | COURSE OF ACTION, AND POSSIBLE OPPOSITION.                | 0.20  | 35.00    |
|            |     |      |      | For Current Services Rendered                             | 17.70 | 3,081.50 |

## Recapitulation

| Timekeeper      | Title     | Hours | Rate     | Total      |
|-----------------|-----------|-------|----------|------------|
| Peter C. Brown  | PARTNER   | 6.90  | \$175.00 | \$1,207.50 |
| Jeffrey W. Saab | ASSOCIATE | 10.60 | 175.00   | 1,855.00   |
| Jennifer Vela   | PARALEGAL | 0.20  | 95.00    | 19.00      |

## Expenses

|            |      |      |                                                           |  |       |
|------------|------|------|-----------------------------------------------------------|--|-------|
| 06/01/2017 | L100 | E112 | ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA   |  |       |
|            |      |      | (INVOICE #37010343 FILING FEE: ADR COMMISSIONER OFFICE /  |  |       |
|            |      |      | SERVICES PROVIDED ON 5/10/17 )                            |  | 26.69 |
| 06/01/2017 | L100 | E112 | ATTORNEY SERVICE (9999) AMERICAN LEGAL SERVICES NEVADA    |  |       |
|            |      |      | (INVOICE #37010343 TO ISSUE A CHECK - SOUTHERN NEVADA     |  |       |
|            |      |      | HEALTH DISTRICT / SERVICES PROVIDED ON 5/10/17)           |  | 22.34 |
| 06/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE |  |       |
|            |      |      | #37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT /   |  |       |

Panorama Tower II  
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|            |      |      |                                                                                                                                                                                           |                   |
|------------|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| 06/01/2017 | L100 | E112 | SERVICES PROVIDED ON 5/11/17)                                                                                                                                                             | 2.87              |
|            |      |      | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/12/17)                                           | 2.87              |
| 06/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010568 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 05/22/2017)                                            | 2.87              |
| 06/14/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF ORDER RE: OBJECTION TO COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL)                                                        | 1.75              |
| 06/20/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (COURT PARKING, SPLIT WITH 1287.551)                                                                                                                    | 7.50              |
| 06/20/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (COURT PARKING, SPLIT WITH 1287.558)                                                                                                                    | 3.75              |
| 06/30/2017 | L100 | E101 | REPRODUCTION COSTS FOR JUNE 2017 (319 PAGES AT 0.08/PAGE)                                                                                                                                 | 12.76             |
| 07/17/2017 | L100 | E112 | ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS 1 MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S MOTION TO ENLARGE TIME) | 1.75              |
| 07/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR JULY 2017 (96 PAGES AT .08/PAGE)                                                                                                                                   | 3.84              |
| 08/01/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (PARKING) (SPLIT WITH ONE OTHER FILE)                                                                                                                   | 4.50              |
| 08/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37011415 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 07/18/2017)                                            | 2.87              |
| 08/01/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (PARKING) (SPLIT WITH ONE OTHER FILE)                                                                                                                   | 2.25              |
| 08/03/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37011682 FILING - EIGHTH JUDICIAL DISTRICT COURT)                                                                              | 2.87              |
| 08/07/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO ENLARGE TIME FOR SERVICE)                                            | 1.75              |
| 08/07/2017 | L100 | E112 | ODYSSEY (ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO ENLARGE TIME FOR SERVICE)                                                               | 1.75              |
| 08/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR AUGUST 2017 (228 PAGES AT .08/PAGE)                                                                                                                                | 9.12              |
|            |      |      | Total Expenses                                                                                                                                                                            | 114.10            |
|            |      |      | Total Current Work                                                                                                                                                                        | 3,195.60          |
|            |      |      | Previous Balance                                                                                                                                                                          | \$4,138.81        |
|            |      |      | Balance Due                                                                                                                                                                               | <u>\$7,334.41</u> |

| Past Due Amounts |       |       |          |         |      |
|------------------|-------|-------|----------|---------|------|
| 0-30             | 31-60 | 61-90 | 91-120   | 121-180 | 181+ |
| 3,195.60         | 0.00  | 0.00  | 4,138.81 | 0.00    | 0.00 |

Panorama Tower II  
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 PANORAMA TOWER II

Split Billing Summary

|                                                | <u>Fees</u> | <u>Expenses</u> | <u>Advances</u> | <u>Total</u> |
|------------------------------------------------|-------------|-----------------|-----------------|--------------|
| CHUBB INSURANCE - Panorama Tower I             | 2,600.25    | 102.16          | 0.00            | 2,702.41     |
| ESIS Dallas AGL Claims (2) - Panorama Tower II | 2,224.00    | 102.10          | 0.00            | 2,326.10     |
|                                                | 4,824.25    | 204.26          | 0.00            | 5,028.51     |

Task Code Recapitulation

|                                                          | <u>Fees</u> | <u>Expenses</u> |
|----------------------------------------------------------|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 0.00        | 114.10          |
| L110 FACT INVESTIGATION/DEVELOPMENT                      | 17.50       | 0.00            |
| L120 ANALYSIS/STRATEGY                                   | 87.50       | 0.00            |
| L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 26.25       | 0.00            |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 131.25      | 114.10          |
| L210 PLEADINGS                                           | 507.50      | 0.00            |
| L230 COURT MANDATED CONFERENCES                          | 1356.25     | 0.00            |
| L240 DISPOSITIVE MOTIONS                                 | 787.50      | 0.00            |
| L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS               | 271.25      | 0.00            |
| L200 PRE-TRIAL PLEADINGS AND MOTIONS                     | 2,922.50    | 0.00            |
| L320 DOCUMENT PRODUCTION                                 | 8.75        | 0.00            |
| L350 DISCOVERY MOTIONS                                   | 19.00       | 0.00            |
| L300 DISCOVERY                                           | 27.75       | 0.00            |

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

BREMER, WHYTE, BROWN & O'MEARA, LLP  
20320 S.W. BIRCH STREET  
SECOND FLOOR  
NEWPORT BEACH, CA 92660  
(949) 221-1000

TAX ID # 33-0747275

CHUBB INSURANCE  
2603 Camino Ramon, suite 300  
San Ramon CA 94583

Attn: Jeff Ganzer

Panorama Tower I  
48062208278589-A  
PANORAMA TOWER I  
~~~SEE NOTES~~~

Page: 1
September 01, 2017
Account No: 1287-5511M
Statement No: 10

Fees

| | | | | | Hours | |
|------------|-----|------|------|--|-------|-------|
| 03/02/2017 | DMC | L230 | A101 | PLAN AND PREPARE FOR FIRST SPECIAL MASTER HEARING
RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.33 | 56.88 |
| | DMC | L210 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S ANSWER TO CLIENTS'
COMPLAINT FOR DECLARATORY RELIEF AND THE
ASSOCIATION'S COUNTERCLAIM AGAINST CLIENTS IN
PREPARATION FOR STATUS REPORT TO CARRIER AND
DRAFTING CLIENTS' ANSWER TO COUNTERCLAIM (34 PAGES)
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.20 | 35.00 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL WITH ENCLOSURE TO JEREMY BEAL
(COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN
NEVADA PAVING) RE: PLAINTIFF'S FORTHCOMING CROSS
CLAIM AGAINST SOUTHERN NEVADA PAVING AND
STRATEGIES RELATING TO TODAY'S SPECIAL MASTER (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| | DMC | L230 | A109 | TRAVEL TO JAMS TO ATTEND SPECIAL MASTER HEARING
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.40 | n/c |
| | DMC | L230 | A109 | APPEAR FOR/ATTEND ATTEND SPECIAL MASTER HEARING
(ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.28 | 48.13 |
| | DMC | L230 | A109 | RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT
SPECIAL MASTER HEARING (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.30 | n/c |
| 03/03/2017 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER
HALE RE: SPECIAL MASTER HEARING REGARDING
DISCOVERY STATUS AND DISCOVERY SCHEDULING, IN
ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION | | |

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PANORAMA TOWER I
~~~SEE NOTES~~~

|            |     |      |      | IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                          | Hours |      |
|------------|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------|
|            |     |      |      |                                                                                                                                                                                                                                                                                                                  | 0.03  | 4.38 |
| 03/08/2017 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: REQUESTING PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                        | 0.03  | 4.13 |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE WITH COPY TO PLAINTIFF'S COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                            | 0.03  | 4.13 |
|            | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                              | 0.03  | 4.13 |
|            | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                           | 0.03  | 4.13 |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FORTHCOMING RESPONSE REGARDING DESIGNATING A MEDIATOR PENDING COMMUNICATION WITH CARRIER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                    | 0.03  | 4.13 |
|            | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                             | 0.03  | 4.13 |
| 03/09/2017 | DMC | L160 | A104 | REVIEW/ANALYZE FURTHER E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FURTHER DISCUSSION REGARDING SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25 |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED]<br>[REDACTED]                                                                                                                                                                                                                       | 0.05  | 8.25 |
| 03/10/2017 | DMC | L120 | A104 | REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER I, [REDACTED]<br>[REDACTED]                                                                                                                                                                                                        | 0.05  | 8.25 |
|            | DMC | L120 | A104 | REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER II, [REDACTED]                                                                                                                                                                                                                     |       |      |

