Case No. 80615

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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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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Defendant's Motion for Reconsideration of the	6/13/19	16	2475–2505
Court's May 23, 2019 Findings of Fact,			
Conclusions of Law, and Order Granting			
Plaintiffs' Motion for Summary Judgment			
Pursuant to NRS 11.202(1)			
Defendant's Motion to Amend the Court's	9/9/19	25–26	4406–4476
May 23, 2019 Findings of Fact, Conclusions			
of Law and Order Granting Plaintiffs' Motion			
for Summary Judgment Pursuant to NRS			
11.202(1)			

Defendant's Motion to Dismiss Complaint	12/7/16	1	74–85
Defendant's Motion to Retax and Settle Costs	5/31/19	16	2418–2428
Defendant's Opposition to Motion for	7/1/19	24	4053-4070
Attorneys' Fees			
Defendant's Opposition to Motion for	11/16/18	9–10	1451–1501
Declaratory Relief; Countermotions to			
Exclude Inadmissible Evidence and for Rule			
56(f) Relief			
Defendant's Opposition to Motion for	1/22/19	11	1639–1659
Reconsideration			
Defendant's Opposition to Motion for	4/26/17	4	401–439
Summary Judgment			
Defendant's Opposition to Motion for	9/4/18	6–7	840–1077
Summary Judgment			
Defendant's Opposition to Motion for	3/1/19	14	2199–2227
Summary Judgment and Conditional			
Countermotion for Relief Pursuant to NRS			
40.695(2)			
Defendant's Opposition to Plaintiffs/Counter-	2/20/20	27	4818–4833
Defendants' First Supplement to Their Motion			
for Attorneys' Fees			
Defendant's Reply in Support of	3/19/19	15	2270–2316
Countermotion			
Defendant's Reply in Support of Counter-	1/29/19	11	1857–1862
Motions to Exclude Inadmissible Evidence			
and for Rule 56(f) Relief			
Defendant's Reply in Support of Defendant's	7/9/19	24	4104-4171
Motion for Reconsideration, or in the			
Alternative, Motion to Stay the Court's Order			
Defendant's Reply in Support of Motion for	11/15/17	4	555–560
Clarification			

Defendant's Reply in Support of Motion for	7/9/19	24	4071–4077
Reconsideration of and/or to Alter or Amend			
the Court's May 23, 2019 Findings of Fact,			
Conclusions of Law and Order Granting			
Plaintiffs' Motion for Summary Judgment			
Pursuant to NRS 11.202(1)			
Defendant's Reply in Support of Motion to	10/10/19	26	4497–4508
Amend the Court's May 23, 2019 Findings of			
Fact, Conclusions of Law and Order Granting			
Plaintiffs' Motion for Summary Judgment			
Pursuant to NRS 11.202(1)			
Defendant's Reply in Support of Motion to	1/17/17	2	223–230
Dismiss			
Defendant's Reply in Support of Motion to	7/9/19	24	4078-4103
Retax and Settle Costs			
Errata to Defendant's Opposition to Motion	11/19/18	10	1502-1507
for Declaratory Relief and Countermotions to			
Exclude Inadmissible Evidence and for Rule			
56(f) Relief			
Errata to: Plaintiffs/Counter-Defendants'	2/5/19	12–14	1948–2051
Motion for Declaratory Relief Regarding			
Standing			
Errata to: Plaintiffs' Reply in support of	2/5/19	12	1909–1947
Motion for Declaratory Relief Regarding			
Standing and Oppositions to Defendant's			
Counter-Motions to Exclude Inadmissible			
Evidence and for Rule 56(f) Relief			
Findings of Fact, Conclusions of Law and	5/23/19	15–16	2377–2395
Order			
Findings of Fact, Conclusions of Law, and	9/15/17	4	497–516
Order			
Findings of Fact, Conclusions of Law, and	11/30/18	10	1508–1525
Order			
Notice of Appeal	2/13/20	27	4772–4817

Notice of Entry of Order	5/28/19	16	2396–2417
Notice of Entry of Order Re: Defendant's	1/16/20	26	4535–4546
Motion to Alter or Amend Court's Findings of			
Fact, Conclusions of Law and Order Entered			
May 23, 2019			
Notice of Entry of Order Re: Motion to	8/13/19	25	4390-4405
Certify Judgment as Final Under NRCP 54(b)			
Order Denying Defendant's Motion for	7/24/19	25	4313–4315
Reconsideration of the Court's May 23, 2019			
Findings of Fact, Conclusions of Law, and			
Order Granting Plaintiffs' Motion for			
Summary Judgment Pursuant to NRS			
11.202(1) or, in the Alternative, Motion to			
Stay the Court's Order			
Order Denying Motion for Clarification	2/1/18	5	584–585
Order Denying Motion to Dismiss	2/9/17	2	261–262
Order Denying Plaintiffs/Counter-Defendants'	3/11/19	15	2231–2233
Motion for Declaratory Relief Regarding			
Standing			
Order Denying Plaintiffs/Counter-Defendants'	3/11/19	14	2228–2230
Motion for Reconsideration of Their Motion			
for Summary Judgment on			
Defendant/Counter-Claimant's April 5, 2018			
Amended Notice of Claims			
Order re: Defendant's Motion for	8/9/19	25	4369–4376
Reconsideration and/or to Alter or Amend the			
Court's May 23, 2019 Findings of Fact,			
Conclusions of Law and Order Granting			
Plaintiffs' Motion for Summary Judgment			
Pursuant to NRS 11.202(1)			
Order Re: Defendant's Motion to Alter or	1/14/20	26	4526–4534
Amend Court's Findings of Fact, Conclusions			
of Law and Order Entered May 23, 2019			

Order Re: Motion to Certify Judgment as Final	8/12/19	25	4377–4389
Under NRCP 54(b)			
Plaintiffs/Counter-Defendants' First	2/6/20	26–27	4547–4753
Supplement to Motion for Attorneys' Fees;			
Exhibits			
Plaintiffs/Counter-Defendants' Motion for	2/11/19	14	2052–2141
Summary Judgment Pursuant to NRS			
11.202(1)			
Plaintiffs/Counter-Defendants' Opposition to	6/21/19	22–24	3734–4042
Defendant's Motion for Reconsideration of the			
Court's May 23, 2019 Findings of Fact,			
Conclusions of Law, and Order Granting			
Plaintiffs' Motion for Summary Judgment			
Pursuant to NRS 11.202(1) or, in the			
alternative, Motion to Stay the Court's Order;			
Appendix			
Plaintiffs/Counter-Defendants' Opposition to	6/21/19	22	3664–3733
Motion to Retax			
Plaintiffs/Counter-Defendants' Reply in	7/9/19	24	4172–4198
Support of Motion for Attorneys' Fees			
Plaintiffs/Counter-Defendants' Reply in	2/4/19	11–12	1863–1908
Support of Motion for Reconsideration of their			
Motion for Summary Judgment on			
Defendant's April 5, 2018 Amended Notice of			
Claims			
Plaintiffs' Motion for Attorneys' Fees;	6/16/19	16–22	2506–3663
Appendices I–II			
Plaintiffs' Motion for Declaratory Relief	10/22/18	7–9	1180–1450
Regarding Standing; Appendices I–III.			
Plaintiffs' Motion for Reconsideration of their	12/17/18	10–11	1526–1638
Motion for Summary Judgment on			
Defendant's April 5, 2018 Amended Notice of			
Claims			

aintiffs' Motion for Summary Judgment on 8/	/3/18	5–6	651–839
efendant's April 5, 2018 Amended Notice of			
aims			
aintiffs' Motion for Summary Judgment on 3/2	20/17	2–4	297–400
efendant's Counter-Claim and Plaintiffs'			
otion for Partial Summary Judgment on			
eir Third Claim for Relief			
aintiffs' Motion to Certify Judgment as 7/2	22/19	25	4277–4312
nal Under Rule 54(b) (On Order Shortening			
me)			
aintiffs' Opposition to Defendant's July 16, 7/1	19/19	24–25	4264–4276
19 Oral Motion to Postpone to the Court's			
lling on the Reconsideration of and/or to			
ter or Amend the Court's May 23, 2019			
ndings of Fact, Conclusions of Law and			
der Granting Summary Judgment			
aintiffs' Opposition to Defendant's Motion 7/	/1/19	24	4043–4052
Reconsideration of and/or to Alter or			
mend the Court's May 23, 2019 Findings of			
ct, Conclusions of Law, and Order Granting			
aintiffs' Motion for Summary Judgment			
rsuant to NRS 11.202(1)			
aintiffs' Opposition to Defendant's 2/1	10/20	27	4754–4771
enewed Motion to Retax and Settle Costs			
aintiffs' Opposition to Motion for 10/	/27/17	4	547–554
arification			
aintiffs' Opposition to Motion to Amend the 9/2	26/19	26	4477–4496
ourt's May 23, 2019 Findings of Fact,			
onclusions of Law and Order Granting			
aintiffs' Motion for Summary Judgment			
rsuant to NRS 11.202(1)			
aintiffs' Opposition to Motion to Dismiss; 1/	/4/17	1–2	86–222
ppendix			

Plaintiffs' Reply in Support of Motion for	1/22/19	11	1660–1856
Declaratory Relief Regarding Standing and			
Oppositions to Counter-Motions to Exclude			
Inadmissible Evidence and for Rule 56(f)			
Relief; Appendix			
Plaintiffs' Reply in Support of Motion for	5/10/17	4	440–449
Summary Judgment			
Plaintiffs' Reply in Support of Motion for	9/25/18	7	1078–1092
Summary Judgment			
Plaintiffs' Reply in Support of Motion to	8/5/19	25	4334–4343
Certify Judgment as Final under Rule 54(b)			
Plaintiffs' Reply in Support of Their Motion	3/15/19	15	2234–2269
for Summary Judgment Pursuant to NRS			
11.202(1); Opposition to Conditional			
Countermotion; Appendix			
Recorder's Transcript of Proceedings	1/24/17	2	231–260
Recorder's Transcript of Proceedings	6/20/17	4	450–496
Recorder's Transcript of Proceedings	11/21/17	4–5	561–583
Recorder's Transcript of Proceedings	3/15/18	5	586–593
Recorder's Transcript of Proceedings	4/12/18	5	642–650
Recorder's Transcript of Proceedings	10/2/18	7	1093–1179
Recorder's Transcript of Proceedings	2/12/19	14	2142–2198
Recorder's Transcript of Proceedings	4/23/19	15	2317–2376
Recorder's Transcript of Proceedings	7/16/19	24	4199–4263
Recorder's Transcript of Proceedings	8/6/19	25	4344-4368
Recorder's Transcript of Proceedings	10/17/19	26	4509–4525

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	CORRESPONDENCE WAS SERVED IN A	Hours	
JBV L320 A104	PROPER MANNER ON SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON VICTAULIC VIA CERTIFIED MAIL, RE: VERIFYING THAT	0.05	6.00
JBV L320 A104	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) REVIEW/ANALYZE RETURNED INITIAL NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: VERIFYING THAT SAID	0.05	6.00
JBV L320 A104	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) 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	0.05	6.00
JBV L320 A104	SAID SUBCONTRACTOR/MANUFACTURER/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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 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/SUPPLI ER, IN COMPLIANCE WITH NRS 40.646. (TIME	0.00	0.00
	JBV	L320	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.05 0.15	6.00
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	0.45	20.05
	DMC	L120	A109	CARRIER REQUEST) APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (ARCHITECT) RE:	0.15	26.25
	PCB	L130	A109	(ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.20	35.00
	PCB	L130	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT (MICHELLE ROBBINS)	0.20	35.00

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					Hours	
				(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)		
				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		
	JBV	L320	A104	REQUEST) 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	0.10	12.00
	JBV	L320	A104	REQUEST) 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 PREPARATION FOR PROVIDING FORD	0.05	6.00

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				CONTRACTING AS SUBCONTRACTOR HOLDING A RELEVANT SCOPE OF WORK TO	Hours	
				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: (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		••
	JBV	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE BUILDING ENVELOPE, RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO	0.25	43.75
	JBV	L320	A104	CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE, INC., RE: VERIFYING RECIPIENT INFORMATION, IN PREPARATION FOR IMPLEMENTING SAID INFORMATION INTO CLIENTS' SUMMARY OF	0.05	6.00
	JBV	L320	A104	CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC., RE: INABILITY TO SERVE CHAPTER 40	0.05	6.00

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Panorama Tower II 5143220827859X PANORAMA TOWER II

04/25/2016

			CORRESPONDENCE FROM PLAINTIFF'S	Hours	
JBV	L320	A103	COUNSEL, IN PREPARATION FOR DETERMINING NEXT LOCATION TO ATTEMPT SERVICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS,	0.05	6.00
JBV	L320	A104	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) REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE:	0.05	6.00
JBV	L320	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE OCIP COVERAGE INFORMATION	0.05	6.00
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	6.00
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	0.00	0.70

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	RAB	L320	A103	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) DRAFT/REVISE (BEGIN) DEFECT LIST	Hours 0.35	42.00
				SUMMARY AND COST OF REPAIR SUMMARY, RE: (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)	0.10	6.00
	DMC	L120	A103	DRAFT/RÉVISE CORRESPONDENCE TO ENDURANCE SPECIALTY INSURANCE COMPANY (CLIENTS' EXCESS CARRIER) RE:		
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.45	78.75

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				REQUIRED BY STATUTE. (TIME SPLIT WITH	Hours	
	DMC	L120	A107	OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR TEXAS WALL SYSTEMS NOW KNOWN AS OLDCASTLE BUILDINGENVELOPE) RE:	0.15	26.25
					0.15	26.25
05/02/2016	DMC	L120	A104	REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT RE:		
				(TIME SPLIT WITH OTHER CLAIM	0.05	
	DMC	L120	A104	NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CLIENTS' OCIP MANUAL	0.05	8.75
				PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.20	35.00
	DMC	L120	A104	REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT MJ DEAN IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND	0.20	33.33
	DMC	L120	A104	CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CHAPTER 40 NOTICE TO	0.25	43.75
				CLIENT HALLIER PROPERTIES IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS)		
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CORRESPONDENCE FROM MARTIN LITTLE (PERSONAL COUNSEL	0.25	43.75
				FOR CLIENT MJ DEAN) RE:		
				(TIME SPLIT		

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				Hours	
DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE BANKRUPTCY PETITION	0.05	8.75
			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		
DMC	L120	A104	REQUEST) 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
			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:		
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.15	26.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.15	26.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.45	78.75

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

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					Hours	
				(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	(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	0.10	17.50
	PCB	L120	A104	PER CARRIER REQUEST) REVIEW/ANALYZE PORTIONS OF AB 125 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10 0.25	17.50 43.75
05/16/2016	PCB	L250	A104	REVIEW/ANALYZE PORTIONS OF AB 125 (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	5.10	. 5 5

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Panorama Tower II 5143220827859X PANORAMA TOWER II

					Hours	
	RAB	L110	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4575 DEAN MARTIN DRIVE	0.40	48.00
				(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		
	DMC	L120	A103	PER CARRIER REQUEST) 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 LABILITY (5 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM	0.65	113.75
				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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							Н	ours
				(TIME SPLIT PER CARRIE		R CLAIM NO./FILI		0.15 26.25
				For Current S	ervices Rend	•	2	7.90 4,035.50
				Total Non-billa	able Hours		(0.60
-					Recapitulatior		5.4	T ()
	<u>ekeeper</u> er C. Brown			<u>Title</u> PARTNER		<u>Hours</u> 6.95	<u>Rate</u> \$175.00	<u>Total</u> \$1,216.25
	nifer Vela			PARALEGAL		8.20	120.00	984.00
Lexi				PARALEGAL		5.25	120.00	630.00
	ene M. Cartier			ASSOCIATE		5.55	175.00	971.25
	hel A. Bounds			PARALEGAL		1.95	120.00	234.00
					Expenses			
03/31/2	2016	L100	E101	REPRODUCT	TION COSTS	FOR MARCH 20°	16 (1927	
				PAGES AT .0	,			77.08
04/30/2	2016	L100	E101	REPRODUCTION COSTS FOR APRIL 2016 (141 PAGES AT .08/PAGE)			6 (141	5.64
05/31/2	2016	L100	E101		,	FOR MAY 2016 (1141	0.04
				PAGES AT .0	PAGES AT .08/PAGE)			45.64
	Total Expenses						128.36	
				Total Current	Work			4,163.86
				Previous Bala	ince			\$7,899.73
				Balance Due				<u>\$12,063.59</u>
				Pa	st Due Amou	nts		
	<u>0</u> -	-30	3	<u>1-60</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 Recapit	ulation		
							Fee	<u>Expenses</u>
L100				LOPMENT AN	D ADMINIST	RATION	0.0	0 128.36
L110 FACT INVESTIGATION/DEV			ELOPMENT			971.0		
L120	ANALYSIS/S					1099.7		
L130						NUCTOATION	178.7	
L190				T, DEVELOPM			35.0	_
L100	CASE ASSES	SSMENT	Γ, DEVE	LOPMENT AN	D ADMINIST	RATION	2,284.5	0 128.36
L240	DISPOSITIVE	E MOTIC	ONS				61.2	5 0.00
L250	L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS						210.0	0.00

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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

Final Statement Run Totals 03/01/2017

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

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

TAX ID # 33-0747275

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ESIS Dallas AGL Claims March 02, 2017
P.O. Box 5127 Account No: 1287-5581V
Scranton, PA 18505 Statement No: 6

Scranton, PA 18505 USA

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X PANORAMA TOWER II

Fees

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	Hours	
	DMC	L120	A104	REQUEST) 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)	0.10	9.50 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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				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	Hours	
06/23/2016	DMC	L120	A104	CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM	0.05	8.25
0,20,20				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	РСВ	L120	A103	DRAFT/REVISE (FINALIZE) FIRST SUIT REPORT RE:		
				(TIME		
	DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT	0.60	111.00
				TO CARRIER RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.60	99.00
	DMC	L120	A103	•	0.00	99.00
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.45	74.25
				TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
	DMC	L120	A104	EDWARD SONG AND SCOTT WILLIAMS TO DETERMINE THEIR BACKGROUND AND EXPERIENCE IN PREPARATION FOR DRAFTING INITIAL REPORT TO CARRIER.		
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT	0.15	24.75

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			TO CARRIER RE:	Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.20	33.00
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.10	16.50
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.35	57.75
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.35	57.75
DMC	L120	A103	TO CARRIER RE:	0.60	99.00
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
			(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:	Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.45	74.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.40	66.00
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.30	49.50
DMC	L120	A103	REQUEST)	0.10	16.50
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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	DMC	L120	۸ ۱ ۸ ۲	DRAFT/REVISE (CONTINUE) INITIAL REPORT	Hours	
		L120		TO CARRIER RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: (TIME SPLIT	0.45	74.25
				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)	0.10	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		
	DMC	L120	A103	REQUEST) DRAFT/REVISE E-MAIL TO WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM	0.25	41.25
	DMC	L120	A104	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
				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	0.05	9.25
DMC	L120	A104	REQUEST) 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	0.05	8.25
DMC	L120	A104	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
DMC	L120	A104	REQUEST) 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	0.05	8.25
DMC	L120	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: SUBCONTRACTORS CLAIMANT PLACED ON NOTICE OF THE CLAIM AND REQUEST FOR	0.15	24.75

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07/01/2016

			INFORMATION WE HAVE RELATING TO SAME, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON	Hours	
PCB	L110	A104	BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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.	0.05	8.25
PCB	L120	A101	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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:	0.10	18.50
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	55.50
PCB	L190	A103	DRAFT/REVISE (FINALIZE) NOTICE OF CLAIM/TENDER OF DEFENSE TO ENDURANCE RE:		
PCB	L190	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	18.50
РСВ	L110	A107	DISCUSSING SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	9.25

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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,	0.00	0.20
				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		
	DMC	L210	A104	REQUEST) 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	0.05	8.25
	DMC	L210	A104	REQUEST) 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	0.05	8.25
	DMC	L210	A104	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
	DMC	L210	A102	CLAIM NO./FILE PER CARRIER REQUEST) RESEARCH DOCTRINES OF ISSUE	0.05	8.25

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			PRECIDION AND OLAIM PRECIDION RE	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	,		
			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	0.03	0.23
			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	0.00	00.70
			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:		
			(TIME SPLIT WITH OTHER CLAIM	0.05	0.05
			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: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	Hours 0.05	8.25
07/18/2016	PCB	L210	A104	REVIEW/ANALYZE NEW CD STATUTE AND CLIENTS' RESPONSE TO THE CHAPTER 40 NOTICE 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	0.45	74.05
	DMC	L210	A103	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.45	74.25
	DMC	L210	A103	REQUEST) DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FOURTH CLAIM FOR RELIEF - SUPPRESSION OF EVIDENCE/SPOLIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.30	49.50

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

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				COUNSEL) RE: CLAIMANT'S DEMAND FOR	Hours	
	DMC	L160	A104	CHAPTER 40 MEDIATION AND PROPOSED STRATEGIES RELATING TO SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.10	16.50 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	0.05	9.25
	DMC	L120	A103	CARRIER REQUEST) 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	0.05	8.25
	DMC	L120	A104	CARRIER REQUEST) 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	0.05	8.25
08/10/2016	DMC	L120	A107	REQUEST) COMMUNICATE (OTHER OUTSIDE COUNSEL)	0.05	8.25
08/10/2010	DIVIC	L120	Alor	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		
	DMC	L160	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM DAVID	0.60	99.00

