Case No. 80615

IN THE SUPREME COURT OF NEVADA

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

Appellant,

VS.

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

Respondents.

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APPEAL

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

APPELLANT'S APPENDIX VOL 20 OF 27

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SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII 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 and, if the notice includes an expert opinion concerning the alleged constructional defect, the expert, or a representative of the expert who has knowledge of the alleged constructional defect, must also be present at the inspection and identify the exact location of each alleged constructional defect for which the expert provided an opinion; and
- (c) Allow the contractor, subcontractor, supplier or design professional a reasonable opportunity to repair the constructional defect or cause the defect to be repaired if an election to repair is made pursuant to NRS 40.6472.
- 7. As noted above, the Contractors move for summary judgment, arguing the amended NRS 40.645 notice still is deficient, meaning the constructional defects even now are not identified with specificity. This Court addresses the Contractors' challenge to the validity of the amended NRS 40.645 notice with respect to each of the remaining three identified constructional defects below.
- a. Residential tower windows: As noted above, within the amended NRS 40.645 notice, the Association claims there is a constructional defective design of 100 percent of the window assemblies in the 616 residential tower units as water entering these mechanisms has no appropriate means of draining or exiting these fabrications. Specifically, the Association states the window assemblies were built in accordance with the project plans; however, the plans failed to specify pan and head flashings at the rough openings for the windows. "Because these flashings were not called for in the plans and specifications, they were not installed." The location of each of the windows installed in accordance with this defective design is marked on the exterior plan

¹³See Exhibit D attached to the Association's Opposition to the Contractors' Motion for Summary Judgment filed September 4, 2018, p. 3.

elevations for the two towers.¹⁴ As a consequence, "water that should have drained to the exterior of the building has been entering the metal framing components of the exterior wall and floor assemblies, including the curb walls that support the windows, and is causing corrosion damage to the metal parts and components within these assemblies as described and identified in Exhibit A."¹⁵ "The resulting damage to the metal components of the tower structures presents an unreasonable risk of injury to a person or property resulting from the degradation of these structural assemblies."

The Contractors maintain the amended notice is not sufficient as the Association did not physically inspect all 9,500 tower windows for the omission of the head and/or sill pan flashing, and is attempting to rely upon extrapolation of a few photographs as proof the alleged defective condition exists. Further, the Contractors complain the omission of the head flashing is a new issue, or that not previously raised in the original NRS 40.645 notice. This Court disagrees with Contractors' position regarding the sufficiency of the amended notice. While NRS 40.645 now requires specific detail of each defect, damage and injury, the Association is not necessarily required to physically inspect each of the 9,500 windows for deficiencies particularly when they all are alleged to be defectively designed. In this case, the Association claims all window assemblies were built according to the plans and specifications. Further, the plans did not call for the installation of pan and head flashings in all 9,500 windows which is causing water to drain into the metal framing components of the exterior wall as opposed to outside of the building. The amended NRS 40.645 notice identifies each defect, damage and injury to the windows. This Court, therefore, concludes the amended notice sufficiently identifies the defects, damage and injury with respect to the 9,500 windows located in the two residential towers.

¹⁴See Exhibit B of Exhibit D attached to the Association's Opposition to the Contractors' Motion for Summary Judgment.

¹⁵See Exhibit D attached to the Association's Opposition to the Contractors' Motion for Summary Judgment, pp. 3-4.

This Court appreciates the identification of the omission of head flashings may be raised for the time in the amended notice, but the issue—meaning the drainage problem—is not new. The omission of the head flashing simply explains why there is drainage into the metal framing components of the exterior wall.

- b. Residential tower fire blocking: The original NRS 40.645 notice indicates there is no fire blocking insulation within the ledger shelf cavities, steel stud framing hollow spaces or both at the exterior wall locations between the residential floors although such installation was required in the building plans. While the Association originally claimed this deficiency existed in 100 percent of the residential tower units, the fact is this defect is not universal and appears to be a workmanship issue. Within the amended notice, the Association admitted it inspected 15 of the 616 units and determined the defect exists in only 76 percent of the small sample. Notwithstanding the deficiency cannot be shown to exist in every unit, the damage and injury to each residence and common areas are not detected. It follows the exact location of each defect, damage and injury is not identified. For these reasons, this Court concludes the portion of the amended NRS 40.645 notice, which addresses the lack of fire blocking insulation, is not sufficient.
- same as that stated in the original. As set forth in the original notice, "[t]he main sewer line connecting the Development to the city sewer system ruptured due to installation error during construction, causing physical damage to the adjacent 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." Neither notice specified the "installation error made" or although the amended does note raw sewage seeped into the common areas and there was damage in the vicinity of the rupture. This Court concludes this portion of the NRS 40.645 notice, addressing the sewer problem, is not sufficient. Further, and

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SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII

notwithstanding that premise, the Contractors were never notified of the sewer issue prior to renovation, and thus, were not accorded the right to inspect and repair.

In summary, following the requirements set forth in the newly-amended NRS 40.645, this Court concludes the Contractors met their burden to demonstrate Association's pre-litigation notice addressing all the fire blocking/insulation and sewer issues remains deficient, and thus, they overcome the presumption of the notice's validity on these points. On the other hand, this Court also finds the amended notice to be valid with respect to the windows' deficiencies.

8. The Association has argued the Motion for Summary Judgment should nevertheless be denied in its entirety as it was not required to provide notice before commencing an action as the Contractors had already filed an action against them. They cite NRS 40.645(4) to support their position. NRS 40.645(4) provides in salient part:

Notice is not required pursuant to this section before commencing an action if: (a) The contractor, subcontractor, supplier or design professional has filed an action against the claimant;

In this Court's view and given the history of this matter, the Association misapplies this statutory provision. Here, the Contractors did not file any lawsuit or action against the Association until after the original NRS 40.645 notice was sent. Further, the lawsuit was filed to challenge the validity of the claimant's notice. The claimant, or in this case, the Association is not excused from producing a sufficient notice after its original is challenged. If anything, such a premise would nullify the holding of D.R. Horton, Inc., 123 Nev. 468, 168 P.3d 731, and produce absurd results by encouraging claimants to provide an invalid and conclusory notice, and then be excused from the requirement to produce a specified notice when the contractor or developer challenges its validity.

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

IT IS HEREBY ORDERED, ADJUDGED AND DECREED Plaintiffs'/Counter-Defendants' Motion for Summary Judgment on Defendant's/Counter-Claimant's April 5, 2018

SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII Amended Notice of Claims filed August 3, 2018 is granted in part, denied in part. It is granted with respect to the insufficiency of the amended notice concerning the fire blocking/insulation and sewer issues. It is denied concerning the validity of the amended notice of windows' deficiencies as relayed above.

DATED this 29th day of November 2018.

SUSAN H. JOHNSON, DISTRICT COUR

CERTIFICATE OF SERVICE

I hereby certify, on the 30th day of November 2018, 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 8u9144 pbrown@bremerwhyte.com

FRANCIS I. LYNCH, ESO. 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 t

uea Banks

Laura Banks, Judicial Executive Assistant

SUSAN H. JOHNSON DISTRICT JUDGE DEPARTMENT XXII

EXHIBIT "H"

ELECTRONICALLY SERVED 4/5/2018 12:31 PM

1 2 3 4	Francis I. Lynch, Esq. (Nevada Bar No. 4145) LYNCH HOPPER, LLP 1210 S. Valley View Blvd., Suite 208 Las Vegas, Nevada 89102 Telephone:(702) 868-1115 Facsimile:(702) 868-1114	
5 6 7 8 9	Scott Williams (California Bar No. 78588) WILLIAMS & GUMBINER LLP 100 Drakes Landing Road, Suite 260 Greenbrae, California 94904 Telephone:(415) 755-1880 Facsimile:(415) 419-5469 (Admitted Pro Hac Vice)	
10	Counsel for Defendant/Counter-claimant	
11		
12		L DISTRICT COURT
13 14	CLARK COUN	NTY, NEVADA
15 16 17 18 19 20 21 22 23 24 25 26	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	CASE NO: A-16-744146-D DEPT. NO: XXII PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S AMENDED NOTICE OF CLAIMS PURSUANT TO NRS § 40.645
27 28	UNIT OWNERS' ASSOCIATION, a Nevada non-profit corporation, and Does 1 through 1000, Counter-claimant,	
	0001	1
	Amended Notice of Clair	ns Pursuant to NRS 40.645 AA3110

Case Number: A-16-744146-D

1	vs.
2	LAURENT HALLIER, an individual;
3	PANORAMA TOWERS I, LLC, a Nevada
4	limited liability company; PANORAMA TOWERS I MEZZ, LLC, a Nevada limited
	liability company; M.J. DEAN
5	CONSTRUCTION, INC., a Nevada Corporation
6	SIERRA GLASS & MIRROR, INC.; F.
	ROGERS CORPORATION,; DEAN ROOFING
7	COMPANY; FORD CONTRACTING, INC.;
8	INSULPRO, INC.; XTREME XCAVATION;
	SOUTHERN NEVADA PAVING, INC.;
9	FLIPPINS TRENCHING, INC.; BOMBARD MECHANICAL, LLC; R. RODGERS
10	CORPORATION; FIVE STAR PLINBING &
11	HEATING, LLC, dba Silver Star Plumbing; and
	ROES 1 through 1000, inclusive,
12	
	Counter-defendants

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PLEASE TAKE NOTICE that Defendant and Counter-claimant Panorama Towers Condominium Unit Owners' Association, a Nevada non-profit corporation (the "Association"), hereby provides amended notice of claims for constructional defects (as the term is defined and used is NRS § 40.600 - 40.695) against Plaintiff and Counter-defendants as captioned and identified above (the "Builders"). Said claims include those arising directly from the defects described herein as well as any and all other rights of claim or causes of action under any other statutory or common law rights which the Association may have against the Builders, and each of them individually, jointly and severally.

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AMENDED CHAPTER 40 NOTICE

This Amended Notice is being given to satisfy the requirements of NRS 40.645. The Association intends to pursue claims against the Counter-defendants identified above pursuant to Nevada Revised Statutes (NRS) 40.600 et seq., arising from defects in the design and construction of the Panorama Towers condominium development located at 4525 Dean Martin Drive, Las Vegas,

28 Nevada (the "Development").

By virtue of this Amended Notice, you, and each of you, must also take notice that you have certain timely obligations to the Association herein above described, as well as to persons, firms or corporations with whom or which you may have contracted to perform the work complained of at the Development, all under the provisions of NRS $\S 40.646 - 40.649$, inclusive.

This Amended Notice incorporates by reference and amends the previous Notice dated February 24, 2016, including the Verification signed under penalty of perjury by a member of the executive board and/or an officer of the Association verifying that each such defect, damage and injury specified in the Notice exists, with respect to the following claims:

1. Residential tower windows

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

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

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

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

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

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

2. Residential tower exterior wall insulation

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

This installation deficiency exists in the majority of the locations where it is required for the 616 residential tower units, in which insulation was omitted either from the ledger shelf cavity, from the steel stud framing cavity, or from both. From November of 2015, through January of 2016, 15 units in the Development were inspected. Units were selected from different towers and with different exposures to obtain a mixed sampling. Of the ledger shelf cavities inspected, 76% had no fire blocking insultation and many of the steel stud framing cavities had questionable and/or a lack of proper fire blocking provisions. *See* Affidavit of Omar Hindiyeh In Support of Panorama's Opposition to Hallier's Motion for Partial Summary Judgment attached hereto as "Exhibit C".

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

3. Sewer problem

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

1	The rupture of the sewer line caused raw sewage to be deposited on the common area of the
2	development in the location of the rupture. In addition to causing damage in the vicinity of the
3	rupture, the defective installation presented an unreasonable risk of injury to a person or property
4	resulting from the disbursement of unsanitary matter.
5	Because the Association had previously settled a suit against the Builders and had not yet
6	discovered the window and insulation claims, it was assumed by the Association that this isolated
7	incident would not be the subject of a Chapter 40 claim. The Association therefore repaired the
8	ruptured sewer line without giving notice to the Builders.
9	
10	DATED: April 5, 2018 LYNCH HOPPER, LLP
11	
12	/s/ Francis Lynch Francis I. Lynch, Esq.
13	Attorneys for Defendant and Counter-Claimant
14	
15	CERTIFICATE OF SERVICE
16	The undersigned hereby certifies that on the 5 th day of April, 2018, a copy of the foregoing,
17	PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S AMENDED
18	NOTICE OF CLAIMS PURSUANT TO NRS § 40.645, was electronically served through Odyssey
19	upon Counsel for Plaintiffs/Counter-defendants and sent by certified mail, return receipt requested,
20	to:
21	
22	BREMER WHYTE BROWN & O'MEARA LLP
23	Peter C. Brown, Esq. Darlene M. Cartier, Esq.
24	1160 N. Town Center Drive Suite 250
25	Las Vegas, NV 89144
26	By:
27	Dy:
21	

EXHIBIT A

EXHIBIT A

EXHIBIT A

Preliminary
Defect Report

Panorama Towers Condominium Unit Owner's Association



Allana Buick & Bers, Inc. 990 Commercial Street Palo Alto, CA 94303 t 650.543.5600 f 650.543.5625 www.abbae.com

ALLANA BUICK & BERS

Making Buildings Perform Better

Prepared for:

Mr. Francis Lynch Lynch Hopper LLP. 1210 South Valley View BLVD Suite 208 Las Vegas NV 89102

ABBAE PN# 18-5172.01

Mediation/Settlement Communications Evidence Codes 1119 and 1152

Preliminary Defect Report

Panorama Towers Condominium Unit Owner's Association #18-5172.01

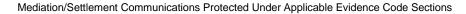




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Executive Summary

Allana Buick and Bers, Inc. **(ABBAE)** was retained by Mr. Francis Lynch of Lynch Hopper LLP. to further investigate the deficiencies associated with the Exterior Insulation and Finish System (EIFS) at the Panorama Towers. The towers consist of two high-rise buildings with a total of 616 residential units and is located at 4525 Dean Martin Drive, Las Vegas Nevada.

ABBAE's investigation focused on reviewing construction documents and testing reports performed by construction consulting groups that were present on site during the investigation. As ABBAE was not previously involved in the investigation process; this report is based on the review of the available reports, photographs by others, architectural, and shop drawings related to the overlooked issues associated with the Exterior Insulation and Finish System (EIFS). ABBAE also performed a limited visual survey of the exterior of the tower buildings in order to determine what Exterior Insulation and Finish System (EIFS) has been utilized on the high-rises.

After an additional review of the ESR reports, construction drawings, shop drawings, and various Exterior Insulation and Finish System (EIFS) details, ABBAE is able to determine that the high-rise towers were installed using the STO Exterior Insulation and Finish System (EIFS).

Building Construction and Governing Codes

Owner: Hallier Properties LLC

Architect: KLAI JUBA Architects

Civil Engineer: LOCHSA Engineering

Structural Engineer: LOCHSA Engineering

Mechanical, Electrical, Plumbing Engineer: JBA Consulting Engineers

Applicable Codes and Occupancy per Architectural Drawings

Code: 2000 IBC with Clark County Amendments

Occupancy Group: R-2
Construction Type: 1-A

Provided by Lynch Hopper LLP., ABBAE reviewed the architectural drawings dated December 11, 2006, EIFS shop drawings consisting of Structural EIFS details dated December 3rd 2004, and shop drawings dated on August 15 and September 15 of 2006. In addition, ABBAE reviewed the reports from Paoli & Co, CMA Consulting, and Allen Group Architects, Inc. and photographs from CMA's repairs and investigations.



Limitations

This investigation is based on limited visual observations, destructive testing documentation performed by other consulting groups, and available construction documents.

Key Words

This Statement of Claims (SOC) is organized by individual observed deficiencies herein referred to as "Defect." Each major category is listed in the Table of Contents. The sub-category of each issue is organized as follows:

- Defect
- Codes and Standards
- Resultant Damage

The following is a brief explanation of each sub-category:

Defect: The defects noted are specific in nature where investigated, and the location of the defects is noted where observed. Defects listed in this report are not an exhaustive list of all defects that may be found on this project; they are not based on complete investigation of all the issues; nor do they represent an exhaustive review of the construction documents. Photographs of each of the defects are included in this report and follow the defect list.

Codes and Standards: The construction defects were interpreted in accordance with the requirements of 2000 International Building Code and ICBO ICC-ES Reports for the Sto Exterior Insulation and Finishing Systems (EIFS). The architectural construction drawings, Sto Exterior Insulation and Finishing Systems (EIFS) and Tower EIFS shop drawings were available for review. Please see Appendix A for more information.

Resultant Damage: Resultant damage already includes water damage, and may include loss of life expectancy, and loss of fire rating and/or diminished resale value of the property. Due to the limited nature of our destructive and non-invasive testing, the resultant damages section includes both damage that were observed during destructive testing as well as projected damages based on ABBAE's experience.



Defect List

1.0 Exterior Insulation and Finish System

- 1.01 Omission of pan flashings at EIFS system rough openings (window assemblies)
- 1.02 Omission of head flashings at EIFS system rough openings (window assemblies)

1.0 Windows and Doors

1.01 Omission of pan flashing at window assemblies

Discussion:

Based on our investigation, ABBAE determined that pan flashings are omitted at the Exterior Insulation and Finish System (EIFS) rough window openings on the two (2) towers. Based on as-built shop drawings and visual review, we were able to confirm that this defect is universal and occurs at all windows of the high-rise buildings. These critical pan flashings are required by the material manufacturers and building code and its omission, is a code violation.

Upon the review of the EIFS shop drawings (dated 09/15/2006), Details 1, Sheet F4.01 (Exhibit 01), the design is defective as it does not depict a pan flashing. In lieu of a pan flashing, a sill flashing is shown. In order to confirm that the windows were built as depicted in the shop drawings, limited destructive testing was performed by CMA Consulting from August 2013 to July 2016, where some windows were disassembled to confirm if the construction followed the design intent. The sill condition shows a sill flashing running from outside and terminating approximately half (1/2") inch in from the exterior of the window system at the window "rock and roll" bracket. The lack of a complete pan flashing can also be visually confirmed by observing the window sill from the inside of the units. Based on review of EIFS shop drawings, visual and destructive testing, we were able to confirm that the windows were in fact incorrectly built to the design intent, per the shop drawings. Photos from CMA's investigation observations are attached herein as Exhibit 05 and Exhibit 06.

Sto drawing detail 1.24a (Exhibit 02) and ICBO reports calls for a use of the window pan flashing. Additionally, the following statement is made in the "Notes:" section of the Sto detail: "2. Protect rough opening against water penetration by wrapping with a barrier membrane Direct any water penetration to the exterior at or above the sill pan flashing."

The omission of the sill pan flashing, in observed construction, resulted in leaks, damage, staining and rust under the window and sill flashing assembly.

Codes and Standards:

2000 International Building Code, Section 1403.2 Weather Protection:

"Exterior walls shall provide the building with a weather resistant exterior wall envelope. The exterior wall envelope shall include flashings, described in Section 1405.3. The exterior wall envelope shall be designed and constructed in such a manner as to prevent the accumulation of water within the wall assembly by providing a water-resistive barrier behind the exterior veneer, as described in section 1404.2 and a means for draining water that enters the assembly to the exterior of the veneer..."

- The installed Sto Exterior Insulation and Finish System (EIFS) does not have the code required weather resistive barrier.



<u>2000 International Building Code (IBC)</u> allows for a "barrier" system without a weather resistive barrier as an exception in section 1403.2 Weather Protection, Exceptions 2.:

"Compliance with the requirements for means of drainage, and the requirements of Section 1405.2 and Section 1405.3, shall not be required for an exterior wall envelope that has demonstrated to resist wind-driven rain through testing of the exterior wall envelope, including joints, penetrations and intersections with dissimilar materials, in accordance with ASTM E331...The exterior wall envelope design shall be considered to resist wind-driven rain where the results of testing indicate that water did not penetrate control joints in the exterior wall envelope, joints at the perimeter of openings penetration, or intersection of terminations with dissimilar materials."