Panorama Tower I  
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 PANORAMA TOWER I  
 ~~~SEE NOTES~~~

| | | | | Hours | |
|------------|-----|------|------|--|-------------|
| [REDACTED] | | | | 0.10 | 16.50 |
| 03/14/2017 | DMC | L120 | A103 | DRAFT/REVISE INTERNAL MEMORANDUM RE: DISCOVERY STRATEGIES/DISCOVERY PLAN [REDACTED] | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 66.00 |
| | DMC | L210 | A103 | DRAFT/REVISE (BEGIN) CLIENTS' ANSWER TO THE ASSOCIATION'S COUNTERCLAIM RE: OPENING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 16.50 |
| 03/15/2017 | DMC | L240 | A104 | REVIEW/ANALYZE AB 125 RE: SPECIFIC AMENDMENTS TO CHAPTER 40 RELATING TO A CLAIMANT'S REQUIREMENTS FOR A CONSTRUCTION DEFECT NOTICE AND TO BE IN ATTENDANCE AT A CONTRACTOR'S INSPECTIONS, [REDACTED] | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 33.00 |
| | DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S CIVIL ENGINEER'S EXPERT REPORT RE: ALLEGED DEFECTS AND DAMAGES TO THE MECHANICAL ROOM PIPING AND RECOMMENDED REPAIRS, IN ORDER TO INCLUDE ARGUMENTS IN CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 49.50 |
| | DMC | L240 | A103 | DRAFT/REVISE CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: AFFIDAVIT OF ATTORNEY PETER BROWN IN SUPPORT OF MOTION, INCLUDING CITATIONS TO EXHIBITS IN SUPPORT OF MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.95 156.75 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 49.50 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON | |

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| | | THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) PROCEDURAL HISTORY - (A) THE ASSOCIATION'S CHAPTER 40 NOTICE, INCLUDING SUMMARY OF ALLEGED DEFECTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.65 | 107.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) PROCEDURAL HISTORY - (B) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, INCLUDING CAUSES OF ACTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 | 49.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: DETAILED SUMMARY OF UNDISPUTED FACTS, INCLUDING CITATIONS TO ATTORNEY AFFIDAVIT AND SPECIFIC EXHIBITS IN SUPPORT OF FACTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.90 | 148.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL STANDARD FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): INTRODUCTION TO LEGAL ARGUMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.55 | 90.75 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (1) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL WINDOW DEFECT ALLEGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (2) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL FIREBLOCKING DEFECT ALLEGATION (TIME | | |

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| | DMC | L240 | A103 | 0.20 | 33.00 |
| | | | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| | | | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY | | |
| | | | JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND | | |
| | | | CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON | | |
| | | | THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR | | |
| | | | DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE | | |
| | | | ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (3) | | |
| | | | ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S | | |
| | | | MECHANICAL PIPING DEFECT ALLEGATION (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 57.75 |
| | DMC | L240 | A103 | | |
| | | | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY | | |
| | | | JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND | | |
| | | | CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON | | |
| | | | THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR | | |
| | | | DECLARATORY RELIEF RE: LEGAL ARGUMENT - (A) THE | | |
| | | | ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2)(b): (4) | | |
| | | | ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S | | |
| | | | SEWER LINE DEFECT ALLEGATION (TIME SPLIT WITH OTHER | | |
| | | | CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| | DMC | L240 | A103 | | |
| | | | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY | | |
| | | | JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND | | |
| | | | CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON | | |
| | | | THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR | | |
| | | | DECLARATORY RELIEF RE: LEGAL ARGUMENT - (B) THE | | |
| | | | ASSOCIATION DENIED CLIENTS' THEIR RIGHTS UNDER | | |
| | | | CHAPTER 40 BY FAILING TO PROVIDE NOTICE PRIOR TO | | |
| | | | PERFORMING REPAIRS (TIME SPLIT WITH OTHER CLAIM | | |
| | | | NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| | DMC | L240 | A103 | | |
| | | | DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY | | |
| | | | JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND | | |
| | | | CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON | | |
| | | | THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR | | |
| | | | DECLARATORY RELIEF RE: CONCLUSION AND REQUEST FOR | | |
| | | | RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| | | | CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L160 | A104 | | |
| | | | REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF | | |
| | | | SPECIAL MASTER HALE RE: SPECIAL MASTER'S REQUEST | | |
| | | | FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF | | |
| | | | BRUCE EDWARDS AS MEDIATOR IN ORDER TO DETERMINE | | |
| | | | WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME | | |
| | | | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 03/20/2017 | DMC | L160 | A104 | | |
| | | | REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF | | |
| | | | SPECIAL MASTER HALE RE: SPECIAL MASTER'S REQUEST | | |
| | | | FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF | | |
| | | | BRUCE EDWARDS AS MEDIATOR, IN ORDER TO DETERMINE | | |
| | | | WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME | | |
| | | | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A103 | | |
| | | | DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE | | |
| | | | HOLLOMAN OF SPECIAL MASTER HALE RE: SPECIAL | | |
| | | | MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING | | |
| | | | APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR AND | | |
| | | | FORTHCOMING FOLLOW UP WITH CARRIER REGARDING | | |
| | | | SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER | | |

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| | | | REQUEST) | 0.05 | 8.25 |
| DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: ADDITIONAL DISCUSSION REGARDING SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE RE: ADDITIONAL DISCUSSION REGARDING SPECIAL MASTER'S REQUEST FOR CARRIER'S RESPONSE REGARDING APPOINTMENT OF BRUCE EDWARDS AS MEDIATOR, AND PROPOSED STRATEGIES PENDING CARRIER'S RESPONSE ((TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: [REDACTED] | 0.05 | 8.25 |
| DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE: [REDACTED] | 0.05 | 8.25 |
| PCB | L240 | A103 | DRAFT/REVISE (FINALIZE) MOTION FOR SUMMARY JUDGMENT ON THIRD CAUSE OF ACTION RE: ADDITIONAL DISCUSSION OF THE FAILURE OF THE HOA TO ADEQUATELY PRESERVE EVIDENCE AND THE HOA'S FAILURE TO PROVIDE CHAPTER 40 NOTICE FOR CERTAIN ISSUES (TIME SPLIT WITH OTHER FILE IN SAME CASE/OTHER TOWER - AS PER CARRIER REQUEST). | 0.10 | 18.50 |
| RHR | L120 | A105 | COMMUNICATE (IN FIRM) (NON-BILLABLE) TO DISCUSS CASE STRATEGY [REDACTED] | 0.30 | n/c |
| RHR | L120 | A104 | REVIEW/ANALYZE CASE FILE INCLUDING DISCOVERY, DEPOSITORY INDEX, COMPLAINT, ANSWER COUNTERCLAIM, AND OTHER RELEVANT IN PREPARATION TO SUBPOENA DOCUMENTS FROM DEPARTMENT WITH RECORDS OF CITATION MORE SPECIFICALLY TO PREPARE AND PLAN TO RESEARCH PROPER DEPARTMENT WITH RECORDS ON CITATIONS ISSUED TO PLAINTIFF. | 0.45 | 74.25 |
| 03/23/2017 | PCB | L240 | A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE LATEST MOTION FILED BY THE DEFENSE AND WHY IT WAS FILED. | 0.05 | 9.25 |
| | RHR | L120 | A104 REVIEW/ANALYZE (NON-BILLABLE) RECENT SUPPLEMENTAL STATUS REPORT AND CASE HISTORY TO FAMILIARIZE WITH CASE STRATEGY AND HISTORY TO ASSIST WITH LEGAL DEFENSE MOVING FORWARD. | 0.90 | n/c |
| 03/24/2017 | PCB | L240 | A103 DRAFT/REVISE EMAIL TO COUNSEL FOR HOA RE: | | |

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| CONFIRMATION OF AGREEMENT TO EXTEND HEARING DATE FOR MOTION FOR SUMMARY JUDGMENT AND TIMING FOR RESPONSE TO SAME (TIME SPLIT WITH OTHER FILE IN SAME CASE - OTHER TOWER - AS PER CARRIER REQUEST). | | | | | 0.05 | 9.25 |
| 03/27/2017 | DMC | L240 | A103 | DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S OPPOSITION TO CLIENTS' MOTION FOR SUMMARY JUDGMENT AND HEARING ON MOTION | 0.05 | 8.25 |
| | DMC | L250 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: CASE MANAGEMENT ORDER ENTERED BY THE COURT, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS | 0.05 | 8.25 |
| | | | | | | |
| 03/28/2017 | DMC | L120 | A105 | COMMUNICATE (IN FIRM) WITH PARTNER PETER BROWN RE: DEFENSE STRATEGIES [REDACTED]
[REDACTED]
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | PCB | L240 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA (TWO SEPARATE CALLS) RE: DISCUSSION ABOUT THE MOTION FOR PARTIAL SUMMARY JUDGMENT, PLAINTIFF'S REQUEST FORM ADDITIONAL TIME, MOVING THE HEARING DATE, AND ISSUES RELATED TO THE OVERALL CASE (TIME SPLIT WITH OTHER FILE - SECOND TOWER/DIFFERENT CLAIM NUMBER - AS REQUESTED BY CARRIER). | 0.10 | 18.50 |
| | | | | | | |
| 03/30/2017 | JBV | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY RECORDER OFFICE DOCUMENTS, RE: DEVELOPER SERVICES AGREEMENT IN PREPARATION FOR RECEIVING DOCUMENTS FOR REVIEW AND ANALYSIS OF THE CASE. | 0.10 | 9.50 |
| 03/31/2017 | PCB | L190 | A103 | DRAFT/REVISE RESPONSE TO PLAINTIFF'S ALLEGED "NOTICE" OF NEW WINDOW ISSUE, INCLUDING DISCUSSION OF WHAT CONSTITUTES AN ACTUAL CHAPTER 40 NOTICE, THE ISSUES SURROUNDING THE WINDOW REPAIRS, AND STATUTE OF REPOSE ISSUES (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER CARRIER REQUEST). | 0.25 | 43.75 |
| 04/03/2017 | DMC | L120 | A103 | DRAFT/REVISE (BEGIN) SUPPLEMENTAL STATUS REPORT TO CARRIER RE: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.85 | 148.75 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) SUPPLEMENTAL STATUS REPORT TO CARRIER RE: [REDACTED]
[REDACTED] | | |
| | | | | | | |

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| [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | | | | 0.65 | 113.75 |
| 04/04/2017 | DMC | L240 | A104 | REVIEW/ANALYZE ORDER EXECUTED BY THE COURT RE: CLIENTS' MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION AND STIPULATION TO CONTINUE DEADLINES FOR BRIEFING AND HEARING DATE, IN ORDER TO DETERMINE IF ANY ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| | DMC | L120 | A103 | [REDACTED] | 0.05 | 8.75 |
| | DMC | L120 | A103 | [REDACTED] | 0.05 | 8.75 |
| 04/05/2017 | MD | L320 | A104 | REVIEW/ANALYZE CASE MANAGEMENT ORDER RE: ANALYSIS OF PRETRIAL INFORMATION AND CONFIRMATION OF UPCOMING PRETRIAL DEADLINES IN PREPARATION FOR INSURANCE QUESTIONNAIRE, SPECIAL INTERROGATORIES AND STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.20 | 19.00 |
| | MD | L320 | A103 | DRAFT/REVISE BEGIN RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" RE: INSURANCE QUESTIONNAIRE IN PREPARATION FOR COMPLETION OF DEFENDANTS RESPONSES TO CASE MANAGEMENT ORDER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 14.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: MODIFICATION OF BRIEFING SCHEDULE AND CONTINUATION OF HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING WITH THE COURT AND SERVICE ON OPPOSING COUNSEL | 0.05 | 8.75 |
| 04/06/2017 | MD | L320 | A103 | DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" RE: SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.35 | 33.25 |
| | DMC | L250 | A104 | REVIEW/ANALYZE COMMUNICATION FROM THE COURT RE: ARBITRATION SELECTION LIST PROVIDING RANDOM LIST OF ARBITRATORS PURSUANT TO RULE 6 OF NEVADA ARBITRATION RULES, AND INSTRUCTIONS TO PROVIDE RESPONSE TO ADR COMMISSIONER WITHIN TEN DAYS, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (4 PAGES) | 0.05 | 8.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE WITH ENCLOSURE TO E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |

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| [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) |    |      |      |                                                                                                                                                                                                                                                                                                     | 0.05  | 8.75  |
| 04/07/2017                                                            | MD | L320 | A104 | REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                  | 0.05  | 4.75  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                         | 0.05  | 4.75  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).          | 0.10  | 9.50  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE NEVADA STATE CONTRACTORS BOARD WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                | 0.10  | 9.50  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE LAS VEGAS BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).             | 0.10  | 9.50  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY CLERK'S OFFICE FICTITIOUS NAME SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORY NUMBER 5 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.10  | 9.50  |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM INSURANCE MANUAL RE: INSURANCE INFORMATION IN PREPARATION FOR RESPONSES TO CASE MANAGEMENT ORDER SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                              | 0.30  | 28.50 |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE WESTCHESTER EXCESS POLICY RE: INSURANCE INFORMATION IN PREPARATION FOR LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC'S RESPONSES TO CASE MANAGEMENT ORDER SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                  | 0.30  | 28.50 |
|                                                                       | MD | L320 | A104 | REVIEW/ANALYZE PRIOR LITIGATION DISCOVERY RE: CASE MANAGEMENT ORDER RESPONSES AND DISCOVERY IN PREPARATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER'S RESPONSES TO                                                                                                   |       |       |



|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Hours |       |
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|            |      |      | SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 0.35  | 33.25 |
| DMC        | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING WHETHER THE ASSOCIATION WILL SEEK AN EXEMPTION IN LIGHT OF ITS COUNTERCLAIM AND THIRD-PARTY CLAIM AND IN LIGHT OF THE AMOUNT OF THE ASSOCIATION'S ALLEGED POTENTIAL DAMAGES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                   | 0.10  | 17.50 |
| DMC        | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: ADDITIONAL DISCUSSION REGARDING PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING THE ASSOCIATION'S PROPOSAL TO SEEK AN EXEMPTION IN LIGHT OF ITS COUNTERCLAIM AND THIRD-PARTY CLAIM AND IN LIGHT OF THE AMOUNT OF THE ASSOCIATION'S ALLEGED POTENTIAL DAMAGES AND REQUEST THAT CLIENTS NOT OBJECT TO SAME, IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.75  |
| MD         | L320 | A104 | REVIEW/ANALYZE CITY OF HENDERSON BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                               | 0.10  | 9.50  |
| MD         | L320 | A104 | REVIEW/ANALYZE NORTH LAS VEGAS BUSINESS LICENSING DEPARTMENT WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                           | 0.10  | 9.50  |
| MD         | L320 | A103 | DRAFT/REVISE (CONTINUE) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" SPECIAL INTERROGATORIES RE: INSURANCE INFORMATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                                                                                                                                                                                                                                         | 0.40  | 38.00 |
| MD         | L320 | A104 | REVIEW/ANALYZE SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS II, LLC IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1-4.                                                                                                                                                                                                                                                                                                                                                                                    | 0.10  | 9.50  |