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08/12/2016

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

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08/18/2016

08/19/2016

			DELATING TO CHARTER 40 MEDIATION	Hours	
DMC	L160	A104	RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
DMC	L160	A103	REQUEST) 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	0.05	8.25
DMC	L160	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: REQUEST FOR DEFECT LIST AND COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM	0.05	8.25
DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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 0.05	8.25 8.25
PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR CARRIER FOR VICTAULIC RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
PCB	L190	A104	REQUEST) 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	0.10	18.50
			NO./FILE PER CARRIER REQUEST)	0.05	9.25

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08/23/2016	DMC	L120	A103	DRAFT/REVISE E-MAIL TO J	EFFREY GANZER	Н	ours	
				(CARRIER) RE: (TIME SE CLAIM NO./FILE PER CARRIE	PLIT WITH OTHER ER REQUEST)		0.05	8.25
08/24/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL F WILLIAMS (ASSOCIATION'S DAVID CASTILLO OF JAMS (COPY TO ALL COUNSEL R E RELATING TO CHAPTER 40 (TIME SPLIT WITH OTHER C	COUNSEL) TO (MEDIATOR) WITH E: STRATEGIES MEDIATION.			
	DMC	L160	A104	PER CARRIER REQUEST)	ROM DAVID AMS OF JAMS ALL COUNSEL		0.05	8.25
	DMC	L160	A103	MEDIATION.(TIME SPLIT WIT NO./FILE PER CARRIER REC DRAFT/REVISE E-MAIL TO R SCHUMACHER AND THOMA (COUNSEL FOR VICTAULIC)	QUEST) ROBERT S LYNN		0.05	8.25
	DMC	L160	A103	RELATING TO CHAPTER 40 (TIME SPLIT WITH OTHER C PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO C (COUNSEL FOR CULLIGAN) RELATING TO CHAPTER 40	CARL HOUSTON RE: STRATEGIES		0.05	8.25
	DMC	L160	A104	(TIME SPLIT WITH OTHER C PER CARRIER REQUEST) REVIEW/ANALYZE RESPON THOMAS LYNN (COUNSEL F	SE E-MAIL FROM FOR VICTAULIC)		0.05	8.25
	DMC	L160	A104	RE: STRATEGIES RELATING MEDIATION. (TIME SPLIT WI NO./FILE PER CARRIER REC REVIEW/ANALYZE RESPON: CARL HOUSTON (COUNSEL RE: STRATEGIES RELATING	TH OTHER CLAIM QUEST) SE E-MAIL FROM FOR CULLIGAN)		0.05	8.25
				MEDIATION. (TIME SPLIT WINO./FILE PER CARRIER REC For Current Services Rendere	QUEST)	_	0.05 5.30	8.25 2,549.00
				Recapitulation				
<u>Timekeepe</u>				Title	Hours	Rate	ው	Total
Peter C. Bro Jennifer Ve				PARTNER PARALEGAL	2.10 0.10	\$185.00 95.00	\$3	888.50 9.50
Darlene M.				ASSOCIATE	12.95	95.00 165.00	2 1	9.50 36.75
Danone W.	Jai 1101			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	12.00	100.00	۷, ۱	55.76

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	e <u>keeper</u> nel A. Bounds			<u>Title</u> PARALEGAL	<u>Hours</u> 0.15	<u>Rate</u> 95.00	<u>Total</u> 14.25			
	<u>Expenses</u>									
06/01/2	016	L100	E123	OTHER PROFESSION CONSULTANTS, INC. (INVOICE NO.: 30054)	(CONSULTATION SE	RVICES)	60.00			
06/30/2	016	L100	E101	REPRODUCTION COS		(46				
07/31/2	016	L100	E101		STS FOR JULY 2016 ((132	1.84 5.28			
08/01/2	016	L100	E123	PAGES AT .08/PAGE) OTHER PROFESSION KNEPPERS & ASSOC		I TING	5.26			
08/31/2	016	L100	E101	SERVICES) (INVOICE	NO.: 1119903)		457.50			
00/01/2	.010	L100	LIUI	PAGES AT .08/PAGE)	51010KA0000120	710 (130	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 Ar	nounts					
	<u>0</u> 10,978	<u>-30</u> .79		<u>1-60</u> <u>61-90</u> 0.00	<u>91-120</u> 0.00	<u>121-180</u> 0.00	<u>181+</u> 4,172.61			
				Task Code Rec	apitulation					
L100 L110 L120 L160 L190 L100	L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION 0.00 L110 FACT INVESTIGATION/DEVELOPMENT 46.25 L120 ANALYSIS/STRATEGY 1272.00 L160 SETTLEMENT/NON-BINDING ADR 211.25 L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION 92.50									
L210	PLEADINGS		OTIO::	AND OUR WOOD		884.75	0.00			
L250 L200	OTHER WRI		_	S AND SUBMISSIONS D MOTIONS		$\frac{18.50}{903.25}$	$\frac{0.00}{0.00}$			
L320 L300	DOCUMENT		JCTION			$\frac{23.75}{23.75}$	0.00			

ESIS Dallas AGL Claims

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> 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

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Jersey City NJ 07302

CHUBB INSURANCE

10 Exchange Place

Attn: Jeff Ganzer

9th floor

Panorama Tower I 48062208278589 PANORAMA TOWER I

Fees

03/21/2016	РСВ	L120	A108	COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) RE:	Hours	
	РСВ	L130	A108	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) RE:	0.20	35.00
	РСВ	L340	A108	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH PERSONAL COUNSEL FOR M.J. DEAN AND PERSONAL COUNSEL FOR THE DEVELOPER (2 CALLS) RE:	0.10	17.50
	PCB	L340	A107	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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 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)	Hours 0.15 0.25	26.25 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		
	PCB	L130	A108	CARRIER REQUEST) 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	0.20	35.00
	LK	L320	A104	CARRIER REQUEST) 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	0.25	43.75
	LK	L320	A104	PER CARRIER REQUEST) 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	0.40	48.00

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Statement No:

				Hours	
			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		
LK	L320	A104	PER CARRIER REQUEST) REVIEW/ANALYZE PLAINTIFF'S FORTY-FIFTH THROUGH FORTY SIXTH PRODUCTION OF DOCUMENTS- COMPLAINT & REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.20	24.00
LK	L320	A104	CARRIER REQUEST) 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	0.30	36.00
LK	L320	A104	PER CARRIER REQUEST) 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.	0.20	24.00
LK	L320	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.30	36.00

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	LK	L320	A104	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) 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	Hours 0.35	42.00
				ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.40	48.00
03/24/2016	LK	L320		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) REVIEW/ANALYZE MJ DEAN'S FOURTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FOURTH BATCH, RE: TO LOCATE ANY AND ALL INFORMATION	0.45	54.00
				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		

CHUBB INSURANCE

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				Hours	
LK	L320	A104	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	0.35	42.00
LK	L320	A104	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) 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	0.45	54.00
LK	L320	A104	PURSUANT TO SUPERVISING ATTORNEY'S INSTRUCTIONS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE MJ DEAN'S SEVENTH PRODUCTION OF DOCUMENTS- SEVENTH JOB FILE BATCH, RE: ANALYSIS OF VARIOUS SUBCONTRACTOR CONTRACTS AND JOBFILE 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	0.40	48.00

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LK	L320	A104	INFORMATION, RE: OLDCASTLE, INC. AND OLDCASTLE BUILDING ENVELOPE, IN PREPARATION FOR NRS CHAPTER 40	Hours 0.45	54.00
PCB	L390	A104	THE PROJECT AND THE CHAPTER 40 NOTICE IN PREPARATION FOR ATTENDANCE AT SITE INSPECTION WITH EXPERTS. (TIME	0.30	36.00
PCB	L390	A109	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION WITH CLIENTS' EXPERTS (NO TRAVEL TIME INCLUDED IN THIS ENTRY). (TIME SPLIT WITH OTHER CLAIM NO./FILE	0.30	52.50
РСВ	L390	A109	PER CARRIER REQUEST) APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION (SEPARATE NON-BILLABLE	2.15	376.25
PCB	L130	A108	TRAVEL TIME). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.60	n/c
JBV	L130	A108	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE WITH MADSEN, KNEPPERS & ASSOCIATES, RE:	0.10	17.50
JBV	L110	A108	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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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			(TIME OBJET MUTU OTHER OF AIM NO (EU E	Hours	
JBV	L110	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW	0.05	6.00
			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		
JBV	L110	A103	CORRESPONDENCE SERVED ON CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL CORRESPONDENCE	0.05	6.00
			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	6.00
JBV	L110	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		
JBV	L110	A104	OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL	0.05	6.00
			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		

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JBV	L110	A104	NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CORPORATE INFORMATION FOR AQUAMATIC, RE: VERIFYING PROPER AND LEGAL LOCATION	Hours 0.05	6.00
JBV	L130	A108	TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE WITH CLIENT'S EXPERT, SHELLY ROBBINS, RE:	0.05	6.00
JBV	L130	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.10	12.00
JBV	L110	A104	WITHIN PLAINTIFF'S INITIAL PRODUCTION OF DOCUMENTS (P0000001-P0000856), 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	0.05	6.00
JBV	L110	A104	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) REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SECOND PRODUCTION OF DOCUMENTS (P0000857-P0001544), RE:	0.10	12.00

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JBV

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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 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 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 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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> Hours 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 0.05 6.00 REQUEST) **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 0.05 6.00 REQUEST) 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

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				Hours	
			DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.45	40.00
JBV	L110	A104	REQUEST) 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	0.15	18.00
JBV	L110	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.20	24.00
JBV	L110	A104	REQUEST) 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	0.15	18.00

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				Hours	
JBV	L110	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.20	24.00
JBV	L110	A104	REQUEST) 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	0.10	12.00
JBV	L110	A104	REQUEST) 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	0.05	6.00
JBV	L110	A104	REQUEST) REVIEW/ANALYZE DOCUMENTS DISCLOSED	0.05	6.00

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			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	Hours	
JBV	L110	A104	SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	12.00
JBV	L110	A104	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) REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SEVENTEENTH PRODUCTION OF DOCUMENTS (P0013411-P0013574), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO	0.15	18.00
JBV	L110	A104	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) REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S EIGHTEENTH PRODUCTION OF DOCUMENTS (P0013575-P13684), RE: DETERMINING IF ANY	0.05	6.00

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				Hours	
			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	0.00	0.00
JBV	L110	A104	REQUEST) 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	0.15	18.00
JBV	L110	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	6.00

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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 L110 JBV 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 0.05 6.00 REQUEST) 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	Hours	
JBV	L110	A104	PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	6.00
			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		
JBV	L110	A104	REQUEST) 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	0.15	18.00
			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		
JBV	L110	A104	SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	12.00

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				Hours	
JBV	L110	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	6.00
JBV	L110	A104	REQUEST) 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	0.05	6.00
JBV	L110	A104	REQUEST)	0.15	18.00
JBV	L110	A104	REQUEST) REVIEW/ANALYZE DOCUMENTS DISCLOSED	0.05	6.00

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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

A104 COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:



OTHER CLAIM NO./FILE PER CARRIER REQUEST)

0.10 12.00

JBV L110 A104

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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				Hours	
			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		
JBV	L110	A104	REQUEST) 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	0.05	6.00
JBV	L110	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.20	24.00

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				Hours	
JBV	L110	A104	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) 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	0.10	12.00
JBV	L110	A104	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) 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	0.35	42.00
JBV	L110	A104	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) REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTIETH PRODUCTION OF DOCUMENTS (P0061534-61655), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATIONSUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW	0.15	18.00

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			DEFECT ALL FOATIONS DEFCENTED BY	Hours	
JBV	L110	A104	DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	12.00
			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		
JBV	L110	A104	REQUEST) REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FORTY-EIGHTH PRODUCTION OF DOCUMENTS (P0054588-61329), RE: DETERMINING IF ANY	0.05	6.00
			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		
JBV	L110	A104	REQUEST) 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.	0.45	54.00
JBV	L110	A108	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE WITH CLIENT'S POTENTIAL	0.10	12.00

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			EXPERT, KEN REID, RE:	Hours	
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
JBV	L110	A104	REQUEST) REVIEW/ANALYZE PLAINTIFF'S NRS CHAPTER 40 CORRESPONDENCE TO CLIENT, MJ DEAN DATED FEBRUARY 24, 2016. RE: DETERMINING DEFECT ALLEGATIONS LISTED WITHIN, IN PREPARATION FOR INCLUDING SAID DEFECT ALLEGATIONS WITHIN CHAPTER 40 CORRESPONDENCE TO SUBCONTRACTORS	0.10	12.00
JBV	L110	A104	INFORMATION FOR TEXAS WALL SYSTEMS, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS 40.646. (TIME SPLIT	0.15	18.00
JBV	L110	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO TEXAS WALL SYSTEMS, 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	0.05	6.00
JBV	L110	A104	CARRIER REQUEST)	0.05	6.00
JBV	L110	A103	REQUEST)	0.05	6.00

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			CORRECTION DENICE TO DOMEARS	Hours	
JBV	L110	A104	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) REVIEW/ANALYZE CORPORATE INFORMATION FOR INSULPRO PROJECTS,	0.05	6.00
			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		
JBV	L110	A104	CARRIER REQUEST) 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	0.05	6.00
JBV	L110	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	6.00
JBV	L110	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CORPORATE INFORMATION FOR VICTAULIC, RE: VERIFYING PROPER AND LEGAL LOCATION TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF CLIENT, PURSUANT TO NRS	0.05	6.00
JBV	L110	A103	40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO VICTAULIC, RE:	0.05	6.00

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

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03/28/2016

				Hours	
JBV	L110	A103	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) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN PURE WATER ALSO KNOWN AS CULLIGAN WATER CONDITIONING OF LAS VEGAS, NEVADA, RE: PROVIDING INFORMATION RELEVANT TO	0.05	6.00
			RECENTLY RECEIVED DEFECT ALLEGATIONS FROM PLAINTIFF'S COUNSEL, PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
JBV	L110	A103	REQUEST) 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	0.05	6.00
PCB	L250	A104	REQUEST) 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)	0.05	6.00
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		
PCB	L240	A104	REQUEST) REVIEW/ANALYZE STATUTORY PROVISIONS IN CONJUNCTION WITH PLAINTIFF'S NEW CHAPTER 40 NOTICE	0.10	17.50

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					Hours	
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.35	61.25
03/29/2016	PCB 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) COMMUNICATE (OTHER EXTERNAL) WITH MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.20	35.00
	PCB	L340	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE EMAIL FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.10	17.50
				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) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH JORGE RAMIREZ (COUNSEL FOR CULLIGAN) RE: INITIAL DISCUSSION OF THE CLAIMS PERTAINING TO CULLIGAN'S	0.05	8.75
	LK	L320	A103	FERROUS PARTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE TO FLIPPINS	0.10	17.50
	LK	L320	A103	TRENCHING. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO INSULPRO PROJECTS, RE: AMENDED	0.10	12.00
	LK	L320	A103	NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO OLD	0.10	12.00

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				Hours	
LK	L320	A103	CASTLE, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: AMENDED NEVADA REVISED STATUTE	0.10	12.00
LK	L320	A103	CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	12.00
LK	L320	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO TEXAS WALL SYSTEMS, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40	0.10	12.00
LK	L320	A103	LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO VICTAULIC, INC., RE: AMENDED NEVADA	0.10	12.00
JBV	L110	A104	CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA	0.10	12.00
			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	,		

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				TOWERS I, LLC AND PANORAMA TOWERS II,	Hours	
	JBV	L110	A103	LLC, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	12.00

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04/07/2016

			TOWERS LAND II AS WELL AS MUDEAN	Hours	
JBV	L320	A104	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) 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	0.05	6.00
JBV	L320	A104	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) 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	0.05	6.00
			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
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	0.03	0.73
JBV	L320	A104	CARRIER REQUEST) REVIEW/ANALYZE RESPONSE RECEIVED	0.05	6.00

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

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	JBV	L320	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	Hours 0.05	6.00
	JBV	L320	A103	SUBCONTRACTOR/MANUFACTURER/SUPPLIER, IN COMPLIANCE WITH NRS 40.646. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.05 0.15	6.00
04/12/2016		L120		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) APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (ARCHITECT) RE:	0.15	26.25
	PCB	L130	A109	(ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.20	35.00
	РСВ	L130	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS PROVIDED	0.20	35.00

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				BY EXPERT (MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	Hours 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 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.10	12.00
	JBV	L320	A103	REQUEST) 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	0.10	12.00
	JBV	L320	A104	REQUEST) 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	0.10	12.00
	JBV	L320	A104	REQUEST) 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	0.05	6.00

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				PREPARATION FOR PROVIDING FORD CONTRACTING AS SUBCONTRACTOR HOLDING A RELEVANT SCOPE OF WORK TO	Hours	
				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: (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 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER		
	JBV	L320	A104	CARRIER REQUEST) 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	0.25	43.75
	JBV	L320	A104	PER CARRIER REQUEST) 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	0.05	6.00
	JBV	L320	A104	REQUEST) REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC.,	0.05	6.00

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Panorama Tower I 48062208278589 PANORAMA TOWER I

04/25/2016

			RE: INABILITY TO SERVE CHAPTER 40	Hours	
JBV	L320	A103	CORRESPONDENCE FROM PLAINTIFF'S COUNSEL, IN PREPARATION FOR DETERMINING NEXT LOCATION TO ATTEMPT SERVICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS,	0.05	6.00
JBV	L320	A104	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) REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE: DETERMINING WHICH SUBCONTRACTORS WITHIN THE SCOPE OF ALLEGED DEFECTS MADE BY PLAINTIFF'S	0.05	6.00
JBV	L320	A103	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) DRAFT/REVISE OCIP COVERAGE INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND	0.05	6.00
			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
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	0.00	0.70

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				40 PRELIMINARY LIST OF CONSTRUCTIONAL	Hours	
	RAB	L320	A103	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) DRAFT/REVISE (BEGIN) DEFECT LIST SUMMARY AND COST OF REPAIR SUMMARY,	0.35	42.00
				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		40.00
	RAB	L110	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL TO JACOB HOUMAND AND VICTORIA NELSON, COUNSEL FOR OUR CLIENT'S IN BANKRUPTCY COURT, RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.10	12.00
	DMC	L120	A103	REQUEST) DRAFT/REVISE CORRESPONDENCE TO ENDURANCE SPECIALTY INSURANCE COMPANY (CLIENTS' EXCESS CARRIER) RE:	0.05	6.00
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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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			TO ALLEGED CHAPTER 40 DEFECTS AS	Hours	
	DMC L1	120 A107	REQUIRED BY STATUTE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	26.25
			LITIGATION AND HIS POSSIBLE INTEREST IN A UNITED DEFENSE STRATEGY. v	0.15	26.25
05/02/2016	DMC L1	120 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		
	DMC L1	120 A104	NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC L1	120 A104	NO./FILE PER CARRIER REQUEST) 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	0.20	35.00
	DMC L1	120 A104	NO./FILE PER CARRIER REQUEST) 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	0.25	43.75
	DMC L1	120 A104	PER CARRIER REQUEST) 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	0.25	43.75

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			TO CARRIER AND CLIENTS. (TIME SPLIT	Hours	
DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
DMC	L120	A104	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	0.10	17.50
DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (BEGIN) INITIAL REPORT TO CARRIERS RE: (TIME SPLIT	0.20	35.00
DMC	L120	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.15	26.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.15	26.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.45	78.75

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				Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.35	61.25
DMC	L120	A103	TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:	0.30	52.50
RAB	L110	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE LITIGATION SERVICES DOCUMENTS, RE: DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES IN	0.25	43.75
RAB	L110	A103	SERVICES, RE: DEPOSITORY INDEX DOCUMENTS RELATING TO ALL PRIOR	0.10	12.00
RAB	L110	A104	LITIGATION SERVICES, RE: DEPOSITORY	0.05	6.00
RAB	L110	A103	INDEX DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES IN PREPARATION FOR RESPONSE EMAIL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE EMAIL TO LITIGATION SERVICES, RE: INFORMATION RELATING TO DEPOSITORY INDEX	0.05	6.00
RAB	L110	A104	DOCUMENTS RELATING TO ALL PRIOR PANORAMA TOWER CASES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS FROM LITIGATION SERVICES, RE: DEPOSITORY	0.05	6.00

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				INDEX RELATING TO PRIOR PANORAMA TOWER CASES IN PREPARATION FOR ASSISTING THE ATTORNEY WITH THE DISCOVERY PROCESS. (TIME SPLIT WITH	Hours	
				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: (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:		
	PCB	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE PORTIONS OF AB 125 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.10	17.50
05/16/2016	PCB	L250	A104	CARRIER REQUEST) REVIEW/ANALYZE PORTIONS OF AB 125 TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.25	43.75
05/20/2016	RAB	L110	A104	CARRIER REQUEST) REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO	0.45	78.75

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				4525 DEAN MARTIN DRIVE IN ORDER TO	Hours	
	RAB	L110	A104	ASSIST THE ATTORNEY WITH HER ANALYSIS AND CHAPTER 40 CORRESPONDENCES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.40	48.00 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		
	DMC	L120	A103	PER CARRIER REQUEST) 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 LABILITY (5 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM	0.65	113.75
	DMC	L330	A101	NO./FILE PER CARRIER REQUEST)	0.80	140.00
05/24/2016	РСВ	L250	A103	DRAFT/REVISE (CONTINUE) RESPONSE TO	0.05	8.75
				PLAINTIFF'S CHAPTER 40 NOTICE RE: ADDITIONAL DISCUSSION OF THE		

