

IN THE SUPREME COURT OF NEVADA

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

Appellant,

vs.

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

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

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

APPELLANT'S APPENDIX VOL 18 OF 27

FRANCIS I. LYNCH (#4145)
LYNCH & ASSOCIATES LAW GROUP
1445 AMERICAN PACIFIC DRIVE
STE 110 #293
HENDERSON, NV 89074

MICHAEL J. GAYAN (#11135)
JOSHUA D. CARLSON (#11781)
KEMP JONES, LLP
3800 HOWARD HUGHES PKWY, 17TH FL.
LAS VEGAS, NV 89169

SCOTT WILLIAMS (*pro hac vice*)
WILLIAMS & GUMBINER, LLP
1010 B STREET, STE 200
SAN RAFAEL, CA 94901

Attorneys for Appellant

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1 by a defendant after the statute has expired. In short, whether the Association's counter-claims are
2 compulsory or permissive, the filing of the Builders' Complaint did not toll the statute of repose.

3 **19.** The next question is whether good cause exists for this Court to toll the statute of
4 repose for a longer period as so authorized in NRS 40.695(2). The Association proposes there is
5 good cause given their diligence in prosecuting their constructional defect claims, and, as they are
6 seeking tolling of only five (5) days after the one (1) year anniversary of the original NRS 40.645
7 notice, the Builders' ability to defend the deficiency causes of action has not been adversely
8 impacted. In making this argument, the Association seems to assume the tolling under NRS 40.695
9 ended February 24, 2017, or one (1) year after it served the NRS 40.645 notice when, in actuality,
10 the tolling ended October 26, 2016, or thirty (30) days after the NRS 40.680 mediation. *See*
11 40.695(1). The Association does not show this Court good cause exists for its failure to institute
12 litigation before October 26, 2016. Whether the Builders' ability to defend the Association's claim
13 is not adversely affected is, therefore, not relevant to the issue of good cause. Accordingly, this
14 Court declines tolling the statute of repose for a period longer than one (1) year after the NRS
15 40.645 notice was made. The Builders' Motion for Summary Judgment is granted, and the
16 Association's Conditional Counter-Motion for Relief is denied.

17 **20.** As this Court decides the six-year statute of repose bars the Association's
18 constructional defect claims, it does not analyze the statute of limitations issue presented.

19 Therefore, based upon the foregoing Findings of Fact and Conclusions of Law,
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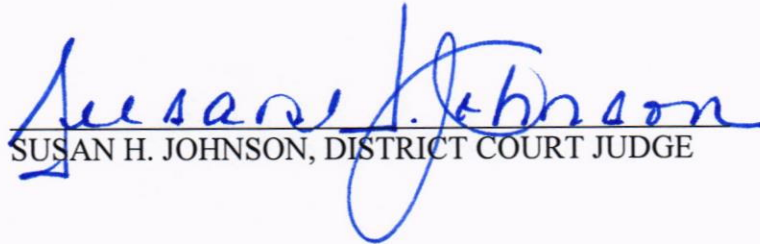
21 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** Plaintiffs'/Counter-
22 Defendants' Motion for Summary Judgment Pursuant to NRS 11.202(1) filed February 11, 2019 is
23 granted; and
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25 ...
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27 ...
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1 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** Defendant's/Counter-
2 Claimant's Conditional Counter-Motion for Relief Pursuant to NRS 40.695(2) filed March 1, 2019
3 is denied.

4 DATED this 23rd day of May 2019.

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7 _____
8 SUSAN H. JOHNSON, DISTRICT COURT JUDGE
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CERTIFICATE OF SERVICE

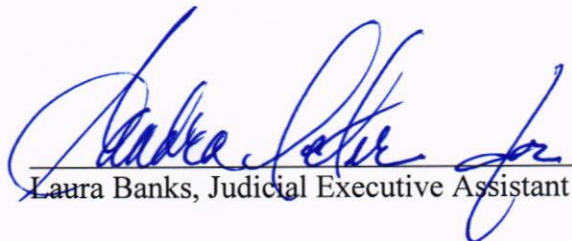
I hereby certify, on the 23rd day of May 2019, I electronically served (E-served), placed within the attorneys' folders located on the first floor of the Regional Justice Center or mailed a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER to the following counsel of record, and that first-class postage was fully prepaid thereon:

PETER C. BROWN, ESQ.
BREMER WHYTE BROWN & O'MEARA, LLP
1160 North Town Center Drive, Suite 250
Las Vegas, Nevada 89144
pbrown@bremerwhyte.com

FRANCIS I. LYNCH, ESQ.
CHARLES "DEE" HOPPER, ESQ.
SERGIO SALZANO, ESQ.
LYNTH HOPPER, LLP
1210 South Valley View Boulevard, Suite 208
Las Vegas, Nevada 89102

SCOTT WILLIAMS
WILLIAMS & GUMBINER, LLP
100 Drakes Landing Road, Suite 260
Greenbrae, California 94904

MICHAEL J. GAYAN, ESQ.
WILLIAM L. COULTHARD, ESQ.
KEMP JONES & COULTHARD
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
m.gayan@kempjones.com



Laura Banks, Judicial Executive Assistant

File Into Existing Case

Case Number	Location	Name	Description	Case Type	Email
A-16-744146-D	Department 22	Laurent Hallier, Plaintiff(s...	Chapter 40		
1	20	Party: Laurent Hallier - Plaintiff			
		Party: Panorama Towers Condominium Unit Owners Association - Defendant			
		Angela Embrey			a.embrey@kempjones.com
		Michael J. Gayan			m.gayan@kempjones.com
		Nicole McLeod			n.mcleod@kempjones.com
		Patricia Ann Pierson			p.pierson@kempjones.com
		Party: Laurent Hallier - Counter Defendant			
		Party: Panorama Towers I LLC - Plaintiff			
		Party: Panorama Towers I LLC - Counter Defendant			
		Party: Panorama Towers I Mezz LLC - Plaintiff			
		Party: Panorama Towers I Mezz LLC - Counter Defendant			
		Party: MJ Dean Construction Inc - Plaintiff			
		Party: MJ Dean Construction Inc - Counter Defendant			
		Party: Panorama Towers Condominium Unit Owners Association - Counter Claimant			
		1	2	3	10 items per page

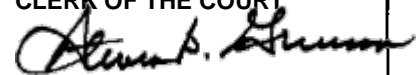
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File Into Existing Case

Case Number	Location	Name	Description	Case Type	Email																																																						
A-16-744146-D	Department 22	Laurent Hallier, Plaintiff(s)...	Chapter 40																																																								
1	20	<p>► Party: Southern Nevada Paving Inc - Counter Defendant</p> <p>► Party: Insulpro Inc - Counter Defendant</p> <p>▼ Other Service Contacts</p> <table border="1"> <tbody> <tr><td>"Charles ""Dee"" Hopper, Esq. "</td><td>CDHopper@lynchhopper.com</td></tr> <tr><td>"Francis I. Lynch, Esq. "</td><td>FLynch@lynchhopper.com</td></tr> <tr><td>Ben Ross .</td><td>Ben@litigationservices.com</td></tr> <tr><td>Calendar .</td><td>calendar@litigationservices.com</td></tr> <tr><td>Colin Hughes .</td><td>colin@lynchhopper.com</td></tr> <tr><td>Crystal Williams .</td><td>cwilliams@bremerwhyte.com</td></tr> <tr><td>Darlene Cartier .</td><td>dcartier@bremerwhyte.com</td></tr> <tr><td>Debbie Holloman .</td><td>dholloman@jamsadr.com</td></tr> <tr><td>Depository .</td><td>Depository@litigationservices.com</td></tr> <tr><td>Floyd Hale .</td><td>fhale@floydhale.com</td></tr> <tr><td>Jennifer Juarez .</td><td>jjuarez@lynchhopper.com</td></tr> <tr><td>Peter C. Brown .</td><td>pbrown@bremerwhyte.com</td></tr> <tr><td>Rachel Bounds .</td><td>rbounds@bremerwhyte.com</td></tr> <tr><td>Scott Williams .</td><td>swilliams@williamsgumbiner.com</td></tr> <tr><td>Shauna Hughes .</td><td>shughes@lynchhopper.com</td></tr> <tr><td>Terri Scott .</td><td>tscott@fmglegal.com</td></tr> <tr><td>Vicki Federoff .</td><td>vicki@williamsgumbiner.com</td></tr> <tr><td>Wendy Jensen .</td><td>wjensen@williamsgumbiner.com</td></tr> <tr><td>Kimberley Chapman</td><td>kchapman@bremerwhyte.com</td></tr> <tr><td>Christie Cyr</td><td>ccyr@leachjohnson.com</td></tr> <tr><td>Devin R. Gifford</td><td>dgifford@bremerwhyte.com</td></tr> <tr><td>Terry Kelly-Lamb</td><td>tkelly-lamb@kringandchung.com</td></tr> <tr><td>Nancy Ray</td><td>nray@kringandchung.com</td></tr> <tr><td>Alondra A Reynolds</td><td>areynolds@bremerwhyte.com</td></tr> <tr><td>Jeff W. Saab</td><td>jsaab@bremerwhyte.com</td></tr> <tr><td>Robert L. Thompson</td><td>rthompson@kringandchung.com</td></tr> <tr><td>Jennifer Vela</td><td>Jvela@bremerwhyte.com</td></tr> </tbody> </table>				"Charles ""Dee"" Hopper, Esq. "	CDHopper@lynchhopper.com	"Francis I. Lynch, Esq. "	FLynch@lynchhopper.com	Ben Ross .	Ben@litigationservices.com	Calendar .	calendar@litigationservices.com	Colin Hughes .	colin@lynchhopper.com	Crystal Williams .	cwilliams@bremerwhyte.com	Darlene Cartier .	dcartier@bremerwhyte.com	Debbie Holloman .	dholloman@jamsadr.com	Depository .	Depository@litigationservices.com	Floyd Hale .	fhale@floydhale.com	Jennifer Juarez .	jjuarez@lynchhopper.com	Peter C. Brown .	pbrown@bremerwhyte.com	Rachel Bounds .	rbounds@bremerwhyte.com	Scott Williams .	swilliams@williamsgumbiner.com	Shauna Hughes .	shughes@lynchhopper.com	Terri Scott .	tscott@fmglegal.com	Vicki Federoff .	vicki@williamsgumbiner.com	Wendy Jensen .	wjensen@williamsgumbiner.com	Kimberley Chapman	kchapman@bremerwhyte.com	Christie Cyr	ccyr@leachjohnson.com	Devin R. Gifford	dgifford@bremerwhyte.com	Terry Kelly-Lamb	tkelly-lamb@kringandchung.com	Nancy Ray	nray@kringandchung.com	Alondra A Reynolds	areynolds@bremerwhyte.com	Jeff W. Saab	jsaab@bremerwhyte.com	Robert L. Thompson	rthompson@kringandchung.com	Jennifer Vela	Jvela@bremerwhyte.com
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EXHIBIT "C"



FFCO

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Case No. A-16-744146-D

Dept. No. XXII

**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.

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

**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.

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

5 Third-Party Plaintiff,

6 Vs.

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

19 Third-Party Defendants.¹

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

21 This matter, concerning Plaintiffs'/Counter-Defendants' Motion for Summary Judgment on
22 Defendants'/Counter-Claimants' Counter-Claim, and Motion for Partial Summary Judgment on the
23 Third-Claim for Relief contained in Plaintiffs'/Counter-Defendants' Complaint for Declaratory
24 Relief filed March 20, 2017, came on for hearing on the 20th day of June 2017 at the hour of 10:30
25 a.m. before Department XXII of the Eighth Judicial District Court, in and for Clark County, Nevada,
26 with JUDGE SUSAN H. JOHNSON presiding; Plaintiffs/Counter-Defendants appeared by and
27 through their attorneys, PETER C. BROWN, ESQ. and JEFFREY W. SAAB, ESQ. of the law firm,
28 BREMER WHYTE BROWN & O'MEARA; and Defendants/Counter-Claimants/Third-Party
Plaintiffs appeared by and through their attorneys, SERGIO SALZANO, ESQ., CHARLES "DEE"

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

1 HOPPER, ESQ. and FRANCIS I. LYNCH, ESQ. of the law firm, LYNCH HOPPER. Having
2 reviewed the papers and pleadings on file herein, heard oral arguments of the lawyers and taken this
3 matter under advisement, this Court makes the following Findings of Fact and Conclusions of Law:

4 **FINDINGS OF FACT AND PROCEDURAL HISTORY**

5 1. This case arises as a result of alleged constructional defects within both the common
6 areas and the 616 residential condominium units located within two tower structures of the
7 PANORAMA TOWERS located at 4525 and 4575 Dean Martin Drive in Las Vegas, Nevada.²

8 2. On February 24, 2016, Defendant/Counter-Claimant PANORAMA TOWERS
9 CONDOMINIUM UNIT OWNERS' ASSOCIATION served its NRS 40.645 Notice of
10 Constructional Defects upon Plaintiffs/Counter-Defendants (also identified herein as the
11 "Contractors" or "Builders"), identifying the following deficiencies:
12

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

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

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

28 ...

²According to Plaintiffs, 4525 Dean Martin Drive or "Tower I" consists of 33 floors, 308 units, 10 townhomes, 6 lofts, retail space, pool and a 5-level parking garage. 4575 Dean Martin Drive or "Tower II" has 34 floors, 308 units, 10 townhomes, 6 lofts, retail space, pool and a 5-level parking garage. See Plaintiffs'/Counter-Defendants' Motion for Summary Judgment on Defendant's/Counter-Claimant's Counter-Claim, and their Motion for Partial Summary Judgment on Third-Claim for Relief within the Complaint for Declaratory Relief filed March 20, 2017, p. 7.

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

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

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

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

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

20 3. The Contractors elected to inspect the constructional defects identified within the
21 Association's NRS 40.645 Notice on March 24, 2016.⁴ During the inspection, the Contractors
22 observed windows located in Unit 300 had been already been removed and replaced. Likewise,
23 prior to the Contractors' inspection, the majority of the alleged corroded mechanical room piping, as
24 well as the averred defective sewer piping had also been removed, replaced and/or repaired. The
25 Contractors were not provided notice of the removal or replacement of the alleged constructional
26 defective windows in Unit 300 or the deficient piping in the mechanical room prior to the March 24,
27 2016 inspection.

28 ...

³See Exhibit 1 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's Counter-Claim, and Motion for Partial Summary Judgment on the Third Claim for
Relief of the Complaint for Declaratory Relief filed March 20, 2017.

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

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

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

15 6. Contractors filed their Complaint on September 28, 2016 against the Owners'
16 Association, asserting the following claims:

- 17 1. Declaratory Relief—Application of AB 125;
- 18 2. Declaratory Relief—Claim Preclusion;
- 19 3. Failure to Comply with NRS 40.600, *et seq.*;
- 20 4. Suppression of Evidence/Spoliation;
- 21 5. Breach of Contract (Settlement Agreement in Prior Litigation);
- 22 6. Declaratory Relief—Duty to Defend; and
- 23 7. Declaratory Relief—Duty to Indemnify.

25
26 ⁵See Exhibit 2 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
27 Defendant's/Counter-Claimant's Counter-Claim, and Motion for Partial Summary Judgment on the Third Claim for
28 Relief of the Complaint for Declaratory Relief.

⁶See Exhibit 3 attached to Plaintiffs'/Counter-Defendants Motion for Summary Judgment on
Defendant's/Counter-Claimant's Counter-Claim, and Motion for Partial Summary Judgment on the Third Claim for
Relief of the Complaint for Declaratory Relief.

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

- 3 1. Breach of NRS 116.4113 and 116.4114 Express and Implied Warranties; as
4 well as those of Habitability, Fitness, Quality and Workmanship;
5 2. Negligence and Negligence *Per Se*;
6 3. Products Liability (against the manufacturers);
7 4. Breach of (Sales) Contract;
8 5. Intentional/Negligent Disclosure; and
9 6. Duty of Good Faith and Fair Dealing; Violation of NRS 116.1113.
10

11 8. The Contractors now move this Court for summary judgment, or dismissal of the
12 Counter-Claim upon the bases:

13 (1) the Association failed to comply with NRS 40.645(2)(b) by not
14

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

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

18 (c) providing verification from each owner the defect exists in his unit, and
19

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

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

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

24 9. The Owners' Association opposes, arguing its NRS 40.645 notice is presumed to be
25 valid, and further, the notice statutes are meant to require substantial as opposed to technical or strict
26 compliance. Further, the Contractors' interpretation of AB 125 is not reasonable, leads to absurd
27 results and violates due process. Notwithstanding these arguments, if this Court found the notice to
28

1 be deficient, the appropriate remedy would be to stay the case and provide curative instructions, as
2 opposed to dismissal of the Counter-Claim. *See* NRS 40.647(2)(b).

3 CONCLUSIONS OF LAW

4 1. Summary judgment is appropriate and “shall be rendered forthwith” when the
5 pleadings and other evidence on file demonstrates no “genuine issue as to any material fact
6 [remains] and that the moving party is entitled to a judgment as a matter of law.” *See* NRCP 56(c);
7 Wood v. Safeway, Inc., 121 Nev. 724, 729, 121 P.3d 1026 (2005). The substantive law controls
8 which factual disputes are material and will preclude summary judgment; other factual disputes are
9 irrelevant. *Id.*, 121 Nev. at 731. A factual dispute is genuine when the evidence is such that a
10 rational trier of fact could return a verdict for the non-moving party. *Id.*

11
12 2. While the pleadings and other proof must be construed in a light most favorable to
13 the non-moving party, that party bears the burden “to do more than simply show that there is some
14 metaphysical doubt” as to the operative facts in order to avoid summary judgment being entered in
15 the moving party’s favor. Matsushita Electric Industrial Co. v. Zenith Radio, 475, 574, 586 (1986),
16 *cited by* Wood, 121 Nev. at 732. The non-moving party “must, by affidavit or otherwise, set forth
17 specific facts demonstrating the evidence of a genuine issue for trial or have summary judgment
18 entered against him.” Bulbman, Inc. v. Nevada Bell, 108 Nev. 105, 110, 825 P.2d 588, 591 (1992),
19 *cited by* Wood, 121 Nev. at 732. The non-moving party “is not entitled to build a case on the
20 gossamer threads of whimsy, speculation, and conjecture.” Bulbman, 108 Nev. at 110, 825 P.2d
21 591, *quoting* Collins v. Union Fed. Savings & Loan, 99 Nev. 284, 302, 662 P.2d 610, 621 (1983).

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

23
24 3. There is no question the provisions of NRS 40.600 to 40.695 were enacted by the
25 Nevada Legislature with the intent to provide contractors an opportunity to repair constructional
26 defects and avoid litigation. *See* D.R. Horton, Inc. v. District Court, 123 Nev. 468, 476, 168 P.3d
27
28

1 731 (2007).⁷ To ensure contractors were given an opportunity to repair, the Nevada Legislature
2 required a homeowner or claimant to give the contractor notice of constructional defects initially in
3 "reasonable detail,"⁸ and based upon that notice, allow the contractor time and opportunity to inspect
4 and make repairs when a deficiency was verified.⁹ A claimant's failure to comply with those
5 requirements before filing a constructional defect action results in the dismissal or postponement of
6 that action until those mandates are complied.¹⁰

7
8 4. In 2015, approximately one year before PANORAMA TOWERS CONDOMINIUM
9 UNIT OWNERS' ASSOCIATION served its notice of constructional deficiencies in this case, the
10 Nevada Legislature made sweeping revisions to the state's laws relating to constructional defects
11 with the enactment of Assembly Bill (AB) 125. Of significance here, AB 125 amended provisions
12 governing the information required to be provided within a notice of constructional defects. It
13 revised the statutes of repose regarding actions for damages resulting from certain deficiencies in
14 construction. Further, it prohibited a homeowners' association from pursuing an action for
15 constructional defects unless the litigation pertained exclusively to the association's common
16 elements.
17

18 5. As alluded to above, NRS 40.645(2), as revised in AB 125, sets forth more stringent
19 requirements for the constructional defect notice than what was in place prior to February 25, 2015.
20 It now provides:
21

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

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

25 (b) Identify in *specific* detail each defect, damage and injury to each
26 residence or appurtenance that is the subject of the claim including, without

27 ⁷This case is commonly referred to as "*First Light I*" by practicing lawyers and judges.

28 ⁸See 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."

⁹See NRS 40.647(1).

¹⁰See NRS 40.647(2).

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)

6. While NRS 40.645 was revised to include more stringent requirements within the pre-litigation notice to contractors, this Court notes 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 reasonableness¹¹ 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."

7. 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:

After notice of a constructional defect is given pursuant to NRS 40.645, before a claimant may commence an action or amend a claim to add a cause of action for a constructional defect against a contractor, subcontractor, supplier or design professional, the claimant must:

(a) Allow an inspection of the alleged constructional defect to be conducted pursuant to NRS 40.6462;

(b) Be present at an inspection conducted pursuant to NRS 40.6462 and identify the exact location of each alleged constructional defect specified in the notice

¹¹The Nevada Supreme Court's decision in D.R. Horton, Inc., pre-dates the enactment of AB 125, which includes the amendment to NRS 40.645(2). This Court presumes, if presented the same issues today, the high court's interpretation would have indicated the district courts have wide discretion to consider the contractor's challenge to the "specificity," rather than "reasonableness" of the pre-litigation notice.

1 and, if the notice includes an expert opinion concerning the alleged constructional
2 defect, the expert, or a representative of the expert who has knowledge of the alleged
3 constructional defect, must also be present at the inspection and identify the exact
4 location of each alleged constructional defect for which the expert provided an
5 opinion; and

6 (c) Allow the contractor, subcontractor, supplier or design professional a
7 reasonable opportunity to repair the constructional defect or cause the defect to be
8 repaired if an election to repair is made pursuant to NRS 40.6472.

9 8. If the claimant commences an action without complying with NRS 40.647(1) or NRS
10 40.645, the court shall:

11 (a) Dismiss the action without prejudice and compel the claimant to comply with
12 those provisions before filing another action; or

13 (b) If dismissal of the action would prevent the claimant from filing another action
14 because the action would be procedurally barred by the statute of limitations or statute of
15 repose, the court shall stay the proceeding pending compliance with those provisions by the
16 claimant.

17 NRS 40.647(2)(b); also see D.R. Horton, Inc. v. District Court, 131 Nev.Ad.Op. 86, 358 P.3d 925
18 (2015) [district court did not abuse its discretion in granting an *ex parte* stay under NRS
19 40.647(2)(b) permitting a homeowners' association to complete the NRS Chapter 40 process and in
20 denying a motion to dismiss the underlying breach of warranty complaint pursuant to the five-year
21 rule in NRCP 41(e)].

22 9. When a defect exists that creates imminent threat to health or safety, NRS 40.670 sets
23 forth the parties' duties and rights to cure the deficiency; this statute specifically states:

24 1. A contractor, subcontractor, supplier or design professional who receives
25 written notice of a constructional defect resulting from work performed by the contractor,
26 subcontractor, supplier or design professional which creates an imminent threat to the health
27 or safety of the inhabitants of the residence shall take reasonable steps to cure the defect as
28 soon as practicable. The contractor, subcontractor, supplier or design professional shall not
cure the defect by making any repairs for which such person is not licensed or by causing
any repairs to be made by a person who is not licensed to make those repairs. If the
contractor, subcontractor, supplier or design professional fails to cure the defect in a
reasonable time, the owner of the residence may have the defect cured and may recover from
the contractor, subcontractor, supplier or design professional the reasonable cost of the
repairs plus reasonable attorney's fees and costs in addition to other damages recoverable by
any other law.

...

1 2. A contractor, subcontractor, supplier or design professional who does not cure
2 a defect pursuant to this section because such person has determined, in good faith and after
3 reasonable inspection, that there is not an imminent threat to the health or safety of the
4 inhabitants is not liable for attorney's fees and costs pursuant to this section, except that if a
5 building inspector, building official or other similar authority employed by a governmental
6 body with jurisdiction certifies that there is an imminent threat to the health and safety of the
7 inhabitants of the residence, the contractor, subcontractor, supplier or design profession is
8 subject to the provisions of subsection 1.

9 10. As noted above, the Contractors move for summary judgment or dismissal of the
10 homeowners' association's counter-claim, as well as partial summary judgment of their Third Claim
11 for Relief in the primary action, *inter alia*, upon the following bases:

12 (1) the homeowners' association failed to comply with NRS 40.645(2)(b) by not:

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

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

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

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

18 (2) the homeowners' association failed to provide notice of defects prior to performing
19 repairs.

20 This Court addresses the Contractors' challenge to the validity of the NRS 40.645 notice
21 with respect to each of the four identified constructional defects below.

22 a. **Residential tower windows:** As noted above, within the NRS 40.645 notice, the
23 Association claims there is a constructional defective design of 100 percent of "[t]he window
24 assemblies in the [616] residential tower units" as water entering these mechanisms has no
25 appropriate means of draining or exiting these fabrications. The Association states "there are no sill
26 pans, proper weepage components or other drainage provisions designed to direct water from and
27 through the window assemblies to the interior of the building." Because of this deficient design,
28

1 “water that should have drained to the exterior of the building has been entering into the metal
2 framing components of the exterior wall and floor assemblies, including the curb walls that support
3 the windows, and is causing corrosion damage to the metal parts and components within these
4 assemblies. Further, this damage to the metal components of the tower structures presents an
5 unreasonable risk of injury to a person or property resulting from the degradation of these structural
6 assemblies.” The Contractors argue such descriptions set forth in the NRS 40.645 notice do not
7 provide the “specific detail” of each defect, damage and injury that is the subject of the claim
8 including, without limitation, their exact location. In this regard, the Contractors note there are in
9 excess of 9,500 windows within the two residential towers, and these windows and their assemblies
10 are of various types, sizes and locations.
11

12 As noted above, NRS 40.645 now requires not just *reasonable*, but *specific* detail of *each*
13 defect, damage and injury. As there are in excess of 9,500 windows and assemblies of various
14 types, sizes and locations, NRS 40.645 requires *each* defect, damage and injury to be detailed
15 specifically within the pre-litigation notice. In this case, the notice does not discuss the method or
16 extent of the Association’s inspection of and its findings in the over 9,500 window assemblies which
17 varies in type, size and location.¹² For these reasons, this Court concludes the portion of the NRS
18 40.645 notice, which outlines the existence of the same or similar deficiencies in over 9,500 window
19 assemblies, is not sufficient.
20
21

22 **b. Residential tower fire blocking:** The NRS 40.645 notice indicates there is no fire
23 blocking insulation within the ledger shelf cavities, steel stud framing hollow spaces or both at the
24 exterior wall locations between the residential floors although such installation was required in the
25 building plans. According to the Association, this deficiency exists in 100 percent of the residential
26

27 ¹²This Court assumes the defective window assemblies in question are located exclusive within the
28 association’s common elements. If they are not, the affected unit owner must also verify, under penalties of perjury, the
particular constructional defect exists within the residence or appurtenance owned by him or her. See NRS 40.645(2)(d).

1 tower units, and presents an unreasonable risk of injury in the event of fire. The Contractors argue
2 such statement does not specifically detail the location of each defect, damage or injury.

3 The NRS 40.645 notice identifies the particular constructional deficiency, but it is not
4 specific in terms of each defect's location. Notably, the notice states "...the insulation was omitted
5 either from the ledger shelf cavity, from the steel stud framing cavity, *or* from both." (Emphasis
6 added) The "specific detail" requirement of NRS 40.645 necessitates the exact location of the defect
7 in each unit, whether it be within the ledger shelf cavity, the steel stud framing hollow space, or in
8 both areas. Further, the notice does not indicate the method or extent of the inspection, or
9 specifically, how the homeowners' association knows this particular "installation deficiency" exists
10 in all or 100 percent of all the residential tower units.¹³ For these reasons, this Court concludes the
11 portion of the NRS 40.645 notice, which addresses the lack of fire blocking insulation, is not
12 sufficient.
13

14
15 c. **Mechanical Room Piping:** The NRS 40.645 notice states the piping in the two
16 lower and two upper mechanical rooms in the towers "has sustained corrosion damage as described
17 in the attached ATMG report dated November 17, 2011." Given the reference, this Court
18 incorporates the information within the ATMG report within the NRS 40.645 notice. The report
19 contains a spreadsheet, along with photographs of the particular parts that need to be replaced and
20 when. However, this Court could not discern whether replacement of certain parts, such as "inlet
21 carbon steel nipple "steel nipple," or the "ferrous pump bowl assembly," which needed to be
22 replaced either "now" or in "1 – 5 years," was required because of defects in construction or as a
23 result of normal wear and tear. This Court also could not determine whether the "welded joints of
24 the stainless steel piping" exhibiting leaks was due to constructional defects or normal wear and tear.
25
26

27 ¹³If this defect "exists in all (100%) of the residential tower units," one may question the standing of the
28 Association to make such claims. If such claim for constructional defect is located within the residence, the homeowner
is the real party in interest and must also verify the deficiency exists in his or her unit. See NRS 40.645(2)(d).

1 The report did indicate constructional defects with respect to "numerous" small fittings and valves
2 made of yellow brass which are experiencing dezincification, presumably at the locations identified
3 in the spreadsheet. There were "problems" discussed with the "bolting," and particularly the finding
4 of "mixed bolting in several flanged connections and bolts holding butterfly valves in position," but
5 unfortunately, these items were not listed in the spreadsheets, and the number and types of such
6 defects and their locations were not identified. For these reasons, this Court concludes the portion of
7 the NRS 40.645 notice, which addresses the mechanical room piping, is not sufficient.
8

9 d. **Sewer problem:** The NRS 40.645 notice stated "[t]he main sewer line connecting
10 the Development to the city sewer system ruptured due to installation error during construction,
11 causing physical damage to the adjacent areas. This deficiency has been repaired. In addition to
12 causing damage, the defective installation presented an unreasonable risk of injury to a person or
13 property resulting from the disbursement of unsanitary matter." Such notice does not specify the
14 "installation error made" or what physical damage occurred. For this reason, this Court concludes
15 this portion of the NRS 40.645 notice, addressing the sewer problem, is not sufficient.
16

17 In summary, following the requirements set forth in the newly-amended NRS 40.645, this
18 Court concludes the Contractors met their burden to demonstrate Association's pre-litigation notice
19 addressing all four constructional defects is deficient, and thus, they overcome the presumption of
20 the notice's validity.
21

22 11. While it has not proposed the newly amended statutes or AB 125 are ambiguous, the
23 Association has argued the Contractors' challenge to the validity of its NRS 40.645 notice is based
24 solely upon their interpretation of AB 125 which it believes is unreasonable, leads to an absurd
25 result and violates its due process rights.¹⁴ In this regard, the Association argues, "[t]he costs
26

27
28 ¹⁴The Association did not set forth how the Contractors' interpretation of AB 125 violates its due process rights,
and it provided no authority in support of its position.

1 associated with the inspection and destructive testing for **each and every** occurrence of the defects
2 is prohibitive.”¹⁵ The Association proposes NRS Chapter 40 requires notice to identify the specific
3 defect, including its location, within a “typical unit,” but it does not require every defect to be
4 specifically located within “each and every unit.”

5 In this case, the Court disagrees with the Association’s assessment for several reasons. *First*,
6 nowhere within NRS 40.645 did the 2015 Nevada Legislature include the words “typical unit.” The
7 AB 125 amendment unambiguously states the NRS 40.645 notice “must” “[i]dentify in *specific*
8 detail *each* defect, damage and injury to *each* residence or appurtenance that is the subject of the
9 claim including, without limitation, the *exact location* of each such defect, damage and injury.”
10 (Emphasis added) Clearly, the Legislature intended the defect and its exact location to be
11 specifically identified to allow the contractor to make a meaningful investigation. If the 2015
12 Nevada Legislature intended constructional defects found in a “typical unit” be extrapolated as
13 existing in other residences, it would have said so. Instead, by deleting such provisions from the
14 pre-2015 NRS 40.645, the lawmakers demonstrated their intent extrapolation was no longer an
15 acceptable practice. *Second*, requiring each defect, damage and injury to each residence to be
16 specifically identified does not necessarily lead to absurd results, incurrence of prohibitive costs or
17 require destructive testing. Such is especially true when one claims the deficiency is in the design of
18 the windows and their assemblies as the Association does here. For example, if there is a defect in
19 the unit’s design, the Association or other claimant can identify the exact location by use of the
20 building blueprints or plans.¹⁶ Defects in the window assembly’s design can be discerned through
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25 ¹⁵See the Association’s Opposition to Motion for Summary Judgment on the Counter-Claim and motion for
26 Partial Summary Judgment on Plaintiffs’/Counter-Defendants’ Third Claim for Relief in their Complaint for Declaratory
27 Relief, p. 14. (Emphasis in original)

28 ¹⁶Again, it is not clear whether these window assemblies are located within the individual units or common
area. If the window assemblies are located within the individual units, the Association does not have standing to bring
claims for constructional defects within the residences. Further, the individual unit owner must provide a signed
statement, verifying the defect exists within his residence.

1 the manufacturer's plans, sketches or diagrams. Further, according to the Association, leaks and
2 corrosion in the mechanical room piping or ruptures in the sewer system allegedly caused by
3 constructional defects were readily apparent, meaning one did not need to destructively test to find
4 them. Notwithstanding such premise, any destructive testing by the Association either was or could
5 have been conducted contemporaneously with the repair and/or replacement of the plumbing
6 systems.

7
8 12. The Contractors also argue the homeowners association did not comply with the NRS
9 Chapter 40 process in other respects, and, notably, for not arranging for its representative or expert
10 to be present at their inspection, which took place March 24, 2016. As discussed above, NRS
11 40.647(1) specifically requires the claimant not only allow an inspection but be present and "identify
12 the exact location of each alleged constructional defect specified in the notice." Further, if the notice
13 included an expert opinion, that expert or his representative, who has knowledge of the alleged
14 defect must also be present and identify the exact location of each constructional defect. The
15 homeowners' association does not dispute the Contractors' position. It had no representative or
16 expert present at the March 24, 2016 inspection.

17
18 13. Further, the contractor must be allowed a reasonable opportunity either to repair the
19 defect or cause the deficiency to be repaired if an election to repair is made pursuant to NRS
20 40.6472. In this case, the Contractors were not accorded its right to inspect and repair the defects in
21 the mechanical room and sewer system, as the deficiencies were removed and replaced prior to the
22 March 26, 2016 inspection. This Court understands, to this day, the Contractors have not been
23 provided access to the defective piping, fittings and other materials. Given these facts, this Court
24 finds the Contractors' arguments the Association did not comply with NRS Chapter 40's pre-
25 litigation requirements have credence.

26 ...
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28

1 14. This Court also does not find the Association's conduct in making repairs and
2 disposing of defective material to be excused by NRS 40.670. NRS 40.670 requires written notice
3 be made to the contractor, subcontractor, supplier or design professional of the constructional defect
4 that is creating an imminent threat to health and safety. Upon receiving such notice, the contractor,
5 subcontractor, supplier or design professional must take reasonable steps to cure the defect as soon
6 as practicable. In this case, repairs were made prior to the Contractors receiving the NRS 40.645
7 notice. Further, this Court questions whether there was an imminent threat to health and safety when
8 the defects to the mechanical room were based, at least in part, upon a 2011 expert report.
9

10 15. The Association argues, *even if* its compliance with NRS Chapter 40 was found
11 deficient, NRS 40.647(2)(b) requires this Court to stay the proceedings pending compliance with the
12 pre-litigation process as dismissal of the action would prevent it from filing another. This Court
13 finds the Association's position persuasive. Clearly, if this Court dismisses the Counter-Claim, the
14 Association would be prevented from filing another action. For this reason, excepting the matter
15 discussed below, this Court stays the proceeding pending compliance.
16

17 **Statute of Limitation re: Mechanical room piping**

18 16. Statutes of limitation foreclose lawsuits after a fixed period of time following
19 occurrence or discovery of an injury. *See Alenz v. Twin Lakes Village*, 108 Nev. 1117, 1120, 832
20 P.2d 834, 836 (1993), *citing Allstate Insurance Co. v. Furgerson*, 104 Nev. 772, 775 n.2, 766 P.2d
21 904, 906 n.2 (1988). NRS Chapter 11, which identifies various limiting periods, does not set forth a
22 specific statute of limitations dealing with the discovery of constructional defects located within a
23 residence or appurtenance thereto. However, the Nevada Supreme Court has held these types of
24 claims are subject to the "catch all" statute, NRS 11.202. *See Hartford Insurance Group v. Statewide*
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1 Appliances, Inc., 87 Nev. 195, 198, 484 P.2d 569, 571 (1971).¹⁷ This statute specifically provides
2 “[a]n action for relief, not hereinbefore provided for, must be commenced within 4 years after the
3 cause of action shall have accrued.”

4 17. The four-year limitations period identified in NRS 11.220 begins to run at the time
5 the plaintiff learns, or in the exercise of reasonable diligence should have learned of the harm to the
6 property caused by the constructional defect. Tahoe Village Homeowners Association v. Douglas
7 County, 106 Nev. 660, 662-663, 799 P.2d 556, 558 (1990), *citing* Oak Grove Investment v. Bell &
8 Gossett Co., 99 Nev. 616, 621-623, 669 P.2d 1075, 1078-1079 (1983); *also see* G and H Associates
9 v. Earnest W. Hahn, Inc., 113 Nev. 265, 272, 934 P.2d 229, 233, *citing* Nevada State Bank v.
10 Jamison Partnership, 106 Nev. 792, 800, 801 P.2d 1377, 1383 (1990) (statutes of limitation are
11 procedural bars to a plaintiff’s action; the time limits do not commence and the cause of action does
12 not accrue until the aggrieved party knew or reasonable should have known of the facts giving rise
13 to the damage or injury); Beazer Homes Nevada, Inc. v. District Court, 120 Nev. 575, 587, 997 P.3d
14 1132, 1139 (2004) (“For constructional defect cases the statute of limitations does not begin to run
15 until ‘the time the plaintiff learns, or in the exercise of reasonable diligence should have learned, of
16 the harm to the property.’”).