| 04/10/2017 | DMC  | L120 | A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED JOINT STRATEGIES FOR RESPONSE TO COURT REGARDING MANDATORY ARBITRATION, INCLUDING THE ASSOCIATION'S MOTION FOR EXEMPTION FROM ARBITRATION IN EXCHANGE FOR AGREEMENT NOT TO OPPOSE SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                         | 0.05  | 8.75  |
| 04/11/2017 | MD   | L320 | A103 DRAFT/REVISE (BEGIN) DRAFT OF INSURANCE SPREADSHEET IN PREPARATION FOR EXHIBIT A TO RESPONSES TO INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM                                                                                                                                                                                                                                                                                                                                                                                   |       |       |

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| | | | | NO./FILE PER CARRIER REQUEST). | 0.20 | 19.00 |
| | MD | L320 | A103 | DRAFT/REVISE (BEGIN) DRAFT OF LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.20 | 19.00 |
| | MD | L320 | A103 | DRAFT/REVISE (BEGIN) DRAFT OF M.J. DEAN CONSTRUCTION, INC.'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.20 | 19.00 |
| | MD | L320 | A103 | DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" RE: INSURANCE QUESTIONNAIRE IN PREPARATION FOR COMPLETION OF PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.15 | 14.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: RESPONSE TO CLIENT'S OBJECTION TO THE ASSOCIATION'S INTENT TO PERFORM REPAIRS TO UNIT 200 AND FAILURE TO PROVIDE CHAPTER 40 NOTICE OF SAME, AND STATING THAT THE ASSOCIATION DOES NOT INTEND TO PURSUE A CHAPTER 40 CLAIM RELATING TO THIS ISSUE, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| 04/12/2017 | MD | L320 | A103 | DRAFT/REVISE (BEGIN) M.J. DEAN RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" SPECIAL INTERROGATORIES RE: INSURANCE INFORMATION. | 0.35 | 33.25 |
| 04/17/2017 | MD | L320 | A104 | REVIEW/ANALYZE (BEGIN) REVIEW OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM RE: CONTRACT LIST IN PREPARATION FOR MATRIX TO BE USED IN RESPONSES TO CASE MANAGEMENT ORDER STATEMENT OF WORK FOR PLAINTIFF M.J. DEAN CONSTRUCTION, INC (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.55 | 52.25 |
| | MD | L320 | A103 | DRAFT/REVISE (BEGIN) MATRIX OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM CONTRACT LIST RE: NAME OF CONTRACTOR, CONTRACT START AND END DATE, DESCRIPTION OF WORK, ORIGINAL SELF PERFORMED CONTRACT VALUE, CHANGE ORDER, AND TOTAL CONTRACT VALUE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.65 | 61.75 |
| 04/18/2017 | MD | L320 | A104 | REVIEW/ANALYZE (CONTINUE) REVIEW OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM RE: CONTRACT LIST IN PREPARATION FOR MATRIX TO BE USED IN RESPONSES TO CASE MANAGEMENT ORDER STATEMENT OF WORK FOR PLAINTIFF M.J. DEAN CONSTRUCTION, INC (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.70 | 66.50 |
| | MD | L320 | A103 | DRAFT/REVISE (CONTINUE) MATRIX OF PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM CONTRACT LIST RE: NAME OF CONTRACTOR, CONTRACT START AND END DATE, DESCRIPTION OF WORK, ORIGINAL SELF PERFORMED | | |

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|     |      |                                                                                                                                                                                                                                                                                                                                                                                 | Hours |       |
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|     |      | CONTRACT VALUE, CHANGE ORDER, TOTAL CONTRACT VALUE, AND TOWER WHERE CONTRACTOR/SUBCONTRACTOR WORKED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                                                                                                 | 0.80  | 76.00 |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN CONSTRUCTION, INC.'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                       | 0.15  | 14.25 |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                          | 0.15  | 14.25 |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                          | 0.15  | 14.25 |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                                          | 0.15  | 14.25 |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                                                                                | 0.10  | 9.50  |
| MD  | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ, LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                                | 0.10  | 9.50  |
| DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: CASE STATUS, OUTCOME OF RECENT SPECIAL MASTER HEARING AND WHETHER BWBO WILL BE DEFENDING SOUTHERN NEVADA PAVING AGAINST THE ASSOCIATION'S CROSS-CLAIM, IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.75  |
| DMC | L120 | A104 REVIEW/ANALYZE COMMUNICATION FROM THE ASSOCIATION'S RE: UNSTAMPED/UNFILED BUT EXECUTED REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY OPPOSITION OR OTHER ACTION IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                       | 0.05  | 8.75  |
| DMC | L120 | A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S REQUEST FOR EXEMPTION FROM                                                                                                                                                                                                                                       |       |       |

|            |     |      |                                                                                                                                                                                                                                                                                                                                                                                                                                              | Hours |       |
|------------|-----|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|
|            |     |      | ARBITRATION, THE ASSOCIATION'S PENDING CROSS CLAIM AND SERVICE OF SAME, IN PREPARATION FOR STATUS REPORT TO CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                              | 0.05  | 8.75  |
|            | DMC | L120 | A103 DRAFT/REVISE RESPONSE (WITH MULTIPLE ENCLOSURES) TO E-MAIL FROM JEREMY BEAL (COUNSEL FOR ENROLLED SUBCONTRACTOR SOUTHERN NEVADA PAVING) RE: CASE STATUS, OUTCOME OF RECENT SPECIAL MASTER HEARING, THAT BWBO HAS NOT BEEN RETAINED TO DEFEND SOUTHERN NEVADA PAVING AGAINST THE ASSOCIATION'S CROSS-CLAIM AND THAT THE ASSOCIATION HAS NOT BEGUN SERVICE OF ITS CROSS-CLAIM. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.75  |
|            | DMC | L250 | A104 REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S FILE STAMPED REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY                                                                                                                                                                                                                   | 0.05  | 8.75  |
|            | DMC | L120 | A103 DRAFT/REVISE E-MAIL TO JEFFREY GANZER (ADJUSTER) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                              | 0.05  | 8.75  |
|            | DMC | L120 | A103 DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                    | 0.05  | 8.75  |
| 04/19/2017 | DMC | L250 | A104 REVIEW/ANALYZE THE ASSOCIATION'S NOTICE OF FILING OF IT'S REQUEST FOR EXEMPTION FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER ACTION IS NECESSARY (8 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                         | 0.05  | 8.75  |
| 04/20/2017 | DMC | L120 | A104 REVIEW/ANALYZE CORRESPONDENCE FROM DEE HOPPER (COUNSEL FOR THE ASSOCIATION) TO SPECIAL MASTER HALE RE: REQUEST FOR STAY OF CASE MANAGEMENT ORDER DEADLINES PENDING THE COURT'S RULING ON CLIENT'S MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                           | 0.05  | 8.75  |
|            | DMC | L120 | A104 REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                | 0.25  | 43.75 |
|            | DMC | L120 | A104 REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSE TO CASE MANAGEMENT ORDER STATEMENT OF WORK (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY, AND EDIT AND SUPPLEMENT SAME, IN                                                                                                                                                                                                                                            |       |       |

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| | | | | PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 17.50 |
| DMC | L120 | A104 | | REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSE TO CASE MANAGEMENT ORDER INSURANCE QUESTIONNAIRE (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 17.50 |
| DMC | L120 | A104 | | REVIEW/ANALYZE EXHIBIT TO CLIENT MJ DEANS RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES AND STATEMENT OF WORK (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (25 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 26.25 |
| DMC | L120 | A104 | | | | |
| DMC | L120 | A104 | | | 0.10 | 17.50 |
| DMC | L120 | A104 | | | 0.05 | 8.75 |
| DMC | L120 | A104 | | | 0.05 | 8.75 |
| DMC | L120 | A104 | | REVIEW/ANALYZE EXHIBIT TO CLIENTS' RESPONSES TO CASE MANAGEMENT ORDER INTERROGATORIES AND INSURANCE QUESTIONNAIRE (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND EDIT AND SUPPLEMENT SAME, IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| 04/21/2017 | MD | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO ALL COUNSEL RE: SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.10 | 9.50 |
| | MD | L320 | A103 | DRAFT/REVISE SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT RE: RECORDS FOR CITATIONS AND INSPECTIONS AT PANORAMA TOWERS. | | |

| | | | Hours | |
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| | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 14.25 |
| DMC | L120 | A104 REVIEW/ANALYZE CORRESPONDENCE FROM FLOYD HALE TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: 30-DAY EXTENSION TO PROVIDE THE ASSOCIATION'S DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| DMC | L120 | A103 DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: CLIENTS' FORTHCOMING REQUEST FOR 30-DAY EXTENSION TO PROVIDE CLIENTS' DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| DMC | L120 | A103 DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: REQUEST FOR EXTENSION TO PROVIDE CLIENTS' RESPONSES TO CASE MANAGEMENT ORDER WRITTEN DISCOVERY, IN LIGHT OF CLIENTS' PENDING MOTIONS FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 26.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBPOENA DUCES TECUM TO THE SOUTHERN NEVADA HEATH DISTRICT (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE OF PROCESS ON THE WITNESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| DMC | L120 | A104 REVIEW/ANALYZE NOTICE OF DEPOSITION OF CUSTODIAN OF RECORDS FOR THE SOUTHERN NEVADA HEATH DISTRICT (PREPARED BY ASSISTANT CRYSTAL WILLIAMS) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE OF PROCESS ON THE WITNESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| MD | L320 | A104 REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: LAST KNOWN ADDRESS AND PHONE NUMBER FOR CONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM IN PREPARATION FOR EXHIBIT B TO CASE MANAGEMENT ORDER RESPONSES. | | |
| | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.60 | 57.00 |
| MD | L320 | A104 REVIEW/ANALYZE NEVADA STATE BOARD OF CONTRACTORS WEBSITE RE: LAST KNOWN ADDRESS AND PHONE NUMBER FOR CONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM IN PREPARATION FOR EXHIBIT B TO CASE MANAGEMENT ORDER RESPONSES. | | |
| | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.60 | 57.00 |
| MD | L320 | A103 DRAFT/REVISE (CONTINUE AND FINALIZE) EXHIBIT B TO CASE MANAGEMENT RESPONSES RE: SUBCONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM. | 0.45 | 42.75 |

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|------------|-----|------|------|---|------------|
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: NO OBJECTION TO CLIENTS' REQUEST TO SPECIAL MASTER HALE FOR 30-DAY EXTENSION TO PROVIDE DISCOVERY RESPONSES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| 04/24/2017 | MD | L320 | A103 | DRAFT/REVISE (CONTINUE AND FINALIZE) INSURANCE MATRIX TO BE USED TO CASE MANAGEMENT RESPONSES EXHIBIT C - INSURANCE QUESTIONNAIRE.

(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 28.50 |
| 04/25/2017 | DMC | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: APPROVAL OF REQUEST FOR THIRTY DAY EXTENSION TO ISSUE CLIENTS' EXPERT DISCLOSURES IN LIGHT OF CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| 04/27/2017 | MD | L320 | A108 | COMMUNICATE (OTHER EXTERNAL) PHONE CALL WITH HEATHER FROM SOUTHERN NEVADA HEALTH DISTRICT RE: SUBPOENA DUCES TECUM RECEIVED AND DOCUMENTS NEEDED FROM SEWER LINE BREAK CITATION.

(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 9.50 |
| | MD | L320 | A104 | REVIEW/ANALYZE AFFIDAVIT OF SERVICE RE: CUSTODIAN OF RECORDS FOR SOUTHERN NEVADA HEALTH DISTRICT TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY.

(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 4.75 |
| 04/28/2017 | DMC | L120 | A104 | REVIEW/ANALYZE LIEN DOCUMENTS OBTAINED FROM THE CLARK COUNTY ASSESSOR PURSUANT TO CLIENTS' SUBPOENA RE: POTENTIAL EVIDENCE INVOLVING THE STATUTORY DATE OF SUBSTANTIAL COMPLETION OF THE PROJECT, IN ORDER TO DETERMINE IMPACT ON CLIENTS' DEFENSES TO CLAIMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| 05/08/2017 | JBV | L320 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM SOUTHERN NEVADA HEALTH DISTRICT, RE: ISSUES PROVIDING PERMITS/RECORDS FOR PROJECT SITE, IN PREPARATION FOR COMPLYING WITH ALL REQUIREMENTS TO OBTAIN ALL REQUESTED DOCUMENTATION. | 0.05 4.75 |
| | JBV | L320 | A103 | DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO | |

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|            |     |      | SOUTHERN NEVADA HEALTH DISTRICT, RE: OBTAINING PERMITS/RECORDS FOR THE PROJECT SITE.                                                                                                                                                                                                                                                                              | 0.05  | 4.75  |
|            | DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM BERNADETTE TIONGSON (COUNSEL FOR INSULPRO) RE: THE ASSOCIATION'S COUNTERCLAIM AGAINST INSULPRO AND WHETHER BWBO HAS BEEN RETAINED TO DEFEND THE SUBCONTRACTORS ENROLLED IN THE WRAP, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 8.75  |
|            | DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM HEATHER ANDERSON-FINTAK (ASSOCIATE GENERAL COUNSEL FOR THE SOUTHERN NEVADA HEALTH DISTRICT) RE: CLIENTS' SUBPOENA DUCES TECUM IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                        | 0.05  | 8.75  |
|            | DMC | L250 | A104 REVIEW/ANALYZE COMMISSIONER'S DECISION ON THE ASSOCIATION'S REQUEST FOR EXEMPTION FROM ARBITRATION AND IMPOSITION OF SANCTIONS FOR LATE FILING OF SAME, IN ORDER TO DETERMINE WHAT OBJECTION OR OTHER RESPONSE IS NECESSARY IN LIGHT OF IMPROPER IMPOSITION OF SANCTIONS ON CLIENT SINCE IT WAS THE ASSOCIATION WHO REQUESTED THE EXEMPTION FROM ARBITRATION | 0.05  | 8.75  |
| 05/09/2017 | DMC | L240 | A102 RESEARCH LEGAL RESEARCH RE: CURRENT LEGAL AUTHORITY IN SUPPORT OF CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                          | 0.40  | 70.00 |
|            | DMC | L240 | A103 DRAFT/REVISE (BEGIN) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: OPENING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                           | 0.20  | 35.00 |
|            | DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                   | 0.30  | 52.50 |
|            | DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (A) FACTS NOT DISPUTED BY THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)     | 0.30  | 52.50 |
|            | DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON                                                                                                                                                                                                        |       |       |