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			APPLICATION OF AB 12 (TIME SPLIT WITH OTH PER CARRIER REQUES	ER CLAIM NO./FILE		0.15 26.25
			For Current Services Rei Total Non-billable Hours	,		27.95 0.60 27.95 4,044.25
			Recapitulati	ion		
Timekeeper Peter C. Brown Jennifer Vela Lexi Kim Darlene M. Cartier Rachel A. Bounds			Title PARTNER PARALEGAL PARALEGAL ASSOCIATE PARALEGAL	Hours 6.95 8.20 5.25 5.60 1.95	Rate \$175.00 120.00 120.00 175.00 120.00	Total \$1,216.25 984.00 630.00 980.00 234.00
			Expenses	<u> </u>		
03/31/2016	L100	E101	REPRODUCTION COST PAGES AT .08/PAGE)	S FOR MARCH 2010	6 (1927	77.08
04/30/2016	L100	E101	REPRODUCTION COST	S FOR APRIL 2016	(141	E 64
05/31/2016	L100	E101	PAGES AT .08/PAGE) REPRODUCTION COST	S FOR MAY 2016 (1	141	5.64
			PAGES AT .08/PAGE) Total Expenses			$\frac{45.64}{128.36}$
			Total Current Work			4,172.61
			Previous Balance before	Adjustments		\$25,820.20
03/06/2017			WRITE-OFF (RE-ENTER BETWEEN 1287.551 AN		Г	-21,690.55
			Previous Balance			\$4,129.65
			Balance Due			\$8,302.26
_			Past Due Amo			
8,302	2.26		<u>1-60</u> <u>61-90</u> 0.00	91-120 0.00	121-180 0.00	<u>181+</u> 0.00
			Task Code Recap	oitulation		
	STIGATION STRATEO	ON/DEV SY	ELOPMENT AND ADMINIS	STRATION		.75 0.00

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L190	OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	<u>Fees</u> 35.00	Expenses 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

Final Statement Run Totals 03/01/2017

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

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

TAX ID # 33-0747275

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

USA

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

Fees

						
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	Hours	
	DMC	L160	A103	CLIENT AND CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO ALL SUBCONTRACTOR COUNSEL RE: STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF	0.05	8.25
	DMC	L160	A103	SETTLEMENT DEMAND FROM THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO MARTIN LITTLE (COUNSEL FOR CLIENT MJ DEAN) RE:	0.05	8.25
	DMC	L160	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFF GANZER (CARRIER) RE:	0.05	8.25
	DMC	L160	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM	0.05	8.25

AA2949 0240

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			CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: CASE STATUS AND STRATEGIES RELATING TO UPCOMING CHAPTER 40 MEDIATION AND STATUS OF SETTLEMENT	Hours	
			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: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	9.25
09/06/2016	DMC L120		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) REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM TRACY JIN OF MKA	0.05	8.25
	DMC L120	A104	(CLIENTS' ARCHITECTURAL EXPERT) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25

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					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		
	DMC	L160	A108	PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CARRIER) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.05	8.25
	DMC	L160	A104	REQUEST) 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	0.15	24.75
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
	DMC	L160	A103	REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: (TIME SPLIT WITH OTHER CLAIM	0.05	8.25

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	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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)	Hours 0.05 0.15	8.25 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	0.05	0.25
	DMC	L160	A108	PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH ASHLEY ALLARD (CLIENTS' ARCHITECTURAL EXPERT) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.05	8.25
	DMC	L160	A103	REQUEST)	0.10	16.50
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM	0.10	16.50
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING	0.15	24.75

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

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

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				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	Hours	
	DMC	L120	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE:	0.15	24.75
				(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:		
	RAB	L130	A108	OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE:	0.05	4.75
	RAB	L130	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE:	0.05	4.75
	DMC	L150	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE PHASE I LITIGATION BUDGET	0.05	4.75
	РСВ	L120	A104	PURSUANT TO REQUEST BY CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION	0.20	33.00
				THE TANGENTIAL ENTOPHICIT		

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					Hours	
				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		
	RAB	L140	A103	CARRIER REQUEST) DRAFT/REVISE MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME	0.10	9.50
	RAB	L140	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S EXPERT	0.05	4.75
	RAB	L140	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT MADSEN, KNEPPERS & ASSOCIATES, INC., RE:	0.05	4.75
	RAB	L140	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05 0.05	4.75 4.75
09/19/2016	РСВ	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE:		

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			(TIME SPLIT WITH OTHER	Hours	
РСВ	L250	A103	FILE IN SAME CASE - "PANORAMA II" - 1287.551). DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF RE:	0.10	18.50
РСВ	L160	A101	(TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER II" - 1287.551). PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION RE:	0.40	74.00
DMC	L160	A104	(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551). REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE:	0.50	92.50
DMC	L160	A104	STRATEGIES FOR UPCOMING CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE:	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
DMC	L160	A103	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).	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	24.75

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09/21/2016

DMC	L160	A 1 0 2	DRAFT/REVISE SEPARATE	Hours	
DIVIC	L100	A103	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		
DMC	L160	A104	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	24.75
DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
DMC	L160	A104	CARRIER REQUEST) 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 0.05	8.25 8.25
PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE:		

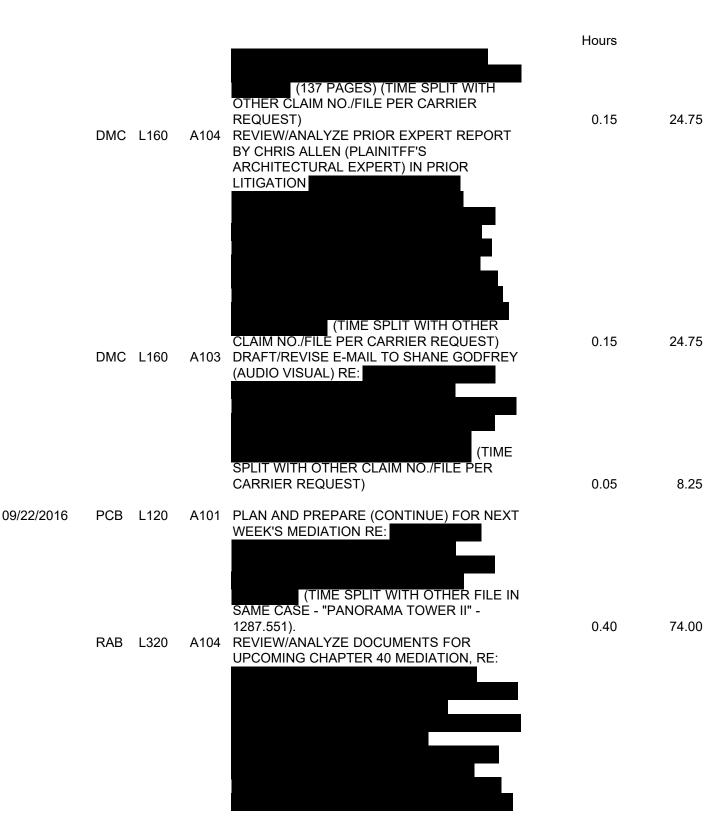
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		Hours	
	(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" -		
DMC L160 A103	1287.551) (NO TRAVEL TIME INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PACE AT BWB&O'S OFFICE). DRAFT/REVISE E-MAIL TO MARTIN LITTLE	0.60	111.00
	(PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: (TIME		
DMC L160 A109	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND MEETING WITH SHANE STREAM OF HOLO DISCOVERY AND MICHELLE ROBBINS OF MKA (CLIENTS'	0.05	8.25
	ARCHITECTURAL EXPERT) RE:		
	(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	0.00	02.00
	UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER		
DMC L160 A103	CARRIER REQUEST) DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL) RE:	0.05	8.25
	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER		
DMC L160 A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM ASHLEY ALLARD OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.25

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

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

					Hours	
09/24/2016	DMC	L120	A109	APPEAR FOR/ATTEND WITH SHANE GODFREY (AUDIO VISUAL) AND MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: (ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH		
	DMC	L120	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	1.05	173.25
	DMC	L120	A103	REQUEST) 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	0.40	66.00
	РСВ	L120	A101	NO./FILE PER CARRIER REQUEST) PLAN AND PREPARE FOR TODAY'S MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING	0.05	8.25

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				TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE:	Hours	
	PCB	L120	A109	TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551). APPEAR FOR/ATTEND MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE:	0.80	148.00
				(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551) (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		
	РСВ	L160	A101	(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.551). PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE:	1.10	203.50
	РСВ	L160	A101	(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.581) (NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE). PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE: (TIME SPLIT WITH OTHER FILE IN SAME CASE -	2.10	388.50
09/26/2016	РСВ	L120	A101	"PANORAMA II" - 1287.551). PLAN AND PREPARE (CONTINUE) FOR TODAY'S MEDIATION RE:	0.40	74.00

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				Hours	
РСВ	L160	A109	(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - PANORAMA TOWER II"). APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE -	0.40	74.00
РСВ	L160	A109	1287.551 - "PANORAMA TOWER II")(NO TRAVEL TIME INCLUDED IN THIS ENTRY). APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE -	2.00	370.00
DMC	L160	A109	1287.551 - "PANORAMA TOWER II"). TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S	0.50	n/c
DMC	L160	A109	MEDIATION (ATTENDANCE BY DMC AND PCB APPROVED BY CARRIER) (TIME SPLIT WITH	0.30	n/c
DMC	L160	A109	OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE	2.00	330.00
DMC	L120	A104	PURSUANT TO CARRIER'S REQUEST)	0.40	n/c
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE:	0.10	16.50
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE:	0.05	8.25

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				Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE E-MAIL TO ENDURANCE CLAIMS (EXCESS CARRIER) RE:	0.05	8.25
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE:	0.10	16.50
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE:	0.05	8.25
DMC	L210	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) 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)	0.05	8.25 82.50
			NEQUEST)	0.50	02.50

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

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	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	Hours	
DMC L210 A	SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 103 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	0.40	66.00
DMC L210 A	SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 103 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	0.40	66.00
DMC L210 A	CARRIER'S REQUEST) 103 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	0.20	33.00
DMC L210 A	REQUEST) 103 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	0.10	16.50
DMC L210 A	CARRIER'S REQUEST) 103 DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A FIFTH CLAIM FOR	0.10	16.50

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			RELIEF FOR BREACH OF CONTRACT FOR	Hours	
DMC	L210	A103	THE ASSOCIATION'S BREACH OF THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SIXTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO	0.30	49.50
DMC	L210	A103	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) DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SEVENTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO	0.50	82.50
DMC	L120	A104	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) REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE:	0.50	82.50
DMC	L120	A104	TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE:	0.05	8.25
DMC	L250	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE NOTICE OF PRIOR RELATED LITIGATION AND EX PARTE REQUEST FOR ASSIGNMENT TO THE HONORABLE SUSAN JOHNSON (TIME SPLIT WITH OTHER CLAIM	0.05	8.25

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

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	RAB	L320	A104	CARRIER'S REQUEST) REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40 MEDIATION, RE:	Hours 0.40	66.00
	PCB	L210	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 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").	0.15 0.10	14.25 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		
	RAB	L320	A103	IS SPLIT WITH THE OTHER FILE 1287.558) DRAFT/REVISE (CONTINUE) MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: ADDING ADDITIONAL INFORMATION RELATING TO	0.10	9.50
	DMC	L120	A104	FINAL INSPECTION REPORTS. (TIME IS SPLIT WITH THE OTHER FILE 1287.558) REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE:	0.10	9.50
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE REVISE INITIAL LITIGATION BUDGET TO INCLUDE ADDITIONAL MOTION PRACTICE PURSUANT TO REQUEST BY CARRIER AT THE CHAPTER 40 MEDIATION	0.05	8.25
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE:	0.10	16.50

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

09/29/2016

		Hours	
DMC L120 A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE:	0.10	16.50
DMC L160 A107	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR OLD CASTLE) RE: OUTCOME OF CHAPTER 40 MEDIATION, INCLUDING WHETHER THE	0.10	16.50
DMC L120 A104	ASSOCIATION MADE ANY SETTLEMENT DEMAND AND WHETHER ANY SETTLEMENT WAS REACHED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE:	0.10	16.50
DMC L120 A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE:	0.05	8.25
DMC L210 A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25

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	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS (CARRIER) RE:	Hours 0.05	8.25
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRYDON OF ESIS (CARRIER) RE:	0.05	8.25
				(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		
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
	DMC	L160	A104	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
				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: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
	DMC	L120	A103	REQUEST) DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.25 8.25
10/21/2016	RAB	L340	A104	REVIEW/ANALYZE POWER POINT PRESENTATION DOCUMENTS, RE: (TIME SPLIT WITH OTHER CLAIM		
	RAB	L340	A104	NO./FILE PER CARRIER REQUEST) 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 9.50
10/26/2016	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE:		

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	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER (CARRIER) RE:	Hours 0.05	8.25
				(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: (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	0.40	0.50
	RAB	L320	A103	PER CARRIER REQUEST) 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 0.10	9.50 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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			ACTION TO THE HOA'S	CARRIER, AND THE		Hours	
РСВ	L190	A103	TIMING OF HIS CLIENT RESPONSIVE PLEADIN OTHER FILE IN SAME (C-1287.551). DRAFT/REVISE EMAIL THE HOA RE: CONFIRM AGREEMENTS REACH! MORNING'S PHONE CO SPLIT WITH OTHER FIL PANORAMA II - 1287.55	"S FILING OF A IG (TIME SPLIT WITH CASE - PANORAMA II TO COUNSEL FOR MATION OF ED DURING THIS DNVERSATION. (TIME LE IN SAME CASE -		0.20	37.00 18.50
			For Current Services Rel Total Non-billable Hours	•		29.00 1.20	4,894.50
						1.20	
Timekeeper Peter C. Brown Darlene M. Cartier Rachel A. Bounds			Recapitulat Title PARTNER ASSOCIATE PARALEGAL	ion <u>Hours</u> 10.90 16.55 1.55	Rate \$185.00 165.00 95.00		<u>Total</u> ,016.50 ,730.75 147.25
			Expenses	<u>s</u>			
09/26/2016	L100	E109	LOCAL TRAVEL (8799) MILES AT \$.54/MILE FC 1287.558				7.88
09/29/2016 09/30/2016	L100 L100		WIZ-NET (DEMAND FOR REPRODUCTION COST	TS FOR SEPTEMBER	2016		1.75
10/11/2016	L100	E112	(1090 PAGES 0.08/PAG WIZ-NET (SUMMONS P CONDOMINIUM UNIT C	PÁNORAMA TOWERS	JNI)		43.60 1.75
10/31/2016	L100	E101	REPRODUCTION COST PAGES 0.08/PAGE)				0.48
11/03/2016	L100	E123	,	ORÝ SERVICES) (INV	OICE		0.10
11/30/2016	L100	E101	1287.558) (TRIAL PREP REPRODUCTION COST	ARATION)	016		693.75
			(15 PAGES 0.08/PAGE) Total Expenses				$\frac{0.60}{749.81}$
			Total Current Work				5,644.31
			Previous Balance				\$15,151.40
			Balance Due				\$20,795.71

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<u>0-30</u>	<u>31-60</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	4,172.61

Task Code Recapitulation

		Fees	Expenses
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

Final Statement Run Totals 03/03/2017

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

0268 AA2977

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

TAX ID # 33-0747275

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

Attn: Jeff Ganzer

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Fees

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	Hours	
	DMC	L120	A104	REQUEST) 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)	0.10	9.50 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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				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	Hours	9.25
06/23/2016	DMC	L120	A104	CARRIER REQUEST) 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 0.05	8.25 8.25
06/29/2016	PCB	L120	A103	DRAFT/REVISE (FINALIZE) FIRST SUIT REPORT RE:		
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY:	0.60	111.00
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY:	0.60	99.00
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: CLAIM SUMMARY: (TIME SPLIT WITH	0.45	74.25
	DMC	L120	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE BRIEF RESEARCH RE: EDWARD SONG AND SCOTT WILLIAMS TO DETERMINE THEIR BACKGROUND AND EXPERIENCE IN PREPARATION FOR	0.10	16.50
	DMC	L120	A103	DRAFTING INITIAL REPORT TO CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT	0.15	24.75

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			TO CARRIER RE:	Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.20	33.00
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.10	16.50
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: (TIME SPLIT WITH	0.35	57.75
DMC	L120	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.35	57.75
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: (TIME	0.60	99.00
DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
			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:	Hours	
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.45	74.25
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.40	66.00
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.30	49.50
DMC	L120	A103	REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.10	16.50
DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:	0.05	8.25
			(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:	Hours	
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.45	74.25 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		
	DMC	L120	A107	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	0.25	46.25
	DMC	L120	A103	REQUEST) DRAFT/REVISE E-MAIL TO WENDY JENSON (CLAIMANT'S COUNSEL) RE: STRATEGIES RELATING TO CHAPTER 40 PRE-LITIGATION PROCESS. (TIME SPLIT WITH OTHER CLAIM	0.25	41.25
	DMC	L120	A104	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
				REQUEST)	0.05	8.25

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5140	1.400	4404	DEVIEWANALYZE E MAII EDOM COOTT	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		
DMC	1.420	A404	REQUEST)	0.05	8.25
DIVIC	L120	A104	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	0.05	0.05
DMC	L120	A104	NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM SCOTT	0.05	8.25
			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		
DMC	L120	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM SCOTT	0.15	24.75
			WILLIAMS (CLAIMANT'S COUNSEL) RE: SUBCONTRACTORS CLAIMANT PLACED ON		
			NOTICE OF THE CLAIM AND REQUEST FOR		

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07/01/2016

			INFORMATION WE HAVE RELATING TO SAME, TO DETERMINE WHETHER ANY ACTION OR RESPONSE IS NECESSARY ON	Hours	
РСВ	L110	A104	BEHALF OF CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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.	0.05	8.25
PCB	L120	A101	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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:	0.10	18.50
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	55.50
PCB	L190	A103	DRAFT/REVISE (FINALIZE) NOTICE OF CLAIM/TENDER OF DEFENSE TO ENDURANCE RE:		
PCB	L190	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	18.50
PCB	L110	A107	DISCUSSING SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	9.25

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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: (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, (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		
	DMC	L210	A104	REQUEST) 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	0.05	8.25
	DMC	L210	A104	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
	DMC	L210	A102	CLAIM NO./FILE PER CARRIER REQUEST) RESEARCH DOCTRINES OF ISSUE	0.05	8.25

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			DDECLUCION AND OLAIM DDECLUCION DE	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	,		
			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	0.03	0.23
			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	0.00	00.70
			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:		
			(TIME SPLIT WITH OTHER CLAIM	0.05	0.05
			NO./FILE PER CARRIER REQUEST)	0.05	8.25

CHUBB INSURANCE

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	DMC L21	0 A103	DRAFT/REVISE RESPONSE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) WITH COPY TO MICHAEL DEAN (CLIENT MJ DEAN) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	Hours 0.05	8.25
07/18/2016	PCB L21	0 A104	REVIEW/ANALYZE NEW CD STATUTE AND CLIENTS' RESPONSE TO THE CHAPTER 40 NOTICE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
07/19/2016	RAB L32	0 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 L21	0 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		
	DMC L21	0 A103	CLAIM NO./FILE PER CARRIER REQUEST) 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	0.45	74.25
	DMC L21	0 A103	REQUEST) DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FOURTH CLAIM FOR RELIEF - SUPPRESSION OF EVIDENCE/SPOLIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.30	49.50

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

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				CHAPTER 40 MEDIATION AND PROPOSED	Hours	
	DMC	L160	A104	STRATEGIES RELATING TO SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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)	0.10	16.50 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		
	DMC	L120	A103	CARRIER REQUEST) 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	0.05	8.25
	DMC	L120	A104	CARRIER REQUEST) 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 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		
	DMC	L160	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL	0.60	99.00

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08/12/2016

			COUNSEL RE: PROPOSED STRATEGIES	Hours	
DMC	L160	A104	RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: MEDIATOR'S PROPOSED	0.05	8.25
DMC	L160	A104	STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: CASE STATUS, INCLUDING MANDATORY CHAPTER 40 MEDIATION AND CLAIMS AGAINST HIS	0.05	8.25
DMC	L160	A104	CLIENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED ALTERNATIVE	0.05	8.25
DMC	L160	A104	STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S	0.05	8.25
DMC	L120	A107	PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40	0.05	8.25
			MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
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.	0.00	0.23

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08/18/2016

08/19/2016

08/23/2016

			/TIME COLUE WITH OTHER OF AIM NO /EILE	Hours	
DMC	L160	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: INSPECTIONS OF THE ALLEGED DEFECTS AND CHAPTER 40 MEDIATION. (TIME SPLIT	0.05	8.25
DMC	L160	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
DMC	L160	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: REQUEST FOR DEFECT LIST AND COST OF REPAIR. (TIME SPLIT WITH OTHER CLAIM	0.05	8.25
DMC	L160	A103	NO./FILE PER CARRIER REQUEST) 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 0.05	8.25 8.25
PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR CARRIER FOR VICTAULIC RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	18.50
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
DMC	L120	A103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER		