- This exception requires that all systems without weather barriers be tested for air and water infiltration per ASTM E331

ASTM E331, Scope 1.2:

"This test method is applicable to any curtain-wall area or to windows, skylights, or doors alone."

ASTM E331, Scope 1.3:

"This test method addresses water penetration through a manufactured assembly. Water that penetrates the assembly, but does not result in a failure as defined herein..."

ICBO ES Report ER-3906, October 1, 2001, Figure 2, Page 6, "STO EIFS at Window Sill":

Window sill detail shows a continuous pan flashing with back leg going from the back of the window assembly to the exterior past the sill and adhered with sealant to the EIFS assembly.

ICBO ES Report ER-3906, October 1, 2001, Section 4.1 Findings:

"Construction is as set forth in this report and the manufacturer's instructions."

ICBO ES Report ER-3906, October 1, 2001, Section 4.5 Findings:

"Installation is by applicators trained by STO Corporation.

ICC Evaluation Report, AC24 Acceptance Criteria for Exterior Insulation and Finis Systems, Approved June 2003

Section 2.2.1 (EIFS Wall Covering Assembly with Drainage): "An EIFS wall covering assembly with drainage is a nonbearing exterior wall covering assembly applied to a solid substrate. It includes a water-resistive coating that may be trawled-, spray- or rolled-applied over the surface of a sheathing substrate, or a weather-resistive barrier as defined in Sections 1402 and 2506.4 of the UBC or a water-resistive barrier as defined in Sections 1404.2 and 2510.6 of the IBC or weather-resistant sheathing paper as defined in Sections R703.2 of the IRC; a drainage medium, or other means of drainage..."

Section 5.7 (Exterior Wall Construction): "Plans, details, and specifications, concerning proper installation of the EIFS, that are applicable to the specific building under consideration, must be a part of documents submitted to the building official for approval. When installed on framed walls of Type V, Group R, Division 1 or Division 3 Occupancies (UBC), Type V, Group R1, R2, R3, R4 Occupancies (IBC), or building under the IRC, EIFS wall covering assemblies with drainage, defined in Section 2.2 are required."

Section 7.0 (Application): "Application instructions bearing the date of publication must be submitted. Instructions must include the information noted in Section 7.1 through 7.6. Installation details need to be consistent with assemblies tested under Section 6.10.3, as applicable."

Section 7.1.1 (Application): Flashing and/or sealing around heads, sills and jambs of windows and doors, and at the top of exposed walls.

STO EIFS Details, April, 2000:

Detail 1.24a: Detail shows a continuous sill pan flashing with a back leg and end dam underneath the window assembly.



STO EIFS Details, April, 2000, Detail 1.24a, Attention Section (bottom of the page)

"Sto products are intended for use by qualified professional contractors...They should be installed in accordance with those specifications and Sto's instructions..."

Tower 2 EIFS Shops, Detail 3, Sheet F6.02:

Detail shows a sill condition at the window assembly without a window sill pan flashing.

Resultant Damage:

Omission of window sill pan flashings may result in water intrusion into occupied and concealed building spaces; resulting in damage to building components, finishes and personal property.

1.02 Omission of head flashings at window assemblies

Discussion:

ABBAE reviewed the architectural drawings, EIFS shop drawings and investigation photographs taken by other consulting groups during the destructive testing of the window assemblies and was able to determine the windows and EIFS assembly does not have window head flashings. Based on as-built shop drawings and visual review, we were able to confirm that this defect is universal and occurs at all windows of the high-rise buildings. These critical window head flashings are required by the material manufacturers and building code and its omission is a code violation.

Based on the review of the EIFS shop drawings detail 4, sheet F4.01 (Exhibit 03), the design is defective as it does not depict a window head flashing; which is required by the Sto Exterior Insulation and Finish System details and installation guide. In order to confirm that the windows were built as depicted in the shop drawings, limited destructive testing was performed by CMA Consulting from August 2013 to July 2016, where some windows were disassembled to confirm if the construction followed the design intent. The photographs showing the removal of the window assembly, confirm the omission of the window head flashing; therefore, we are able to confirm that the EIFS and window assemblies were in fact incorrectly built to the design intent, per the shop drawings. Photos from CMA's investigation and ABB's observations are attached herein as Exhibit 07 though Exhibit 09.

Sto drawing detail 1.23a (Exhibit 04) and ICBO reports calls for a use of the window head flashing. Additionally, the following statement is made in the Sto detail "Notes:" section: "2. Provide flashing installed over the window to direct water away from the window..."

The omission of the window head flashings prevents water from properly being shed from the exterior surface of the towers, resulting in water intrusion beyond the exterior of the building's surface.

Codes and Standards:

2000 International Building Code, Section 1403.2 Weather Protection:

"Exterior walls shall provide the building with a weather resistant exterior wall envelope. The exterior wall envelope shall include flashings, described in Section 1405.3. The exterior wall envelope shall be designed and constructed in such a manner as to prevent the accumulation of water within the wall assembly by providing a water-resistive barrier behind the exterior veneer, as described in section 1404.2 and a means for draining water that enters the assembly to the exterior of the veneer..."

 The installed Sto Exterior Insulation and Finish System (EIFS) does not have the code required weather resistive barrier.

2000 International Building Code (IBC) allows for a "barrier" system without a weather resistive barrier as an exception in section 1403.2 Weather Protection, Exceptions 2.:



"Compliance with the requirements for means of drainage, and the requirements of Section 1405.2 and Section 1405.3, shall not be required for an exterior wall envelope that has demonstrated to resist wind-driven rain through testing of the exterior wall envelope, including joints, penetrations and intersections with dissimilar materials, in accordance with ASTM E331...The exterior wall envelope design shall be considered to resist wind-driven rain where the results of testing indicate that water did not penetrate control joints in the exterior wall envelope, joints at the perimeter of openings penetration, or intersection of terminations with dissimilar materials."

- This exception requires that all systems without weather barriers be tested for air and water infiltration per ASTM E331

ASTM E331, Scope 1.2:

"This test method is applicable to any curtain-wall area or to windows, skylights, or doors alone."

ASTM E331, Scope 1.3:

"This test method addresses water penetration through a manufactured assembly. Water that penetrates the assembly, but does not result in a failure as defined herein..."

ICBO ES Report ER-3906, October 1, 2001, Figure 2, Page 6, "STO EIFS at Window Head":

Window head detail shows a head flashing.

ICBO ES Report ER-3906, October 1, 2001, Section 4.1 Findings:

"Construction is as set forth in this report and the manufacturer's instructions."

ICBO ES Report ER-3906, October 1, 2001, Section 4.5 Findings:

"Installation is by applicators trained by STO Corporation.

ICC Evaluation Report, AC24 Acceptance Criteria for Exterior Insulation and Finis Systems, Approved June 2003

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Section 5.7 (Exterior Wall Construction): "Plans, details, and specifications, concerning proper installation of the EIFS, that are applicable to the specific building under consideration, must be a part of documents submitted to the building official for approval. When installed on framed walls of Type V, Group R, Division 1 or Division 3 Occupancies (UBC), Type V, Group R1, R2, R3, R4 Occupancies (IBC), or building under the IRC, EIFS wall covering assemblies with drainage, defined in Section 2.2 are required."

Section 7.0 (Application): "Application instructions bearing the date of publication must be submitted. Instructions must include the information noted in Section 7.1 through 7.6. Installation details need to be consistent with assemblies tested under Section 6.10.3, as applicable."

Section 7.1.1 (Application): Flashing and/or sealing around heads, sills and jambs of windows and doors, and at the top of exposed walls.

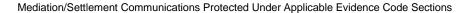
STO EIFS Details, April, 2000:

Detail 1.23a: Detail shows a window head flashing with note: "Flashing over window folder over window jamb-head interface"

STO EIFS Details, April, 2000, Detail 1.23a, Attention Section (bottom of the page)

Preliminary Defect Report

Panorama Towers Condominium Unit Owner's Association #18-5172.01





"Sto products are intended for use by qualified professional contractors, they should be installed in accordance with those specifications and Sto's instructions..."

Tower 2 EIFS Shops, Detail 4, Sheet F4.01:

Detail shows a window head condition without the head flashing

Resultant Damage:

Omission of window head flashings may result in water intrusion into occupied and concealed building spaces; resulting in damage to building components, finishes and personal property.



Exhibits

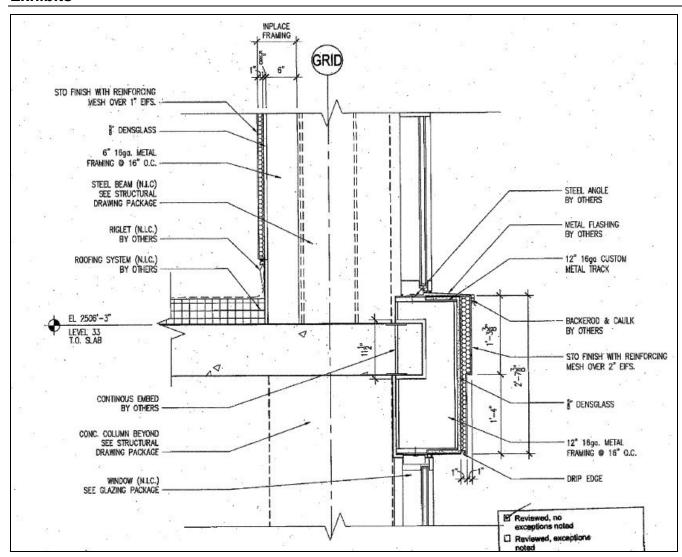


Exhibit 1 - Construction Drawings: EIFS Shop Drawing Detail 1 Showing no Sill Pan Flashing



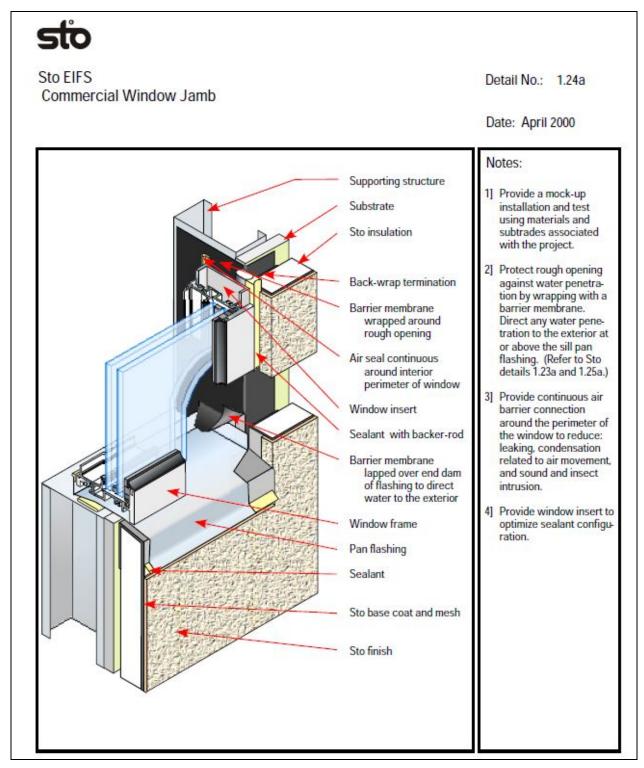


Exhibit 02 - Sill Pan Flashing Detail from Sto



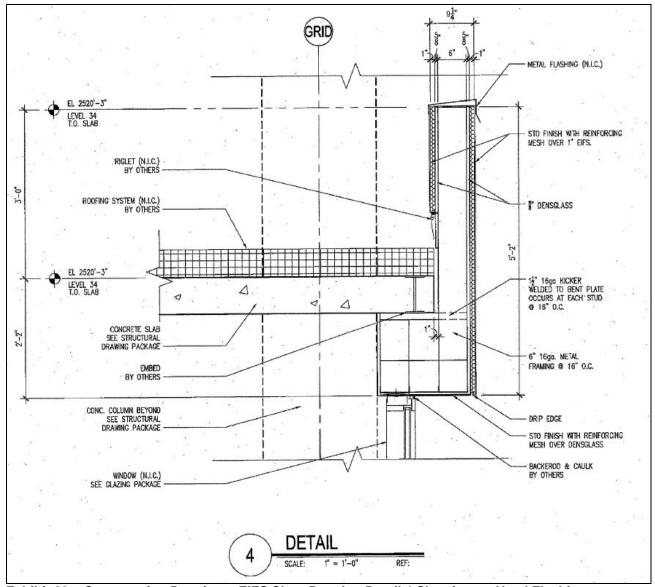


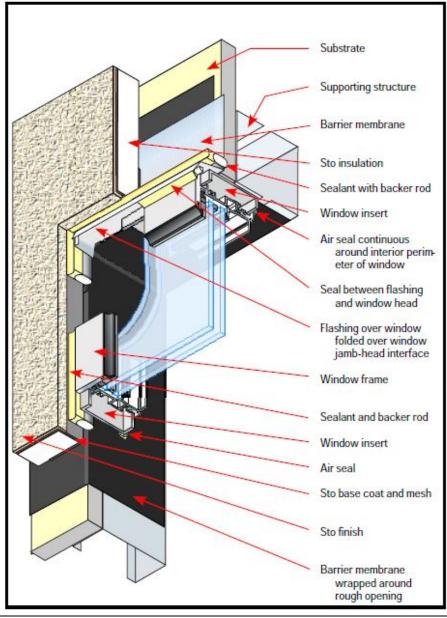
Exhibit 03 - Construction Drawings: EIFS Shop Drawing Detail 4 Showing no Head Flashing





Sto EIFS Commercial Window Head Detail No.: 1.23a

Date: April 2000



Notes:

- Provide a mock-up installation and test using materials and subtrades associated with the project.
- 2] Provide flashing installed over the window to direct water away from the window. Verify requirements for head flashing with local codes and window manufacturer. If not required, seal between window head and EIFS.
- 3] Protect rough opening against water penetration by wrapping with a barrier membrane. Direct any water penetration to the exterior at or above the sill pan flashing. (Refer to Sto details 1.24a and 1.25a)
- 4] Provide continuous air barrier connection around the perimeter of the window to reduce: leaking, condensation related to air movement, and sound and insect intrusion.

Exhibit 04 - Head Flashing Detail from Sto



CMA Consulting - Investigations Catalog

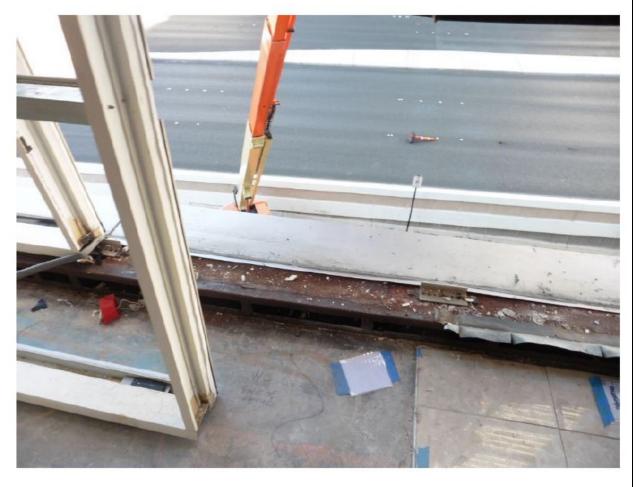


Exhibit 5 – CMA Consulting Photograph: Depicting Omission of Sill Pan Flashing



CMA Consulting - Investigations Catalog



Exhibit 6 - CMA Consulting Photograph: Depicting Omission of Sill Pan Flashing



CMA Consulting - Investigations Catalog



Exhibit 7 - CMA Consulting Photograph: Depicting Omission of Head Flashings



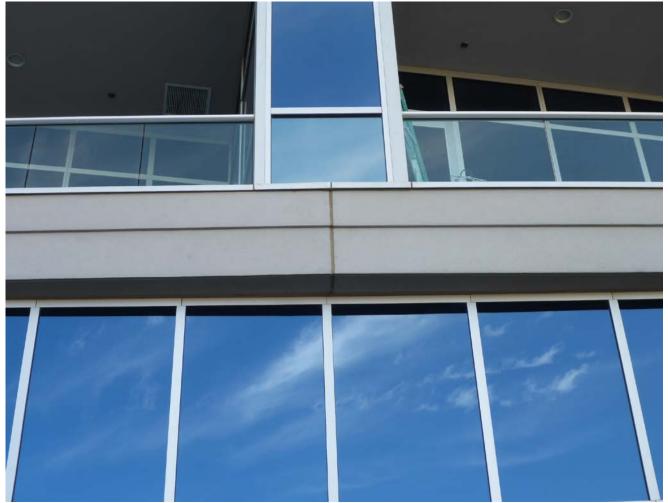


Exhibit 8 - ABBAE Photograph: View of the Tower Window System Showing Omission of Head Flashing





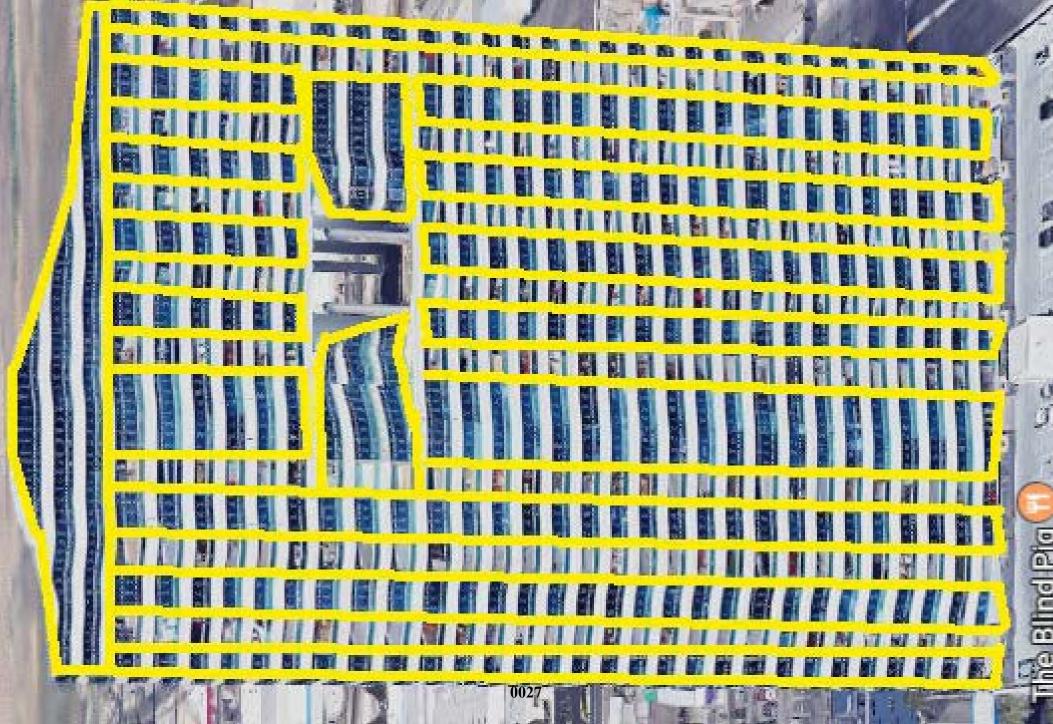
Exhibit 9 – ABBAE Photograph: View of the Tower Window System Showing Omission of Head Flashing