|     |      |                                                                                                                                                                                                                                                                                                                                                                                                                                    | Hours |        |
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|     |      | CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(1) THE ALLEGED DEFECTS IN UNIT 300 WERE KNOWN TO THE ASSOCIATION PRIOR TO COMMENCING REPAIRS, HOWEVER THE ASSOCIATION FAILED TO PROVIDE NOTICE PRIOR TO COMMENCING REPAIRS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                             | 0.40  | 70.00  |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(2) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED WINDOWS AND FIREBLOCKING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)       | 0.45  | 78.75  |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(3) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED MECHANICAL ROOM PIPING DEFECTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30  | 52.50  |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (B)(4) THE ASSOCIATION FAILED TO COMPLY WITH NRS 40.645(2) REGARDING THE ALLEGED SEWER PROBLEMS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                 | 0.95  | 166.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: (C) A STAY OF THE LITIGATION WILL NOT CURE THE ASSOCIATION'S NOTICE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                             | 0.20  | 35.00  |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON CLIENTS' THIRD CLAIM FOR RELIEF IN CLIENTS' DECLARATORY RELIEF COMPLAINT RE: LEGAL ARGUMENT: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                               | 0.20  | 35.00  |
| DMC | L240 | A103 DRAFT/REVISE PO REQUEST FOR RECONSIDERATION OF IMPOSITION OF SANCTIONS FOR UNTIMELY FILING OF REQUEST FOR EXEMPTION FROM ARBITRATION GIVEN THAT THE LATE REQUEST WAS FILED BY THE ASSOCIATION, THUS ANY SANCTIONS SHOULD BE IMPOSED ON THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER                                                                                                                     |       |        |

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                     | Hours |        |
|------------|-----|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| REQUEST)   |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                     | 0.80  | 140.00 |
| 05/10/2017 | PCB | L240 | A103 | DRAFT/REVISE (FINALIZE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE COUNTER-CLAIM AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON THIRD CLAIM FOR RELIEF RE: ADDITIONAL DISCUSSION OF THE TIMING OF THE WORK PERFORMED BY PLAINTFF'S EXPERTS, THE DISCOVERY OF DEFECTS, THE PROBLEMS ASSOCIATED WITH THE LACK OF NOTICE, AND THE ASSOCIATION'S UTTER FAILURE TO COMPLY WITH CHAPTER 40. | 0.20  | 35.00  |
|            | DMC | L250 | A104 | REVIEW/ANALYZE COMMUNICATION FROM THE DISCOVERY COMMISSIONER RE: CLIENT'S OBJECTION TO DISCOVERY COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL, IN ORDER TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                 | 0.05  | 8.75   |
| 05/12/2017 | DMC | L120 | A104 | REVIEW/ANALYZE AMENDED NOTICE OF TAKING THE DEPOSITION OF THE CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT, PREPARED BY LEGAL ASSISTANT, FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON THE WITNESS AND ALL COUNSEL (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                             | 0.05  | 8.75   |
| 05/15/2017 | JWS | L120 | A104 | REVIEW/ANALYZE (BEGIN) CORRESPONDENCE AND NOTES TO ASSIST WITH SUPPLEMENTAL REPORT AND CASE PLANNING SESSION.                                                                                                                                                                                                                                                                                       | 0.20  | 35.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE: STATUS OF RECEIVING RECORDS IN RESPONSE TO SUBPOENA DUCES TECUM, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND DISCLOSING PURSUANT TO N.R.C.P. 16.1.                                                                                                                                             | 0.05  | 4.75   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENA DUCES TECUM FROM THE SOUTHERN NEVADA HEALTH DISTRICT, RE: VERIFYING ALL DOCUMENTS ARE LEGIBLE FOR ATTORNEY ANALYSIS.                                                                                                                                                                                                                      | 0.10  | 9.50   |
|            | JBV | L320 | A103 | DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE: CONFIRMATION OF RECEIPT OF RECORDS IN RESPONSE TO SUBPOENA DUCES TECUM.                                                                                                                                                                                                                              | 0.05  | 4.75   |
| 05/16/2017 | DMC | L240 | A104 | REVIEW/ANALYZE COURT'S MINUTE ORDER RE: CLIENTS' PENDING MOTION FOR SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHAT ACTION IS NECESSARY ON BEHALF OF CLIENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                 | 0.05  | 8.75   |
|            | DMC | L120 | A104 | REVIEW/ANALYZE AFFIDAVIT OF JACQUELINE RESZETAR (THE CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT) IN RESPONSE TO CLIENTS' SUBPOENA IN ORDER TO DETERMINE WHAT ACTION OR OTHER RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                     | 0.05  | 8.75   |

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| | DMC | L350 | A104 | REVIEW/ANALYZE RENOTICE OF HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGMENT AGAINST THE ASSOCIATION (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| 05/17/2017 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO DEE HOPPER (COUNSEL FOR THE ASSOCIATION) RE: PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN PREPARATION FOR ADDITIONAL DISCUSSION REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: RESPONSE TO BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: ADDITIONAL DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN ORDER TO DETERMINE WHETHER ANY REPLY OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | DMC | L120 | A103 | DRAFT/REVISE REPLY TO E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: ADDITIONAL DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE FURTHER E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: FURTHER DISCUSSION REGARDING BWBO'S PROPOSED STRATEGIES RELATING TO CASE MANAGEMENT ORDER DISCOVERY RESPONSES IN LIGHT OF THE COURT'S CONTINUANCE OF HEARING ON OUR CLIENTS' MOTION FOR SUMMARY JUDGMENT, IN PREPARATION FOR DRAFTING JOINT REQUEST TO SPECIAL MASTER HALE REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | DMC | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: JOINT REQUEST ON BEHALF OF OUR CLIENTS' AND THE ASSOCIATION TO CONTINUE THE DEADLINE TO PROVIDE RESPONSES TO CASE MANAGEMENT ORDER WRITTEN DISCOVERY IN LIGHT OF CONTINUANCE OF CLIENTS' | |

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| | DMC | L250 | A104 | PENDING MOTION FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 26.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE COURT ORDER FROM JUDGE SUSAN JOHNSON ON BEHALF OF DISCOVERY COMMISSIONER SUSTAINING BWBO'S OBJECTION TO SANCTIONS AGAINST BWBO COUNSEL FOR THE ASSOCIATION'S UNTIMELY FILING OF A REQUEST FOR EXEMPTION FROM ARBITRATION, AND IMPOSING SANCTIONS AGAINST THE ASSOCIATION, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | JBV | L120 | A109 | REVIEW/ANALYZE CLIENTS' NOTICE VACATING THE DEPOSITION OF CUSTODIAN OF RECORDS OF THE SOUTHERN NEVADA HEALTH DISTRICT (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |
| | JWS | L310 | A109 | APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL [REDACTED] | 0.15 14.25 |
| | | | | [REDACTED] | 0.15 26.25 |
| 05/18/2017 | DMC | L120 | A104 | APPEAR FOR/ATTEND LITIGATION STRATEGY SESSION, [REDACTED] | |
| | DMC | L120 | A103 | REVIEW/ANALYZE DOCUMENTS OBTAINED FROM THE SOUTHERN NEVADA HEALTH DISTRICT IN RESPONSE TO CLIENTS' SUBPOENA DUCES TECUM RE: ALLEGED SEWER LINE FAILURE IN ORDER TO DETERMINE POTENTIAL IMPACT ON CLIENTS' DEFENSE TO SEWER LINE DEFECT CLAIM FOR FUTURE SUMMARY JUDGMENT MOTION THAT THE CLAIM IS TIME BARRED BY THE STATUTE OF LIMITATIONS (46 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 70.00 |
| | DMC | L230 | A104 | DRAFT/REVISE SUMMARY OF ATTORNEY ANALYSIS OF DOCUMENTS OBTAINED FROM THE SOUTHERN NEVADA HEALTH DISTRICT IN RESPONSE TO CLIENTS' SUBPOENA DUCES TECUM FOR FUTURE USE IN THE COURSE OF DISCOVERY AND DEVELOPMENT OF DEFENSE AND DISCOVERY STRATEGIES, INCLUDING FUTURE SUMMARY JUDGMENT MOTION THAT THE CLAIM IS TIME BARRED BY THE STATUTE OF LIMITATIONS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.55 96.25 |
| 05/19/2017 | DMC | L230 | A104 | REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: SPECIAL MASTER HEARING REGARDING DISCOVERY STATUS AND DISCOVERY SCHEDULING, IN ORDER TO DETERMINE WHETHER ANY OBJECTION OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.75 |

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| 05/22/2017 | JWS | L120 | A103 | DRAFT/REVISE (BEGIN) SUMMARY RE: PROCEDURAL POSTURE AND CASE DEVELOPMENTS ASSIST WITH FURTHER HANDLING.                                                                                                                                                                                                            | 0.10 17.50  |
| 05/31/2017 | PCB | L120 | A104 | REVIEW/ANALYZE CURRENT STATUS OF PLAINTIFF'S CLAIMS<br>[REDACTED]<br>(TIME SPLIT WITH OTHER FILE IN SAME CASE AS PER CARRIER DIRECTIVE).                                                                                                                                                                           | 0.20 35.00  |
| 06/13/2017 | JBV | L350 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH FORMER COUNSEL, DARLENE CARTIER, RE: ISSUES WITH COMMISSIONER'S DECISION TO SANCTION CLIENT MISTAKENLY, IN PREPARATION FOR ENSURING ISSUES ARE RESOLVED AND CORRECT PARTY IS SANCTIONED.                                                                                  | 0.10 9.50   |
|            | JBV | L350 | A104 | REVIEW/ANALYZE ORDER REGARDING OBJECTION TO ADR COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL FOR THE HOA, RE: ENSURING PROPER COUNSEL IS SANCTIONED AND PAYS FEES.                                                                                                               | 0.05 4.75   |
|            | JBV | L350 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM PRIOR COUNSEL, DARLENE CARTIER TO ADR COMMISSIONER, RE: PROVIDING THE ORDER RE: OBJECTION TO ADR COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL, IN PREPARATION FOR ENSURING COUNSEL FOR HOA IS HELD RESPONSIBLE.                         | 0.05 4.75   |
| 06/19/2017 | PCB | L240 | A101 | PLAN AND PREPARE (BEGIN) FOR TOMORROW'S HEARING ON MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT RE: [REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER FILE - BWB&O File #1287.558 - THAT DEALS WITH TOWER II).                                                                             | 1.10 192.50 |
|            | PCB | L240 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S HEARING ON THE MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE 3RD CAUSE OF ACTION RE: CONTINUE TO DRAFT ORAL ARGUMENT OUTLINE, [REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II). | 0.40 70.00  |
|            | JWS | L230 | A101 | PLAN AND PREPARE FOR (BEGIN) HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT. REVIEW, ANALYZE AND OUTLINE MOVING PAPERS WITH EXHIBITS (APPROXIMATELY 200 PAGES). [REDACTED]<br>[REDACTED]<br>(TIME ALREADY SPLIT WITH 1287.558)                                                                                    | 0.65 113.75 |
|            | JWS | L230 | A104 | REVIEW/ANALYZE (BEGIN) LEGAL RESEARCH, CASES CITED IN SUPPORT/AGAINST MOTION FOR SUMMARY JUDGMENT, GENERAL HOLDINGS/APPLICABILITY, AND FACTUAL                                                                                                                                                                     |             |

|            |     |      |                                                                                                                                                                                                                                                                                                                                                                                                  | Hours |        |
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|            |     |      | SCENARIOS TO ASSIST WITH FORMULATION OF ORAL ARGUMENTS. (TIME ALREADY SPLIT WITH 1287.558)                                                                                                                                                                                                                                                                                                       | 0.40  | 70.00  |
|            | JWS | L230 | A101 PLAN AND PREPARE FOR (CONTINUE) ORAL ARGUMENTS ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT, FORMULATION OF ADDITIONAL ARGUMENTS IN SUPPORT OF RELIEF SOUGHT<br>[REDACTED]<br>(TIME ALREADY SPLIT WITH 1287.558)                                                                                                                                                                                | 0.45  | 78.75  |
| 06/20/2017 | JWS | L230 | A101 PLAN AND PREPARE FOR (CONTINUE) HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT, MORE SPECIFICALLY, STATUTORY ARGUMENTS RE: [REDACTED]<br>(TIME SPLIT WITH 1287.558)                                                                                                                                                                                                                       | 0.15  | 26.25  |
|            | JWS | L230 | A109 APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL TIME IN ENTRY. (TIME ALREADY SPLIT WITH 1287.558)                                                                                                                                                                                                                                              | 0.65  | 113.75 |
|            | JWS | L230 | A109 APPEAR FOR/ATTEND (NO CHARGE) TRAVEL TIME TO HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT.                                                                                                                                                                                                                                                                                              | 0.50  | n/c    |
|            | JWS | L230 | A103 DRAFT/REVISE SUMMARY RE: ORAL ARGUMENTS/COURT'S ANALYSIS ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT. (TIME ALREADY SPLIT BETWEEN 1287.558)                                                                                                                                                                                                                                                    | 0.10  | 17.50  |
|            | JWS | L230 | A103 DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT BETWEEN 1287.558)                                                                                                                                                                                                                                                                                         | 0.05  | 8.75   |
|            | PCB | L240 | A101 PLAN AND PREPARE (FINAL) FOR TODAY'S HEARING ON MOTION SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT RE: CONTINUE TO GO OVER ALL CASES CITED BY THE HOA, CONTINUE TO DRAFT ORAL ARGUMENT, CONTINUE TO IDENTIFY SPECIFIC SECTIONS OF THE VARIOUS EXHIBITS TO USE DURING ORAL ARGUMENT AND PRACTICE ORAL ARGUMENT (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 1.70  | 297.50 |