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				(CARRIER) RE:			Hours	
				(TIME SF CLAIM NO./FILE PER CARRIE	PLIT WITH OTHER ER REQUEST)		0.05	8.25
08/24/2016	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FR WILLIAMS (ASSOCIATION'S O DAVID CASTILLO OF JAMS (COPY TO ALL COUNSEL R E RELATING TO CHAPTER 40 O (TIME SPLIT WITH OTHER C PER CARRIER REQUEST)	COUNSEL) TO MEDIATOR) WITH : STRATEGIES MEDIATION.		0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE E-MAIL FR CASTILLO TO SCOTT WILLIA (ASSOCIATION'S COUNSEL) (MEDIATOR) WITH COPY TO RE: STRATEGIES RELATING MEDIATION.(TIME SPLIT WIT	AMS OF JAMS ALL COUNSEL TO CHAPTER 40 TH OTHER CLAIM			
	DMC	L160	A103	NO./FILE PER CARRIER REC DRAFT/REVISE E-MAIL TO R SCHUMACHER AND THOMA: (COUNSEL FOR VICTAULIC) STRATEGIES RELATING TO MEDIATION. (TIME SPLIT WI	OBERT S LYNN RE: CHAPTER 40		0.05	8.25
	DMC	L160	A103	NO./FILE PER CARRIER REC DRAFT/REVISE E-MAIL TO C (COUNSEL FOR CULLIGAN) RELATING TO CHAPTER 40 (TIME SPLIT WITH OTHER C	NUEST) ARL HOUSTON RE: STRATEGIES MEDIATION.		0.05	8.25
	DMC	L160	A104	PER CARRIER REQUEST) REVIEW/ANALYZE RESPONS THOMAS LYNN (COUNSEL F RE: STRATEGIES RELATING MEDIATION. (TIME SPLIT WI	OR VICTAULIC) TO CHAPTER 40		0.05	8.25
	DMC	L160	A104	NO./FILE PER CARRIER REC REVIEW/ANALYZE RESPONS CARL HOUSTON (COUNSEL RE: STRATEGIES RELATING MEDIATION. (TIME SPLIT WI	SE E-MAIL FROM FOR CULLIGAN) TO CHAPTER 40		0.05	8.25
				NO./FILE PER CARRIER REC			0.05	8.25
				For Current Services Rendered	d		15.30	2,549.00
Timalaanan				Recapitulation	Harris	Dete		Tatal
Timekeeper Peter C. Bro				<u>Title</u> PARTNER		<u>Rate</u> \$185.00	9	<u>Total</u> 3388.50
Jennifer Vela Darlene M. 0				PARALEGAL ASSOCIATE	0.10 12.95	95.00 165.00	2	9.50 ,136.75
Rachel A. Bo				PARALEGAL	0.15	95.00	_	14.25

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Panorama Tower I 48062208278589-A PANORAMA TOWER I

Expenses

					R PROFESSIONAL ULTANTS, INC. (C		SERVICES)	60.00
06/30/2	/30/2016 L100 E101				(INVOICE NO.: 30054) REPRODUCTION COSTS FOR JUNE 2016 (46			
07/31/2	2016	L100	E101		S AT .08/PAGE) ODUCTION COSTS	S FOR IIII V 201	6 (132	1.84
				PAGE:	S AT .08/PAGE)		,	5.28
08/01/2	2016	L100	E123		R PROFESSIONAL PERS & ASSOCIAT			
00/04/6	2046	1.400	E404	SERVI	ICES) (INVOICE NO	D.: 1119903)		457.50
08/31/2	2016	L100	E101		ODUCTION COSTS S AT .08/PAGE)	S FOR AUGUST	2016 (136	5.44
				Total E	Expenses			530.06
				Total (Current Work			3,079.06
				Previo	us Balance			\$8,302.26
				Baland	ce Due			<u>\$11,381.32</u>
					Past Due Amo			
		<u>0-30</u> 11,381.32	_	<u>1-60</u> 0.00	<u>61-90</u> 0.00	<u>91-120</u> 0.00	<u>121-180</u> 0.00	<u>181+</u> 0.00
		,			Task Code Recapi	tulation		
							Fees	Expenses
L100					ENT AND ADMINIS	TRATION	0.00	530.06
L110 L120		T INVESTIGATIO LYSIS/STRATEO		ELOPM	IEN I		46.25 1272.00	0.00 0.00
L120		FLEMENT/NON-		G ADR			211.25	0.00
L190					ELOPMENT & ADM	IINISTRATION	92.50	0.00
L100	CASI	E ASSESSMENT	Γ, DEVE	LOPME	ENT AND ADMINIS	TRATION	1,622.00	530.06
L210	PLEA	ADINGS					884.75	0.00
L250	OTH	ER WRITTEN M	OTIONS	S AND S	SUBMISSIONS		_18.50	0.00
L200	PRE-	TRIAL PLEADIN	IGS AN	D MOTI	ONS		903.25	0.00
L320	DOC	UMENT PRODU	JCTION				23.75	0.00
L300	DISC	OVERY					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

0285 AA2994

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

TAX ID # 33-0747275

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P.O. Box 5127 Scranton, PA 18505 USA

ESIS Dallas AGL Claims

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

<u>Fees</u>

107.25
107.23
66.00
16.50
n/c
90.75
n/c

0286 AA2995

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					Hours	
	DMC	L210	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE THE ASSOCIATION'S ANSWER TO	0.32	56.87
				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	0.20	56.65
	DMC	L230	A109	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND ATTEND SPECIAL MASTER HEARING (ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH	0.05	8.75
				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		
	DMC	L120	A104	NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
				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	•		
	DMC	L120	A103	CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE: TIME SPLIT WITH OTHER CLAIM NO./FILE	0.05	8.75
	DMC	L120	A104	PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL	0.05	8.75

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03/09/2017

				Hours	
DMC	L120	A103	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) DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: FORTHCOMING RESPONSE REGARDING	0.05	8.75
DMC	L120	A104	DESIGNATING A MEDIATOR PENDING COMMUNICATION WITH CARRIER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	0.05	8.75
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: REQUESTING PARTIES DESIGNATE A MEDIATOR, IN ORDER TO	0.05	8.75
DMC	L120	A103	DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE WITH COPY TO	0.02	4.12
DMC	L120	A103	PLAINTIFF'S COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE A MEDIATOR (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE:	0.02	4.12
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL COUNSEL RE: SPECIAL MASTER'S REQUEST FOR PARTIES DESIGNATE	0.02	4.12
DMC	L120	A103	A MEDIATOR, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO ADDITIONAL E-MAIL FROM DEBBIE HOLLOMAN OF SPECIAL MASTER HALE TO ALL	0.02	4.12
DMC	L120	A104	COUNSEL RE: FORTHCOMING RESPONSE REGARDING DESIGNATING A MEDIATOR PENDING COMMUNICATION WITH CARRIER (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	0.02	4.12
D1:0	1.400	A 40 4	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.02	4.12
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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			REQUEST FOR PARTIES DESIGNATE A MEDIATOR, IN ORDER	Hours	
	DMC L120	A103	TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	0.05	8.25
				0.05	8.25
03/10/2017	DMC L120	A104	REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER I,		
	DMC L120	A104	REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER II,	0.05	8.25
				0.10	16.50
03/14/2017	DMC L120	A103	DRAFT/REVISE INTERNAL MEMORANDUM RE: DISCOVERY STRATEGIES/DISCOVERY PLAN		
	DMC L210	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (BEGIN) CLIENTS' ANSWER TO THE	0.40	66.00
			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,		
			(TIME	0.00	22.00
	DMC L240	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.20	33.00
	DMC L240	A103	IN THEIR COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CLIENTS' MOTION FOR SUMMARY	0.30	49.50

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

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				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		
DMC	1.040	A 4 0 2	NO./FILE PER CARRIER REQUEST)	0.40	66.00
DIVIC	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		

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					Hours	
	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) 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)	0.15 0.05	24.75 8.25
02/20/2017	DMC	1.160	A 1 O 4		0.00	5.25
03/20/2017		L160		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) DRAFT/REVISE RESPONSE TO E-MAIL FROM DEBBIE	0.05	8.25
				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
	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	0.03	0.23
	DMC	L160	A103	REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE:	0.05	8.25
	DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	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

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	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). 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.	0.10 0.45	18.50 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 (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	РСВ	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:		
	DMC L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) SUPPLEMENTAL STATUS REPORT TO CARRIER RE:	0.85	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		
	DMC L120	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
	DMC L120	A103		0.05	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	0.00	40.00
	MD L320	A103	NO./FILE PER CARRIER REQUEST). 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	0.20	19.00
	DMC L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.15	14.25 8.75
				0.00	0.70

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04/06/2017	MD DMC	L320 L250		DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" RE: SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE COMMUNICATION FROM THE COURT RE: ARBITRATION SELECTION LIST PROVIDING RANDOM LIST OF	0.35	33.25
	DMC	L120	A104	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) REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.75
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE WITH ENCLOSURE TO E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.75
				(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		
	MD	L320	A104	CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE NEVADA SECRETARY OF STATE WEBSITE RE: ENTITY INFORMATION FOR LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL	0.05	4.75
	MD	L320	A104	INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE CLARK COUNTY BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC	0.05	4.75
	MD	L320	A104	AND LAURENT HALLIER IN PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE NEVADA STATE CONTRACTORS BOARD WEBSITE RE: ENTITY INFORMATION FOR PANORAMA	0.10	9.50
	MD	L320	A104	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). REVIEW/ANALYZE LAS VEGAS BUSINESS LICENSE SEARCH	0.10	9.50
				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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				Hours	
			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	0.10	0.00
			CONTROLLED INSURANCE PROGRAM INSURANCE MANUAL		
			RE: INSURANCE INFORMATION IN PREPARATION FOR		
			RESPONSES TO CASE MANAGEMENT ORDER SPECIAL		
			INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM		
MD	1.000	A 4 O 4	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	0.25	22.25
DMC	L120	Δ107	CLAIM NO./FILE PER CARRIER REQUEST). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN	0.35	33.25
DIVIC	L120	A101	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	0.40	47.50
DMC	1.120	A 1 O 1	NO./FILE PER CARRIER REQUEST)	0.10	17.50
DIVIC	L120	A 104	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	0.05	0.75
MD	L320	Λ104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CITY OF HENDERSON BUSINESS LICENSE	0.05	8.75
טועו	LJZU	A104	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		

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				TO SDECIAL INTERPOCATORIES 4 TUROUSU 4 /TIME SPLIT	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	,		
				ENTITY INFORMATION FOR PANORAMA TOWERS II, LLC IN		
				PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1-4.	0.10	9.50
				INTERROGATORIES 1-4.	0.10	9.50
04/10/2017	DMC	L120	A103			
				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	Δ103	DRAFT/REVISE (BEGIN) DRAFT OF INSURANCE		
04/11/2017	IVID	L320	A103	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	,		
				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	,		
				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	,		
				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			
				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
					3.33	J J
04/12/2017	MD	L320	A103	DRAFT/REVISE .(BEGIN) M.J. DEAN RESPONSES TO CASE		
				MANAGEMENT ORDER EXHIBIT "B" SPECIAL	0.35	22 DE
				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	0.55	F2 2F
	MD	L320	A103	REQUEST). 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).	0.55 0.65	52.25 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	0.00	70.00
	MD	L320	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.80	76.00
	MD	L320	A103	PER CARRIER REQUEST). 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	0.15	14.25
	MD	L320	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.15	14.25
	MD	L320	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.15	14.25
	MD	L320	A103	NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE)	0.15	14.25

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				Hours	
			PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES	Hours	
			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	Δ104	REVIEW/ANALYZE COMMUNICATION FROM THE	0.03	0.73
DIVIC	LIZU	A10 4	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	0.00	00
			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	2.25	
5140			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	۸103	DRAFT/REVISE E-MAIL TO JEFFREY GANZER (ADJUSTER)	0.05	6.75
DIVIC	LIZU	A103	RE:		
			IXE.		
			(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:		
			,		
			(TIME SPLIT WITH OTHER CLAIM		

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			NO./FILE PER CARRIER REQUEST)	Hours 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	0.05	0.75
	DMC L120) A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC L120) A104	NO./FILE PER CARRIER REQUEST) 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	0.25	43.75
	DMC L120) A104	NO./FILE PER CARRIER REQUEST) 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	0.10	17.50
	DMC L120) A104	CARRIER REQUEST) 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	0.10	17.50
	DMC L120) A104	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	Hours	
	DMC	L120	A104	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	REVIEW/ANALYZE EXHIBIT TO CLIENTS' RESPONSES TO	0.05	8.75
				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		0.50
	MD	L320	A103	CARRIER REQUEST). DRAFT/REVISE SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT RE: RECORDS FOR CITATIONS AND INSPECTIONS AT PANORAMA TOWERS.	0.10	9.50
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	14.25
	DMC	L120	A103	CARRIER REQUEST) 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	0.05	8.75
	DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC	L120	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	26.25

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

04/24/2017

04/25/2017

		Houre	
	PREPARATION FOR SERVICE OF PROCESS ON THE WITNESS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	Hours	
DMC L120 A104	CARRIER REQUEST) 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	0.05	8.75
MD L320 A104	CLAIM NO./FILE PER CARRIER REQUEST) 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.	0.05	8.75
MD L320 A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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.	0.60	57.00
MD L320 A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE AND FINALIZE) EXHIBIT B TO	0.60	57.00
DMC L120 A104	CASE MANAGEMENT RESPONSES RE: SUBCONTRACTORS ENROLLED IN OWNER CONTROLLED INSURANCE PROGRAM. 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	0.45	42.75
MD L320 A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE AND FINALIZE) INSURANCE MATRIX TO BE USED TO CASE MANAGEMENT RESPONSES EXHIBIT C - INSURANCE QUESTIONNAIRE.	0.05	8.75
	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.30	28.50
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

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0.1/0.7/0.0.4.7					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.		
	MD	L320	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE AFFIDAVIT OF SERVICE RE: CUSTODIAN OF RECORDS FOR SOUTHERN NEVADA HEALTH DISTRICT TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY.	0.10	9.50
				(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	0.05	4.75
	JBV	L320	A103	TO OBTAIN ALL REQUESTED DOCUMENTATION. DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO SOUTHERN NEVADA HEALTH DISTRICT, RE: OBTAINING	0.05	4.75
	DMC	L120	A104	PERMITS/RECORDS FOR THE PROJECT SITE. 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	0.05	4.75
	DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC	L250	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
05/09/2017	DMC	L240	A102	EXEMPTION FROM ARBITRATION RESEARCH LEGAL RESEARCH RE: CURRENT LEGAL	0.05	8.75

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			AUTHORITY IN SUPPORT OF CLIENTS' REPLY IN SUPPORT	Hours	
			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			
			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		
DMO	1.040	4400	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		
			I II II O DEI EOTO (TIME OF EIT WITH OTHER OFAIM NO./FIEE		

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					Hours	
	DMC	L240	A103	PER CARRIER REQUEST) 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)	0.30	52.50 166.25
	DMC	L240	A103	DRAFT/RÉVISE (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		
	DMC	L240	A103	NO./FILE PER CARRIER REQUEST) 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 35.00
	DMC	L240	A103		0.80	140.00
05/10/2017	PCB	L240	A103	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		
	DMC	L250	A104	CHAPTER 40. 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)	0.20	35.00 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		

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				AND APPROVE AND EXECUTE SAME IN PREPARATION FOR	Hours	
				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		
	JBV	L320	A104	PURSUANT TO N.R.C.P. 16.1. REVIEW/ANALYZE DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENA DUCES TECUM FROM THE SOUTHERN NEVADA HEALTH DISTRICT, RE: VERIFYING ALL DOCUMENTS ARE	0.05	4.75
	JBV	L320	A103	LEGIBLE FOR ATTORNEY ANALYSIS. DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE:	0.10	9.50
				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		8.75
	DMC	L350	A104	NO./FILE PER CARRIER REQUEST) 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	0.05	6.73
05/47/2047	DMC	1.400	4400	CARRIER REQUEST)	0.05	8.75
05/17/2017	DIMC	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	0.05	0.75
	DMC	L120	A104	CARRIER REQUEST) 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	0.05	8.75

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				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) 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	0.05	8.75
DMC	L120	A103	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) DRAFT/REVISE REPLY TO E-MAIL FROM COLIN HUGHES (PLAINTIFF'S COUNSEL) RE: ADDITIONAL DISCUSSION	0.05	8.75
DMC	L120	Δ104	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) REVIEW/ANALYZE FURTHER E-MAIL FROM COLIN HUGHES	0.05	8.75
DIVIC	L120	A104	(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		
DMC	L120	A103	MASTER HALE REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
DMC	L250	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE COURT ORDER FROM JUDGE SUSAN JOHNSON ON BEHALF OF DISCOVERY COMMISSIONER SUSTAINING BWBO'S OBJECTION TO SANCTIONS AGAINST	0.15	26.25
			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		
DMC	L120	A104	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
JBV	L120	A109	SERVICE ON ALL COUNSEL. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL	0.05	8.75

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				Hours	
	JWS I	L310 A109	APPEAR FOR/ATTEND LITIGATION STRATEGY SESSION,	0.15	14.25
				0.15	26.25
05/18/2017	DMC I	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	0.40	70.00
	DMC I	L120 A103	REQUEST) 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 DSICOVERY 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)	0.40	70.00 96.25
05/19/2017	DMC I	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 I	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 I	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	33.25
05/22/2017	JWS I	L120 A103	DRAFT/REVISE (BEGIN) SUMMARY RE: PROCEDURAL POSTURE AND CASE DEVELOPMENTS ASSIST WITH FURTHER HANDLING.	0.10	17.50

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05/31/2017	PCB L120	A104	REVIEW/ANALYZE CURRENT STATUS OF PLAINTIFF'S	Hours
			CLAIMS (TIME SPLIT WITH OTHER FILE IN SAME CASE AS PER CARRIER DIRECTIVE).	0.20 35.00
			For Current Services Rendered Total Non-billable Hours	33.78 4,945.83 0.70
			Recapitulation	
Timekeep Peter C. E Jeffrey W Jennifer V Darlene M Rachel A. Rochelle Michelle I	Brown . Saab /ela 1. Cartier Bounds A. Harding-Ro	ed	Title Hours Rate PARTNER 0.95 \$178.10 ASSOCIATE 0.45 175.00 PARALEGAL 0.45 95.00 ASSOCIATE 20.83 170.80 PARALEGAL 0.85 106.70 ASSOCIATE 0.45 165.00 PARALEGAL 9.80 95.00	\$169.25 78.75 78.75 42.75 3,559.08 90.75 74.25
			<u>Expenses</u>	
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	0.00
03/02/2017	L100	E109	OTHER CLAIM 558) 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 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	
03/20/2017	L100	E112	COMPLAINT FOR DECLARATORY RELIEF) 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	104.75
03/30/2017	L100	E102	COMPLAINT FOR DECLARATORY RELIEF) OUTSIDE PRINTING (CLARK COUNTY'S RECORDERS OFFICE	52.37
03/30/2017	L100		DOCUMENTS) (SPLIT BETWEEN 1287.551/558 AND 1246.005) OTHER PROFESSIONALS (2407) PAUL A. ACKER (DOCUMENTS	5.52

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			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	
03/31/2017	L100	E101	FROM CLARK COUNTY RECORDER'S OFFICE) REPRODUCTION COSTS FOR MARCH 2017 (800 PAGES AT	2.07
04/04/2047	1.400	E440	.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	
04/04/2017	L100	E112	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) 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	1.75
			MOTION FOR PARTIAL SUMMARY JUDGMENT ON THEIR THIRD CLAIM FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY	
04/30/2017	L100	E101	RELIEF) REPRODUCTION COSTS FOR APRIL 2017 (209 PAGES AT	1.75
05/01/2017	L100	F113	.08/PAGE) SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES	8.36
00/01/2017	2100	LIIO	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	SERVICES RENDERED ON 4/24/17/(SPEIT WITH 1267:351) SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010107 SUBPOENA DUCES TECUM & NOTICE - SOUTHERN NEVADA HEALTH DISTRICT, LAS VEGAS /	30.93
05/10/2017	L100	E112	SERVICES RENDERED ON 4/24/17)(SPLIT WITH 1287.558) 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 JUDGEMENT ON THEIR THIRD CLAIM	15.47
05/16/2017	L100	E112	FOR RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) 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	1.75

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05/31/2 05/31/2		L100 L100		PANORAMA TOVASSOCIATION'S DEFENDANTS L. PANORAMA TOVA CONSTRUCTION	WER CONDO COUNTER O AURENT HAI WERS I MEZ N, INC.'S MO LAIM FOR RE RELIEF) N COSTS FO N COSTS FO	MINIUM UNIT C CLAIM AND PLA LLIER'S PANOR Z, LLC'S AND M FION FOR SUMM ELIEF IN THEIR (R MAY 2017 (9 F	INTIFFS/COUNTE AMA TOWERS I, J. DEAN MARY JUDGMEN ^T COMPLAINT FOR PAGES AT .08/PA	ER LLC'S. FON	$ \begin{array}{r} 1.75 \\ 0.72 \\ \hline 47.76 \\ \hline 321.74 \\ 5,267.57 \\ $20,795.71 \end{array} $
					<u>Paym</u>	<u>ents</u>			
04/18/2	017			PAYMENT RECE / STMT #7)	EIVED - THAN	IK YOU (ESIS -	CHECK NO FA786	616734	-9,050.86
04/20/2	017				EIVED - THAN	IK YOU (ESIS - (CHECK NO FA786	616736	-5,726.89
04/20/2	017				EIVED - THAN	IK YOU (ESIS - (CHECK NO FA786	616743	-7,146.72
				Total Payments					-21,924.47
				Balance Due					<u>\$4,138.81</u>
	3 INSURANCE allas AGL Clai				Split Billing	Summary Fees 4,523.42 4,523.33 9,046.75	Expenses 171.82 171.79 343.61	Advances 0.00 0.00 0.00	Total 4,695.24 4,695.12 9,390.36
				7	Гask Code Re	ecapitulation			
L100 L110 L120 L160 L190 L100	L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION 0.00 L110 FACT INVESTIGATION/DEVELOPMENT 81.25 L120 ANALYSIS/STRATEGY 1325.84 L160 SETTLEMENT/NON-BINDING ADR 66.00 L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION 43.75						Expenses 321.74 0.00 0.00 0.00 0.00 0.00 321.74		
L210 L230 L240 L250 L200	PLEADINGS COURT MAN DISPOSITIVE OTHER WRIT PRE-TRIAL F	E MOTIC TTEN M PLEADIN	ONS OTIONS IGS AN	S AND SUBMISSIC	DNS			117.50 311.74 1935.00 60.75 2,424.99	0.00 0.00 0.00 0.00 0.00