EXHIBIT B

EXHIBIT B

EXHIBIT B

Tower 1 – East Side Windows



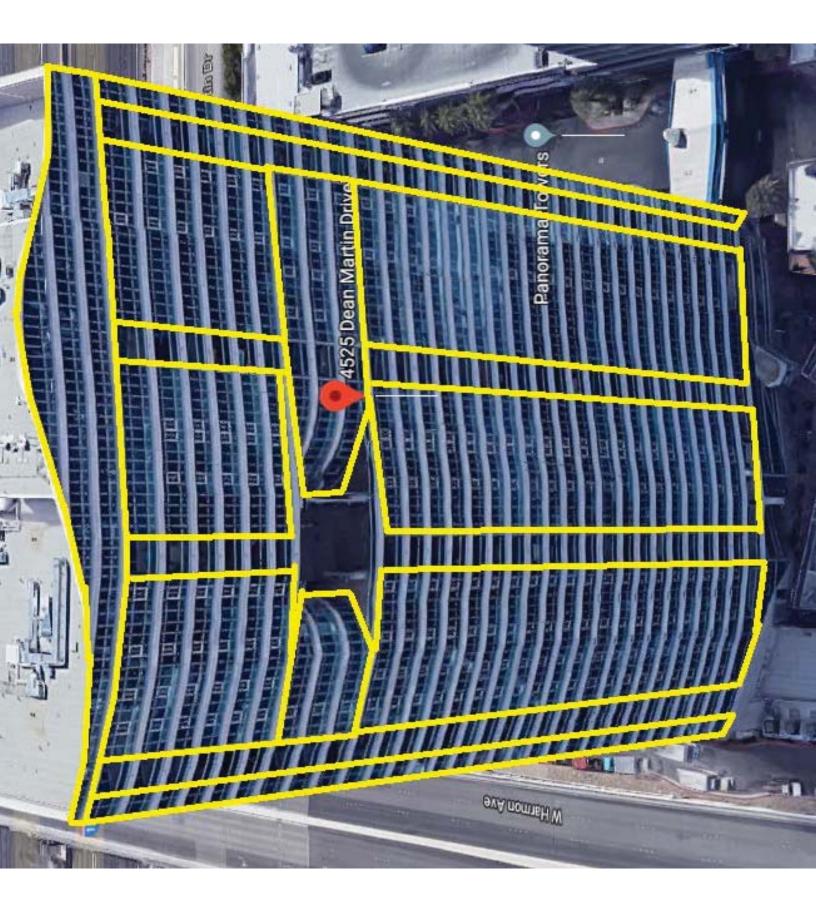
Tower 1 – North Side Windows



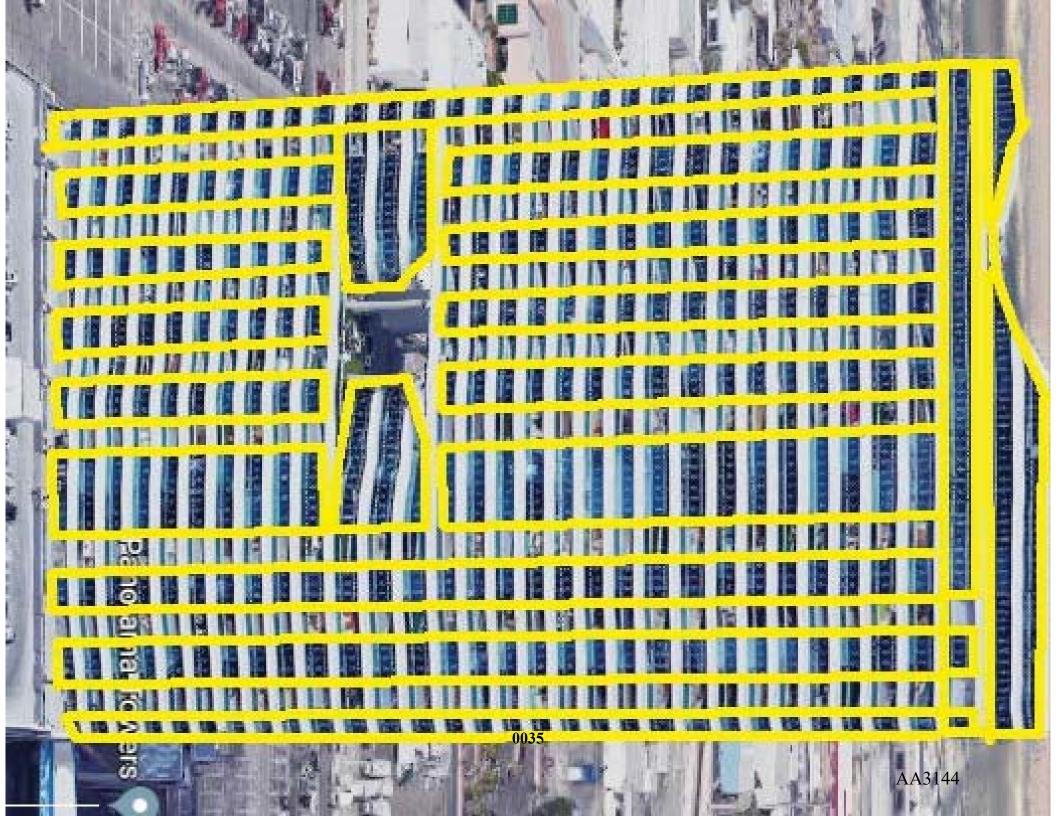
Tower 1 – South Side Windows



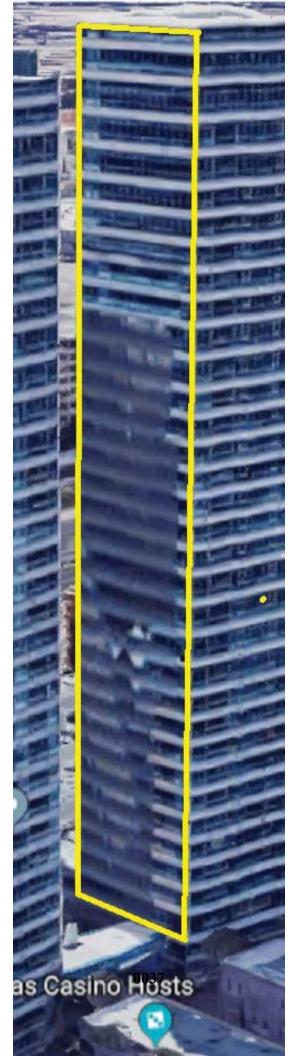
Tower 1 – West Side Windows



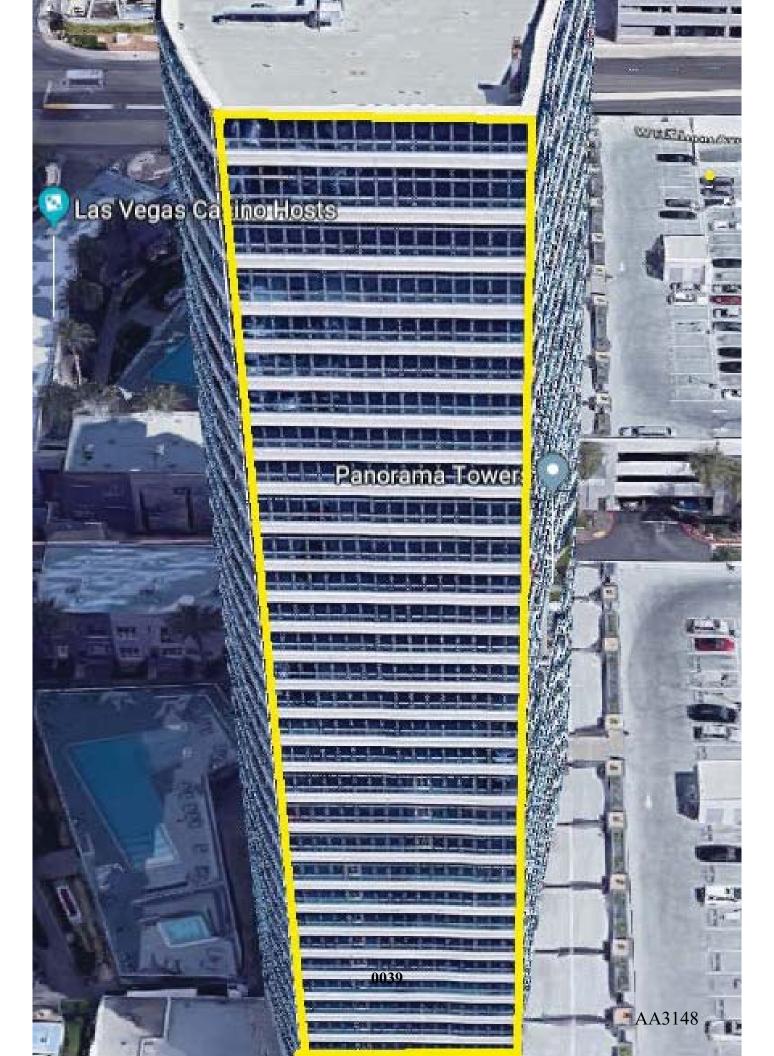
Tower 2 – East Side Windows



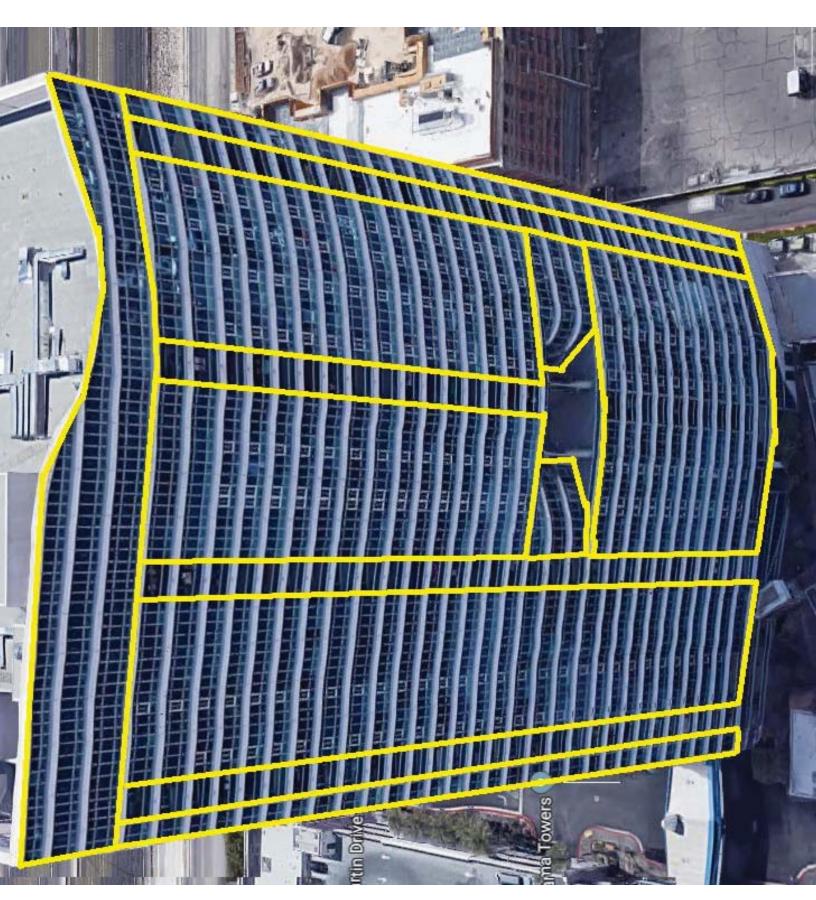
Tower 2 – North Side Windows



Tower 2 – South Side Windows



Tower 2 – West Side Windows



0041

EXHIBIT C

EXHIBIT C

EXHIBIT C

1	Francis I. Lynch, Esq. (Nevada Bar No. 4145)	_	
2	Charles "Dee" Hopper, Esq. (Nevada Bar No. 6346) LYNCH HOPPER, LLP 1210 S. Valley View Blvd., Suite 208 Las Vegas, Nevada 89102		
3			
4	Telephone:(702) 868-1115		
5	Facsimile:(702) 868-1114		
6	Scott Williams (California Bar No. 78588) WILLIAMS & GUMBINER LLP		
7	100 Drakes Landing Road, Suite 260 Greenbrae, California 94904		
8	Telephone:(415) 755-1880		
9	Facsimile:(415) 419-5469 (Admitted Pro Hac Vice)		
10	Counsel for Defendant		
11	EIGHTH JUDICIAL DISTRICT COURT		
12	CLARK COUNTY, NEVADA		
13	1		
14	LAURENT HALLIER, an individual;		
15	PANORAMA TOWERS I, LLC, a Nevada limited liability company; PANORAMA	CASE NO.: A-16-744146-D	
16	TOWERS I MEZZ, LLC, a Nevada limited liability company and M.J. DEAN	DEPT. NO.: XXII	
17	CONSTRUCTION, INC., a Nevada Corporation,		
18	Plaintiffs,		
19	VS.		
20	PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION, a Nevada		
21	non-profit corporation,		
22	Defendant.		
23			
24	PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION, a Nevada		
25	non-profit corporation, and Does 1 through 1000,		
26	Counterclaimants,		
27	vs.		
28	LAURENT HALLIER, an individual:		

LYNCH HOPPER, LLP 1210 S. Valley View Blvd. Suite 208 Las Vegas, NV 89102 702-868-1115

1 of 6

1 2	PANORAMA TOWERS I, LLC, a Nevada limited liability company; PANORAMA TOWERS I MEZZ, LLC, a Nevada limited liability company; M. I. DEAN		
3	liability company; M.J. DEAN CONSTRUCTION, INC., a Nevada Corporation; SIERRA GLASS & MIRROR, INC.; F. ROGERS CORPORATION,; DEAN ROOFING COMPANY; FORD CONTRACTING, INC.; INSULPRO, INC.; XTREME XCAVATION;		
4			
5			
6	SOUTHERN NEVADA PAVING, INC.; FLIPPINS TRENCHING, INC.; BOMBARD		
7	MECHANICAL, LLC; R. RODGERS CORPORATION; FIVE STAR PLINBING &		
8	HEATING, LLC, dba Silver Star Plumbing; and ROES 1 through 1000, inclusive,		
9	Counterdefendants.		
10			
11			
12	AFFIDAVIT OF OMAR HINDIYEH IN SUPPORT OF		
13	PANORAMA'S OPPOSITION TO HALLIER'S MOTION FOR PARTIAL SUMMARY JUDGMENT		
14	STATE OF NEVADA)		
15) ss: COUNTY OF CLARK)		
16	I, Omar Hindiyeh, being first duly sworn, state as follows:		
17	1. I received a Bachelor of Science degree in civil engineering from San Jose State		
18	University in 1978. I am a licensed general contractor in California (license no. 757672) and in		
19	Nevada (license no. 53133). I am the owner and president of CMA Consulting (CMA), formed in		
20	1985, which specializes in construction management and forensic investigation services. A copy		
21	of my CV, which includes my licenses, certifications and professional affiliations, is attached		
22	hereto as Exhibit 1.		
23	2. If called as a witness, I could and would testify to the matters stated herein based		
24	on my own personal knowledge.		
25	3. CMA Consulting was retained by the Panorama Towers Condominium Unit		
26	Owners' Association in August, 2013, to investigate and repair leakage conditions in one of the		
27	units of the Panorama development, Unit 300, located on the third story of Tower 1, 4525 Dean		
28			

LYNCH HOPPER, LLP

1210 S. Valley View Blvd. Suite 208 Las Vegas, NV 89102 702-868-1115 Martin Drive, Las Vegas. When CMA was retained, the walls had all already been opened by another contractor and the mold conditions in the wall assemblies had been remediated.

- 4. I was personally involved in all phases of CMA's investigation and repair of Unit 300, which took place over the period August 2013 through July 2016, at a total cost of \$206,058 (exclusive of demolition and mold remediation).
 - 5. The conditions in Unit 300 that required repair were twofold:
- (a) Window leakage The exterior wall window assemblies were not properly designed with drainage provisions, such as sill pans and weepage components, with the result that water entering the window assemblies was not diverted to the exterior of the building, but instead drained into the wall assemblies below and adjacent to the windows, causing corrosion to the metal framing components of the exterior wall assemblies, including the curb walls that support the windows, thereby compromising the structural integrity of the exterior walls.
- (b) Fire blocking and insulation While investigating the leakage conditions in Unit 300, we discovered that insulation was missing in the ledger shelf cavities and that fire blocking was missing in the steel stud framing cavities at the exterior wall locations between residential floors in the two tower structures. The plans called for insulation and fire blocking, as required by the building code, at these locations. The purpose of the fire blocking and insulation is to deter the spread of fire from one tower unit to the units above or below, and to prevent condensation from occurring within the exterior wall assemblies.
- 6. From November, 2015, through January, 2016, CMA inspected 15 units in the two towers to determine if the conditions observed in Unit 300 existed in other units in the towers. Units in the two towers were selected from different floors and with different facing exposures to obtain a mixed sampling. The inspections, which typically included multiple locations within each unit inspected, included pulling back carpet, removing electrical outlet faceplates, pulling back baseboards and/or cutting through the sheetrock behind the baseboards. These inspections yielded the following results:
 - (a) Window leakage The steel stud framing was found to be corroded as the

result of leakage in 76% of the window locations inspected.

- (b) Fire blocking and insulation Of the ledger shelf cavities inspected, 76% had no insulation. Many of the steel stud framing cavities had questionable and/or a lack of proper fire blocking provisions.
- 7. For purposes of responding to Hallier's motion, CMA was asked to estimate the costs that would be required to perform the following:
- (a) Identify "in specific detail ... the exact location of each ... defect, damage and injury" related to (i) leakage through the window assemblies that is causing corrosion damage to the metal framing components of the building, and (ii) required fire blocking and insulation that is missing.
- (b) Schedule and have a CMA representative "present" for inspections by Hallier's representatives to provide them with the identifications described in Paragraph 7(a), above.
- 8. In order to perform the above functions, the following steps would be required for each unit in each of the two towers:
- (a) Preparation It would be necessary to retain a contractor to first remove all furniture and fixtures adjacent or connected to the exterior walls of the unit, and pull back any carpeting from those areas. In the case of kitchens, this would include the removal of cabinetry and built-in kitchen appliances on the exterior walls. The removed furniture, fixtures and appliances would have to be stored in a secure location if there is insufficient room within the unit. The contractor would have to then provide protective floor coverings for paths of ingress and egress and the work areas adjacent to the exterior walls.
- (b) Destructive testing In order to identify "the exact location of each ... defect, damage and injury" related to (i) corrosion, mold and other damage caused by leaking windows, and (ii) missing insulation and fire blocking, the following destructive testing would be required: Remove all baseboards along the entire length of the exterior walls of the unit, remove all sheetrock covering the curbs below each of the windows, and remove all water proof membranes, mineral wool and fiberglass insulation from the curbs.

LYNCH HOPPER, LLP 1210 S. Valley View Blvd. Suite 208 Las Vegas, NV 89102 702-868-1115 (c) Inspection – It would be necessary to have a CMA representative and Hallier's representative present for the above testing to conduct an inspection to identify "in specific detail ... the exact location of each ... defect, damage and injury." They would have to be present during the testing, instead of after the testing is completed, because, for example, evidence of "damage" – *e.g.*, evidence of biological growth on the back of sheetrock – would be removed during the testing. Notably, inherent delays are involved when scheduling mutually convenient dates and times when multiple parties are involved, which would add to the cost of the inspections.

- (d) Put-back work It be necessary following the inspection to have the contractor return and install insulation and waterproof membrane in all the curbs, reinstall cabinetry, fixtures and appliances that had been removed (and/or stored), touch-up paint the cabinetry, replace the sheetrock and baseboard that had been removed, repaint the baseboard, retexture and repaint the sheetrock on walls that had been painted, replace wallpaper or other wall coverings where appropriate, replace all carpeting furniture that had been removed (and/or stored) from the exterior wall locations.
- 9. CMA estimates that the foregoing expenses for the work and materials provided by a contractor, storage of the occupant's property, and charges for CMA's services would amount to an average cost of \$13,145 per unit. There are 616 "standard" units in the two towers, which would bring the total cost to \$8,097,320 (\$13,145 x 616 units) for the standard units. This does not include an additional 20 townhouse units, 12 lofts and retail and office space in the two towers, the testing and inspections of which would substantially increase this estimated cost.
- 10. Also, the above cost does not include the cost of placing the occupants in temporary housing during the testing and inspections.
- 11. Performing the above described testing and inspections, at a cost of \$8,097,320 for the 616 "standard" units, would result in a phenomenal waste of money, as all these costs would have to be duplicated when the Association subsequently undertakes to repair the defects involved.
 - 12. I declare under the penalty of perjury under the laws of Nevada that the foregoing

is true and correct. If called as a witness, I could and would competently testify thereto.