|            | PCB | L240 | A109 APPEAR FOR/ATTEND HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT (NO TRAVEL TIME INCLUDED IN THIS ENTRY; TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.588 - TOWER II).                                                                                                                                                                           | 1.30  | 227.50 |
| 06/21/2017 | JWS | L120 | A104 REVIEW/ANALYZE CORRESPONDENCE FROM HOA TO THE SPECIAL MASTER RE: PROPOSED STAY OF DISCOVERY/BASIS FOR THE SAME.                                                                                                                                                                                                                                                                             | 0.05  | 8.75   |
| 06/22/2017 | PCB | L120 | A103 DRAFT/REVISE EMAILS TO CARRIERS RE: [REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).                                                                                                                                                                                                                                                            | 0.20  | 35.00  |
|            | JWS | L120 | A103 DRAFT/REVISE UPDATED SUMMARY TO CARRIER, RE: [REDACTED]                                                                                                                                                                                                                                                                                                                                     | 0.05  | 8.75   |

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| 06/23/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE AND RECOMMENDATION AND ORDER FROM THE SPECIAL MASTER HOLDING DISCOVERY IN ABEYANCE IN ORDER TO DETERMINE RELEVANCY AND ENSURE COMPLIANCE. | 0.05 8.75 |
| 06/26/2017 | JWS | L320 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM OWNER OF SILVERSTAR RE: DOCUMENT SUBPOENA/SCOPE OF WORK AT PROJECT. | 0.05 8.75 |
| 06/28/2017 | PCB | L210 | A104 | REVIEW/ANALYZE THE HOA'S REQUEST TO EXTEND THE TIME FOR SERVICE OF THE COUNTER-CLAIM, CALCULATE WHEN THE DEADLINE EXPIRES, CONTACT COUNSEL FOR THE HOA TO DISCUSS THAT THE COUNTER-CLAIM SHOULD HAVE BEEN A THIRD-PARTY CLAIM AS TO THE SUBCONTRACTORS, AND TELL THEM THAT BWB&O CANNOT AGREE TO THE REQUESTED EXTENSION BECAUSE BWB&O DOES NOT REPRESENT THOSE OTHER PARTIES (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.20 35.00 |
| | JWS | L210 | A104 | REVIEW/ANALYZE CORRESPONDENCE, NOTES AND COURT MINUTES IN PREPARATION FOR ANTICIPATED EMERGENCY HEARING AT REQUEST OF HOA ON SERVICE OF PLEADINGS. | 0.20 35.00 |
| 06/30/2017 | JWS | L210 | A104 | REVIEW/ANALYZE COURT FILINGS RE: DEAN ROOFING, 5 STAR PLUMBING, FLIPPINS TRENCHING, FORD CONTRACTING AND SIERRA GLASS AND MIRROR IN ORDER TO DETERMINE RELEVANCY AND ASSIST WITH FURTHER CASE HANDLING. TIME SPLIT WITH PANORAMA II FILE. | 0.05 8.75 |
| 07/07/2017 | PCB | L210 | A104 | REVIEW/ANALYZE EMAIL FROM THE RISK MANAGER FOR BOMBARD MECHANICAL, ASSESS HOW TO ADDRESS HER QUESTIONS, AND PREPARE EMAIL BACK DISCUSSING THE OVERALL STATUS OF THE CASE AND WHY THE CLAIM AGAINST BOMBARD MIGHT BECOME MOOT (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II). | 0.10 17.50 |
| 07/09/2017 | PCB | L210 | A103 | DRAFT/REVISE EMAIL TO COUNSEL FOR THE HOA RE: SUGGESTED WAY TO DEAL WITH THE CLAIMS AGAINST THE SUBCONTRACTORS SINCE JUDGE JOHNSON HAS YET TO RULE ON THE MOST RECENT MOTION FOR PARTIAL SUMMARY JUDGMENT/DECLARATORY RELIEF (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II). | 0.05 8.75 |
| 07/10/2017 | PCB | L190 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH RISK MANAGER FOR BOMBARD MECHANICAL RE: DISCUSSION OF ALL THE ISSUES SURROUNDING THE RECENT MOTION PRACTICE, WHETHER THERE IS A POSSIBILITY THAT THE COURT WILL DISMISS THE CLAIMS PERTAINING TO BOMBARD, POTENTIAL EXPOSURE FOR BOMBARD, AND NOTICE TO PRODUCT MANUFACTURERS. | 0.15 26.25 |
| | PCB | L210 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA ON THE REASONS WHY HE SHOULD AGREE TO GIVE EXTENSIONS OF TIME TO THE SUBCONTRACTORS TO RESPOND TO HIS CLIENT'S PLEADING, AND SEND EMAIL TO | |

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| | | | THE CARRIER CONTACTS AND TO THE RISK MANAGER FOR BOMBARD MECHANICAL INFORMING THEM OF OPPOSING COUNSEL'S AGREEMENT TO THE PROPOSED EXTENSION. | 0.10 | 17.50 |
| 07/16/2017 | JWS | L210 | A104 REVIEW/ANALYZE CORRESPONDENCE/NOTES, AND PROCEDURAL HISTORY IN PREPARATION OF OPPOSITION TO THE ASSOCIATION'S MOTION TO ENLARGE TIME TO SERVE COUNTER-DEFENDANTS. TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER. | 0.40 | 140.00 |
| | JWS | L210 | A104 REVIEW/ANALYZE (LIMITED RESEARCH) O STATUTES, CASE LAW CITED IN THE ASSOCIATION'S MOTION TO ENLARGE IN PREPARATION OF THE CLIENT'S OPPOSITION TO THE SAME. TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER. | 0.70 | 122.50 |
| | JWS | L210 | A103 DRAFT/REVISE (BEGIN) AFFIDAVIT OF PETER BROW IN SUPPORT OF CLIENT'S OPPOSITION TO THE ASSOCIATION'S MOTION FOR ENLARGEMENT OF TIME. | 0.10 | 17.50 |
| | JWS | L210 | A103 DRAFT/REVISE (BEGIN) OPPOSITION TO THE ASSOCIATION'S MOTION TO ENLARGE TIME TO SERVE COUNTER-DEFENDANTS, RE: PROCEDURAL HISTORY, FACTS, LEGAL STANDARDS AND CASE LAW, E.G., NRCP(4) AND SCRIMER, ARGUMENTS AND PRAYER FOR RELIEF. (TIME SPLIT WITH 1287.558 AT REQUEST OF ADJUSTER.) | 1.70 | 297.50 |
| 07/17/2017 | JWS | L210 | A103 DRAFT/REVISE (SUPPLEMENTED) OPPOSITION TO MOTION TO AMEND TO ADDRESS AMENDMENTS TO PLEADINGS, AND CLIENTS' RESERVATION TO OBJECT TO SAME AND ALSO TO CHALLENGE VALIDITY OF COUNTER-CLAIM. | 0.20 | 35.00 |
| | PCB | L250 | A103 DRAFT/REVISE (FINALIZE) OPPOSITION TO MOTION TO ENLARGE TIME TO SERVE COUNTER-CLAIM RE: ADDITIONAL ARGUMENTS DEALING WITH THE INVALIDITY OF THE COUNTER-CLAIM AS TO THE PARTIES THE HOA IS SEEKING TO SERVE WITH THE COUNTER-CLAIM, ADDITIONAL ARGUMENTS AS TO THE LACK OF JUSTIFICATION FOR THE ADDITIONAL TIME BEING REQUESTED, AND ADDITIONAL ARGUMENTS AS TO THE PREJUDICE THAT WILL OCCUR SHOULD THE COURT GRANT THE HOA'S REQUEST (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.40 | 70.00 |
| 07/26/2017 | PCB | L210 | A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR ONE OF THE SUBCONTRACTORS RE: DISCUSSION OF THE CURRENT STATUS OF THE COURT'S RULING ON THE MOST RECENT ROUND OF MOTION PRACTICE, AND WHETHER HER CLIENT NEEDS TO FILE A RESPONSIVE PLEADING AT THIS TIME TO THE HOA'S PLEADING (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.05 | 8.75 |
| 07/27/2017 | JWS | L120 | A108 COMMUNICATE (OTHER EXTERNAL) ADJUSTER WITH WESTERN NATIONAL X 2 ON BEHALF OF PLUMBING/SEWER SUBCONTRACTOR RE: CASE ACTIVITY, SPLIT WITH TOWER TWO CASE PER ADJUSTER. | 0.30 | 52.50 |
| | JWS | L210 | A104 REVIEW/ANALYZE AND OUTLINE HOA'S REPLY TO CLIENT'S OPPOSITION TO MOTION TO ENLARGE SERVICE ON DEFENDANTS. SPLIT WITH TOWER TWO CASE PER | | |

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| ADJUSTER. | | | | 0.20 | 35.00 |
| 07/31/2017 | JWS | L230 | A101 | PLAN AND PREPARE FOR, ASSIST HANDLING PARTNER WITH PREPRATION FOR HEARING ON THE ASSOCIATIONS MOTION TO SERVE REMAINING PARTIES, INCLUDED REVIEW/IDENTIFCATION OF MATERIAL AND EXHIBITS NEEDED FOR ORAL ARGUMENTS. | 0.30 52.50 |
| 08/01/2017 | PCB | L250 | A104 | REVIEW/ANALYZE PLEADINGS RELATED TO THE HOA'S REQUEST TO EXTEND THE TIME TO SERVE THE COUNTER-CLAIM AND OUTLINE ORAL ARGUMENTS TO BE USED DURING HEARING, [REDACTED] | |
| | | | | (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1297.558 - TOWER II). | 0.40 70.00 |
| | PCB | L250 | A109 | APPEAR FOR/ATTEND HEARING ON HOA'S MOTION TO EXTEND THE TIME TO SERVE THE COUNTER-CLAIM (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II; NO TRAVEL TIME INCLUDED IN THIS ENTRY). | 0.70 122.50 |
| | PCB | L250 | A103 | DRAFT/REVISE PROPOSED ORDER DENYING THE HOA'S MOTION TO ENLARGE TIME (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.05 8.75 |
| 08/09/2017 | JWS | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA, MEET AND CONFER RE: PENDING MOTIONS BEFORE JUDGE, NO RULING TO DATE, IMPLICATIONS, AND NEED FOR FOLLOW-UP WITH SPECIAL MASTER. TIME SPLIT WITH TOWER TWO FILE PER ADJUSTER. | 0.10 17.50 |
| | JWS | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: CASE STATUS, PENDING RULING FROM JUDGE, AND REQUEST TO CONTINUE HEARING. | 0.10 17.50 |
| | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE/RESPONSE FROM SPECIAL MASTER HALE RE: STATUS UPDATE/REQUEST TO CONTINUE HEARING. | 0.05 8.75 |
| 08/10/2017 | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: UPCOMING STATUS CHECK HEARING, NEED TO MOVE FORWARD WITH THE SAME. | 0.05 8.75 |
| | JWS | L230 | A103 | DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE, MEET AND CONFER RE: BASIS FOR CONTINUATION OF HEARING BASED ON PROCEDURAL POSTURE OF CASE. | 0.10 17.50 |
| | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: APPROVAL OF REQUEST TO CONTINUE HEARING BASED ON PROCEDURAL POSTURE OF CASE. | 0.05 8.75 |
| 08/24/2017 | JWS | L210 | A104 | REVIEW/ANALYZE (BEGIN) ASSOCIATIONS MOTION TO ENLARGE TIME TO SERVE/AMEND PLEADINGS WITH BACK UP, 59 PAGES TOTAL IN ORDER TO DETERMINE FURTHER COURSE OF ACTION, AND POSSIBLE OPPOSITION. | 0.20 35.00 |
| For Current Services Rendered | | | | 45.62 | 7,123.67 |
| Total Non-billable Hours | | | | 2.40 | |

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## Recapitulation

| <u>Timekeeper</u>        | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|--------------------------|--------------|--------------|-------------|--------------|
| Peter C. Brown           | PARTNER      | 7.85         | \$175.38    | \$1,376.75   |
| Jeffrey W. Saab          | ASSOCIATE    | 7.90         | 183.86      | 1,452.50     |
| Jennifer Vela            | PARALEGAL    | 0.75         | 95.00       | 71.25        |
| Darlene M. Cartier       | ASSOCIATE    | 18.87        | 170.53      | 3,217.92     |
| Rochelle A. Harding-Roed | ASSOCIATE    | 0.45         | 165.00      | 74.25        |
| Michelle Dowling         | PARALEGAL    | 9.80         | 95.00       | 931.00       |

## Expenses

|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |       |
|------------|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| 03/02/2017 | L100 | E109 | LOCAL TRAVEL (8799) DARLENE M. CARTIER (TO AND FROM SPECIAL MASTER HEARING) (30 MILES AT 0.535/MILE- SPIT WITH OTHER CLAIM 558)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 4.02  |
| 03/20/2017 | L100 | E112 | WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S, AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)                                                              | 52.38 |
| 03/30/2017 | L100 | E102 | OUTSIDE PRINTING (CLARK COUNTY'S RECORDERS OFFICE DOCUMENTS) (SPLIT BETWEEN 1287.551/558 AND 1246.005)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2.76  |
| 03/30/2017 | L100 | E123 | OTHER PROFESSIONALS (2407) PAUL A. ACKER (DOCUMENTS FROM CLARK COUNTY RECORDER'S OFFICE)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2.07  |
| 03/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR MARCH 2017 (800 PAGES AT .08/PAGE)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 32.00 |
| 04/04/2017 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) | 1.75  |
| 04/04/2017 | L100 | E112 | WIZ-NET (STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAUREN HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF)                    | 1.75  |

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| | | | | |
|------------|------|------|---|-------|
| 04/30/2017 | L100 | E101 | REPRODUCTION COSTS FOR APRIL 2017 (209 PAGES AT .08/PAGE) | 8.36 |
| 05/01/2017 | L100 | E113 | SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010107 SUBPOENA DUCES TECUM & NOTICE - SOUTHERN NEVADA HEALTH DISTRICT, LAS VEGAS / SERVICES RENDERED ON 4/24/17)(SPLIT WITH 1287.558) | 15.47 |
| 05/10/2017 | L100 | E112 | WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEZZ, LLC'S AND IN SUPPORT OF M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) | 1.75 |
| 05/16/2017 | L100 | E112 | ODYSSEY (RE-NOTICE OF HEARING ON PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER CLAIM AND PLAINTIFFS/COUNTER DEFENDANTS LAURENT HALLIER'S PANORAMA TOWERS I, LLC'S. PANORAMA TOWERS I MEZZ, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) | 1.75 |
| 05/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR MAY 2017 (1194 PAGES AT .08/PAGE) | 47.76 |
| 06/01/2017 | L100 | E112 | ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 FILING FEE: ADR COMMISSIONER OFFICE / SERVICES PROVIDED ON 5/10/17) | 26.70 |
| 06/01/2017 | L100 | E112 | ATTORNEY SERVICE (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO ISSUE A CHECK - SOUTHERN NEVADA HEALTH DISTRICT / SERVICES PROVIDED ON 5/10/17) | 22.34 |
| 06/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/11/17) | 2.88 |
| 06/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/12/17) | 2.88 |
| 06/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010568 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 05/22/2017) | 2.88 |
| 06/14/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF ORDER RE: OBJECTION TO COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL) | 1.75 |
| 06/20/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (COURT PARKING, SPLIT WITH 1287.558) | 3.75 |
| 06/30/2017 | L100 | E101 | REPRODUCTION COSTS FOR JUNE 2017 (319 PAGES AT 0.08/PAGE) | 12.76 |
| 07/17/2017 | L100 | E112 | ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS 1 MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S MOTION TO ENLARGE TIME) | 1.75 |
| 07/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR JULY 2017 (96 PAGES AT .08/PAGE) | 3.84 |
| 08/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37011415 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES | |

CHUBB INSURANCE

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|            |      |      |                                                                                                                                                |             |
|------------|------|------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|            |      |      | PROVIDED ON 07/18/2017)                                                                                                                        | 2.88        |
| 08/01/2017 | L100 | E109 | LOCAL TRAVEL (134) PETER C. BROWN (PARKING) (SPLIT WITH ONE OTHER FILE)                                                                        | 2.25        |
| 08/03/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37011682 FILING - EIGHTH JUDICIAL DISTRICT COURT)                                   | 2.88        |
| 08/07/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO ENLARGE TIME FOR SERVICE) | 1.75        |
| 08/07/2017 | L100 | E112 | ODYSSEY (ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO ENLARGE TIME FOR SERVICE)                    | 1.75        |
| 08/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR AUGUST 2017 (228 PAGES AT .08/PAGE)                                                                                     | 9.12        |
|            |      |      | Total Expenses                                                                                                                                 | 273.98      |
|            |      |      | Total Current Work                                                                                                                             | 7,397.65    |
|            |      |      | Previous Balance                                                                                                                               | \$17,025.63 |

Payments

|            |  |  |                                                                     |                           |
|------------|--|--|---------------------------------------------------------------------|---------------------------|
| 04/18/2017 |  |  | PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616732 / STMT #8) | -5,787.14                 |
| 04/18/2017 |  |  | PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616733 / STMT #7) | -7,697.47                 |
| 04/18/2017 |  |  | PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616731 / STMT #9) | -9,360.14                 |
| 04/20/2017 |  |  | PAYMENT RECEIVED - THANK YOU (ESIS - CHECK NO FA78616746 / STMT #7) | -7,146.72                 |
|            |  |  | Total Payments                                                      | -29,991.47                |
|            |  |  | Credit Balance                                                      | <u><u>-\$5,568.19</u></u> |

Split Billing Summary

|                                                | Fees      | Expenses | Advances | Total     |