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		<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

AA3021 0312

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

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

Fees

				<u>rees</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		
	DMC	L160	۸103	CARRIER REQUEST) DRAFT/REVISE E-MAIL TO ALL SUBCONTRACTOR COUNSEL	0.05	8.25
	DIVIC	L100	A103	RE:		
				(TIME SPLIT WITH OTHER		
	DMC	L160	A103	CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO MARTIN LITTLE (COUNSEL FOR	0.05	8.25
				CLIENT MJ DEAN) RE:		
				(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		
	5140			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	DCD	1 240	A 102	,	0.00	0.20
09/03/2016	РСБ	L210	A 103	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:		

0313 AA3022

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				<u></u>	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	0.05	8.25
	DMC	L120	A104	REQUEST) REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.03	0.23
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: PRELIMINARY	0.05	8.25
				(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		
	DMC	L160	A108	REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CARRIER) RE: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.05	8.25
	DMC	L160	A104	CARRIER REQUEST) 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	0.15	24.75
	DMC	L160	A103	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.25
	DMC	L160	A103	CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE:	0.05	8.25
				0314	AA3023	

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					Hours	Amount
	DMC	L160	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE FORM CORRESPONDENCE TO ALL SUBCONTRACTORS BWBO PLACED ON NOTICE OF THE ASSOCIATION'S CHAPTER 40 CLAIM REGARDING THE	0.05	8.25
				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	0.05	0.05
	DMC	L160	A108	PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH ASHLEY ALLARD (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.25
	DMC	L160	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (BEGIN) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM	0.10	16.50
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM	0.10	16.50
	DMC	L160	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: (AUTHORIZED BY	0.15	24.75
	DMC	L160	A103	CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:	0.15	24.75
	DMC	L160	A103	AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:	0.65	107.25

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

09/14/2016

			(AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	Hours 0.30	Amount 49.50
DMC	L160	A103	DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:		
DMC	L160	A103	(AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:	0.55	90.75
DMC	L160	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:	0.15	24.75
DMC	L160	A103	(AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE:	0.70	115.50
DMC	L160	A103	(AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF FOR UPCOMING CHAPTER 40 MEDIATION RE: (AUTHORIZED BY CARRIER 9/12/16). (TIME SPLIT WITH OTHER	0.20	33.00
DMC	L160	A104	CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS FORTHCOMING DETERMINATION AS TO WHETHER CULLIGAN WILL BE PARTICIPATING IN THE	0.05	8.25
DMC	L160	A104	UPCOMING CHAPTER 40 MEDIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM EDEN WATERS OF MKA (CLIENT'S ARCHITECTURAL EXPERT) RE:	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.10	16.50
RAB	L320	A104	REVIEW/ANALYZE CERTIFICATE OF OCCUPANCIES, RE: PERMIT NUMBERS AND ADDRESS OF 2 BUILDING IN PREPARATION FOR CORRESPONDING WITH THE CLARK	0.10	10.50
RAB	L320	A108	COUNTY BUILDING DEPARTMENT. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: CERTIFICATES OF	0.10	9.50
			0316	AA3025	

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				COMPLETION AND FINAL INSPECTION REPORTS. (TIME SPLIT	Hours	Amount
	DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	9.50
	DMC	L120	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: (TIME SPLIT WITH OTHER	0.15	24.75
				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: (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
	RAB	L130	A108	REQUEST) COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: (TIME	0.05	4.75
	RAB	L130	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE:	0.05	4.75
	DMC	L150	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE PHASE I LITIGATION BUDGET PURSUANT TO	0.05	4.75
	РСВ	L120	A104	REQUEST BY CARRIER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION	0.20	33.00
				(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		
	RAB	L140	A103	CARRIER REQUEST) 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	0.10	9.50
				0317	AA302	6

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Account No: 1287-5511M Statement No:

	DAR	L140	A104	CARRIER REQUEST) REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S	Hours	Amount 4.75
	KAD	L140	A104	EXPERT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER		
	RAB	L140	A104	CARRIER REQUEST) REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT MADSEN, KNEPPERS & ASSOCIATES, INC., RE	0.05	4.75
	RAB	L140	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT	0.05	4.75
				(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:		
	РСВ	L250	A103	(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558). DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF	0.10	18.50
				RE:		
	РСВ	L160	A101	(TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER II" - 1287.558). PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION	0.40	74.00
				RE:		
				(TIME SPLIT WITH		
	DMC	L160	A104	OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558) REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: STRATEGIES FOR UPCOMING CHAPTER 40	0.50	92.50
	DMC	L160	A104	MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE:	0.05	8.25
				(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		
				0318	AA3027	

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					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		
	DMC	L160	۸ ۱	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CORRESPONDENCE TO BRUCE EDWARDS	0.15	24.75
	DIVIC	L100	A 103	(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		
	DMC	L160	A 104	REQUEST)	0.15	24.75
	DIVIC	L100	A 104	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	0.05	0.05
	DMC	L160	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON	0.05	8.25
				(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			
				(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
				SPEIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.03	0.23
09/21/2016	PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S		
				MEDIATION RE:		
				(TIME SPLIT WITH OTHER FILE IN SAME CASE -		
				"PANORAMA TOWER II" - 1287.558) (NO TRAVEL TIME		
				INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PACE AT		
	DMC	L160	A103	BWB&O'S OFFICE). DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL	0.60	111.00
	20			COUNSEL FOR CLIENT MJ DEAN) RE:		
				OTHER CLAIM NO./FILE PER (TIME SPLIT WITH		
				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:		
				ATTENDANCE BY DMC AND PCB AUTHORIZED BY		
				0319	AA3028	
				0017	$\Delta \Delta J U L 0$	

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	Hours	Amount
CARRIER) (ENTRY DOES NO WITH OTHER CLAIM NO./FILI DMC L160 A104 REVIEW/ANALYZE E-MAIL W PERSON OF JAMS ON BEHA	ITH ENCLOSURE FROM CAIRO	82.50
(MEDIATOR) RE: REVISED S'	TRATEGIES RELATING TO DIATION. (TIME SPLIT WITH OTHER REQUEST) 0.05	8.25
(TIME SPLIT WITH OTHER CLAIM N DMC L160 A104 REVIEW/ANALYZE E-MAIL W	IO./FILE PER CARRIER REQUEST) 0.05 ITH ENCLOSURE FROM ASHLEY ARCHITECTURAL EXPERT) RE:	8.25
	CARRIER REQUEST) 0.15 (PERT REPORT BY CHRIS ALLEN AL EXPERT) IN PRIOR LITIGATION	24.75
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIE DMC L160 A103 DRAFT/REVISE E-MAIL TO S RE:		24.75
(TIME SPLIT WITCH CARRIER REQUEST)	TH OTHER CLAIM NO./FILE PER 0.05	8.25
09/22/2016 PCB L120 A101 PLAN AND PREPARE (CONT MEDIATION RE:	(TIME SPLIT WITH OTHER	
FILE IN SAME CASE - "PANO RAB L320 A104 REVIEW/ANALYZE DOCUME MEDIATION, RE:		74.00
(TIME SE	PLIT WITH OTHER CLAIM NO./FILE	
PER CARRIER REQUEST) RAB L320 A103 DRAFT/REVISE EMAIL TO SH	0.10	9.50
	0320 AA302	.9

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				SOLUTIONS, RE:	Hours	Amount
				(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:		
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE:	0.05	8.25
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO SHANE GODFREY (AUDIO VISUAL) RE:	0.05	8.25
09/24/2016	DMC	L120	A109	(34 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) APPEAR FOR/ATTEND WITH SHANE GODFREY (AUDIO VISUAL)	0.05	8.25
				AND MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE:		
	DMC	L120	A103	(ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	1.05	173.25
				0321	AA3030)

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

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

0322

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			II").	Hours 0.40	Amount 74.00
PCB	L160	A109	APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II")(NO	2.00	370.00
PCB	L160	A109	TRAVEL TIME INCLUDED IN THIS ENTRY). APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE -	2.00	370.00
DMC	L160	A109	1287.558 - "PANORAMA TOWER II"). TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME	0.50	n/c
DMC	L160	A109	SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) APPEAR FOR/ATTEND CHAPTER 40 MEDIATION (ATTENDANCE	0.30	n/c
DMC	L160	Δ100	BY DMC AND PCB APPROVED BY CARRIER) (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT	2.00	330.00
			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:		
			(TIME		
DMC	L120	A103	SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY	0.10	16.50
			(AUDIO VISUAL) RE:		
			(TIME SPLIT WITH OTHER CLAIM NO/FILE		
DMC	L120	A104	PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE:	0.05	8.25
			(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:		
			(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S		
DMC	L120	A104	REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE:	0.10	16.50
			(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:		
			(TIME SPLIT WITH		
			0323	Λ Λ 2022	

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	DMC L120	A103	OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND	Hours 0.05	Amount 8.25
	56 2.120	71100	RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE:		
	DMC L210	A103	(TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) 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	0.05	8.25
			REQUEST). (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)	0.50	82.50
09/27/2016	DMC L120	A104	REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:		
	DMC L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:	0.05	8.25
	DMC L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:	0.05	8.25
	DMC L210	A103	(ADJUSTER FOR PRIOR LITIGATION) (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE TERMS OF THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION	0.05	8.25
	DMC L210	A103	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) DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE NEW REQUIREMENTS UNDER AB 125 REGARDING EVIDENCE OF PHYSICAL DAMAGE TO PROPERTY AND	0.10	16.50
	DMC L210	A103	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) DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE CC&RS, INCLUDING UNIT BOUNDARIES, DEFINITION OF COMMON ELEMENTS AND UNIT OWNER	0.40	66.00
	DMC L210	A103	MAINTENANCE RESPONSIBILITIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE:	0.40	66.00
			0324	AA3033	

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				Hours	Amount
			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. (THE PURSUANT TO CARRIERIS REQUEST)	0.20	22.00
DMC	L210	A103	CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 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	0.20	33.00
DMC	L210	A103	NO./FILE PURSUANT TO CARRIER'S REQUEST) 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	0.10	16.50
DMC	L210	A103	EXACT LOCATION OF EACH DEFECT DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A FIFTH CLAIM FOR RELIEF FOR BREACH OF CONTRACT FOR THE ASSOCIATION'S BREACH OF THE SETTLEMENT	0.10	16.50
DMC	L210	A103	AGREEMENT IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 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	0.30	49.50
DMC	L210	A103	RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) 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	0.50	82.50
DMC	L120	A104	NEWLY ALLEGED CLAIMS THAT WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE:	0.50	82.50
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE:	0.05	8.25
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)	0.05	8.25
			0325	AA3034	

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				Hours	Amount
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		
DMC	L120	A104	REQUEST)(NOTICE/REQUEST APPROVED BY CARRIER) REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE:	0.90	148.50
DMC	L250	A104	TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE INITIAL APPEARANCE FEE DISCLOSURE FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS'	0.05	8.25
DMC	L250	A104	COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE CLIENTS' DEMAND FOR JURY TRIAL FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE	0.05	8.25
DMC	L250	A103	ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE:	0.05	8.25
DMC	L250	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE DETAILED RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE:	0.20	33.00
RAB	L320	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40 MEDIATION, RE: POWER POINT PRESENTATION INFORMATION IN PREPARATION SENDING TO PARTIES IN THE CASE AS PER	0.40	66.00
PCB	L210	A103	REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF ACTION RE: ADDITIONAL ALLEGATIONS WITH REGARD TO THE SETTLEMENT AGREEMENT FROM THE ORIGINAL CASE (TIME SPLIT WITH OTHER	0.15	14.25
DMC	L120	A103	SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II"). DRAFT/REVISE FOLLOW UP E-MAIL TO NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE:	0.10	18.50
			(TIME		
			0326	Δ Δ 3 0 3 5	

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					Hours	Amount
				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		
	DMC	L120	A104	REPORTS. (TIME IS SPLIT WITH THE OTHER FILE 1287.558) REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE:	0.10	9.50
	5140			(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:	51.15	. 5.55
				(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:		
	DMC	L160	A107	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	16.50
	DMC	L120	A104	CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE:	0.10	16.50
	DMC	I 120	Δ103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM AINE MADDEN OF	0.05	8.25
	DIVIO	LIZU	A103	0327	AA3036	

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				ENDURANCE (EXCESS CARRIER) RE:	Hours	Amount
				(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		
	DMC	L120	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS (CARRIER) RE:	0.05	8.25
	DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRYDON OF ESIS (CARRIER) RE:	0.05	8.25
				(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	0.00	0.20
	DMC	L160	A104	SETTLEMENT DISCUSSIONS WITH THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING SETTLEMENT DISCUSSIONS THAT TOOK PLACE AT THE RECENT	0.05	8.25
				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:	AA3037	

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					Hours	Amount
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.25
				(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		
	RAB	L340	A104	NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE EMAIL TO PLAINTIFF'S COUNSEL FRANCIS LYNCH, RE: POWER POINT PRESENTATION DOCUMENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.10	9.50
				REQUEST)	0.10	9.50
10/26/2016	DMC	L120	A104	REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE:		
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER (CARRIER) RE:	0.05	8.25
				(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:		
				(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.		
	RAB	L320	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE EMAIL TO DEFENDANTS OLDCASTLE BUILDING	0.10	9.50
				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	РСВ	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		
				0329	AA3038	

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				TENDER OF DEFENSE.			Hours	Amount
				(TIME SPLIT WITH OTHER FILE IN SAME 1287.551)	E CASE - PANORAM	A II -	0.10	18.50
11/23/2016	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUFOR PLAINTIFF RE: CONTINUED DISCUTIMING FOR HIS CLIENT'S RESPONSE TO DEFENSE, THE TIMING FOR HIS CLIENT DEC RELIEF ACTION TO THE HOA'S CAITIMING OF HIS CLIENT'S FILING OF A ROUTE (TIME SPLIT WITH OTHER FILE IN SAME	SSION ABOUT THE FO THE TENDER OF F'S TENDER OF THE RRIER, AND THE ESPONSIVE PLEAD	ING		
	PCB	L190	A103	-1287.551). DRAFT/REVISE EMAIL TO COUNSEL FO CONFIRMATION OF AGREEMENTS REA MORNING'S PHONE CONVERSATION. (TOTHER FILE IN SAME CASE - PANORAMA II - 1287.551).	CHED DURING THIS	;	0.20	37.00 18.50
				For Current Services Rendered Total Non-billable Hours			29.00 1.20	4,894.50
				Recapitulation				
Timekeeper Peter C. Brown Darlene M. Cartier Rachel A. Bounds				<u>Title</u> PARTNER ASSOCIATE PARALEGAL	<u>Hours</u> 10.90 16.55 1.55	<u>Rate</u> \$185.00 165.00 95.00	\$2,01 2,73	
				<u>Expenses</u>				
09/26/2016		L100	E109	LOCAL TRAVEL (8799) DARLENE M. CAF \$.54/MILE FOR MEDIATION) SPLIT WITH		T		7.88
09/29/2016 09/30/2016		L100 L100		WIZ-NET (DEMAND FOR JURY TRIAL) REPRODUCTION COSTS FOR SEPTEME		FS		1.75
10/11/2016		L100		0.08/PAGE) WIZ-NET (SUMMONS PANORAMA TOWE	•			43.60
		L100		OWNERS' ASSOCIATION) REPRODUCTION COSTS FOR OCTOBER				1.75
10/31/2016 11/03/2016		L100		OTHER PROFESSIONALS (98118) HOLO SERVICES) (INVOICE	DISCOVERY (DEPO	SITORY		0.48
11/30/2016		L100	E101	NO. 1457) (SPLIT BETWEEN 1287.551 AI PREPARATION) REPRODUCTION COSTS FOR NOVEMBI 0.08/PAGE)	, ,			693.75
				Total Expenses				749.81
				Total Current Work				5,644.31
				Previous Balance				\$11,381.32
				Balance Due				\$17,025.63

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			Aged Due Amo	ounts			
	<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 Sum	nmary			
						<u>Fees</u>	<u>Expenses</u>
L100	CASE ASSESSMENT, DEVELO	PMENT AND AD	MINISTRATION			0.00	749.81
L120	ANALYSIS/STRATEGY					1472.75	0.00
L130	EXPERTS/CONSULTANTS					14.25	0.00
L140	DOCUMENT/FILE MANAGEME	NT				28.50	0.00
L150	BUDGETING					33.00	0.00
L160	SETTLEMENT/NON-BINDING A	NDR				2253.25	0.00
L190	OTHER CASE ASSESSMENT, I	DEVELOPMENT	& ADMINISTRAT	TION		64.75	0.00
L100	CASE ASSESSMENT, DEVELO	PMENT AND AD	MINISTRATION			3,866.50	749.81
L210	PLEADINGS					585.50	0.00
L250	OTHER WRITTEN MOTIONS A	ND SUBMISSION	NS			338.00	0.00
L200	PRE-TRIAL PLEADINGS AND N	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

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

TAX ID # 33-0747275

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Statement No: 1267-3361V

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

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

<u>Fees</u>

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 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	
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. 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. 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	
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 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	9.50
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	4.75
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)	
(TIME SPLIT WITH 1287.551) 1.30 227	7.50
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 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	0.00
PCB L240 A101 PLAN AND PREPARE (BEGIN) FOR TOMORROW'S HEARING ON	0.00
MOTION FOR SUMMARY JUDGMENT AND MOTION FOR 0337	

0332 AA3041

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					Hours	
	РСВ	L240	A101	PARTIAL SUMMARY JUDGMENT RE: (TIME SPLIT WITH OTHER FILE - BWB&O File #1287.558 - THAT DEALS WITH TOWER II). 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,	1.10	192.50
	JWS	L230	A101	(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - DEALING WITH TOWER II). PLAN AND PREPARE FOR (BEGIN) HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT. REVIEW, ANALYZE AND OUTLINE MOVING PAPERS WITH EXHIBITS (APPROXIMATELY 200 PAGES).	0.40	70.00
	JWS	L230	A104	(TIME ALREADY SPLIT WITH 1287.558) REVIEW/ANALYZE (BEGIN) LEGAL RESEARCH, CASES CITED IN SUPPORT/AGAINST MOTION FOR SUMMARY JUDGMENT,	0.65	113.75
	JWS	L230	A101	GENERAL HOLDINGS/APPLICABILITY, AND FACTUAL SCENARIOS TO ASSIST WITH FORMULATION OF ORAL ARGUMENTS. (TIME ALREADY SPLIT WITH 1287.558) PLAN AND PREPARE FOR (CONTINUE) ORAL ARGUMENTS ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT, FORMULATION OF ADDITIONAL ARGUMENTS IN SUPPORT OF RELIEF SOUGHT	0.40	70.00
06/20/2017	JWS	L230	A101	(TIME ALREADY SPLIT WITH 1287.558) PLAN AND PREPARE FOR (CONTINUE) HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT, MORE SPECIFICALLY, STATUTORY ARCUMENTS DE-	0.45	78.75
	JWS	L230	A109	STATUTORY ARGUMENTS RE: TIME SPLIT WITH 1287.551 APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON	0.30	52.50
	JWS	L230	A103	CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL TIME IN ENTRY. TIME SPLIT WITH 1287.551. DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE:	1.30	227.50
	JWS	L230	A103	TIME SPLIT WITH 1287.551 DRAFT/REVISE CORRESPONDENCE TO ADJUSTER, RE: CASE ACTIVITY UPDATE, HEARING ON MOTION FOR SUMMARY JUDGMENT AND FURTHER HANDLING. TIME SPLIT WITH	0.20	35.00
	JWS	L230	A101	1287.551 PLAN AND PREPARE FOR (CONTINUE) HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT, MORE SPECIFICALLY, STATUTORY ARGUMENTS RE: DEFINITION OF UNIT, NOTICE	0.10	17.50
	JWS	L230	A109	REQUIREMENTS, AND RIGHT TO REPAIR AS RAISED IN THE ASSOCIATION'S OPPOSITION. (TIME SPLIT WITH 1287.558) APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON	0.15	26.25
				0333	AA3042	

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				CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL	Hours	
	JWS	L230	A103	TIME IN ENTRY. (TIME ALREADY SPLIT WITH 1287.558) DRAFT/REVISE SUMMARY RE: ORAL ARGUMENTS/COURT'S	0.65	113.75
				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	0.00	0.70
	РСВ	L240	A109	FILE IN SAME CASE - 1287.558 - TOWER II). APPEAR FOR/ATTEND HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY	1.70	297.50
				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	РСВ	L120	A103	DRAFT/REVISE EMAILS TO CARRIERS RE:		
	JWS	L120	A103	(TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). DRAFT/REVISE UPDATED SUMMARY TO CARRIER, RE:	0.20	35.00
					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	IWS	L320	Δ10/	REVIEW/ANALYZE CORRESPONDENCE FROM OWNER OF	0.03	0.75
00/20/2011	0110	L020	71104	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	0.00	05.00
				OTHER FILE IN SAME CASE - 1287.558 - TOWER II).	0.20	35.00
				0334	AA3043	