17 18. In this case, the Association learned of the constructional defects existing in the
18 towers’ mechanical rooms, at the latest, on or about November 17, 2011, the date of the ATMG
19 report. Therefore, Association’s action based upon constructional defects located in the mechanical
20 rooms commenced and accrued November 17, 2011. The Association had up to four (4) years in
21 which to serve its NRS 40.645 notice. The notice was not served until February 24, 2016, which is
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26 ¹⁷In Hartford Insurance Group, an action was brought for damages to a home caused by an explosion of a
27 heater made for use with natural as opposed to propane gas. The high court held such matter was not an “action for
28 waste or trespass to real property” subject to a three-year statute of limitation nor was it an “action upon a contract...not
founded upon an instrument in writing” even though plaintiff sued under a theory of breach of express and implied
warranties. See NRS 11.190. This action fell into the “catch all” section, i.e. NRS 11.220, the statute of limitations of
four (4) years.

1 outside the four-year period. As a consequence, this Court concludes the Association's claims as
2 they are based upon constructional defects located in the mechanical rooms are time-barred pursuant
3 to NRS 11.202. This Court, therefore, grants summary judgment in favor of the Contractors with
4 respect to the mechanical room constructional defect claims.

5 Accordingly, based upon the foregoing Findings of Fact and Conclusions of Law,

6 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** Plaintiffs'/Counter-
7 Defendants' Motion for Summary Judgment on Defendants'/Counter-Claimants' Counter-Claim,
8 and Motion for Partial Summary Judgment on the Third-Claim for Relief contained in
9 Plaintiffs'/Counter-Defendants' Complaint for Declaratory Relief filed March 20, 2017 is granted in
10 part, denied in part *without prejudice*, as set forth in more detail below;
11

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court finds and
13 concludes the NRS 40.645 Notice of Constructional Defects served upon Plaintiffs/Counter-
14 Defendants is deficient, and Plaintiffs/Counter-Defendants have met their burden of overcoming the
15 presumption of the notice's validity. However, this Court declines to dismiss Defendant's/Counter-
16 Claimant's Counter-Claim pursuant to NRS 40.647(2)(a) as such would prevent the Association
17 from filing another action. This Court, therefore, stays the proceedings with respect to the
18 constructional defects relating to window assemblies, fire blocking and sewer problems for a period
19 of six (6) months or until **March 15, 2018 at 10:30 a.m.**, at which time this Court schedules a
20 hearing to check the status of this matter; and
21

22 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** there remains no genuine
23 issue of material fact concerning the time-barring effect of the four-year statute of limitations, and
24

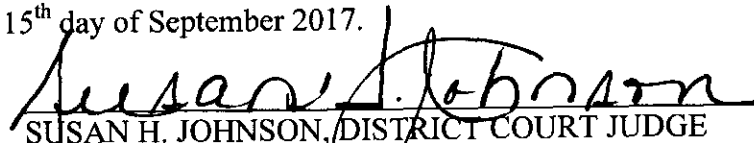
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1 thus, Defendant's/Counter-Claimant's claims for constructional defects located in the mechanical
2 rooms are dismissed pursuant to NRS 11.202.

3 DATED this 15th day of September 2017.

4 
5 SUSAN H. JOHNSON, DISTRICT COURT JUDGE

6 **CERTIFICATE OF SERVICE**

7 I hereby certify, on the 15th day of September 2017, I electronically served (E-served), placed
8 within the attorneys' folders located on the first floor of the Regional Justice Center or mailed a true
9 and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER
10 to the following counsel of record, and that first-class postage was fully prepaid thereon:
11

12 PETER C. BROWN, ESQ.
13 BREMER WHYTE BROWN & O'MEARA, LLP
14 1160 North Town Center Drive, Suite 250
15 Las Vegas, Nevada 89144
16 pbrown@bremerwhyte.com

17 FRANCIS I. LYNCH, ESQ.
18 CHARLES "DEE" HOPPER, ESQ.
19 SERGIO SALZANO, ESQ.
20 LYNTH HOPPER, LLP
21 1210 South Valley View Boulevard, Suite 208
22 Las Vegas, Nevada 89102

23 SCOTT WILLIAMS
24 WILLIAMS & GUMBINER, LLP
25 100 Drakes Landing Road, Suite 260
26 Greenbrae, California 94904

27 
28 Laura Banks, Judicial Executive Assistant

EXHIBIT "D"

BREMER WHYTE**BREMER WHYTE BROWN & O'MEARA LLP**

1160 N. TOWN CENTER DRIVE
SUITE 250
LAS VEGAS, NV 89144
(702) 258-6665
(702) 258-6662 FAX
www.bremerwhyte.com

NICOLE WHYTE^{1,2,6,10,g}
KEITH G. BREMER¹
RAYMOND MEYER, JR.¹
PETER C. BROWN^{1,2,3,10}
JOHN V. O'MEARA^{1,2,4}
KERE K. TICKNER¹
TYLER D. OFFENHAUSER¹
PATRICK AU¹
JEREMY S. JOHNSON¹
JOHN H. TOOHEY^{1,3}
VIK NAGPAL¹
KAREN M. BAYTOSH^{1,2}
MONIQUE R. DONAVAN¹
ARASH S. ARABI¹
LANETTA D.W. RINEHART¹
JOHN J. BELANGER³
PAUL A. ACKER¹
ALISON K. HURLEY¹
LUCIAN J. GRECO, JR.²
ANTHONY T. GARASI²
RACHEL A. MIHAL¹
MICHAEL A. D'ANDREA¹
SHEILA C. STILES¹²

¹ Admitted in California
² Admitted in Nevada
³ Admitted in Arizona
⁴ Admitted in Colorado
⁵ Admitted in Ohio
⁶ Admitted in Washington D.C.
⁷ Admitted in Oregon
⁹ Admitted in Texas
¹⁰ Admitted in Washington
¹¹ Admitted in New Jersey
¹² Admitted in New York
¹³ Admitted in Illinois
¹⁴ Admitted in Utah
¹⁵ Admitted in Pennsylvania
¹⁶ Admitted in New Mexico
^g Certified Family Law Specialist
The State Bar of California Board
of Legal Specialization

RICK L. PETERSON¹
LANCE J. PEDERSEN¹
DANIEL A. CRESPO¹
JOHN C. GOTTLIEB¹
JOHN R. CAYANGYANG¹
ALEXANDER M. GIANNETTO^{1,11,12}
R. TODD WINDISCH¹
TROY A. CLARK²
JEFFREY W. SAAB²
BENJAMIN L. PRICE¹
NICOLE M. SLATTERY^{1,3}
KYLE P. CARROLL¹
BRANDI M. PLANET^{2,4}
PRESCOTT T. JONES²
BRIAN E. CIENIAWSKI^{1,4}
LIZA VELAZCO^{1,2,13}
CARL J. BASILE¹
JONATHAN A. KAPLAN¹
KATHERINE SHRAGER¹
SCOTT W. ULM²
ALEX M. CHAZEN¹
JASON S. DIGIOIA¹
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CAMERON B. GORDON¹
EILEEN J. GAISFORD¹
CHATA N. HOLT²
LINDA T. LAM^{1,2}
DARLENE M. CARTIER²
NICOLE L. SCHMIDT¹
AUGUST B. HOTCHKIN^{1,2}
JARED G. CHRISTENSEN^{2,14}
NICHOLAS C. YOUNG¹
KERRY R. O'BRIEN²
CHRISTOPHER SCHON¹
KENNETH L. MARIBOHO II¹
NICOLE NUZZO¹
JENNA M. WARDEN¹
KEVIN Y. KANOONI¹
LANCE ROGERS¹
PATRICK TAYLOR¹
SARITA PATEL¹

MICHELLE CAMPBELL¹
CHELSIE A. ADAMS²
LAURIE ELZA^{1,9}
CHELSEE M. MONTGOMERY¹
DANIELLE N. LINCORS¹
PAUL A. DELGADILLO¹
JENNIFER YANNI¹
NICHOLAS S. KAM¹
MARISSA C. MARXEN¹
KELLI M. WINKLE-PETTERSON¹
JENNA C. GARZA¹
ROSS A. DILLION¹
DAVID C. LARSEN¹
R. CHRISTOPHER JACKSON¹
NATASHA M. WU¹
MORGAN B. HALLEY^{1,12}
CYNTHIA R. BEEK¹
BRADLEY J. BIGGS^{1,16}
L. WILLIAM LOCKE¹
TIFFANY L. BACON¹
MICAH MTATABIKWA-WALKER²
KEVIN H. PARK^{1,15}
HEATHER L. FRIMMER¹
ERIC B. ALDEN¹
DAVID J. BYASSEE¹
RAYMOND E. ARESHENKO^{1,2}
ALEXANDRA N. IORFINO¹
MERRITT E. COSGROVE¹
TRACEY L. STROMBERG¹
JACQUELENE A. MARCOTT¹
MADELINE M. ARCELLANA¹
LESLEY A. POWERS¹
VICTOR XU¹
HAASTY S. BURNS¹
NORMAN S. FULTON III¹
JASON H. DANG¹
MATTHEW E. PRIMM¹
BRADLEY D. BACE²
PETER M. JAYNES¹
MATTHEW B. MEEHAN³

May 24, 2016

VIA CERTIFIED MAIL RETURN
RECEIPT REQUESTED AND VIA E-MAIL

**INTENDED FOR MEDIATION AND SETTLEMENT PURPOSES ONLY;
THEREFORE, IT IS PROTECTED FROM DISCLOSURE PURSUANT TO NRS 40.680
& NRS 48.105**

CERTIFIED MAIL
#70142120000181142093

Edward Song, Esq.
LEACH JOHNSON SONG & GRUCHOW
8945 W. Russell Road, Ste. 330
Las Vegas, NV 89148
esong@leachjohnson.com

CERTIFIED MAIL
#70142120000181142109

Scott Williams, Esq.
LAW OFFICE OF WILLIAMS &
GUMBINER, LLP
100 Drakes Landing Road, Ste. 260
Greenbrae, CA 94904
swilliams@williamsgumbiner.com

Re: Panorama Towers Condominium Unit Owners' Association v. Panorama Towers I, LLC, Panorama Towers II, LLC and M.J. Dean Construction, Inc.

BWB&O Client: Laurent Hallier aka Laurence Hallier; Panorama Towers I, LLC; Panorama Towers II, LLC; Panorama Towers Mezz I, LLC; Panorama Towers Mezz II, LLC; and M.J. Dean Construction, Inc.

BWB&O File No.: 1287.551

Subject: Panorama Towers Condominium Unit Owners' Association February 24, 2016 Notice to Contractor Pursuant to Nevada Revised Statutes, Section 40.645

CERTIFIED MAIL #70142120000181142093
CERTIFIED MAIL #70142120000181142109
BWB&O File No.: 1287.551
May 24, 2016
Page 2

Dear Mr. Song and Mr. Williams:

Please allow the following correspondence to serve as Laurent Hallier aka Laurence Hallier's; Panorama Towers I, LLC's; Panorama Towers II, LLC's; Panorama Towers Mezz I, LLC; Panorama Towers Mezz II, LLC and M.J. Dean Construction, Inc.'s (collectively "Respondents") Response to the Panorama Towers Condominium Unit Owners' Association's ("Claimant") *Notice to Contractor Pursuant to Nevada Revised Statutes, Section 40.645* ("Chapter 40 Notice") dated February 24, 2016, pursuant to NRS 40.6472.

[REDACTED]

II. OBJECTION TO CLAIMANTS' CHAPTER 40 NOTICE

Claimants' Chapter 40 Notice is procedurally improper and fails to meet the requirements in NRS 40.600 et seq. as amended on February 6, 2015, by AB 125, in terms of both the sufficiency and the timing of the Notice.

A. Claimant's Notice is Deficient

Pursuant to NRS 40.645(3) a Claimant's Notice must:

(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;

(Emphasis added)

These requirements apply to any Chapter Notice given on or after February 6, 2015 (see AB 125, Section 21(3)).

Claimant's Notice fails to comply with NRS 40.645(3) (b) and (c). Claimant Notice does not identify in specific detail, the alleged damage and the exact location of the damage, as it relates to the window, fireblocking and sewer claims.

B. The Statute of Repose Bars all of Claimant's Claims

AB 125, enacted on February 24, 2015, significantly amended Nevada's construction defect statutory scheme as contained in NRS 40.600, et seq. Among other things, AB 125 abolished the previously applicable statutes of limitation and shortened the length of the statute of repose to six years. See AB 125, Section 17, amending NRS 11.202(1) to read:

No action may be commenced against the owner, occupier or any person performing or furnishing the design, planning, supervision or observation of construction, or the construction of an improvement to real property *more than 6 years* after the substantial completion of such an improvement, for the recovery of damages for:

- (a) Any deficiency in the design, planning, supervision or observation of construction or the construction of such an improvement;
- (b) Injury to real or personal property caused by any such deficiency; or
- (c) Injury to or the wrongful death of a person caused by any such deficiency.

(Emphasis added).

The six-year statute of repose applies retroactively to actions in which substantial completion of the improvement to the real property occurred before February 6, 2015 (see AB 125, Section 21(5), and Section 22).

The new six-year statute of repose as contained in AB 125 has a one-year "grace period" to allow a construction defect claim to proceed under the old statute of repose, but only if it "accrued before the effective date of this act [February 24, 2015], and was commenced within 1

Nonetheless, the word “accrues” as set forth in AB 125 does not apply to a statute of limitation or statute of repose. Instead, it must apply to the start of the construction defect claim process via the statutory written notice. Consequently, a claimant must have served written notice pursuant to NRS 40.645 prior to the effective date of the act (February 24, 2015) in order to have the pre-AB 125 version of Chapter 40 apply to the case.

Because AB 125 applies to this litigation, all of the claims in Claimant's Chapter 40 Notice are barred by NRS 11.202's six-year statute of repose. The Clark County, Nevada Building Department issued a Certificate of Occupancy for Tower I (4525 Dean Martin Drive) on January 16, 2008, and for Tower II (4572 Dean Martin Drive) on March 31, 2008. Using the Certificate of Occupancy dates as the dates of substantial completion, the six-year statute of repose would bar any claim that is not brought within six years of January 16, 2008 (Tower I) and March 31, 2008 (Tower II), or by **January 15, 2014** and **March 30, 2014** respectively. Thus, all of Claimant's claims are time barred under NRS 11.202.

[illegible]

IV. RESPONSE TO ALLEGED DEFECTS

In addition to the foregoing, Respondents further respond to Claimant's Chapter 40 Notice as follows:

A. Respondents' Response to Claimant's Alleged Defects Involving Window Assemblies in the Residential Tower Units

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
1	<p>Windows:</p> <p>The window assemblies were defectively designed such that water entering the assemblies does not have appropriate means of exiting the assemblies. There are no sill plans, proper seepage components or other drainage provisions designed to direct water from and through the window assemblies to the exterior of the building.</p> <p>This is design deficiency that exists in all (100%) of the residential tower assemblies.</p>	<p>Respondents disclaim any liability for this alleged defect. This alleged defect is time barred under NRS 11.202(1) and was released as part of the settlement of the prior litigation. In addition, Claimant's Notice fails to comply with NRS 40.645(3) (b) and (c) in that it does not identify in specific detail, the alleged damage and the exact location of the damage relating to this alleged defect. Claimant also failed to provide notice of the alleged defect prior to performing repairs, and Respondents have been denied their statutory right to repair under NRS 40.6472.</p>

CERTIFIED MAIL #70142120000181142093

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BWB&O File No.: 1287.551

May 24, 2016

Page 6

B. Respondents' Response to Claimant's Alleged Defects in the Klai Juba Plan Detail

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
2	<p>Fire Blocking: The plans call 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 unit above or below. However the insulation was not installed as required by the plans and the building code.</p> <p>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.</p> <p>This deficiency presents an unreasonable risk of injury to a person or property resulting from the spread of fire.</p>	Respondents disclaim liability for this alleged defect. This alleged defect is time barred under NRS 11.202(1) and was released as part of the settlement of the prior litigation. In addition, Claimant's Notice fails to comply with NRS 40.645(3) (b) and (c) in that it does not identify in specific detail, the alleged damage and the exact location of the damage relating to this alleged defect.

C. Respondents' Response to Claimant's Alleged Defects Involving the Mechanical Room Piping Asserted in the ATMG Report Dated November 17, 2011

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
3	<p>Mechanical Room Piping: The piping in the two lower and two upper mechanical rooms in the two tower structures has sustained corrosion damage.</p>	Respondents disclaim liability for this alleged defect. This alleged defect is time barred under NRS 11.202(1) and was released as part of the settlement of the prior litigation.

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
		<p>In addition, during Respondents' inspection of the alleged defects, Respondents observed that the majority, if not all, of the alleged corroded pipes had already been replaced. Claimant failed to provide notice of the alleged defect prior to performing this work, and Respondents have been denied their statutory right to repair under NRS 40.6472. According to the report by ATGM attached to Claimant's Chapter 40 Notice, Claimant had knowledge of the alleged defects on or about September 20, 2011 – more than 3 ½ years prior to the date of its Chapter 40 Notice to Respondents.</p> <p>Furthermore, despite Respondents' multiple requests, Claimant has failed to provide the date(s) when this work took place and the identity of the contractor(s) who performed the work. In addition, Claimant has failed to respond to Respondents' requests regarding whether and where the removed pipes have been stored for safekeeping. Respondents contend Claimant's actions and/or omissions have resulted in spoliation of evidence relating to this alleged defect.</p>

D. Respondents' Response to Claimant's Alleged Defects Involving the Main Sewer Line

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
4	Sewer Problems: 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.	<p>Respondents disclaim liability for this alleged defect. This alleged defect is time barred under NRS 11.202(1) and was released as part of the settlement of the prior litigation. In addition, Claimant's Notice fails to comply with NRS 40.645(3) (b) and (c) in that it does not identify in specific detail, the alleged damage and the exact location of the damage relating to this alleged defect.</p> <p>Claimant also failed to provide notice of the alleged defect prior to performing repairs, and Respondents have been denied their statutory right to repair under NRS 40.6472. Claimant's assertion that the alleged defect "presented an unreasonable risk of injury" did not alleviate Claimant of its obligation to provide timely Notice to Respondents.</p> <p>Furthermore, despite Respondents' multiple requests, Claimant has failed to provide the date(s) when this work took place and the identity of the contractor(s) who performed the work. In addition, Claimant has failed to respond to Respondents' requests regarding the current location of any materials that were removed and replaced as part of the repair. Respondents contend Claimant actions and/or omissions have resulted in spoliation of evidence relating to this alleged defect.</p>

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BWB&O File No.: 1287.551

May 24, 2016

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[REDACTED]

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Should you have any questions or concerns regarding the above, please do not hesitate to contact the undersigned. Thank you for your time and attention.

Very truly yours,

BREMER WHYTE BROWN & O'MEARA LLP



Darlene M. Cartier, Esq.
Peter C. Brown, Esq.

dcartier@bremerwhyte.com
pbrown@bremerwhyte.com

EXHIBIT "E"

DISTRICT COURT CIVIL COVER SHEET

A - 1 6 - 7 4 4 1 4 6 - D

County, Nevada

Case No.

XXII

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):	Defendant(s) (name/address/phone):
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	Panorama Towers Condominium Unit Owners' Association, a Nevada non-profit corporation
Attorney (name/address/phone):	Attorney (name/address/phone):
Peter C. Brown, Esq. and Darlene M. Cartier, Esq.	
Bremer, Whyte, Brown & O'Meara, LLP	
1160 N. Town Center Drive, Suite 250	
Las Vegas, Nevada 89144; 702-258-6665	

II. Nature of Controversy (please select the one most applicable filing type below)

Civil Case Filing Types

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input checked="" type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant	<input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

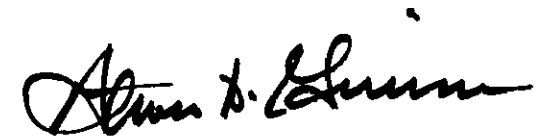
Business Court filings should be filed using the Business Court civil coversheet.

9/28/2016

Date

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

PETER C. BROWN, ESQ.
Nevada Bar No. 5887
DARLENE M. CARTIER, ESQ.
Nevada Bar No. 8775
BREMER WHYTE BROWN & O'MEARA LLP
1160 N. TOWN CENTER DRIVE
SUITE 250
LAS VEGAS, NV 89144
TELEPHONE: (702) 258-6665
FACSIMILE: (702) 258-6662
pbrown@bremerwhyte.com
dcartier@bremerwhyte.com

Attorneys for Plaintiffs,
LAURENT HALLIER; PANORAMA TOWERS I, LLC;
PANORAMA TOWERS I MEZZ, LLC; and M.J. DEAN
CONSTRUCTION, INC.

DISTRICT COURT

CLARK COUNTY, NEVADA

LAURENT HALLIER, an individual;)	Case No.	A - 1 6 - 7 4 4 1 4 6 - D
PANORAMA TOWERS I, LLC, a Nevada)	Dept. No.	XXII
limited liability company; PANORAMA)		
TOWERS I MEZZ, LLC, a Nevada limited)	COMPLAINT	
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.)		

COMES NOW Plaintiffs LAURENT HALLIER; PANORAMA TOWERS I, LLC;
PANORAMA TOWERS I MEZZ LLC; and M.J. DEAN CONSTRUCTION, INC. (hereinafter
collectively referred to as "Plaintiffs"), by and through their attorneys of record, the law firm of
Bremer, Whyte, Brown & O'Meara LLP, and hereby bring their Complaint against Defendant
PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION (hereinafter
referred to as "Defendant"), and complain and allege as follows:

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PARTIES

1. At all times relevant herein, Plaintiff LAURENT HALLIER, was an individual domiciled in Clark County, Nevada.
2. At all times relevant herein, Plaintiff PANORAMA TOWERS I, LLC, was a Nevada corporation duly licensed and authorized to conduct business in Clark County, Nevada.
3. At all times relevant herein, Plaintiff PANORAMA TOWERS I MEZZ, LLC, was a Nevada corporation duly licensed and authorized to conduct business in Clark County, Nevada.
4. At all times relevant herein, Plaintiff M.J. DEAN CONSTRUCTION, INC. was a Nevada corporation duly licensed and authorized to conduct business in Clark County, Nevada.
5. Upon information and belief, Plaintiffs allege that at all times relevant herein, Defendant PANORAMA TOWERS CONDOMINIUM UNIT OWNERS’ ASSOCIATION, was incorporated as a Nevada non-profit Nevada corporation with its principal place of business in Clark County, Nevada.

JURISDICTION AND VENUE

6. This Court has jurisdiction in this matter, and venue is proper in that this Complaint involves claims for alleged construction defects and/or deficiencies at the Panorama Towers Condominiums, located at 4525 Dean Martin Drive (Tower I) and 4575 Dean Martin Drive, Las Vegas, Nevada, Clark County, Nevada (hereinafter “Subject Property”).

GENERAL ALLEGATIONS

7. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 6, inclusive, as though fully set forth herein.
8. Defendant is an “Association” or “Unit-Owners’ Association” as defined in NRS 116.011.
9. On or about February 24, 2016, Defendant, through its counsel, served Plaintiffs with a “Notice to Contractor Pursuant to Nevada Revised Statutes, Section 40.645” (hereinafter “Chapter 40 Notice”).
10. Defendant’s Chapter 40 Notice alleges defects and resulting damages involving: (1) residential tower windows, (2) residential tower fire blocking; (3) mechanical room piping; and (4)

1 sewer piping.

2 11. Defendant's Chapter 40 Notice fails to comply with NRS 40.645(3)(b) and (c) in
3 that it does not identify in specific detail, the alleged damages and the exact location of the damage(s)
4 relating to the alleged residential tower windows, residential tower fire blocking defects or the
5 alleged sewer piping defects.

6 12. Defendant's Chapter 40 Notice includes as an Exhibit, a report by Gregory Fehr,
7 P.E. of Advanced Technology & Marketing Group ("ATMG"), dated November 17, 2011, in
8 support of Defendant's mechanical room piping claims. The ATMG report states that ATMG
9 observed alleged corrosion damage and alleged leaking connections in the mechanical rooms at the
10 Subject Property on or about September 20, 2011. Thus, Defendant had knowledge of the alleged
11 mechanical room piping defects more than 3½ years prior to the date it served Plaintiffs with
12 Defendant's Chapter 40 Notice.

13 13. With respect to the alleged sewer piping defect allegation, Defendant's Chapter 40
14 Notice states "This deficiency has been repaired. In addition to causing, damage, the defective
15 installation presented an unreasonable risk of injury to a person or property resulting from the
16 disbursement of unsanitary matter." Such alleged risk of injury does not and did not alleviate
17 Defendant from its obligation to provide timely Chapter 40 Notice to Plaintiffs of the alleged
18 defect, and to provide a Chapter 40 Notice prior to Defendant performing repairs of the alleged
19 defect.

20 14. Defendant's Chapter 40 Notice also alleges Defendant (i.e. Claimant) is "still in the
21 process of investigating the alleged conditions at the Development, and accordingly, this
22 preliminary list of defects is not intended as a complete statement of all the defects in or at the
23 Development. Claimant reserves the right to amend or update this list in the event that new defects
24 and/or resulting damages are discovered during the course of investigation."

25 15. On March 24, 2016, pursuant to NRS 40.646, Plaintiffs inspected the defects alleged
26 in Defendant's Chapter 40 Notice.

27 16. During Plaintiffs' March 24, 2016, inspection, Plaintiffs observed that the majority
28 of the allegedly defective (i.e. corroded) mechanical room piping had been removed and replaced

1 prior to Plaintiffs' inspection. Defendant did not provide notice to Plaintiffs of the allegedly
2 defective mechanical room piping prior to performing said repair work, including, but not limited
3 to, a Chapter 40 Notice.

4 17. During Plaintiffs' March 24, 2016, inspection, Plaintiffs also became aware that the
5 allegedly defective sewer piping had also been repaired prior to Plaintiffs' inspection. Defendant
6 did not provide notice to Plaintiffs of the allegedly defective sewer piping prior to performing this
7 repair work, including, but not limited to, a Chapter 40 Notice.

8 18. On March 29, 2016, Plaintiffs sent correspondence to Defendant's counsel
9 requesting information and documents relating to (1) the sewer line defect allegations identified in
10 Defendant's Chapter 40 Notice, including the date of occurrence and date of repair of the alleged
11 defects, and requesting the current location of any sewer line materials that were removed and
12 replaced as part of Defendant's repair; and (2) the mechanical room piping defect allegations
13 identified in Defendant's Chapter 40 Notice, including the date when the allegedly corroded pipes
14 were replaced, the date the repair work was performed, the identity of the contractor(s) who
15 performed the repair work, and also requesting Defendant confirm whether and where the removed
16 mechanical room pipe materials have been stored for safekeeping. Defendant did not respond to
17 Plaintiffs' March 29, 2016 correspondence.

18 19. On April 29, 2016, Plaintiffs sent follow up correspondence to Defendant's counsel
19 requesting Defendant promptly provide information and documents relating to (1) the alleged
20 sewer line defect allegations identified in Defendant's Chapter 40 Notice, including the date of
21 occurrence and date of repair of the alleged defects, and requesting the current location of any
22 sewer line materials that were removed and replaced as part of Defendant's repair; and (2) the
23 alleged mechanical room piping defects identified in Defendant's Chapter 40 Notice, including the
24 date when the allegedly corroded pipes were replaced, the date the repair work was performed, the
25 identity of the contractor(s) who performed the repair work, and also requesting Defendant confirm
26 whether and where the removed mechanical room pipe materials have been stored for safekeeping.
27 Plaintiff requested a response from Defendant no later than May 3, 2016. Defendant did not
28 respond to Plaintiffs' April 29, 2016 correspondence.

1 20. On May 24, 2016, Plaintiffs served Defendant with Plaintiffs' Response to
2 Defendant's Chapter 40 Notice.

3 21. On September 26, 2016, Plaintiffs and Defendant participated in a pre-litigation
4 mediation regarding the claims and defects included in Defendant's Chapter 40 Notice, as required
5 by NRS 40.680, but were unable to reach a resolution. As a result, the mandatory pre-litigation
6 process has concluded.

7 22. On February 24, 2015, the Nevada Legislature enacted the Homeowner Protection
8 Act of 2015 (aka Assembly Bill 125) (hereinafter referred to as "AB 125"). AB 125, Section 17,
9 amended NRS 11.202(1), abolishing the previously applicable statutes of limitation and shortening
10 the statute of repose for all claims to six (6) years from the date of substantial completion of an
11 improvement.

12 23. Pursuant to AB 125, Section 21(5) and Section 22, the six-year statute of repose
13 applies retroactively to actions in which substantial completion of the improvement to real property
14 occurred before February 6, 2015.

15 24. Upon information and belief, the Clark County Building Department issued a
16 Certificate of Occupancy for Tower I (4525 Dean Martin Drive) on January 16, 2008.

17 25. Upon information and belief, the Clark County Building Department issued a
18 Certificate of Occupancy for Tower II (4572 Dean Martin Drive) on March 31, 2008.

19 26. Plaintiffs contend the date of substantial completion of Tower I (4525 Dean Martin
20 Drive) (as provided in NRS 11.2055(1)) is on or about January 16, 2008.

21 27. Plaintiffs contend the date of substantial completion of Tower II (4572 Dean Martin
22 Drive) (as provided in NRS 11.2055(1)) is on or about March 31, 2008.

23 28. Plaintiffs are informed and believe, and thereon allege, that the six-year statute of
24 repose applies retroactively to Defendant's Chapter 40 Notice and the defects alleged therein,
25 because substantial completion of the Subject Property occurred prior to enactment of AB 125.
26 Therefore, Plaintiffs are informed and believe, and thereon allege, that Defendant's claims in its
27 Chapter 40 Notice are all time barred by AB 125/NRS 11.202(1).

28 29. The one-year "grace period" contained in AB 125, Section 21(6)(a) allows a

1 construction defect claim to proceed under the pre-AB 125 statutes of repose (i.e. eight-year, ten-
2 year, or unlimited statutes of repose) only if the claim “accrued before the effective date of [the] act
3 [February 24, 2015] and was commenced within 1 year of the effective date of [the] act [February
4 24, 2016]”.

5 30. Plaintiffs are informed and believe, and thereon allege, that in order to be able to
6 rely on AB 125, Section 21(6)(a)’s one-year “grace period,” Defendant was required to provide
7 Chapter 40 Notice to Plaintiffs prior to the effective date of the act [February 24, 2015] and to
8 commence any lawsuit with regard to any unresolved claims prior to the expiration of AB 125,
9 Section 21(6)(a)’s one-year “grace period” [February 24, 2016].

10 31. Defendant did not mail its Chapter 40 Notice to Plaintiffs until February 24, 2016,
11 almost one year after the effective date of AB 125 (i.e. February 24, 2015).

12 32. Defendant did not contend in its Chapter 40 Notice that the claims alleged in its
13 Chapter 40 Notice “accrued before the effective date” of AB 125.

14 33. Defendant did not commence a lawsuit within AB 125, Section 21(6)(a)’s one-year
15 “grace period” (i.e. by February 24, 2016).

16 34. Plaintiffs are informed and believe, and thereon allege, that Defendant’s claims in its
17 Chapter 40 Notice are all time barred by AB 125/NRS 11.202(1).

18 35. Pursuant to NRS 40.615, as amended by AB 125, Section 6, a “Constructional
19 Defect” must present an “unreasonable risk of injury to a person or property” or “proximately cause
20 physical damage to the residence, an appurtenance or the real property to which the residents or
21 appurtenance is affixed.”

22 36. Plaintiffs contend that Defendant’s Chapter 40 Notice failed to provide any evidence
23 that any of the alleged defects involved an unreasonable risk of injury to a person or property or
24 proximately cause physical damage to the Subject Property.

25 37. Pursuant to NRS 40.615, as amended by AB 125, Section 8, a claimant’s Chapter 40
26 Notice must “identify in specific detail each defect, damage and injury to each residence or
27 appurtenance that is the subject of the claim, including, without limitation, the exact location of
28 each such defect, damage and injury...”

1 38. Plaintiffs contend that Defendant's Chapter 40 Notice failed to identify in specific
2 detail, each defect, damage and injury to the Subject Property, including, without limitation, the
3 exact location of each such alleged defect, damage and injury.

4 39. Pursuant to NRS 116.3102 (1)(d), as amended by AB 125, Section 20, "...The
5 association may not institute, defend or intervene in litigation or in arbitration, mediation or
6 administrative proceedings in its own name on behalf of itself of units' owners with respect to an
7 action for constructional defect pursuant to NRS 40.600 to 40.695, inclusive, and sections 2 and 3
8 of the act unless the action pertains exclusively to common elements."

9 40. Plaintiffs are informed and believe, and thereon allege, that the Declaration of
10 Covenants, Conditions and Restrictions and Grant and Reservation of Easements for Panorama
11 Towers ("CC&Rs") for the Subject Property, were recorded by the Clark County Recorder on or
12 about November 7, 2006.

13 41. Article 1 of the Subject Property's CC&Rs relates to Definitions. Section 1.39
14 provides that "Common Elements shall mean all portions of the [Subject] Property other than the
15 Units..."

16 42. Article 4 of the Subject Property's CC&Rs relates to the Unit and Boundary
17 Descriptions. Section 4.2 (e) governs "apertures" and provides "Where there are apertures in any
18 boundary, including, but not limited to, windows, doors, bay windows and skylights, such
19 boundaries shall be extended to include the windows, doors and other fixtures located in such
20 apertures, including all frameworks window casings and weather stripping thereof, except that the
21 exterior surfaces made of glass and other transparent materials ...shall not be included in the
22 boundaries of the Unit and shall therefore be Common Elements."

23 43. Article 6 of the Subject Property's CC&Rs relates to Maintenance. Section 6.4
24 governs maintenance of "units and limited common elements" and provides "Each Owner shall
25 maintain, repair, replace, finish and restore or cause to be so maintained, repaired, replaced and
26 restored, at such Owner's sole expense all portions of such Owner's Unit..."

27 44. Plaintiffs are informed and believe, and thereon allege, that Defendant's claims
28 relating to the residential tower windows as alleged in the Chapter 40 Notice, fall within Article 4,

1 Section 4 (e) and Article 6, Section 6.4, of the Property's CC&Rs and are not within the "Common
2 Elements" as defined in the CC&Rs. Therefore, Plaintiffs contend that Defendant lacks standing
3 under AB 125 to bring claims relating to the residential tower windows.

4 45. On September 9, 2009, Defendant filed a Complaint for construction defects against
5 Plaintiffs PANORAMA TOWERS I, LLC and PANORAMA TOWERS II, LLC, entitled
6 Panorama Towers Condominium Unit Owners' Association v. Panorama Towers I, LLC, et al.
7 (Eighth Judicial District Court, Department XXII, Case No. A-09-598902) (hereinafter referred to
8 as "the Prior Litigation").

9 46. On January 17, 2011, Defendant filed an Amended Complaint in the Prior
10 Litigation, naming Plaintiff M.J. DEAN CONSTRUCTION, INC. and others as additional
11 defendants.

12 47. The parties in the Prior Litigation reached a settlement, and the terms of the
13 settlement were set forth in writing in a Settlement Agreement and Release (hereinafter "Settlement
14 Agreement").

15 48. The Settlement Agreement provides that "...the Agreement may be disclosed and
16 shall be deemed admissible as may be necessary to enforce the terms hereof..."

17 49. Parties to the Settlement Agreement in the Prior Litigation include Plaintiffs
18 PANORAMA TOWERS I, LLC, PANORAMA TOWERS II, LLC, and "all of their past, present
19 and future managers, members, officers, directors, predecessors, successors-in-interest, and assigns
20 and all other persons, firms or entities with whom any of the former have been, are now, or may
21 hereinafter be affiliated," Plaintiff M.J. DEAN CONSTRUCTION, INC., and others.

22 50. Upon information and belief, the Settlement Agreement in the Prior Litigation was
23 executed by Defendant on June 1, 2011, and approved as to form and content by Defendant's
24 counsel on June 3, 2011.

25 51. The Settlement Agreement in the Prior Litigation provides an irrevocable and
26 unconditional release by Defendant of Plaintiffs PANORAMA TOWERS I, LLC, PANORAMA
27 TOWERS II, LLC, and M.J. DEAN CONSTRUCTION, INC., and "all of their respective heirs,
28 executors, administrators, third party administrators, insurers, trustors, trustees, beneficiaries,

1 predecessors, successors, assigns, members, partners, partnerships, parents, subsidiaries, affiliates,
2 and related entities and each of the foregoing respective officers, directors, stockholders,
3 controlling persons, principals, agents, servants, employees, representatives, and all persons, firms
4 and entities connective with them, including, without limitation, their insurers and sureties, who are
5 or who may ever become liable to them as to any and all demands, liens, claims, defects,
6 assignments, contracts, covenants, actions, suits, causes of action, costs, expenses, attorneys [sic]
7 fees, damages, losses, controversies, judgments, orders and liabilities of whatsoever kind and
8 nature, at equity or otherwise, either now known with respect to the construction defect claims ever
9 asserted in the SUBJECT ACTION or related to the alleged defect claims ever asserted in the
10 SUBJECT ACTION...This release specifically does not extend to claims arising out of defects not
11 presently known to the HOA.”

12 52. Plaintiffs PANORAMA TOWERS I, LLC, M.J. DEAN CONSTRUCTION, INC.
13 and/or their privies, Plaintiffs LAURENT HALLIER, PANORAMA TOWERS I MEZZ LLC, and
14 Defendant PANORAMA TOWERS CONDOMINIUM UNIT OWNERS’ ASSOCIATION are the
15 same in the instant matter as in the Prior Litigation. Therefore, Plaintiffs are informed and believe,
16 and thereon allege, that claim preclusion applies to the defects alleged in Defendant’s Chapter 40
17 Notice and prevents Defendants from bringing said claims against Plaintiffs in a subsequent action.