|------------------------------------------------|-----------|----------|----------|-----------|
| CHUBB INSURANCE - Panorama Tower I             | 7,123.67  | 273.98   | 0.00     | 7,397.65  |
| ESIS Dallas AGL Claims (2) - Panorama Tower II | 6,747.33  | 273.89   | 0.00     | 7,021.22  |
|                                                | 13,871.00 | 547.87   | 0.00     | 14,418.87 |

Task Code Recapitulation

|      |                                                     | Fees     | Expenses |
|------|-----------------------------------------------------|----------|----------|
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 0.00     | 273.98   |
| L110 | FACT INVESTIGATION/DEVELOPMENT                      | 17.50    | 0.00     |
| L120 | ANALYSIS/STRATEGY                                   | 1362.41  | 0.00     |
| L160 | SETTLEMENT/NON-BINDING ADR                          | 66.00    | 0.00     |
| L190 | OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 70.00    | 0.00     |
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 1,515.91 | 273.98   |
| L210 | PLEADINGS                                           | 865.25   | 0.00     |
| L230 | COURT MANDATED CONFERENCES                          | 656.26   | 0.00     |
| L240 | DISPOSITIVE MOTIONS                                 | 2722.50  | 0.00     |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS               | 332.00   | 0.00     |

CHUBB INSURANCE

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| | | <u>Fees</u> | <u>Expenses</u> |
|------|---------------------------------|-------------|-----------------|
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS | 4,576.01 | 0.00 |
| L310 | WRITTEN DISCOVERY | 26.25 | 0.00 |
| L320 | DOCUMENT PRODUCTION | 977.75 | 0.00 |
| L350 | DISCOVERY MOTIONS | 27.75 | 0.00 |
| L300 | DISCOVERY | 1,031.75 | 0.00 |

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

Final Statement Run Totals 09/01/2017

| | |
|---------------------|----------|
| Statements Printed: | 1 |
| Hours: | 45.62 |
| Fees: | 7,123.67 |
| Expenses: | 273.98 |

BREMER, WHYTE, BROWN & O'MEARA, LLP
 20320 S.W. BIRCH STREET
 SECOND FLOOR
 NEWPORT BEACH, CA 92660
 (949) 221-1000

TAX ID # 33-0747275

ESIS Dallas AGL Claims
 P.O. Box 5127
 Scranton, PA 18505
 USA

Attn: Sherilyn Brydon

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 PANORAMA TOWER II

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| <u>Fees</u> | | | | | Hours | |
|-------------|-----|------|------|---|-------|--------|
| 09/08/2017 | JWS | L210 | A104 | REVIEW/ANALYZE AND OUTLINE ARGUMENTS IN MOTION TO AMEND PLEADINGS IN PREPRATION OF DRAFTING OPPOSITION TO THE SAME. SPLIT WITH TOWER TWO FILE PER ADJUSTER | 0.20 | 35.00 |
| | JWS | L210 | A104 | REVIEW/ANALYZE LIMITED LEGAL RESEARCH ON GOOD CAUSE, GOOD FAITH, AND ELEMENTS FOR AMENDMENTS TO PLEADINGS IN PREPARATION OF OPPOSITION TO THE SAME. SPLIT TIME WITH TOWER TWO CASE. | 0.30 | 52.50 |
| | JWS | L210 | A103 | DRAFT/REVISE (BEGIN) OPPOSITION TO THE ASSOCIATION'S MOTION TO AMEND PLEADINGS, FACTS, AFFIDAVIT, ARGUMENTS, AND PRAYER FOR RELIEF. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.90 | 157.50 |
| | JWS | L210 | A104 | REVIEW/ANALYZE (BEGIN) AND COMPARE PROPOSED AMENDED PLEADINGS SUBMITTED IN SUPPORT OF MOTION TO AMEND AGAINST CURRENT PLEADINGS TO ASSIST WITH OPPOSITION. TIME TO BE SPLIT WITH TOWER II CASE PER ADJUSTER. | 0.30 | 52.50 |
| 09/11/2017 | PCB | L250 | A103 | DRAFT/REVISE (FINALIZE) OPPOSITION TO THE HOA'S RENEWED MOTION TO AMEND AND TO ENLARGE TIME TO SERVE SUBCONTRACTORS RE: ADDITIONAL DISCUSSION OF WHAT OCCURRED AT THE LAST HEARING ON THIS SAME TOPIC, HOW THE HOA IS FORGETTING THE COURT'S COMMENTS ABOUT WAITING FOR THE COURT'S RULING ON THE MOTION FOR SUMMARY JUDGMENT, AND RESERVING ARGUMENTS AS TO THE TIMING OF ANY AMENDMENTS TO THE THIRD-PARTY COMPLAINT THAT IS BEING PROPOSED BY COUNSEL FOR THE HOA (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.15 | 26.25 |
| 09/12/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM WESTERN NATIONAL ADJUSTER LORALEE THATCHER IN PREPRATION OF RESPONDING TO THE SAME RE: CASE ACTIVITY. SPLIT TIME WITH TOWER II CASE PER ADJUSTER. | 0.05 | 8.75 |
| | JWS | L120 | A104 | REVIEW/ANALYZE (LIMITED SCOPE) CORRESPONDENCE/MOTES TO ASSIST WITH RESPONDING TO WESTERN NATIONAL ADJUSTER, LORALEE THATCHER. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.10 | 17.50 |

Panorama Tower II
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 PANORAMA TOWER II

| | | | | Hours | |
|------------|-----|------|------|---|-------------|
| | JWS | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH WESTERN NATIONAL ADJUSTER, LORALEE THATCHER, MEET AND CONFER RE: CASE ACTIVITY/STATUS OF TENDER/RESPONSE TO SAME. PER ADJUSTER, TIME SPLIT WITH TOWER II CASE. | 0.05 8.75 |
| 09/18/2017 | JWS | L240 | A104 | REVIEW/ANALYZE AND OUTLINE, 20 PAGES, COURT'S FINDINGS OF FACT, CONCLUSIONS OF LAW WITH RESPECT TO CLIENTS' MOTION FOR SUMMARY JUDGMENT. TIME TO BE SPLIT WITH TOWER II CASE. | 0.15 26.25 |
| | PCB | L240 | A104 | REVIEW/ANALYZE COURT'S 20 PAGE RULING ON MOTION FOR SUMMARY JUDGMENT IN ORDER TO BE ABLE TO REPORT ON THE RULING TO CLIENTS AND TO THE CARRIER (AS PER ADJUSTER REQUEST, TIME SPLIT WITH OTHER FILE DEALING WITH TOWER II). | 0.20 35.00 |
| | PCB | L240 | A106 | COMMUNICATE (WITH CLIENT) WITH RISK MANAGER FOR BOMBARD MECHANICAL RE: DISCUSSION OF THE COURT'S RULING ON THE MOTION FOR SUMMARY JUDGMENT AND WHY IT IS ESPECIALLY GOOD FOR BOMBARD MECHANICAL (AS PER REQUEST OF ADJUSTER, TIME SPLIT WITH OTHER FILE DEALING WITH TOWER II). | 0.10 17.50 |
| 09/19/2017 | JWS | L230 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: FEBRUARY 22, 2018 SPECIAL MASTER HEARING. PER ADJUSTER, TIME TO BE SPLIT WITH TOWER II CASE. | 0.05 8.75 |
| 09/25/2017 | JWS | L240 | A103 | DRAFT/REVISE ENTRY OF ORDER RE: CLIENTS' MOTION FOR SUMMARY JUDGMENT. | 0.05 8.75 |
| 09/27/2017 | PCB | L120 | A104 | REVIEW/ANALYZE THE ORDER FROM THE COURT ON THE CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT, IN CONJUNCTION WITH ANALYSIS OF WHAT MIGHT BE GROUNDS FOR RECONSIDERATION OF THE ORDER BY THE HOA, AND PREPARE SUPPLEMENTAL STATUS REPORT TO CARRIER
[REDACTED]
[REDACTED]
[REDACTED]
(AS PER CARRIER REQUEST - TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). | 0.60 105.00 |
| | PCB | L120 | A104 | REVIEW/ANALYZE ORIGINAL CC&RS [REDACTED]
[REDACTED]
[REDACTED]
(AS PER CARRIER REQUEST, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). | 0.10 17.50 |
| 09/28/2017 | JWS | L230 | A104 | REVIEW/ANALYZE/OUTLINE (BEGIN) TRANSCRIPT FROM HEARING ON MOTION TO ENLARGE TIME FOR SERVICE/OPPOSITION TO SAME, IN ORDER TO ASSIST WITH UPCOMING HEARING ON MOTION TO AMEND. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.10 17.50 |

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PANORAMA TOWER II

| | | | | Hours | |
|------------|-----|------|------|---|------------|
| 09/29/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM PLAINTIFF'S COUNSEL RE: PENDING MOTION, STAY OF CASE IN ORDER TO DETERMINE RELEVANCY. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.05 8.75 |
| 10/02/2017 | PCB | L120 | A104 | REVIEW/ANALYZE (CONTINUE) AVAILABLE PROJECT INFORMATION TO ASSESS WHAT CLAIMS COULD SURVIVE IF WE WERE TO TAKE AN AGGRESSIVE POSITION ON THE COURT'S ORDER FOR THE MOTION FOR SUMMARY JUDGMENT/MOTION FOR PARTIAL SUMMARY JUDGMENT, [REDACTED] (AS PER CARRIER REQUEST - TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). | 0.20 35.00 |
| 10/03/2017 | JWS | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE: [REDACTED] | 0.10 17.50 |
| 10/04/2017 | JWS | L340 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT WITH MKA, [REDACTED] | 0.05 8.75 |
| | JBV | L320 | A104 | REVIEW/ANALYZE AND COMPILE FOUR VERSIONS OF THE PANORAMA TOWERS COVENANTS, CONDITIONS & RESTRICTIONS, RE: VERIFYING EACH IS COMPLETE, IN PREPARATION FOR PROVIDING CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES [REDACTED] PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.10 9.50 |
| | JBV | L320 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED] AS REQUESTED BY ATTORNEY, PRIOR TO UPCOMING MEETING. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.05 4.75 |
| | JBV | L320 | A103 | DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED] | 0.05 4.75 |
| 10/05/2017 | JWS | L340 | A101 | PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERT, MKA, RE: [REDACTED] PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.30 52.50 |
| | JWS | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE: [REDACTED] PER ADJUSTER TIME TO BE SPLIT WITH OTHER TOWER CASE. | 0.15 26.25 |

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 PANORAMA TOWER II

| | | | | | Hours | |
|------------|-----|------|------|---|-------|-------|
| | JWS | L340 | A104 | REVIEW/ANALYZE PRESENTATION PREPARED BY MKA RE: WIDOWS AND FIRE-BLOCKING TO ASSIST WITH FURTHER EVALUATION AS TO POTENTIAL MOTION ON STANDING. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.20 | 35.00 |
| 10/11/2017 | PCB | L250 | A104 | REVIEW/ANALYZE PLAINTIFF'S MOTION FOR CLARIFICATION ON THE SEWER ALLEGATION AND THE FIRE BLOCKING ALLEGATION IN ORDER TO BEGIN ASSESSMENT OF POSSIBLE RESPONSE TO SAME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). | 0.10 | 17.50 |
| 10/18/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM ADJUSTER, LORALEE THATCHER, RE: TENDER/CASE ACTIVITY IN PREPARATION OF RESPONDING TO THE SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.05 | 8.75 |
| 10/25/2017 | PCB | L250 | A101 | PLAN AND PREPARE (BEGIN) FOR OPPOSITION TO THE HOA'S MOTION FOR CLARIFICATION OF THE COURT ORDER REGARDING PANORAMA'S MOTION FOR PARTIAL SUMMARY JUDGMENT RE: SET OUT BASIC ARGUMENTS WITH REGARD TO THE HOA'S CONTENTION THAT THE COURT ORDER IS UNCLEAR AS TO THE SEWER ISSUE AND UNCLEAR AS TO HOW EXTENSIVE THE INSPECTION MUST BE PERFORMED WITH REGARD TO THE FIRE BLOCKING ISSUE (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). | 0.20 | 35.00 |
| | PCB | L240 | A104 | REVIEW/ANALYZE (BEGIN) AVAILABLE INFORMATION AND COMPARE SAME TO MOTIONS FILED IN OTHER CASES DEALING WITH AB 125 [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). | 0.10 | 17.50 |
| | JWS | L240 | A104 | REVIEW/ANALYZE AND OUTLINE MOTION FOR RECONSIDERATION WITH BACK UP IN PREPARATION OF OPPOSITION TO THE SAME. PER ADJUSTER, SPLIT WITH TOWER II FILE. | 0.25 | 43.75 |
| | JWS | L240 | A101 | PLAN AND PREPARE FOR (BEGIN) STRATEGY FOR OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION OF COURT'S ORDER. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.20 | 35.00 |
| 10/26/2017 | JWS | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM ADJUSTER, LORALEE THATCHER RE: TENDER, STATUS OF CASE, THEN REPLIED TO SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. | 0.05 | 8.75 |
| | JWS | L240 | A104 | REVIEW/ANALYZE ATTORNEY NOTES, CORRESPONDENCE, COURT FILINGS AND MINUTE ORDER TO ASSIST WITH OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.25 | 43.75 |
| | JWS | L240 | A103 | DRAFT/REVISE (BEGIN) OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION. FACTS, PROCEDURAL | | |

Panorama Tower II
 5143220827859X-A
 PANORAMA TOWER II

| | | | | Hours | |
|------------|-----|------|--|-------|--------|
| | | | SUMMARY, LEGAL STANDARD AND INITIAL ARGUMENT. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.85 | 148.75 |
| 10/27/2017 | JWS | L240 | A103 DRAFT/REVISE (SUPPLEMENTED) OPPOSITION TO MOTION FOR CLARIFICATION RE: FIRE BLOCKING ARGUMENT.PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.15 | 26.25 |
| | JWS | L240 | A108 COMMUNICATE (OTHER EXTERNAL) WITH SHELLY FROM MKA, [REDACTED] | 0.10 | 17.50 |
| | PCB | L130 | A108 COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS (EXPERT) RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF THE CARRIER). | 0.20 | 35.00 |
| | PCB | L250 | A104 REVIEW/ANALYZE PORTIONS OF THE CLIENTS' ORIGINAL MOTION FOR SUMMARY JUDGMENT, THE ASSOCIATION'S OPPOSITION TO SAME, AND THE CLIENTS' REPLY BRIEF IN ORDER TO PULL OUT SPECIFIC SECTIONS OF THOSE PLEADINGS TO USE TO CONTINUE PREPARATION OF THE CLIENTS' OPPOSITION TO THE ASSOCIATIONS' MOTION FOR CLARIFICATION OF THE COURT'S ORDER RE: USING THIS INFORMATION TO PROVE TO THE COURT THAT THE ASSOCIATION'S MOTION IS ACTUALLY AN IMPROPER MOTION FOR RECONSIDERATION WITH REGARD TO THE FIRE BLOCKING ALLEGATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF THE CARRIER). | 0.60 | 105.00 |
| | JWS | L350 | A108 COMMUNICATE (OTHER EXTERNAL) INITIAL CALL WITH EXPERT MKA, [REDACTED] | 0.10 | 17.50 |
| | JWS | L350 | A104 REVIEW/ANALYZE PLANS FOR BOTH TOWERS 1 AND 2 AS [REDACTED] PREPARATION OF FURTHER DISCUSSION. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.15 | 26.25 |
| | JWS | L350 | A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH EXPERT, MEET AND CONFER RE: [REDACTED]
[REDACTED] ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.15 | 26.25 |
| | JWS | L350 | A107 COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH OPPOSING COUNSEL X2 MEET AND CONFER RE: MOVING UPCOMING HEARING ON MOTION FOR CLARIFICATION, BASIS FOR SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.05 | 8.75 |
| 10/30/2017 | JWS | L120 | A108 COMMUNICATE (OTHER EXTERNAL) WITH OPPOSING COUNSEL, MEET AND CONFER RE: MOTION FOR CLARIFICATION. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.05 | 8.75 |

Panorama Tower II
 5143220827859X-A
 PANORAMA TOWER II

| | | | | | Hours | |
|------------|-----|------|------|--|-------|-------|
| 10/31/2017 | JWS | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH FRANCIS LYNCH, FURTHER DISCUSSION RE: MOTION FOR CLARIFICATION/HEARING AS TO SAME. | 0.10 | 17.50 |
| | JWS | L120 | A103 | DRAFT/REVISE PROPOSED STIPULATION AND ORDER TO CONTINUE HOA'S HEARING ON MOTION FOR CLARIFICATION. SPLIT TIME WITH SECOND TOWER CASE. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.10 | 17.50 |
| | JWS | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) FOLLOW-UP WITH FRANCIS LYNCH X 2 RE: PROPOSED STIPULATION AND ORDER RE: HEARING ON HOA'S MOTION FOR CLARIFICATION. SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. | 0.10 | 17.50 |
| | JWS | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE: [REDACTED] SPLIT TIME WITH TOWER TWO CASE. | 0.10 | 17.50 |
| | JWS | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE: [REDACTED], SPLIT TIME WITH SECOND TOWER FILE. | 0.10 | 17.50 |
| 11/01/2017 | JWS | L120 | A101 | PLAN AND PREPARE FOR (BEGIN) CALL WITH EXPERT, MKA, [REDACTED] SPLIT TIME WITH TOWER 2 CASE. | 0.30 | 52.50 |
| | JWS | L120 | A108 | COMMUNICATE (OTHER EXTERNAL), TWO CALLS WITH MKA, [REDACTED] SPLIT TIME WITH TOWER 2 CASE. | 0.35 | 61.25 |
| | JWS | L120 | A103 | DRAFT/REVISE SUMMARY OF CALL WITH EXPERT [REDACTED] SPLIT TIME WITH TOWER TWO CASE. | 0.15 | 26.25 |
| 11/02/2017 | JWS | L120 | A101 | PLAN AND PREPARE FOR EXPERT MEETING WITH MKA, [REDACTED] SPLIT WITH TOWER 2 CASE. | 0.45 | 78.75 |
| | JWS | L120 | A109 | APPEAR FOR/ATTEND CONFERENCE CALL WITH EXPERT MKA, [REDACTED] SPLIT TIME WITH TOWER 2 CASE. | 0.15 | 26.25 |
| | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM COURT RE: STIPULATION AND HEARING ON MOTION FOR CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.. | 0.05 | 8.75 |
| | JWS | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH PLAINTIFF'S COUNSEL X 3, MEET AND CONFER RE: PROPOSED/REVISED STIPULATION AS TO MOTION FOR CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.15 | 26.25 |
| | JWS | L120 | A103 | DRAFT/REVISE PROPOSED/REVISED STIPULATION AND ORDER RE: MOTION FOR CLARIFICATION IN ACCORDANCE WITH DIRECTIVE FROM JUDGE JOHNSON. PER ADJUSTER | | |

| | | | | | | |
|------------|-----|------|------|--|---------------|--------|
| | | | | REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | Hours
0.15 | 26.25 |
| 11/03/2017 | JWS | L120 | A103 | DRAFT/REVISE (BEGIN) SUMMARY OF EXPERT ANALYSIS RE:
[REDACTED] SPLIT TIME WITH
SECOND TOWER FILE. | 0.20 | 35.00 |
| | JWS | L230 | A101 | PLAN AND PREPARE FOR (BEGIN) MANDATORY CONSTRUCTION DEFECT SWEEPS WEEK HEARING TO DISCUSS CASE ACTIVITY/DISCOVERY AND TRIAL WITH JUDGE. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.30 | 52.50 |
| | PCB | L240 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC REGARDING IMPACT OF THE COURT'S RULING ON THE MECHANICAL ROOM DEFECTS AND PREPARE EMAIL IN RESPONSE TO SAME (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). | 0.05 | 8.75 |
| | PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH CLIENTS' EXPERT (MKA) RE: [REDACTED]
(TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF THE CARRIER). | 0.20 | 35.00 |
| 11/06/2017 | JWS | L230 | A101 | PLAN AND PREPARE FOR (FINALIZE) MANDATORY COURT STATUS CHECK RE: CASE ACTIVITY/DISCOVERY AND IN PREPARATION OF STATUS UPDATE TO COURT. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.15 | 26.25 |