Omar Hindiyeh

SUBSCRIBED and SWORN to before me this 26 day of April, 2017.

Artan Nat

NOTARY PUBLIC



LYNCH HOPPER, LLP 1210 S. Valley View Blvd. Suite 208 Las Vegas, NV 89102 702-868-1115

6 of 6

EXHIBIT "I"

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JASON H DANG'
BIKADLEY D BACE'
PRTER M JAYNES'

March 29, 2016

VIA E-MAIL

Edward Song, Esq. esong@leachjohnson.com LEACH JOHNSON SONG & GRUCHOW Scott Williams, Esq. swilliams@williamsgumbiner.com LAW OFFFICE OF WILLIAMS & GUMBINER, LLP

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/Insured:

Panorama Towers I, LLC, Panorama Towers 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 of Contractor Pursuant to Nevada Revised

Statutes, Section 40.645

Dear Counsel:

On February 24, 2016, Panorama Towers Condominium Unit Owners' Association (the "HOA") served a Notice to Contractor Pursuant to Nevada Revised Statutes, Section 40.645. The Notice identified four categories of purported construction defects.

The Notice did not contain necessary information regarding the alleged sewer line, including the date of occurrence and the date of repair. Please provide that information at your earliest convenience. In addition, please confirm the current location of any sewer line materials that were removed and replaced as part of the repair.

Riverside Denver Reno Berkelev Phoenix San Diego Los Angeles Newport Beach Las Vegas 619.236.0048 510.540.4881 602.274.1204 951,276,9020 303.256,6327 775.398.3087 949,221,1000 702.258.6665 818.712.9800 H:\1287\551\Corr\Counsel 002.docx

Edward Song, Esq. Scott Williams, Esq. BWB&O File No.: March 29, 2016 Page 2

During the recent inspection of the alleged mechanical room piping issues, it became apparent that the vast majority of the alleged corroded pipes had already been replaced. Please provide the date(s) when that work was done and the identity of the contractor(s). Please also confirm whether and where the removed pipes have been stored for safekeeping.

This letter is not intended to serve as my clients' formal response to the Chapter 40 Notice. All rights are reserved and a formal response to the Chapter 40 Notice will be timely provided as per statute.

Should you have any questions regarding the above, please do not hesitate to contact the undersigned.

Very truly yours,

BREMER WHYTE BROWN & O'MEARA LLP

Peter C. Brown, Esq.

pbrown@bremerwhyte.com PCB:as

EXHIBIT "J"

BREMER WHYTE

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PETER M. JAYNES

April 29, 2016

VIA E-MAIL

Edward Song, Esq. esong@leachjohnson.com LEACH JOHNSON SONG & GRUCHOW Scott Williams, Esq. swilliams@williamsgumbiner.com LAW OFFFICE OF WILLIAMS & GUMBINER, LLP

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:

Panorama Towers I, LLC, Panorama Towers 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 of Contractor Pursuant to Nevada Revised Statutes, Section 40.645

Dear Mr. Song and Mr. Williams:

On March 29, 2016, we sent you correspondence relating to your client's February 24, 2016 Chapter 40 Notice. We have not received any response.

We request that you please promptly provide the information we requested relating to the alleged sewer line defect, including the date of occurrence and the date of repair. We also as that you provide us with the address of where any of the sewer line materials that were removed and replaced as part of the repair are being stored.

Denver Reno Phoenix Riverside Berkeley San Diego Newport Beach Las Vegas Los Angeles 949.221.1000 702.258.6665 818.712.9800 619.236.0048 510.540.4881 602.274.1204 951.276.9020 303.256.6327 775.398.3087 H:\1287\551\Corr\Counsel 003 edited,docx

Edward Song, Esq. Scott Williams, Esq. April 29, 2016 Page 2

In addition, we request that you provide the date when any of the alleged corroded mechanical room pipes were replaced, the date(s) when this work was performed and the name and address of the contractor that performed this work. Please also confirm whether and where the removed pipes have been stored for safekeeping.

Please provide the above information no later than May 3, 2016.

This letter is not intended to serve as our clients' formal response to the Chapter 40 Notice. All rights are reserved and a formal response to the Chapter 40 Notice will be timely provided as per statute.

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 "K"



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MATTHEW P. HYTREK¹

MICHELLE N. GONZALEZ

December 28, 2018

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED AND VIA E-SERVICE

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

CERTIFIED MAIL #70180680000050941801 CERTIFIED MAIL #70180680000050941788

Francis I. Lynch, Esq. LYNCH HOPPER, LLP 1210 S. Valley View Blvd., Suite 208 Las Vegas, NV 89102

Scott Williams, Esq. LAW OFFFICE OF WILLIAMS & GUMBINER, LLP 101 B Street, Suite 200 San Rafael, CA 94901





December 28, 2018

Page - 2 -

CERTIFIED MAIL #70180680000050941795

Michael J. Gayan, Esq. KEMP JONES & COULTHARD, LLP 3800 Howard Hughes Pkwy, 17th Floor Las Vegas, NV 89169

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, Panorama Towers I, LLC, Panorama

Towers I Mezz, LLC and M.J. Dean Construction, Inc.

Construction, Inc.

BWB&O File No.: 1287.551

Subject: Panorama Towers Condominium Unit Owners'

Association April 5, 2018 Notice to Contractor Pursuant

to Nevada Revised Statutes, Section 40.645

Dear Mr. Lynch, Mr. Williams and Mr. Gayan:

Please allow the following correspondence to serve as Defendants Laurent Hallier, Panorama Towers I, LLC, Panorama Towers I Mezz, LLC and M.J. Dean Construction, Inc.'s (collectively "Respondents") Response to the Panorama Towers Condominium Unit Owners' Association's ("Claimant") *Amended Notice of Claims Pursuant to NRS 40.645 to Contractor dated April 5, 2018* ("Amended Chapter 40 Notice"), pursuant to NRS 40.6472.

I. OBJECTION TO CLAIMANTS' AMENDED CHAPTER 40 NOTICE

Claimants' Amended 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 Amended Chapter 40 Notice is Deficient

Claimant's Amended Chapter 40 Notice fails to sufficiently identify that the alleged conditions listed therein present an unreasonable risk of injury to a person or property. Claimant's Amended Chapter 40 Notice further fails to sufficiently identify that the alleged conditions listed therein were not completed in a good and workmanlike manner and have proximately caused





December 28, 2018

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physical damage to the residences, appurtenances or the real property to which the residences or appurtenances are affixed.

Pursuant to NRS 40.645(2) 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)).

As per the Court's ruling in its Findings of Fact, Conclusions of Law and Order filed on November 30, 2018, Claimant's Amended Chapter 40 Notice is deficient, in that it fails to comply with NRS 40.645(2) (b) and (c) in regard to the fire blocking and sewer issues. Respondents reserve their right to object and in no way are waiving their position that the Court's ruling as to the application of NRS 40.645(2) to the window issues is incorrect.

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

i. A Bar to all of Claimant's Claims

a. <u>Claimant's Claims Accrued After the Effective Date of AB 125, and therefore, No Grace Period is Applicable</u>

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:





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- (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 the effective date of AB 125 (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 year after the effective date of this act. . . ." AB 125, section 21(6)(a).

The word "accrued" in the construction defect context is not defined under NRS 40.600, et seq. Prior to the enactment of AB 125, the Nevada Supreme Court in <u>Beazer Homes Nev., Inc. v. Eighth Jud. Dist. Ct.</u> reasoned that a claim generally accrues when a "litigant discovers, or reasonably should have discovered, facts giving rise to the action. . ." 120 Nev. 575, 585-86 (2004). In construction defect cases, "the statute of limitations does not begin to run until the time the plaintiff learns, or in the exercise of reasonable diligence should have learned, of the harm to the property." <u>Id</u>. This analysis applies only to statutes of limitation, not statutes of repose.

Nonetheless, the word "accrues" as set forth in AB 125 does not apply to a statute of limitation or statute of repose. Instead, it applies 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 <u>prior to the effective date of the act</u> (February 24, 2015) in order to have the pre-AB 125 version of Chapter 40 apply to the case.

Here, Claimant's Chapter 40 Notice mailed its Chapter 40 Notice to Respondents on February 24, 2016, *after* the effective date of February 24, 2015. Therefore, the claim did not accrue prior to the effective date of AB 125, meaning the grace period was not applicable.

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



December 28, 2018

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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 1) 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.

b. Even if the Court Agrees that Claimant's Claims Accrued Prior to the Effective Date of AB 125, Claimant's Claims are Still Time-Barred

The statute of repose clock starts to run upon substantial completion of an improvement. *See* AB 125, Section 17, amending NRS 11.202(1). 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 1) and March 31, 2008 (Tower II), or by **January 15, 2014** and **March 30, 2014** respectively.

The legislative history of AB 125 expressed in the actual bill, Sec. 21, sub. 5, (although not in the statute itself), mandates that the new six (6) year statute of repose be applied retroactively. The Nevada Legislature provided a grace period of one year to protect claimants who would otherwise lose their rights by retroactive application. As explained below, Claimant in this action failed to commence its action within this grace period. Accordingly, its claims are barred.

"Commencement" of an action under AB 125 requires the filing of a complaint. Merely serving a Chapter 40 notice is insufficient. NRS 40.645(1)(a), NRS 40.645(4) and NRCP 3 make clear that "commencement" of an action requires filing a complaint.

NRS 40.645(1)(a) clearly delineates between giving notice and commencing an action, and requires that the notice must be given *before* the action is commenced:

"[B]efore a claimant commences an action or amends a complaint to add a cause of action for a construction defect against a contractor, subcontractor, supplier or design professional, the claimant:

(a) Must give written notice...

(emphasis added)

Additionally, NRS 40.645(4) provides, in pertinent part, that "Notice is not required pursuant to this section <u>before commencing an action</u>..." (emphasis added). NRS 40.645 clearly delineates two separate and distinct steps: "notice" must come before "commencing an action." This interpretation is consistent with NRCP 3. An action is "commenced" when the complaint is



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filed. See Volpert v. Papagna, 85 Nev. 437, 440, 456 P.2d 848, 850 (1969) (citing NRCP 3) ("A civil action is commenced by filing a complaint with the court.").

Here, the plain language of AB 125 indicates that an action must be "commenced" within the one-year grace period. This does not mean simply mailing a Chapter 40 notice within the one-year grace period. Commencement means filing a complaint with the court. *Papagna*, 85 Nev. At 440, 456 P.2d at 850 (*citing* NRCP 3). Even if the one-year grace period applied, Claimant still failed to commence its action against Respondents before the one-year grace period's expiration. Consequently, all of Claimant's claims are time-barred.





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III. RESPONSE TO ALLEGED DEFECTS

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

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





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Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
1	Windows: The window assemblies were defectively designed such that water entering the assemblies does not have appropriate means of exiting the assemblies.	Respondents disclaim any liability for this alleged defect. These alleged defects are time barred under NRS 11.202(1) and were released as part of the settlement of the prior litigation.
	The window assemblies were built in accordance with the project plan, which contained two significant design deficiencies that are identified in specific detail in the accompanying report prepared by Claimant's architect.	In addition, Claimant's Amended Chapter 40 Notice fails to comply with NRS 40.645(2) (b) and (c) in that it does not identify in specific
	Defect 1.01 – Omission of Pan Flashings at Window Assemblies: Contrary to applicable requirements of the 2000 IBC, ASTM and ICBO standards, and the EIFS manufacturer's installation instructions, the plans failed to specify pan flashings at the rough openings for	detail, the alleged damage and the exact location of the damage relating to these alleged defects. In addition, Claimant has failed to show that this condition falls within NRS 40.615, in that it fails to show
	the windows. Defect 1.02 - Omission of Pan Flashings at Window Assemblies: Contrary to applicable requirements of the 2000 IBC, ASTM and ICBO standards, and the EIFS manufacturer's installation instructions, the plans failed to specify pan flashings at the rough openings for the windows.	that the alleged conditions listed therein present an unreasonable risk of injury to a person or property or that they were not completed in a good and workmanlike manner and have caused physical damage to the residences, appurtenances or the real property to which the residence or appurtenance is affixed.
	This is a design deficiency that exists in all (100%) of the residential tower assemblies. This deficiency presents an unreasonable risk of injury to a person or property resulting from the	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



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B. Respondents' Response to Claimant's Alleged Defects Regarding the Residential Tower Exterior Wall Insulation (i.e., fire blocking)

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
2	Fire Blocking:	Respondents contend that by virtue of
	The plans called for fire blocking	the Court's Findings of Fact,
	insulation, as required by the building	Conclusions of Law and Order, filed
	code, in the ledger shelf cavities and steel	November 30, 2018, Claimant's
	stud framing cavities at the exterior wall	Amended Chapter 40 Notice is deficient
	locations between residential floors in the	per NRS 40.645 as it relates to the
	two tower structures. The purpose of this	alleged fire blocking issue.
	insulation is to deter the spread of fire	Respondents, therefore, have no duty to
	from one tower unit to the unit above or	respond to this defect allegation.
	below. However the insulation was not	
	installed as required by the plans and the	Nothing in this response shall be
	building code.	construed as Respondents' waiver of
		their right to object or respond to this
	This installation deficiency exists in the	defect allegation at a later time, as may
	majority of the locations where it is	be warranted or necessary, or required
	required for the 616 residential tower	under any statute or other law.
	units, in which insulation was omitted	
	either from the ledger shelf cavity, from	
	the steel stud framing cavity, or from	
	both.	
	This deficiency presents on unreasonable	
	This deficiency presents an unreasonable	
	risk of injury to a person or property	
	resulting from the spread of fire.	

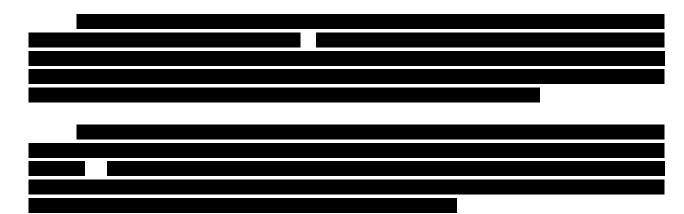


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C. Respondents' Response to Claimant's Alleged Defects Involving the Sewer Problem

Defect No.	Defect Allegation	Defendants' Response Pursuant to NRS 40.6472
3	Sewer Problems:	Respondents contend that by virtue of the
	The main sewer line connecting the	Court's Findings of Fact, Conclusions of
	Development to the city sewer system	Law and Order, filed November 30, 2018,
	ruptured due to installation error during	Claimant's Amended Chapter 40 Notice is
	construction, causing physical damage	deficient per NRS 40.645 as related to the
	to adjacent common areas. The rupture	alleged sewer issue. In addition,
	of the sewer line caused raw sewage to	Respondents were never notified of the
	be deposited on the common area of the	alleged sewer issue prior to renovation,
	development in the location of the	and thus, were not accorded the right to
	rupture. In addition to causing damage	inspect and repair. Respondents,
	in the vicinity of the rupture, the	therefore, have no duty to respond to this
	defective installation presented an	defect allegation.
	unreasonable risk of injury to a person	
	or property resulting from the	Nothing in this response shall be
	disbursement of unsanitary matter.	construed as Respondents' waiver of their
		right to object or respond to this defect
		allegation at a later time, as may be
		warranted or necessary, or required under
		any statute or other law.





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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

Peter C. Brown, Esq. Jeffrey W. Saab, Esq. Devin R, Gifford, Esq.

pbrown@bremerwhyte.com jsaab@bremerwhyte.com dgifford@bremerwhyte.com

EXHIBIT "L"

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

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Attn: Jeff Ganzer

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Fees

			<u> </u>		
00/09/2017	IWC 124	0 4104	DEVIEW/ANALYZE AND OUTLINE ADOLIMENTS IN	Hours	
09/08/2017	JWS L21		REVIEW/ANALYZE AND OUTLINE ARGUMENTS IN MOTION TO AMEND PLEADINGS IN PREPRATION OF DRAFTING OPPOSITION TO THE SAME. SPLIT WITH TOWER TWO FILE PER ADJUSTER REVIEW/ANALYZE LIMITED LEGAL RESEARCH ON	0.20	35.00
	000 L21	7,104	GOOD CAUSE, GOOD FAITH, AND ELEMENTS FOR AMENDMENTS TO PLEADINGS IN PREPARATION OF OPPOSITION TO THE SAME. SPLIT TIME WITH TOWER TWO CASE.	0.30	52.50
	JWS L21	0 A103	DRAFT/REVISE (BEGIN) OPPOSITION TO THE ASSOCIATION'S MOTION TO AMEND PLEADINGS, FACTS, AFFIDAVIT, ARGUMENTS, AND PRAYER FOR RELIEF. PER ADJUSTER, SPLIT TIME WITH SECOND		
	JWS L21	0 A104	TOWER CASE. REVIEW/ANALYZE (BEGIN) AND COMPARE PROPOSED AMENDED PLEADINGS SUBMITTED IN SUPPORT OF MOTION TO AMEND AGAINST CURRENT PLEADINGS TO ASSIST WITH OPPOSITION. TIME TO BE SPLIT WITH	0.90	157.50
09/11/2017	PCB L25	0 A103	TOWER II CASE PER ADJUSTER. DRAFT/REVISE (FINALIZE) OPPOSITION TO THE HOA'S RENEWED MOTION TO AMEND AND TO ENLARGE TIME TO SERVE SUBCONTRACTORS RE: ADDITIONAL DISCUSSION OF WHAT OCCURRED AT THE LAST HEARING ON THIS SAME TOPIC, HOW THE HOA IS FORGETTING THE COURT'S COMMENTS ABOUT WAITING FOR THE COURT'S RULING ON THE MOTION FOR SUMMARY JUDGMENT, AND RESERVING ARGUMENTS AS TO THE TIMING OF ANY AMENDMENTS TO THE THIRD-PARTY COMPLAINT THAT IS BEING PROPOSED BY COUNSEL FOR THE HOA (TIME SPLIT WITH OTHER FILE IN SAME CASE - 1287.558 - TOWER II).	0.30	52.50 26.25
09/12/2017	JWS L12	0 A104	REVIEW/ANALYZE CORRESPONDENCE FROM WESTERN NATIONAL ADJUSTER LORALEE THATCHER 0001	AA3177	

105.00

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				IN PREPRATION OF RESPONDING TO THE SAME RE-	Hours	
				IN PREPRATION OF RESPONDING TO THE SAME RE: CASE ACTIVITY. SPLIT TIME WITH TOWER II CASE PER ADJUSTER.	0.05	8.75
	JWS	L120	A104	REVIEW/ANALYZE (LIMITED SCOPE) CORRESPONDENCE/MOTES TO ASSIST WITH RESPONDING TO WESTERN NATIONAL ADJUSTER, LORALEE THATCHER. PER ADJUSTER, SPLIT TIME		
	JWS	L120	A108	WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH WESTERN NATIONAL ADJUSTER, LORALEE THATCHER, MEET AND CONFER RE: CASE ACTIVITY/STATUS OF	0.10	17.50
				TENDER/RESPONSE TO SAME. PER ADJUSTER, TIME SPLIT WITH TOWER II CASE.	0.05	8.75
09/18/2017	JWS	L240	A104	REVIEW/ANALYZE AND OUTLINE, 20 PAGES, COURT'S FINDINGS OF FACT, CONCLUSIONS OF LAW WITH RESPECT TO CLIENTS' MOTION FOR SUMMARY JUDGMENT. TIME TO BE SPLIT WITH TOWER II CASE.	0.15	26,25
	PCB	L240	A104	REVIEW/ANALYZE COURT'S 20 PAGE RULING ON MOTION FOR SUMMARY JUDGMENT IN ORDER TO BE ABLE TO REPORT ON THE RULING TO CLIENTS AND TO	0.15	20.25
	PCB	L240	A106	THE CARRIER (AS PER ADJUSTER REQUEST, TIME SPLIT WITH OTHER FILE DEALING WITH TOWER II). COMMUNICATE (WITH CLIENT) WITH RISK MANAGER	0.20	35.00
				FOR BOMBARD MECHANICAL RE: DISCUSSION OF THE COURT'S RULING ON THE MOTION FOR SUMMARY JUDGMENT AND WHY IT IS ESPECIALLY GOOD FOR BOMBARD MECHANICAL (AS PER REQUEST OF ADJUSTER, TI ME SPLIT WITH OTHER FILE DEALING WITH TOWER II).	0.10	17.50
09/19/2017	JWS	L230	A104	REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL	0.10	17.00
				MASTER HALE RE: FEBRUARY 22, 2018 SPECIAL MASTER HEARING. PER ADJUSTER, TIME TO BE SPLIT WITH TOWER II CASE.	0.05	8.75
09/25/2017	JWS	L240	A103	DRAFT/REVISE ENTRY OF ORDER RE: CLIENTS' MOTION FOR SUMMARY JUDGMENT.	0.05	8.75
09/27/2017	PCB	L120	A104	REVIEW/ANALYZE THE ORDER FROM THE COURT ON THE CLIENTS' MOTION FOR SUMMARY JUDGMENT AND MOTION FOR PARTIAL SUMMARY JUDGMENT, IN CONJUNCTION WITH ANALYSIS OF WHAT MIGHT BE GROUNDS FOR RECONSIDERATION OF THE ORDER BY THE HOA, AND PREPARE SUPPLEMENTAL STATUS REPORT TO CARRIER		
				PER CARRIER REQUEST - TIME SPLIT WITH OTHER	0.60	105.00

FILE IN SAME CASE - TOWER II).