18 53. The Settlement Agreement in the Prior Litigation provides that Plaintiffs (and
19 others) “shall bear no responsibility whatsoever as to the re-design, repairs, remediation, corrective
20 work, maintenance, and/or damage arising therefrom, or how the settlement funds shall be divided,
21 distributed, or spent, or to remedy any of the claims released herein.”

22 54. The Settlement Agreement in the Prior Litigation also provides that Defendant
23 “covenants and agrees that it shall not bring any other claim, action, suit or proceeding” against
24 Plaintiffs (and others) “regarding the matters settled, released and dismissed hereby.”

25 55. Furthermore, the Settlement Agreement in the Prior Litigation also provides that if
26 Defendant, “or any person or organization on its behalf, including an insurer, ever pursues
27 litigation related to the PROJECT which seeks to impose liability for defects that were known to
28 [Defendant]” at the time the Settlement Agreement was executed by Defendant, than “[Defendant]

1 will defend, indemnify, and hold harmless” Plaintiffs (and others) “and their insurers with respect
2 to such litigation.”

3 56. On September 26, 2016, Plaintiffs’ counsel personally tendered Plaintiffs’ defense
4 and indemnity pursuant to the express terms of the Settlement Agreement in the Prior Litigation, to
5 Defendant’s counsel.

6 57. On January 19, 2012, the Court entered an Order based upon the stipulation of
7 counsel and the parties, ordering all claims against Plaintiffs PANORAMA TOWERS I, LLC, M.J.
8 DEAN CONSTRUCTION, INC. and others in the Prior Litigation, be dismissed with prejudice.

9 58. Notice of Entry of the Order dismissing the Prior Litigation against PANORAMA
10 TOWERS I, LLC, M.J. DEAN CONSTRUCTION, INC. and others, with prejudice, was entered
11 on January 23, 2012.

12 59. The dismissal with prejudice of Plaintiffs’ asserted claims and/or related to the
13 asserted claims in the Prior Litigation operates as a final judgment (i.e. an adjudication on the
14 merits) in the Prior Litigation, pursuant to NRCP 41(b). Thus, the final judgment in the Prior
15 Litigation is valid. Therefore, Plaintiffs are informed and believe, and thereon allege, that claim
16 preclusion applies to the defects alleged in Defendant’s Chapter 40 Notice and all grounds of
17 recovery by Defendant against Plaintiffs related thereto.

18 60. Plaintiffs are informed and believe, and thereon allege, that the defects alleged by
19 Defendant in Defendant’s Chapter 40 Notice were asserted in the Prior Litigation and/or are related
20 to alleged defect claims asserted in the Prior Litigation, and were irrevocably released in the
21 Settlement Agreement. Thus, the defects alleged in Defendant’s Chapter 40 Notice are based on
22 the same claims or are part of the same claims brought against Plaintiffs in the Prior Litigation.
23 Therefore, Plaintiffs are informed and believe, and thereon allege, that claim preclusion applies to
24 the defects alleged in Defendant’s Chapter 40 Notice and prevents Defendants from bringing said
25 claims against Plaintiffs in a subsequent action.

26 **FIRST CLAIM FOR RELIEF**

27 **(Declaratory Relief – Application of AB 125)**

28 61. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 60

1 inclusive, as though fully set forth herein.

2 62. Upon information and belief, Defendant intends to file a Complaint against
3 Plaintiffs for the alleged construction defects identified in Defendant's Chapter 40 Notice.

4 63. Upon information and belief, Defendant will seek damages against Plaintiffs for
5 Defendant's prior repair costs, the costs of future repairs, its expert fees and costs, attorney's fees
6 and interest, as well as other damages, relating to the alleged construction defects identified in
7 Defendant's Chapter 40 Notice.

8 64. A justiciable controversy now exists between Plaintiffs and Defendant as to their
9 respective rights and liabilities relating to Defendant's Chapter 40 Notice and the defects alleged
10 therein, including whether any or all of Defendant's claims are all time barred by AB 125/NRS
11 11.202(1), and/or whether Defendant has standing to bring claims relating to the residential tower
12 windows.

13 65. Plaintiffs' and Defendant's interests in the controversy are adverse. Plaintiffs
14 contend Defendant may not recover damages against Plaintiffs relating to the claims in Defendant's
15 Chapter 40 Notice. Upon information and belief, Defendant contends otherwise. Thus, Plaintiffs'
16 and Defendant's interests are adverse to each other.

17 66. Plaintiffs assert a claim of a legally protectible right with respect to Defendant's
18 Chapter 40 Notice and the construction defects alleged therein. Plaintiffs have a legally protectible
19 interest with respect to whether a jury awards damages against them in favor or Defendant.

20 67. Plaintiffs and Defendant have completed the mandatory pre-litigation process for the
21 construction defect claims alleged in Defendant's Chapter 40 Notice. As a result, the controversy
22 is ripe for judicial determination.

23 68. All the rights and obligations of the parties hereto arose out of what is actually one
24 transaction or one series of transactions, happenings or events, all of which can be settled and
25 determined in a judgment in this one action.

26 69. Plaintiffs allege that an actual controversy exists between Plaintiffs and Defendant
27 under the circumstances alleged, which Plaintiffs request the Court resolve. A declaration of
28 rights, responsibilities and obligations of Plaintiffs and Defendant, and each of them, is essential to

1 determine their respective obligations in connection with Defendant's Chapter 40 Notice and the
2 claims alleged therein, and Plaintiffs have no true and speedy remedy at law of any kind.

3 70. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown
4 & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their
5 reasonable attorneys' fees and costs incurred therein.

6 **SECOND CLAIM FOR RELIEF**

7 **(Declaratory Relief – Claim Preclusion)**

8 71. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 70,
9 inclusive, as though fully set forth herein.

10 72. Upon information and belief, Defendant intends to file a Complaint against
11 Plaintiffs for the alleged construction defects identified in Defendant's Chapter 40 Notice.

12 73. Upon information and belief, Defendant will seek damages against Plaintiffs for
13 Defendant's prior repair costs, the costs of future repairs, its expert fees and costs, attorney's fees
14 and interest, as well as other damages, relating to the alleged construction defects identified in
15 Defendant's Chapter 40 Notice.

16 74. A justiciable controversy now exists between Plaintiffs and Defendant as to their
17 respective rights and liabilities relating to the Settlement Agreement in the Prior Litigation and the
18 defects alleged and released therein.

19 75. Plaintiffs' and Defendant's interests in the controversy are adverse. Plaintiffs
20 contend Defendant may not recover damages against Plaintiffs relating to the alleged
21 defects/claims released in the Settlement Agreement in the Prior Litigation. Upon information and
22 belief, Defendant contends otherwise. Thus, Plaintiffs' and Defendant's interests are adverse to
23 each other.

24 76. Plaintiffs assert a claim of a legally protectible right with respect to the Settlement
25 Agreement in the Prior Litigation and the defects alleged and released therein. Plaintiffs have a
26 legally protectible interest with respect to whether a jury awards damages against them in favor or
27 Defendant.

77. Plaintiffs and Defendant have completed the mandatory pre-litigation process for the construction defect claims alleged in Defendant's Chapter 40 Notice. As a result, the controversy is ripe for judicial determination.

78. All the rights and obligations of the parties hereto arose out of what is actually one transaction or one series of transactions, happenings or events, all of which can be settled and determined in a judgment in this one action.

79. Plaintiffs allege that an actual controversy exists between Plaintiffs and Defendant under the circumstances alleged, which Plaintiffs request the Court resolve. A declaration of rights, responsibilities and obligations of Plaintiffs and Defendant, and each of them, is essential to determine their respective obligations in connection with the Settlement Agreement in the Prior Litigation, and Plaintiffs have no true and speedy remedy at law of any kind.

80. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their reasonable attorneys' fees and costs incurred therein.

THIRD CLAIM FOR RELIEF

(Failure to Comply With NRS 40.600 et seq.)

81. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 80, inclusive, as though fully set forth herein.

82. Defendant failed to comply with NRS 40.645(2)(b) and (c) in that Defendant's Chapter 40 Notice does not identify in specific detail the alleged defect, damage and injury, including without limitation, the exact location of the alleged defect, damage and injury, relating to the alleged residential tower windows defects.

83. Defendant failed to comply with NRS 40.645(2)(b) and (c) in that Defendant's Chapter 40 Notice does not identify in specific detail the alleged defect, damage and injury, including without limitation, the exact location of the alleged defect, damage and injury, relating to the alleged residential tower fire blocking defects.

84. Defendant failed to comply with NRS 40.645(2)(b) and (c) in that Defendant's Chapter 40 Notice does not identify in specific detail the alleged defect, damage and injury, including

1 without limitation, the exact location of the alleged defect, damage and injury, relating to the alleged
2 mechanical room piping defects.

3 85. Defendant failed to comply with NRS 40.645(2)(b) and (c) in that Defendant's
4 Chapter 40 Notice does not identify in specific detail the alleged defect, damage and injury, including
5 without limitation, the exact location of the alleged defect, damage in injury, relating to the alleged
6 sewer line defects.

7 86. Defendant failed to comply with NRS 40.645(1)(a) in that Defendant failed to
8 provide a Chapter 40 Notice to Plaintiffs regarding the alleged residential tower windows defects
9 prior to performing repairs, thereby denying Plaintiffs' statutory rights under NRS 40.6472.

10 87. Defendant failed to comply with NRS 40.645(1)(a) in that Defendant failed to
11 provide a Chapter 40 Notice to Plaintiffs regarding the alleged mechanical room piping defects
12 prior to performing repairs, thereby denying Plaintiffs' statutory rights under NRS 40.6472.

13 88. Defendant failed to comply with NRS 40.645(1)(a) in that Defendant failed to
14 provide a Chapter 40 Notice to Plaintiffs regarding the alleged sewer piping defects prior to
15 performing repairs, thereby denying Plaintiffs' statutory rights under NRS 40.6472.

16 89. As a result of Defendant's failure to comply with NRS 40.600 et seq., Plaintiffs
17 have been denied their statutory rights under NRS 40.600 et seq.

18 90. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown
19 & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their
20 reasonable attorneys' fees and costs incurred therein.

21 **FOURTH CLAIM FOR RELIEF**
22 **(Suppression of Evidence/Spoliation)**

23 91. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 90,
24 inclusive, as though fully set forth herein.

25 92. Plaintiffs are informed and believe, and thereon allege that Defendant and/or its
26 agents have intentionally suppressed and/or destroyed evidence relating to Defendant's claims
27 against Plaintiffs and/or Plaintiffs' defenses to such claims with the intent to harm Plaintiffs, or
28 Defendants negligently lost or destroyed such evidence.

93. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their reasonable attorneys' fees and costs incurred therein.

FIFTH CLAIM FOR RELIEF

(Breach of Contract)

94. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 93, inclusive, as though fully set forth herein.

95. Plaintiffs and Defendant entered into a Settlement Agreement in the Prior Litigation; whereby: (1) in full and complete settlement of the claims asserted in the Prior Litigation, Plaintiffs paid a monetary settlement to Defendant, the amount of which is confidential; (2) Defendant expressly agreed it would not bring any other claim, action, suit or proceeding against Plaintiffs (and others) regarding the matters settled, released and dismissed in the Prior Litigation; and (3) Defendant agreed to defend and indemnify Plaintiffs (and others) and to hold Plaintiffs (and others) harmless with respect to any litigation relating to defects that were known to Defendant at the time Defendant executed the Settlement Agreement.

96. Plaintiffs have performed all the terms, conditions, covenants and promises required of Plaintiffs in the Settlement Agreement. Defendant failed and refused to perform the terms, conditions, covenants and promises required of Defendant in the Settlement Agreement, despite Plaintiffs' demand to do so, thereby materially breaching the terms of the settlement and the Settlement Agreement.

97. As a proximate cause of Defendant's breaches of the Settlement Agreement, Plaintiffs have and continue to suffer damages, which include, without limitation, attorney's fees, costs, statutory interest and costs, expended in pursuant of this Complaint.

98. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their reasonable attorneys' fees and costs incurred therein.

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1 **SIXTH CLAIM FOR RELIEF**

2 **(Declaratory Relief - Duty to Defend)**

3 99. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 98,
4 inclusive, as though fully set forth herein.

5 100. Pursuant to the Settlement Agreement in the Prior Litigation, Plaintiffs contend
6 Defendant has a duty to defend Plaintiffs (and others) with respect to any subsequent litigation
7 relating to defects that were known to Defendant at the time Defendant executed the Settlement
8 Agreement, and upon information and belief, Defendant contends otherwise.

9 101. A justiciable controversy now exists between Plaintiffs and Defendant as to their
10 respective rights and obligations in the Settlement Agreement in the Prior Litigation in that
11 Plaintiffs contend that Defendant has a duty to defend Plaintiffs (and others) involving the alleged
12 defects/claims released in the Settlement Agreement in the Prior Litigation, including, but not
13 limited to, Defendant's alleged residential tower windows, and residential tower fire blocking
14 defects, which Plaintiffs assert were known to Defendant at the time Defendant executed the
15 Settlement Agreement or are reasonably related to claims that were known to Defendant at the time
16 Defendant executed the Settlement Agreement. Upon information and belief, Defendant contends
17 otherwise. Thus, Plaintiffs' and Defendant's interests in the controversy are adverse.

18 102. Plaintiffs assert a claim of a legally protectible right with respect to the Settlement
19 Agreement in the Prior Litigation and the defects alleged and settled therein. Plaintiffs have a
20 legally protectible interest with respect to whether a jury awards damages against them in favor or
21 Defendant.

22 103. Plaintiffs and Defendant have completed the mandatory pre-litigation process for the
23 construction defect claims alleged in Defendant's Chapter 40 Notice. As a result, the controversy
24 is ripe for judicial determination.

25 104. All the rights and obligations of the parties hereto arose out of what is actually one
26 transaction or one series of transactions, happenings or events, all of which can be settled and
27 determined in a judgment in this one action.

28 105. Plaintiffs allege that an actual controversy exists between Plaintiffs and Defendant

1 under the circumstances alleged, which Plaintiffs request the Court resolve. A declaration of
2 rights, responsibilities and obligations of Plaintiffs and Defendant, and each of them, is essential to
3 determine their respective obligations in connection with the Settlement Agreement in the Prior
4 Litigation, and Plaintiffs have no true and speedy remedy at law of any kind.

5 106. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown
6 & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their
7 reasonable attorneys' fees and costs incurred therein.

8 **SEVENTH CLAIM FOR RELIEF**

9 **(Declaratory Relief - Duty to Indemnify)**

10 107. Plaintiffs refer to, reallege and incorporate by reference Paragraphs 1 through 106,
11 inclusive, as though fully set forth herein.

12 108. Pursuant to the Settlement Agreement in the Prior Litigation, Plaintiffs contend
13 Defendant has a duty indemnify Plaintiffs and to hold Plaintiffs (and others) harmless with respect
14 to any subsequent litigation relating to defects that were known to Defendant at the time Defendant
15 executed the Settlement Agreement, and upon information and belief, Defendant contends
16 otherwise.

17 109. A justiciable controversy now exists between Plaintiffs and Defendant as to their
18 respective rights and obligations in the Settlement Agreement in the Prior Litigation in that
19 Plaintiffs contend that Defendant has a duty to defend Plaintiffs (and others) involving the alleged
20 defects/claims released in the Settlement Agreement in the Prior Litigation, including, but not
21 limited to, Defendant's alleged residential tower windows, and residential tower fire blocking
22 defects, which Plaintiffs assert were known to Defendant at the time Defendant executed the
23 Settlement Agreement or are reasonably related to claims that were known to Defendant at the time
24 Defendant executed the Settlement Agreement. Upon information and belief, Defendant contends
25 otherwise. Thus, Plaintiffs' and Defendant's interests in the controversy are adverse.

26 110. Plaintiffs assert a claim of a legally protectible right with respect to the Settlement
27 Agreement in the Prior Litigation and the defects alleged and settled therein. Plaintiffs have a
28

1 legally protectible interest with respect to whether a jury awards damages against them in favor or
2 Defendant.

3 111. Plaintiffs and Defendant have completed the mandatory pre-litigation process for the
4 construction defect claims alleged in Defendant's Chapter 40 Notice. As a result, the controversy
5 is ripe for judicial determination.

6 112. All the rights and obligations of the parties hereto arose out of what is actually one
7 transaction or one series of transactions, happenings or events, all of which can be settled and
8 determined in a judgment in this one action.

9 113. Plaintiffs allege that an actual controversy exists between Plaintiffs and Defendant
10 under the circumstances alleged, which Plaintiffs request the Court resolve. A declaration of
11 rights, responsibilities and obligations of Plaintiffs and Defendant, and each of them, is essential to
12 determine their respective obligations in connection with the Settlement Agreement in the Prior
13 Litigation, and Plaintiffs have no true and speedy remedy at law of any kind.

14 114. It has been necessary for Plaintiffs to retain the services of Bremer, Whyte, Brown
15 & O'Meara LLP to bring this action. Accordingly, Plaintiffs are entitled to recover their
16 reasonable attorneys' fees and costs incurred therein.

17 **WHEREFORE**, Plaintiffs pray for judgment against Defendant, as follows:

- 18 1. For a declaration of rights and obligations as between Plaintiffs and Defendant
19 pursuant to NRS 30.010;
- 20 2. For general and special damages in excess of \$10,000.00;
- 21 3. For reasonable attorney's fees, costs, expert costs and expenses, pursuant to
22 statutory law, common law, and contract law;

23 ///

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25 ///

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27 ///

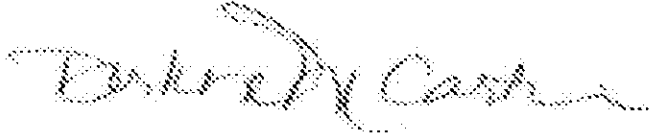
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- 4. For prejudgment interest; and
- 5. For such other and further relief as this Court may deem just, equitable and proper.

Dated: September 28, 2016

BREMER WHYTE BROWN & O’MEARA LLP

By: 
Peter C. Brown, Esq.
Nevada State Bar No. 5887
Darlene M. Cartier, Esq.
Nevada State Bar No. 8775
Attorneys for Plaintiffs,
LAURENT HALLIER; PANORAMA
TOWERS I, LLC; PANORAMA
TOWERS I MEZZ, LLC; and M.J. DEAN
CONSTRUCTION, INC.

1 PETER C. BROWN, ESQ.
Nevada Bar No. 5887
2 DARLENE M. CARTIER, ESQ.
Nevada Bar No. 8775
3 BREMER WHYTE BROWN & O'MEARA LLP
1160 N. TOWN CENTER DRIVE
4 SUITE 250
LAS VEGAS, NV 89144
5 TELEPHONE: (702) 258-6665
FACSIMILE: (702) 258-6662
6 pbrown@bremerwhyte.com
dcartier@bremerwhyte.com
7
Attorneys for Plaintiffs,
8 LAURENT HALLIER; PANORAMA TOWERS I, LLC;
PANORAMA TOWERS I MEZZ, LLC; and M.J. DEAN
9 CONSTRUCTION, INC.

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12
13 LAURENT HALLIER, an individual;) Case No.
PANORAMA TOWERS I, LLC, a Nevada) Dept. No.
14 limited liability company; PANORAMA)
TOWERS I MEZZ, LLC, a Nevada limited) **INITIAL APPEARANCE FEE**
15 liability company; and M.J. DEAN) **DISCLOSURE**
CONSTRUCTION, INC., a Nevada Corporation,)
16)
Plaintiffs,)
17)
vs.)
18)
PANORAMA TOWERS CONDOMINIUM)
19 UNIT OWNERS' ASSOCIATION, a Nevada)
non-profit corporation,)
20)
Defendant.)
21)

22 Pursuant to N.R.S. Chapter 19, as amended by Senate Bill 106, filing fees are submitted for
23 the party appearing in the above-entitled action as indicated below:

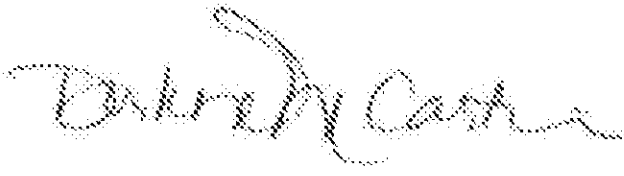
24 CONSTRUCTION DEFECT FILING FEE:	\$520.00
25 LAURENT HALLIER:	\$30.00
26 PANORAMA TOWERS I, LLC:	\$30.00
27 PANORAMA TOWERS I MEZZ, LLC:	\$30.00

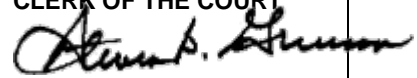
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M.J. DEAN CONSTRUCTION, INC.: \$30.00
TOTAL REMITTED: \$640.00

Dated: September 28, 2016 BREMER WHYTE BROWN & O’MEARA LLP

By: 
Peter C. Brown, Esq.
Nevada State Bar No. 5887
Darlene M. Cartier, Esq.
Nevada State Bar No. 8775
Attorneys for Plaintiffs,
LAURENT HALLIER; PANORAMA
TOWERS I, LLC; PANORAMA
TOWERS I MEZZ, LLC; and M.J. DEAN
CONSTRUCTION, INC.



PETER C. BROWN, ESQ.
Nevada State Bar No. 5887
JEFFREY W. SAAB, ESQ.
Nevada State Bar No. 11261
DEVIN R. GIFFORD, ESQ.
Nevada State Bar No. 14055
CYRUS S. WHITTAKER, ESQ.
Nevada State Bar No. 14965
BREMER WHYTE BROWN & O'MEARA LLP
1160 N. TOWN CENTER DRIVE
SUITE 250
LAS VEGAS, NV 89144
TELEPHONE: (702) 258-6665
FACSIMILE: (702) 258-6662
pbrown@bremerwhyte.com
jsaab@bremerwhyte.com
dgifford@bremerwhyte.com
cwhittaker@bremerwhyte.com

Attorneys for Plaintiffs/Counter-Defendants,
LAURENT HALLIER; PANORAMA TOWERS I, LLC;
PANORAMA TOWERS I MEZZ, LLC; and M.J. DEAN
CONSTRUCTION, INC.

DISTRICT COURT
CLARK COUNTY, NEVADA

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,

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.

) Case No. A-16-744146-D
)
) Dept. XXII
)
) **APPENDIX TO PLAINTIFFS/
COUNTER-DEFENDANTS LAURENT
HALLIER; PANORAMA TOWERS I,
LLC; PANORAMA TOWERS I MEZZ,
LLC; AND M.J. DEAN
CONSTRUCTION, INC.'S, MOTION
FOR ATTORNEYS FEES PURSUANT
TO NRS 18.010(2)(B) – Volume II of II**

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;)
SIERRA GLASS & MIRROR, INC.; F.)
ROGERS CORPORATION; DEAN ROOFING)
COMPANY; FORD CONTRACTING, 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 , inclusive,)
Counter-Defendants.)

**APPENDIX TO PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER;
PANORAMA TOWERS I, LLC; PANORAMA TOWERS I MEZZ, LLC; AND M.J. DEAN
CONSTRUCTION, INC.'S, MOTION FOR ATTORNEYS FEES PURSUANT TO NRS
18.010(2)(B) – Volume II of II**

COMES NOW, Plaintiffs/Counter-Defendants LAURENT HALLIER, PANORAMA
TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC, and M.J. DEAN CONSTRUCTION,
INC. (herein after collectively referred to as “the Builders”), by and through their counsel of record,
Peter C. Brown, Esq., Jeffrey W. Saab, Esq., Devin R. Gifford, Esq. and Cyrus S. Whittaker, Esq.
of the law firm of Bremer Whyte Brown & O’Meara, LLP and hereby submits their Appendix to
Motion for Attorney’s Fees Pursuant to NRS 18.010(2)(B).

Exhibit No.	Brief Description	# of Pages (including exhibit page)	Location of exhibit within Motion
F	Invoices for May 2016-December 2017	381	Pages 5, 12
G	Findings of Fact, Conclusions of Law, and Order filed November 30, 2018	19	Pages 5, 12, 13
H	Amended Chapter 40 Notice dated April 5, 2018	49	Pages 5, 12
I	March 29, 2016 Correspondence to Association	3	Pages 5, 14
J	April 29, 2016 Correspondence to	3	Pages 5, 14

Exhibit No.	Brief Description	# of Pages (including exhibit page)	Location of exhibit within Motion
	Association		
K	Response to Amended Chapter 40 Notice dated December 28, 2018	12	Pages 5, 15
L	Invoices-2018-Jan. 2019	265	Pages 5, 15
M	Invoices-March, April May 2019	223	Pages 5, 16

Date: June 16, 2019

BREMER WHYTE BROWN & O'MEARA LLP

By: 

Peter C. Brown, Esq.
Nevada State Bar No. 5887
Jeffrey W. Saab, Esq.
Nevada State Bar No. 11261
Devin R. Gifford, Esq.
Nevada State Bar No. 14055
Cyrus S. Whittaker, Esq.
Nevada State Bar. No. 14965
Attorneys for Plaintiffs/Counter-Defendants
LAURENT HALLIER, PANORAMA TOWERS I,
LLC, PANORAMA TOWERS I MEZZ, LLC, and
M.J. DEAN CONSTRUCTION, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June 2019 a true and correct copy of the foregoing document was electronically delivered to Odyssey for service upon all electronic service list recipients.



Jennifer Vela, an employee of
Bremer, Whyte, Brown & O'Meara LLP

EXHIBIT "F"

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~~~

Page: 1  
May 31, 2016  
Account No: 1287-5511M  
Statement No: 1

|            |     |      |      | <u>Fees</u>                                                                                                                                                    |       |        |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      |                                                                                                                                                                | Hours | Amount |
| 03/21/2016 | PCB | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) [REDACTED]                                                                                            | 0.40  | 70.00  |
|            | PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH MKA AND MICHAEL WINTHEISER (PROPOSED EXPERTS)(TWO CALLS) RE: [REDACTED]                                                      | 0.20  | 35.00  |
|            | PCB | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH PERSONAL COUNSEL FOR M.J. DEAN AND PERSONAL COUNSEL FOR THE DEVELOPER (2 CALLS) RE: [REDACTED]                               | 0.10  | 17.50  |
|            | PCB | L340 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: REQUEST FOR ACCESS TO SITE TO PERFORM EXPERT INVESTIGATION.                                       | 0.10  | 17.50  |
| 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                           | 0.30  | 52.50  |
|            | PCB | L340 | A101 | PLAN AND PREPARE FOR UPCOMING INSPECTION OF THE NEW ISSUES, [REDACTED]                                                                                         | 0.50  | 87.50  |
| 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. | 0.40  | 70.00  |
|            | PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THREE EXPERTS (MKA, EMP AND KEN REID) THROUGHOUT THE DAY (VIA EMAILS AND PHONE CALLS) RE: [REDACTED]                         | 0.50  | 87.50  |
|            | LK  | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S THIRTY SECOND THROUGH THIRTY FIFTH PRODUCTION OF DOCUMENTS- PLAINTIFF'S                                                             |       |        |



CHUBB INSURANCE

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

Page: 2
May 31, 2016
Account No: 1287-5511M
Statement No: 1

| | | | | Hours | Amount |
|----|------|------|--|-------|--------|
| | | | EXPERT JOB FILE DOCUMENTS AND MATERIALS, RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-SECOND PRODUCTION OF DOCUMENTS- PANORAMA TOWERS IN-HOUSE WORK ORDERS, RE: [REDACTED] | 0.80 | 96.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-FIFTH THROUGH FORTY SIXTH PRODUCTION OF DOCUMENTS- COMPLAINT & REPAIR RECORDS, PANORAMA TOWERS DAILY EQUIPMENT CHECK REPORT, RE: [REDACTED] | 0.40 | 48.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS- SIERRA GLASS PLANS, RE: [REDACTED] | 0.60 | 72.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FIFTY SECOND THROUGH FIFTY FOURTH PRODUCTION OF DOCUMENTS- PANORAMA TOWERS MAINTENANCE SCHEDULES AND WORK ORDERS, RE: [REDACTED] | 0.40 | 48.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FIRST PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIRST BATCH, RE: [REDACTED] | 0.60 | 72.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S SECOND PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS SECOND BATCH, RE: [REDACTED] | 0.70 | 84.00 |
| | | | [REDACTED] | | |

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|------------|----|------|------|----------------------------------------------------------------------------------------------------------|-------|--------|
|            |    |      |      |                                                                                                          | 0.80  | 96.00  |
| 03/24/2016 | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S THIRD PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS THIRD BATCH, RE: [REDACTED]   |       |        |
|            |    |      |      |                                                                                                          | 0.90  | 108.00 |
|            | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FOURTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FOURTH BATCH, RE: [REDACTED] |       |        |
|            |    |      |      |                                                                                                          | 0.70  | 84.00  |
|            | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FIFTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIFTH BATCH, RE: [REDACTED]   |       |        |
|            |    |      |      |                                                                                                          | 0.90  | 108.00 |
|            | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S SIXTH PRODUCTION OF DOCUMENTS- SIXTH JOB FILE BATCH, RE: [REDACTED]             |       |        |
|            |    |      |      |                                                                                                          | 0.80  | 96.00  |
|            | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S SEVENTH PRODUCTION OF DOCUMENTS- SEVENTH JOB FILE BATCH, RE: [REDACTED]         |       |        |
|            |    |      |      |                                                                                                          | 0.90  | 108.00 |

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|-----|------|------|--|-------|--------|
| LK | L320 | A104 | REVIEW/ANALYZE AND OBTAIN INFORMATION, RE:
OLDCASTLE, INC. AND OLDCASTLE BUILDING ENVELOPE, [REDACTED] | 0.60 | 72.00 |
| PCB | L390 | A104 | REVIEW/ANALYZE FILE MATERIALS FROM THE PROJECT AND
THE CHAPTER 40 NOTICE IN PREPARATION FOR ATTENDANCE
AT SITE INSPECTION WITH EXPERTS. | 0.60 | 105.00 |
| PCB | L390 | A109 | APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION WITH
CLIENTS' EXPERTS (NO TRAVEL TIME INCLUDED IN THIS
ENTRY). | 4.30 | 752.50 |
| PCB | L390 | A109 | APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION
(SEPARATE NON-BILLABLE TRAVEL TIME). | 1.20 | n/c |
| PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS
(CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | 0.20 | 35.00 |
| JBV | L130 | A108 | COMMUNICATE WITH MADSEN, KNEPPERS & ASSOCIATES,
RE: [REDACTED] | 0.20 | 24.00 |
| JBV | L110 | A108 | COMMUNICATE WITH LITIGATION SERVICES, RE: OBTAINING
ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS
LITIGATION FOR PANORAMA TOWERS, [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM
LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW
DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR
PANORAMA TOWERS, [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A103 | DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION
SERVICES, RE: REQUEST FOR UPDATED LIST OF ALL
DOCUMENTATION DISCLOSED BY ALL PARTIES DURING
PRIOR CONSTRUCTION DEFECT LITIGATION. | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE ADDITIONAL EMAIL CORRESPONDENCE
FROM LITIGATION SERVICES, RE: UPDATED LIST OF ALL
DOCUMENTATION DISCLOSED FOR PRIOR CONSTRUCTION
DEFECT LITIGATION, [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE UPDATED LIST OF ALL DOCUMENTATION
DISCLOSED BY ALL PARTIES FROM PRIOR CONSTRUCTION
DEFECT LITIGATION, RE: DETERMINING IF MJ DEAN
CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN
AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION, [REDACTED] | 0.10 | 12.00 |

| | | | | Hours | Amount |
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| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR
AQUAMATIC, RE: VERIFYING PROPER AND LEGAL LOCATION
TO SERVE CHAPTER 40 CORRESPONDENCE ON BEHALF OF
CLIENT, PURSUANT TO NRS 40.646. | 0.10 | 12.00 |
| JBV | L130 | A108 | COMMUNICATE WITH CLIENT'S EXPERT, SHELLY ROBBINS,
RE: [REDACTED] | | |
| JBV | L130 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM CLIENT'S
EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS &
ASSOCIATES, RE: [REDACTED] | 0.20 | 24.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S INITIAL PRODUCTION OF DOCUMENTS
(P0000001-P0000856), RE: [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S SECOND PRODUCTION OF DOCUMENTS
(P0000857-P0001544), RE: [REDACTED] | 0.20 | 24.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S THIRD PRODUCTION OF DOCUMENTS
(P0001545-P0001612), RE: [REDACTED] | 0.20 | 24.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FOURTH PRODUCTION OF DOCUMENTS
(P0001613-P0002486), RE: [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTH PRODUCTION OF DOCUMENTS
(P0002487-P0002498), RE: [REDACTED] | 0.20 | 24.00 |

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| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SIXTH PRODUCTION OF DOCUMENTS (P0002499), RE: [REDACTED]             | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SEVENTH PRODUCTION OF DOCUMENTS (P0002500-P2527), RE: [REDACTED]     | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S EIGHTH PRODUCTION OF DOCUMENTS (P0002528-P003351), RE: [REDACTED]    | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S NINTH PRODUCTION OF DOCUMENTS (P0003352-P0007044), RE: [REDACTED]    | 0.30  | 36.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TENTH PRODUCTION OF DOCUMENTS (P0007045-P0008427), RE: [REDACTED]    | 0.40  | 48.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S ELEVENTH PRODUCTION OF DOCUMENTS (P0008428-P0010290), RE: [REDACTED] | 0.30  | 36.00  |

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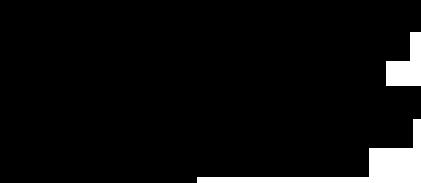
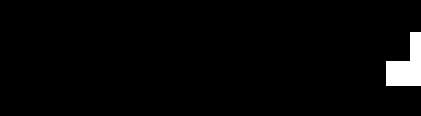
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|-----|------|------|--|-------|--------|
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S TWELFTH PRODUCTION OF DOCUMENTS (P0010291-P0010602), RE: | 0.40 | 48.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRTEENTH PRODUCTION OF DOCUMENTS (P0010603-P0010891), RE: | 0.20 | 24.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FOURTEENTH PRODUCTION OF DOCUMENTS (P0010892-P0011105), RE: | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTEENTH PRODUCTION OF DOCUMENTS (P0011106-P0011431), RE: | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SIXTEENTH PRODUCTION OF DOCUMENTS (P0011432-P0013410), RE: | 0.20 | 24.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S SEVENTEENTH PRODUCTION OF DOCUMENTS (P0013411-P0013574), RE: | 0.30 | 36.00 |

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|     |      |      |                                                                                                                               |       |        |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S EIGHTEENTH PRODUCTION OF DOCUMENTS<br>(P0013575-P13684), RE:         | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S NINETEENTH PRODUCTION OF DOCUMENTS<br>(P0013685-P0015665), RE:      | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTIETH PRODUCTION OF DOCUMENTS<br>(P0015666-P0015963), RE:      | 0.30  | 36.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-FIRST PRODUCTION OF DOCUMENTS<br>(P0015964-P16520), RE:     | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-SECOND PRODUCTION OF DOCUMENTS<br>(P0016521-P0016656), RE:  | 0.30  | 36.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-THIRD PRODUCTION OF DOCUMENTS<br>(P0016657-P0016743), RE:   | 0.10  | 12.00  |

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| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-FOURTH PRODUCTION OF DOCUMENTS
(P0016744-P0016862), RE: | 0.10 | 12.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-FIFTH PRODUCTION OF DOCUMENTS
(P0016863-P0018381), RE: | 0.10 | 12.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-SIXTH PRODUCTION OF DOCUMENTS
(P0018382-P0019204), RE: | 0.30 | 36.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-SEVENTH PRODUCTION OF
DOCUMENTS (P0019205-P0019212), RE: | 0.20 | 24.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-EIGHTH PRODUCTION OF DOCUMENTS
(P0019213-P0019224), RE: | 0.10 | 12.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWENTY-NINTH PRODUCTION OF DOCUMENTS
(P0019225-P0020007), RE: | 0.10 | 12.00 |
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|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.30  | 36.00  |
|            | JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRTIETH PRODUCTION OF DOCUMENTS (P0020008-P0020242), RE: [REDACTED]    |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.10  | 12.00  |
|            | JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRTY-FIRST PRODUCTION OF DOCUMENTS (P0020243-P0021372), RE: [REDACTED] |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.10  | 12.00  |
| 03/25/2016 | JBV | L110 | A108 COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED]                    |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.20  | 24.00  |
|            | JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SEVENTH PRODUCTION OF DOCUMENTS (P0069102-69107), RE: [REDACTED]   |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.10  | 12.00  |
|            | JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SIXTH PRODUCTION OF DOCUMENTS (P0068453-69101), RE: [REDACTED]     |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          | 0.40  | 48.00  |
|            | JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-FIFTH PRODUCTION OF DOCUMENTS (P0068437-68452), RE: [REDACTED]     |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |
|            |     |      | [REDACTED]                                                                                                                          |       |        |