| | JWS | L230 | A109 | APPEAR FOR/ATTEND MANDATORY COURT STATUS CHECK HEARING WITH ALL COUNSEL, RE: CASE ACTIVITY, PLEADINGS, DISCOVERY AND AGENDA MOVING FORWARD. NO TRAVEL TIME IN ENTRY. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE | 0.45 | 78.75 |
| | JWS | L230 | A103 | DRAFT/REVISE (BEGIN) SUMMARY OF MANDATORY COURT HEARING, AND JUDGE'S COMMENTS TO ASSIST WITH FURTHER CASE HANDLING. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.05 | 8.75 |
| 11/21/2017 | PCB | L250 | A104 | REVIEW/ANALYZE ALL PLEADINGS FILED RELATED TO THE HOA'S MOTION FOR CLARIFICATION OF THE COURT'S ORDER ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY JUDGMENT, FIND PORTIONS OF ORIGINAL PLEADINGS ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY JUDGMENT TO USE AS EXHIBITS, OUTLINE ORAL ARGUMENTS TO USE DURING THIS MORNING'S HEARING, AND PRACTICE ORAL ARGUMENTS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II). | 1.10 | 192.50 |
| | PCB | L250 | A109 | APPEAR FOR/ATTEND HEARING ON THE HOA'S MOTION FOR CLARIFICATION OF THE COURT'S ORDER ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY JUDGMENT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II; BOTH PCB AND JESS SAAB APPROVED TO ATTEND HEARING; PCB BILLED MORE TIME FOR ATTENDANCE AT HEARING BECAUSE JEFF SAAB WAS AT A HEARING IN ANOTHER MATTER AT THE BEGINNING OF THE HEARING IN THIS CASE; NO TRAVEL TIME INCLUDED IN THIS | | |

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 PANORAMA TOWER II

| | | | | | | |
|------------|-----|------|------|--|-------|----------|
| | | | | ENTRY). | Hours | |
| | JWS | L230 | A101 | PLAN AND PREPARE FOR (FINALIZE) HEARING ON HOA MOTION FOR CLARIFICATION, REVIEW/NOTES ON CHAPTER 40 DEFECT PACKET PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 1.60 | 280.00 |
| | JWS | L230 | A109 | APPEAR FOR/ATTEND HEARING ON HOA'S MOTION FOR CLARIFICATION OF COURT'S ORDER/ CLIENTS' OPPOSITION TO THE SAME. PARTIAL ATTENDANCE AT HEARING DUE TO OVERLAP WITH APPEARANCE IN A DIFFERENT MATTER. HOWEVER, PCB ATTENDED ENTIRE HEARING PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. | 0.20 | 35.00 |
| | | | | | 1.05 | 183.75 |
| 11/29/2017 | JWS | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH ADJUSTER FOR FLIPPINS TRENCHING, MEET AND CONFER RE: CASE ACTIVITY. PER ADJUSTER, SPLIT TIME WITH TOWER TWO FILE. | 0.10 | 17.50 |
| | JWS | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP, PER REQUEST OF ADJUSTER FOR FLIPPINS TRENCHING, RE: OUTCOME OF MOTION FOR SUMMARY JUDGEMENT, IMPLICATIONS OF THE SAME. | 0.10 | 17.50 |
| 11/30/2017 | JWS | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM LORALEE THATCHER RE: TENDER RESPONSE. | 0.05 | 8.75 |
| | | | | For Current Services Rendered | 16.10 | 2,801.50 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|--------------|-------------|--------------|
| Peter C. Brown | PARTNER | 5.50 | \$175.00 | \$962.50 |
| Jeffrey W. Saab | ASSOCIATE | 10.40 | 175.00 | 1,820.00 |
| Jennifer Vela | PARALEGAL | 0.20 | 95.00 | 19.00 |

Expenses

| | | | | |
|------------|------|------|--|------|
| 09/11/2017 | L100 | E112 | ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S MOTION TO AMEND PLEADINGS AND ENLARGE TIME FOR SERVICES) | 1.75 |
| 09/12/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012091 FILING - EIGHTH JUDICIAL DISTRICT COURT) | 2.87 |
| 09/25/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF ORDER AS TO PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEXX, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S COUNTER-CLAIM AND PLAINTIFFS/COUNTER/DEFENDANTS, LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S PANORAMA TOWERS I MEXX, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CHILD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) | 1.75 |
| 09/30/2017 | L100 | E101 | REPRODUCTION COSTS FOR SEPTEMBER 2017 (13 PAGES AT | |

Panorama Tower II
5143220827859X-A
PANORAMA TOWER II

| | | | | |
|------------|------|------|--|-------------------|
| | | | .08/PAGE) | 0.52 |
| 10/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012255 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 09/27/2017)(AMOUNT INCLUDES ADV CK OF \$86.00) | 45.87 |
| 10/01/2017 | L100 | E121 | ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC.- LOS ANGELES (INVOICE NO. 0004147084-260) | 74.25 |
| 10/19/2017 | L100 | E124 | PARKING (6714) JEFFREY W. SAAB (HEARING) | 4.50 |
| 10/27/2017 | L100 | E112 | ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S MOTION FOR CLARIFICATION OF THIS COURT'S SEPTEMBER 15, 2017 ORDER) | 1.75 |
| 10/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR OCTOBER 2017 (536 PAGES AT .08/PAGE) | 21.44 |
| 11/01/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012611 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 10/30/2017) | 2.87 |
| 11/01/2017 | L100 | E112 | ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012611 DELIVERY/PICK UP - LYNCH HOPPER, LAS VEGAS NV / SERVICES PROVIDED ON 10/31/2017) | 16.67 |
| 11/01/2017 | L100 | E121 | ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC.- LOS ANGELES (INVOICE NO. 0004176986-260) | 24.75 |
| 11/02/2017 | L100 | E112 | COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012825 FILING - EIGHTH JUDICIAL DISTRICT COURT) | 2.87 |
| 11/07/2017 | L100 | E112 | ODYSSEY (STIPULATION AND ORDER TO CONTINUE HEARING ON PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION) | 1.75 |
| 11/08/2017 | L100 | E112 | ODYSSEY (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION) | 1.75 |
| 11/30/2017 | L100 | E101 | REPRODUCTION COSTS FOR NOVEMBER 2017 (266 PAGES AT .08/PAGE) | 10.64 |
| 12/01/2017 | L100 | E121 | ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC.- LOS ANGELES (INVOICE NO. 0004209264-260) | 123.75 |
| | | | Total Expenses | 339.75 |
| | | | Total Current Work | 3,141.25 |
| | | | Previous Balance before Adjustments | \$7,334.41 |
| 10/11/2017 | | | WRITE-OFF | -180.39 |
| | | | Previous Balance | \$7,154.02 |
| | | | <u>Payments</u> | |
| 10/11/2017 | | | PAYMENT RECEIVED - THANK YOU (ESIS CK #FA78624962 / STMT #9) | -3,015.21 |
| | | | Balance Due | <u>\$7,280.06</u> |

Past Due Amounts

| | | | | | |
|----------|-------|-------|--------|---------|----------|
| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
| 3,141.25 | 0.00 | 0.00 | 0.00 | 0.00 | 4,138.81 |

0379

AA3088

Split Billing Summary

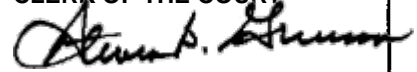
| | <u>Fees</u> | <u>Expenses</u> | <u>Advances</u> | <u>Total</u> |
|--|-------------|-----------------|-----------------|--------------|
| CHUBB INSURANCE - Panorama Tower I | 2,801.50 | 339.79 | 0.00 | 3,141.29 |
| ESIS Dallas AGL Claims (2) - Panorama Tower II | 2,801.50 | 339.75 | 0.00 | 3,141.25 |
| | 5,603.00 | 679.54 | 0.00 | 6,282.54 |

Task Code Recapitulation

| | <u>Fees</u> | <u>Expenses</u> |
|--|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 339.75 |
| L120 ANALYSIS/STRATEGY | 665.00 | 0.00 |
| L130 EXPERTS/CONSULTANTS | 70.00 | 0.00 |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 735.00 | 339.75 |
| L210 PLEADINGS | 297.50 | 0.00 |
| L230 COURT MANDATED CONFERENCES | 411.25 | 0.00 |
| L240 DISPOSITIVE MOTIONS | 428.75 | 0.00 |
| L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS | 656.25 | 0.00 |
| L200 PRE-TRIAL PLEADINGS AND MOTIONS | 1,793.75 | 0.00 |
| L320 DOCUMENT PRODUCTION | 19.00 | 0.00 |
| L340 EXPERT DISCOVERY | 175.00 | 0.00 |
| L350 DISCOVERY MOTIONS | 78.75 | 0.00 |
| L300 DISCOVERY | 272.75 | 0.00 |

NOTE: Please include Bremer, Whyte, Brown & O'Meara account number on all payments.

EXHIBIT "G"



FFCO

**DISTRICT COURT
CLARK COUNTY, NEVADA**

**LAURENT HALLIER, an individual;
PANORAMA TOWERS I, LLC, a Nevada
limited liability company; PANORAMA
TOWERS I MESS, LLC, a Nevada limited
liability company; and M.J. DEAN
CONSTRUCTION, INC., a Nevada
corporation,**

Plaintiffs,

Vs.

**PANORAMA TOWERS
CONDOMINIUM UNIT OWNERS'
ASSOCIATION, a Nevada non-profit
corporation.**

Defendant.

**PANORAMA TOWERS
CONDOMINIUM UNIT OWNERS'
ASSOCIATION, a Nevada non-profit
corporation,**

Counter-Claimant,

Vs.

**LAURENT HALLIER, an individual;
PANORAMA TOWERS I, LLC, a Nevada
limited liability company; PANORAMA
TOWERS I MEZZ, LLC, a Nevada limited
liability company; and M.J. DEAN
CONSTRUCTION, INC., a Nevada
Corporation,**

Counter-Defendants.

Case No. A-16-744146-D

Dept. No. XXII

**FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER**

SUSAN H. JOHNSON
DISTRICT JUDGE
DEPARTMENT XXII

1 **PANORAMA TOWERS**
2 **CONDOMINIUM UNIT OWNERS'**
3 **ASSOCIATION, a Nevada non-profit**
4 **corporation,**

5 **Third-Party Plaintiff,**

6 **Vs.**

7 **SIERRA GLASS & MIRROR, INC.; F.**
8 **ROGERS CORPORATION; DEAN**
9 **ROOFING COMPANY; FORD**
10 **CONSTRUCTING, INC.; INSULPRO,**
11 **INC.; XTREME EXCAVATION;**
12 **SOUTHERN NEVADA PAVING, INC.;**
13 **FLIPPINS TRENCHING, INC.;**
14 **BOMBARD MECHANICAL, LLC; R.**
15 **RODGERS CORPORATION; FIVE**
16 **STAR PLUMBING & HEATING, LLC**
17 **dba SILVER STAR PLUMBING; and**
18 **ROES 1 through 1000, inclusive,**

19 **Third-Party Defendants.¹**

20 **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

21 This matter, concerning Plaintiffs'/Counter-Defendants' Motion for Summary Judgment on
22 Defendant's/Counter-Claimant's April 5, 2018 Amended Notice of Claims filed August 3, 2018,
23 came on for hearing on the 2nd day of October 2018 at the hour of 10:30 a.m. before Department
24 XXII of the Eighth Judicial District Court, in and for Clark County, Nevada, with JUDGE SUSAN
25 H. JOHNSON presiding; Plaintiffs/Counter-Defendants LAURENT HALLIER, PANORAMA
26 TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC and M.J. DEAN CONSTRUCTION,
27 INC. appeared by and through their attorney, PETER C. BROWN, ESQ. of the law firm, BREMER
28 WHYTE BROWN & O'MEARA; and Defendant/Counter-Claimant/Third-Party Plaintiff
PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION appeared by and

¹ As the subcontractors are not listed as "plaintiffs" in the primary action, the matter against them is better characterized as a "third-party" claim, as opposed to "counter-claim."

1 through their attorneys, MICHAEL J. GAYAN, ESQ. and WILLIAM L. COULTHARD, ESQ. of
2 the law firm, KEMP JONES & COULTHARD, and FRANCIS I. LYNCH, ESQ. of the law firm,
3 LYNCH HOPPER.² Having reviewed the papers and pleadings on file herein, heard oral arguments
4 of the lawyers and taken this matter under advisement, this Court makes the following Findings of
5 Fact and Conclusions of Law:

6
7 **FINDINGS OF FACT AND PROCEDURAL HISTORY**

8 1. As this Court previously found in its September 15, 2017 Findings of Fact,
9 Conclusions of Law and Order, this case arises as a result of alleged constructional defects within
10 both the common areas and the 616 residential condominium units located within two tower
11 structures of the PANORAMA TOWERS located at 4525 and 4575 Dean Martin Drive in Las
12 Vegas, Nevada.

13 2. On February 24, 2016, Defendant/Counter-Claimant PANORAMA TOWERS
14 CONDOMINIUM UNIT OWNERS' ASSOCIATION served its original NRS 40.645 Notice of
15 Constructional Defects upon Plaintiffs/Counter-Defendants (also identified herein as the
16 "Contractors" or "Builders"), identifying the following deficiencies:

17
18 1. ***Residential tower windows***—There are two tower structures in the Development,
19 consisting of 616 residential condominium units located above common areas and retails
20 (sic) spaces below. The window assemblies in the residential tower units were defectively
21 designed such that water entering the assemblies does not have an appropriate means of
22 exiting the assemblies. There are no sill pans, proper weepage components or other drainage
provisions designed to direct water from and through the window assemblies to the exterior
of the building.

23 This is a design deficiency that exists in all (100%) of the residential tower window
24 assemblies.

25
26

 ²SCOTT A. WILLIAMS, ESQ. of the law firm, WILLIAMS & GUMBINER, also appeared telephonically on
27 behalf of PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION. Via Minute Order filed
28 January 13, 2017, this Court granted the Motion to Associate Counsel filed January 3, 2017 given non-opposition by
Plaintiffs/Counter-Defendants. However, no formal proposed Order granting the motion was ever submitted to the Court
for signature.

1 As a consequence of this deficiency, water that should have drained to the exterior of the
2 building has been entering into the metal framing components of the exterior wall and floor
3 assemblies, including the curb walls that support the windows, and is causing corrosion
4 damage to the metal parts and components within these assemblies. Further, this damage to
5 the metal components of the tower structures presents an unreasonable risk of injury to a
6 person or property resulting from the degradation of these structural assemblies.
7 ...

8 **2. Residential tower fire blocking**—The plans called for fire blocking insulation, as
9 required by the building code, in the ledger shelf cavities and steel stud framing cavities at
10 the exterior wall locations between residential floors in the two tower structures. ... The
11 purpose of this insulation is to deter the spread of fire from one tower unit to the units above
12 or below. However, the insulation was not installed as required by the plans and building
13 code.

14 This installation deficiency exists in all (100%) of the residential tower units, in which
15 insulation was omitted either from the ledger shelf cavity, from the steel stud framing cavity,
16 or from both.

17 This deficiency presents an unreasonable risk of injury to a person or property resulting from
18 the spread of fire.

19 **3. Mechanical room piping**—The piping in the two lower and two upper mechanical
20 rooms in the two tower structures has sustained corrosion damage as described in the
21 attached ATMG report dated November 17, 2011. ...

22 **4. Sewer problem**—The main sewer line connecting the Development to the city sewer
23 system ruptured due to installation error during construction, causing physical damage to
24 adjacent common areas. This deficiency has been repaired. In addition to causing damage,
25 the defective installation presented an unreasonable risk of injury to a person or property
26 resulting from the disbursement of unsanitary matter.³

27 **3.** The Contractors elected to inspect the constructional defects identified within the
28 Association's NRS 40.645 Notice on March 24, 2016.⁴ During the inspection, the Contractors
observed windows located in Unit 300 had been already been removed and replaced. Likewise,
prior to the Contractors' inspection, the majority of the alleged corroded mechanical room piping, as
well as the averred defective sewer piping had also been removed, replaced and/or repaired. The
Contractors were not provided notice of the removal or replacement of the alleged constructional

³See Exhibit 1 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's April 5, 2018 Amended Notice of Claims filed August 3, 2018.

⁴This Court understands neither the Association's representative nor its experts attended this inspection.

1 defective windows in Unit 300 or the deficient piping in the mechanical room prior to the March 24,
2 2016 inspection.

3 4. On March 29, 2016, the Contractors' lawyer sent a letter to the attorneys for the
4 Association, requesting "information regarding the alleged sewer line, including the date of
5 occurrence and the date of repair. ...In addition, please confirm the current location of any sewer
6 line materials that were removed and replaced as part of the repair." Further, counsel requested "the
7 date(s) when that work [in replacing the pipes in the mechanical room] was done and the identity of
8 the contractor(s). Please also confirm whether and where the removed pipes have been stored for
9 safekeeping."⁵ As there was no response from the Owners' Association to the March 29, 2016
10 correspondence, the Contractors' attorney followed-up with another letter sent a month later, April
11 29, 2016.⁶ However, there was also no response to the April 29, 2016 letter.

12 5. The Contractors thereafter responded to the Association's NRS 40.645 notice, and the
13 parties subsequently engaged in the NRS 40.680 pre-litigation mediation with no success on
14 September 26, 2016.

15 6. The Contractors filed their Complaint on September 28, 2016 against the Owners'
16 Association, asserting the following claims, mostly dealing with their perception the NRS 40.645
17 notice was deficient:

- 18 1. Declaratory Relief—Application of AB 125;
- 19 2. Declaratory Relief—Claim Preclusion;
- 20 3. Failure to Comply with NRS 40.600, *et seq.*;
- 21 4. Suppression of Evidence/Spoliation;