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					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		
07/16/2017	JWS	L210	A104	COUNSEL'S AGREEMENT TO THE PROPOSED EXTENSION. REVIEW/ANALYZE CORRESPONDENCE/NOTES, AND PROCEDURAL HISTORY IN PREPARATION OF OPPOSITION TO THE ASSOCIATION'S MOTION TO ENLARGE TIME TO SERVE	0.10	17.50
	JWS	L210	A104	COUNTER-DEFENDANTS. TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER. 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.	0.40	70.00
	JWS	L210	A103	TIME SPLIT TO BE SPLIT WITH OTHER TOWER CASE AT REQUEST OF ADJUSTER. DRAFT/REVISE (BEGIN) AFFIDAVIT OF PETER BROW IN	0.35	61.25
				0335	AA3044	

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				Hours	
	JWS L210	MOTION FOR EI A103 DRAFT/REVISE MOTION TO ENI COUNTER-DEFI	CLIENT'S OPPOSITION TO THE ASSOCIATION'S NLARGEMENT OF TIME. (BEGIN) OPPOSITION TO THE ASSOCIATION'S LARGE TIME TO SERVE ENDANTS, RE: PROCEDURAL HISTORY, FACTS, ARDS AND CASE LAW, E.G., NRCP(4) AND	0.05	8.75
			UMENTS AND PRAYER FOR RELIEF. (TIME 37.558 AT REQUEST OF ADJUSTER.)	0.85	148.75
07/17/2017	JWS L210	AMEND TO ADD	(SUPPLEMENTED) OPPOSITION TO MOTION TO DRESS AMENDMENTS TO PLEADINGS, AND RVATION TO OBJECT TO SAME AND ALSO TO ALIDITY OF COUNTER-CLAIM.	0.10	17.50
	PCB L250	A103 DRAFT/REVISE ENLARGE TIME ARGUMENTS D COUNTER-CLAI TO SERVE WITH ARGUMENTS AS ADDITIONAL TIME ARGUMENTS AS SHOULD THE C	(FINALIZE) OPPOSITION TO MOTION TO ETO SERVE COUNTER-CLAIM RE: ADDITIONAL EALING WITH THE INVALIDITY OF THE IM AS TO THE PARTIES THE HOA IS SEEKING HOTHE LACK OF JUSTIFICATION FOR THE ME BEING REQUESTED, AND ADDITIONAL S TO THE PREJUDICE THAT WILL OCCURED OUR GRANT THE HOA'S REQUEST (TIME HER FILE IN SAME CASE - 1287.558 - TOWER II).	0.10	70.00
07/26/2017	PCB L210	FOR ONE OF TH THE CURRENT MOST RECENT HER CLIENT NE THIS TIME TO T	E (OTHER OUTSIDE COUNSEL) WITH COUNSEL HE SUBCONTRACTORS RE: DISCUSSION OF STATUS OF THE COURT'S RULING ON THE ROUND OF MOTION PRACTICE, AND WHETHER EEDS TO FILE A RESPONSIVE PLEADING AT THE HOA'S PLEADING (TIME SPLIT WITH OTHER CASE - 1287.558 - TOWER II).	0.05	8.75
07/27/2017	JWS L120	WESTERN NATI	E (OTHER EXTERNAL) ADJUSTER WITH IONAL X 2 ON BEHALF OF PLUMBING/SEWER FOR RE: CASE ACTIVITY, SPLIT WITH TOWER		
	JWS L210	TWO CASE PER A104 REVIEW/ANALY OPPOSITION TO		0.15	26.25
		ADJUSTER.	0, 2, , , , , , , , , , , , , , , , , ,	0.10	17.50
07/31/2017	JWS L230	PREPRATION F TO SERVE REM	PARE FOR, ASSIST HANDLING PARTNER WITH OR HEARING ON THE ASSOCIATIONS MOTION IAINING PARTIES, INCLUDED IFCATION OF MATERIAL AND EXHIBITS NEEDED GUMENTS.	0.15	26.25
08/01/2017	PCB L250	REQUEST TO E	ZE PLEADINGS RELATED TO THE HOA'S EXTEND THE TIME TO SERVE THE IM AND OUTLINE ORAL ARGUMENTS TO BE HEARING, (TIME SPLIT WITH OTHER		

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					Harris	
	РСВ	L250	A109	FILE IN SAME CASE - 1297.558 - TOWER II). 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;	Hours 0.40	70.00
	РСВ	L250	A103	NO TRAVEL TIME INCLUDED IN THIS ENTRY). DRAFT/REVISE PROPOSED ORDER DENYING THE HOA'S MOTION TO ENLARGE TIME (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).	0.70	122.50 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		
	JWS	L230	A103	WITH TOWER TWO FILE PER ADJUSTER. DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: CASE STATUS, PENDING RULING FROM JUDGE, AND	0.10	17.50
	JWS	L230	A104	REQUEST TO CONTINUE HEARING. REVIEW/ANALYZE CORRESPONDENCE/RESPONSE FROM SPECIAL MASTER HALE RE: STATUS UPDATE/REQUEST TO	0.10	17.50
				CONTINUE HEARING.	0.05	8.75
08/10/2017		L230		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	0.40	47.50
	JWS	L230	A104	HEARING BASED ON PROCEDURAL POSTURE OF CASE. REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: APPROVAL OF REQUEST TO CONTINUE HEARING BASED ON PROCEDURAL POSTURE OF CASE.	0.10	17.50 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. For Current Services Rendered	$\frac{0.20}{17.70}$	35.00 3,081.50
					17.70	3,061.50
Timekee	per			Recapitulation <u>Title</u> <u>Hours</u> <u>Rate</u>		Γotal
Peter C. Jeffrey V Jennifer	Brown V. Saab			PARTNER 6.90 \$175.00 ASSOCIATE 10.60 175.00 PARALEGAL 0.20 95.00	\$1,20 1,85	
				<u>Expenses</u>		
06/01/2017		L100	E112	ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 FILING FEE: ADR COMMISSIONER OFFICE /		00.00
06/01/2017		L100	E112	SERVICES PROVIDED ON 5/10/17) ATTORNEY SERVICE (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO ISSUE A CHECK - SOUTHERN NEVADA		26.69
06/01/2017		L100	E112	HEALTH DISTRICT / SERVICESPROVIDED ON 5/10/17) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT /		22.34

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			SERVICES PROVIDED ON 5/11/17)	2.87
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)	2.87
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	2.07
			COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND	
00/00/00/17	1.400	- 400	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	7.00
			WITH 1287.558)	3.75
06/30/2017	L100		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		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	4.50
08/01/2017	L100	F112	ONE OTHER FILE) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE	4.50
00/01/2017	L100	L112	#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	0.05
08/03/2017	L100	E112	ONE OTHER FILE) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE	2.25
00/03/2017	L100	LIIZ	#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'	
08/07/2017	L100	E112	ASSOCIATION'S MOTION TO ENLARGE TIME FOR SERVICE) ODYSSEY (ORDER DENYING DEFENDANT PANORAMA TOWERS	1.75
00/07/2017	L100	E112	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	
		<u>0-30</u>	<u>31-60</u> <u>61-90</u> <u>91-120</u> <u>121-180</u>	<u> 181+</u>
	3,19	5.60	0.00 0.00 4,138.81 0.00	0.00

ESIS Dallas AGL Claims

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	Spl EE - Panorama Tower I aims (2) - Panorama Tower II	it Billing Summary Fees 2,600.25 2,224.00 4,824.25	Expenses 102.16 102.10 204.26	Advances 0.00 0.00 0.00	Total 2,702.41 2,326.10 5,028.51
	lask	Code Recapitulation			
				<u>Fees</u>	<u>Expenses</u>
	ESSMENT, DEVELOPMENT AND ADMIN	ISTRATION		0.00	114.10
	STIGATION/DEVELOPMENT			17.50	0.00
	STRATEGY	2. 41. U.C.T.D. 4. T. (2. 1.		87.50	0.00
L190 OTHER CA	SE ASSESSMENT, DEVELOPMENT & AD	DMINISTRATION		26.25	0.00
L100 CASE ASS	ESSMENT, DEVELOPMENT AND ADMIN	ISTRATION		131.25	114.10
1040 DI EADING				507.50	0.00
L210 PLEADING				507.50	0.00
	ANDATED CONFERENCES VF MOTIONS			1356.25 787.50	0.00 0.00
	RITTEN MOTIONS AND SUBMISSIONS			271.25	0.00
L200 PRE-TRIAI	PLEADINGS AND MOTIONS			2,922.50	0.00
L320 DOCUMEN	IT PRODUCTION			8.75	0.00
	RY MOTIONS			19.00	0.00
L300 DISCOVER	(Υ			27.75	0.00

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

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<u>Fees</u>

03/02/2017	DMC	L230	A101	PLAN AND PREPARE FOR FIRST SPECIAL MASTER HEARING	Hours	
				RE:		
				(TIME SPLIT WITH OTHER CLAIM NO./FILE PER		
	DMC	L210	A104	CARRIER REQUEST) REVIEW/ANALYZE THE ASSOCIATION'S ANSWER TO CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AND THE ASSOCIATION'S COUNTERCLAIM AGAINST CLIENTS IN	0.33	56.88
				PREPARATION FOR STATUS REPORT TO CARRIER AND DRAFTING CLIENTS' ANSWER TO COUNTERCLAIM (34 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER		
	DMC	L120	A103	REQUEST) 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	0.20	35.00
	DMC	L230	A109	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) TRAVEL TO JAMS TO ATTEND SPECIAL MASTER HEARING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER	0.05	8.75
	DMC	L230	A109	REQUEST) APPEAR FOR/ATTEND ATTEND SPECIAL MASTER HEARING	0.40	n/c
	DMC	L230	A109	(ENTRY DOES NOT INCLUDE TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT SPECIAL MASTER HEARING (TIME SPLIT WITH OTHER CLAIM	0.28	48.13
				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		

0340 AA3049

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				Hours	
			IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.03	4.38
03/08/2017	DMC L1		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 L1	120 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	0.03	4.13
	DMC L1	120 A103	CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE:	0.03	4.13
	DMC L1	120 A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.03	4.13
	DMC L1	120 A103	OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.03	4.13
	DMC L1	120 A104	CARRIER REQUEST) REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	0.03	4.13
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.03	4.13
03/09/2017	DMC L1	160 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		
	DMC L1	120 A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE TO E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:	0.05 0.05	8.25 8.25
03/10/2017	DMC L1	120 A104	REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER I,	0.00	3.20
	DMC L1	120 A104	REVIEW/ANALYZE SUMMARY OF CLARK COUNTY ASSESSORS RECORDINGS RELATING TO TOWER II,	0.05	8.25

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				Hours	
				0.10	16.50
03/14/2017	DMC L120	A103	DRAFT/REVISE INTERNAL MEMORANDUM RE: DISCOVERY STRATEGIES/DISCOVERY PLAN		
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.40	66.00
	DMC L210	A103	CARRIER REQUEST) DRAFT/REVISE (BEGIN) CLIENTS' ANSWER TO THE ASSOCIATION'S COUNTERCLAIM RE: OPENING (TIME SPLIT	0.40	66.00
			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,		
			(TIME SPLIT WITH OTHER CLAIM	0.00	20.00
	DMC L240	A104	NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE THE ASSOCIATION'S CIVIL ENGINEER'S EXPERT REPORT RE: ALLEGED DEFECTS AND DAMAGES TO	0.20	33.00
			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	•	0.00	43.00
			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		
	DMC L240	A103	NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY	0.95	156.75
			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	0.30	49.50
	DMC L240	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CLIENTS' MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND	0.30	+3.00
			CLIENTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON		

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				Hours	
			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		
DMC	L240	A103	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: (CONTINUE) PROCEDURAL HISTORY - (B) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, INCLUDING CAUSES OF ACTION (TIME SPLIT WITH	0.65	107.25
DMC	L240	A103	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: 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	0.30	49.50
DMC	L240	A103	REQUEST)	0.90	148.50
DMC	L240	A103	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): INTRODUCTION TO LEGAL ARGUMENT (TIME SPLIT WITH	0.20	33.00
DMC	L240	A103	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): (1) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL WINDOW DEFECT ALLEGATION (TIME SPLIT	0.55	90.75
DMC	L240	A103	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): (2) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S RESIDENTIAL FIREBLOCKING DEFECT ALLEGATION (TIME	0.40	66.00

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03/20/2017

DMC	L240	A103	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	Hours 0.20	33.00
DMC	L240	A103	MECHANICAL PIPING DEFECT ALLEGATION (TIME 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): (4) ANALYSIS AND ARGUMENT RELATING TO THE ASSOCIATION'S	0.35	57.75
DMC	L240	A103	SEWER LINE DEFECT ALLEGATION (TIME 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 - (B) THE ASSOCIATION DENIED CLIENTS' THEIR RIGHTS UNDER CHAPTER 40 BY FAILING TO PROVIDE NOTICE PRIOR TO PERFORMING REPAIRS (TIME SPLIT WITH OTHER CLAIM	0.40	66.00
DMC	L240	A103	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: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.40	66.00
DMC	L160	A104	CARRIER REQUEST) 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)	0.15 0.05	24.758.25
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
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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03/23/2017

03/24/2017

			REQUEST)	Hours 0.05	8.25
	L160		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) 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	0.05	8.25
DMC	L160	A103	PROPOSED STRATEGIES PENDING CARRIER'S RESPONSE ((TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO JEFFREY GANZER OF CHUBB AND SHERILYN BRAYDON OF ESIS RE:	0.05	8.25
				0.05	8.25
DMC	L160	A104	REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRAYDON OF ESIS RE:		
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	0.05	8.25
RHR	L120	A105	IN SAME CASE/OTHER TOWER - AS PER CARRIER REQUEST). COMMUNICATE (IN FIRM) (NON-BILLABLE) TO DISCUSS CASE STRATEGY	0.10	18.50
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	0.30	n/c
DCB.	L240	A 107	CITATIONS ISSUED TO PLAINTIFF. COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL	0.45	74.25
	L120		FOR THE HOA RE: DISCUSSION OF THE LATEST MOTION FILED BY THE DEFENSE AND WHY IT WAS FILED. REVIEW/ANALYZE (NON-BILLABLE) RECENT SUPPLEMENTAL STATUS REPORT AND CASE HISTORY TO FAMILIARIZE WITH	0.05	9.25
			CASE STRATEGY AND HISTORY TO ASSIST WITH LEGAL DEFENSE MOVING FORWARD.	0.90	n/c
PCB	L240	A103	DRAFT/REVISE EMAIL TO COUNSEL FOR HOA RE:		

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				Hours	
			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	0.00	0.23
			(TIME SPLIT WITH OTHER CLAIM NO./FILE PER	0.05	0.25
	PCB L240	A107	CARRIER REQUEST) 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).	0.05	8.25
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:		
	DMC L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) SUPPLEMENTAL STATUS REPORT TO CARRIER RE:	0.85	148.75

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					Hours	
				(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		
	DMC	L120	A103	CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
		L120	A103		0.05	8.75
	DIVIC	L120	A103		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		
	MD	L320	A103	NO./FILE PER CARRIER REQUEST). 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	0.20	19.00
	DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	14.25 8.75
04/06/2017	MD	L320	A103	DRAFT/REVISE (BEGIN) RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" RE: SPECIAL INTERROGATORIES (TIME		
	DMC	L250	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.35	33.25
	DMC	L120	A104	IS NECESSARY (4 PAGES) REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.75
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE RESPONSE WITH ENCLOSURE TO E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:	0.05	8.75

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					Hours	
				(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	0.03	4.73
	MD	L320	A104	CLAIM NO./FILE PER CARRIER REQUEST). 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	0.05	4.75
	MD	L320	A104	INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).	0.10	9.50
	MD	L320	A104	PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE LAS VEGAS BUSINESS LICENSE SEARCH WEBSITE RE: ENTITY INFORMATION FOR PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC AND LAURENT HALLIER IN	0.10	9.50
	MD	L320	A104	PREPARATION FOR RESPONSES TO SPECIAL INTERROGATORIES 1 THROUGH 4 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE CLARK COUNTY CLERK'S OFFICE FICTITIOUS NAME SEARCH WEBSITE RE: ENTITY	0.10	9.50
	MD	L320	A104	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). REVIEW/ANALYZE PANORAMA TOWERS OWNER CONTROLLED INSURANCE PROGRAM INSURANCE MANUAL	0.10	9.50
	MD	L320	A104	RE: INSURANCE INFORMATION IN PREPARATION FOR RESPONSES TO CASE MANAGEMENT ORDER SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). REVIEW/ANALYZE WESTCHESTER EXCESS POLICY RE: INSURANCE INFORMATION IN PREPARATION FOR LAURENT	0.30	28.50
	MD	L320	A104	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). REVIEW/ANALYZE PRIOR LITIGATION DISCOVERY RE: CASE MANAGEMENT ORDER RESPONSES AND DISCOVERY IN PREPARATION FOR PANORAMA TOWERS I, LLC, PANORAMA	0.30	28.50
				TOWERS II, LLC AND LAURENT HALLIER'S RESPONSES TO		

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04/10/2017

04/11/2017

				Hours	
			SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM	Hours	
DMC	1 120	A 107	NO./FILE PER CARRIER REQUEST). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN	0.35	33.25
DIVIC	L120	Alui	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	0.40	47.50
DMC	L120	A104	CARRIER REQUEST) REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL	0.10	17.50
20			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		
MD	L320	Δ104	CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE NORTH LAS VEGAS BUSINESS LICENSING	0.10	9.50
טועו	L320	A10 4	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	,	0.10	0.00
			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:	0.40	30.00
			ENTITY INFORMATION FOR PANORAMA TOWERS II, LLC IN		
			PREPARATION FOR RESPONSES TO SPECIAL	0.40	0.50
			INTERROGATORIES 1-4.	0.10	9.50
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
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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					Hours	40.00
	MD	L320	A103	NO./FILE PER CARRIER REQUEST). 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	0.20	19.00
	MD	L320	A103	NO./FILE PER CARRIER REQUEST). 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	0.20	19.00
	MD	L320	A103	NO./FILE PER CARRIER REQUEST). 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	0.20	19.00
	DMC	L120	A104	REQUEST). 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)	0.15	14.25 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 MD	L320		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). 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	0.55	52.25
				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	0.70	00.00

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			CONTRACT VALUE, CHANGE ORDER, TOTAL CONTRACT	Hours	
MD	L320	A103	VALUE, AND TOWER WHERE CONTRACTOR/SUBCONTRACTOR WORKED (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN CONSTRUCTION,	0.80	76.00
MD	L320	A103	INC.'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ,	0.15	14.25
MD	L320	A103	LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "C" - INSURANCE QUESTIONNAIRE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS I MEZZ,	0.15	14.25
MD	L320	A103	LLC'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "B" - SPECIAL	0.15	14.25
MD	L320	A103	INTERROGATORIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). DRAFT/REVISE (CONTINUE AND FINALIZE) PLAINTIFF/COUNTER-DEFENDANT M.J. DEAN'S RESPONSES TO CASE MANAGEMENT ORDER EXHIBIT "D" - STATEMENT OF	0.15	14.25
MD	L320	A103	WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.10	9.50
DMC	L120	A104	"D" - STATEMENT OF WORK (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). 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	0.10	9.50
DMC	L120	A104	CROSS-CLAIM, IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
DMC	L120	A107	IS NECESSARY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S REQUEST FOR EXEMPTION FROM	0.05	8.75

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				ADDITION THE ACCOCIATIONIC DENIDING ODOCC CLAIM	Hours	
	DMC	L120	A103	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) 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	0.05	8.75
	DMC	L250	A104	CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM COLIN HUGHES (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S FILE STAMPED REQUEST FOR EXEMPTION	0.05	8.75
	DMC	L120	A103	FROM ARBITRATION, IN ORDER TO DETERMINE WHETHER ANY ACTION IS NECESSARY DRAFT/REVISE E-MAIL TO JEFFREY GANZER (ADJUSTER) RE:	0.05	8.75
	DMC	L120	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE:	0.05	8.75
				(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	(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		
	DMC	L120	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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 ADDROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE	0.05	8.75
	DMC	L120	A104	APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.25	43.75

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04/21/2017

				Hours	
DMC	L120	A104	PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CLIENT MJ DEAN'S RESPONSE TO CASE MANAGEMENT ORDER INSURANCE QUESTIONNAIRE (PREPARED BY PARALEGAL MICHELLE DOWLING) FOR	0.10	17.50
DMC	L120	A104	COMPLETENESS AND ACCURACY IN PREPARATION FOR PARALEGAL SUBMISSION TO CLIENT FOR APPROVAL OF SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.10	17.50
DMC	L120	A104	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
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	0.05	8.75
MD	1 320	۸ ۱ ۵ ۵	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)	0.05	8.75
MD	L320		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). DRAFT/REVISE SUBPOENA DUCES TECUM TO SOUTHERN NEVADA HEALTH DISTRICT RE: RECORDS FOR CITATIONS AND INSPECTIONS AT PANORAMA TOWERS.	0.10	9.50