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| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTY-FOURTH PRODUCTION OF DOCUMENTS
(P0067635-68436), RE: | 0.10 | 12.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTY-THIRD PRODUCTION OF DOCUMENTS
(P0067532-67634), RE: | 0.40 | 48.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTY-SECOND PRODUCTION OF DOCUMENTS
(P0061805-67531), RE: | 0.20 | 24.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTY-FIRST PRODUCTION OF DOCUMENTS
(P0061656-61804), RE: | 0.70 | 84.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTIETH PRODUCTION OF DOCUMENTS
(P0061534-61655), RE: | 0.30 | 36.00 |
| | | | | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS
(P0061330-61533), RE: | 0.20 | 24.00 |
| | | | | | |

| | | | | Hours | Amount |
|-----|------|------|---|-------|--------|
| | | | [REDACTED] | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FORTY-EIGHTH PRODUCTION OF DOCUMENTS (P0054588-61329), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| JBV | L110 | A104 | REVIEW/ANALYZE SIERRA GLASS PLANS AS DISCLOSED BY PLAINTIFF'S COUNSEL (P0061254-61329), RE: [REDACTED] | 0.90 | 108.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| JBV | L110 | A108 | COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, KEN REID, RE: [REDACTED] | 0.20 | 24.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| JBV | L110 | A104 | REVIEW/ANALYZE PLAINTIFF'S NRS CHAPTER 40 CORRESPONDENCE TO CLIENT, MJ DEAN DATED FEBRUARY 24, 2016. RE: [REDACTED] | 0.20 | 24.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR TEXAS WALL SYSTEMS, RE: [REDACTED] | 0.30 | 36.00 |
| | | | [REDACTED] | | |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO TEXAS WALL SYSTEMS, RE: [REDACTED] | 0.10 | 12.00 |
| | | | [REDACTED] | | |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR BOMBARD MECHANICAL, RE: [REDACTED] | 0.10 | 12.00 |
| | | | [REDACTED] | | |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO BOMBARD MECHANICAL, RE: [REDACTED] | 0.10 | 12.00 |
| | | | [REDACTED] | | |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR INSULPRO PROJECTS, RE: [REDACTED] | 0.10 | 12.00 |
| | | | [REDACTED] | | |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO | 0.10 | 12.00 |

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|     |      |      | INSULPRO PROJECTS, RE: [REDACTED]                                                                                                            |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR FLIPPIN'S TRENCHING, RE: [REDACTED]                                                                 |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO FLIPPIN'S TRENCHING, RE: [REDACTED]                                                                |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR VICTAULIC, RE: [REDACTED]                                                                           |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO VICTAULIC, RE: [REDACTED]                                                                          |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR SIERRA GLASS & MIRROR, RE: [REDACTED]                                                               |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO SIERRA GLASS & MIRROR, RE: [REDACTED]                                                              |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: [REDACTED]                                                       |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLDCASTLE, INC., RE: [REDACTED]                                                                    |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR CULLIGAN WATER (TWO ENTITIES), RE: [REDACTED]                                                       |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN WATER COMPANY OF NEVADA, INC. ALSO KNOWN AS CULLIGAN WATER COMPANY, LLC, RE: [REDACTED]   |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN PURE WATER ALSO KNOWN AS CULLIGAN WATER CONDITIONING OF LAS VEGAS, NEVADA, RE: [REDACTED] |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO AQUAMATIC, RE: [REDACTED]                                                                          |       |        |
|     |      |      | [REDACTED]                                                                                                                                   | 0.10  | 12.00  |

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|            | PCB | L250 | A104 | REVIEW/ANALYZE FILE MATERIALS IN ORDER TO MAKE SURE ALL NECESSARY PARTIES HAVE BEEN PROVIDED WITH CHAPTER 40 NOTICE OF THE NEW ISSUES AND TO FINALIZE ALL THE ACTUAL CHAPTER 40 NOTICES [REDACTED] | 1.20  | 210.00 |
| 03/28/2016 | PCB | L390 | A103 | DRAFT/REVISE LETTER TO COUNSEL FOR PLAINTIFF RE: DISCUSSION OF THE LACK OF NECESSARY INFORMATION IN THE NEW CHAPTER 40 NOTICE.                                                                     | 0.20  | 35.00  |
|            | PCB | L240 | A104 | REVIEW/ANALYZE STATUTORY PROVISIONS IN CONJUNCTION WITH PLAINTIFF'S NEW CHAPTER 40 NOTICE [REDACTED]                                                                                               | 0.70  | 122.50 |
| 03/29/2016 | PCB | L340 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: ISSUES OVER THE WATER TESTING THAT IS BEING PERFORMED WITHOUT PROPER NOTICE.                                                          | 0.40  | 70.00  |
|            | PCB | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                               | 0.20  | 35.00  |
|            | PCB | L340 | A104 | REVIEW/ANALYZE EMAIL FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                       | 0.10  | 17.50  |
| 03/30/2016 | PCB | L190 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR CULLIGAN AND PROVIDE REQUESTED DOCUMENTS IN RESPONSE TO REQUEST FOR SAME.                                                                                    | 0.10  | 17.50  |
|            | PCB | L190 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH JORGE RAMIREZ (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                                                       | 0.20  | 35.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE TO FLIPPINS TRENCHING.                                                                                                                              | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO INSULPRO PROJECTS, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                            | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                             | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                 | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO SIERRA GLASS & MIRROR, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                  | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO TEXAS WALL SYSTEMS, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                     | 0.20  | 24.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO VICTAULIC, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.                                                                                              | 0.20  | 24.00  |

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| | | | | | Hours | Amount |
|------------|-----|------|------|--|-------|--------|
| | JBV | L110 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC, RE: [REDACTED] | | |
| | | | | | 0.20 | 24.00 |
| | JBV | L110 | A103 | DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO AQUAMATIC, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L110 | A103 | DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO BOMBARD MECHANICAL, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| 04/01/2016 | DMC | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH TOM DANK OF AQUAMATIC COVER SYSTEMS RE: [REDACTED] | | |
| | | | | | 0.10 | 17.50 |
| | DMC | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) (ADDITIONAL COMMUNICATION) WITH TOM DANK OF AQUAMATIC POOL SYSTEMS RE: [REDACTED] | | |
| | | | | | 0.10 | 17.50 |
| 04/06/2016 | JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR ANY COMPANY RELEVANT TO AQUAMATIC AND VALVES, RE: [REDACTED] | | |
| | | | | | 0.20 | 24.00 |
| | JBV | L320 | A103 | DRAFT/REVISE NRS CHAPTER 40 CORRESPONDENCE TO CENTRO, INC. DUE TO ITS RELATION TO AQUAMATIC VALVES, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN CONSTRUCTION, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER DEVELOPMENT, RE: [REDACTED] | | |

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|            |     |      |      |                                                                                                                                                                            | Hours | Amount |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
| 04/07/2016 | PCB | L190 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC AND PREPARE EMAIL IN RESPONSE TO SAME                                                                                      |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 17.50  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON AQUAMATIC COVER SYSTEMS VIA CERTIFIED MAIL, RE:                                      |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON BOMBARD MECHANICAL VIA CERTIFIED MAIL, RE:                                           |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN PURE WATER/CULLIGAN WATER CONDITIONING OF LAS VEGAS VIA CERTIFIED MAIL, RE: |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN WATER COMPANY OF NEVADA VIA CERTIFIED MAIL, RE:                             |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S TRENCHING VIA CERTIFIED MAIL, RE:                                          |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON OLD CASTLE BUILDING ENVELOPE VIA CERTIFIED MAIL, RE:                                 |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS CHAPTER 40 CORRESPONDENCE SERVED ON VICTAULIC VIA CERTIFIED MAIL, RE:                                                    |       |        |
|            |     |      |      |                                                                                                                                                                            | 0.10  | 12.00  |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RETURNED INITIAL NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON                                                                              |       |        |

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| | | | | | Hours | Amount |
|------------|------|------|------|---|-------|--------|
| | | | | SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE:
[REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S TRENCHING VIA CERTIFIED MAIL, RE: [REDACTED] | 0.10 | 12.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS CHAPTER 40 CORRESPONDENCE SERVED ON INSULPRO PROJECTS VIA CERTIFIED MAIL, RE: [REDACTED] | 0.10 | 12.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| JBV | L320 | A104 | | REVIEW/ANALYZE RETURNED SECOND NRS CHAPTER 40 CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: [REDACTED] | 0.10 | 12.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| JBV | L320 | A103 | | DRAFT/REVISE UPDATE INFORMATION INTO CLIENTS' SUMMARY OF NRS CHAPTER 40 CORRESPONDENCE (11 TOTAL), RE: [REDACTED] | 0.10 | 12.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | 0.30 | 36.00 |
| 04/12/2016 | DMC | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO AQUAMATIC RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | 0.30 | 52.50 |
| DMC | L120 | A109 | | APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (ARCHITECT) RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| PCB | L130 | A109 | | APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | 0.40 | 70.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| PCB | L130 | A104 | | REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT (MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS [REDACTED] | 0.40 | 70.00 |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | 0.40 | 70.00 |
| 04/13/2016 | JBV | L320 | A104 | REVIEW/ANALYZE SECRETARY OF STATE CORPORATE INFORMATION FOR FORD CONTRACTING, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | 0.20 | 24.00 |

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | JBV | L320 | A103 | DRAFT/REVISE NRS CHAPTER 40 CORRESPONDENCE TO FORD CONTRACTING, RE: [REDACTED] | | |
| | | | | | 0.20 | 24.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER DEVELOPMENT/PANORAMA TOWERS I AND II, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN CONSTRUCTION, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| 04/14/2016 | PCB | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR GENERAL CONTRACTOR RE: [REDACTED] | | |
| | | | | | 0.10 | 17.50 |
| 04/22/2016 | PCB | L120 | A101 | PLAN AND PREPARE FOR NEXT STEPS OF DEFENSE INCLUDING [REDACTED] | | |
| | | | | | 0.50 | 87.50 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE BUILDING ENVELOPE, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE, INC., RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC., RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A103 | DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: [REDACTED] | | |
| | | | | | 0.10 | 12.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE: [REDACTED] | | |

| | | | | Hours | Amount |
|-----|------|------|--|-------|--------|
| | | | THE CLARK COUNTY BUILDING DEPARTMENT RE: | | |
| | | | [REDACTED] | | |
| DMC | L120 | A104 | REVIEW/ANALYZE CLIENTS' OCIP MANUAL [REDACTED] | 0.10 | 17.50 |
| | | | [REDACTED] | | |
| DMC | L120 | A104 | [REDACTED] (38 PAGES) | 0.40 | 70.00 |
| | | | 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) | 0.50 | 87.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT HALLIER | | |
| | | | PROPERTIES IN PREPARATION FOR DRAFTING INITIAL | | |
| | | | STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) | | |
| | | | (TIME SPLIT BETWEEN CLIENTS) | 0.50 | 87.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM MARTIN LITTLE | | |
| | | | (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| DMC | L120 | A104 | REVIEW/ANALYZE BANKRUPTCY PETITION FOR | 0.10 | 17.50 |
| | | | CLIENT/INSURED PANORAMA TOWERS II, LLC [REDACTED] | | |
| | | | [REDACTED] | | |
| DMC | L120 | A104 | REVIEW/ANALYZE PRIOR SETTLEMENT AGREEMENT AND | 0.20 | 35.00 |
| | | | 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 [REDACTED] | | |
| | | | [REDACTED] | | |
| DMC | L120 | A103 | DRAFT/REVISE (BEGIN) INITIAL REPORT TO CARRIERS RE: | 0.40 | 70.00 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | 0.30 | 52.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | 0.30 | 52.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | 0.90 | 157.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | 0.70 | 122.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | 0.60 | 105.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: | | |
| | | | [REDACTED] | | |

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|------------|-----|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | RAB | L110 | A104                                                                                                                                                                                           | 0.50  | 87.50  |
|            |     |      | REVIEW/ANALYZE LITIGATION SERVICES DOCUMENTS, RE:<br>DEPOSITORY INDEX DOCUMENTS                                                                                                                |       |        |
|            | RAB | L110 | A103                                                                                                                                                                                           | 0.20  | 24.00  |
|            |     |      | DRAFT/REVISE EMAIL TO LITIGATION SERVICES, RE:                                                                                                                                                 |       |        |
|            | RAB | L110 | A104                                                                                                                                                                                           | 0.10  | 12.00  |
|            |     |      | REVIEW/ANALYZE RESPONSE EMAIL FROM LITIGATION<br>SERVICES, RE:                                                                                                                                 |       |        |
|            | RAB | L110 | A103                                                                                                                                                                                           | 0.10  | 12.00  |
|            |     |      | DRAFT/REVISE RESPONSE EMAIL TO LITIGATION SERVICES,<br>RE:                                                                                                                                     |       |        |
|            | RAB | L110 | A104                                                                                                                                                                                           | 0.10  | 12.00  |
|            |     |      | REVIEW/ANALYZE DOCUMENTS FROM LITIGATION SERVICES,<br>RE:                                                                                                                                      |       |        |
| 05/03/2016 | RAB | L110 | A108                                                                                                                                                                                           | 0.20  | 24.00  |
|            |     |      | COMMUNICATE (OTHER EXTERNAL) WITH BANKRUPTCY<br>ATTORNEY JOSHUA HOUMAND, RE:                                                                                                                   |       |        |
| 05/13/2016 | DMC | L120 | A103                                                                                                                                                                                           | 0.20  | 35.00  |
|            |     |      | DRAFT/REVISE E-MAIL TO JACOB HOUMAND (BANKRUPTCY<br>COUNSEL FOR PANORAMA TOWERS II, LLC) RE:                                                                                                   |       |        |
|            | PCB | L120 | A104                                                                                                                                                                                           | 0.50  | 87.50  |
|            |     |      | REVIEW/ANALYZE PORTIONS OF AB 125                                                                                                                                                              |       |        |
| 05/16/2016 | DMC | L250 | A104                                                                                                                                                                                           | 0.90  | 157.50 |
|            |     |      |                                                                                                                                                                                                |       |        |
| 05/20/2016 | RAB | L110 | A104                                                                                                                                                                                           | 0.80  | 96.00  |
|            |     |      | REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT<br>DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY,<br>CERTIFICATE OF COMPLETION, AND FINAL INSPECTION<br>DOCUMENTS RELATING TO 4525 DEAN MARTIN DRIVE |       |        |
|            | RAB | L110 | A104                                                                                                                                                                                           | 0.70  | 84.00  |
|            |     |      | REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT<br>DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY,<br>CERTIFICATE OF COMPLETION, AND FINAL INSPECTION<br>DOCUMENTS RELATING TO 4575 DEAN MARTIN DRIV  |       |        |

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|------------|-----|------|------|---|-------|----------|
| 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) | 1.30 | 227.50 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: CLIENTS' DETAILED RESPONSE TO EACH OF THE ALLEGED DEFECTS INCLUDING THE BASIS FOR DISCLAIMING ANY LIABILITY (5 OF 9 PAGES) | 1.60 | 280.00 |
| | DMC | L330 | A101 | PLAN AND PREPARE DEPOSITION OF ROSS MORRISSEY (THE ASSOCIATION BUILDING ENGINEER) RE: REVIEW PHOTOS OF ALLEGED PLUGGED PODIUM DECK DRAIN TAKEN BY MR. MORRISSEY ON 1/4/16 [P0218895 - P0218898] | 0.10 | 17.50 |
| 05/24/2016 | PCB | L250 | A103 | [REDACTED] | 0.30 | 52.50 |
| | | | | For Current Services Rendered | 55.90 | 8,088.50 |
| | | | | Total Non-billable Hours | 1.40 | |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|--------------------|--------------|--------------|-------------|--------------|
| Peter C. Brown | PARTNER | 13.00 | \$175.00 | \$2,275.00 |
| Jennifer Vela | PARALEGAL | 16.40 | 120.00 | 1,968.00 |
| Lexi Kim | PARALEGAL | 10.50 | 120.00 | 1,260.00 |
| Darlene M. Cartier | ASSOCIATE | 12.10 | 175.00 | 2,117.50 |
| Rachel A. Bounds | PARALEGAL | 3.90 | 120.00 | 468.00 |

Expenses

| | | | | |
|------------|------|------|--|-------------------|
| 03/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR MARCH 2016 (1927 PAGES AT .08/PAGE) | 154.16 |
| 04/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR APRIL 2016 (141 PAGES AT .08/PAGE) | 11.28 |
| 05/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR MAY 2016 (1141 PAGES AT .08/PAGE) | 91.28 |
| | | | Total Expenses | 256.72 |
| | | | Total Current Work | 8,345.22 |
| | | | Balance Due | <u>\$8,345.22</u> |

Task Code Summary

| | <u>Fees</u> | <u>Expenses</u> |
|--|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 256.72 |
| L110 FACT INVESTIGATION/DEVELOPMENT | 1942.00 | 0.00 |
| L120 ANALYSIS/STRATEGY | 2187.50 | 0.00 |
| L130 EXPERTS/CONSULTANTS | 357.50 | 0.00 |
| L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 70.00 | 0.00 |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 4,557.00 | 256.72 |

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|      |                                       | <u>Fees</u> | <u>Expenses</u> |
|------|---------------------------------------|-------------|-----------------|
| L240 | DISPOSITIVE MOTIONS                   | 122.50      | 0.00            |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS | 420.00      | 0.00            |
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS       | 542.50      | 0.00            |
| L320 | DOCUMENT PRODUCTION                   | 1764.00     | 0.00            |
| L330 | DEPOSITIONS                           | 17.50       | 0.00            |
| L340 | EXPERT DISCOVERY                      | 315.00      | 0.00            |
| L390 | OTHER DISCOVERY                       | 892.50      | 0.00            |
| L300 | DISCOVERY                             | 2,989.00    | 0.00            |

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

0023

AA2732

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

TAX ID # 33-0747275

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

Attn: Sherilyn Brydon

Panorama Tower II  
5143220827859X-A  
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| | | | | <u>Fees</u> | | Hours | Amount |
|------------|-----|------|------|--|--|-------|--------|
| 09/14/2016 | DMC | L120 | A104 | REVIEW/ANALYZE REVIEW OCIP ENROLLMENT LIST AND OTHER NAMED RESPONDENTS THE ASSOCIATION SERVED WITH CHAPTER 40 NOTICES TO DETERMINE WHICH RESPONDENTS ARE ENROLLED IN THE OCIP AND RELEASED FOR PRIOR CLAIMS AND THOSE THAT ARE NOT, [REDACTED] | | | |
| | | | | [REDACTED] | | | |
| | | | | [REDACTED] | | | |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED] | | 0.15 | 24.75 |
| | | | | [REDACTED] | | | |
| | | | | [REDACTED] | | 0.05 | 8.25 |
| 09/15/2016 | RAB | L140 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENT RECORDS, RE: INFORMATION RELATING TO FINAL BUILDING INSPECTION REPORTS. | | 0.10 | 9.50 |
| | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT EMP CONSULTANTS, RE: [REDACTED] | | | |
| | | | | [REDACTED] | | 0.10 | 9.50 |
| | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | | 0.10 | 9.50 |
| | RAB | L130 | A103 | DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | | | |
| | | | | [REDACTED] | | 0.10 | 9.50 |
| | DMC | L150 | A103 | DRAFT/REVISE PHASE I LITIGATION BUDGET PURSUANT TO REQUEST BY CARRIER | | 0.40 | 66.00 |
| | PCB | L120 | A104 | REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION [REDACTED] | | | |
| | | | | [REDACTED] | | | |
| | | | | [REDACTED] | | | |
| | | | | (TIME SPLIT WITH FILE #1287.551 - | | | |

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|            |     |      |      |                                                                                                                                                                             | Hours | Amount |
|------------|-----|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | "PANORAMA TOWER I").                                                                                                                                                        | 0.40  | 74.00  |
| 09/16/2016 | RAB | L140 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENTS INSPECTION DEPARTMENT, RE: FINAL INSPECTION REPORTS.                                                | 0.20  | 19.00  |
|            | RAB | L140 | A103 | DRAFT/REVISE MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: INFORMATION RELATING TO FINAL INSPECTION REPORTS.                                            | 0.10  | 9.50   |
|            | RAB | L130 | A104 | REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT MADSEN, KNEPPERS & ASSOCIATES, INC., RE: [REDACTED]                                                                       | 0.10  | 9.50   |
| 09/19/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]                                                                                                        |       |        |
|            |     |      |      | [REDACTED] TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA I" - 1287.551).                                                                                              | 0.10  | 18.50  |
|            | PCB | L250 | A103 | DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF RE: [REDACTED]                                                                                                         |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER I" - 1287.581).                                                                             | 0.40  | 74.00  |
|            | PCB | L160 | A101 | PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]                                                                                                           |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER I" - 1287.551).                                                                                       | 0.50  | 92.50  |
|            | DMC | L160 | A104 | REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: [REDACTED]                                                                                                   |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                       | 0.05  | 8.25   |
| 09/21/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]                                                                                                        |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558)(NO TRAVEL TIME INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE). | 0.60  | 111.00 |
| 09/22/2016 | PCB | L120 | A101 | PLAN AND PREPARE FOR (CONTINUE) FOR NEXT WEEK'S                                                                                                                             |       |        |



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| | | | | | Hours | Amount |
|------------|------|------|------|---|-------|--------|
| | | | | MEDIATION RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER | | |
| | | | | FILE IN SAME CASE - "PANORAMA TOWER I" - 1287.551). | 0.40 | 74.00 |
| RAB | L320 | A104 | | REVIEW/ANALYZE DOCUMENTS FOR UPCOMING CHAPTER 40 | | |
| | | | | MEDIATION, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| RAB | L320 | A103 | | DRAFT/REVISE EMAIL TO SHANE FROM HOLO DISCOVERY | 0.20 | 19.00 |
| | | | | SOLUTIONS, RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 9.50 |
| 09/24/2016 | PCB | L120 | A101 | PLAN AND PREPARE FOR TODAY'S MEETING WITH CLIENT'S | | |
| | | | | ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING | | |
| | | | | TOGETHER THE POWERPOINT FOR THE MEDIATION | | |
| | | | | (HOLODOC) RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE | | |
| | | | | - "PANORAMA TOWER I" - 1287.551). | 0.70 | 129.50 |
| PCB | L120 | A109 | | APPEAR FOR/ATTEND MEETING WITH CLIENT'S | | |
| | | | | ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING | | |
| | | | | TOGETHER THE POWERPOINT FOR THE MEDIATION | | |
| | | | | (HOLODOC) RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - | | |
| | | | | "PANORAMA TOWER I" - 1287.551)(NO TRAVEL TIME INCLUDED | | |
| | | | | IN THIS ENTRY SINCE IT TOOK PLACE AT BWB&O'S OFFICE). | 1.20 | 222.00 |
| 09/25/2016 | PCB | L120 | A103 | DRAFT/REVISE (BEGIN) MEDIATION "TALKING POINTS" | | |
| | | | | OUTLINE [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER FILE | | |
| | | | | IN SAME CASE - "PANORAMA TOWER I" - 1287.551). | 1.10 | 203.50 |
| PCB | L160 | A101 | | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S | | |
| | | | | MEDIATION RE: [REDACTED] | | |
| | | | | [REDACTED] TIME SPLIT WITH OTHER FILE IN SAME CASE - | | |
| | | | | "PANORAMA I" - 1287.581)(NO TRAVEL TIME INCLUDED IN THIS | | |
| | | | | ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S | | |
| | | | | OFFICE). | 2.10 | 388.50 |
| PCB | L160 | A101 | | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S | | |
| | | | | MEDIATION RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA I" - | | |
| | | | | 1287.551). | 0.40 | 74.00 |
| 09/26/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR TODAY'S MEDIATION | | |
| | | | | RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER FILE IN | | |

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|            |      |      |                                                                                                                                                                                      | Hours                                                                                                    | Amount |  |
|------------|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|--------|--|
|            |      |      | SAME CASE - 1287.581 - PANORAMA TOWER I").                                                                                                                                           | 0.40                                                                                                     | 74.00  |  |
| PCB        | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.581 - "PANORAMA TOWER I")(NO TRAVEL TIME INCLUDED IN THIS ENTRY).                                        | 2.00                                                                                                     | 370.00 |  |
| PCB        | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - "PANORAMA TOWER I").                                                  | 0.50                                                                                                     | n/c    |  |
| DMC        | L160 | A109 | TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)                                                                    | 0.30                                                                                                     | n/c    |  |
| DMC        | L160 | A109 | APPEAR FOR/ATTEND CHAPTER 40 MEDIATION (ATTENDANCE BY DMC AND PCB APPROVED BY CARRIER)(TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                           | 2.00                                                                                                     | 330.00 |  |
| DMC        | L160 | A109 | RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST)                                                  | 0.40                                                                                                     | n/c    |  |
| DMC        | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]                                                                                                               |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
| DMC        | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]                                                                                                     | 0.10                                                                                                     | 16.50  |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
| DMC        | L120 | A103 | DRAFT/REVISE E-MAIL TO SHARILYN BRYDON OF ESIS (CARRIER) RE: [REDACTED]                                                                                                              | 0.10                                                                                                     | 16.50  |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
| DMC        | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: ADD BREACH OF CONTRACT CLAIM FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10                                                                                                     | 16.50  |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           | 0.50                                                                                                     | 82.50  |  |
| 09/27/2016 | DMC  | L120 | A104                                                                                                                                                                                 | REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED] |        |  |
|            |      |      | [REDACTED]                                                                                                                                                                           |                                                                                                          |        |  |
|            |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                      | 0.05                                                                                                     | 8.25   |  |
| DMC        | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]                                                                   |                                                                                                          |        |  |
|            |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                      | 0.05                                                                                                     | 8.25   |  |
| DMC        | L120 | A103 | DRAFT/REVISE FOLLOW UP E-MAIL TO NICOLE CASTRO OF ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]                                                                       |                                                                                                          |        |  |
|            |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                      | 0.05                                                                                                     | 8.25   |  |
| DMC        | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM NICOLE CASTRO OF                                                                                                                                          |                                                                                                          |        |  |

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| | | | | | Hours | Amount |
|-----|------|------|--|---|-------|--------|
| | | | | ENDURANCE INSURANCE (CLIENTS' EXCESS CARRIER) RE: | | |
| | | | | (TIME SPLIT WITH OTHER | | |
| DMC | L210 | A103 | | CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05 | 8.25 |
| | | | | DRAFT/REVISE SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | GENERAL ALLEGATIONS REGARDING THE TERMS OF THE | | |
| | | | | SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION | | |
| | | | | REGARDING THE ASSOCIATION'S AGREEMENT TO DEFEND | | |
| | | | | AND INDEMNIFY CLIENTS REGARDING FUTURE ACTIONS | | |
| | | | | RELATING TO RELEASED CLAIMS (TIME SPLIT WITH OTHER | | |
| DMC | L210 | A103 | | CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| | | | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | GENERAL ALLEGATIONS REGARDING THE NEW | | |
| | | | | REQUIREMENTS UNDER AB 125 REGARDING EVIDENCE OF | | |
| | | | | PHYSICAL DAMAGE TO PROPERTY AND THAT CHAPTER 40 | | |
| | | | | NOTICES MUST IDENTIFY IN SPECIFIC DETAIL EACH DEFECT, | | |
| | | | | DAMAGE AND INJURY, INCLUDING THE LOCATION OF THE | | |
| | | | | DEFECT, DAMAGE AND INJURY (TIME SPLIT WITH OTHER | | |
| DMC | L210 | A103 | | CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.40 | 66.00 |
| | | | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | GENERAL ALLEGATIONS REGARDING THE CC&RS, INCLUDING | | |
| | | | | UNIT BOUNDARIES, DEFINITION OF COMMON ELEMENTS AND | | |
| | | | | UNIT OWNER MAINTENANCE RESPONSIBILITIES ((TIME SPLIT | | |
| | | | | WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S | | |
| | | | | REQUEST) | 0.40 | 66.00 |
| DMC | L210 | A103 | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | GENERAL ALLEGATIONS REGARDING THE SETTLEMENT | | |
| | | | | AGREEMENT IN THE PRIOR LITIGATION RELATING TO THE | | |
| | | | | ASSOCIATION'S OBLIGATIONS TO DEFEND AND INDEMNIFY | | |
| | | | | CLIENTS IN ANY SUBSEQUENT ACTION INVOLVING THE | | |
| | | | | SETTLED AND RELEASE CLAIMS ((TIME SPLIT WITH OTHER | | |
| DMC | L210 | A103 | | CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.20 | 33.00 |
| | | | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | FIRST CLAIM FOR RELIEF REGARDING WHETHER THE | | |
| | | | | ASSOCIATION'S CLAIMS ARE ALL TIME BARRED BY AB 125 | | |
| | | | | AND/OR WHETHER THE ASSOCIATION HAS STANDING TO | | |
| | | | | BRING CLAIMS INVOLVING WINDOWS (TIME SPLIT WITH | | |
| | | | | OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: | | |
| | | | | THIRD CLAIM FOR RELIEF REGARDING THE ASSOCIATION'S | | |
| | | | | FAILURE TO COMPLY WITH CHAPTER 40 BY NOT SPECIFYING | | |
| | | | | IN DETAIL EACH ALLEGED ALLEGED DEFECT, DAMAGE AND | | |
| | | | | INJURY, INCLUDING THE EXACT LOCATION OF EACH DEFECT | | |
| | | | | DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM | | |
| | | | | NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10 | 16.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A | | |
| | | | | FIFTH CLAIM FOR RELIEF FOR BREACH OF CONTRACT FOR | | |
| | | | | THE ASSOCIATION'S BREACH OF THE SETTLEMENT | | |
| | | | | AGREEMENT IN THE PRIOR LITIGATION (TIME SPLIT WITH | | |
| | | | | OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.30 | 49.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A | | |
| | | | | SIXTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF | | |
| | | | | REGARDING THE ASSOCIATION'S DUTY TO DEFEND CLIENTS | | |
| | | | | REGARDING THE NEWLY ALLEGED CLAIMS THAT WERE | | |
| | | | | RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH | | |

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|     |      |      |                                                                                                                                                                                                                                                                                                                                                                                     | Hours | Amount |
|-----|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| DMC | L210 | A103 | OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)<br>DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A<br>SEVENTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF<br>REGARDING THE ASSOCIATION'S DUTY TO INDEMNIFY<br>CLIENTS REGARDING THE NEWLY ALLEGED CLAIMS THAT<br>WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.50  | 82.50  |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF<br>ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]                                                                                                                                                                                                                                                       | 0.50  | 82.50  |
| DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER<br>OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE<br>PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                    | 0.05  | 8.25   |
| DMC | L250 | A103 | DRAFT/REVISE NOTICE OF PRIOR RELATED LITIGATION AND<br>EX PARTE REQUEST FOR ASSIGNMENT TO THE HONORABLE<br>SUSAN JOHNSON (TIME SPLIT WITH OTHER CLAIM NO./FILE<br>PURSUANT TO CARRIER'S REQUEST) (NOTICE/REQUEST<br>APPROVED BY CARRIER)                                                                                                                                            | 0.05  | 8.25   |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL<br>COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                              | 0.90  | 148.50 |
| DMC | L250 | A104 | REVIEW/ANALYZE INITIAL APPEARANCE FEE DISCLOSURE<br>FOR COMPLETENESS AND ACCURACY AND APPROVE AND<br>EXECUTE SAME IN PREPARATION FOR FILING CLIENTS'<br>COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                   | 0.05  | 8.25   |
| DMC | L250 | A104 | REVIEW/ANALYZE CLIENTS' DEMAND FOR JURY TRIAL FOR<br>COMPLETENESS AND ACCURACY AND APPROVE AND<br>EXECUTE SAME IN PREPARATION FOR FILING CLIENTS'<br>COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                      | 0.05  | 8.25   |
| DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM MARTIN LITTLE<br>(PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                      | 0.05  | 8.25   |
| DMC | L120 | A103 | DRAFT/REVISE DETAILED RESPONSE TO E-MAIL FROM DANIEL<br>BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH                                                                                                                                                                                                                       | 0.20  | 33.00  |

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| | | | | | Hours | Amount |
|------------|-----|------|------|---|--|--|
| | PCB | L210 | A103 | 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 I"). | 0.40

0.10 | 66.00

18.50 |
| 09/28/2016 | RAB | L320 | A104 | REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40
MEDIATION, RE: POWER POINT PRESENTATION INFORMATION
IN PREPARATION SENDING TO PARTIES IN THE CASE AS PER
REQUESTED BY ATTORNEY. (TIME IS SPLIT WITH THE OTHER
FILE 1287.551) | 0.30 | 28.50 |
| | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO ALL COUNSEL, RE: INFORMATION
RELATING TO THE LINK OF THE POWER POINT
PRESENTATION. (TIME IS SPLIT WITH THE OTHER FILE
1287.551) | 0.10 | 9.50 |
| | RAB | L320 | A103 | DRAFT/REVISE (CONTINUE) MEMORANDUM OF CALL WITH THE
CLARK COUNTY BUILDING DEPARTMENT, RE: [REDACTED]
[REDACTED] (TIME IS SPLIT WITH THE OTHER FILE 1287.551) | 0.10 | 9.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF
ENDURANCE (EXCESS CARRIER) RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE INITIAL LITIGATION BUDGET TO INCLUDE
ADDITIONAL MOTION PRACTICE PURSUANT TO REQUEST BY
CARRIER AT THE CHAPTER 40 MEDIATION (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER
OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) AND
RAMIE MORALES (CARRIER'S COVERAGE COUNSEL) RE: [REDACTED]
[REDACTED] (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L160 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY
THOMPSON (COUNSEL FOR OLD CASTLE) RE: OUTCOME OF
CHAPTER 40 MEDIATION, INCLUDING WHETHER THE
ASSOCIATION MADE ANY SETTLEMENT DEMAND AND
WHETHER ANY SETTLEMENT WAS REACHED (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF | | |

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 ~~~SEE NOTES~~~

|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                       | Hours | Amount |
|------------|-----|------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      | ENDURANCE (EXCESS CARRIER) RE: [REDACTED]                                                                                                                                                                                                                                                                                                                                             |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                 | 0.05  | 8.25   |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED]                                                                                                                                                                                                                                                                                         |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                 | 0.05  | 8.25   |
| 09/29/2016 | DMC | L210 | A104 | REVIEW/ANALYZE SUMMONS TO THE ASSOCIATION FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME AS COUNSEL ON BEHALF OF CLIENTS, IN PREPARATION FOR SERVICE ON THE ASSOCIATION WITH CLIENT'S COMPLAINT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                | 0.05  | 8.25   |
|            | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS (CARRIER) RE: CASE STATUS UPDATE INCLUDING COMPLAINT AND CAUSES OF ACTION ALLEGED IN THE COMPLAINT, AND REQUEST FOR INFORMATION FROM ENDURANCE (EXCESS CARRIER) REGARDING HOW ACE ALLOCATED THE SETTLEMENT IN THE PRIOR LITIGATION BETWEEN TOWER 1 AND TOWER 2 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)              | 0.05  | 8.25   |
|            | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRYDON OF ESIS (CARRIER) RE: CASE STATUS UPDATE INCLUDING COMPLAINT AND CAUSES OF ACTION ALLEGED IN THE COMPLAINT, AND REQUEST FOR INFORMATION FROM ENDURANCE (EXCESS CARRIER) REGARDING HOW ACE ALLOCATED THE SETTLEMENT IN THE PRIOR LITIGATION BETWEEN TOWER 1 AND TOWER 2 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 8.25   |
| 10/03/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                | 0.05  | 8.25   |
|            | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION INCLUDING SETTLEMENT DISCUSSIONS WITH THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                | 0.05  | 8.25   |
|            | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                                                                                                                                                                                                                                              |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                 | 0.05  | 8.25   |
| 10/17/2016 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                                                                                                                                                                                                                                                  |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                 |       |        |

Panorama Tower II  
 5143220827859X-A  
 PANORAMA TOWER II  
 ~~~SEE NOTES~~~

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|----------|
| | | | | CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA
(CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.05 | 8.25 |
| 10/21/2016 | RAB | L320 | A104 | REVIEW/ANALYZE POWER POINT PRESENTATION
DOCUMENTS, RE: MEDIATION DOCUMENTS IN PREPARATION
FOR CORRESPONDING WITH PLAINTIFF'S COUNSEL. | 0.10 | 9.50 |
| | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO PLAINTIFF'S COUNSEL FRANCIS
LYNCH, RE: POWER POINT PRESENTATION DOCUMENTS. | 0.10 | 9.50 |
| 10/26/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE:
[REDACTED] (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER
(CARRIER) RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 11/08/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM TRACY JIN OF MKA (CLIENTS'
ARCHITECTURAL EXPERT) RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 11/10/2016 | RAB | L320 | A104 | REVIEW/ANALYZE OUR CLIENT'S PLEADINGS, RE: E-FILED
COMPLAINT IN PREPARATION FOR CORRESPONDING WITH
DEFENDANT OLDCASTLE BUILDING ENVELOPE FKA TEXAS
WALL SYSTEMS. | 0.10 | 9.50 |
| | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO DEFENDANTS OLDCASTLE BUILDING
ENVELOPE FKA TEXAS WALL SYSTEMS, RE: INFORMATION
RELATING TO THE COMPLAINT. | 0.10 | 9.50 |
| 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 ACTION TO THE HOA'S CARRIER, AND THE TIMING
OF HIS CLIENT'S FILING OF A RESPONSIVE PLEADING (TIME
SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA I -
1287.551). | 0.20 | 37.00 |
| | | | | For Current Services Rendered | 21.70 | 3,652.50 |
| | | | | Total Non-billable Hours | 1.20 | |

Timekeeper
 Peter C. Brown

Recapitulation
 Title
 PARTNER

Hours
 10.60

Rate
 \$185.00

Total
 \$1,961.00

0032

AA2741

Panorama Tower II
5143220827859X-A
PANORAMA TOWER II
~~~SEE NOTES~~~

| <u>Timekeeper</u>  | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|--------------------|--------------|--------------|-------------|--------------|
| Darlene M. Cartier | ASSOCIATE    | 9.10         | 165.00      | 1,501.50     |
| Rachel A. Bounds   | PARALEGAL    | 2.00         | 95.00       | 190.00       |

Expenses

|            |      |      |                                                                                                                                               |                   |
|------------|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| 09/26/2016 | L100 | E109 | LOCAL TRAVEL (8799) DARLENE M. CARTIER (29.2 MILES AT \$ .56/MILE FOR MEDIATION) SPLIT WITH 1287.551                                          | 8.18              |
| 09/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR SEPTEMBER 2016 (86 PAGES 0.08/PAGE)                                                                                    | 6.88              |
| 11/03/2016 | L100 | E123 | OTHER PROFESSIONALS (98118) HOLO DISCOVERY (DEPOSITORY SERVICES) (INVOICE NO. 1457) (SPLIT BETWEEN 1287.551 AND 1287.558) (TRIAL PREPARATION) | 693.75            |
|            |      |      | Total Expenses                                                                                                                                | 708.81            |
|            |      |      | Total Current Work                                                                                                                            | 4,361.31          |
|            |      |      | Balance Due                                                                                                                                   | <u>\$4,361.31</u> |