0002

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	РСВ	L120	A104	REVIEW/ANALYZE ORIGINAL CC&RS	Hours	
				(AS PER CARRIER REQUEST, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.10	17.50
09/28/2017	JWS	L230	A104	REVIEW/ANALYZE/OUTLINE (BEGIN) TRANSCRIPT FROM HEARING ON MOTION TO ENLARGE TIME FOR SERVICE/OPPOSTION TO SAME, IN ORDER TO ASSIST WITH UPCOMING HEARING ON MOTION TO AMEND. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.10	17.50
09/29/2017	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM PLAINTIFF'S COUNSEL RE: PENDING MOTION, STAY OF CASE IN ORDER TO DETERMINE RELEVANCY. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.05	8.75
10/02/2017	PCB	L120	A104	REVIEW/ANALYZE (CONTINUE) AVAILABLE PROJECT INFORMATION TO ASSESS WHAT CLAIMS COULD SURVIVE IF WE WERE TO TAKE AN AGGRESSIVE POSITION ON THE COURT'S ORDER FOR THE MOTION FOR SUMMARY JUDGMENT/MOTION FOR PARTIAL SUMMARY JUDGMENT,		
				(AS PER CARRIER REQUEST - TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.20	35.00
10/03/2017	JWS	L340	A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE: SPLIT TIME WITH TOWER TWO CASE.	0.10	17.50
10/04/2017	JWS	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT WITH MKA, PER ADJUSTER, PLEASE SPLIT		
	JBV	L320	A104	WITH OTHER TOWER CASE. REVIEW/ANALYZE AND COMPILE FOUR VERSIONS OF THE PANORAMA TOWERS COVENANTS, CONDITIONS & RESTRICTIONS, RE: VERIFYING EACH IS COMPLETE, IN PREPARATION FOR PROVIDING CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS &	0.05	8.75
	JBV	L320	A108	PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S 0003	0.10 AA3179	9.50

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				EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	Hours	
	JBV	L320	A103	AS REQUESTED BY ATTORNEY, PRIOR TO UPCOMING MEETING. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: AS REQUESTED BY ATTORNEY, PRIOR TO UPCOMING MEETING.	0.05 0.05	4.75 4.75
10/05/2017	JWS	L340	A101	PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERT, MKA, RE:		
	JWS	L340	A108	ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE:	0.30	52.50
	JWS	L340	A104	PER ADJUSTER TIME TO BE SPLIT WITH OTHER TOWER CASE. REVIEW/ANALYZE PRESENTATION PREPARED BY MKA RE:	0.15	26.25
				PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.20	35.00
10/11/2017	PCB	L250	A104	REVIEW/ANALYZE PLAINTIFF'S MOTION FOR CLARIFICATION ON THE SEWER ALLEGATION AND THE FIRE BLOCKING ALLEGATION IN ORDER TO BEGIN ASSESSMENT OF POSSIBLE RESPONSE TO SAME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.10	17.50
10/18/2017	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM ADJUSTER, LORALEE THATCHER, RE: TENDER/CASE ACTIVITY IN PREPARATION OF RESPONDING TO THE SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.05	8.75
10/25/2017	PCB	L250	A101	PLAN AND PREPARE (BEGIN) FOR OPPOSITION TO THE HOA'S MOTION FOR CLARIFICATION OF THE COURT ORDER REGARDING PANORAMA'S MOTION FOR PARTIAL SUMMARY JUDGMENT RE: SET OUT BASIC ARGUMENTS WITH REGARD TO THE HOA'S CONTENTION THAT THE COURT ORDER IS UNCLEAR AS TO THE SEWER ISSUE AND UNCLEAR AS TO HOW EXTENSIVE THE INSPECTION MUST BE PERFORMED WITH REGARD TO THE FIRE BLOCKING ISSUE (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS	AA3180	5.10

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	PCB	L240	A104	PER DIRECTIVE OF CARRIER). REVIEW/ANALYZE (BEGIN) AVAILABLE INFORMATION AND COMPARE SAME TO MOTIONS FILED IN OTHER CASES DEALING WITH AB 125	Hours 0.20	35.00
	JWS	L240	A104	(TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). REVIEW/ANALYZE AND OUTLINE MOTION FOR RECONSIDERATION WITH BACK UP IN PREPRATION OF	0.10	17.50
	JWS	L240	A101	OPPOSITION TO THE SAME. PER ADJUSTER, SPLIT WITH TOWER II FILE. PLAN AND PREPARE FOR (BEGIN) STRATEGY FOR OPPOSITION TO MOTION FOR	0.25	43.75
				CLARIFICATION/RECONSIDERATION OF COURT'S ORDER. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.20	35.00
10/26/2017	JWS	L120	A104	REVIEW/ANALYZE E-MAIL FROM LORALEE THATCHER RE: TENDER, STATUS OF CASE, THEN REPLIED TO SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.05	8.75
	JWS	L240	A104	REVIEW/ANALYZE ATTORNEY NOTES, CORRESPONDENCE, COURT FILINGS AND MINUTE ORDER TO ASSIST WITH OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER	0.00	0.70
	JWS	L240	A103	ADJUSTER REQUEST. DRAFT/REVISE (BEGIN) OPPOSITION TO MOTION FOR CLARIFICATION/RECONSIDERATION. FACTS, PROCEDURAL SUMMARY, LEGAL STANDARD AND INITIAL ARGUMENT. PER ADJUSTER REQUEST, SPLIT	0.25	43.75
10/27/2017	JWS	L240	A103	TIME WITH SECOND TOWER FILE. DRAFT/REVISE (SUPPLEMENTED) OPPOSITION TO	0.85	148.75
		L240		MOTION FOR CLARIFICATION RE: FIRE BLOCKING ARGUMENT.PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. COMMUNICATE (OTHER EXTERNAL) WITH SHELLY	0.15	26.25
	0000	LZ+O	A100	FROM MKA,		
	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH MICHELLE ROBBINS (EXPERT) RE:	0.10	17.50
				(TIME SPLIT WITH FILE IN SAME CASE - TOWER II - AS 0005	AA3181	

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	PCB	L250	A104	PER DIRECTIVE OF THE CARRIER). REVIEW/ANALYZE PORTIONS OF THE CLIENTS' ORIGINAL MOTION FOR SUMMARY JUDGMENT, THE ASSOCIATION'S OPPOSITION TO SAME, AND THE CLIENTS' REPLY BRIEF IN ORDER TO PULL OUT SPECIFIC SECTIONS OF THOSE PLEADINGS TO USE TO CONTINUE PREPARATION OF THE CLIENTS' OPPOSITION TO THE ASSOCIATIONS' MOTION FOR CLARIFICATION OF THE COURT'S ORDER RE: USING THIS INFORMATION TO PROVE TO THE COURT THAT THE ASSOCIATION'S MOTION IS ACTUALLY AN IMPROPER MOTION FOR RECONSIDERATION WITH REGARD TO THE FIRE BLOCKING ALLEGATION (TIME	Hours 0.20	35.00
	JWS	L350	A108	SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF THE CARRIER). COMMUNICATE (OTHER EXTERNAL) INITIAL CALL WITH EXPERT MKA,	0.60	105.00
	JWS	L350	A104	REVIEW/ANALYZE PLANS FOR BOTH TOWERS 1 AND 2 IN PREPARTION OF FURTHER DISCUSSION. PER ADJUSTER, SPLIT TIME	0.10	17.50
	JWS	L350	A108	WITH SECOND TOWER CASE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH EXPERT, MEET AND CONFER RE:	0.15	26.25
	JWS	L350	A107	ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE. COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH OPPOSING COUNSEL X2 MEET AND CONFER RE: MOVING UPCOMING HEARING ON MOTION FOR CLARIFICATION, BASIS FOR SAME. PER ADJUSTER, SPLIT TIME WITH SECOND TOWER CASE.	0.15 0.05	26.25 8.75
10/30/2017	JWS	L120	A108	COMMUNICATE (OTHER EXTERNAL) WITH OPPOSING COUNSEL, MEET AND CONFER RE: MOTION FOR CLARIFICATION. SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST.	0.05	8.75
10/31/2017	JWS	L120	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH FRANCIS LYNCH, FURTHER DISCUSSION RE: MOTION FOR CLARIFICATION/HEARING AS TO SAME.	0.10	17.50
		L120		DRAFT/REVISE PROPOSED STIPULATION AND ORDER TO CONTINUE HOA'S HEARING ON MOTION FOR CLARIFICATION. SPLIT TIME WITH SECOND TOWER CASE. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. COMMUNICATE (OTHER OUTSIDE COUNSEL)	0.10	17.50
	3443	LIZU	AIUI	FOLLOW-UP WITH FRANCIS LYNCH X 2 RE: PROPOSED STIPULATION AND ORDER RE: HEARING ON HOA'S MOTION FOR CLARIFICATION. SPLIT TIME WITH SECOND TOWER CASE PER ADJUSTER REQUEST. 0006	0.10 AA3182	17.50

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		1040			Hours	
		L340		COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MKA X 2, MEET AND CONFER RE: SUPPLEMENTAL OPPOSITION TO MOTION FOR CLARIFICATION RE: FIRE-BLOCKING. SPLIT TIME WITH TOWER TWO CASE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP WITH MKA RE: ANALYSIS OF FIRE STOPPING ISSUES. SPLIT TIME WITH TOWER TWO CASE. PER ADJUSTER	0.10	17.50
11/01/2017	IWS	L120	A101	REQUEST, SPLIT TIME WITH SECOND TOWER FILE. PLAN AND PREPARE FOR (BEGIN) CALL WITH EXPERT,	0.10	17.50
11/01/2017	3773	LIZU	Alui	PER ADJUSTER, PLEASE SPLIT TIME WITH TOWER 2 CASE.	0.30	52.50
	JWS	L120	A108		0.00	02.00
	JWS	L120	A103	SPLIT TIME WITH TOWER 2 CASE.	0.35	61.25
				PLEASE SPLIT TIME WITH TOWER TWO CASE.	0.15	26.25
11/02/2017	JWS	L120	A101	PLAN AND PREPARE FOR EXPERT MEETING WITH MKA,		
	JWS	L120	A109	TIME TO BE SPLIT WITH TOWER 2 CASE. APPEAR FOR/ATTEND CONFERENCE CALL WITH EXPERT MKA,	0.45	78.75
	JWS	L120	A104	SPLIT TIME WITH TOWER 2 CASE. REVIEW/ANALYZE CORRESPONDENCE FROM COURT RE: STIPULATION AND HEARING ON MOTION FOR	0.15	26.25
	JWS	L120	A107	CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH	0.05	8.75
	JWS	L120	A103	PLAINTIFF'S COUNSEL X 3, MEET AND CONFER RE: PROPOSED/REVISED STIPULATION AS TO MOTION FOR CLARIFICATION. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. DRAFT/REVISE PROPOSED/REVISED STIPULATION AND ORDER RE: MOTION FOR CLARIFICATION IN ACCORDANCE WITH DIRECTIVE FROM JUDGE	0.15	26.25
				JOHNSON. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.15	26.25
11/03/2017	JWS	L120	A103	DRAFT/REVISE (BEGIN) SUMMARY OF EXPERT ANALSYIS RE: 0007	AA3183	

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					Hours	
	JWS	L230	A101	PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. PLAN AND PREPARE FOR (BEGIN) MANDATORY	0.20	35.00
	PCB	L240	A104	CONSTRUCTION DEFECT SWEEPS WEEK HEARING TO DISCUSS CASE ACTIVITY/DISCOVERY AND TRIAL WITH JUDGE. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE. REVIEW/ANALYZE EMAIL FROM COUNSEL FOR VICTAULIC REGARDING IMPACT OF THE COURT'S RULING ON THE MECHANICAL ROOM DEFECTS AND	0.30	52.50
	PCB	L130	A108	PREPARE EMAIL IN RESPONSE TO SAME (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF CARRIER). COMMUNICATE (OTHER EXTERNAL) WITH CLIENTS' EXPERT (MKA) RE:	0.05	8.75
				(TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II - AS PER DIRECTIVE OF THE CARRIER).	0.20	35.00
11/06/2017	JWS	L230	A101	PLAN AND PREPARE FOR (FINALIZE) MANDATORY COURT STATUS CHECK RE: CASE ACTIVITY/DISCOVERY AND IN PREPARATION OF STATUS UPDATE TO COURT. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.15	26.25
	JWS	L230	A109	APPEAR FOR/ATTEND MANDATORY COURT STATUS CHECK HEARING WITH ALL COUNSEL, RE: CASE ACTIVITY, PLEADINGS, DISCOVERY AND AGENDA MOVING FORWARD. NO TRAVEL TIME IN ENTRY. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND	0.13	20.20
	JWS	L230	A103	TOWER FILE DRAFT/REVISE (BEGIN) SUMMARY OF MANDATORY COURT HEARING, AND JUDGE'S COMMENTS TO ASSIST WITH FURTHER CASE HANDLING. PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.45	78.75 8.75
11/21/2017	PCB	L250	A104	REVIEW/ANALYZE ALL PLEADINGS FILED RELATED TO THE HOA'S MOTION FOR CLARIFICATION OF THE COURT'S ORDER ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY JUDGMENT, FIND PORTIONS OF ORIGINAL PLEADINGS ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY JUDGMENT TO USE AS EXHIBITS, OUTLINE ORAL ARGUMENTS TO USE DURING THIS MORNING'S HEARING, AND PRACTICE ORAL ARGUMENTS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH		
	PCB	L250	A109	TOWER II). APPEAR FOR/ATTEND HEARING ON THE HOA'S MOTION FOR CLARIFICATION OF THE COURT'S ORDER ON THE BUILDERS' MOTION FOR PARTIAL SUMMARY	1.10	192.50
				JUDGMENT (AS PER CARRIER DIRECTIVE, TIME SPLIT 0008	AA3184	

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				WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II; BOTH PCB AND JESS SAAB APPROVED TO ATTEND HEARING; PCB BILLED MORE TIME FOR ATTENDANCE AT HEARING BECAUSE JEFF SAAB WAS AT A HEARING IN ANOTHER MATTER AT THE BEGINNING OF THE HEARING IN THIS CASE; NO	Hours	
	JWS	L230	A101	TRAVEL TIME INCLUDED IN THIS ENTRY). PLAN AND PREPARE FOR (FINALIZE) HEARING ON HOA MOTION FOR CLARIFICATION, REVIEW/NOTES ON CHAPTER 40 DEFECT PACKET PER ADJUSTER	1.60	280.00
	JWS	L230	A109	REQUEST, SPLIT TIME WITH SECOND TOWER FILE. APPEAR FOR/ATTEND HEARING ON HOA'S MOTION FOR CLARIFICATION OF COURT'S ORDER/ CLIENTS' OPPOSITION TO THE SAME. PARTIAL ATTENDANCE AT HEARING DUE TO OVERLAP WITH APPEARANCE IN A DIFFERENT MATTER. HOWEVER, PCB ATTENDED ENTIRE HEARING PER ADJUSTER REQUEST, SPLIT TIME WITH SECOND TOWER FILE.	0.20	35.00 183.75
11/29/2017	JWS	L120	A108	COMMUNICATE (OTHER EXTERNAL) WITH ADJUSTER FOR FLIPPINS TRENCHING, MEET AND CONFER RE: CASE ACTIVITY. PER ADJUSTER, SPLIT TIME WITH	1.05	103.73
	JWS	L120	A108	TOWER TWO FILE. COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP, PER REQUEST OF ADJUSTER FOR FLIPPINS TRENCHING, RE: OUTCOME OF MOTION FOR SUMMARY	0.10	17.50
				JUDGEMENT, IMPLICATIONS OF THE SAME.	0.10	17.50
11/30/2017	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM LORALEE THATCHER RE: TENDER RESPONSE.	0.05	8.75
01/25/2018		L430 L190		REVIEW/ANALYZE EXECUTED ORDER FROM COUNSEL FOR HOA RE: MOTION FOR CLARIFICATION.	0.05	8.75
	FUD	F190	Alui	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR VICTAULIC RE: DISCUSSION OF WHETHER PLAINTIFF IS GOING TO TRY AND CORRECT THE PROBLEMS WITH THE ORIGINAL CHAPTER 40 NOTICE (TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	8.75
02/07/2018	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE, NOTES AND MINUTE ORDERS FROM COURT TO ASSIST WITH PREPRATION OF SUPPLEMENTAL STATUS REPORT.	0.40	70.00
	JWS	L120	A103	TIME TO BE SPLIT WITH TOWER 2 CASE. DRAFT/REVISE (BEGIN) SUPPLEMENTAL STATUS REPORT TO CARRIER RE: UPDATE AS TO CASE ACTIVITY, HEARINGS, AND MOTION WORK AND	0.40	70.00
02/15/2018	JWS	L120	A104	COURT'S RULING AND IMPLICATIONS OF SAME. REVIEW/ANALYZE AND UPDATE SUPPLEMENTAL STATUS REPORT RE: CASE ACTIVITY/MOTION	0.30	52.50
				PRACTICE. 0009	0.10 AA3185	17.50