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				Hours	
DMC	L120	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	14.25
DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
DMC	L120	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
DMC	L120	A104	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.15	26.25
DMC	L120	A104	REQUEST)	0.05	8.75
MD	L320	A104	PER CARRIER REQUEST) 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.	0.05	8.75
MD	L320	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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.	0.60	57.00
MD	L320	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE AND FINALIZE) EXHIBIT B TO CASE MANAGEMENT RESPONSES RE: SUBCONTRACTORS	0.60	57.00
			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	Hours	
				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.		
	MD	L320	A104	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE AFFIDAVIT OF SERVICE RE: CUSTODIAN OF RECORDS FOR SOUTHERN NEVADA HEALTH DISTRICT TO DETERMINE WHETHER ANY RESPONSE OR OTHER ACTION IS NECESSARY.	0.10	9.50
				(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		
	JBV	L320	A103	OBTAIN ALL REQUESTED DOCUMENTATION. DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO	0.05	4.75

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					Hours	
	DMC	L120	A104	SOUTHERN NEVADA HEALTH DISTRICT, RE: OBTAINING PERMITS/RECORDS FOR THE PROJECT SITE. 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 DESPONSE OR OTHER ACTION IS NECESSARY (TIME SPILLT	0.05	4.75
	DMC	L120	A104	RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC	L250	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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 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		
	DMC	L240	A103	CLAIM NO./FILE PER CARRIER REQUEST) 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 COMPANING (TIME SPLIT	0.40	70.00
	DMC	L240	A103	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	0.20	35.00
	DMC	L240	A103	(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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:	0.30	52.50
	DMC	L240	A103	(A) FACTS NOT DISPUTED BY THE ASSOCIATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) CLIENTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S COUNTERCLAIM AND MOTION FOR SUMMARY JUDGMENT ON	0.30	52.50

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				Hours	
			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		
DMC	L240	A103	CARRIER REQUEST) 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	0.45	78.75
DMC	L240	A103	PER CARRIER REQUEST) 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	0.30	52.50
DMC	L240	A103	SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.95	166.25
DMC	L240	A103	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	0.20	35.00
DMC	L240	A103	OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.20	35.00

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				REQUEST)	Hours 0.80	140.00
05/10/2017		L240		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. 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)	0.20	35.00 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		
	JBV	L320	A103	LEGIBLE FOR ATTORNEY ANALYSIS. DRAFT/REVISE RESPONSE EMAIL CORRESPONDENCE TO COUNSEL FOR SOUTHERN NEVADA HEALTH DISTRICT, RE: CONFIRMATION OF RECEIPT OF RECORDS IN RESPONSE TO	0.10	9.50
05/16/2017	DMC	L240	A104	SUBPOENA DUCES TECUM. 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	0.05	4.75
	DMC	L120	A104	CARRIER REQUEST) 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	0.05	8.75
				CARRIER REQUEST)	0.05	8.75

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					Hours	
	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		
	DMC	L120	A104	REQUEST) 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	0.05	8.75
	DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	0.05	8.75
	DMC	L120	A103	CARRIER REQUEST) 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	0.05 0.05	8.75 8.75
	DMC	L120	A104	WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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 RECARDING SAME (TIME SPLIT WITH OTHER	0.03	0.73
	DMC	L120	A103	MASTER HALE REGARDING SAME (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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'	0.05	8.75

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PENDING MOTION FOR SUMMARY JUDGMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DMC L250 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) DMC L120 A104 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) JBV L120 A109 APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL 0.05 8.75 U.05 8.75 JBV L310 A109 APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL 0.15 14.25		Hours				
TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DMC L120 A104 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) JBV L120 A109 APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL 0.15 14.25	26.25	0.15	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	L250 A104	DMC	
JBV L120 A109 APPEAR FOR/ATTEND CONFERENCE WITH COUNSEL 0.05 8.75 0.05 8.75 0.15 14.25	8.75	0.05	TO DETERMINE WHETHER ANY ACTION IS NECESSARY ON BEHALF OF CLIENTS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) 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	L120 A104	DMC	
	8.75	0.05	CARRIER REQUEST)	L120 A109	JBV	
			APPEAR FOR/ATTEND LITIGATION STRATEGY SESSION,	L310 A109	JWS	
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			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	L120 A104	DMC	05/18/2017
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 DSICOVERY 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) 0.40 70.00 70.00 70.00 70.00 70.00 70.00			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 DSICOVERY 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	L120 A103	DMC	
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			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	L230 A104	DMC	05/19/2017
NO./FILE PER CARRIER REQUEST) 0.05 8.75	8.75	0.05	NO./FILE PER CARRIER REQUEST)			

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					Hours	
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		
				(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		
	JBV	L350	A104	RESOLVED AND CORRECT PARTY IS SANCTIONED. REVIEW/ANALYZE ORDER REGARDING OBJECTION TO ADR COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION AND SANCTIONS AGAINST COUNSEL FOR THE HOA, RE:	0.10	9.50
	JBV	L350	A104	ENSURING PROPER COUNSEL IS SANCTIONED AND PAYS FEES. REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM PRIOR	0.05	4.75
				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		
06/19/2017	PCB	L240	A101	ENSURING COUNSEL FOR HOA IS HELD RESPONSIBLE. PLAN AND PREPARE (BEGIN) FOR TOMORROW'S HEARING ON	0.05	4.75
				MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT RE:		
	РСВ	L240	Δ101	(TIME SPLIT WITH OTHER FILE - BWB&O File #1287.558 - THAT DEALS WITH TOWER II). PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S	1.10	192.50
	T OB	LZ40	Alui	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,		
		1.000		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).		
	JWS	L230	A104	(TIME ALREADY SPLIT WITH 1287.558) REVIEW/ANALYZE (BEGIN) LEGAL RESEARCH, CASES CITED IN SUPPORT/AGAINST MOTION FOR SUMMARY JUDGMENT,	0.65	113.75
				GENERAL HOLDINGS/APPLICABILITY, AND FACTUAL		

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					Hours	
	JWS	L230	A101	SCENARIOS TO ASSIST WITH FORMULATION OF ORAL ARGUMENTS. (TIME ALREADY SPLIT WITH 1287.558) PLAN AND PREPARE FOR (CONTINUE) ORAL ARGUMENTS ON CLIENTS' MOTION FOR SUMMARY JUDGEMENT, FORMULATION OF ADDITIONAL ARGUMENTS IN SUPPORT OF RELIEF SOUGHT	0.40	70.00
				(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:		
	JWS	L230	A109	(TIME SPLIT WITH 1287.558) APPEAR FOR/ATTEND HEARING/ORAL ARGUMENTS ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT. NO TRAVEL	0.15	26.25
	IVAC	1 000	A 4 0 0	TIME IN ENTRY. (TIME ALREADY SPLIT WITH 1287.558) APPEAR FOR/ATTEND (NO CHARGE) TRAVEL TIME TO	0.65	113.75
	JWS	L230	A 109	HEARING ON CLIENT'S MOTION FOR SUMMARY JUDGEMENT.	0.50	n/c
	JWS	L230	A103			
				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:		
				(TIME SPLIT BETWEEN		
	DOD	1.040	A 4 O 4	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		
	PCB	L240	A109	FILE IN SAME CASE - 1287.558 - TOWER II). APPEAR FOR/ATTEND HEARING ON CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY	1.70	297.50
				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	РСВ	L120	A103	DRAFT/REVISE EMAILS TO CARRIERS RE:		
				(TIME SPLIT WITH OTHER FILE IN		
	.IWS	L120	A103	SAME CASE - 1287.558 - TOWER II). DRAFT/REVISE UPDATED SUMMARY TO CARRIER, RE:	0.20	35.00
	5440	L 120	, (100	D. J. M. LVIOL OF BANKE OF BANKET, INC.	0.05	8.75

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					Hours	
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		
	JWS	L210	A104	OTHER FILE IN SAME CASE - 1287.558 - TOWER II). REVIEW/ANALYZE CORRESPONDENCE, NOTES AND COURT MINUTES IN PREPARATION FOR ANTICIPATED EMERGENCY	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.	0.20	35.00 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		
	PCB	L210	A107	FOR BOMBARD, AND NOTICE TO PRODUCT MANUFACTURERS. 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	0.15	26.25

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				THE CARRIER CONTACTS AND TO THE RISK MANAGER FOR	Hours	
				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 PROJECT OF ADJUSTED.	0.70	122.50
	JWS	L210	A103	REQUEST OF ADJUSTER. DRAFT/REVISE (BEGIN) AFFIDAVIT OF PETER BROW IN SUPPORT OF CLIENT'S OPPOSITION TO THE ASSOCIATION'S		
	JWS	L210	A103	MOTION FOR ENLARGEMENT OF TIME. 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	0.10	17.50
				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	0.20	33.00
07/26/2017	PCB	L210	A107	SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR ONE OF THE SUBCONTRACTORS RE: DISCUSSION OF THE CURRENT STATUS OF THE COURT'S RULING ON THE	0.40	70.00
				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	0.00	F0 F0
	JWS	L210	A104	TWO CASE PER ADJUSTER. REVIEW/ANALYZE AND OUTLINE HOA'S REPLY TO CLIENT'S OPPOSITION TO MOTION TO ENLARGE SERVICE ON DEFENDANTS. SPLIT WITH TOWER TWO CASE PER	0.30	52.50

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

				ADJUSTER.	Hours 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, (TIME SPLIT WITH OTHER		
	PCB	L250	A109	FILE IN SAME CASE - 1297.558 - TOWER II). 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;	0.40	70.00
	РСВ	L250	A103	NO TRAVEL TIME INCLUDED IN THIS ENTRY). DRAFT/REVISE PROPOSED ORDER DENYING THE HOA'S MOTION TO ENLARGE TIME (TIME SPLIT WITH OTHER FILE IN	0.70	122.50
08/09/2017	JWS	L110	A107	SAME CASE - 1287.558 - TOWER II). 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	0.05	8.75
	JWS	L230	A103	WITH TOWER TWO FILE PER ADJUSTER. DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE RE: CASE STATUS, PENDING RULING FROM JUDGE, AND	0.10	17.50
	JWS	L230	A104	REQUEST TO CONTINUE HEARING. REVIEW/ANALYZE CORRESPONDENCE/RESPONSE FROM SPECIAL MASTER HALE RE: STATUS UPDATE/REQUEST TO	0.10	17.50
08/10/2017	JWS	L230	A104	CONTINUE HEARING. REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: UPCOMING STATUS CHECK HEARING.	0.05	8.75
	JWS	L230	A103	NEED TO MOVE FORWARD WITH THE SAME. DRAFT/REVISE CORRESPONDENCE TO SPECIAL MASTER HALE, MEET AND CONFER RE: BASIS FOR CONTINUATION OF	0.05	8.75
	JWS	L230	A104	HEARING BASED ON PROCEDURAL POSTURE OF CASE. REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER HALE RE: APPROVAL OF REQUEST TO CONTINUE HEARING BASED ON PROCEDURAL POSTURE OF CASE.	0.10 0.05	17.50 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 Total Non-billable Hours	45.62 2.40	7,123.67

<u>Total</u>

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<u>Hours</u>

Rate

Recapitulation

<u>Title</u>

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

Timekeeper

Peter C. Brov			PARTNER	7.85	\$175.38	\$1,376.75
Jeffrey W. Sa			ASSOCIATE	7.90	183.86	1,452.50
Jennifer Vela			PARALEGAL	0.75	95.00	71.25
Darlene M. C			ASSOCIATE	18.87	170.53	3,217.92
Rochelle A. H		ed	ASSOCIATE	0.45	165.00	74.25
Michelle Dow	/ling		PARALEGAL	9.80	95.00	931.00
			Expenses			
03/02/2017	L100	E109	LOCAL TRAVEL (8799) DARLENE M. CAR' SPECIAL MASTER HEARING) (30 MILES A OTHER CLAIM 558)			4.02
03/20/2017	L100	E112	WIZ-NET (PLAINTIFFS/COUNTER DEFENI HALLIER'S, PANORAMA TOWERS I, LLC'S MEZZ, LLC'S, AND M.J. DEAN CONSTRUCT SUMMARY JUDGMENT ON DEFENDANT/C PANORAMA TOWER CONDOMINIUM UNI'C COUNTER CLAIM AND PLAINTIFFS/COUN LAURENT HALLIER'S, PANORAMA TOWE TOWERS I MEZZ, LLC'S AND M.J. DEAN C MOTION FOR PARTIAL SUMMARY JUDGME CLAIM FOR RELIEF IN THEIR COMPLAINT	S, PANORAMA TON CTION, INC.'S MOT COUNTER CLAIMA T OWNERS' ASSO ITER DEFENDANT RS I, LLC'S, PANO CONSTRUCTION, I MENT ON THEIR T	TION FOR NT CIATION'S S PRAMA NC.'S HIRD	
			RELIEF)	TO TO BE OF THE TOTAL	0111	52.38
03/30/2017	L100	E102	OUTSIDE PRINTING (CLARK COUNTY'S F			
00/00/0047	1.400	E400	DOCUMENTS) (SPLIT BETWEEN 1287.55			2.76
03/30/2017	L100	E123	OTHER PROFESSIONALS (2407) PAUL A FROM CLARK COUNTY RECORDER'S OF		ENIS	2.07
03/31/2017	L100	F101	REPRODUCTION COSTS FOR MARCH 20		_	2.07
00/01/2017	2.00		.08/PAGE)	(000 : 7.020 7.1		32.00
04/04/2017	L100		WIZ-NET (NOTICE OF ENTRY OF STIPULA CONTINUE HEARING ON PLAINTIFFS/CO LAUREN HALLIER'S PANORAMA TOWERS TOWERS I MEZZ, LLC'S AND M.J. DEAN OMOTION FOR SUMMARY JUDGMENT ON CLAIMANT PANORAMA TOWERS CONDOWNERS CONTRUCTION'S COUNTER CLAIM AND PRANORAMA TOWERS I MEZZ, LLC'S AND CONSTRUCTION, INC.'S MOTION FOR PAUDGMENT ON THEIR THIRD CLAIM FOR COMPLAINT FOR DECLARATORY RELIEF WIZ-NET (STIPULATION AND ORDER TO PLAINTIFFS/COUNTER DEFENDANTS LA PANORAMA TOWERS I, LLC'S, PANORAMAND M.J. DEAN CONSTRUCTION, INC.'S IN JUDGMENT ON DEFENDANT/COUNTER OF TOWERS CONDOMINIUM UNIT OWNERS CLAIM AND PLAINTIFFS/COUNTER DEFE HALLIER'S PANORAMA TOWERS I, LLC'S	UNTER DEFENDA S I, LLC'S, PANOR CONSTRUCTION, I DEFENDANT/COU MINIUM UNIT OW LAINTIFFS/COUN' ORAMA TOWERS M.J. DEAN RTIAL SUMMARY RELIEF IN THEIR CONTINUE HEARI UREN HALLIER'S MA TOWERS I MEZ MOTION FOR SUM CLAIMANT PANOR NDANTS LAUREN PANORAMA TOV	NTS AMA NC.'S INTER NERS' IFER I, LLC'S, ING ON IZ, LLC'S IMARY AMA COUNTER T VERS I	1.75
			MEZZ, LLC'S AND M.J. DEAN CONSTRUC PARTIAL SUMMARY JUDGMENT ON THE RELIEF IN THEIR COMPLAINT FOR DECL	IR THIRD CLAIM F	OR	1.75
			THE THE THE TOTAL PROPERTY OF THE PERTY OF T	, J. (I OI (I I LEILI	,	1.70

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04/30/2017 05/01/2017	L100 L100		REPRODUCTION COSTS FOR APRIL 2017 (209 PAGES AT .08/PAGE) SERVICE OF PROCESS (9999) AMERICAN LEGAL SERVICES	8.36
			NEVADA (INVOICE #37010107 SUBPOENA DUCES TECUM & NOTICE - SOUTHERN NEVADA HEALTH DISTRICT, LAS VEGAS / SERVICES	
05/10/2017	L100	E112	RENDERED ON 4/24/17)(SPLIT WITH 1287.558) WIZ-NET (PLAINTIFFS/COUNTER DEFENDANTS LAURENT	15.47
			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 JUDGEMENT ON THEIR THIRD CLAIM FOR	4 77
05/16/2017	L100	E112	RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) ODYSSEY (RE-NOTICE OF HEARING ON PLAINTIFFS/COUNTER	1.75
			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	1.75
05/31/2017	L100	F101	RELIEF IN THEIR COMPLAINT FOR DECLARATORY RELIEF) REPRODUCTION COSTS FOR MAY 2017 (1194 PAGES AT .08/PAGE)	47.76
06/01/2017	L100		ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA	
			(INVOICE #37010343 FILING FEE: ADR COMMISSIONER OFFICE /	
00/04/0047	1.400	E440	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 / SERVICESPROVIDED ON 5/10/17)	22.34
06/01/2017	L100	E112	COURT FEES (9999) AMERICAN LEGAL SERVICES NÉVADA (INVOICE	
			#37010343 TO DELIVER - EIGHTH JUDICIAL DISTRICT COURT /	0.00
06/01/2017	L100	F112	SERVICES PROVIDED ON 5/11/17) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE	2.88
00/01/2017	L100	LIIZ	#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	2.00
			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	F101	REPRODUCTION COSTS FOR JUNE 2017 (319 PAGES AT 0.08/PAGE)	3.75 12.76
07/17/2017	L100		ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC,	12.70
			PANORAMA TOWERS 1 MEZZ, LLC AND M.J. DEAN CONSTRUCTION,	
			INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S	4 75
07/31/2017	L100	F101	MOTION TO ENLARGE TIME) REPRODUCTION COSTS FOR JULY 2017 (96 PAGES AT .08/PAGE)	1.75 3.84
08/01/2017	L100		COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE	3.01
			#37011415 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES	

0367 AA3076

CHUBB INSURANCE

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Statement No: 10

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

				PROVIDED ON 07/18/2	017)			2.88		
08/01/2	2017	L100	E109	LOCAL TRAVEL (134) F		RKING) (SPLIT WIT	Н	2.25		
08/03/2	2017	L100	E112		COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE					
08/07/2	2017	L100	E112	ODYSSEY (NOTICE OF	37011682 FILING - EIGHTH JUDICIAL DISTRICT COURT) DYSSEY (NOTICE OF ENTRY OF ORDER DENYING DEFENDANT					
					CONDOMINIUM UNIT O ON TO ENLARGE TIME			1.75		
08/07/2	2017	L100	E112	ODYSSEY (ORDER DE	NYING DEFENDANT PA DWNERS' ASSOCIATION		RS			
08/31/2	2017	L100	E101	ENLARGE TIME FOR S	SERVICE)			1.75		
00/01/2	.017	L100	LIUI	.08/PAGE)	1010114000012011	(2201 AOLO A1		9.12		
				Total Expenses				273.98		
				Total Current Work				7,397.65		
				Previous Balance				\$17,025.63		
					<u>Payments</u>					
04/18/2	2017			PAYMENT RECEIVED -	- THANK YOU (ESIS - CI	HECK NO FA78616	6732 /			
04/18/2	2017			STMT #8)	- THANK YOU (ESIS - CI	HECK NO E478616	3733 /	-5,787.14		
				STMT #7)	•			-7,697.47		
04/18/2	2017			STMT #9)	- THANK YOU (ESIS - CI	HECK NO FA78610	5731 /	-9,360.14		
04/20/2	2017			PAYMENT RECEIVED - STMT #7)	- THANK YOU (ESIS - CI	HECK NO FA7861	6746 /	-7,146.72		
				Total Payments				-29,991.47		
				Credit Balance				-\$5,568.19		
				Culti	t Dilling Comment					
				Spili	t Billing Summary Fees	Expenses	Advances	Total		
	INSURANCE				7,123.67	273.98	0.00	7,397.65		
ESIS D	allas AGL Cla	ıms (2) -	Panorar	ma Tower II	6,747.33	273.89 547.87	$\frac{0.00}{0.00}$	7,021.22 14,418.87		
					13,871.00	547.67	0.00	14,410.01		
				Task 0	Code Recapitulation					
1.400	0405 4005	0014515	- DE\/-	ODMENIT AND ADMINI			Fees	Expenses		
L100 L110	FACT INVES			LOPMENT AND ADMINIS	STRATION		0.00 17.50	273.98 0.00		
L120	ANALYSIS/S	TRATE	SΥ				1362.41	0.00		
L160 SETTLEMENT/NON-BINDING ADR 66.00								0.00		
L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION 70.00 L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION 1,515.91								$\frac{0.00}{273.98}$		
L100			i, D∈VE	LOT WENT AND ADMINIS	SINATION		1,515.91			
L210	PLEADINGS		CONTE	DENCES			865.25	0.00		
L230 L240	COURT MAN			INCINCES			656.26 2722.50	0.00 0.00		
L250				S AND SUBMISSIONS			332.00	0.00		

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

		<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

0369 AA3078

Final Statement Run Totals 09/01/2017

1
45.62
7,123.67
273.98

0370 AA3079

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 Page: 1
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Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