Task Code Summary

|                                                          | <u>Fees</u> | <u>Expenses</u> |
|----------------------------------------------------------|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 0.00        | 708.81          |
| L120 ANALYSIS/STRATEGY                                   | 1277.75     | 0.00            |
| L130 EXPERTS/CONSULTANTS                                 | 38.00       | 0.00            |
| L140 DOCUMENT/FILE MANAGEMENT                            | 38.00       | 0.00            |
| L150 BUDGETING                                           | 66.00       | 0.00            |
| L160 SETTLEMENT/NON-BINDING ADR                          | 1304.50     | 0.00            |
| L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 37.00       | 0.00            |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 2,761.25    | 708.81          |
| L210 PLEADINGS                                           | 538.25      | 0.00            |
| L250 OTHER WRITTEN MOTIONS AND SUBMISSIONS               | 239.00      | 0.00            |
| L200 PRE-TRIAL PLEADINGS AND MOTIONS                     | 777.25      | 0.00            |
| L320 DOCUMENT PRODUCTION                                 | 114.00      | 0.00            |
| L300 DISCOVERY                                           | 114.00      | 0.00            |

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



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

TAX ID # 33-0747275

CHUBB INSURANCE  
525 W. MONROE STREET  
CHICAGO IL 60661

Attn: Jeff Ganzer

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

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August 31, 2016
Account No: 1287-5511M
Statement No: 2

| <u>Fees</u> | | | | | Hours | Amount |
|-------------|-----|------|------|---|-------|--------|
| 06/15/2016 | JBV | L320 | A107 | COMMUNICATE WITH COUNSEL FOR CULLIGAN WATER, RE:
[REDACTED] | 0.20 | 19.00 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL
FOR CULLIGAN) RE: [REDACTED] | 0.10 | 16.50 |
| 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 | 0.10 | 16.50 |
| 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 | 0.10 | 16.50 |
| 06/22/2016 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR
CULLIGAN) RE: CASE 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 | 0.10 | 16.50 |
| 06/23/2016 | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON
(COUNSEL FOR CULLIGAN) RE: CASE STATUS UPDATE | 0.10 | 16.50 |
| 06/29/2016 | PCB | L120 | A103 | DRAFT/REVISE (FINALIZE) FIRST SUIT REPORT RE:
[REDACTED] | 1.20 | 222.00 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:
[REDACTED] | 1.20 | 198.00 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:
[REDACTED] | | |

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AA2743

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

|     |      |      |                                                                                                                                                                              | Hours | Amount |
|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|     |      |      |                                                                                                                                                                              | 0.90  | 148.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.20  | 33.00  |
| DMC | L120 | A104 | REVIEW/ANALYZE BRIEF RESEARCH RE: EDWARD SONG<br>AND SCOTT WILLIAMS TO DETERMINE THEIR BACKGROUND<br>AND EXPERIENCE IN PREPARATION FOR DRAFTING INITIAL<br>REPORT TO CARRIER | 0.30  | 49.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.40  | 66.00  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.20  | 33.00  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.70  | 115.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.70  | 115.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 1.20  | 198.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.90  | 148.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.80  | 132.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.60  | 99.00  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.20  | 33.00  |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE:<br>[REDACTED]                                                                                                          | 0.10  | 16.50  |

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

| | | | | | Hours | Amount |
|------------|-----|------|------|--|-------|--------|
| | | | | | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: | | |
| | | | | | 0.90 | 148.50 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIER RE: | | |
| | | | | EVALUATION AND RECOMMENDATION : | | |
| | | | | | 0.10 | 16.50 |
| 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). | 0.20 | 37.00 |
| | 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. | 0.50 | 92.50 |
| | 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 | 0.50 | 82.50 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO WENDY JENSON | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM WENDY JENSON | | |
| | | | | | 0.10 | 16.50 |
| | 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, | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS | | |
| | | | | (CLAIMANT'S COUNSEL) RE: PRIOR COMMUNICATIONS WITH | | |
| | | | | SILVER STAR PLUMBING REGARDING CLAIMANT'S IMPROPER | | |
| | | | | CHAPTER 40 NOTICE AND THAT SILVER STAR NEVER | | |
| | | | | PERFORMED WORK ON THE PANORAMA TOWERS PROJECT, | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS | | |
| | | | | (CLAIMANT'S COUNSEL) TO BERNADETTE TIONGSON | | |
| | | | | (COUNSEL FOR SUBCONTRACTOR INSULPRO) RE: | | |
| | | | | PROPOSED STRATEGIES RELATING TO CHAPTER 40 | | |
| | | | | MEDIATION | 0.10 | 16.50 |
| | 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, | | |
| | | | | | 0.30 | 49.50 |

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: SUBCONTRACTORS CLAIMANT PLACED ON NOTICE OF THE CLAIM AND REQUEST FOR INFORMATION WE HAVE RELATING TO SAME, [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| | PCB | L110 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR HOA TO COUNSEL FOR SNP, REVIEW FILE MATERIALS, AND SEND EMAIL TO COUNSEL FOR SNP REGARDING THE NEW CHAPTER 40 CLAIM. | 0.20 | 37.00 |
| | PCB | L120 | A101 | PLAN AND PREPARE FOR UPCOMING MEDIATION [REDACTED] | | |
| | | | | [REDACTED] | 0.60 | 111.00 |
| 07/01/2016 | PCB | L190 | A103 | DRAFT/REVISE (FINALIZE) NOTICE OF CLAIM/TENDER OF DEFENSE TO ENDURANCE RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.20 | 37.00 |
| | PCB | L190 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR THE HOA TO COUNSEL FOR SOUTHERN NEVADA PAVING, [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 18.50 |
| | PCB | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR SOUTHERN NEVADA PAVING RE: CONTINUED DISCUSSION OF THE NOTICE HIS CLIENT RECEIVED FROM PLAINTIFF. | 0.30 | 55.50 |
| 07/14/2016 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] | 0.10 | 16.50 |
| | 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, [REDACTED] | | |
| | | | | [REDACTED] | 0.40 | 74.00 |
| 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 | 0.10 | 16.50 |
| | 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 | 0.10 | 16.50 |
| | DMC | L210 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S COMPLAINT AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION | 0.10 | 16.50 |
| | DMC | L210 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S AMENDED COMPLAINT | | |

| | | | | | Hours | Amount |
|------------|------|------|------|---|-------|--------|
| | | | | AGAINST CLIENTS IN THE PRIOR LITIGATION IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION | 0.10 | 16.50 |
| DMC | L210 | A102 | | RESEARCH DOCTRINES OF ISSUE PRECLUSION AND CLAIM PRECLUSION RE: CURRENT CASE LAW AND LEGAL AUTHORITY IN PREPARATION FOR DRAFTING CLIENTS' COMPLAINT FOR DECLARATORY RELIEF | 1.40 | 231.00 |
| DMC | L210 | A103 | | DRAFT/REVISE (BEGIN) COMPLAINT FOR DECLARATORY RELIEF RE: PARTIES | 0.60 | 99.00 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: JURISDICTION AND VENUE | 0.10 | 16.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) GENERAL ALLEGATIONS - APPLICABILITY OF AB 125 | 1.10 | 181.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) GENERAL ALLEGATIONS - CLAIMS RELATE TO OR ARISE OUT OF PRIOR SETTLED LITIGATION | 1.40 | 231.00 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FIRST CLAIM FOR RELIEF - DECLARATORY RELIEF REGARDING APPLICATION OF AB 125 | 0.70 | 115.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: SECOND CLAIM FOR RELIEF - CLAIM PRECLUSION | 1.30 | 214.50 |
| DMC | L210 | A103 | | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: PRAYER | 0.30 | 49.50 |
| DMC | L120 | A104 | | REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| DMC | L120 | A103 | | DRAFT/REVISE RESPONSE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) WITH COPY TO MICHAEL DEAN (CLIENT MJ DEAN) RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| 07/18/2016 | PCB | L210 | A104 | REVIEW/ANALYZE NEW CD STATUTE AND CLIENTS' RESPONSE TO THE CHAPTER 40 NOTICE [REDACTED] | | |
| | | | | [REDACTED] | 0.20 | 37.00 |
| 07/19/2016 | RAB | L320 | A104 | REVIEW/ANALYZE DISMISSAL AND EARLY ENTRY ORDER RELATING TO OUR CLIENT IN ANOTHER CASE, [REDACTED] | | |
| | | | | [REDACTED] | 0.30 | 28.50 |
| 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 | 0.90 | 148.50 |
| | DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: THIRD CLAIM FOR RELIEF - FAILURE TO COMPLY WITH NRS 40. 600 ET SEQ. | 0.60 | 99.00 |

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PANORAMA TOWER I
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|            |     |      |      |                                                                                                                                                                      | Hours | Amount |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) COMPLAINT FOR DECLARATORY RELIEF RE: FOURTH CLAIM FOR RELIEF - SUPPRESSION OF EVIDENCE/SPOILIATION                                           | 0.30  | 49.50  |
| 08/03/2016 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                    |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO TRACY JIN AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                          |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                  |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED]                                                                                                       |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
| 08/05/2016 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED]                                                                                  |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE (CLIENTS' EXCESS INSURANCE CARRIER) RE: [REDACTED]                                                                     |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L160 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH SCOTT WILLIAMS (CLAIMANT'S COUNSEL) RE: CLAIMANT'S DEMAND FOR CHAPTER 40 MEDIATION AND PROPOSED STRATEGIES RELATING TO SAME | 0.20  | 33.00  |
|            | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CLAIMANT'S COUNSEL) TO BRUCE EDWARDS (MEDIATOR) RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION                  | 0.10  | 16.50  |
| 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                                  | 0.10  | 16.50  |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION                        | 0.10  | 16.50  |
|            | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING CASE STATUS, INCLUDING STATUS OF CHAPTER 40 MEDIATION  | 0.10  | 16.50  |
| 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                    | 0.10  | 16.50  |
| 08/11/2016 | DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE ASSOCIATION RE:                                                                        |       |        |

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| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | GENERAL ALLEGATIONS AND ADDITIONAL FACTUAL SUPPORT FOR CAUSES OF ACTION | 1.20 | 198.00 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: MEDIATOR'S PROPOSED STRATEGIES RELATING TO CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: [REDACTED] | 0.10 | 16.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DAVID CASTILLO OF JAMS (MEDIATOR) TO ALL COUNSEL RE: PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | 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 | 0.10 | 16.50 |
| | DMC | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS, INCLUDING STATUS OF OF CHAPTER 40 MEDIATION | 0.20 | 33.00 |
| 08/12/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) TO ALL COUNSEL RE: MEDIATOR'S PROPOSED ALTERNATIVE STRATEGIES RELATING TO CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | 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 | 0.10 | 16.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: INSPECTIONS OF THE ALLEGED DEFECTS AND CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: OUR CLIENT'S INSPECTIONS OF THE ALLEGED DEFECTS AND NO ANTICIPATED ADDITIONAL INSPECTIONS UNTIL AFTER THE CASE PROCEEDS TO LITIGATION AND REGARDING CHAPTER 40 MEDIATION | 0.10 | 16.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: REQUEST FOR DEFECT LIST AND COST OF REPAIR | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTUALIC) RE: PLAINTIFF HAS NOT ISSUED A DEFECT LIST OR A COST OF REPAIR | 0.10 | 16.50 |
| 08/18/2016 | PCB | L190 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR CARRIER FOR VICTAULIC RE: [REDACTED] | 0.20 | 37.00 |
| 08/19/2016 | PCB | L190 | A104 | REVIEW/ANALYZE LETTER FROM COUNSEL FOR VICTUALIC, [REDACTED] | | |

CHUBB INSURANCE

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August 31, 2016

Account No: 1287-5511M

Statement No: 2

|            |     |      |      |                                                                                                                                                                                  | Hours | Amount   |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------|
|            |     |      |      |                                                                                                                                                                                  | 0.10  | 18.50    |
| 08/23/2016 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE:<br>[REDACTED]                                                                                                                | 0.10  | 16.50    |
| 08/24/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) TO DAVID CASTILLO OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL R E: STRATEGIES RELATING TO CHAPTER 40 MEDIATION | 0.10  | 16.50    |
|            | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM DAVID CASTILLO TO SCOTT WILLIAMS (ASSOCIATION'S COUNSEL) OF JAMS (MEDIATOR) WITH COPY TO ALL COUNSEL RE: STRATEGIES RELATING TO CHAPTER 40 MEDIATION  | 0.10  | 16.50    |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO ROBERT SCHUMACHER AND THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: [REDACTED]                                                                                  | 0.10  | 16.50    |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                                                        | 0.10  | 16.50    |
|            | DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM THOMAS LYNN (COUNSEL FOR VICTAULIC) RE: [REDACTED]                                                                                           | 0.10  | 16.50    |
|            | DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                                           | 0.10  | 16.50    |
|            |     |      |      |                                                                                                                                                                                  | 0.10  | 16.50    |
|            |     |      |      | For Current Services Rendered                                                                                                                                                    | 30.60 | 5,098.00 |
|            |     |      |      | Total Non-billable Hours                                                                                                                                                         | 0.10  |          |

## Recapitulation

| Timekeeper         | Title     | Hours | Rate     | Total    |
|--------------------|-----------|-------|----------|----------|
| Peter C. Brown     | PARTNER   | 4.20  | \$185.00 | \$777.00 |
| Jennifer Vela      | PARALEGAL | 0.20  | 95.00    | 19.00    |
| Darlene M. Cartier | ASSOCIATE | 25.90 | 165.00   | 4,273.50 |
| Rachel A. Bounds   | PARALEGAL | 0.30  | 95.00    | 28.50    |

## Expenses

|            |      |      |                                                                                                            |          |
|------------|------|------|------------------------------------------------------------------------------------------------------------|----------|
| 06/01/2016 | L100 | E123 | OTHER PROFESSIONALS (5102) EMP CONSULTANTS, INC. (CONSULTATION SERVICES) (INVOICE NO.: 30054)              | 120.00   |
| 06/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR JUNE 2016 (46 PAGES AT .08/PAGE)                                                    | 3.68     |
| 07/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR JULY 2016 (131 PAGES AT .08/PAGE)                                                   | 10.48    |
| 08/01/2016 | L100 | E123 | OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (CONSULTING SERVICES) (INVOICE NO.: 1119903) | 915.00   |
| 08/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR AUGUST 2016 (136 PAGES AT .08/PAGE)                                                 | 10.88    |
|            |      |      | Total Expenses                                                                                             | 1,060.04 |
|            |      |      | Total Current Work                                                                                         | 6,158.04 |

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AA2750



## CHUBB INSURANCE

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August 31, 2016

Account No: 1287-5511M

Statement No: 2

Previous Balance \$8,345.22

Balance Due \$14,503.26

| Aged Due Amounts | | | | | |
|------------------|-------|-------|----------|---------|------|
| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
| 6,158.04 | 0.00 | 0.00 | 8,345.22 | 0.00 | 0.00 |

Task Code Summary

| | | <u>Fees</u> | <u>Expenses</u> |
|------|---|-------------|-----------------|
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 1060.04 |
| L110 | FACT INVESTIGATION/DEVELOPMENT | 92.50 | 0.00 |
| L120 | ANALYSIS/STRATEGY | 2577.00 | 0.00 |
| L160 | SETTLEMENT/NON-BINDING ADR | 422.50 | 0.00 |
| L190 | OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 185.00 | 0.00 |
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 3,277.00 | 1,060.04 |
| L210 | PLEADINGS | 1736.50 | 0.00 |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS | 37.00 | 0.00 |
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS | 1,773.50 | 0.00 |
| L320 | DOCUMENT PRODUCTION | 47.50 | 0.00 |
| L300 | DISCOVERY | 47.50 | 0.00 |

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

0042

AA2751

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

TAX ID # 33-0747275

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

Attn: Sherilyn Brydon

Panorama Tower II

PANORAMA TOWER II

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 February 28, 2017
 Account No: 1287-5581V
 Statement No: 2

| | | | | <u>Fees</u> | Hours | |
|------------|----------|------|---|-------------|-------|------|
| 12/05/2016 | DMC L160 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM BRUCE EDWARDS (MEDIATOR) RE: RECENT CHAPTER 40 MEDIATION, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | 0.05 | 8.25 |
| | DMC L120 | A103 | DRAFT/REVISE E-MAIL TO FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: CLIENTS' DEMAND FOR THE HOA'S RESPONSE TO CLIENT'S COMPLAINT AGAINST THE HOA (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | 0.05 | 8.25 |
| 12/06/2016 | DMC L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: THE HOA'S FORTHCOMING RESPONSE TO CLIENT'S COMPLAINT AGAINST THE HOA) PENDING) OUR CLIENTS' REVIEW OF THE HOA'S RESPONSE TO CLIENTS' TENDER OF DEFENSE, 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 |
| 12/07/2016 | DMC L120 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | 0.05 | 8.25 |
| | DMC L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM | | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
|------------|-----|------|---|-------|------|
| | | | CARL HOUSTON (COUNSEL FOR CULLIGAN)
RE: RECENT CASE DEVELOPMENTS
INCLUDING THE HOA'S RESPONSE TO
CLIENTS' TENDER AND THE HOA'S
FORTHCOMING RESPONSE TO CLIENTS'
DECLARATORY RELIEF COMPLAINT (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 REVIEW/ANALYZE ADDITIONAL E-MAIL
FROM CARL HOUSTON (COUNSEL FOR
CULLIGAN) RE: ADDITIONAL DISCUSSION
REGARDING RECENT CASE DEVELOPMENTS
INCLUDING THE HOA'S RESPONSE TO
CLIENTS' TENDER AND THE HOA'S
FORTHCOMING RESPONSE TO CLIENTS'
DECLARATORY RELIEF COMPLAINT, IN
ORDER TO DETERMINE IF ANY FURTHER
RESPONSE IS NECESSARY (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| 12/14/2016 | DMC | L240 | A104 REVIEW/ANALYZE STIPULATION AND ORDER
TO CONTINUE HEARING ON THE HOA'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF AGAINST THE
HOA (PREPARED BY LEGAL ASSISTANT C.
WILLIAMS) FOR COMPLETENESS AND
ACCURACY AND REVISE AND SUPPLEMENT
SAME, IN PREPARATION FOR SUBMISSION
TO ALL COUNSEL (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A104 REVIEW/ANALYZE E-MAIL FROM CAIRO
PERSON OF BRUCE EDWARDS (MEDIATOR)
(TIME SPLIT WITH OTHER CLAIM NO./FILE
PER CARRIER REQUEST) | 0.05 | 8.25 |
| 12/15/2016 | DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM DANIEL
BUCHER OF ENDURANCE SPECIALTY
(CLIENTS' EXCESS CARRIER) [REDACTED]
[REDACTED]
(TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 DRAFT/REVISE RESPONSE TO E-MAIL FROM
DANIEL BUCHER OF ENDURANCE
SPECIALTY (CLIENTS' EXCESS CARRIER) RE:
[REDACTED] | | |


Panorama Tower II

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| | | | | Hours | |
|---|-----|------|------|---|------|
| [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | | | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE SPECIALTY (CLIENTS' EXCESS CARRIER) RE: [REDACTED] | |
| [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | | | 0.05 | 8.25 |
| 12/19/2016 | DMC | L240 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: STIPULATION TO CONTINUE HEARING ON THE HOA'S MOTION TO DISMISS CLIENTS' DECLARATORY RELIEF COMPLAINT AGAINST THE HOA, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION PURSUANT TO MEDIATOR'S REQUEST (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION IN ORDER TO DETERMINE WHETHER ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| 12/20/2016 | DMC | L160 | A104 | REVIEW/ANALYZE FURTHER E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION IN ORDER TO DETERMINE WHETHER ANY RESPONSE | |

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| | | | | Hours | |
|------------|-----|------|------|--|------------|
| | DMC | L120 | A104 | IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (HOA'S COUNSEL) RE: HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA, IN ORDER TO DETERMINE WHAT ACTION OR RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM THE COURT RE: THE PARTIES' STIPULATION TO CONTINUE THE HEARING ON HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA, IN ORDER TO DETERMINE WHAT ACTION OR RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| 12/21/2016 | DMC | L120 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF COURT ORDER RE: HEARING ON THE HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL PARTIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE AON OCIP LIST RE:  (14 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE CLIENT MJ DEAN'S SUBCONTRACTS FOR TOWER 1 IN ORDER TO DETERMINE WHETHER MJ DEAN CONTRACTED WITH ANY OF THE ENROLLED SUBCONTRACTORS WHOSE WORK IS IMPLICATED IN THE ASSOCIATION'S DEFECT CLAIMS AND/OR WHO WERE SERVED WITH | |

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| | | | Hours | |
|-----|------|--|-------|--------|
| | | A CHAPTER 40 NOTICE BY THE ASSOCIATION OR PROVIDED NOTICE BY CLIENTS, IN PREPARATION FOR ESIS PRELIMINARY REPORT (320 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.65 | 107.25 |
| DMC | L120 | A104 REVIEW/ANALYZE CLIENT MJ DEAN'S SUBCONTRACTS FOR TOWER 2 IN ORDER TO DETERMINE WHETHER MJ DEAN CONTRACTED WITH ANY OF THE ENROLLED SUBCONTRACTORS WHOSE WORK IS IMPLICATED IN THE ASSOCIATION'S DEFECT CLAIMS AND/OR WHO WERE SERVED WITH A CHAPTER 40 NOTICE BY THE ASSOCIATION OR PROVIDED NOTICE BY CLIENTS, IN PREPARATION FOR ESIS PRELIMINARY REPORT (368 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.75 | 123.75 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND BOMBARD MECHANICAL FOR TOWER II RE: EXPRESS INDEMNITY PROVISION, INCLUDING ADDENDUM TO SUBCONTRACT REVISING THE INDEMNITY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND DEAN ROOFING COMPANY FOR TOWER I RE: EXPRESS INDEMNITY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND FLIPPIN'S TRENCHING FOR TOWER I RE: EXPRESS INDEMNITY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |

Panorama Tower II

PANORAMA TOWER II

| | | | Hours | |
|-----|------|------|--|-----------|
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND FLIPPIN'S TRENCHING FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND FORD CONTRACTING FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND F. RODGERS FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND INSULPRO FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND INSULPRO FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND SIERRA GLASS & MIRROR FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |

Panorama Tower II

PANORAMA TOWER II

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| | | | REQUEST) | Hours
0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN
CLIENT MJ DEAN AND SIERRA GLASS &
MIRROR FOR TOWER II RE: EXPRESS
INDEMINTY PROVISION, IN ORDER TO
ANALYZE POTENTIAL THIRD-PARTY CLAIM
AND IN PREPARATION FOR ESIS
PRELIMINARY REPORT (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT
BETWEEN CLIENT MJ DEAN AND SOUTHERN
NEVADA PAVING FOR TOWER I RE:
EXPRESS INDEMINTY PROVISION, IN ORDER
TO ANALYZE POTENTIAL THIRD-PARTY
CLAIM AND IN PREPARATION FOR ESIS
PRELIMINARY REPORT (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE (BEGIN) ESIS PRELIMINARY
REPORT RE:
[REDACTED] (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (BEGIN)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE
PER CARRIER REQUEST) | 0.70 | 115.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
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| | | | PRELIMINARY REPORT RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (BEGIN) [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (CONTINUE) | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 | 49.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| 12/27/2016 | DMC | L240 | A104 REVIEW/ANALYZE THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| DMC | L240 | A104 | REVIEW/ANALYZE BWBO BILLING FILE RE: ATTORNEY'S FEES AND LEGAL COSTS INCURRED TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE MEDIATOR BILLING FILE RE: MEDIATOR FEES AND COSTS INCURRED TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE EXPERT BILLING FILE RE: EXPERT FEES AND COSTS INCURRED TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |

Panorama Tower II

PANORAMA TOWER II

Hours

DMC L240 A102 RESEARCH RE: CASES CITED IN THE ASSOCIATION'S MOTION TO DISMISS [REDACTED]

[REDACTED]

(9 CASES)

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| 1.10 | 181.50 |
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DMC L240 A103 DRAFT/REVISE (BEGIN) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: [REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE
PER CARRIER REQUEST)

0.05 8.25

DMC L240 A103 DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: (BEGIN)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST)

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| 0.40 | 66.00 |
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| 12/29/2016 | DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S COMPLAINT AGAINST CLIENTS IN THE PRIOR SETTLED AND DISMISSED LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) |
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0.05 8.25

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| DMC | L240 | A104 | REVIEW/ANALYZE CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE IN THE PRIOR LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) |
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0.05 8.25

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| DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S CHAPTER 40 NOTICE TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) |
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0.05 8.25

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
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| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE RECENT AMENDMENTS TO CHAPTER 40 UNDER NEVADA ASSEMBLY BILL 125, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| DMC | L240 | A104 | REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT FOR TOWER I AND TOWER II, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' CORRESPONDENCE TO THE ASSOCIATION'S COUNSEL DATED MARCH 29, 2016 AND APRIL 29, 2016 DEMANDING DOCUMENTS AND INFORMATION RELATING TO THE ALLEGED DEFECTS REPAIRED BY THE ASSOCIATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' SEPTEMBER 26, 2016 CORRESPONDENCE TO THE ASSOCIATION, TENDERING CLIENTS' DEFENSE AND INDEMNITY PURSUANT TO THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S | | |

Panorama Tower II

PANORAMA TOWER II

| | | | Hours | |
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| | | RESPONSE TO CLIENTS' TENDER OF DEFENSE AND INDEMNITY, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: AFFIDAVIT OF RACHEL BOUNDS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) AFFIDAVIT OF ATTORNEY IN SUPPORT OF OPPOSITION, INCLUDING ADDITION OF EXHIBITS IN SUPPORT OF OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 57.75 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) FACTUAL BACKGROUND - THE PROJECT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - THE | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
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| | | | ASSOCIATION'S CHAPTER 40 NOTICE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 57.75 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - CLIENT'S TENDER OF DEFENSE AND INDEMNITY TO THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: PROCEDURAL AND DISCOVERY STATUS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) APPLICABLE LEGAL AUTHORITY - MOTION TO DISMISS; NRCP 12(b)(5) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 57.75 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) APPLICABLE LEGAL AUTHORITY - MOTION FOR SUMMARY JUDGMENT; NRCP 56(C) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) APPLICABLE LEGAL AUTHORITY - STATUTES OF REPOSE, INCLUDING AMENDMENTS TO STATUTES PURSUANT TO AB 125 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.25 | 41.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: | | |

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PANORAMA TOWER II

| | | | | Hours | |
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| (CONTINUE) APPLICABLE LEGAL AUTHORITY
- DATE OF SUBSTANTIAL COMPLETION
(TIME SPLIT WITH OTHER CLAIM NO./FILE
PER CARRIER REQUEST) | | | | 0.15 | 24.75 |
| 12/30/2016 | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE:
(CONTINUE) AFFIDAVIT OF RACHEL BOUNDS
TO INCLUDE ADDITIONAL PERSONAL
KNOWLEDGE AND DOCUMENTARY
EVIDENCE IN SUPPORT OF OPPOSITION
(TIME SPLIT WITH OTHER CLAIM NO./FILE
PER CARRIER REQUEST) | 0.40 66.00 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: (BEGIN)
LEGAL ARGUMENT - INTRODUCTION TO
LEGAL ARGUMENT (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.15 24.75 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE:
(CONTINUE) LEGAL ARGUMENT - UNIFORM
DECLARATORY JUDGMENT ACT (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.90 148.50 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE:
(CONTINUE) LEGAL ARGUMENT - BUILDER'S
REQUEST FOR DECLARATORY RELIEF IS
PROPER: (1) A JUSTICIABLE
CONTROVERSY EXISTS BETWEEN CLIENTS
AND THE ASSOCIATION (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.70 115.50 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE:
(CONTINUE) LEGAL ARGUMENT - BUILDER'S
REQUEST FOR DECLARATORY RELIEF IS | |

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PANORAMA TOWER II

| | | | Hours | |
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| DMC | L240 | A103 | 0.40 | 66.00 |
| | | PROPER: (2) THE INTERESTS OF CLIENTS AND THE ASSOCIATION ARE ADVERSE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| DMC | L240 | A103 | 0.15 | 24.75 |
| | | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S REQUEST FOR DECLARATORY RELIEF IS PROPER: (3) CLIENTS' HAVE A LEGALLY PROTECTIBLE INTEREST IN THE LEGAL CONTROVERSY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| DMC | L240 | A103 | 0.15 | 24.75 |
| | | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S REQUEST FOR DECLARATORY RELIEF IS PROPER: (4) THE ISSUES INVOLVED IN THE CONTROVERSY ARE RIPE FOR JUDICIAL DETERMINATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| DMC | L240 | A103 | 0.20 | 33.00 |
| | | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| DMC | L240 | A103 | 0.35 | 57.75 |
| | | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (1) THIRD CLAIM FOR RELIEF: FAILURE TO COMPLY WITH CHAPTER 40 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| DMC | L240 | A103 | | |
| | | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' | | |

Panorama Tower II

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| | | | | | Hours | |
|------------|-----|------|------|--|-------|-------|
| | | | | AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (2) FOURTH CLAIM FOR RELIEF: SUPPRESSION OF EVIDENCE/SPOLIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (3) FIFTH CLAIM FOR RELIEF: BREACH OF CONTRACT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 | 49.50 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (4) SIXTH AND SEVENTH CLAIMS FOR DECLARATORY RELIEF: DUTY TO DEFEND AND DUTY TO INDEMNIFY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.50 | 82.50 |
| 01/03/2017 | PCB | L240 | A103 | DRAFT/REVISE (FINALIZE) OPPOSITION TO THE HOA'S MOTION TO DISMISS THE COMPLAINT RE: ADDITIONAL DISCUSSION OF THE PLEADING STANDARDS, THE PROBLEMS WITH THE HOA'S ATTEMPTS TO OBTAIN SUMMARY JUDGMENT ON SOME OF THE ISSUES, THE NEED FOR DECLARATORY RELIEF ON VARIOUS ISSUES, AND THE EFFICACY OF THE COURT BEING ABLE TO DEAL WITH THE ALLEGED ISSUES IN THE COMPLAINT FROM A DECLARATORY RELIEF BASIS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - TOWER I). | 0.40 | 74.00 |
| | DMC | L120 | A104 | REVIEW/ANALYZE CLIENTS' CURRENTLY | | |

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PANORAMA TOWER II

| | | | | Hours | |
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| | | | OBTAINED PRIMARY AND EXCESS INSURANCE POLICIES IN PREPARATION FOR ESIS PRELIMINARY REPORT AND DISCUSSION WITH CLIENT REGARDING SAME (606 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.55 | 90.75 |
| | DMC L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (BEGIN) | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| | DMC L250 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S MOTION TO ASSOCIATE SCOTT WILLIAMS (CALIFORNIA COUNSEL), IN ORDER TO DETERMINE IF ANY OPPOSITION IS NECESSARY (19 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| 01/04/2017 | DMC L240 | A104 | REVIEW/ANALYZE FIRM BILLING RE: ATTORNEYS FEES INCURRED RELATING TO PREPARATION OF CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY ANALYZE REVIEW FIRM BILLING RE: ATTORNEY FEES IN ORDER TO INCLUDE THESE ADDITIONAL FEES IN THE OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: UPDATE AFFIDAVIT OF ATTORNEY PETER BROWN AND LEGAL ARGUMENT TO INCLUDE ADDITIONAL ATTORNEYS FEES AND COSTS INCURRED FOR PREPARING CLIENTS' OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| | DMC L240 | A104 | REVIEW/ANALYZE NOTICE OF SUBMISSION OF EXHIBIT FOR IN CAMERA REVIEW RE: | | |

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| | | | Hours | |
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| | | CONFIDENTIAL SETTLEMENT AGREEMENT
IN THE PRIOR LITIGATION), IN SUPPORT OF
TO CLIENTS' OPPOSITION TO THE
ASSOCIATION'S MOTION TO DISMISS
CLIENTS' COMPLAINT FOR DECLARATORY
RELIEF (PREPARED BY ASSISTANT CRYSTAL
WILLIAMS) FOR COMPLETENESS AND
ACCURACY AND EDIT AND SUPPLEMENT
SAME IN PREPARATION FOR FILING (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L240 | A104 REVIEW/ANALYZE NOTICE OF SUBMISSION
OF EXHIBIT FOR IN CAMERA REVIEW RE:
CONFIDENTIAL SETTLEMENT AGREEMENT
IN THE PRIOR LITIGATION), IN SUPPORT OF
TO CLIENTS' OPPOSITION TO THE
ASSOCIATION'S MOTION TO DISMISS
CLIENTS' COMPLAINT FOR DECLARATORY
RELIEF (PREPARED BY ASSISTANT CRYSTAL
WILLIAMS) FOR COMPLETENESS AND
ACCURACY AND EDIT AND SUPPLEMENT
SAME IN PREPARATION FOR FILING (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED] (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.30 | 49.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.25 | 41.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: (CONTINUE)
[REDACTED]
[REDACTED] (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) ESIS | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
|--|------|------|---|-------|-------|
| PRELIMINARY REPORT RE: (CONTINUE) | | | | | |
| [REDACTED] (TIME | | | | | |
| SPLIT WITH OTHER CLAIM NO./FILE PER | | | | | |
| CARRIER REQUEST) | | | | 0.05 | 8.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) ESIS | | |
| PRELIMINARY REPORT RE: (CONTINUE) | | | | | |
| [REDACTED] | | | | | |
| DMC | L240 | A103 | DRAFT/REVISE PREPARE PROPOSED | 0.40 | 66.00 |
| SIX-MONTH CASE BUDGET (TIME SPLIT | | | | | |
| WITH OTHER CLAIM NO./FILE PER CARRIER | | | | | |
| REQUEST) | | | | 0.35 | 57.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH | | |
| ENCLOSURE FROM BRUCE EDWARDS | | | | | |
| (MEDIATOR) RE: RECENT CHAPTER 40 | | | | | |
| MEDIATION, IN ORDER TO DETERMINE | | | | | |
| WHAT RESPONSE OR ACTION IS | | | | | |
| NECESSARY (TIME SPLIT WITH OTHER | | | | | |
| CLAIM NO./FILE PER CARRIER REQUEST) | | | | 0.05 | 8.25 |
| 01/05/2017 | DMC | L120 | A103 DRAFT/REVISE E-MAIL TO FRANCIS LYNCH | | |
| (COUNSEL FOR THE ASSOCIATION) RE: | | | | | |
| CLIENTS' FORTHCOMING RESPONSE TO | | | | | |
| THE ASSOCIATION'S MOTION TO ASSOCIATE | | | | | |
| COUNSEL AND REQUEST FOR THE | | | | | |
| ASSOCIATION TO AGREE TO DESIGNATE | | | | | |
| THE CASE COMPLEX AND APPOINT FLOYD | | | | | |
| HALE AS SPECIAL MASTER IN LIEU OF | | | | | |
| CLIENTS' HAVING TO FILE A MOTION (TIME | | | | | |
| SPLIT WITH OTHER CLAIM NO./FILE PER | | | | | |
| CARRIER REQUEST) | | | | 0.05 | 8.25 |
| DMC | L250 | A103 | DRAFT/REVISE CLIENT'S RESPONSE TO THE | | |
| ASSOCIATION'S MOTION TO ASSOCIATE | | | | | |
| COUNSEL (TIME SPLIT WITH OTHER CLAIM | | | | | |
| NO./FILE PER CARRIER REQUEST) | | | | 0.20 | 33.00 |
| DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM | | |
| FRANCIS LYNCH (COUNSEL FOR THE | | | | | |
| ASSOCIATION) RE: AGREEMENT TO | | | | | |
| DESIGNATE THE CASE COMPLEX AND | | | | | |
| APPOINT FLOYD HALE AS SPECIAL MASTER | | | | | |
| IN LIEU OF CLIENTS' HAVING TO FILE A | | | | | |
| MOTION, IN ORDER TO DETERMINE IF ANY | | | | | |
| RESPONSE IS NECESSARY (TIME SPLIT | | | | | |
| WITH OTHER CLAIM NO./FILE PER CARRIER | | | | | |
| REQUEST) | | | | 0.05 | 8.25 |
| DMC | L250 | A103 | DRAFT/REVISE STIPULATION TO DEEM THE | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
|---|----------|------|--|-------|-------|
| CASE AS COMPLEX LITIGATION AND TO APPOINT FLOYD HALE AS SPECIAL MASTER AND PROPOSED COURT ORDER | | | | 0.20 | 33.00 |
| 01/06/2017 | DMC L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CO-CO-COUNSEL FOR THE ASSOCIATION - PENDING MOTION TO ASSOCIATE) TO BRUCE EDWARDS (MEDIATOR) RE: REQUESTING MEDIATOR KEEP THIS MATTER OPEN, IN ORDER TO DETERMINE IF ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/09/2017 | DMC L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S STIPULATION TO DEEM THE CASE COMPLEX AND TO DESIGNATE FLOYD HALE AS SPECIAL MASTER, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC L120 | A104 | REVIEW/ANALYZE E-MAIL WITH MULTIPLE ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/10/2017 | DMC L250 | A104 | REVIEW/ANALYZE ORDER FROM THE COURT RE: APPROVING THE CLIENT'S THE ASSOCIATION'S STIPULATION TO DEEM THE CASE COMPLEX AND TO DESIGNATE FLOYD HALE AS SPECIAL MASTER, 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 L250 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: COURT ORDER DEEMING THE CASE COMPLEX AND APPOINTING SPECIAL MASTER (PREPARED BY ASSISTANT CRYSTAL WILLIAMS) FOR COMPLETENESS | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
|--|-----|------|---|-------|--------|
| 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 | 8.25 |
| 01/12/2017 | DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/13/2017 | DMC | L250 | A104 REVIEW/ANALYZE COURT MINUTE ORDER GRANTING THE ASSOCIATION'S MOTION TO ASSOCIATE COUNSEL AND REQUEST FOR COUNSEL TO SUBMIT FORMAL ORDER, 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 |
| 01/23/2017 | PCB | L240 | A104 REVIEW/ANALYZE (BEGIN) ALL PLEADINGS, EXHIBITS AND CASE LAW CITED BY BOTH SIDES WITH REGARD TO THE HOA'S MOTION TO DISMISS THE CLIENTS' DECLARATORY RELIEF ACTION IN PREPARATION FOR TOMORROW'S HEARING (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - PANORAMA TOWER I). | 0.70 | 129.50 |
| 01/24/2017 | PCB | L240 | A101 PLAN AND PREPARE FOR (CONTINUE) FOR HEARING ON THE HOA'S MOTION TO DISMISS RE: CONTINUE TO OUTLINE ORAL ARGUMENTS AND PRACTICE OF ORAL ARGUMENTS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - TOWER I). | 0.60 | 111.00 |
| | PCB | L240 | A109 APPEAR FOR/ATTEND HEARING ON THE HOA'S MOTION TO DISMISS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.551 - TOWER I). | 1.20 | 222.00 |
| 01/30/2017 | DMC | L250 | A103 DRAFT/REVISE E-MAIL TO FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: DEMAND FOR ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | | Hours | |
|--|-----|------|------|--|-------|-------|
| CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | | | | 0.05 | 8.25 |
| 02/01/2017 | DMC | L240 | A104 | REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: HIS FORTHCOMING EXECUTED ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' DECLARATORY RELIEF COMPLAINT, IN ORDER TO DETERMINE IF ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 02/06/2017 | PCB | L120 | A104 | REVIEW/ANALYZE PLEADINGS FROM OTHER CASE [REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.581 - PANORAMA TOWER I). | 0.30 | 55.50 |
| 02/07/2017 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: CASE STATUS, 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 |
| 02/08/2017 | DMC | L240 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: ORDER ON THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, 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 |
| 02/09/2017 | DMC | L240 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARTION FOR FILING | | |