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

	11440	1.400	4.400		Hours	
	JWS	L120	A103	DRAFT/REVISE E-MAIL CORRESPONDENCE TO CARRIER, MEET AND CONFER RE: SUPPLEMENTAL REPORT/NEXT STATUS CHECK HEARING.	0.05	8.75
02/22/2018	JWS	L120	A104	REVIEW/ANALYZE (BEGIN) CORRESPONDENCE/NOTES TO ASSIST WITH PREPRATION FOR SPECIAL MASTER HEARING.	0.10	17.50
	PCB	L230	A109	APPEAR FOR/ATTEND SPECIAL MASTER HEARING TO ADDRESS STATUS OF CHAPTER 40 IN LIGHT OF STAY BEING LIFTED ON MARCH 15, 2018 (NO TRAVEL TIME		
	JWS	L230	A109	INCLUDED IN THIS ENTRY SINCE ATTENDANCE WAS BY TELEPHONE; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN CASE DEALING WITH TOWER II). APPEAR FOR/ATTEND (TELEPHONICALLY) SPECIAL MASTER HEARING ALONG WITH PETER BROWN,	0.15	26.25
				DISCUSSION REGARDING CASE ACTIVITY/STRATEGY MOVING FORWARD. TIME TO BE SPLIT WITH TOWER II CASE.	0.15	26.25
02/23/2018	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXCESS CARRIER, MEET AND CONFER RE: CASE ACTIVITY IN PREPRATION OF RESPONDING TO THE SAME.	0.05	0.75
	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE/NOTES RE: RECENT ACTIVITY TO ASSIST WITH DRAFTING		8.75
	JWS	L120	A103	RESPONSE TO EXCESS CARRIER. DRAFT/REVISE CORRESPONDENCE/SUMMARY OF RECENT ACTIVITY/MOTION WORK PURSUANT TO	0.10	17.50
				REQUEST OF EXCESS CARRIER.	0.05	8.75
02/28/2018	PCB	L190	A108	COMMUNICATE (OTHER EXTERNAL) WITH DANIEL BUCHER (ENDURANCE - EXCESS CARRIER) RE: DISCUSSION OF OVERALL STATUS OF THE CASE AND WHAT IS THE LIKELY RESPONSE TO PLAINTIFF'S ANTICIPATED NEW CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.30	52.50
				For Current Services Rendered	17.95	3,125.25
				Recapitulation		
<u>Timekeepe</u> Peter C. Br				<u>Title</u> <u>Hours</u> PARTNER 6.00	<u>Rate</u> \$175.00	<u>Total</u> \$1,050.00
Jeffrey W. Saab Jennifer Vela			ASSOCIATE 11.75 PARALEGAL 0.20	175.00 95.00	2,056.25 19.00	

Expenses

09/11/2017 L100 E112 ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT OWNERS ASSOCIATION'S MOTION TO AMEND PLEADINGS

CHUBB INSURANCE

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			AND THE ADOL TIME FOR OFFICEOU	4.75	
00/12/2017	1 100	E440	AND ENLARGE TIME FOR SERVICES)	1.75	
09/12/2017	L100	EIIZ	COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012091 FILING - EIGHTH JUDICIAL DISTRICT		
			COURT)	2.88	
09/25/2017	L100	E112	ODYSSEY (NOTICE OF ENTRY OF ORDER AS TO	2.00	
00/20/2011			PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER'S,		
			PANORAMA TOWERS I, LLC'S, PANORAMA TOWERS I MEXX,		
			LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR		
			SUMMARY JUDGMENT ON		
			DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER		
			CONDOMINIUM UNIT OWNERS' ASSOCIATION'S		
			COUNTER-CLAIM AND PLAINTIFFS/COUNTER/DEFENDANTS,		
			LAURENT HALLIER'S, PANORAMA TOWERS I, LLC'S		
			PANORAMA TOWERS I MEXX, LLC'S AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR PARTIAL SUMMARY		
			JUDGMENT ON THEIR THIRD CHILD CLAIM FOR RELIEF IN		
			THEIR COMPLAINT FOR DECLARATORY RELIEF)	1.75	
09/30/2017	L100	E101	REPRODUCTION COSTS FOR SEPTEMBER 2017 (13 PAGES	1.70	
			AT .08/PAGE)	0.52	
10/01/2017	L100	E112	COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA		
			(INVOICE #37012255 FILING - EIGHTH JUDICIAL DISTRICT		
			COURT / SERVICES PROVIDED ON 09/27/2017)(AMOUNT		
			INCLUDES ADV CK OF \$86.00)	45.88	
10/01/2017	L100	E121	ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC	74.05	
10/19/2017	L100	E124	LOS ANGELES (INVOICE NO. 0004147084-260) PARKING (6714) JEFFREY W. SAAB (HEARING)	74.25 4.50	
10/19/2017	L100		ODYSSEY (LAURENT HALLIER, PANORAMA TOWERS I, LLC,	4.50	
10/21/2011	L100	L112	PANORAMA TOWERS MEZZ, LLC AND M.J. DEAN		
			CONSTRUCTION, INC.'S OPPOSITION TO PANORAMA UNIT		
			OWNERS ASSOCIATION'S MOTION FOR CLARIFICATION OF		
			THIS COURT'S SEPTEMBER 15, 2017 ORDER)	1.75	
10/31/2017	L100	E101	REPRODUCTION COSTS FOR OCTOBER 2017 (536 PAGES AT		
44/04/0047	1.400	E440	.08/PAGE)	21.44	
11/01/2017	L100	E112	COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37012611 FILING - EIGHTH JUDICIAL DISTRICT		
			COURT / SERVICES PROVIDED ON 10/30/2017)	2.88	
11/01/2017	L100	F112	ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES	2.00	
			NEVADA (INVOICE #37012611 DELIVERY/PICK UP - LYNCH		
			HOPPER, LAS VEGAS NV / SERVICES PROVIDED ON		
			10/31/2017)	16.67	
11/01/2017	L100	E121	ARBITRATORS/MEDIATORS (366) JAMS ENDISPUTE, INC		
4.4.00.400.4=		= 4.40	LOS ANGELES (INVOICE NO. 0004176986-260)	24.75	
11/02/2017	L100	E112	COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA		
			(INVOICE #37012825 FILING - EIGHTH JUDICIAL DISTRICT COURT)	2.88	
11/07/2017	L100	F112	ODYSSEY (STIPULATION AND ORDER TO CONTINUE	2.00	
11/01/2017	2100	L112	HEARING ON PANORAMA TOWERS CONDOMINIUM UNIT		
			OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION)	1.75	į
11/08/2017	L100	E112	ODYSSEY (NOTICE OF ENTRY OF STIPULATION AND ORDER		
			TO CONTINUE HEARING ON PANORAMA TOWERS		
			CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION		
44/20/2047	1.400	E404	FOR CLARIFICATION)	1.75	
11/30/2017	L100	⊏ 101	REPRODUCTION COSTS FOR NOVEMBER 2017 (266 PAGES	AA3187	
			0011	1 1 10 1 0 1	

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				AT .08/PAGE)					10.64
12/01/2	2017	L100	E121	ARBITRATORS				INC	100 75
LOS ANGELES (INVOICE NO. 0004209264-260) 02/01/2018 L100 E124 ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37013861 PICK UP ORDER FOR PANORAMA CASE - LYNCH HOPPER & SMITH, LLP, LAS								123.75	
				VEGAS NV / SE					25.29
				Total Expenses					365.08
				Total Current W	ork/				3,490.33
				Previous Baland	ce				-\$5,568.19
				Credit Balance					-\$2,077.86
					Split Billin	g Summary			
_					•	<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Total</u>
	3 INSURANCE Pallas AGL Cla					3,125.25 3,125.25	365.08 365.03	0.00 0.00	3,490.33 3,490.28
ESIS L	alias AGL Cia	11115 (2) -	ганога	ilia Towel II		6,250.50	730.11	0.00	6,980.61
						0,230.30	730.11	0.00	0,960.01
					Task Cod	le Summary			
1.400	0405 4005	001451	T DEV	TI ODNIENIT AND	4 D 1 41 1 1 0	TD 4 TION		Fees	<u>Expenses</u>
L100 L120	ANALYSIS/S			ELOPMENT AND	ADMINIS	TRATION		0.00 866.25	365.08 0.00
L130	EXPERTS/C							70.00	0.00
L190	OTHER CAS	SE ASSE	SSMEN	IT, DEVELOPME	NT & ADN	MINISTRATION	١	61.25	0.00
L100	CASE ASSE	SSMEN	T, DEVE	ELOPMENT AND	ADMINIS	TRATION		997.50	365.08
L210	PLEADINGS	;						297.50	0.00
L230	COURT MAN			ERENCES				463.75	0.00
L240 L250	DISPOSITIV	_		S AND SUBMISS	SIONS			428.75 656.25	0.00 0.00
					DIONS				
L200	PRE-TRIAL	PLEADII	NGS AN	D MOTIONS				1,846.25	0.00
L320	DOCUMENT							19.00	0.00
							175.00	0.00	
L350 DISCOVERY MOTIONS 78.75							$\frac{0.00}{0.00}$		
L300	DISCOVERY	ſ						272.75	0.00
L430	WRITTEN M	OTIONS	AND S	UBMISSIONS				8.75	0.00
L400	TRIAL PREF	PARATIC	N AND	TRIAL				8.75	0.00

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

TAX ID # 33-0747275

ESIS Dallas AGL Claims P.O. Box 5127

Scranton, PA 18505

USA

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II Page: 1 March 31, 2018

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Fees

				Hours	
01/25/2018	JWS L43		REVIEW/ANALYZE EXECUTED ORDER FROM COUNSEL FOR HOA RE: MOTION FOR CLARIFICATION. (TIME SPLIT WITH COMPANION FILE) COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR VICTAULIC RE: DISCUSSION OF WHETHER PLAINTIFF IS GOING TO TRY AND CORRECT THE PROBLEMS WITH THE ORIGINAL CHAPTER 40 NOTICE (TIME SPLIT WITH OTHER FILE	0.05	8.75
			IN SAME CASE - TOWER II).	0.05	8.75
02/07/2018	JWS L12		REVIEW/ANALYZE CORRESPONDENCE, NOTES AND MINUTE ORDERS FROM COURT TO ASSIST WITH PREPRATION OF SUPPLEMENTAL STATUS REPORT. TIME TO BE SPLIT WITH TOWER 2 CASE. DRAFT/REVISE (BEGIN) SUPPLEMENTAL STATUS REPORT TO	0.40	70.00
			CARRIER RE:		
				0.30	52.50
02/15/2018	JWS L12	20 A104	REVIEW/ANALYZE AND UPDATE SUPPLEMENTAL STATUS REPORT RE:	0.10	17.50
	JWS L12	20 A103	DRAFT/REVISE E-MAIL CORRESPONDENCE TO CARRIER,	0.10	17.00
			(TIME SPLIT WITH COMPANION FILE)	0.05	8.75
02/22/2018	JWS L12	20 A104	REVIEW/ANALYZE (BEGIN) CORRESPONDENCE/NOTES TO ASSIST WITH PREPRATION FOR SPECIAL MASTER HEARING.	0.10	17.50
	PCB L23	30 A109	APPEAR FOR/ATTEND SPECIAL MASTER HEARING TO ADDRESS STATUS OF CHAPTER 40 IN LIGHT OF STAY BEING LIFTED ON MARCH 15, 2018 (NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE ATTENDANCE WAS BY TELEPHONE; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.10	17.50
	JWS L23	30 A109	CASE DEALING WITH TOWER II). APPEAR FOR/ATTEND (TELEPHONICALLY) SPECIAL MASTER HEARING ALONG WITH PETER BROWN, DISCUSSION REGARDING CASE ACTIVITY/STRATEGY MOVING FORWARD.	0.15	26.25
			TIME TO BE SPLIT WITH TOWER II CASE.	0.15	26.25

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

02/23/2018	JWS	L120	A104	REVIEW/ANALYZ	ZE CORRESPON	DENCE FROM	EXCESS		Hours	
			4404	CARRIER, WITH COMPANIO			(TIME SPLIT		0.05	8.75
				(TIME DRAFT/REVISE O	SPLIT WITH CO	MPANION FILE		I	0.10	17.50
					TIVITY/MOTION WORK PURSUANT TO REQUEST OF EXCESS RRIER. (TIME SPLIT WITH COMPANION FILE) 0.05 8.7					8.75
02/28/2018	PCB	L190	A108	COMMUNICATE (ENDURANCE - E			NIEL BUCHER			
									0.30	52.50
				For Current Service	ces Rendered				1.85	323.75
Timeke	opor			-	Recapitulat Title	ion	Hours	Rate	т	otal
Peter (C. Brown			Ī	PARTNER		0.50	\$175.00	\$87	7.50
Jeffrey	W. Saab)		,	ASSOCIATE		1.35	175.00	236	3.25
					Expenses	<u>3</u>				
02/01/2018		L100	E124	ATTORNEY SERV (INVOICE #37013 LYNCH HOPPER	861 PICK UP OF & SMITH, LLP, L	RDER FOR PAN	IORAMA CASE			05.00
				PROVIDED ON 0 Total Expenses	1/25/2018)					25.28 25.28
				Total Current Wor	·k					349.03
					N.					
				Previous Balance						\$7,280.06
				Balance Due						\$7,629.09
		_			Past Due Amo					
		<u>0</u> 349	<u>-30</u>).03	<u>31-60</u> 0.00	<u>61-90</u> 3,141.25	<u>91-120</u> 0.00	<u>121-180</u> 0.00	4,13	1 <u>81+</u> 8.81	
					Split Billing Sur	nmary				
CHUBB INS	IDANCE	Donoror	ma Tay	uor l	-	<u>Fees</u> 323.75	Expenses 25.20	Advand		<u>Total</u>
ESIS Dallas	_			-		323.75 323.75	25.29 25.28		.00 .00	349.04 349.03
	$\overline{647.50}$ $\overline{50.57}$ $\overline{0.00}$ $\overline{698.07}$									
	Task Code Summary									
L100 CAS	<u>Fees</u> <u>Expens</u>								Expenses 25.28	
L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION								0.00	20.20	

ESIS Dallas AGL Claims

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

		<u>Fees</u>	<u>Expenses</u>
L120	ANALYSIS/STRATEGY	201.25	0.00
L190	OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION	61.25	0.00
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION	262.50	25.28
L230	COURT MANDATED CONFERENCES	52.50	0.00
L200	PRE-TRIAL PLEADINGS AND MOTIONS	52.50	0.00
L430	WRITTEN MOTIONS AND SUBMISSIONS	8.75	0.00
L400	TRIAL PREPARATION AND TRIAL	8.75	0.00

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

TAX ID # 33-0747275

CHUBB INSURANCE 9200 Oakdale Avenue, 8th Floor, Chatsworth, CA 91311, USA Page: 1
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Attn: Jeff Ganzer

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

<u>Fees</u>

						
03/02/2018	РСВ	L190	A104	REVIEW/ANALYZE EMAIL FROM DANIEL BUCHER (SOMPO - 2ND LAYER OF EXCESS)	Hours	
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.20	35.00
03/06/2018	JWS	L160	A104	REVIEW/ANALYZE E-MAIL CORRESPONDENCE FROM LUCY MENDEZ, MEET AND CONFER RE:	0.05	8.75
03/08/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF NEXT WEEK'S COURT HEARING, THE LIFTING OF THE STAY ON THE CASE, THE ANTICIPATED REVISED CHAPTER 40 NOTICE, AND THE ANTICIPATED ADDITIONAL MOTION PRACTICE THAT WILL ARISE FROM SAME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.10	17.50
03/09/2018	PCB	L250	A104	REVIEW/ANALYZE PROPOSED STIPULATION AND ORDER REGARDING THE UPCOMING STATUS CHECK AND MAKE PROPOSED REVISIONS TO SAME REGARDING WHEN THE NEW STATUS CHECK COULD BE SCHEDULED AND REQUIREMENT THAT THE REVISED CHAPTER 40 NOTICE MUST BE PROVIDED BEFORE THE NEW STATUS CHECK DATE		
	JWS	L230	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL RE: UPCOMING STATUS CHECK/CONTINUANCE TO EVALUATE IMPACT ON HOA'S FORTHCOMING CHAPTER 40 CORRESPONDENCE.	0.10	17.50 8.75
03/14/2018	JWS	L230	A104	REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR HOA, MEET AND CONFER RE: MARCH 15, 2017 STATUS CHECK HEARING.	0.05	8.75
	PCB	L230	A101	PLAN AND PREPARE FOR TOMORROW'S STATUS CHECK RE: GOING OVER HISTORY OF THE CHAPTER 40 NOTICE FIGHT	A A 2102	0.75
					/\ /\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	

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				AND OUTLINE DOCITIONS TO TAKE AT TOMORROWIS LIE ARING	Hours	
				AND OUTLINE POSITIONS TO TAKE AT TOMORROW'S HEARING DEPENDING ON WHAT POSITION IS TAKEN BY COUNSEL FOR THE HOA (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.15	26.25
03/15/2018	PCB	L230	A109	APPEAR FOR/ATTEND COURT STATUS HEARING (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	1.25	218.75
03/18/2018	PCB	L120	A103	DRAFT/REVISE CASE UPDATE FOLLOWING RECENT COURT STATUS HARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.10	17.50
04/05/2018	CW	L320	A104	REVIEW/ANALYZE DEFENDANT, PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATIONS' AMENDED NOTICE OF CLAIMS PURSUANT TO NRS 40.645 RE: LIMITED SCOPE OF RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER EXTERIOR WALL INSULATION AND A SEWER PROBLEM IN PREPARATION TO PROVIDE TO ATTORNEY FOR		
	JWS	L120	A104	ANALYSIS. REVIEW/ANALYZE (BEGIN) SUPPLEMENTAL CHAPTER 40 PACKET AND REPORTS TO ASSIST WITH EVALUATION OF	0.10	9.50
	JWS	L120	A108	SAME. SPLIT TIME WITH TOWER TWO CASE. COMMUNICATE (OTHER EXTERNAL) WITH EXPERT,	0.20	35.00
					0.10	17.50
04/11/2018		L230 L230		REVIEW/ANALYZE CORRESPONDENCE/NOTES IN PREPARATION OF MEET AND CONFER WITH OPPOSING COUNSEL RE: UPCOMING STATUS CHECK HEARING. COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL	0.05	8.75
				FOR HOA X 2, FRANCIS LYNCH MEET AND CONFER RE: UPCOMING HEARING/SCOPE AND FURTHER CASE HANDLING. SPLIT TIME WITH TOWER II CASE.	0.15	26.25
	JWS	L230	A105	COMMUNICATE (IN FIRM) X 2 WITH PARTNER, RE: MEET AND CONFER WITH OPPOSING COUNSEL,	0.10	17.50
	JWS	L230	A101	PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERT MKA	0.10	17.50
	JWS	L340	A108	COMMUNICATE (OTHER EXTERNAL) INITIAL CALL WITH ASHLEY ALLARD WITH MKA RE:	0.65	113.75
	JWS	L340	A104	REVIEW/ANALYZE AND OUTLINE BACK-UP DOCUMENTS FROM ASHLEY ALLARD WITH MKA RE:	0.10	17.50
	JWS	L340	A109	PLIT TIME WITH TOWER TWO CASE. APPEAR FOR/ATTEND CONFERENCE CALL WITH MKA EXPERT, ASHLEY ALLARD	0.15	26.25
	JWS	L340	A103	DRAFT/REVISE (BEGIN)M SUMMARY OF MEET AND CONFER	0.20	35.00
					AA3193	