22
23
24
25
26
27 ⁵See Exhibit 2 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's April 5, 2018 Amended Notice of Claims.

28 ⁶See Exhibit 3 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's April 5, 2018 Amended Notice of Claims.

5. Breach of Contract (Settlement Agreement in Prior Litigation);

6. Declaratory Relief—Duty to Defend; and

7. Declaratory Relief—Duty to Indemnify.

7. On March 1, 2017, PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION filed its Answer and Counter-Claim, alleging the following claims:

1. Breach of NRS 116.4113 and 116.4114 Express and Implied Warranties; as well as those of Habitability, Fitness, Quality and Workmanship;

2. Negligence and Negligence *Per Se*;

3. Products Liability (against the manufacturers);

4. Breach of (Sales) Contract;

5. Intentional/Negligent Disclosure; and

6. Duty of Good Faith and Fair Dealing; Violation of NRS 116.1113.

8. The Contractors moved this Court for summary judgment, or dismissal of the Counter-Claim on March 20, 2017 upon the bases:

(1) the Association failed to comply with NRS 40.645(2)(b) by not

(a) listing each defect in *specific* detail,

(b) describing in reasonable detail the nature and extent that is known of the damage or injury resulting from the defects,

(c) providing verification from each owner the defect exists in his unit, and

(d) arranging for its representative and expert to be present at the inspection; and

(2) the Owners' Association failed to provide notice of defects prior to performing repairs.

In this regard, the Contractors also sought partial summary judgment with respect to the Third Claim for Relief contained in their Complaint.

...

1 9. The Owners' Association opposed, arguing its NRS 40.645 notice is presumed to be
2 valid, and further, the notice statutes are meant to require substantial as opposed to technical or strict
3 compliance. Further, in the Association's view, the Contractors' interpretation of AB 125 was not
4 reasonable, led to absurd results and violated due process. Notwithstanding these arguments, if this
5 Court found the notice to be deficient, the appropriate remedy would be to stay the case and provide
6 curative instructions as opposed to dismissal of the Counter-Claim. *See* NRS 40.647(2)(b).
7

8 10. This Court heard the matter on June 20, 2017, and thereafter, on September 15, 2017,
9 issued its 20-page Findings of Fact, Conclusions of Law and Order, granting Plaintiffs'/Counter-
10 Defendants' motion in part. This Court also ordered Defendant's/Counter-Claimant's claim for
11 constructional defects located in the mechanical rooms were dismissed as time-barred pursuant to
12 the statute of limitations set forth in NRS 11.202. Further, this Court found and concluded the NRS
13 40.645 Notice of Constructional Defects served February 24, 2016 was deficient, and Plaintiffs/
14 Counter-Defendants met their burden of overcoming the presumption of the notice's validity.
15 However, this Court declined to dismiss Defendant's/Counter-Claimant's Counter-Claim pursuant to
16 NRS 40.647(2)(a) as such would prevent the Association from filing another action. This Court
17 stayed the proceedings with respect to constructional defects relating to window assemblies, fire
18 blocking and sewer problems for a period of six (6) months.
19
20

21 11. On April 5, 2018, the Association served the Contractors with an Amended NRS
22 Chapter 40 Notice of Constructional Defects.⁷ Within this amendment, Defendant/Counter-
23 Claimant incorporated by reference information contained in the February 24, 2016 Notice. It set
24 forth the constructional defects as follows:
25

26 ...

27
28 ⁷*See* Exhibit 7 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's April 5, 2018 Amended Notice of Claims.

1. Residential tower windows

There are two residential tower structures in the Development, consisting of 616 condominium units located above common areas and retail spaces below. The window assemblies in the residential tower units were defectively designed such that water entering the assemblies does not have an appropriate means of exiting the assemblies.

The window assemblies were built in accordance with the project plans, which contained two significant design deficiencies that are identified in specific detail in the accompanying report prepared by the Association's architect, Karim Allana, which is attached hereto as "Exhibit A" and incorporated by reference:

- 1) Contrary to applicable requirements of the 2000 International Building Code, ASTM and ICBO standards, and the EIFS manufacturer's installation instructions, the plans failed to specify pan flashings at the rough openings for the windows.
- 2) Contrary to applicable requirements of the 2000 International Building Code, ASTM and ICBO standards, and the EIFS manufacturer's installation instructions, the plans failed to specify head flashings at the rough openings for the windows.

Because these flashings were not called for in the plans and specifications, they were not installed.

This is a design deficiency that exists in all (100%) of the residential tower window assemblies. The location of each of the windows installed in accordance with this defective design is marked on the exterior plan elevations for the two towers and attached hereto as "Exhibit B."

As a consequence of this deficiency, water that should have drained to the exterior of the building has been entering the metal framing components of the exterior wall and floor assemblies, including the curb walls that support the windows, and is causing corrosion damage to the metal parts and components within these assemblies as described and identified in Exhibit A. The resulting damage to the metal components of the tower structures present an unreasonable risk of injury to a person or property resulting for the degradation of these structural assemblies.

2. Residential tower exterior wall insulation

The plans called for insulation/fire blocking, as required by the building code, in the ledger shelf cavities and steel stud framing cavities at the exterior wall locations between residential floors in the two tower structures. The purpose of this insulation is to act as a fire block provision to deter the spread of fire from one tower unit to the units above or below, and to prevent condensation from occurring within the exterior wall assemblies. However, the insulation was not installed as required by the plans and building code.

The installation deficiency exists in the majority of the locations where it is required for the 616 residential tower units, in which insulation was omitted either from the ledger shelf cavity, from the steel stud framing cavity, or from both. From November of 2015, through January of 2016, 15 units in the Development were inspected. Units were selected from different towers and with different exposures to obtain a mixed sampling. Of the ledger shelf cavities, inspected, 76% had no fire blocking insulation (sic) and many of the steel stud framing cavities had questionable and/or a lack of proper fire blocking provisions. ...

This deficiency presents an unreasonable risk of injury to a person or property resulting from the spread of fire, and from the accumulation of additional moisture in the wall assemblies, thereby exacerbating the window drainage deficiency described above.

1 **3. Sewer problem**

2 The main sewer line connecting the Development to the city sewer system ruptured
3 due to installation error during construction, causing physical damage to adjacent common
4 areas.

5 The rupture of the sewer line caused raw sewage to be deposited on the common area
6 of the development in the location of the rupture. In addition to causing damage in the
7 vicinity of the rupture, the defective installation presented an unreasonable risk of injury to a
8 person or property resulting from the disbursement of unsanitary matter.

9 Because the Association had previously settled a suit against the Builders and had not
10 yet discovered the window and insulation claims, it was assumed by the Association that this
11 isolated incident would not be the subject of the Chapter 40 claim. The association therefore
12 repaired the ruptured sewer line without giving notice to the Builders.

13 **12.** The Contractors now move this Court for summary judgment with respect to the
14 amended NRS 40.645 notice as, in their view, it does not cure the deficiencies identified in the initial
15 one. Specifically, with respect to the window assemblies, of which there are over 9,500 within the
16 towers, the Contractors quotes this Court in its September 25, 2017 Order and argue the Association
17 did not provide specific detail of each defect, damage and injury within the revised notice.
18 Concerning the insulation claims, the Contractors again quoted this Court, and noted the “specific
19 detail” requirement of NRS 40.645 necessitates the exact location of the defect in each unit, whether
20 it be within the ledger shelf cavity, the steel stud framing hollow space, or in both areas. Further,
21 there is nothing specified how the Association knows this particular “installation deficiency” exists
22 in all or 100 percent of all the residential tower units. Lastly, the Contractors argue the Association
23 does not dispute Plaintiffs/Counter-Defendants have been divested of their statutory right to inspect
24 and repair the sewer deficiencies.

25 **13.** The Association opposes, arguing, *first*, summary judgment is precluded as the
26 requirement for it to provide notice of constructional defects is eviscerated once the Contractors
27 initiated a legal action. *See* NRS 40.645(4). *Second*, and notwithstanding the first point, the
28 amended notice provided April 5, 2018 is sufficient and consistent with this Court’s September 15,
 2017 Findings of Fact, Conclusions of Law and Order. With respect to window defects, they are

1 design deficiencies within the assemblies such that water entering them does not have an appropriate
2 means of exiting. That is, the architectural and exterior insulation finishing system ("EIFS" herein)
3 shop drawings of the project, and investigation photographs taken during destructive testing of some
4 window assemblies showed the windows' and EIFS assemblies did not have pan or head flashings.
5 The flashings are required by the material manufacturers and building code, and the defects were
6 universal. Concerning the fire blocking insulation and sewer system, the Association noted notice
7 methodology similar to that with respect to the window deficiencies was not available; the plans and
8 drawings do call for the presence of fire blocking insulation, but such is absent in some limited
9 testing. The sewer pipes were repaired prior to notice being given to the Contractors.

11 CONCLUSIONS OF LAW

12 1. As this Court previously stated in its September 15, 2017 Findings of Fact,
13 Conclusions of Law and Order, summary judgment is appropriate and "shall be rendered forthwith"
14 when the pleadings and other evidence on file demonstrates no "genuine issue as to any material fact
15 [remains] and that the moving party is entitled to a judgment as a matter of law." See NRCP 56(c);
16 Wood v. Safeway, Inc., 121 Nev. 724, 729, 121 P.3d 1026 (2005). The substantive law controls
17 which factual disputes are material and will preclude summary judgment; other factual disputes are
18 irrelevant. Id., 121 Nev. at 731. A factual dispute is genuine when the evidence is such that a
19 rational trier of fact could return a verdict for the non-moving party. Id.

20 2. While the pleadings and other proof must be construed in a light most favorable to
21 the non-moving party, that party bears the burden "to do more than simply show that there is some
22 metaphysical doubt" as to the operative facts in order to avoid summary judgment being entered in
23 the moving party's favor. Matsushita Electric Industrial Co. v. Zenith Radio, 475, 574, 586 (1986),
24 cited by Wood, 121 Nev. at 732. The non-moving party "must, by affidavit or otherwise, set forth
25 specific facts demonstrating the evidence of a genuine issue for trial or have summary judgment
26
27
28

entered against him.” Bulbman, Inc. v. Nevada Bell, 108 Nev. 105, 110, 825 P.2d 588, 591 (1992),
cited by Wood, 121 Nev. at 732. The non-moving party “is not entitled to build a case on the
gossamer threads of whimsy, speculation, and conjecture.” Bulbman, 108 Nev. at 110, 825 P.2d
591, quoting Collins v. Union Fed. Savings & Loan, 99 Nev. 284, 302, 662 P.2d 610, 621 (1983).

Sufficiency of the Amended NRS 40.645 Notice and Adherence to NRS Chapter 40 Process

3. Again, the provisions of NRS 40.600 to 40.695 were enacted by the Nevada
Legislature with the intent to provide contractors an opportunity to repair constructional defects and
avoid litigation. See D.R. Horton, Inc. v. District Court, 123 Nev. 468, 476, 168 P.3d 731 (2007).⁸
To ensure contractors were given an opportunity to repair, the Nevada Legislature required a
homeowner or claimant to give the contractor notice of constructional defects initially in “reasonable
detail,”⁹ and based upon that notice, allow the contractor time and opportunity to inspect and make
repairs when a deficiency was verified.¹⁰ A claimant’s failure to comply with those requirements
before filing a constructional defect action results in the dismissal or postponement of that action
until those mandates are complied.¹¹

4. In 2015, the Nevada Legislature made sweeping revisions to the state’s laws relating
to constructional defects with the enactment of Assembly Bill (AB) 125. Of significance here, AB
125 amended provisions governing the information required to be provided within a notice of
constructional defects. Further, NRS 40.645(2), as revised in AB 125, sets forth more stringent
requirements for the constructional defect notice than what was in place prior to February 25, 2015.

...

...

⁸This case is commonly referred to as “*First Light I*” by practicing lawyers and judges.
⁹See NRS 40.645 in effect prior to February 25, 2015. Assembly Bill (AB) 125, which became effective on
February 25, 2015, resulted in a change to NRS 40.645(2) to require “specificity” or “specific detail.”

¹⁰See NRS 40.647(1).

¹¹See NRS 40.647(2).

1 It now provides:

2 The notice given pursuant to [NRS 40.645(1)] must:

3 (a) Include a statement that the notice is being given to satisfy the
4 requirements of this section;

5 (b) Identify in *specific* detail each defect, damage and injury to each
6 residence or appurtenance that is the subject of the claim including, without
7 limitation, the exact location of each such defect, damage and injury;

8 (c) Describe in reasonable detail the cause of the defects if the cause is
9 known and the nature and extent that is known of the damage or injury resulting from
10 the defects; and

11 (d) Include a signed statement, by each named owner of a residence or
12 appurtenance in the notice, that each such owner verifies that each such defect,
13 damage and injury specified in the notice exists in the residence or appurtenance
14 owned by him or her. If a notice is sent on behalf of a homeowners' association, the
15 statement required by this paragraph must be signed under penalty of perjury by a
16 member of the executive board or an officer of the homeowners' association.

17 (Emphasis added)

18 5. While NRS 40.645 was revised to include more stringent requirements within the
19 pre-litigation notice to contractors, such notices still are presumed valid. *See D.R. Horton, Inc.*, 123
20 Nev. at 481. A contractor who wishes to challenge the adequacy of a pre-litigation notice bears the
21 burden of doing so with specificity. *Id.* Because each case is factually distinct, the district courts
22 have wide discretion to consider each contractor's challenge to the reasonableness¹² of each pre-
23 litigation notice. As noted by the Nevada Supreme Court in *D.R. Horton, Inc.*, 123 Nev. at 481, "the
24 district courts are well suited to determine whether a notice preserves a contractor's opportunity to
25 repair."

26 6. NRS 40.647(1) also sets forth other requirements such as the claimant must allow
27 inspection of and reasonable opportunity to the contractor to repair the defect. Further, he or his
28 expert is required to be present at the inspection. NRS 40.647(1) specifically states:

...
...

¹²The Nevada Supreme Court's decision in *D.R. Horton, Inc.*, pre-dates the enactment of AB 125, which includes the amendment to NRS 40.645(2). This Court presumes, if presented the same issues today, the high court's interpretation would have indicated the district courts have wide discretion to consider the contractor's challenge to the "specificity," rather than "reasonableness" of the pre-litigation notice.