Panorama Tower II

PANORAMA TOWER II

| | | | | Hours | |
|--|-----|------|------|---|----------|
| WITH THE COURT AND SERVICE ON ALL PARTIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | | | 0.05 | 8.25 |
| 02/21/2017 | DMC | L230 | A104 | REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: NOTICE OF SPECIAL MASTER HEARING IN ORDER TO DETERMINE IF ANY OBJECTION OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | | 0.05 | 8.25 |
| For Current Services Rendered | | | | 21.95 | 3,685.75 |

Recapitulation

| Timekeeper | Title | Hours | Rate | Total |
|--------------------|-----------|-------|----------|----------|
| Peter C. Brown | PARTNER | 3.20 | \$185.00 | \$592.00 |
| Darlene M. Cartier | ASSOCIATE | 18.75 | 165.00 | 3,093.75 |

Expenses

| | | | | |
|------------|------|------|---|-------|
| 12/01/2016 | L100 | E112 | SERVICE OF PROCESS (9999) AMERICAN LEGAL INVESTIGATION SERVICES NV (INVOICE #37007284 SUMMONS & COMPLAINT - PANORAMA TOWERS CONDOMINIUM UNIT / SERVICES PROVIDED ON 09/29/16 - SPLIT WITH 1287.551) | 23.87 |
| 12/20/2016 | L100 | E112 | WIZ-NET (STIPULATION AND ORDER TO CONTINUE HEARING ON DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO DISMISS COMPLAINT) | 1.75 |
| 12/20/2016 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO DISMISS COMPLAINT) | 1.75 |
| 01/10/2017 | L100 | E112 | WIZ-NET (STIPULATION AND ORDER TO DEEM THE CASE COMPLEX AND TO APPOINT FLOYD HALE AS SPECIAL MASTER) | 1.75 |
| 01/10/2017 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF STIPULATION AND ORDER TO DEEM THE CASE COMPLEX AND TO APPOINT FLOYD HALE AS SPECIAL MASTER) | 1.75 |
| 01/24/2017 | L100 | E109 | PARKING (PETER BROWN) | 7.00 |
| 02/09/2017 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO DISMISS COMPLAINT) | 1.75 |
| 02/09/2017 | L100 | E112 | WIZ-NET (ORDER DENYING DEFENDANT | |

Panorama Tower II

PANORAMA TOWER II

PANORAMA TOWERS CONDOMINIUM UNIT
OWNERS' ASSOCIATION'S MOTION TO DISMISS
COMPLAINT)

1.75

Total Expenses

41.37

Total Current Work

3,727.12

Previous Balance

\$4,361.31

Balance Due

\$8,088.43

| 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> |
| 3,727.12 | 0.00 | 4,361.31 | 0.00 | 0.00 | 0.00 |

Task Code Recapitulation

| | | <u>Fees</u> | <u>Expenses</u> |
|------|---|-------------|-----------------|
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 41.37 |
| L120 | ANALYSIS/STRATEGY | 987.75 | 0.00 |
| L160 | SETTLEMENT/NON-BINDING ADR | 49.50 | 0.00 |
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 1,037.25 | 41.37 |
| L230 | COURT MANDATED CONFERENCES | 8.25 | 0.00 |
| L240 | DISPOSITIVE MOTIONS | 2524.75 | 0.00 |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS | 115.50 | 0.00 |
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS | 2,648.50 | 0.00 |

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

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

TAX ID # 33-0747275

CHUBB INSURANCE
525 W. MONROE STREET
CHICAGO IL 60661

Attn: Jeff Ganzer

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PANORAMA TOWER I
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Fees

|            |     |      |      |                                                                                                                                                                                                                            | 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 | 0.10  | 16.50  |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO ALL SUBCONTRACTOR COUNSEL RE: [REDACTED]                                                                                                                                                            | 0.10  | 16.50  |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO MARTIN LITTLE (COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                                                                                           | 0.10  | 16.50  |
|            | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO JEFF GANZER (CARRIER) RE: [REDACTED]                                                                                                                                                                | 0.10  | 16.50  |
|            | DMC | L160 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                                                                                     | 0.10  | 16.50  |
| 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.                                           | 0.40  | 74.00  |
| 09/04/2016 | PCB | L120 | A103 | DRAFT/REVISE EMAIL TO JEFF GANZER (CHUBB) RE: [REDACTED]                                                                                                                                                                   | 0.10  | 18.50  |
| 09/06/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CAIRO PETERSON OF JAMS (MEDIATOR) RE: [REDACTED]                                                                                                                                                | 0.10  | 16.50  |
|            | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE:                                                                                                                            |       |        |

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AA2775

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| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |
| | | | | | 0.10 | 16.50 |
| 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 | 0.10 | 16.50 |
| | DMC | L160 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CARRIER) RE: [REDACTED] | | |
| | | | | | 0.30 | 49.50 |
| | DMC | L160 | A104 | (ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) 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 | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE REPLY TO E-MAIL FROM MARIELLE ENRIQUEZ (COUNSEL FOR OLD CASTLE) WITH COPY TO ROBERT THOMPSON (COUNSEL FOR OLD CASTLE) RE: [REDACTED] | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE E-MAIL TO JEFFREY GANZER (CARRIER) RE: [REDACTED] | | |
| | | | | | 0.10 | 16.50 |
| | DMC | L160 | A103 | DRAFT/REVISE FORM CORRESPONDENCE TO ALL SUBCONTRACTORS BWBO PLACED ON NOTICE OF THE ASSOCIATION'S CHAPTER 40 CLAIM REGARDING THE UPCOMING MEDIATION IN PREPARATION (INDIVIDUAL LETTERS TO EACH SUBCONTRACTOR TO BE PREPARED BY THE SECRETARY) | 0.30 | 49.50 |
| 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 | 0.10 | 16.50 |
| | DMC | L160 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH ASHLEY ALLARD (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |

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|     |      |      |                                                                                                                                                                                             | Hours | Amount |
|-----|------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|     |      |      | [REDACTED]                                                                                                                                                                                  |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (BEGIN) CONFIDENTIAL MEDIATION BRIEF FOR<br>UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                       | 0.20  | 33.00  |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.20  | 33.00  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.30  | 49.50  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.30  | 49.50  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 1.30  | 214.50 |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.60  | 99.00  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 1.10  | 181.50 |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.30  | 49.50  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 1.40  | 231.00 |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A103 | DRAFT/REVISE (CONTINUE) CONFIDENTIAL MEDIATION BRIEF<br>FOR UPCOMING CHAPTER 40 MEDIATION RE: [REDACTED]                                                                                    | 0.40  | 66.00  |
|     |      |      | (AUTHORIZED BY CARRIER 9/12/16)                                                                                                                                                             |       |        |
| DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL<br>FOR CULLIGAN) RE: HIS FORTHCOMING DETERMINATION AS<br>TO WHETHER CULLIGAN WILL BE PARTICIPATING IN THE<br>UPCOMING CHAPTER 40 MEDIATION | 0.10  | 16.50  |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURES FROM EDEN<br>WATERS OF MKA (CLIENT'S ARCHITECTURAL EXPERT) RE: [REDACTED]                                                                             | 0.20  | 33.00  |

## CHUBB INSURANCE

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| | | | | | Hours | Amount |
|------------|-----|------|------|--|-------|--------|
| 09/14/2016 | RAB | L320 | A104 | REVIEW/ANALYZE CERTIFICATE OF OCCUPANCIES, RE:
[REDACTED] | 0.20 | 19.00 |
| | RAB | L320 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: CERTIFICATES OF COMPLETION AND FINAL INSPECTION REPORTS. | 0.20 | 19.00 |
| | DMC | L120 | A104 | REVIEW/ANALYZE REVIEW OCIP ENROLLMENT LIST AND OTHER NAMED RESPONDENTS THE ASSOCIATION SERVED WITH CHAPTER 40 NOTICES TO DETERMINE WHICH RESPONDENTS ARE ENROLLED IN THE OCIP AND RELEASED FOR PRIOR CLAIMS AND THOSE THAT ARE NOT, [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE: [REDACTED] | 0.05 | 8.25 |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| 09/15/2016 | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT EMP CONSULTANTS, RE: INFORMATION [REDACTED] | 0.10 | 9.50 |
| | RAB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | 0.10 | 9.50 |
| | RAB | L130 | A103 | DRAFT/REVISE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | 0.10 | 9.50 |
| | DMC | L150 | A103 | DRAFT/REVISE PHASE I LITIGATION BUDGET PURSUANT TO REQUEST BY CARRIER | 0.40 | 66.00 |
| | PCB | L120 | A104 | REVIEW/ANALYZE (BEGIN) INFORMATION FROM EXPERT INVESTIGATION PERFORMED TO DATE AND INFORMATION FROM THE FIRST "PANORAMA" LITIGATION [REDACTED] | | |
| | | | | (TIME SPLIT WITH FILE #1287.558 - "PANORAMA TOWER II"). | 0.40 | 74.00 |
| 09/16/2016 | RAB | L140 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH THE CLARK COUNTY BUILDING DEPARTMENTS RECORDS DEPARTMENT, RE: FINAL INSPECTION REPORTS. | 0.20 | 19.00 |
| | RAB | L140 | A103 | DRAFT/REVISE MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: INFORMATION RELATING TO FINAL INSPECTION REPORTS. | 0.10 | 9.50 |
| | RAB | L140 | A104 | REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S EXPERT INFORMATION [REDACTED] | 0.10 | 9.50 |
| | RAB | L140 | A104 | REVIEW/ANALYZE DOCUMENTS FROM OUR CLIENT'S EXPERT | | |

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|            |     |      |                                          |                                                                                                                                                                                                  | Hours | Amount |
|------------|-----|------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      | MADSEN, KNEPPERS & ASSOCIATES, INC., RE: |                                                                                                                                                                                                  |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  | 0.10  | 9.50   |
|            | RAB | L140 | A103                                     | DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT                                                                                                                                               |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  | 0.10  | 9.50   |
| 09/19/2016 | PCB | L120 | A101                                     | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE:                                                                                                                                        |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  |       |        |
|            |     |      |                                          | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558).                                                                                                                            | 0.10  | 18.50  |
|            | PCB | L250 | A103                                     | DRAFT/REVISE (FINALIZE) CONFIDENTIAL MEDIATION BRIEF RE:                                                                                                                                         |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  |       |        |
|            |     |      |                                          | (TIME SPLIT WITH OTHER FILE DEALING WITH SAME CASE - "PANORAMA TOWER II" - 1287.588).                                                                                                            | 0.40  | 74.00  |
|            | PCB | L160 | A101                                     | PLAN AND PREPARE (BEGIN) FOR NEXT WEEK'S MEDIATION RE:                                                                                                                                           |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  |       |        |
|            |     |      |                                          | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                                                                                                                      | 0.50  | 92.50  |
|            | DMC | L160 | A104                                     | REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE:                                                                                                                                   |       |        |
|            |     |      |                                          | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                       | 0.05  | 8.25   |
| 09/20/2016 | DMC | L160 | A104                                     | REVIEW/ANALYZE E-MAIL FROM JEFFREY GANZER (CARRIER) RE:                                                                                                                                          |       |        |
|            |     |      |                                          |                                                                                                                                                                                                  | 0.10  | 16.50  |
|            | DMC | L160 | A103                                     | DRAFT/REVISE SEPARATE CORRESPONDENCE TO INSULPRO PROJECTS, FLIPPINS TRENCHING, BOMBARD MECHANICAL, FORD CONTRACTING AND SIERRA GLASS RE:                                                         |       |        |
|            |     |      |                                          | (5 LETTERS)                                                                                                                                                                                      | 0.30  | 49.50  |
|            | 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) | 0.30  | 49.50  |
|            | 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           |       |        |

|            |     |      |                                                                                                                                                                  | Hours | Amount |
|------------|-----|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | DMC | L160 | A104                                                                                                                                                             | 0.30  | 49.50  |
|            |     |      | EXCUSED FROM THE UPCOMING CHAPTER 40 MEDIATION REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                     |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            | DMC | L160 | A103                                                                                                                                                             | 0.10  | 16.50  |
|            |     |      | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: HIS DEMAND FOR ANY [REDACTED]                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            | DMC | L160 | A104                                                                                                                                                             | 0.10  | 16.50  |
|            |     |      | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED]                                                                         |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       | 0.10  | 16.50  |
| 09/21/2016 | PCB | L120 | A101                                                                                                                                                             |       |        |
|            |     |      | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S MEDIATION RE: [REDACTED]                                                                                             |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558)(NO TRAVEL TIME INCLUDED IN THE ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE). |       |        |
|            | DMC | L160 | A103                                                                                                                                                             | 0.60  | 111.00 |
|            |     |      | DRAFT/REVISE E-MAIL TO MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                        |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            | DMC | L160 | A109                                                                                                                                                             | 0.10  | 16.50  |
|            |     |      | APPEAR FOR/ATTEND MEETING WITH SHANE STREAM OF HOLO DISCOVERY AND MICHELLE ROBBINS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                         |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | (ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL)                                                                                |       |        |
|            | DMC | L160 | A104                                                                                                                                                             | 1.00  | 165.00 |
|            |     |      | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM CAIRO PERSON OF JAMS ON BEHALF OF BRUCE EDWARDS (MEDIATOR) RE: [REDACTED]                                              |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            | DMC | L160 | A103                                                                                                                                                             | 0.10  | 16.50  |
|            |     |      | DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]                                                                                               |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            | DMC | L160 | A104                                                                                                                                                             | 0.10  | 16.50  |
|            |     |      | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM ASHLEY ALLARD OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]                                                    |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | [REDACTED]                                                                                                                                                       |       |        |
|            |     |      | (137 PAGES)                                                                                                                                                      |       |        |
|            | DMC | L160 | A104                                                                                                                                                             | 0.30  | 49.50  |
|            |     |      | REVIEW/ANALYZE PRIOR EXPERT REPORT BY CHRIS ALLEN (PLAINITFF'S ARCHITECTURAL EXPERT) IN PRIOR LITIGATION [REDACTED]                                              |       |        |

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| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | (52 PAGES)
IN PREPARATION FOR DISCUSSION WITH SHANE GODFREY
(AUDIO VISUAL) FOR UPCOMING CHAPTER 40 MEDIATION
DRAFT/REVISE E-MAIL TO SHANE GODFREY (AUDIO VISUAL)
RE: [REDACTED] | 0.30 | 49.50 |
| | | | | [REDACTED] | 0.10 | 16.50 |
| 09/22/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S
MEDIATION RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER
FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558). | 0.40 | 74.00 |
| | RAB | L320 | A104 | REVIEW/ANALYZE DOCUMENTS FOR UPCOMING CHAPTER 40
MEDIATION, RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.20 | 19.00 |
| | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO SHANE FROM HOLO DISCOVERY
SOLUTIONS, RE: [REDACTED] | 0.10 | 9.50 |
| 09/23/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE
ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO
SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO
VISUAL) RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM MICHELLE
ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) WITH COPY TO
SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED] | | |
| | | | | [REDACTED] | 0.10 | 16.50 |
| 09/24/2016 | DMC | L120 | A109 | APPEAR FOR/ATTEND WITH SHANE GODFREY (AUDIO
VISUAL) AND MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL
EXPERT) RE: [REDACTED] | | |

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|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                             | Hours | Amount |
|------------|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|-------|--------|
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED]                                                                                  |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED]                                                                                  |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED]                                                                                  |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED] ATTENDANCE BY DMC AND PCB AUTHORIZED BY CARRIER) (ENTRY DOES NOT INCLUDE TRAVEL) | 2.10  | 346.50 |
| DMC        | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO PLAINTIFF RE: DEFENSE ANALYSIS OF EVIDENCE IN SUPPORT OF ARGUMENTS THAT THE ASSOCIATIONS NEW CLAIMS INVOLVING WINDOWS AND FIREBLOCKING 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 |                                                                                             | 0.80  | 132.00 |
| DMC        | L120 | A103 | DRAFT/REVISE RECEIPT OF COPY FOR CORRESPONDENCE TO PLAINTIFF RE: HAND DELIVERY BY BWBO COUNSEL OF TENDER OF CLIENTS' DEFENSE TO THE ASSOCIATION AND DEMAND FOR DEFENSE AND INDEMNITY OF CLAIMS PURSUANT TO THE TERMS OF THE PRIOR SETTLEMENT AGREEMENT IN PREPARATION FOR DELIVERY AT UPCOMING CHAPTER 40 MEDIATION                                                                                                                                                           |                                                                                             | 0.10  | 16.50  |
| PCB        | L120 | A101 | PLAN AND PREPARE FOR TODAY'S MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE: [REDACTED]                                                                                                                                                                                                                                                                                                      |                                                                                             |       |        |
|            |      |      | [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                             |       |        |
|            |      |      | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                             | 0.80  | 148.00 |
| PCB        | L120 | A109 | APPEAR FOR/ATTEND MEETING WITH CLIENT'S ARCHITECTURAL EXPERT (MKA) AND THE COMPANY PUTTING TOGETHER THE POWERPOINT FOR THE MEDIATION (HOLODOC) RE: [REDACTED]                                                                                                                                                                                                                                                                                                                 |                                                                                             |       |        |
|            |      |      | [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                             |       |        |
|            |      |      | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558)(NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE IT TOOK PLACE AT BWB&O'S OFFICE).                                                                                                                                                                                                                                                                                                                      |                                                                                             | 1.10  | 203.50 |
| 09/25/2016 | PCB  | L120 | A103                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | DRAFT/REVISE (BEGIN) MEDIATION "TALKING POINTS" OUTLINE [REDACTED]                          |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED]                                                                                  |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | (TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA TOWER II" - 1287.558).                 | 1.10  | 203.50 |
| PCB        | L160 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE: [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                             |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | [REDACTED]                                                                                  |       |        |
|            |      |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | TIME SPLIT WITH OTHER FILE IN SAME CASE -                                                   |       |        |



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| | | | | "PANORAMA II" - 1287.588)(NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE). | 2.10 | 388.50 |
| | PCB | L160 | A101 | PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MEDIATION RE: [REDACTED]
(TIME SPLIT WITH OTHER FILE IN SAME CASE - "PANORAMA II" - 1287.558). | 0.40 | 74.00 |
| 09/26/2016 | PCB | L120 | A101 | PLAN AND PREPARE (CONTINUE) FOR TODAY'S MEDIATION RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.588 - PANORAMA TOWER II"). | 0.40 | 74.00 |
| | PCB | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.588 - "PANORAMA TOWER II")(NO TRAVEL TIME INCLUDED IN THIS ENTRY). | 2.00 | 370.00 |
| | PCB | L160 | A109 | APPEAR FOR/ATTEND MEDIATION (SEPARATE NON-BILLABLE TRAVEL TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II"). | 0.50 | n/c |
| | DMC | L160 | A109 | TRAVEL TO JAMS TO ATTEND CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.30 | n/c |
| | DMC | L160 | A109 | APPEAR FOR/ATTEND CHAPTER 40 MEDIATION (ATTENDANCE BY DMC AND PCB APPROVED BY CARRIER) (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 2.00 | 330.00 |
| | DMC | L160 | A109 | RETURN TRAVEL FROM JAMS FROM ATTENDANCE AT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO/FILE PURSUANT TO CARRIER'S REQUEST) | 0.40 | n/c |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM SHANE GODFREY (AUDIO VISUAL) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |
| | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM ENDURANCE CLAIMS (EXCESS CARRIER) RE: [REDACTED]
[REDACTED] | 0.10 | 16.50 |

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

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|     |      |      |                                                                                                                                                                                                                                                                                                                                                      | Hours | Amount |
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|     |      |      | REQUEST)                                                                                                                                                                                                                                                                                                                                             | 0.40  | 66.00  |
| DMC | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: GENERAL ALLEGATIONS REGARDING THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION RELATING TO THE ASSOCIATION'S OBLIGATIONS TO DEFEND AND INDEMNIFY CLIENTS IN ANY SUBSEQUENT ACTION INVOLVING THE SETTLED AND RELEASE CLAIMS ((TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)    | 0.20  | 33.00  |
| DMC | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: FIRST CLAIM FOR RELIEF REGARDING WHETHER THE ASSOCIATION'S CLAIMS ARE ALL TIME BARRED BY AB 125 AND/OR WHETHER THE ASSOCIATION HAS STANDING TO BRING CLAIMS INVOLVING WINDOWS (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                  | 0.10  | 16.50  |
| DMC | L210 | A103 | DRAFT/REVISE (SUPPLEMENT) CLIENTS' COMPLAINT RE: THIRD CLAIM FOR RELIEF REGARDING THE ASSOCIATION'S FAILURE TO COMPLY WITH CHAPTER 40 BY NOT SPECIFYING IN DETAIL EACH ALLEGED ALLEGED DEFECT, DAMAGE AND INJURY, INCLUDING THE EXACT LOCATION OF EACH DEFECT DAMAGE AND INJURY (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.10  | 16.50  |
| DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A FIFTH CLAIM FOR RELIEF FOR BREACH OF CONTRACT FOR THE ASSOCIATION'S BREACH OF THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                             | 0.30  | 49.50  |
| DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SIXTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO DEFEND CLIENTS REGARDING THE NEWLY ALLEGED CLAIMS THAT WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                             | 0.50  | 82.50  |
| DMC | L210 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' COMPLAINT RE: ADD A SEVENTH CLAIM FOR RELIEF FOR DECLARATORY RELIEF REGARDING THE ASSOCIATION'S DUTY TO INDEMNIFY CLIENTS REGARDING THE NEWLY ALLEGED CLAIMS THAT WERE RELEASED IN THE PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                        | 0.50  | 82.50  |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                      | 0.05  | 8.25   |
| DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                         | 0.05  | 8.25   |
| 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                                                                                                                                                                                             |       |        |

|            |      |      |      |                                                                                                                                                                                                                                                       | Hours | Amount |
|------------|------|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |      |      |      | PURSUANT TO CARRIER'S REQUEST)(NOTICE/REQUEST APPROVED BY CARRIER)                                                                                                                                                                                    | 0.90  | 148.50 |
| DMC        | L120 | A104 |      | REVIEW/ANALYZE E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                                                                                                         |       |        |
|            |      |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                       | 0.05  | 8.25   |
| DMC        | L250 | A104 |      | REVIEW/ANALYZE INITIAL APPEARANCE FEE DISCLOSURE FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST) | 0.05  | 8.25   |
| DMC        | L250 | A104 |      | REVIEW/ANALYZE CLIENTS' DEMAND FOR JURY TRIAL FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR FILING CLIENTS' COMPLAINT AGAINST THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)    | 0.05  | 8.25   |
| DMC        | L250 | A103 |      | DRAFT/REVISE RESPONSE TO E-MAIL FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]                                                                                                                                               |       |        |
|            |      |      |      | [REDACTED]                                                                                                                                                                                                                                            |       |        |
|            |      |      |      | (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                                  | 0.20  | 33.00  |
| DMC        | L250 | A103 |      | DRAFT/REVISE DETAILED RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (CLIENTS' EXCESS CARRIER) RE: [REDACTED]                                                                                                                                     |       |        |
|            |      |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PURSUANT TO CARRIER'S REQUEST)                                                                                                                                                                       | 0.40  | 66.00  |
| RAB        | L320 | A104 |      | REVIEW/ANALYZE DOCUMENTS RELATING TO CHAPTER 40 MEDIATION, RE: POWER POINT PRESENTATION INFORMATION IN PREPARATION SENDING TO PARTIES IN THE CASE AS PER REQUESTED BY ATTORNEY.                                                                       | 0.30  | 28.50  |
| PCB        | L210 | A103 |      | DRAFT/REVISE (CONTINUE) DECLARATORY RELIEF ACTION RE: ADDITIONAL ALLEGATIONS WITH REGARD TO THE SETTLEMENT AGREEMENT FROM THE ORIGINAL CASE (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - "PANORAMA TOWER II").                               | 0.10  | 18.50  |
| 09/28/2016 | RAB  | L320 | A103 | DRAFT/REVISE EMAIL TO ALL COUNSEL, RE: INFORMATION RELATING TO THE LINK OF THE POWER POINT PRESENTATION. (TIME IS SPLIT WITH THE OTHER FILE 1287.558)                                                                                                 | 0.10  | 9.50   |
|            | RAB  | L320 | A103 | DRAFT/REVISE (CONTINUE) MEMORANDUM OF CALL WITH THE CLARK COUNTY BUILDING DEPARTMENT, RE: ADDING ADDITIONAL INFORMATION RELATING TO FINAL INSPECTION REPORTS. (TIME IS SPLIT WITH THE OTHER FILE 1287.558)                                            | 0.10  | 9.50   |
|            | DMC  | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED]                                                                                                                                                                 |       |        |

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| | | | | Hours | Amount |
|-----|------|------|---|-------|--------|
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| DMC | L120 | A103 | DRAFT/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) | 0.05 | 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] | 0.10 | 16.50 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| 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: [REDACTED] | 0.10 | 16.50 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| 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 CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM AINE MADDEN OF ENDURANCE (EXCESS CARRIER) RE: [REDACTED] | 0.10 | 16.50 |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| 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: [REDACTED] | 0.05 | 8.25 |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L210 | A104 | REVIEW/ANALYZE SUMMONS TO THE ASSOCIATION FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME AS COUNSEL ON BEHALF OF CLIENTS, IN PREPARATION FOR SERVICE ON THE ASSOCIATION WITH CLIENT'S COMPLAINT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO SHERILYN BRYDON OF ESIS (CARRIER) RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |

| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM SHERILYN BRYDON OF ESIS (CARRIER) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 10/03/2016 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING INFORMATION REGARDING THE OUTCOME OF THE CHAPTER 40 MEDIATION INCLUDING SETTLEMENT DISCUSSIONS WITH THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 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. | 0.10 | 18.50 |
| 10/17/2016 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO GRETCHEN DELPH OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: EXPERT'S [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 10/21/2016 | RAB | L340 | A104 | REVIEW/ANALYZE POWER POINT PRESENTATION DOCUMENTS, RE: MEDIATION DOCUMENTS IN PREPARATION FOR CORRESPONDING WITH PLAINTIFF'S COUNSEL. | 0.10 | 9.50 |
| | RAB | L340 | A104 | REVIEW/ANALYZE EMAIL TO PLAINTIFF'S COUNSEL FRANCIS LYNCH, RE: POWER POINT PRESENTATION DOCUMENTS. | 0.10 | 9.50 |
| 10/26/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM JEFF GANZER (CARRIER) RE: | | |

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|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                                        | Hours | Amount   |
|------------|-----|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------|
|            |     |      |      | (TIME SPLIT<br>WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                                                                                                          | 0.05  | 8.25     |
|            | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM JEFF GANZER<br>(CARRIER) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>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'<br>ARCHITECTURAL EXPERT) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                              | 0.05  | 8.25     |
| 11/10/2016 | RAB | L320 | A104 | REVIEW/ANALYZE OUR CLIENT'S PLEADINGS, RE: E-FILED<br>COMPLAINT IN PREPARATION FOR CORRESPONDING WITH<br>DEFENDANT OLDCASTLE BUILDING ENVELOPE FKA TEXAS<br>WALL SYSTEMS.                                                                                                                                                                                                                              | 0.10  | 9.50     |
|            | RAB | L320 | A103 | DRAFT/REVISE EMAIL TO DEFENDANTS OLDCASTLE BUILDING<br>ENVELOPE FKA TEXAS WALL SYSTEMS, RE: INFORMATION<br>RELATING TO THE COMPLAINT.                                                                                                                                                                                                                                                                  | 0.10  | 9.50     |
| 11/22/2016 | PCB | L210 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL<br>FOR THE HOA RE: DISCUSSION OF HIS MEETING WITH THE<br>BOARD AND THE TIMING FOR THE RESPONSE TO THE<br>TENDER OF DEFENSE.                                                                                                                                                                                                                           | 0.10  | 18.50    |
| 11/23/2016 | PCB | L190 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL<br>FOR PLAINTIFF RE: CONTINUED DISCUSSION ABOUT THE<br>TIMING FOR HIS CLIENT'S RESPONSE TO THE TENDER OF<br>DEFENSE, THE TIMING FOR HIS CLIENT'S TENDER OF THE<br>DEC RELIEF ACTION TO THE HOA'S CARRIER, AND THE TIMING<br>OF HIS CLIENT'S FILING OF A RESPONSIVE PLEADING (TIME<br>SPLIT WITH OTHER FILE IN SAME CASE - PANORAMA II -<br>1287.558). | 0.20  | 37.00    |
|            | PCB | L190 | A103 | DRAFT/REVISE EMAIL TO COUNSEL FOR THE HOA RE:<br>CONFIRMATION OF AGREEMENTS REACHED DURING THIS<br>MORNING'S PHONE CONVERSATION.                                                                                                                                                                                                                                                                       | 0.10  | 18.50    |
|            |     |      |      | For Current Services Rendered                                                                                                                                                                                                                                                                                                                                                                          | 38.40 | 6,389.00 |
|            |     |      |      | Total Non-billable Hours                                                                                                                                                                                                                                                                                                                                                                               | 1.20  |          |

## Recapitulation

| Timekeeper         | Title     | Hours | Rate     | Total      |
|--------------------|-----------|-------|----------|------------|
| Peter C. Brown     | PARTNER   | 11.40 | \$185.00 | \$2,109.00 |
| Darlene M. Cartier | ASSOCIATE | 24.50 | 165.00   | 4,042.50   |
| Rachel A. Bounds   | PARALEGAL | 2.50  | 95.00    | 237.50     |

## Expenses

|            |      |      |                                                                                                        |      |
|------------|------|------|--------------------------------------------------------------------------------------------------------|------|
| 09/26/2016 | L100 | E109 | LOCAL TRAVEL (8799) DARLENE M. CARTIER (29.2 MILES AT<br>\$.56/MILE FOR MEDIATION) SPLIT WITH 1287.558 | 8.18 |
|------------|------|------|--------------------------------------------------------------------------------------------------------|------|

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## CHUBB INSURANCE

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| | | | | |
|------------|------|------|---|--------------------|
| 09/29/2016 | L100 | E112 | WIZ-NET (DEMAND FOR JURY TRIAL) | 3.50 |
| 09/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR SEPTEMBER 2016 (1090 PAGES
0.08/PAGE) | 87.20 |
| 10/11/2016 | L100 | E112 | WIZ-NET (SUMMONS PANORAMA TOWERS CONDOMINIUM UNIT
OWNERS' ASSOCIATION) | 3.50 |
| 10/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR OCTOBER 2016 (12 PAGES 0.08/PAGE) | 0.96 |
| 11/03/2016 | L100 | E123 | OTHER PROFESSIONALS (98118) HOLO DISCOVERY (DEPOSITORY
SERVICES) (INVOICE NO. 1457) (SPLIT BETWEEN 1287.551 AND
1287.558) (TRIAL PREPARATION) | 693.75 |
| 11/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR NOVEMBER 2016 (15 PAGES
0.08/PAGE) | 1.20 |
| | | | Total Expenses | 798.29 |
| | | | Total Current Work | 7,187.29 |
| | | | Previous Balance | \$14,503.26 |
| | | | Balance Due | <u>\$21,690.55</u> |

| Aged Due Amounts | | | | | |
|------------------|-------|-------|----------|---------|----------|
| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
| 7,187.29 | 0.00 | 0.00 | 6,158.04 | 0.00 | 8,345.22 |

Task Code Summary

| | | Fees | Expenses |
|------|---|----------|----------|
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 798.29 |
| L120 | ANALYSIS/STRATEGY | 1873.75 | 0.00 |
| L130 | EXPERTS/CONSULTANTS | 28.50 | 0.00 |
| L140 | DOCUMENT/FILE MANAGEMENT | 57.00 | 0.00 |
| L150 | BUDGETING | 66.00 | 0.00 |
| L160 | SETTLEMENT/NON-BINDING ADR | 3169.00 | 0.00 |
| L190 | OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 74.00 | 0.00 |
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 5,268.25 | 798.29 |
| L210 | PLEADINGS | 630.75 | 0.00 |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS | 338.00 | 0.00 |
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS | 968.75 | 0.00 |
| L320 | DOCUMENT PRODUCTION | 133.00 | 0.00 |
| L340 | EXPERT DISCOVERY | 19.00 | 0.00 |
| L300 | DISCOVERY | 152.00 | 0.00 |

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

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AA2790

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

TAX ID # 33-0747275

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

Attn: Sherilyn Brydon

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|            |     |      |      | <u>Fees</u>                                                                                                                                                                                                               |       |        |
|------------|-----|------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            |     |      |      |                                                                                                                                                                                                                           | Hours | Amount |
| 03/21/2016 | PCB | L120 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) [REDACTED]                                                                                                                                                       |       |        |
|            |     |      |      | [REDACTED]                                                                                                                                                                                                                | 0.20  | 35.00  |
|            | PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH JEFFREY GANZER (CHUBB) RE: [REDACTED]                                                                                                                                                   |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                     | 0.10  | 17.50  |
|            | PCB | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH PERSONAL COUNSEL FOR M.J. DEAN AND PERSONAL COUNSEL FOR THE DEVELOPER (2 CALLS) RE: [REDACTED]                                                                                          |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                     | 0.05  | 8.75   |
|            | PCB | L340 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: REQUEST FOR ACCESS TO SITE TO PERFORM EXPERT INVESTIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                       | 0.05  | 8.75   |
| 03/22/2016 | PCB | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH SCOTT WILLIAMS (COUNSEL FOR HOA) RE: DISCUSSION OF THE PROBLEMS ASSOCIATED WITH THE WINDOWS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                          | 0.15  | 26.25  |
|            | PCB | L340 | A101 | PLAN AND PREPARE FOR UPCOMING INSPECTION OF THE NEW ISSUES, [REDACTED]                                                                                                                                                    |       |        |
|            |     |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                     | 0.25  | 43.75  |
| 03/23/2016 | PCB | L340 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE SITE INSPECTION PARAMETERS AND THE BANKRUPTCY OF ONE OF THE DEVELOPER ENTITIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20  | 35.00  |
|            | PCB | L130 | A108 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE SITE INSPECTION                                                                                                                            |       |        |

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|    |      |      |                                                                                                                                                                    | Hours | Amount |
|----|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|    |      |      | PARAMETERS AND THE BANKRUPTCY OF ONE OF THE DEVELOPER ENTITIES. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                         | 0.25  | 43.75  |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S THIRTY SECOND THROUGH THIRTY FIFTH PRODUCTION OF DOCUMENTS- PLAINTIFF'S EXPERT JOB FILE DOCUMENTS AND MATERIALS, RE: [REDACTED]         |       |        |
|    |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              | 0.40  | 48.00  |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-SECOND PRODUCTION OF DOCUMENTS- PANORAMA TOWERS IN-HOUSE WORK ORDERS, RE: [REDACTED]                                              |       |        |
|    |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              | 0.20  | 24.00  |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-FIFTH THROUGH FORTY SIXTH PRODUCTION OF DOCUMENTS- COMPLAINT & REPAIR. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30  | 36.00  |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS- SIERRA GLASS PLANS, [REDACTED]                                                                     |       |        |
|    |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              | 0.20  | 24.00  |
| LK | L320 | A104 | REVIEW/ANALYZE PLAINTIFF'S FIFTY SECOND THROUGH FIFTY FOURTH PRODUCTION OF DOCUMENTS- PANORAMA TOWERS MAINTENANCE SCHEDULES AND WORK ORDERS, [REDACTED]            |       |        |
|    |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              | 0.30  | 36.00  |
| LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FIRST PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIRST BATCH, RE: [REDACTED]                                                             |       |        |
|    |      |      | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              |       |        |