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					Hours	
	DOD	1.400	A 4 0 7	WITH MKA EXPERT, ASHLEY ALLARD	0.10	17.50
	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE NEW CHAPTER 40 NOTICE AND ISSUES REGARDING SAME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH	0.40	47.50
	PCB	L230	A101	TOWER 2). PLAN AND PREPARE FOR TOMORROW'S STATUS HEARING RE: COMPARE ORIGINAL CHAPTER 40 NOTICE TO NEW CHAPTER 40 NOTICE, MAKE OUTLINE OF ARGUMENTS TO USE WITH REGARD TO ISSUES ARISING FROM THE NEW CHAPTER 40 NOTICE, AND IDENTIFY PORTIONS OF DOCUMENTS TO USE DURING THE HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2).	0.10	17.50 61.25
0.4.14.0.1004.0	DOD	1.000	A 4 0 0	,	0.55	01.23
04/12/2018	PCB	L230	A109	APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2).	0.75	131.25
04/26/2018	JWS	L120	A104	REVIEW/ANALYZE CORRESPONENCE, NOTES AND COURT WEBSITE RE: MINUTES FORM APRIL 12, HEARING TO ASSIST		
	IVVC	1 120	A 102	WITH PROPOSED ORDER.	0.05	8.75
	3442	L120	A 103	DRAFT/REVISE (BEGIN) PROPOSED ORDER R: SCOPE OF STAY.	0.05	8.75
04/30/2018	JWS	L320	A101	PLAN AND PREPARE (CONTINUE) ORDER STEMMING FROM APRIL 12, 2018 HEARING, IN ORDER TO ENSURE LANGUAGE CONTAINED THEREIN IS CONSISTENT WITH TRANSCRIPT FROM HEARING. SPLIT TIME WITH TOWER II CASE.	0.10	17.50
05/01/2018	PCB	L410	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR SOMPO (EXCESS CARRIER) RE: (AS PER CARRIER		
				DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2).	0.20	35.00
05/17/2018	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM ADJUSTER RE:	0.05	8.75
05/24/2018	PCB	L250	A104	REVIEW/ANALYZE TRANSCRIPT FROM MOST RECENT HEARINGS AND DRAFT PROPOSED ORDER BASED ON THE TRANSCRIPT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH		
	JWS	L120	A103	OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE CORRESPONDENCE TO ADJUSTER FOR FLIPPINS TRENCHING, MEET AND CONFER RE: CASE ACTIVITY, COURT'S RULING FROM LAST HEARING. SPLIT TIME	0.35	61.25
				WITH TOWER II FILE.	0.10	17.50
				For Current Services Rendered	6.05	1,050.75

CHUBB INSURANCE

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

Po Je	mekeeper eter C. Brown effrey W. Saab rystal Williams			Title PARTNER ASSOCIATE PARALEGAL		Hours 3.65 2.30 0.10	<u>Rate</u> \$175.00 175.00 95.00	Total \$638.75 402.50 9.50
				Expe	<u>nses</u>			
02/01/2	018	L100	E112	ODYSSEY (ORDER DENYING CONDOMINIUM UNIT OWNER	RS' ASSOCIATIO	N'S MOTION FO	R	
04/12/2	018	L100	E109	CLARIFICATION OF THIS CO LOCAL TRAVEL (134) PETER				1.75
05/01/2	018	L100	E123	WITH 1287.558) OTHER PROFESSIONALS (39)		IEPPERS &		2.25
05/01/2	018	L100	E123	ASSOCIATES, INC. (INVOICE OTHER PROFESSIONALS (39)	94) MADSEN, KN	NEPPERS &		945.25
05/01/2	018	L100	E123	ASSOCIATES, INC. (INVOICE OTHER PROFESSIONALS (39)	94) MADSEN, KN	NEPPERS &		945.25
05/01/2	ASSOCIATES, INC. (INVOICE NO.: 1128418) 05/01/2018 L100 E123 OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &							515.15
				ASSOCIATES, INC. (INVOICE Total Expenses	NO.: 1139009)			$\frac{568.00}{2,977.65}$
				Total Current Work				4,028.40
	Previous Balance							
								-\$2,077.86
				Balance Due				<u>\$1,950.54</u>
	INSURANCE allas AGL Clair			_	Summary Fees 1,050.75 1,050.75 2,101.50	Expenses 2,977.65 2,977.65 5,955.30	Advances 0.00 0.00 0.00	Total 4,028.40 4,028.40 8,056.80
				Task Code	Summary			
L100 L120 L160 L190 L100	L100 CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION 0.00 L120 ANALYSIS/STRATEGY 113.75 L160 SETTLEMENT/NON-BINDING ADR 8.75 L190 OTHER CASE ASSESSMENT, DEVELOPMENT & ADMINISTRATION 70.00							
L230 L250	COURT MAN			RENCES S AND SUBMISSIONS			621.25 78.75	0.00 0.00
L200	PRE-TRIAL P						$\frac{70.73}{700.00}$	$\frac{0.00}{0.00}$
L320 L340	DOCUMENT EXPERT DIS						27.00 96.25	0.00 0.00
L300	DISCOVERY						123.25	0.00

Recapitulation

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PANORAMA TOWER I ~~~SEE NOTES~~~

 L410
 FACT WITNESSES
 Expenses

 L400
 TRIAL PREPARATION AND TRIAL
 35.00
 0.00

0020 AA3196

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>

						
03/02/2018	PCB	L190	A104	REVIEW/ANALYZE EMAIL FROM DANIEL BUCHER (SOMPO - 2ND LAYER OF EXCESS)	Hours	
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.20	35.00
03/06/2018	JWS	L160	A104	REVIEW/ANALYZE E-MAIL CORRESPONDENCE FROM LUCY MENDEZ,	0.05	8.75
03/08/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF NEXT WEEK'S COURT HEARING, THE LIFTING OF THE STAY ON THE CASE, THE ANTICIPATED REVISED CHAPTER 40 NOTICE, AND THE ANTICIPATED ADDITIONAL MOTION PRACTICE THAT WILL ARISE FROM SAME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.10	17.50
03/09/2018	PCB	L250	A104	REVIEW/ANALYZE PROPOSED STIPULATION AND ORDER REGARDING THE UPCOMING STATUS CHECK AND MAKE PROPOSED REVISIONS TO SAME REGARDING WHEN THE NEW STATUS CHECK COULD BE SCHEDULED AND REQUIREMENT THAT THE REVISED CHAPTER 40 NOTICE MUST BE PROVIDED BEFORE THE NEW STATUS CHECK DATE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.10	17.50
	JWS	L230	A104	OTHER FILE IN SAME CASE DEALING WITH TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL RE: UPCOMING STATUS CHECK/CONTINUANCE TO EVALUATE IMPACT ON HOA'S FORTHCOMING CHAPTER 40 CORRESPONDENCE.	0.10 0.05	17.50 8.75
03/14/2018	JWS	L230	A104	REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL 0021	AA3197	

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				FOR HOA, MEET AND CONFER RE: MARCH 15, 2017	Hours	
	PCB	L230	A101	STATUS CHECK HEARING. PLAN AND PREPARE FOR TOMORROW'S STATUS CHECK RE: GOING OVER HISTORY OF THE CHAPTER 40 NOTICE FIGHT AND OUTLINE POSITIONS TO TAKE AT TOMORROW'S HEARING DEPENDING ON WHAT POSITION IS TAKEN BY COUNSEL FOR THE HOA (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.05 0.15	8.75 26.25
03/15/2018	PCB	L230	A109	APPEAR FOR/ATTEND COURT STATUS HEARING (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	1.25	218.75
03/18/2018	PCB	L120	A103	DRAFT/REVISE CASE UPDATE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.10	17.50
04/05/2018	CW	L320	A104	REVIEW/ANALYZE DEFENDANT, PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATIONS' AMENDED NOTICE OF CLAIMS PURSUANT TO NRS 40.645 RE: LIMITED SCOPE OF RESIDENTIAL TOWER WINDOWS, RESIDENTIAL TOWER EXTERIOR WALL INSULATION AND A SEWER PROBLEM IN PREPARATION TO PROVIDE TO		
	JWS	L120	A104	ATTORNEY FOR ANALYSIS. REVIEW/ANALYZE (BEGIN) SUPPLEMENTAL CHAPTER 40 PACKET AND REPORTS TO ASSIST WITH EVALUATION OF SAME. SPLIT TIME WITH TOWER TWO CASE.	0.10	9.50 35.00
	JWS	L120	A108	COMMUNICATE (OTHER EXTERNAL) WITH EXPERT,	0.10	17.50
04/11/2018		L230 L230		REVIEW/ANALYZE CORRESPONDENCE/NOTES IN PREPARATION OF MEET AND CONFER WITH OPPOSING COUNSEL RE: UPCOMING STATUS CHECK HEARING. COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH	0.05	8.75
	JWS	L230	A105	COUNSEL FOR HOA X 2, FRANCIS LYNCH MEET AND CONFER RE: UPCOMING HEARING/SCOPE AND FURTHER CASE HANDLING. SPLIT TIME WITH TOWER II CASE. COMMUNICATE (IN FIRM) X 2 WITH PARTNER, RE: MEET	0.15	26.25
	JWS	L230	A101	AND CONFER WITH OPPOSING COUNSEL, AND PREPARATION FOR EXPERT MEETING. PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERT MKA	0.10	17.50
	JWS	L340	A108	COMMUNICATE (OTHER EXTERNAL) INITIAL CALL WITH	0.65	113.75
				ASHLEY ALLARD WITH MKA RE: 0022	0.10 AA3198	17.50

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04/12/2018

04/26/2018

04/30/2018

05/01/2018

JWS	L340	A104	REVIEW/ANALYZE AND OUTLINE BACK-UP DOCUMENTS FROM ASHLEY ALLARD WITH MKA RE:	Hours	
JWS	L340	A109	SPLIT TIME WITH TOWER TWO CASE. APPEAR FOR/ATTEND CONFERENCE CALL WITH MKA EXPERT, ASHLEY ALLARD	0.15	26.25
JWS	L340	A103	DRAFT/REVISE (BEGIN)M SUMMARY OF MEET AND CONFER WITH MKA EXPERT,	0.20	35.00
PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR HOA RE: DISCUSSION OF THE NEW CHAPTER 40 NOTICE AND ISSUES REGARDING SAME (AS	0.10	17.50
PCB	L230	A101	PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2). PLAN AND PREPARE FOR TOMORROW'S STATUS HEARING RE: COMPARE ORIGINAL CHAPTER 40 NOTICE TO NEW CHAPTER 40 NOTICE, MAKE OUTLINE OF ARGUMENTS TO USE WITH REGARD TO ISSUES ARISING FROM THE NEW CHAPTER 40 NOTICE, AND IDENTIFY PORTIONS OF DOCUMENTS TO USE DURING THE HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER	0.10	17.50
PCB	L230	A109	2). APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2).	0.35 0.75	61.25 131.25
JWS	L120	A104	REVIEW/ANALYZE CORRESPONENCE, NOTES AND COURT WEBSITE RE: MINUTES FORM APRIL 12, HEARING	0.05	0.75
JWS	L120	A103	TO ASSIST WITH PROPOSED ORDER. DRAFT/REVISE (BEGIN) PROPOSED ORDER R: SCOPE OF STAY.	0.05 0.05	8.75 8.75
JWS	L320	A101	PLAN AND PREPARE (CONTINUE) ORDER STEMMING FROM APRIL 12, 2018 HEARING, IN ORDER TO ENSURE LANGUAGE CONTAINED THEREIN IS CONSISTENT WITH TRANSCRIPT FROM HEARING. SPLIT TIME WITH TOWER II CASE.	0.10	17.50
PCB	L410	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR SOMPO (EXCESS CARRIER) RE:		
			(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER 2). $0023 \label{eq:0023}$	0.20 AA3199	35.00

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					Hours	
05/17/2018	JWS	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM ADJUSTER RE:	0.05	8.75
05/24/2018		L250 L120		REVIEW/ANALYZE TRANSCRIPT FROM MOST RECENT HEARINGS AND DRAFT PROPOSED ORDER BASED ON THE TRANSCRIPT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE CORRESPONDENCE TO ADJUSTER FOR FLIPPINS TRENCHING, MEET AND CONFER RE: CASE ACTIVITY, COURT'S RULING FROM LAST HEARING. SPLIT	0.35	61.25
06/01/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR ONE OF THE SUBCONTRACTORS RE: UPDATE ON STATUS OF STAY ON DISCOVERY, THE HOA'S NEW CHAPTER 40 NOTICE, THE COURT'S RULING ON TIMING FOR MOTION PRACTICE, WHAT THE COURT'S ORDER PRECLUDES THE HOA FROM DOING WITH REGARD TO THE CHAPTER 40 NOTICE, AND ADDITIONAL DISCUSSION AS TO WHETHER COUNSEL NEEDS TO DO ANYTHING ON BEHALF OF CLIENT AT THIS TIME (AS PER DIRECTIVE FROM THE CARRIER, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	0.10	17.50 17.50
06/05/2018	JWS	L230	A104	REVIEW/ANALYZE AND EXECUTE NOTICE OF ENTRY OF ORDER STEMMING FROM LAST ROUND OF MOTION WORK WITH RESPECT TO THE HOA'S CHAPTER 40 NOTICE/CLIENTS' OBJECTION TO SAME.	0.05	8.75
06/13/2018	JWS	L340	A108	COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MICHELLE ROBBINS X 2,	0.15	26.25
06/18/2018	JWS	L340	A101	PLAN AND PREPARE FOR (BEGIN) MEET AND CONFER WITH MKA'S SHELLY ROBBINS,	0.05	04.05
	PCB	L130	A104	REVIEW/ANALYZE THE HOA'S REVISED CHAPTER 40 NOTICE, COMPARE SAME TO ORIGINAL CHAPTER 40 NOTICE, IDENTIFY PORTIONS OF PLAINTIFF'S NEW EXPERT REPORT (ATTACHED TO THE NEW CHAPTER 40 NOTICE) (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE	0.35	61.25
	PCB	L130	A109	IN SAME CASE - TOWER II). APPEAR FOR/ATTEND CONFERENCE CALL WITH THE CLIENTS' EXPERT TEAM (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE 0024	0.30 AA3200	52.50

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	JWS	L340	A109	- TOWER II). APPEAR FOR/ATTEND CONFERENCE CALL WITH EXPERT, SHELLY ROBBINS, DISCUSSION RE:	Hours 0.35	61.25
				PER ADJUSTER REQUEST, TIME SPILT WITH TOWER II CASE.	0.35	61.25
07/06/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR THE EXCESS CARRIER (JAN DUFFALO) RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE		
				IN SAME CASE - TOWER II).	0.05	8.75
07/07/2018	JWS	L240	A101	PLAN AND PREPARE FOR (CONTINUE) DISPOSITIVE MOTIONS, RE: HEAD FLASHING. REVIEW OF PLANS/NOTICES AND CORRESPONDING REPORTS.	0.80	140.00
07/14/2018	JWS	L240	A101	PLAN AND PREPARE FOR (BEGIN) MOTION FOR SUMMARY JUDGEMENT REGARDING: UNTIMELY CHAPTER 40 CLAIMS, REVIEW OF INITIAL SUPPLEMENTAL NOTICES/REPORTS WITH BACK UP.	1.20	210.00
07/20/2018	JWS	L240	A101	PLAN AND PREPARE FOR MOTION FOR SUMMARY JUDGMENT RE: WINDOW CLAIMS, COMPARISON OF NOTICES, ORIGINAL CHAPTER 40 REPORTS, SUPPLEMENTAL AND BACK UP FOR SAME.	0.95	166.25
07/22/2018	JWS	L430	A101	PLAN AND PREPARE FOR MOTION FOR SUMMARY JUDGMENT RE: EIFS/CAVITY CLAIMS, REVIEW AND OUTLINE OF NOTICES/ORIGINAL AND SUPPLEMENTAL TO ASSIST WITH FORMULATION OF ARGUMENTS AS TO THE SAME.	1.20	210.00
07/23/2018	PCB	L120	A103	DRAFT/REVISE COMPREHENSIVE UPDATE TO CARRIERS RE:		
					0.40	70.00
07/24/2018	JWS	L240	A103	DRAFT/REVISE (BEGIN) MOTION FOR SUMMARY JUDGEMENT, AFFIDAVIT, FACTS, PROCEDURAL	3.10	. 3.00
	JWS	L240	A103	HISTORY/MOTION WORK TO DATE.11 PAGES. DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGEMENT, 10, STATEMENT OF UNDISPUTED FACTS WITH CITATIONS, AND ANALYSIS/COMPARISON OF	1.65	288.75
				ORIGINAL NOTICE VERSUS AMENDED 0025	AA3201	

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				NOTICE/CURATIVE EFFORTS AND/OR LACK THEREOF	Hours	
	JWS	L240	A103	WITH RESPECT TO WINDOW SILL FLASHING AND HEAD FLASHING CLAIMS. DRAFT/REVISE (CONTINUE)) MOTION FOR SUMMARY JUDGEMENT, ANALYSIS AND COMPARISON OF DEFECT REPORTS/NOTICES FOR INITIAL AND AMENDED	1.45	253.75
				EIFS/INSULATION CLAIMS. 4 PAGES.	0.60	105.00
07/29/2018	JWS	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT RE: REVISED CHAPTER 40 CLAIMS.	0.75	131.25
07/31/2018	PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S STATUS HEARING RE: CONTINUE TO GO OVER THE ISSUES THAT WILL NEED TO BE ADDRESSED NEXT WEEK, INCLUDING THE ANTICIPATED MOTIONS THAT STILL NEED TO BE HEARD (AS PER CARRIER DIRECTIVE,		
	JWS	L120	A103	TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGEMENT, SUPPLEMENTED UNDISPUTED STATEMENT OF FACTS, AND ARGUMENTS RE: INITIAL/SUPPLEMENTAL SEWER CLAIMS (AS PER CARRIER DIRECTIVE, SPLIT WITH OTHER FILE IN SAME	0.10	17.50
				CASE- TOWER II).	0.80	140.00
08/01/2018	PCB	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT ON THE HOA'S AMENDED CHAPTER 40 NOTICE RE: ADDITIONAL ARGUMENTS PERTAINING TO NEW, UNTIMELY DEFECTS, THE CONTINUED LACK OF SPECIFICITY WITH REGARD TO VARIOUS DEFECTS, AND THE HOA'S WEAK EXPLANATION AS TO WHY IT DID NOT PROVIDE NOTICE OF THE ALLEGED SEWER LINE DEFECT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.80	140.00
08/03/2018	LK	L320	A104	REVIEW/ANALYZE AND FINALIZE EXHIBITS TO MOTION FOR SUMMARY JUDGMENT RE: AMENDED CHAPTER 40 CLAIMS, RE: DECLARATIONS/AFFIDAVITS OF EXPERT AND ATTORNEY, CHAPTER 40 CORRESPONDENCE AND DEFECT LIST, IN PREPARATION FOR FILING OF MOTION		
	PCB	L240	A103	FOR SUMMARY JUDGMENT WITH COURT. DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT AS TO THE HOA'S AMENDED CHAPTER 40 NOTICE RE: CONTINUE WORK ON UNDISPUTED MATERIAL FACT SECTION TO MAKE SURE IT COVERS ALL ASPECTS OF THE AMENDED NOTICE THAT DID NOT RECTIFY THE PROBLEMS WITH THE ORIGINAL NOTICE, CONTINUE WORK ON SECTION DEALING WITH APPLICATION OF THE STATUTE TO THE AMENDED CHAPTER 40 NOTICE, CONTINUE WORK ON THE DECLARATIONS IN SUPPORT OF THE MOTION, AND CONTINUE WORK ON THE REQUESTED RELIEF (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.45 AA3202	42.75
				0026	-	