Fees

				1 003		
					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.		
	JWS	L210	A103	SPLIT TIME WITH TOWER TWO CASE. DRAFT/REVISE (BEGIN) OPPOSITION TO THE ASSOCIATION'S MOTION TO AMEND PLEADINGS, FACTS, AFFIDAVIT, ARGUMENTS, AND PRAYER FOR RELIEF. PER ADJUSTER,	0.30	52.50
	JWS	L210	A104	SPLIT TIME WITH SECOND TOWER CASE. 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	0.90	157.50
				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		
	JWS	L120	A104	TIME WITH TOWER II CASE PER ADJUSTER. REVIEW/ANALYZE (LIMITED SCOPE) CORRESPONDENCE/MOTES TO ASSIST WITH RESPONDING TO WESTERN NATIONAL ADJUSTER, LORALEE THATCHER. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.05	8.75 17.50
				0371	AA3080	
					11115000	

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					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	0.10	20.23
	PCB	L240	A106	WITH TOWER II). 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	0.20	35.00
				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		
	PCB	L120	A104	(AS PER CARRIER REQUEST - TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE ORIGINAL CC&RS	0.60	105.00
				(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/OPPOSTION TO SAME, IN ORDER TO ASSIST WITH	0.10	17.50
				UPCOMING HEARING ON MOTION TO AMEND. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.10	17.50
				0372	AA3081	

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					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, (AS PER CARRIER REQUEST - TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.20	35.00
10/02/2017	IVVC	1.240	A 100	,	0.20	33.00
10/03/2017	JVVS	L340	A100	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE:	0.10	17.50
10/04/2017	JWS	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT WITH MKA,	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	0.00	0.73
	JBV	L320	A108	PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.10	9.50
	JBV	L320	A103	AS REQUESTED BY ATTORNEY, PRIOR TO UPCOMING MEETING. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.05	4.75
					0.05	4.75
10/05/2017	JWS	L340	A101	PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERT, MKA, RE: PER ADJUSTER, SPLIT TIME	0.00	50.50
	JWS	L340	A108	WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE:	0.30	52.50
				PER ADJUSTER TIME TO BE SPLIT WITH OTHER TOWER CASE. 0373	0.15 AA3082	26.25
				VS.12	11115002	

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	JWS	L340	A104	REVIEW/ANALYZE PRESENTATION PREPARED BY MKA RE:	Hours	
				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		L250		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
	. 05		,,,,	COMPARE SAME TO MOTIONS FILED IN OTHER CASES DEALING WITH AB 125 (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER		
	JWS	L240	A104	DIRECTIVE OF CARRIER). REVIEW/ANALYZE AND OUTLINE MOTION FOR RECONSIDERATION WITH BACK UP IN PREPRATION OF OPPOSITION TO THE SAME. PER ADJUSTER, SPLIT WITH TOWER II FILE.	0.10 0.25	17.50 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	0.75
	JWS	L240	A104	REVIEW/ANALYZE ATTORNEY NOTES, CORRESPONDENCE, COURT FILINGS AND MINUTE ORDER TO ASSIST WITH OPPOSITION TO MOTION FOR	0.05	8.75
	JWS	L240	A103	CLARIFICATION/RECONSIDERATION. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. DRAFT/REVISE (BEGIN) OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION. FACTS, PROCEDURAL	0.25	43.75
				0374	AA3083	

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					Hours	
				SUMMARY, LEGAL STANDARD AND INITIAL ARGUMENT. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.85	148.75
10/27/2017		L240		DRAFT/REVISE (SUPPLEMENTED) OPPOSITION TO MOTION FOR CLARIFICATION RE: FIRE BLOCKING ARGUMENT.PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. COMMUNICATE (OTHER EXTERNAL) WITH SHELLY FROM MKA,	0.15	26.25
	РСВ	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS	0.10	17.50
				(EXPERT) RE: (TIME SPLIT WITH FILE IN SAME CASE - TOWER II -		
	PCB	L250	A104	AS PER DIRECTIVE OF THE CARRIER). 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	0.20	35.00
	JWS	L350	A108	CARRIER). COMMUNICATE (OTHER EXTERNAL) INITIAL CALL WITH EXPERT MKA,	0.60	105.00
	JWS	L350	A104	REVIEW/ANALYZE PLANS FOR BOTH TOWERS 1 AND 2 AS PREPARTION OF FURTHER DISCUSSION. PER ADJUSTER, SPLIT TIME WITH SECOND	0.10	17.50
	JWS	L350	A108	TOWER CASE PER ADJUSTER REQUEST. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH EXPERT, MEET AND CONFER RE:	0.15	26.25
	JWS	L350	A107	ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. 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.	0.15	26.25 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

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10/31/2017	JWS	L120	Δ107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH FRANCIS	Hours	
10/31/2017	3443	L120		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		
	JWS	L340	A108	REQUEST. COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE: SPLIT TIME	0.10	17.50
	JWS	L340	A108	WITH TOWER TWO CASE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE:	0.10	17.50
				WITH SECOND TOWER FILE.	0.10	17.50
11/01/2017	JWS	L120	A101	PLAN AND PREPARE FOR (BEGIN) CALL WITH EXPERT, MKA,		
	JWS	L120	A108		0.30	52.50
	JWS	L120	A103	SPLIT TIME WITH TOWER 2 CASE. DRAFT/REVISE SUMMARY OF CALL WITH EXPERT	0.35	61.25
				SPLIT TIME WITH TOWER TWO CASE.	0.15	26.25
11/02/2017	JWS	L120	A101	PLAN AND PREPARE FOR EXPERT MEETING WITH MKA,		
	JWS	L120	A109	SPLIT WITH TOWER 2 CASE. APPEAR FOR/ATTEND CONFERENCE CALL WITH EXPERT MKA,	0.45	78.75
	JWS	L120	A104	SPLIT TIME WITH TOWER 2 CASE. REVIEW/ANALYZE CORRESPONDENCE FROM COURT RE: STIPULATION AND HEARING ON MOTION FOR CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER	0.15	26.25
	JWS	L120	A107	FILE COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH PLAINTIFF'S COUNSEL X 3, MEET AND CONFER RE:	0.05	8.75
	JWS	L120	A103	PROPOSED/REVISED STIPULATION AS TO MOTION FOR CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. DRAFT/REVISE PROPOSED/REVISED STIPULATION AND ORDER RE: MOTION FOR CLARIFICATION IN ACCORDANCE WITH DIRECTIVE FROM JUDGE JOHNSON. PER ADJUSTER	0.15	26.25
				0376	AA3085	

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				REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	Hours 0.15	26.25
11/03/2017	JWS	L120	A103	DRAFT/REVISE (BEGIN) SUMMARY OF EXPERT ANALSYIS RE:		
	JWS	L230	A101	SPLIT TIME WITH SECOND TOWER FILE. 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	0.20	35.00
	PCB	L240	A104	FILE. REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC REGARDING IMPACT OF THE COURT'S RULING ON THE MECHANICAL ROOM DEFECTS AND PREPARE EMAIL IN	0.30	52.50
	РСВ	L130	A108	RESPONSE TO SAME (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). COMMUNICATE (OTHER EXTERNAL) WITH CLIENTS' EXPERT (MKA) RE:	0.05	8.75
				(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.	0.13	20.23
	JWS	L230	A103	NO TRAVEL TIME IN ENTRY. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE DRAFT/REVISE (BEGIN) SUMMARY OF MANDATORY COURT HEARING, AND JUDGE'S COMMENTS TO ASSIST WITH	0.45	78.75
				FURTHER CASE HANDLING. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.05	8.75
11/21/2017		L250		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). 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	1.10	192.50
				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		
				0377	AA3086	

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					Hours	
	ENTRY). 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		1.60	280.00		
	JWS	L230	A109	WITH SECOND TOWER FILE. 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.	0.20	35.00
				HOWEVER, PCB ATTENDED ENTIRE HEARING PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	1.05	183.75
11/29/2017	FLIPPINS TRENCHING, MEET AND CONFER RE: CASE ACTIVITY. PER ADJUSTER, SPLIT TIME WITH TOWER TWO				0.40	47.50
	JWS	L120	A108	FILE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP, PER REQUEST OF ADJUSTER FOR FLIPPINS TRENCHING, RE: OUTCOME OF MOTION FOR SUMMARY JUDGEMENT,	0.10	17.50
	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> Peter C. Brown Jeffrey W. Saab Jennifer Vela				Title Hours Rate PARTNER 5.50 \$175.00 ASSOCIATE 10.40 175.00 PARALEGAL 0.20 95.00	<u>Total</u> \$962.50 1,820.00 19.00	
				<u>Expenses</u>		
09/11/2017	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 E11		E112	COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012091 FILING - EIGHTH JUDICIAL DISTRICT COURT)		2.87	
09/25/2017 L100		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		2.01
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) 09/30/2017 L100 E101 REPRODUCTION COSTS FOR SEPTEMBER 2017 (13 PAGES AT				1.75		

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Statement No:

		.08/PAGE)	0.52			
10/01/2017	L100 E	112 COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE				
		#37012255 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES	45.87			
10/01/2017	L100 E	PROVIDED ON 09/27/2017)(AMOUNT INCLUDES ADV CK OF \$86.00) 121 ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC LOS	45.67			
10/01/2017	L100 L	ANGELES (INVOICE NO. 0004147084-260)	74.25			
10/19/2017	L100 E	124 PARKING (6714) JEFFREY W. SAAB (HEARING)	4.50			
10/27/2017		112 ODYSSEY (LAURENT HALLIER, PANORAMA TÓWERS 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 E	101 REPRODUCTION COSTS FOR OCTOBER 2017 (536 PAGES AT	1.73			
		.08/PAGE)	21.44			
11/01/2017	L100 E	112 COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE				
		#37012611 FILING - EIGHTH JUDICIAL DISTRICT COURT / SERVICES				
4.4/0.4/0.0.47		PROVIDED ON 10/30/2017)	2.87			
11/01/2017	L100 E	112 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 E	121 ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC LOS	10.07			
		ANGELES (INVOICE NO. 0004176986-260)	24.75			
11/02/2017	L100 E	112 COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE				
		#37012825 FILING - EIGHTH JUDICIAL DISTRICT COURT)	2.87			
11/07/2017	L100 E	112 ODYSSEY (STIPULATION AND ORDER TO CONTINUE HEARING ON				
		PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION)	1.75			
11/08/2017	L100 E	112 ODYSSEY (NOTICE OF ENTRY OF STIPULATION AND ORDER TO	1.73			
11/00/2011	2100 2	CONTINUE HEARING ON PANORAMA TOWERS CONDOMINIUM UNIT				
		OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION)	1.75			
11/30/2017	L100 E	101 REPRODUCTION COSTS FOR NOVEMBER 2017 (266 PAGES AT				
40/04/0047	1.400 =	.08/PAGE)	10.64			
12/01/2017	L100 E	I21 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				
10/11/2017		#9)	-3,015.21			
		",	0,0 .0.2 .			
		Balance Due	<u>\$7,280.06</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>						
	3,141.2					

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	<u>Split</u>	Billing Summary			
<u>Fees</u> <u>Expenses</u>				Advances	Total
CHUBB INSURANCE - Panorama Tower I 2,801.50 339.79				0.00 0.00	3,141.29
ESIS E	ESIS Dallas AGL Claims (2) - Panorama Tower II 2,801.50 339.75				3,141.25
	5,603.00 679.54				6,282.54
	Task C	Code Recapitulation			
				<u>Fees</u>	Expenses
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINIS	STRATION		0.00	339.75
L120	ANALYSIS/STRATEGY			665.00	0.00
L130	30 EXPERTS/CONSULTANTS				0.00
L100	L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION				339.75
1.040	DI FARINGO			207.52	0.00
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

EXHIBIT "G"

Electronically Filed 11/30/2018 8:44 AM Steven D. Grierson **CLERK OF THE COURT**

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SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII

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**

1

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

Third-Party Plaintiff,

Vs.

SIERRA GLASS & MIRROR, INC.; F. ROGERS CORPORATION; DEAN ROOFING COMPANY; FORD CONSTRUCTING, INC.; INSULPRO, INC.; XTREME EXCAVATION; SOUTHERN NEVADA PAVING, INC.; FLIPPINS TRENCHING, INC.; BOMBARD MECHANICAL, LLC; R. RODGERS CORPORATION; FIVE STAR PLUMBING & HEATING, LLC dba SILVER STAR PLUMBING; and ROES 1 through 1000, inclusive,

Third-Party Defendants.1

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

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

¹As 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."

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

FINDINGS OF FACT AND PROCEDURAL HISTORY

- 1. As this Court previously found in its September 15, 2017 Findings of Fact,
 Conclusions of Law and Order, this case arises as a result of alleged constructional defects within
 both the common areas and the 616 residential condominium units located within two tower
 structures of the PANORAMA TOWERS located at 4525 and 4575 Dean Martin Drive in Las
 Vegas, Nevada.
- 2. On February 24, 2016, Defendant/Counter-Claimant PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION served its original NRS 40.645 Notice of Constructional Defects upon Plaintiffs/Counter-Defendants (also identified herein as the "Contractors" or "Builders"), identifying the following deficiencies:
 - 1. Residential tower windows—There are two tower structures in the Development, consisting of 616 residential condominium units located above common areas and retails (sic) 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. 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.

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

²SCOTT A. WILLIAMS, ESQ. of the law firm, WILLIAMS & GUMBINER, also appeared telephonically on behalf of PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION. Via Minute Order filed 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.

As a consequence of this deficiency, water that should have drained to the exterior of the building has been entering into 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. Further, this damage to the metal components of the tower structures presents an unreasonable risk of injury to a person or property resulting from the degradation of these structural assemblies.

2. Residential tower fire blocking—The plans called for fire blocking insulation, 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 deter the spread of fire from one tower unit to the units above or below. However, the insulation was not installed as required by the plans and building code.

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

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

- 3. Mechanical room piping—The piping in the two lower and two upper mechanical rooms in the two tower structures has sustained corrosion damage as described in the attached ATMG report dated November 17, 2011. ...
- 4. Sewer problem—The main sewer line connecting the Development to the city sewer system ruptured due to installation error during construction, causing physical damage to adjacent common areas. This deficiency has been repaired. In addition to causing damage, the defective installation presented an unreasonable risk of injury to a person or property resulting from the disbursement of unsanitary matter.³
- 3. The Contractors elected to inspect the constructional defects identified within the Association's NRS 40.645 Notice on March 24, 2016. 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.

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

- 4. On March 29, 2016, the Contractors' lawyer sent a letter to the attorneys for the Association, requesting "information regarding the alleged sewer line, including the date of occurrence and the date of repair. ...In addition, please confirm the current location of any sewer line materials that were removed and replaced as part of the repair." Further, counsel requested "the date(s) when that work [in replacing the pipes in the mechanical room] was done and the identity of the contractor(s). Please also confirm whether and where the removed pipes have been stored for safekeeping." As there was no response from the Owners' Association to the March 29, 2016 correspondence, the Contractors' attorney followed-up with another letter sent a month later, April 29, 2016. However, there was also no response to the April 29, 2016 letter.
- 5. The Contractors thereafter responded to the Association's NRS 40.645 notice, and the parties subsequently engaged in the NRS 40.680 pre-litigation mediation with no success on September 26, 2016.
- 6. The Contractors filed their Complaint on September 28, 2016 against the Owners' Association, asserting the following claims, mostly dealing with their perception the NRS 40.645 notice was deficient:
 - 1. Declaratory Relief—Application of AB 125;
 - 2. Declaratory Relief—Claim Preclusion;
 - 3. Failure to Comply with NRS 40.600, et seq.;
 - 4. Suppression of Evidence/Spoliation;

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.

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.

SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII

- 9. The Owners' Association opposed, arguing its NRS 40.645 notice is presumed to be valid, and further, the notice statutes are meant to require substantial as opposed to technical or strict compliance. Further, in the Association's view, the Contractors' interpretation of AB 125 was not reasonable, led to absurd results and violated due process. Notwithstanding these arguments, if this Court found the notice to be deficient, the appropriate remedy would be to stay the case and provide curative instructions as opposed to dismissal of the Counter-Claim. See NRS 40.647(2)(b).
- 10. This Court heard the matter on June 20, 2017, and thereafter, on September 15, 2017, issued its 20-page Findings of Fact, Conclusions of Law and Order, granting Plaintiffs'/Counter-Defendants' motion in part. This Court also ordered Defendant's/Counter-Claimant's claim for constructional defects located in the mechanical rooms were dismissed as time-barred pursuant to the statute of limitations set forth in NRS 11.202. Further, this Court found and concluded the NRS 40.645 Notice of Constructional Defects served February 24, 2016 was deficient, and Plaintiffs/Counter-Defendants met their burden of overcoming the presumption of the notice's validity. However, this Court declined to dismiss Defendant's/Counter-Claimant's Counter-Claim pursuant to NRS 40.647(2)(a) as such would prevent the Association from filing another action. This Court stayed the proceedings with respect to constructional defects relating to window assemblies, fire blocking and sewer problems for a period of six (6) months.
- 11. On April 5, 2018, the Association served the Contractors with an Amended NRS Chapter 40 Notice of Constructional Defects. Within this amendment, Defendant/Counter-Claimant incorporated by reference information contained in the February 24, 2016 Notice. It set forth the constructional defects as follows:

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

SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII

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 insultation (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.

3. Sewer problem

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

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

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

- amended NRS 40.645 notice as, in their view, it does not cure the deficiencies identified in the initial one. Specifically, with respect to the window assemblies, of which there are over 9,500 within the towers, the Contractors quotes this Court in its September 25, 2017 Order and argue the Association did not provide specific detail of each defect, damage and injury within the revised notice.

 Concerning the insulation claims, the Contractors again quoted this Court, and noted the "specific detail" requirement of NRS 40.645 necessitates the exact location of the defect in each unit, whether it be within the ledger shelf cavity, the steel stud framing hollow space, or in both areas. Further, there is nothing specified how the Association knows this particular "installation deficiency" exists in all or 100 percent of all the residential tower units. Lastly, the Contractors argue the Association does not dispute Plaintiffs/Counter-Defendants have been divested of their statutory right to inspect and repair the sewer deficiencies.
- 13. The Association opposes, arguing, *first*, summary judgment is precluded as the requirement for it to provide notice of constructional defects is eviscerated once the Contractors initiated a legal action. *See* NRS 40.645(4). *Second*, and notwithstanding the first point, the 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

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

CONCLUSIONS OF LAW

- 1. As this Court previously stated in its September 15, 2017 Findings of Fact,

 Conclusions of Law and Order, summary judgment is appropriate and "shall be rendered forthwith" when the pleadings and other evidence on file demonstrates no "genuine issue as to any material fact [remains] and that the moving party is entitled to a judgment as a matter of law." See NRCP 56(c); Wood v. Safeway, Inc., 121 Nev. 724, 729, 121 P.3d 1026 (2005). The substantive law controls which factual disputes are material and will preclude summary judgment; other factual disputes are irrelevant. <u>Id.</u>, 121 Nev. at 731. A factual dispute is genuine when the evidence is such that a rational trier of fact could return a verdict for the non-moving party. <u>Id.</u>
- 2. While the pleadings and other proof must be construed in a light most favorable to the non-moving party, that party bears the burden "to do more than simply show that there is some metaphysical doubt" as to the operative facts in order to avoid summary judgment being entered in the moving party's favor. Matsushita Electric Industrial Co. v. Zenith Radio, 475, 574, 586 (1986), cited by Wood, 121 Nev. at 732. The non-moving party "must, by affidavit or otherwise, set forth specific facts demonstrating the evidence of a genuine issue for trial or have summary judgment

entered against him." <u>Bulbman, Inc. v. Nevada Bell</u>, 108 Nev. 105, 110, 825 P.2d 588, 591 (1992), cited by <u>Wood</u>, 121 Nev. at 732. The non-moving party "'is not entitled to build a case on the gossamer threads of whimsy, speculation, and conjecture." <u>Bulbman</u>, 108 Nev. at 110, 825 P.2d 591, quoting <u>Collins v. Union Fed. Savings & Loan</u>, 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).

 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," and based upon that notice, allow the contractor time and opportunity to inspect and make repairs when a deficiency was verified. 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.
- 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.

This 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).

It now provides:

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

- (a) Include a statement that the notice is being given to satisfy the requirements of this section;
- (b) Identify in *specific* detail each defect, damage and injury to each residence or appurtenance that is the subject of the claim including, without limitation, the exact location of each such defect, damage and injury;
- (c) Describe in reasonable detail the cause of the defects if the cause is known and the nature and extent that is known of the damage or injury resulting from the defects; and
- (d) Include a signed statement, by each named owner of a residence or appurtenance in the notice, that each such owner verifies that each such defect, damage and injury specified in the notice exists in the residence or appurtenance owned by him or her. If a notice is sent on behalf of a homeowners' association, the statement required by this paragraph must be signed under penalty of perjury by a member of the executive board or an officer of the homeowners' association. (Emphasis added)
- 5. While NRS 40.645 was revised to include more stringent requirements within the pre-litigation notice to contractors, such notices still are presumed valid. See D.R. Horton, Inc., 123 Nev. at 481. A contractor who wishes to challenge the adequacy of a pre-litigation notice bears the burden of doing so with specificity. Id. Because each case is factually distinct, the district courts have wide discretion to consider each contractor's challenge to the reasonableness¹² of each pre-litigation notice. As noted by the Nevada Supreme Court in D.R. Horton, Inc., 123 Nev. at 481, "the district courts are well suited to determine whether a notice preserves a contractor's opportunity to repair."
- 6. NRS 40.647(1) also sets forth other requirements such as the claimant must allow inspection of and reasonable opportunity to the contractor to repair the defect. Further, he or his expert is required to be present at the inspection. NRS 40.647(1) specifically states:

¹²The Nevada Supreme Court's decision in <u>D.R. Horton, Inc.</u>, 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.