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| | | | | | Hours | Amount |
|------------|----|------|------|--|-------|--------|
| | | | | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 42.00 |
| | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S SECOND PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS SECOND BATCH, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 48.00 |
| 03/24/2016 | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S THIRD PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS THIRD BATCH, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.45 | 54.00 |
| | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FOURTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FOURTH BATCH, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 42.00 |
| | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S FIFTH PRODUCTION OF DOCUMENTS- JOB FILE DOCUMENTS FIFTH BATCH, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.45 | 54.00 |
| | LK | L320 | A104 | REVIEW/ANALYZE MJ DEAN'S SIXTH PRODUCTION OF DOCUMENTS- SIXTH JOB FILE BATCH, RE: [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |
| | | | | [REDACTED] | | |

Panorama Tower II
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 PANORAMA TOWER II
 ~~~SEE NOTES~~~

|     |      |      |                                                                                                                                                                                                                                                                                      | Hours | Amount |
|-----|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| LK  | L320 | A104 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE MJ DEAN'S SEVENTH PRODUCTION OF DOCUMENTS- SEVENTH JOB FILE BATCH, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40  | 48.00  |
| LK  | L320 | A104 | REVIEW/ANALYZE AND OBTAIN INFORMATION, RE: OLDCASTLE, INC. AND OLDCASTLE BUILDING ENVELOPE, [REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                 | 0.45  | 54.00  |
| PCB | L390 | A104 | REVIEW/ANALYZE FILE MATERIALS FROM THE PROJECT AND THE CHAPTER 40 NOTICE IN PREPARATION FOR ATTENDANCE AT SITE INSPECTION WITH EXPERTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                   | 0.30  | 36.00  |
| PCB | L390 | A109 | APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION WITH CLIENTS' EXPERTS (NO TRAVEL TIME INCLUDED IN THIS ENTRY). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                               | 0.30  | 52.50  |
| PCB | L390 | A109 | APPEAR FOR/ATTEND CHAPTER 40 SITE INSPECTION (SEPARATE NON-BILLABLE TRAVEL TIME). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                         | 2.15  | 376.25 |
| PCB | L130 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                              | 0.60  | n/c    |
| JBV | L130 | A108 | COMMUNICATE WITH MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                              | 0.10  | 17.50  |
| JBV | L110 | A108 | COMMUNICATE WITH LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR PANORAMA TOWERS, [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                 | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR PANORAMA TOWERS, [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                         | 0.05  | 6.00   |

Panorama Tower II  
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 ~~~SEE NOTES~~~

| | | | | Hours | Amount |
|-----|------|------|---|-------|--------|
| | | | CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A103 | DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION SERVICES, RE: REQUEST FOR UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES DURING PRIOR CONSTRUCTION DEFECT LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 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 OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES FROM PRIOR CONSTRUCTION DEFECT LITIGATION, RE: DETERMINING IF MJ DEAN CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION, [REDACTED] | | |
| | | | [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR AQUAMATIC, 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 | L130 | A108 | COMMUNICATE WITH CLIENT'S EXPERT, SHELLY ROBBINS, RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L130 | A104 | REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: [REDACTED] | | |
| | | | [REDACTED] TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S INITIAL PRODUCTION OF DOCUMENTS (P0000001-P0000856), RE: [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |

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PANORAMA TOWER II
~~~SEE NOTES~~~

|     |      |      |                                                                                                                                                                                                                                           | Hours | Amount |
|-----|------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S SECOND PRODUCTION OF DOCUMENTS<br>(P0000857-P0001544), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S THIRD PRODUCTION OF DOCUMENTS<br>(P0001545-P0001612), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)  | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FOURTH PRODUCTION OF DOCUMENTS<br>(P0001613-P0002486), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTH PRODUCTION OF DOCUMENTS<br>(P0002487-P0002498), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)   | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S SIXTH PRODUCTION OF DOCUMENTS (P0002499),<br>RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PER CARRIER REQUEST)           | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S SEVENTH PRODUCTION OF DOCUMENTS<br>(P0002500-P2527), RE: [REDACTED]<br>[REDACTED]                                                                                                |       |        |

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 PANORAMA TOWER II  
 ~~~SEE NOTES~~~

| | | | | Hours | Amount |
|-----|------|------|---|-------|--------|
| | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S EIGHTH PRODUCTION OF DOCUMENTS
(P0002528-P003351), RE: | 0.05 | 6.00 |
| | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S NINTH PRODUCTION OF DOCUMENTS
(P0003352-P0007044), RE: | 0.15 | 18.00 |
| | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TENTH PRODUCTION OF DOCUMENTS
(P0007045-P0008427), RE: | 0.20 | 24.00 |
| | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S ELEVENTH PRODUCTION OF DOCUMENTS
(P0008428-P0010290), RE: | 0.15 | 18.00 |
| | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S TWELFTH PRODUCTION OF DOCUMENTS
(P0010291-P0010602), RE: | 0.20 | 24.00 |
| | | | (TIME SPLIT WITH OTHER CLAIM | | |

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 ~~~SEE NOTES~~~

|     |      |      |                                                                                                                                                                                                   | Hours | Amount |
|-----|------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|     |      |      | NO./FILE PER CARRIER REQUEST)                                                                                                                                                                     | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S THIRTEENTH PRODUCTION OF DOCUMENTS<br>(P0010603-P0010891), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH  |       |        |
|     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                         | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FOURTEENTH PRODUCTION OF DOCUMENTS<br>(P0010892-P0011105), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH  |       |        |
|     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                         | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTEENTH PRODUCTION OF DOCUMENTS<br>(P0011106-P0011431), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH   |       |        |
|     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                         | 0.10  | 12.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S SIXTEENTH PRODUCTION OF DOCUMENTS<br>(P0011432-P0013410), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH   |       |        |
|     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                         | 0.15  | 18.00  |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S SEVENTEENTH PRODUCTION OF DOCUMENTS<br>(P0013411-P0013574), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH |       |        |
|     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                         | 0.05  | 6.00   |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S EIGHTEENTH PRODUCTION OF DOCUMENTS<br>(P0013575-P13684), RE: [REDACTED]<br>[REDACTED]                                                    |       |        |



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| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | 0.05 | 6.00 |
| | | | PLAINTIFF'S NINETEENTH PRODUCTION OF DOCUMENTS | | |
| | | | (P0013685-P0015665), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | 0.15 | 18.00 |
| | | | PLAINTIFF'S TWENTIETH PRODUCTION OF DOCUMENTS | | |
| | | | (P0015666-P0015963), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | 0.05 | 6.00 |
| | | | PLAINTIFF'S TWENTY-FIRST PRODUCTION OF DOCUMENTS | | |
| | | | (P0015964-P16520), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | 0.15 | 18.00 |
| | | | PLAINTIFF'S TWENTY-SECOND PRODUCTION OF DOCUMENTS | | |
| | | | (P0016521-P0016656), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | | |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | 0.05 | 6.00 |
| | | | PLAINTIFF'S TWENTY-THIRD PRODUCTION OF DOCUMENTS | | |
| | | | (P0016657-P0016743), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |

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 PANORAMA TOWER II
 ~~~SEE NOTES~~~

|     |      |      |                                                                                                                                                                                                                                                                            | Hours | Amount |
|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| JBV | L110 | A104 | OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-FOURTH PRODUCTION OF DOCUMENTS<br>(P0016744-P0016862), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH                           | 0.05  | 6.00   |
| JBV | L110 | A104 | OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-FIFTH PRODUCTION OF DOCUMENTS<br>(P0016863-P0018381), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH                            | 0.05  | 6.00   |
| JBV | L110 | A104 | OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-SIXTH PRODUCTION OF DOCUMENTS<br>(P0018382-P0019204), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH                            | 0.15  | 18.00  |
| JBV | L110 | A104 | OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-SEVENTH PRODUCTION OF<br>DOCUMENTS (P0019205-P0019212), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER | 0.10  | 12.00  |
| JBV | L110 | A104 | CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-EIGHTH PRODUCTION OF DOCUMENTS<br>(P0019213-P0019224), RE: [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER                           | 0.05  | 6.00   |
| JBV | L110 | A104 | CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S TWENTY-NINTH PRODUCTION OF DOCUMENTS<br>(P0019225-P0020007), RE: [REDACTED]                                                                                                                   | 0.05  | 6.00   |

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 5143220827859X-A  
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 ~~~SEE NOTES~~~

| | | | | | Hours | Amount |
|------------|------|------|---|---|-------|--------|
| | | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 18.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S THIRTIETH PRODUCTION OF DOCUMENTS
(P0020008-P0020242), RE: | | | |
| | | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S THIRTY-FIRST PRODUCTION OF DOCUMENTS
(P0020243-P0021372), RE: | | | |
| | | | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| 03/25/2016 | JBV | L110 | A104 | COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, SHELLY
ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: | | |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN
PLAINTIFF'S FIFTY-SEVENTH PRODUCTION OF DOCUMENTS
(P0069102-69107), RE: | | | |
| | | | | (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: | | | |

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 PANORAMA TOWER II
 ~~~SEE NOTES~~~

|     |      |      |                                                                                                                                                                                                                                                                                                                                                                                        | Hours | Amount |
|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTY-FIFTH PRODUCTION OF DOCUMENTS<br>(P0068437-68452), RE: <div style="background-color: black; width: 250px; height: 1.2em; display: inline-block;"></div>  | 0.20  | 24.00  |
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTY-FOURTH PRODUCTION OF DOCUMENTS<br>(P0067635-68436), RE: <div style="background-color: black; width: 250px; height: 1.2em; display: inline-block;"></div> | 0.05  | 6.00   |
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTY-THIRD PRODUCTION OF DOCUMENTS<br>(P0067532-67634), RE: <div style="background-color: black; width: 250px; height: 1.2em; display: inline-block;"></div>  | 0.20  | 24.00  |
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTY-SECOND PRODUCTION OF DOCUMENTS<br>(P0061805-67531), RE: <div style="background-color: black; width: 250px; height: 1.2em; display: inline-block;"></div> | 0.10  | 12.00  |
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTY-FIRST PRODUCTION OF DOCUMENTS<br>(P0061656-61804), RE: <div style="background-color: black; width: 250px; height: 1.2em; display: inline-block;"></div>  | 0.35  | 42.00  |
| JBV | L110 | A104 | <div style="background-color: black; width: 400px; height: 1.2em; margin-bottom: 2px;"></div> (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN<br>PLAINTIFF'S FIFTIETH PRODUCTION OF DOCUMENTS                                                                                                                               | 0.15  | 18.00  |

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~~~SEE NOTES~~~

| | | | | Hours | Amount |
|-----|------|------|--|-------|--------|
| | | | (P0061534-61655), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | | |
| | | | PLAINTIFF'S FORTY-NINTH PRODUCTION OF DOCUMENTS | | |
| | | | (P0061330-61533), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN | | |
| | | | PLAINTIFF'S FORTY-EIGHTH PRODUCTION OF DOCUMENTS | | |
| | | | (P0054588-61329), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH | | |
| | | | OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.45 | 54.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE SIERRA GLASS PLANS AS DISCLOSED BY | | |
| | | | PLAINTIFF'S COUNSEL (P0061254-61329), RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| | | | CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A108 | COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, KEN | | |
| | | | REID, RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM | | |
| | | | NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE PLAINTIFF'S NRS CHAPTER 40 | | |
| | | | CORRESPONDENCE TO CLIENT, MJ DEAN DATED FEBRUARY | | |
| | | | 24, 2016. RE: [REDACTED] | | |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| | | | CARRIER REQUEST) | 0.15 | 18.00 |
| JBV | L110 | A104 | REVIEW/ANALYZE CORPORATE INFORMATION FOR TEXAS | | |

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|     |      |      |  |                                                      | Hours | Amount |
|-----|------|------|--|------------------------------------------------------|-------|--------|
|     |      |      |  | WALL SYSTEMS, RE: [REDACTED]                         |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT                               |       |        |
|     |      |      |  | WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)       | 0.05  | 6.00   |
| JBV | L110 | A103 |  | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO TEXAS      |       |        |
|     |      |      |  | WALL SYSTEMS, RE: [REDACTED]                         |       |        |
|     |      |      |  | [REDACTED] (TIME                                     |       |        |
|     |      |      |  | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 6.00   |
| JBV | L110 | A104 |  | REVIEW/ANALYZE CORPORATE INFORMATION FOR BOMBARD     |       |        |
|     |      |      |  | MECHANICAL, RE: [REDACTED]                           |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT WITH OTHER                    |       |        |
|     |      |      |  | CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 6.00   |
| JBV | L110 | A103 |  | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO            |       |        |
|     |      |      |  | BOMBARD MECHANICAL, RE: [REDACTED]                   |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT WITH OTHER                    |       |        |
|     |      |      |  | CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 6.00   |
| JBV | L110 | A104 |  | REVIEW/ANALYZE CORPORATE INFORMATION FOR INSULPRO    |       |        |
|     |      |      |  | PROJECTS, RE: [REDACTED]                             |       |        |
|     |      |      |  | [REDACTED] (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: [REDACTED]                    |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT WITH OTHER                    |       |        |
|     |      |      |  | CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 6.00   |
| JBV | L110 | A104 |  | REVIEW/ANALYZE CORPORATE INFORMATION FOR FLIPPIN'S   |       |        |
|     |      |      |  | TRENCHING, RE: [REDACTED]                            |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT WITH OTHER                    |       |        |
|     |      |      |  | CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 6.00   |
| JBV | L110 | A103 |  | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO FLIPPIN'S  |       |        |
|     |      |      |  | TRENCHING, RE: [REDACTED]                            |       |        |
|     |      |      |  | [REDACTED] (TIME                                     |       |        |
|     |      |      |  | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 6.00   |
| JBV | L110 | A104 |  | REVIEW/ANALYZE CORPORATE INFORMATION FOR             |       |        |
|     |      |      |  | VICTAULIC, RE: [REDACTED]                            |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT WITH OTHER                    |       |        |
|     |      |      |  | CLAIM NO./FILE PER CARRIER REQUEST)                  | 0.05  | 6.00   |
| JBV | L110 | A103 |  | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO            |       |        |
|     |      |      |  | VICTAULIC, RE: [REDACTED]                            |       |        |
|     |      |      |  | [REDACTED] (TIME                                     |       |        |
|     |      |      |  | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 6.00   |
| JBV | L110 | A104 |  | REVIEW/ANALYZE CORPORATE INFORMATION FOR SIERRA      |       |        |
|     |      |      |  | GLASS & MIRROR, RE: [REDACTED]                       |       |        |
|     |      |      |  | [REDACTED] (TIME SPLIT                               |       |        |

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| | | | | Hours | Amount |
|------------|------|------|---|-------|--------|
| | | | WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO SIERRA GLASS & MIRROR, RE: [REDACTED] | | |
| | | | [REDACTED] (TIME | | |
| JBV | L110 | A103 | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] | | |
| | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A103 | DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO OLDCASTLE, INC., RE: [REDACTED] | | |
| | | | [REDACTED] (TIME | | |
| JBV | L110 | A104 | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) REVIEW/ANALYZE CORPORATE INFORMATION FOR CULLIGAN WATER (TWO ENTITIES), RE: [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] (TIME SPLIT | | |
| JBV | L110 | A103 | WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN WATER COMPANY OF NEVADA, INC. ALSO KNOWN AS CULLIGAN WATER COMPANY, LLC, RE: [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| JBV | L110 | A103 | CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO CULLIGAN PURE WATER ALSO KNOWN AS CULLIGAN WATER CONDITIONING OF LAS VEGAS, NEVADA, RE: [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| JBV | L110 | A103 | CARRIER REQUEST) DRAFT/REVISE CHAPTER 40 CORRESPONDENCE TO AQUAMATIC, RE: [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] (TIME | | |
| PCB | L250 | A104 | SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER 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 [REDACTED] | 0.05 | 6.00 |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER | | |
| | | | CARRIER REQUEST) | 0.60 | 105.00 |
| 03/28/2016 | PCB | L390 | A103 DRAFT/REVISE LETTER TO COUNSEL FOR PLAINTIFF RE: DISCUSSION OF THE LACK OF NECESSARY INFORMATION IN THE NEW CHAPTER 40 NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 17.50 |

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|            |     |      |      |                                                                                                                                                                                                                        | Hours | Amount |
|------------|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | PCB | L240 | A104 | REVIEW/ANALYZE STATUTORY PROVISIONS IN CONJUNCTION WITH PLAINTIFF'S NEW CHAPTER 40 NOTICE [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                          | 0.35  | 61.25  |
| 03/29/2016 | PCB | L340 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: ISSUES OVER THE WATER TESTING THAT IS BEING PERFORMED WITHOUT PROPER NOTICE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                   | 0.20  | 35.00  |
|            | PCB | L340 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                          | 0.10  | 17.50  |
|            | PCB | L340 | A104 | REVIEW/ANALYZE EMAIL FROM MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                  | 0.05  | 8.75   |
| 03/30/2016 | PCB | L190 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR CULLIGAN AND PROVIDE REQUESTED DOCUMENTS IN RESPONSE TO REQUEST FOR SAME. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                             | 0.05  | 8.75   |
|            | PCB | L190 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH JORGE RAMIREZ (COUNSEL FOR CULLIGAN) RE: INITIAL DISCUSSION OF THE CLAIMS PERTAINING TO CULLIGAN'S FERROUS PARTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST). | 0.10  | 17.50  |
|            | LK  | L320 | A103 | DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE TO FLIPPINS TRENCHING. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                                                      | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO INSULPRO PROJECTS, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST).                                                    | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                      | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                          | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO SIERRA GLASS & MIRROR, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                           | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO TEXAS WALL SYSTEMS, INC., RE: AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                              | 0.10  | 12.00  |
|            | LK  | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO VICTAULIC, INC., RE:                                                                                                                                                                    |       |        |



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| | | | | | Hours | Amount |
|------------|------|------|------|--|-------|--------|
| | | | | AMENDED NEVADA REVISED STATUTE CHAPTER 40 LETTER.
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 | | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE
FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA
TOWERS I, LLC AND PANORAMA TOWERS II, LLC, RE:
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A103 | | DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40
CORRESPONDENCE TO AQUAMATIC, RE: PROVIDING NRS
[REDACTED]
(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A103 | | DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40
CORRESPONDENCE TO BOMBARD MECHANICAL, RE:
[REDACTED]
(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: [REDACTED]
[REDACTED] (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: [REDACTED]
[REDACTED] (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:
[REDACTED]
[REDACTED] (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:
[REDACTED]
[REDACTED]
[REDACTED] (TIME SPLIT WITH | | |

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|            |     |      |      |                                                                                                                                                                                                                                                                                          | Hours | Amount |
|------------|-----|------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | JBV | L320 | A104 | OTHER CLAIM NO./FILE PER CARRIER REQUEST)<br>REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE<br>FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN<br>CONSTRUCTION, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT<br>WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                       | 0.05  | 6.00   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE<br>FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER<br>DEVELOPMENT, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT<br>WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                     | 0.05  | 6.00   |
| 04/07/2016 | PCB | L190 | A104 | REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC AND<br>PREPARE EMAIL IN RESPONSE TO SAME [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER<br>CARRIER REQUEST)                                                                                                          | 0.05  | 8.75   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS<br>CHAPTER 40 CORRESPONDENCE SERVED ON AQUAMATIC<br>COVER SYSTEMS VIA CERTIFIED MAIL, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PER CARRIER REQUEST)                                         | 0.05  | 6.00   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS<br>CHAPTER 40 CORRESPONDENCE SERVED ON BOMBARD<br>MECHANICAL VIA CERTIFIED MAIL, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PER CARRIER REQUEST)                                              | 0.05  | 6.00   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS<br>CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN<br>PURE WATER/CULLIGAN WATER CONDITIONING OF LAS<br>VEGAS VIA CERTIFIED MAIL, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PER CARRIER REQUEST) | 0.05  | 6.00   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS<br>CHAPTER 40 CORRESPONDENCE SERVED ON CULLIGAN<br>WATER COMPANY OF NEVADA VIA CERTIFIED MAIL, RE: [REDACTED]<br>[REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER<br>CLAIM NO./FILE PER CARRIER REQUEST)                                | 0.05  | 6.00   |
|            | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS                                                                                                                                                                                                                                        | 0.05  | 6.00   |

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| | | | | | Hours | Amount |
|-----|------|------|--|--|-------|--------|
| | | | | CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S
TRENCHING VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS
CHAPTER 40 CORRESPONDENCE SERVED ON OLD CASTLE
BUILDING ENVELOPE VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM INITIAL NRS
CHAPTER 40 CORRESPONDENCE SERVED ON VICTAULIC VIA
CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RETURNED INITIAL NRS CHAPTER 40
CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON
SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS
CHAPTER 40 CORRESPONDENCE SERVED ON FLIPPIN'S
TRENCHING VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RESPONSE RECEIVED FROM SECOND NRS
CHAPTER 40 CORRESPONDENCE SERVED ON INSULPRO
PROJECTS VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A104 | | REVIEW/ANALYZE RETURNED SECOND NRS CHAPTER 40
CORRESPONDENCE INDICATING ATTEMPTED SERVICE ON
SIERRA GLASS AND MIRROR VIA CERTIFIED MAIL, RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L320 | A103 | | DRAFT/REVISE UPDATE INFORMATION INTO CLIENTS'
SUMMARY OF NRS CHAPTER 40 CORRESPONDENCE (11
TOTAL), RE: [REDACTED] | | |
| | | | | [REDACTED] (TIME SPLIT WITH | | |

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|            |     |      |      | OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                            | Hours<br>0.15 | Amount<br>18.00 |
|------------|-----|------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------|
| 04/12/2016 | DMC | L320 | A103 | DRAFT/REVISE CORRESPONDENCE TO AQUAMATIC RE:<br>[REDACTED] (TIME SPLIT<br>WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                             | 0.15          | 26.25           |
|            | DMC | L120 | A109 | APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS<br>(ARCHITECT) RE: [REDACTED]<br>[REDACTED] ENTRY DOES NOT INCLUDE<br>TRAVEL) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER<br>CARRIER REQUEST)                                          | 0.20          | 35.00           |
|            | PCB | L130 | A109 | APPEAR FOR/ATTEND MEETING WITH MICHELLE ROBBINS<br>(CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE<br>PER CARRIER REQUEST)                                                        | 0.20          | 35.00           |
|            | PCB | L130 | A104 | REVIEW/ANALYZE DOCUMENTS PROVIDED BY EXPERT<br>(MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND<br>WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS<br>[REDACTED] (TIME<br>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<br>(MICHELLE ROBBINS) WITH REGARD TO EFIS, CAULKING AND<br>WINDOWS, AND COMPARE SAME TO OTHER FILE MATERIALS<br>[REDACTED] (TIME<br>SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10          | 12.00           |
|            | JBV | L320 | A103 | DRAFT/REVISE NRS CHAPTER 40 CORRESPONDENCE TO<br>FORD CONTRACTING, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH<br>OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                        | 0.10          | 12.00           |
|            | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE<br>FROM PLAINTIFF'S COUNSEL TO CLIENT, HALLIER<br>DEVELOPMENT/PANORAMA TOWERS I AND II, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM<br>NO./FILE PER CARRIER REQUEST)      | 0.05          | 6.00            |
|            | JBV | L320 | A104 | REVIEW/ANALYZE NRS CHAPTER 40 CORRESPONDENCE<br>FROM PLAINTIFF'S COUNSEL TO CLIENT, MJ DEAN<br>CONSTRUCTION, RE: [REDACTED]<br>[REDACTED] (TIME<br>SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                              | 0.05          | 6.00            |

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| | | | | | Hours | Amount |
|------------|-----|------|------|---|-------|--------|
| 04/14/2016 | PCB | L110 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR GENERAL CONTRACTOR RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| 04/22/2016 | PCB | L120 | A101 | PLAN AND PREPARE FOR NEXT STEPS OF DEFENSE INCLUDING HOW TO PUSH PLAINTIFF'S COUNSEL TO PROVIDE MISSING INFORMATION, [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.25 | 43.75 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE BUILDING ENVELOPE, RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RESPONSE MAIL RECEIVED FROM OLD CASTLE, INC., RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE RETURNED MAIL RECEIVED FROM FORD CONTRACTING, INC., RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L320 | A103 | DRAFT/REVISE ADDITIONAL INFORMATION TO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L320 | A104 | REVIEW/ANALYZE OCIP LIST RECEIVED FROM ADJUSTER, RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L320 | A103 | DRAFT/REVISE OCIP COVERAGE INFORMATION INTO CLIENTS' SUMMARY OF CHAPTER 40 CORRESPONDENCE TO SELECT SUBCONTRACTORS AND MANUFACTURERS, RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |

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|            |     |      |      |                                                                                                                                                                                                                                                                                                                                                                                               | Hours | Amount |
|------------|-----|------|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
| 04/25/2016 | DMC | L120 | A104 | REVIEW/ANALYZE CORESSPONDENCE FROM ATTORNEY ROBERT SCHUMACHER RE: [REDACTED]<br>[REDACTED] (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 DEFECTS AND DESCRIPTION OF EACH DEFECT (RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER FIRE BLOCKING, MECHANICAL ROOM PIPING, AND SEWER PROBLEMS IN PREPARATION FOR DRAFTING DEFECT LIST SUMMARY. (APPROXIMATELY 52 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35  | 42.00  |
|            | RAB | L320 | A103 | DRAFT/REVISE (BEGIN) DEFECT LIST SUMMARY AND COST OF REPAIR SUMMARY, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                  | 0.30  | 36.00  |
| 04/29/2016 | RAB | L110 | A104 | REVIEW/ANALYZE US BANKRUPTCY COURT DOCUMENTS, RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                                                                         | 0.10  | 12.00  |
|            | RAB | L110 | A103 | DRAFT/REVISE EMAIL TO JACOB HOUMAND AND VICTORIA NELSON, COUNSEL FOR OUR CLIENT'S IN BANKRUPTCY COURT, RE: [REDACTED]. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                             | 0.05  | 6.00   |
|            | DMC | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO ENDURANCE SPECIALTY INSURANCE COMPANY (CLIENTS' EXCESS CARRIER) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                                                        | 0.45  | 78.75  |
|            | DMC | L120 | A103 | DRAFT/REVISE CORRESPONDENCE TO ED SONG AND SCOTT WILLIAMS (COUNSEL FOR THE ASSOCIATION) RE: DEMAND FOR INFORMATION AND DOCUMENTS RELATING TO ALLEGED CHAPTER 40 DEFECTS AS REQUIRED BY STATUTE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                    | 0.15  | 26.25  |
|            | DMC | L120 | A107 | COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH BOBBY THOMPSON (COUNSEL FOR TEXAS WALL SYSTEMS NOW KNOWN AS OLDCASTLE BUILDINGENVELOPE) RE: [REDACTED]<br>[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                                                                                                                                                      | 0.15  | 26.25  |
| 05/02/2016 | DMC | L120 | A104 | REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT RE: [REDACTED]<br>[REDACTED]                                                                                                                                                                                                                                                                          |       |        |

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 ~~~SEE NOTES~~~

| | | | | Hours | Amount |
|-----|------|------|--|-------|--------|
| DMC | L120 | A104 | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)
REVIEW/ANALYZE CLIENTS' OCIP MANUAL [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT MJ DEAN IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 35.00 |
| DMC | L120 | A104 | REVIEW/ANALYZE CHAPTER 40 NOTICE TO CLIENT HALLIER PROPERTIES IN PREPARATION FOR DRAFTING INITIAL STATUS REPORT TO CARRIER AND CLIENTS (51 PAGES) (TIME SPLIT BETWEEN CLIENTS) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.25 | 43.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE CORRESPONDENCE FROM MARTIN LITTLE (PERSONAL COUNSEL FOR CLIENT MJ DEAN) RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.25 | 43.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE BANKRUPTCY PETITION FOR CLIENT/INSURED PANORAMA TOWERS II, LLC TO DETERMINE POTENTIAL IMPACT ON CLAIMS AND IN PREPARATION FOR INITIAL STATUS REPORT TO CARRIER AND CLIENTS (6 PAGES). (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE PRIOR SETTLEMENT AGREEMENT AND RELEASE FOR SETTLEMENT OF PRIOR LITIGATION FOR CONSTRUCTION DEFECT CLAIMS, INCLUDING ATTACHED FINDINGS OF FACT AND COURT ORDER BARRING CERTAIN CLAIMS INVOLVING SEPARATE INTEREST PROPERTY AT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS ASSOCIATION [REDACTED] (21 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 17.50 |
| DMC | L120 | A104 | DRAFT/REVISE (BEGIN) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 35.00 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 26.25 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 26.25 |
| | | | [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.45 | 78.75 |

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 PANORAMA TOWER II
 ~~~SEE NOTES~~~

|            |     |      |      |                                                                                                                                                                      | Hours | Amount |
|------------|-----|------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------|
|            | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                   | 0.35  | 61.25  |
|            | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:<br>[REDACTED]<br>TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                    | 0.30  | 52.50  |
|            | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) INITIAL REPORT TO CARRIERS RE:<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                   | 0.25  | 43.75  |
|            | RAB | L110 | A104 | REVIEW/ANALYZE LITIGATION SERVICES DOCUMENTS, RE:<br>DEPOSITORY INDEX DOCUMENTS [REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)             | 0.10  | 12.00  |
|            | RAB | L110 | A103 | DRAFT/REVISE EMAIL TO LITIGATION SERVICES, RE:<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                           | 0.05  | 6.00   |
|            | RAB | L110 | A104 | REVIEW/ANALYZE RESPONSE EMAIL FROM LITIGATION SERVICES, RE:<br>[REDACTED]<br>TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                               | 0.05  | 6.00   |
|            | RAB | L110 | A103 | DRAFT/REVISE RESPONSE EMAIL TO LITIGATION SERVICES, RE:<br>[REDACTED]<br>TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                   | 0.05  | 6.00   |
|            | RAB | L110 | A104 | REVIEW/ANALYZE DOCUMENTS FROM LITIGATION SERVICES, RE:<br>[REDACTED]<br>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)                                   | 0.05  | 6.00   |
| 05/03/2016 | RAB | L110 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH BANKRUPTCY ATTORNEY JOSHUA HOUMAND, RE: [REDACTED]<br>(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:<br>[REDACTED]<br>TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10  | 17.50  |



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 ~~~SEE NOTES~~~

| | | | | | Hours | Amount |
|------------|-----|------|------|--|-------|----------|
| | PCB | L120 | A104 | REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.25 | 43.75 |
| 05/16/2016 | PCB | L250 | A104 | REVIEW/ANALYZE PORTIONS OF AB 125 [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.45 | 78.75 |
| 05/20/2016 | RAB | L110 | A104 | REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4525 DEAN MARTIN DRIVE [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 48.00 |
| | RAB | L110 | A104 | REVIEW/ANALYZE CLARK COUNTY BUILDING DEPARTMENT DOCUMENTS, RE: CERTIFICATE OF OCCUPANCY, CERTIFICATE OF COMPLETION, AND FINAL INSPECTION DOCUMENTS RELATING TO 4575 DEAN MARTIN DRIVE [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 42.00 |
| 05/21/2016 | DMC | L120 | A103 | DRAFT/REVISE (BEGIN) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: NOTICE OF CLIENT BANKRUPTCY AND AUTOMATIC STAY OF CLAIMS, OBJECTION TO NOTICE INCLUDING DEFICIENCY OF NOTICE AND FAILURE TO MEET NEW STATUTORY REQUIREMENTS, ANALYSIS OF APPLICATION OF STATUTE OF REPOSE TIME BARRING ALL OF THE ASSOCIATION'S CLAIMS (3 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.65 | 113.75 |
| | DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE RE: CLIENTS' DETAILED RESPONSE TO EACH OF THE ALLEGED DEFECTS INCLUDING THE BASIS FOR DISCLAIMING ANY LIABILITY (5 OF 9 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.80 | 140.00 |
| | | | | [REDACTED] | | |
| 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. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 26.25 |
| | | | | For Current Services Rendered | 27.95 | 4,044.25 |
| | | | | Total Non-billable Hours | 0.60 | |

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 PANORAMA TOWER II
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Recapitulation

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

Expenses

|            |      |      |                                                                       |                   |
|------------|------|------|-----------------------------------------------------------------------|-------------------|
| 03/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR MARCH 2016 (1927 PAGES AT .08/PAGE)            | 77.08             |
| 04/30/2016 | L100 | E101 | REPRODUCTION COSTS FOR APRIL 2016 (141 PAGES AT .08/PAGE)             | 5.64              |
| 05/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR MAY 2016 (1141 PAGES AT .08/PAGE)              | 45.64             |
|            |      |      | Total Expenses                                                        | 128.36            |
|            |      |      | Total Current Work                                                    | 4,172.61          |
|            |      |      | Previous Balance before Adjustments                                   | \$8,088.43        |
| 03/07/2017 |      |      | WRITE-OFF (WRITE OFF STMT 1 TO RE-ENTER TIME FROM 1287.551 AND SPLIT) | -4,361.31         |
|            |      |      | Previous Balance                                                      | \$3,727.12        |
|            |      |      | Balance Due                                                           | <u>\$7,899.73</u> |

Aged Due Amounts

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

Task Code Summary

|                                                          | <u>Fees</u> | <u>Expenses</u> |
|----------------------------------------------------------|-------------|-----------------|
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 0.00        | 128.36          |
| L110 FACT INVESTIGATION/DEVELOPMENT                      | 971.00      | 0.00            |
| L120 ANALYSIS/STRATEGY                                   | 1067.50     | 0.00            |
| L130 EXPERTS/CONSULTANTS                                 | 178.75      | 0.00            |
| L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 35.00       | 0.00            |
| L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION     | 2,252.25    | 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                                 | 908.25      | 0.00            |
| L330 DEPOSITIONS                                         | 8.75        | 0.00            |
| L340 EXPERT DISCOVERY                                    | 157.50      | 0.00            |
| L390 OTHER DISCOVERY                                     | 446.25      | 0.00            |
| L300 DISCOVERY                                           | 1,520.75    | 0.00            |

ESIS Dallas AGL Claims

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Account No: 1287-5581M  
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~~~SEE NOTES~~~

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

0108

AA2817

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

TAX ID # 33-0747275

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

Attn: Jeff Ganzer

Panorama Tower I

PANORAMA TOWER I

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Account No: 1287-5511V
Statement No: 4

| | | | | <u>Fees</u> | Hours | |
|------------|-----|------|------|---|-------|-------|
| 12/05/2016 | PCB | L190 | A104 | REVIEW/ANALYZE EMAILS (2) FROM COUNSEL FOR S N PAVING AND PREPARE EMAILS (2) BACK TO COUNSEL DISCUSSING THE OUTCOME OF THE MEDIATION, THE DEC RELIEF ACTION, PLAINTIFF'S LIKELY RESPONSIVE PLEADING, AND S N PAVING'S POTENTIAL INCLUSION IN THE CASE. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 18.50 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL WITH ENCLOSURE FROM BRUCE EDWARDS (MEDIATOR) RE: RECENT CHAPTER 40 MEDIATION, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: CLIENTS' DEMAND FOR THE HOA'S RESPONSE TO CLIENT'S COMPLAINT AGAINST THE HOA (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 12/06/2016 | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: THE HOA'S FORTHCOMING RESPONSE TO CLIENT'S COMPLAINT AGAINST THE HOA) PENDING) OUR CLIENTS' REVIEW OF THE HOA'S RESPONSE TO CLIENTS' TENDER OF DEFENSE, 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 |

CHUBB INSURANCE

Panorama Tower I

PANORAMA TOWER I

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| | | | | Hours | | |
|------------|-----|------|------|---|------|------|
| 12/07/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: REQUESTING CASE STATUS IN ORDER TO DETERMINE WHAT RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A103 | DRAFT/REVISE RESPONSE TO E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: RECENT CASE DEVELOPMENTS INCLUDING THE HOA'S RESPONSE TO CLIENTS' TENDER AND THE HOA'S FORTHCOMING RESPONSE TO CLIENTS' DECLARATORY RELIEF COMPLAINT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CARL HOUSTON (COUNSEL FOR CULLIGAN) RE: ADDITIONAL DISCUSSION REGARDING RECENT CASE DEVELOPMENTS INCLUDING THE HOA'S RESPONSE TO CLIENTS' TENDER AND THE HOA'S FORTHCOMING RESPONSE TO CLIENTS' DECLARATORY RELIEF COMPLAINT, IN ORDER TO DETERMINE IF ANY FURTHER RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 12/14/2016 | DMC | L240 | A104 | REVIEW/ANALYZE STIPULATION AND ORDER TO CONTINUE HEARING ON THE HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA (PREPARED BY LEGAL ASSISTANT C. WILLIAMS) FOR COMPLETENESS AND ACCURACY AND REVISE AND SUPPLEMENT SAME, IN PREPARATION FOR SUBMISSION TO ALL COUNSEL (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) RE: REQUESTING CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 12/15/2016 | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL FROM DANIEL BUCHER OF ENDURANCE SPECIALTY (CLIENTS' EXCESS CARRIER) [REDACTED] | | |

| | | | | Hours | |
|------------|-----|------|------|---|-----------|
| | DMC | L120 | A103 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)
DRAFT/REVISE RESPONSE TO E-MAIL FROM DANIEL BUCHER OF ENDURANCE SPECIALTY (CLIENTS' EXCESS CARRIER) RE: | 0.05 8.25 |
| | | | A104 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)
REVIEW/ANALYZE ADDITIONAL E-MAIL FROM DANIEL BUCHER OF ENDURANCE SPECIALTY (CLIENTS' EXCESS CARRIER) RE: | 0.05 8.25 |
| | | | A104 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| 12/19/2016 | DMC | L240 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE HOA) RE: STIPULATION TO CONTINUE HEARING ON THE HOA'S MOTION TO DISMISS CLIENTS' DECLARATORY RELIEF COMPLAINT AGAINST THE HOA, 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 CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION PURSUANT TO MEDIATOR'S REQUEST (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| | DMC | L160 | A104 | REVIEW/ANALYZE ADDITIONAL E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION IN ORDER TO DETERMINE WHETHER ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER | 0.05 8.25 |

CHUBB INSURANCE

Panorama Tower I

PANORAMA TOWER I

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| | | | | CLAIM NO./FILE PER CARRIER REQUEST) | Hours | |
|------------|-----|------|------|--|-------|------|
| | | | | | 0.05 | 8.25 |
| 12/20/2016 | DMC | L160 | A104 | REVIEW/ANALYZE FURTHER E-MAIL FROM CAIRO PERSON OF BRUCE EDWARDS (MEDIATOR) WITH COPY TO THE HOA'S COUNSEL RE: CASE STATUS FOLLOWING RECENT CHAPTER 40 MEDIATION IN ORDER TO DETERMINE WHETHER ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (HOA'S COUNSEL) RE: HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA, IN ORDER TO DETERMINE WHAT ACTION OR RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM THE COURT RE: THE PARTIES' STIPULATION TO CONTINUE THE HEARING ON HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA, IN ORDER TO DETERMINE WHAT ACTION OR RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 12/21/2016 | DMC | L120 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF COURT ORDER RE: HEARING ON THE HOA'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF AGAINST THE HOA (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARATION FOR SERVICE ON ALL PARTIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE AON OCIP LIST RE: ENROLLMENT OF SUBCONTRACTORS WHOSE WORK IS IMPLICATED IN THE ASSOCIATION'S DEFECT CLAIMS AND/OR WHO WERE SERVED WITH A CHAPTER 40 NOTICE BY THE ASSOCIATION OR PROVIDED NOTICE BY CLIENTS, IN PREPARATION FOR ESIS PRELIMINARY REPORT (14 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER | | |

| | | | | Hours | |
|-----|------|------|---|-------|--------|
| | | | REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A104 | REVIEW/ANALYZE CLIENT MJ DEAN'S
SUBCONTRACTS FOR TOWER 1 IN ORDER
TO DETERMINE WHETHER MJ DEAN
CONTRACTED WITH ANY OF THE ENROLLED
SUBCONTRACTORS WHOSE WORK IS
IMPLICATED IN THE ASSOCIATION'S DEFECT
CLAIMS AND/OR WHO WERE SERVED WITH
A CHAPTER 40 NOTICE BY THE
ASSOCIATION OR PROVIDED NOTICE BY
CLIENTS, IN PREPARATION FOR ESIS
PRELIMINARY REPORT (320 PAGES) (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.65 | 107.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE CLIENT MJ DEAN'S
SUBCONTRACTS FOR TOWER 2 IN ORDER
TO DETERMINE WHETHER MJ DEAN
CONTRACTED WITH ANY OF THE ENROLLED
SUBCONTRACTORS WHOSE WORK IS
IMPLICATED IN THE ASSOCIATION'S DEFECT
CLAIMS AND/OR WHO WERE SERVED WITH
A CHAPTER 40 NOTICE BY THE
ASSOCIATION OR PROVIDED NOTICE BY
CLIENTS, IN PREPARATION FOR ESIS
PRELIMINARY REPORT (368 PAGES) (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.75 | 123.75 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT
BETWEEN CLIENT MJ DEAN AND BOMBARD
MECHANICAL FOR TOWER II RE: EXPRESS
INDEMNITY PROVISION, INCLUDING
ADDENDUM TO SUBCONTRACT REVISING
THE INDEMNITY PROVISION, IN ORDER TO
ANALYZE POTENTIAL THIRD-PARTY CLAIM
AND IN PREPARATION FOR ESIS
PRELIMINARY REPORT (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN
CLIENT MJ DEAN AND DEAN ROOFING
COMPANY FOR TOWER I RE: EXPRESS
INDEMNITY PROVISION, IN ORDER TO
ANALYZE POTENTIAL THIRD-PARTY CLAIM
AND IN PREPARATION FOR ESIS
PRELIMINARY REPORT (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT | | |

| | | | Hours | |
|-----|------|--|-------|------|
| | | BETWEEN CLIENT MJ DEAN AND FLIPPIN'S TRENCHING FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND FLIPPIN'S TRENCHING FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND FORD CONTRACTING FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND F. RODGERS FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND INSULPRO FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A104 REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND INSULPRO FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY | | |

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| DMC | L120 | A104 | REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND SIERRA GLASS & MIRROR FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A104 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND SIERRA GLASS & MIRROR FOR TOWER II RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A103 | REVIEW/ANALYZE SUBCONTRACT BETWEEN CLIENT MJ DEAN AND SOUTHERN NEVADA PAVING FOR TOWER I RE: EXPRESS INDEMINTY PROVISION, IN ORDER TO ANALYZE POTENTIAL THIRD-PARTY CLAIM AND IN PREPARATION FOR ESIS PRELIMINARY REPORT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE (BEGIN) ESIS PRELIMINARY REPORT RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 16.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (BEGIN) [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.70 115.50 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (CONTINUE) [REDACTED] | |

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| | DMC | L120 | A103 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | 0.10 16.50 |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | 0.10 16.50 |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | 0.20 33.00 |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (CONTINUE) | 0.20 33.00 |
| | | | | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: [REDACTED] | 0.30 49.50 |
| 12/27/2016 | DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 16.50 |
| | | | | REVIEW/ANALYZE BWBO BILLING FILE RE: ATTORNEY'S FEES AND LEGAL COSTS INCURRED TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 33.00 |
| | | | | REVIEW/ANALYZE MEDIATOR BILLING FILE RE: MEDIATOR FEES AND COSTS INCURRED | 0.05 8.25 |

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| | | | TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L240 | A104 REVIEW/ANALYZE EXPERT BILLING FILE RE: EXPERT FEES AND COSTS INCURRED TO DATE, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L240 | A102 RESEARCH RE: CASES CITED IN THE ASSOCIATION'S MOTION TO DISMISS TO DETERMINE WHETHER THEY ARE PROPERLY CITED AS APPLICABLE LAW AND STAND FOR THE LEGAL AUTHORITY/HOLDINGS CITED IN PLAINTIFF'S MOTION AND SHEPARDIZE SAME TO DETERMINE WHETHER THEY ARE STILL GOOD LAW (9 CASES) | 1.10 | 181.50 |
| | DMC | L240 | A103 DRAFT/REVISE (BEGIN) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: OPENING (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) AFFIDAVIT OF ATTORNEY IN SUPPORT OF OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| 12/29/2016 | DMC | L240 | A104 REVIEW/ANALYZE THE ASSOCIATION'S COMPLAINT AGAINST CLIENTS IN THE PRIOR SETTLED AND DISMISSED LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L240 | A104 REVIEW/ANALYZE CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE IN THE PRIOR LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY | | |

| | | | Hours | |
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| DMC | L240 | A104 | RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S CHAPTER 40 NOTICE TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' RESPONSE TO THE ASSOCIATION'S CHAPTER 40 NOTICE TO CLIENTS, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE RECENT AMENDMENTS TO CHAPTER 40 UNDER NEVADA ASSEMBLY BILL 125, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 33.00 |
| DMC | L240 | A104 | REVIEW/ANALYZE CERTIFICATES OF OCCUPANCY ISSUED BY THE CLARK COUNTY BUILDING DEPARTMENT FOR TOWER I AND TOWER II, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' CORRESPONDENCE TO THE ASSOCIATION'S COUNSEL DATED MARCH 29, 2016 AND APRIL 29, 2016 DEMANDING DOCUMENTS AND INFORMATION RELATING TO THE ALLEGED DEFECTS REPAIRED BY THE ASSOCIATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF | 0.05 8.25 |
| DMC | L240 | A104 | REVIEW/ANALYZE CLIENTS' SEPTEMBER 26, 2016 CORRESPONDENCE TO THE | |

| | | | Hours | |
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| | | ASSOCIATION, TENDERING CLIENTS' DEFENSE AND INDEMNITY PURSUANT TO THE SETTLEMENT AGREEMENT IN THE PRIOR LITIGATION, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A104 REVIEW/ANALYZE THE ASSOCIATION'S RESPONSE TO CLIENTS' TENDER OF DEFENSE AND INDEMNITY, IN PREPARATION FOR DRAFTING CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: AFFIDAVIT OF RACHEL BOUNDS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) AFFIDAVIT OF ATTORNEY IN SUPPORT OF OPPOSITION, INCLUDING ADDITION OF EXHIBITS IN SUPPORT OF OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 | 57.75 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) FACTUAL BACKGROUND - THE PROJECT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S | | |

| | | | Hours | |
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| DMC | L240 | A103 | MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - PRIOR LITIGATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.10 | 16.50 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - THE ASSOCIATION'S CHAPTER 40 NOTICE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.35 | 57.75 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) FACTUAL BACKGROUND - CLIENT'S TENDER OF DEFENSE AND INDEMNITY TO THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.05 | 8.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: PROCEDURAL AND DISCOVERY STATUS (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.05 | 8.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) APPLICABLE LEGAL AUTHORITY - MOTION TO DISMISS; NRCP 12(b)(5) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.35 | 57.75 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) APPLICABLE LEGAL AUTHORITY - MOTION FOR SUMMARY JUDGMENT; NRCP 56(C) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | |
| | | | 0.40 | 66.00 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT | |

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| | | | FOR DECLARATORY RELIEF RE:
(CONTINUE) APPLICABLE LEGAL AUTHORITY
- STATUTES OF REPOSE, INCLUDING
AMENDMENTS TO STATUTES PURSUANT TO
AB 125 (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.25 | 41.25 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: CONTINUE)
APPLICABLE LEGAL AUTHORITY - DATE OF
SUBSTANTIAL COMPLETION (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.15 | 24.75 |
| RAB | L320 | A108 | COMMUNICATE (OTHER EXTERNAL) WITH
THE CLARK COUNTY BUILDING
DEPARTMENT, RE: INFORMATION RELATING
TO CERTIFICATE OF OCCUPANCY AND
FINAL INSPECTION DOCUMENTS. | 0.20 | 19.00 |
| RAB | L320 | A104 | REVIEW/ANALYZE EMAIL FROM THE CLARK
COUNTY BUILDING DEPARTMENT, RE:
FOLLOW-UP TO TELEPHONE
CONVERSATION RELATING TO CERTIFICATE
OF OCCUPANCY IN PREPARATION FOR
RESPONSE EMAIL. | 0.10 | 9.50 |
| RAB | L320 | A103 | DRAFT/REVISE RESPONSE EMAIL TO THE
CLARK COUNTY BUILDING DEPARTMENT,
RE: INFORMATION RELATING TO
CERTIFICATE OF OCCUPANCY. | 0.10 | 9.50 |
| RAB | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY BUILDING
DEPARTMENT DOCUMENTS, RE:
CERTIFICATE OF OCCUPANCY FOR 4525
DEAN MARTIN DRIVE AND FINAL
INSPECTION DOCUMENTS IN PREPARATION
FOR ASSISTING ATTORNEY WITH MOTION
TO DISMISS EXHIBITS. | 0.30 | 28.50 |
| RAB | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY BUILDING
DEPARTMENT DOCUMENTS, RE:
CERTIFICATE OF OCCUPANCY FOR 4575
DEAN MARTIN DRIVE AND FINAL
INSPECTION DOCUMENTS IN PREPARATION
FOR ASSISTING ATTORNEY WITH MOTION
TO DISMISS EXHIBITS. | 0.20 | 19.00 |
| 12/30/2016 | DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: | | |

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| | | (CONTINUE) AFFIDAVIT OF RACHEL BOUNDS TO INCLUDE ADDITIONAL PERSONAL KNOWLEDGE AND DOCUMENTARY EVIDENCE IN SUPPORT OF OPPOSITION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (BEGIN) LEGAL ARGUMENT - INTRODUCTION TO LEGAL ARGUMENT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 | 24.75 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - UNIFORM DECLARATORY JUDGMENT ACT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.90 | 148.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S REQUEST FOR DECLARATORY RELIEF IS PROPER: (1) A JUSTICIABLE CONTROVERSY EXISTS BETWEEN CLIENTS AND THE ASSOCIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.70 | 115.50 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S REQUEST FOR DECLARATORY RELIEF IS PROPER: (2) THE INTERESTS OF CLIENTS AND THE ASSOCIATION ARE ADVERSE (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.40 | 66.00 |
| DMC | L240 | A103 DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S | | |

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| DMC | L240 | A103 | REQUEST FOR DECLARATORY RELIEF IS PROPER: (3) CLIENTS' HAVE A LEGALLY PROTECTIBLE INTEREST IN THE LEGAL CONTROVERSY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 |
| | | | 24.75 | |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - BUILDER'S REQUEST FOR DECLARATORY RELIEF IS PROPER: (4) THE ISSUES INVOLVED IN THE CONTROVERSY ARE RIPE FOR JUDICIAL DETERMINATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 |
| | | | 24.75 | |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: INTRODUCTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 |
| | | | 33.00 | |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (1) THIRD CLAIM FOR RELIEF: FAILURE TO COMPLY WITH CHAPTER 40 (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.35 |
| | | | 57.75 | |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (2) FOURTH CLAIM FOR RELIEF: SUPPRESSION OF EVIDENCE/SPOILIATION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.15 |
| | | | 24.75 | |

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| | | | (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (3) FIFTH CLAIM FOR RELIEF: BREACH OF CONTRACT (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.30 | 49.50 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: (CONTINUE) LEGAL ARGUMENT - CLIENTS' AFFIRMATIVE CLAIMS FOR RELIEF ARE PROPER: (4) SIXTH AND SEVENTH CLAIMS FOR DECLARATORY RELIEF: DUTY TO DEFEND AND DUTY TO INDEMNIFY | 0.20 | 33.00 |
| DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS' OPPOSITION TO THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF RE: CONCLUSION AND REQUEST FOR RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.50 | 82.50 |
| 01/03/2017 | PCB | L240 | A103 DRAFT/REVISE (FINALIZE) OPPOSITION TO THE HOA'S MOTION TO DISMISS THE COMPLAINT RE: ADDITIONAL DISCUSSION OF THE PLEADING STANDARDS, THE PROBLEMS WITH THE HOA'S ATTEMPTS TO OBTAIN SUMMARY JUDGMENT ON SOME OF THE ISSUES, THE NEED FOR DECLARATORY RELIEF ON VARIOUS ISSUES, AND THE EFFICACY OF THE COURT BEING ABLE TO DEAL WITH THE ALLEGED ISSUES IN THE COMPLAINT FROM A DECLARATORY RELIEF BASIS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.554 - TOWER II). | 0.40 | 74.00 |
| DMC | L120 | A104 | REVIEW/ANALYZE CLIENTS' CURRENTLY OBTAINED PRIMARY AND EXCESS INSURANCE POLICIES IN PREPARATION FOR ESIS PRELIMINARY REPORT [REDACTED] | | |
| | | | [REDACTED] (606 PAGES) (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.55 | 90.75 |
| DMC | L120 | A103 | DRAFT/REVISE (CONTINUE) ESIS PRELIMINARY REPORT RE: (BEGIN) [REDACTED] | | |
| | | | [REDACTED] (TIME SPLIT WITH OTHER | | |

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| | DMC | L120 | A103 | CLAIM NO./FILE PER CARRIER REQUEST)
DRAFT/REVISE (CONTINUE) ESIS
[REDACTED] (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.10 16.50 |
| | DMC | L250 | A104 | REVIEW/ANALYZE THE ASSOCIATION'S
MOTION TO ASSOCIATE SCOTT WILLIAMS
(CALIFORNIA COUNSEL), IN ORDER TO
DETERMINE IF ANY OPPOSITION IS
NECESSARY (19 PAGES) (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.20 33.00 |
| | | | | | 0.10 16.50 |
| 01/04/2017 | DMC | L240 | A104 | REVIEW/ANALYZE FIRM BILLING RE:
ATTORNEYS FEES INCURRED RELATING TO
PREPARATION OF CLIENTS' OPPOSITION TO
THE ASSOCIATION'S MOTION TO DISMISS
CLIENTS' COMPLAINT FOR DECLARATORY
RELIEF IN ORDER TO INCLUDE THESE
ADDITIONAL FEES IN THE OPPOSITION (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.05 8.25 |
| | DMC | L240 | A103 | DRAFT/REVISE (CONTINUE) CLIENTS'
OPPOSITION TO THE ASSOCIATION'S
MOTION TO DISMISS CLIENTS' COMPLAINT
FOR DECLARATORY RELIEF RE: UPDATE
AFFIDAVIT OF ATTORNEY PETER BROWN
AND LEGAL ARGUMENT TO INCLUDE
ADDITIONAL ATTORNEYS FEES AND COSTS
INCURRED FOR PREPARING CLIENTS'
OPPOSITION (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 16.50 |
| | DMC | L240 | A104 | REVIEW/ANALYZE AR NOTICE OF
SUBMISSION OF EXHIBIT FOR IN CAMERA
REVIEW RE: CONFIDENTIAL SETTLEMENT
AGREEMENT IN THE PRIOR LITIGATION), IN
SUPPORT OF TO CLIENTS' OPPOSITION TO
THE ASSOCIATION'S MOTION TO DISMISS
CLIENTS' COMPLAINT FOR DECLARATORY
RELIEF (PREPARED BY ASSISTANT CRYSTAL
WILLIAMS) FOR COMPLETENESS AND
ACCURACY AND EDIT AND SUPPLEMENT
SAME IN PREPARATION FOR FILING (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 16.50 |
| | DMC | L240 | A104 | REVIEW/ANALYZE SEPARATE APPENDIX | |

| | | | Hours | |
|-----|------|---|-------|-------|
| | | FOR EXHIBITS/EVIDENCE SUBMITTED IN
SUPPORT OF CLIENTS' OPPOSITION TO THE
ASSOCIATION'S MOTION TO DISMISS
CLIENTS' COMPLAINT FOR DECLARATORY
RELIEF (PREPARED BY ASSISTANT CRYSTAL
WILLIAMS) FOR COMPLETENESS AND
ACCURACY AND APPROVE AND EXECUTE
SAME IN PREPARTION FOR FILING (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.30 | 49.50 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER
CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 16.50 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.25 | 41.25 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.40 | 66.00 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] (TIME
SPLIT WITH OTHER CLAIM NO./FILE PER
CARRIER REQUEST) | 0.05 | 8.25 |
| DMC | L120 | A103 DRAFT/REVISE (CONTINUE) ESIS
PRELIMINARY REPORT RE: [REDACTED]
[REDACTED] | 0.40 | 66.00 |
| DMC | L120 | A103 DRAFT/REVISE [REDACTED]
[REDACTED] (TIME SPLIT
WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.35 | 57.75 |

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| | | | | Hours | | |
|------------|-----|------|------|--|------|-------|
| | DMC | L120 | A104 | REVIEW/ANALYZE AR E-MAIL WITH ENCLOSURE FROM BRUCE EDWARDS (MEDIATOR) RE: RECENT CHAPTER 40 MEDIATION, IN ORDER TO DETERMINE WHAT RESPONSE OR ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/05/2017 | DMC | L120 | A103 | DRAFT/REVISE E-MAIL TO FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: CLIENTS' FORTHCOMING RESPONSE TO THE ASSOCIATION'S MOTION TO ASSOCIATE COUNSEL AND REQUEST FOR THE ASSOCIATION TO AGREE TO DESIGNATE THE CASE COMPLEX AND APPOINT FLOYD HALE AS SPECIAL MASTER IN LIEU OF CLIENTS' HAVING TO FILE A MOTION (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L250 | A103 | DRAFT/REVISE CLIENT'S RESPONSE TO THE ASSOCIATION'S MOTION TO ASSOCIATE COUNSEL (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.20 | 33.00 |
| | DMC | L120 | A104 | REVIEW/ANALYZE RESPONSE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: AGREEMENT TO DESIGNATE THE CASE COMPLEX AND APPOINT FLOYD HALE AS SPECIAL MASTER IN LIEU OF CLIENTS' HAVING TO FILE A MOTION, IN ORDER TO DETERMINE IF ANY RESPONSE IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L250 | A103 | DRAFT/REVISE STIPULATION TO DEEM THE CASE AS COMPLEX LITIGATION AND TO APPOINT FLOYD HALE AS SPECIAL MASTER AND PROPOSED COURT ORDER | 0.20 | 33.00 |
| 01/06/2017 | DMC | L160 | A104 | REVIEW/ANALYZE E-MAIL FROM SCOTT WILLIAMS (CO-CO-COUNSEL FOR THE ASSOCIATION - PENDING MOTION TO ASSOCIATE) TO BRUCE EDWARDS (MEDIATOR) RE: REQUESTING MEDIATOR KEEP THIS MATTER OPEN, IN ORDER TO DETERMINE IF ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |

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| | | | | Hours | | |
|------------|-----|------|------|---|------|-------|
| 01/09/2017 | DMC | L120 | A104 | REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: THE ASSOCIATION'S STIPULATION TO DEEM THE CASE COMPLEX AND TO DESIGNATE FLOYD HALE AS SPECIAL MASTER, IN ORDER TO DETERMINE WHAT RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | DMC | L120 | A104 | REVIEW/ANALYZE E-MAIL WITH MULTIPLE ENCLOSURES FROM TRACY JIN OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/10/2017 | DMC | L250 | A104 | REVIEW/ANALYZE ORDER FROM THE COURT RE: APPROVING THE CLIENT'S THE ASSOCIATION'S STIPULATION TO DEEM THE CASE COMPLEX AND TO DESIGNATE FLOYD HALE AS SPECIAL MASTER, 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 | L250 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER RE: COURT ORDER DEEMING THE CASE COMPLEX AND APPOINTING SPECIAL MASTER (PREPARED BY ASSISTANT CRYSTAL WILLIAMS) 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 | 8.25 |
| 01/11/2017 | RAB | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY RECORDS DOCUMENTS, RE: ALL RECORDED DOCUMENTS IN THE CASE RELATING TO THE SAID PROJECT AT 4525 DEAN MARTIN IN PREPARATION FOR ASSISTING ATTORNEY WIT ANALYSIS OF THE CASE. | 0.30 | 28.50 |
| | RAB | L320 | A104 | REVIEW/ANALYZE CLARK COUNTY RECORDS DOCUMENTS, RE: ALL RECORDED | | |

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|--|-----|------|--|-------|--------|
| DOCUMENTS IN THE CASE RELATING TO THE SAID PROJECT AT 4575 DEAN MARTIN IN PREPARATION FOR ASSISTING ATTORNEY WIT ANALYSIS OF THE CASE. | | | | 0.30 | 28.50 |
| 01/12/2017 | DMC | L120 | A104 REVIEW/ANALYZE E-MAIL FROM EDEN WATERS OF MKA (CLIENTS' ARCHITECTURAL EXPERT) RE: [REDACTED] (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 01/13/2017 | RAB | L340 | A104 REVIEW/ANALYZE EMAIL FROM OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | 0.10 | 9.50 |
| | RAB | L340 | A103 DRAFT/REVISE RESPONSE EMAIL TO OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | 0.10 | 9.50 |
| | RAB | L340 | A104 REVIEW/ANALYZE RESPONSE EMAIL FROM OUR CLIENT'S EXPERT MADSEN KNEPPERS AND ASSOCIATES, RE: [REDACTED] | 0.10 | 9.50 |
| | DMC | L250 | A104 REVIEW/ANALYZE COURT MINUTE ORDER GRANTING THE ASSOCIATION'S MOTION TO ASSOCIATE COUNSEL AND REQUEST FOR COUNSEL TO SUBMIT FORMAL ORDER, 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 |
| 01/23/2017 | PCB | L240 | A104 REVIEW/ANALYZE (BEGIN) ALL PLEADINGS, EXHIBITS AND CASE LAW CITED BY BOTH SIDES WITH REGARD TO THE HOA'S MOTION TO DISMISS THE CLIENTS' DECLARATORY RELIEF ACTION IN PREPARATION FOR TOMORROW'S HEARING (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - PANORAMA TOWER II). | 0.70 | 129.50 |
| 01/24/2017 | PCB | L240 | A101 PLAN AND PREPARE (CONTINUE) FOR | | |

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| | | | | Hours | |
|------------|-----|------|---|-------|--------|
| | | | HEARING ON THE HOA'S MOTION TO DISMISS RE: CONTINUE TO OUTLINE ORAL ARGUMENTS AND PRACTICE OF ORAL ARGUMENTS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 0.60 | 111.00 |
| | PCB | L240 | A109 APPEAR FOR/ATTEND HEARING ON THE HOA'S MOTION TO DISMISS (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II). | 1.20 | 222.00 |
| 01/30/2017 | DMC | L250 | A103 DRAFT/REVISE E-MAIL TO FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: DEMAND FOR ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 02/01/2017 | DMC | L240 | A104 REVIEW/ANALYZE E-MAIL FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: HIS FORTHCOMING EXECUTED ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' DECLARATORY RELIEF COMPLAINT, IN ORDER TO DETERMINE IF ANY RESPONSE OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 02/06/2017 | PCB | L120 | A104 REVIEW/ANALYZE PLEADINGS FROM OTHER CASE (SKY LAS VEGAS) TO SEE HOW THE AB125 ISSUE IS BEING HANDLED, [REDACTED]
[REDACTED] (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.588 - PANORAMA TOWER II). | 0.30 | 55.50 |
| 02/07/2017 | DMC | L120 | A104 REVIEW/ANALYZE COMMUNICATION FROM BRUCE EDWARDS (MEDIATOR) RE: CASE STATUS, 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 |
| 02/08/2017 | DMC | L240 | A104 REVIEW/ANALYZE COMMUNICATION FROM FRANCIS LYNCH (COUNSEL FOR THE ASSOCIATION) RE: ORDER ON THE | | |

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| | | | | | Hours | |
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| | | | | ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF, 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 |
| 02/09/2017 | DMC | L240 | A104 | REVIEW/ANALYZE NOTICE OF ENTRY OF ORDER DENYING THE ASSOCIATION'S MOTION TO DISMISS CLIENTS' COMPLAINT FOR DECLARATORY RELIEF (PREPARED BY LEGAL ASSISTANT) FOR COMPLETENESS AND ACCURACY AND APPROVE AND EXECUTE SAME IN PREPARTION FOR FILING WITH THE COURT AND SERVICE ON ALL PARTIES (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| 02/21/2017 | DMC | L230 | A104 | REVIEW/ANALYZE COMMUNICATION FROM SPECIAL MASTER HALE RE: NOTICE OF SPECIAL MASTER HEARING IN ORDER TO DETERMINE IF ANY OBJECTION OR OTHER ACTION IS NECESSARY (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 8.25 |
| | | | | | <u>0.05</u> | <u>8.25</u> |
| For Current Services Rendered | | | | | 23.85 | 3,875.25 |

Recapitulation

| <u>Timekeeper</u> | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|--------------------|--------------|--------------|-------------|--------------|
| Peter C. Brown | PARTNER | 3.30 | \$185.00 | \$610.50 |
| Darlene M. Cartier | ASSOCIATE | 18.75 | 165.00 | 3,093.75 |
| Rachel A. Bounds | PARALEGAL | 1.80 | 95.00 | 171.00 |

Expenses

| | | | | |
|------------|------|------|---|-------|
| 12/01/2016 | L100 | E112 | SERVICE OF PROCESS (9999) AMERICAN LEGAL INVESTIGATION SERVICES NV (INVOICE #37007284 SUMMONS & COMPLAINT - PANORAMA TOWERS CONDOMINIUM UNIT / SERVICES PROVIDED ON 09/29/16 - SPLIT WITH 1287.558) | 23.87 |
| 12/20/2016 | L100 | E112 | WIZ-NET (STIPULATION AND ORDER TO CONTINUE HEARING ON DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION TO DISMISS COMPLAINT) | 1.75 |
| 12/20/2016 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON | |

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PANORAMA TOWER I

| | | | | |
|------------|------|------|---|----------|
| | | | DEFENDANT PANORAMA TOWERS
CONDOMINIUM UNIT OWNERS' ASSOCIATION'S
MOTION TO DISMISS COMPLAINT) | 1.75 |
| 12/31/2016 | L100 | E101 | REPRODUCTION COSTS FOR DECEMBER 2016
(319 PAGES AT .08/PAGE) | 25.52 |
| 01/01/2017 | L100 | E112 | COURT FEES (8009) LEXISNEXIS ONLINE INVOICE
#1612363686 / SERVICES PROVIDED ON 12-01-16
TO 12-31-16) | 5.43 |
| 01/04/2017 | L100 | E112 | WIZ-NET (APPENDIX TO PLAINTIFFS' OPPOSITION
TO DEFENDANT PANORAMA TOWERS UNIT
OWNERS ASSOCIATION'S MOTION TO DISMISS
COMPLAINT) | 3.50 |
| 01/04/2017 | L100 | E112 | WIZ-NET (NOTICE OF SUBMISSION OF EXHIBIT
FOR IN CAMERA REVIEW) | 3.50 |
| 01/04/2017 | L100 | E112 | WIZ-NET (PLAINTIFFS' OPPOSITION TO
DEFENDANT PANORAMA TOWERS UNIT OWNERS
ASSOCIATION'S MOTION TO DISMISS
COMPLAINT) | 3.50 |
| 01/05/2017 | L100 | E112 | WIZ-NET (PLAINTIFF LAURENT HALLIER'S,
PANORAMA TOWER I, LLC'S, PANORAMA
TOWERS MEZZ, LLC'S AND M.J. DEAN
CONSTRUCTION, INC.'S NON-OPPOSITION TO
DEFENDANT PANORAMA TOWERS
CONDOMINIUM UNIT OWNERS' ASSOCIATION'S
MOTION TO ASSOCIATE COUNSEL) | 3.50 |
| 01/10/2017 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF STIPULATION
AND ORDER TO DEEM THE CASE COMPLEX AND
TO APPOINT FLOYD HALE AS SPECIAL MASTER) | 1.75 |
| 01/10/2017 | L100 | E112 | WIZ-NET (STIPULATION AND ORDER TO DEEM
THE CASE COMPLEX AND TO APPOINT FLOYD
HALE AS SPECIAL MASTER) | 1.75 |
| 01/24/2017 | L100 | E109 | PARKING (PETER BROWN) | 7.00 |
| 01/31/2017 | L100 | E101 | REPRODUCTION COSTS FOR JANUARY 2017
(1999 PAGES AT .08/PAGE) | 159.92 |
| 02/09/2017 | L100 | E112 | WIZ-NET (NOTICE OF ENTRY OF ORDER DENYING
DEFENDANT PANORAMA TOWERS
CONDOMINIUM UNIT OWNERS' ASSOCIATION'S
MOTION TO DISMISS COMPLAINT) | 1.75 |
| 02/09/2017 | L100 | E112 | WIZ-NET (ORDER DENYING DEFENDANT
PANORAMA TOWERS CONDOMINIUM UNIT
OWNERS' ASSOCIATION'S MOTION TO DISMISS
COMPLAINT) | 1.75 |
| 02/28/2017 | L100 | E101 | REPRODUCTION COSTS FOR FEBRUARY 2017
(102 PAGES AT .08/PAGE) | 8.16 |
| | | | Total Expenses | 254.40 |
| | | | Total Current Work | 4,129.65 |

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Previous Balance \$21,690.55

Balance Due \$25,820.20

| Past Due Amounts | | | | | |
|------------------|-------|----------|--------|---------|-----------|
| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
| 4,129.65 | 0.00 | 7,187.29 | 0.00 | 0.00 | 14,503.26 |

Task Code Recapitulation

| | | <u>Fees</u> | <u>Expenses</u> |
|------|---|-------------|-----------------|
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 0.00 | 254.40 |
| L120 | ANALYSIS/STRATEGY | 1293.00 | 0.00 |
| L160 | SETTLEMENT/NON-BINDING ADR | 49.50 | 0.00 |
| L190 | OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION | 18.50 | 0.00 |
| L100 | CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION | 1,361.00 | 254.40 |
| L230 | COURT MANDATED CONFERENCES | 8.25 | 0.00 |
| L240 | DISPOSITIVE MOTIONS | 2219.50 | 0.00 |
| L250 | OTHER WRITTEN MOTIONS AND SUBMISSIONS | 115.50 | 0.00 |
| L200 | PRE-TRIAL PLEADINGS AND MOTIONS | 2,343.25 | 0.00 |
| L320 | DOCUMENT PRODUCTION | 142.50 | 0.00 |
| L340 | EXPERT DISCOVERY | 28.50 | 0.00 |
| L300 | DISCOVERY | 171.00 | 0.00 |

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

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

TAX ID # 33-0747275

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

Attn: Sherilyn Brydon

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PANORAMA TOWER II

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

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

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 PANORAMA TOWER II

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

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 PANORAMA TOWER II

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

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

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

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| JBV | L110 | A104 | (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 |
| | | A103 | REVIEW/ANALYZE EMAIL | 6.00 |
| | | | CORRESPONDENCE FROM LITIGATION SERVICES, RE: OBTAINING ACCESS TO VIEW DOCUMENTS DISCLOSED IN PREVIOUS LITIGATION FOR PANORAMA TOWERS, IN PREPARATION FOR DETERMINING SPECIFIC SUBCONTRACTORS WHO PERFORMED WORK AT PROJECT RELEVANT TO THE DEFECT ALLEGATIONS LISTED IN PLAINTIFF'S NRS CHAPTER 40 | |
| | | | CORRESPONDENCE SERVED ON CLIENTS. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 |
| JBV | L110 | A103 | DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION SERVICES, RE: REQUEST FOR UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES DURING PRIOR CONSTRUCTION DEFECT LITIGATION. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 |
| | | A104 | REVIEW/ANALYZE ADDITIONAL EMAIL CORRESPONDENCE FROM LITIGATION SERVICES, RE: UPDATED LIST OF ALL DOCUMENTATION DISCLOSED FOR PRIOR CONSTRUCTION DEFECT LITIGATION, IN PREPARATION FOR DETERMINING IF MJ DEAN CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION FOR EASE OF REFERENCE TO SUBCONTRACTOR SCOPES OF WORK. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 |
| | | | REVIEW/ANALYZE UPDATED LIST OF ALL DOCUMENTATION DISCLOSED BY ALL PARTIES FROM PRIOR CONSTRUCTION DEFECT LITIGATION, RE: DETERMINING IF MJ DEAN CONSTRUCTION'S DOCUMENTATION WERE BROKEN DOWN AS DISCLOSED BY PLAINTIFF IN SAID LITIGATION, IN PREPARATION FOR FOR EASE OF REFERENCE TO SUBCONTRACTOR SCOPES OF WORK AND SERVING SAID SUBCONTRACTORS WITH CHAPTER 40 CORRESPONDENCE PURSUANT TO NRS 40.646. (TIME SPLIT WITH OTHER CLAIM | 6.00 |
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| | | DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S THIRD PRODUCTION OF DOCUMENTS (P0001545-P0001612), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FOURTH PRODUCTION OF DOCUMENTS (P0001613-P0002486), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW MANUFACTURER WAS, IN PREPARATION FOR SERVING EACH PARTY WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTH PRODUCTION OF DOCUMENTS (P0002487-P0002498), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE INSULATION SUBCONTRACTOR OR THE WINDOW | | |

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

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

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

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

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

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

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

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

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| | | <p>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)</p> | 0.05 | 6.00 |
| JBV | L110 | <p>A104 COMMUNICATE WITH CLIENT'S POTENTIAL EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:</p> <p>[REDACTED]</p> <p>(TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST)</p> | 0.10 | 12.00 |
| JBV | L110 | <p>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)</p> | 0.05 | 6.00 |
| JBV | L110 | <p>A104 REVIEW/ANALYZE DOCUMENTS DISCLOSED WITHIN PLAINTIFF'S FIFTY-SIXTH PRODUCTION OF DOCUMENTS (P0068453-69101), RE: DETERMINING IF ANY INFORMATION WITHIN REFLECTS WHO THE</p> | | |

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

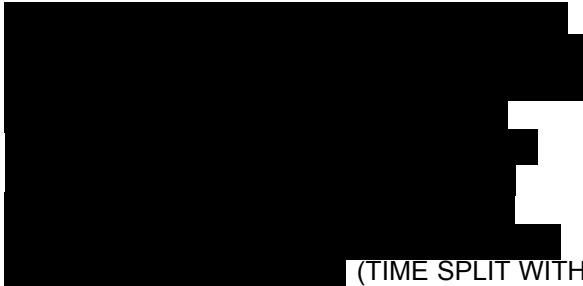
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| | | WITH NEVADA REVISED STATUTE CHAPTER 40 CORRESPONDENCE REFLECTING NEW DEFECT ALLEGATIONS PRESENTED BY PLAINTIFF'S COUNSEL, AS REQUESTED BY SUPERVISING ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.10 | 12.00 |
| JBV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

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

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| | | (TIME SPLIT WITH
OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.10 | 12.00 |
| JBV | L110 | A104 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
AND MANUFACTURERS PURSUANT TO NRS
40.646. (TIME SPLIT WITH OTHER CLAIM
NO./FILE PER CARRIER REQUEST) | 0.15 | 18.00 |
| JBV | L110 | A104 REVIEW/ANALYZE CORPORATE
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
WITH OTHER CLAIM NO./FILE PER CARRIER
REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A103 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
CARRIER REQUEST) | 0.05 | 6.00 |
| JBV | L110 | A104 REVIEW/ANALYZE CORPORATE
INFORMATION FOR BOMBARD MECHANICAL,
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 BOMBARD | | |

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

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

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

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

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

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| | | | LLC, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| | JBV | L110 | A103 DRAFT/REVISE SUPPLEMENTAL NRS CHAPTER 40 CORRESPONDENCE TO BOMBARD MECHANICAL, RE: PROVIDING NRS CHAPTER 40 CORRESPONDENCE FROM PLAINTIFF'S COUNSEL TO CLIENTS, PANORAMA TOWERS I, LLC AND PANORAMA TOWERS II, LLC, AS REQUESTED BY ATTORNEY. (TIME SPLIT WITH OTHER CLAIM NO./FILE PER CARRIER REQUEST) | 0.05 | 6.00 |
| 04/01/2016 | DMC | L120 | A108 COMMUNICATE (OTHER EXTERNAL) (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 |
| | 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 |
| 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 TOWERS I AND II AS WELL AS MJ DEAN | | |

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

Panorama Tower II
 5143220827859X
 PANORAMA TOWER II

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