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	JWS	L240	A101	SAME CASE - TOWER II). PLAN AND PREPARE FOR (CONTINUE) MOTION FOR SUMMARY JUDGEMENT, RE: SUPPLEMENTAL ARGUMENTS BASED ON MEET AND CONFER WITH EXPERT RE: NEW ISSUES WHICH COULD HAVE BEEN RAISED AS A PART OF INITIAL INVESTIGATION/FACTUAL BACKGROUND FOR SAME. SPLIT TIME WITH TOWER	Hours 1.40	245.00
	JWS	L240	A103	TWO CASE. DRAFT/REVISE DECLARATION IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT, ATTORNEY AND ALSO FOR EXPERT, MICHELLE ROBBINS (AS PER CARRIER DIRECTIVE, SPLIT WITH OTHER FILE IN SAME CASE-	1.25	218.75
	LK	L320	A104	TOWER II). REVIEW/ANALYZE (CONTINUE) AND FINALIZE ADDITIONAL EXHIBITS TO MOTION FOR SUMMARY JUDGMENT, RE: DECLARATIONS OF ATTORNEY AND EXPERT MICHELLE ROBBINS, IN PREPARATION FOR FILING WITH COURT.	0.30	52.50 28.50
08/04/2018	PCB	L240	A103	DRAFT/REVISE EMAIL TO CARRIER AND COVERAGE COUNSEL RE: DISCUSSION OF THE MOTION FOR SUMMARY JUDGMENT THAT HAS BEEN FILED AND THE INTENDED IMPACT OF THE MOTION FOR SUMMARY JUDGMENT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	8.75
08/07/2018	PCB	L230	A101	PLAN AND PREPARE FOR TODAY'S STATUS HEARING RE: OUTLINE POSITIONS TO TAKE DURING THE HEARING SHOULD OPPOSING COUNSEL ATTEMPT TO ARGUE THAT THE STAY SHOULD BE LIFTED NOTWITHSTANDING THE MOTION FOR SUMMARY JUDGMENT THAT HAS BEEN FILED REGARDING THE AMENDED CHAPTER 40 NOTICE		
	PCB	L230	A109	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND STATUS CONFERENCE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; BOTH PCB AND JEFF SAAB PRE-APPROVED BY CARRIER TO ATTEND THE HEARING; NO TRAVEL TIME INCLUDED IN THIS ENTRY; LESS TIME BILLED BY PCB THAN JEFF SAAB SINCE PCB HAD TO ATTEND ANOTHER HEARING IN ANOTHER CASE	0.15	26.25
	РСВ	L230	A103	BEFORE THE HEARING IN THIS CASE WAS OVER). DRAFT/REVISE EMAIL TO ALL CARRIER CONTACTS AND TO COVERAGE COUNSEL RE:	0.35	61.25
	JWS	L230	A101	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR STATUS CHECK HEARING, RE: STAY OF CASE, MOTION FOR SUMMARY JUDGMENT. REVIEW OF MOTION, COURT'S LAST ORDER. TIME SPLIT	0.05	8.75
	JWS	L230	A109	WITH TOWER II CASE. APPEAR FOR/ATTEND STATUS CONFERENCE WITH 0027	0.20 AA3203	35.00

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				PETER BROWN, RE: CASE STATUS/STAY AND MOTION	Hours	
				FOR SUMMARY JUDGMENT. NO TRAVEL TIME IN ENTRY. TIME SPLIT WITH TOWER II CASE.	0.35	61.25
	JWS	L230	A109	APPEAR FOR/ATTEND POST HEARING MEET AND CONFER RE: UPCOMING SPECIAL MASTER HEARING.	0.10	17.50
08/29/2018	PCB	L240	A108	COMMUNICATE (OTHER EXTERNAL) WITH THE COURT AND WITH COUNSEL FOR THE HOA RE: DISCUSSION OF WHAT NEEDS TO BE FILED REGARDING THE HEARING OF THE MOTION FORM SUMMARY JUDGMENT GIVEN THE CONFUSION AS TO WHETHER THE HEARING OF THE MOTION FOR SUMMARY JUDGMENT IS GOING TO BE MOVED TO A NEW DATE AND WHEN BOTH THE OPPOSITION BRIEF AND THE REPLY BRIEF WILL BE FILED/SERVED.	$\frac{0.10}{23.50}$	17.50 4,044.50
				For Current Services Rendered	23.50	4,044.50
Timekeepe Peter C. Br Jeffrey W. Lexi Kim Crystal Wil	rown Saab			PARTNER 14.80 1 PARALEGAL 0.75		Total ,373.75 ,590.00 71.25 9.50
				<u>Expenses</u>		
02/01/2018		L100	E112	ODYSSEY (ORDER DENYING DEFENDANT PANORAMA TOWERS CONDOMINIUM UNIT OWNERS' ASSOCIATION'S MOTION FOR CLARIFICATION OF THIS COURTS SEPTEMBER		1.75
04/12/2018		L100	E109	5, 2017 ORDER) LOCAL TRAVEL (134) PETER C. BROWN (COURT PARKING		
04/12/2018		L100	E109	SPLIT WITH 1287.551) LOCAL TRAVEL (134) PETER C. BROWN (COURT PARKING		4.50
05/01/2018		L100	E123	SPLIT WITH 1287.558) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &		2.25
05/01/2018		L100	E123	ASSOCIATES, INC. (INVOICE NO.: 1126721) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &		945.25
05/01/2018		L100	E400	ASSOCIATES, INC. (INVOICE NO.: 1126722)		945.25
		L100	E123	OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &		
05/01/2018		L100		ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &		515.15
05/01/2018 06/01/2018			E123	ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (INVOICE NO.: 1139009) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37015769 PROPOSED ORDER - EIGHTH JUDICIAL		568.00
		L100	E123 E112	ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (INVOICE NO.: 1139009) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA		
06/01/2018 06/04/2018 06/05/2018		L100 L100 L100 L100	E123 E112 E112 E112	ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (INVOICE NO.: 1139009) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37015769 PROPOSED ORDER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/31/18) ODYSSEY (ORDER) ODYSSEY (NOTICE OF ENTRY OF ORDER)		568.00 2.87
06/01/2018 06/04/2018		L100 L100 L100	E123 E112 E112 E112	ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (INVOICE NO.: 1139009) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37015769 PROPOSED ORDER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/31/18) ODYSSEY (ORDER) ODYSSEY (NOTICE OF ENTRY OF ORDER) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS &		568.00 2.87 1.75 1.75
06/01/2018 06/04/2018 06/05/2018		L100 L100 L100 L100	E123 E112 E112 E112	ASSOCIATES, INC. (INVOICE NO.: 1128418) OTHER PROFESSIONALS (394) MADSEN, KNEPPERS & ASSOCIATES, INC. (INVOICE NO.: 1139009) COURT FEES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE #37015769 PROPOSED ORDER - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 5/31/18) ODYSSEY (ORDER) ODYSSEY (NOTICE OF ENTRY OF ORDER)		568.00 2.87 1.75

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		Total Current W	ork				7,395.27
Previous Balance							\$7,629.09
			<u>Payments</u>				
04/09/2	2018	PAYMENT REC	EIVED - THANK	YOU (ESIS CK	#FA78634036	I	
		STMT #10)					-47.61
04/10/2	2018	STMT #10)	EIVED - THANK	YOU (ESIS CK	.#FA/8034U5Z	I	-5,856.29
05/01/2	2018		EIVED - THANK	YOU (ESIS CK	#FA08110834	1	-660.14
		Total Payments					-6,564.04
		Balance Due					\$8,460.32
			Past Due Amou	ınts			
	<u>0-30</u>	<u>31-60</u>	61-90	91-120	121-180	<u>181+</u>	
	7,395.27	0.00	0.00	0.00	0.00	1,065.05	
			Split Billing Sum	mary			
			<u> </u>	ees E	xpenses_	<u>Advances</u>	<u>Total</u>
	B INSURANCE - Panorama To		4,04		3,346.28	0.00	7,390.78
ESIS L	Dallas AGL Claims (2) - Panora	ama Tower II	4,04		3,346.27	0.00	7,390.77
			8,08	9.00	6,692.55	0.00	14,781.55
			Task Code Sum	mary			
						<u>Fees</u>	Expenses
L100	CASE ASSESSMENT, DEV	ELOPMENT AND	ADMINISTRATIC	N		0.00	3350.77
L120 L130	ANALYSIS/STRATEGY EXPERTS/CONSULTANTS					341.25 113.75	0.00 0.00
L160	SETTLEMENT/NON-BINDIN	IG ADR				8.75	0.00
L190	OTHER CASE ASSESSME		NT & ADMINISTF	RATION		96.25	0.00
L100	CASE ASSESSMENT, DEV	ELOPMENT AND	ADMINISTRATIO	N		560.00	3,350.77
L230	COURT MANDATED CONF	ERENCES				840.00	0.00
L240	DISPOSITIVE MOTIONS	LINEINOLO				1977.50	0.00
L250	OTHER WRITTEN MOTION	IS AND SUBMISS	IONS			78.75	0.00
L200	PRE-TRIAL PLEADINGS AN	ND MOTIONS				2,896.25	0.00
L320	DOCUMENT PRODUCTION	1				98.25	0.00
L340	EXPERT DISCOVERY					245.00	0.00
L300	DISCOVERY					343.25	0.00
L410	FACT WITNESSES					35.00	0.00
L430	WRITTEN MOTIONS AND	SUBMISSIONS				210.00	0.00
L400	TRIAL PREPARATION AND	TRIAL				245.00	0.00

ESIS Dallas AGL Claims

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Account No: 1287-5581V Statement No: 12

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

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

0030 AA3206

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 9200 Oakdale Avenue, 8th Floor, Chatsworth, CA 91311, USA

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Attn: Jeff Ganzer

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

			<u>Fees</u>		
06/01/2018	PCB	L190 A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR ONE OF THE SUBCONTRACTORS RE: UPDATE ON STATUS OF STAY ON DISCOVERY, THE HOA'S NEW CHAPTER 40 NOTICE, THE COURT'S RULING ON TIMING FOR MOTION PRACTICE, WHAT THE COURT'S ORDER PRECLUDES THE HOA FROM DOING WITH REGARD TO THE CHAPTER 40 NOTICE, AND ADDITIONAL DISCUSSION AS TO WHETHER COUNSEL NEEDS TO DO ANYTHING ON BEHALF OF CLIENT AT THIS TIME (AS PER DIRECTIVE FROM THE CARRIER, TIME SPLIT WITH OTHER FILE IN SAME CASE DEALING WITH TOWER II).	Hours 0.10	17.50
06/05/2018	JWS	L230 A104	REVIEW/ANALYZE AND EXECUTE NOTICE OF ENTRY OF ORDER STEMMING FROM LAST ROUND OF MOTION WORK WITH RESPECT TO THE HOA'S CHAPTER 40 NOTICE/CLIENTS' OBJECTION TO SAME.	0.05	8.75
06/13/2018	JWS	L340 A108	COMMUNICATE (OTHER EXTERNAL) WITH EXPERT, MICHELLE ROBBINS X 2,	0.15	26.25
06/18/2018	JWS	L340 A101	PLAN AND PREPARE FOR (BEGIN) MEET AND CONFER WITH MKA'S SHELLY ROBBINS,	0.35	61.25
	PCB	L130 A104	REVIEW/ANALYZE THE HOA'S REVISED CHAPTER 40 NOTICE, COMPARE SAME TO ORIGINAL CHAPTER 40 NOTICE, IDENTIFY PORTIONS OF PLAINTIFF'S NEW EXPERT REPORT (ATTACHED TO THE NEW CHAPTER 40 NOTICE) (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.30	52.50
	PCB	L130 A109	APPEAR FOR/ATTEND CONFERENCE CALL WITH THE 0031	AA3207	

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

			CLIENTS' EXPERT TEAM (AS PER CARRIER	Hours	
	JWS L	L340 A109	DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND CONFERENCE CALL WITH EXPERT, SHELLY ROBBINS, DISCUSSION RE: PER ADJUSTER REQUEST, TIME SPILT WITH TOWER II CASE.	0.35	61.25 61.25
07/06/2018	PCB L	L190 A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR THE EXCESS CARRIER (JAN DUFFALO) RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE		
			IN SAME CASE - TOWER II).	0.05	8.75
07/07/2018	JWS L	L240 A101	PLAN AND PREPARE FOR (CONTINUE) DISPOSITIVE MOTIONS, RE: HEAD FLASHING. REVIEW OF PLANS/NOTICES AND CORRESPONDING REPORTS.	0.80	140.00
07/14/2018	JWS L	L240 A101	PLAN AND PREPARE FOR (BEGIN) MOTION FOR SUMMARY JUDGEMENT REGARDING: UNTIMELY CHAPTER 40 CLAIMS, REVIEW OF INITIAL SUPPLEMENTAL NOTICES/REPORTS WITH BACK UP.	1.20	210.00
07/20/2018	JWS L	L240 A101	PLAN AND PREPARE FOR MOTION FOR SUMMARY JUDGMENT RE: WINDOW CLAIMS, COMPARISON OF NOTICES, ORIGINAL CHAPTER 40 REPORTS, SUPPLEMENTAL AND BACK UP FOR SAME.	0.95	166.25
07/22/2018	JWS L	L430 A101	PLAN AND PREPARE FOR MOTION FOR SUMMARY JUDGMENT RE: EIFS/CAVITY CLAIMS, REVIEW AND OUTLINE OF NOTICES/ORIGINAL AND SUPPLEMENTAL TO ASSIST WITH FORMULATION OF ARGUMENTS AS TO THE SAME.	1.20	210.00
07/23/2018	PCB L	L120 A103	DRAFT/REVISE COMPREHENSIVE UPDATE TO CARRIERS RE:		
				0.40	70.00
07/24/2018	JWS L	L240 A103	DRAFT/REVISE (BEGIN) MOTION FOR SUMMARY JUDGEMENT, AFFIDAVIT, FACTS, PROCEDURAL		
	JWS L	L240 A103	HISTORY/MOTION WORK TO DATE.11 PAGES. DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY 0032	1.65 AA3208	288.75

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

					Hours	
	JWS	L240	A103	JUDGEMENT, 10, STATEMENT OF UNDISPUTED FACTS WITH CITATIONS, AND ANALYSIS/COMPARISON OF ORIGINAL NOTICE VERSUS AMENDED NOTICE/CURATIVE EFFORTS AND/OR LACK THEREOF WITH RESPECT TO WINDOW SILL FLASHING AND HEAD FLASHING CLAIMS. DRAFT/REVISE (CONTINUE)) MOTION FOR SUMMARY JUDGEMENT, ANALYSIS AND COMPARISON OF DEFECT	1.45	253.75
				REPORTS/NOTICES FOR INITIAL AND AMENDED EIFS/INSULATION CLAIMS. 4 PAGES.	0.60	105.00
07/29/2018	JWS	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT RE: REVISED CHAPTER 40 CLAIMS.	0.75	131.25
07/31/2018	PCB	L120	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT WEEK'S STATUS HEARING RE: CONTINUE TO GO OVER THE ISSUES THAT WILL NEED TO BE ADDRESSED NEXT WEEK, INCLUDING THE ANTICIPATED MOTIONS THAT STILL NEED TO BE HEARD (AS PER CARRIER DIRECTIVE,	0.10	17.50
	JWS	L120	A103	TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGEMENT, SUPPLEMENTED UNDISPUTED STATEMENT OF FACTS, AND ARGUMENTS RE: INITIAL/SUPPLEMENTAL SEWER CLAIMS (AS PER CARRIER DIRECTIVE, SPLIT WITH OTHER FILE IN SAME CASE- TOWER II).	0.10	17.50 140.00
08/01/2018	PCB	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT ON THE HOA'S AMENDED CHAPTER 40 NOTICE RE: ADDITIONAL ARGUMENTS PERTAINING TO NEW, UNTIMELY DEFECTS, THE CONTINUED LACK OF SPECIFICITY WITH REGARD TO VARIOUS DEFECTS, AND THE HOA'S WEAK EXPLANATION AS TO WHY IT DID NOT PROVIDE NOTICE OF THE ALLEGED SEWER LINE DEFECT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.80	140.00
08/03/2018	LK	L320	A104	REVIEW/ANALYZE AND FINALIZE EXHIBITS TO MOTION FOR SUMMARY JUDGMENT RE: AMENDED CHAPTER 40 CLAIMS, RE: DECLARATIONS/AFFIDAVITS OF EXPERT AND ATTORNEY, CHAPTER 40 CORRESPONDENCE AND DEFECT LIST, IN PREPARATION FOR FILING OF MOTION FOR SUMMARY JUDGMENT WITH COURT.	0.45	42.75
	PCB	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT AS TO THE HOA'S AMENDED CHAPTER 40 NOTICE RE: CONTINUE WORK ON UNDISPUTED MATERIAL FACT SECTION TO MAKE SURE IT COVERS ALL ASPECTS OF THE AMENDED NOTICE THAT DID NOT RECTIFY THE PROBLEMS WITH THE ORIGINAL NOTICE, CONTINUE WORK ON SECTION DEALING WITH APPLICATION OF THE STATUTE TO THE AMENDED CHAPTER 40 NOTICE, CONTINUE WORK ON THE	AA3209	72.13
				0033	AA32U9	

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

				Hours	
JV	WS L2	240 A101	DECLARATIONS IN SUPPORT OF THE MOTION, AND CONTINUE WORK ON THE REQUESTED RELIEF (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR (CONTINUE) MOTION FOR SUMMARY JUDGEMENT, RE: SUPPLEMENTAL ARGUMENTS BASED ON MEET AND CONFER WITH EXPERT RE: NEW ISSUES WHICH COULD HAVE BEEN RAISED AS A PART OF INITIAL INVESTIGATION/FACTUAL BACKGROUND FOR SAME. SPLIT TIME WITH TOWER	1.40	245.00
JV	WS L2	240 A103	TWO CASE. DRAFT/REVISE DECLARATION IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT, ATTORNEY AND ALSO FOR EXPERT, MICHELLE ROBBINS (AS PER CARRIER DIRECTIVE, SPLIT WITH OTHER FILE IN SAME CASE-	1.25	218.75
LK	< L3	20 A104	TOWER II). REVIEW/ANALYZE (CONTINUE) AND FINALIZE ADDITIONAL EXHIBITS TO MOTION FOR SUMMARY JUDGMENT, RE: DECLARATIONS OF ATTORNEY AND EXPERT MICHELLE ROBBINS, IN PREPARATION FOR	0.30	52.50
			FILING WITH COURT.	0.30	28.50
08/04/2018 PC	CB L2	40 A103	COUNSEL RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	8.75
	CB L2		PLAN AND PREPARE FOR TODAY'S STATUS HEARING RE: OUTLINE POSITIONS TO TAKE DURING THE HEARING SHOULD OPPOSING COUNSEL ATTEMPT TO ARGUE THAT THE STAY SHOULD BE LIFTED NOTWITHSTANDING THE MOTION FOR SUMMARY JUDGMENT THAT HAS BEEN FILED REGARDING THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.15	26.25
PC	CB L2	30 A109	APPEAR FOR/ATTEND STATUS CONFERENCE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; BOTH PCB AND JEFF SAAB PRE-APPROVED BY CARRIER TO ATTEND THE HEARING; NO TRAVEL TIME INCLUDED IN THIS ENTRY; LESS TIME BILLED BY PCB THAN JEFF SAAB SINCE PCB HAD TO ATTEND ANOTHER HEARING IN ANOTHER CASE		
PC	CB L2	230 A103	DRAFT/REVISE EMAIL TO ALL CARRIER CONTACTS AND TO COVERAGE COUNSEL RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT	0.35	61.25
JV	NS L2	30 A101	WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR STATUS CHECK HEARING, RE:	0.05	8.75
			STAY OF CASE, MOTION FOR SUMMARY JUDGMENT. 0034	AA3210	

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

									Hours	
				REVIEW OF MC	TION, COURT'S I CASE.	LAST ORDER	R. TIME SPLIT		0.20	35.00
	JWS	L230	A109	APPEAR FOR/A						
					I, RE: CASE STA ′ JUDGMENT. N(
	114/0	1.000	A 4 0 0		TH TOWER II CA		F AND		0.35	61.25
	JWS	L230	A109	APPEAR FOR/A CONFER RE: UI	PCOMING SPEC				0.10	17.50
08/29/2018	РСВ	L240	A108	COMMUNICATE AND WITH COU	(OTHER EXTER					
					TO BE FILED REG N FORM SUMMA					
				THE CONFUSIO	N AS TO WHET	HER THE HEA	ARING OF			
					OR SUMMARY J EW DATE AND \					
				OPPOSITION BI	RIEF AND THE F	_			0.40	47.50
				FILED/SERVED For Current Serv					$\frac{0.10}{17.45}$	17.50
				For Current Serv	ices Rendered				17.45	2,993.75
Timesters	_			T:	Recapitulation	n	Harma	Data		Tatal
Timekeepe Peter C. Br	_				<u>tle</u> ARTNER		Hours 4.20	Rate \$175.00		<u>Total</u> \$735.00
Jeffrey W. S				P/	ARTNER		12.50	175.00		2,187.50
Lexi Kim				P/	ARALEGAL		0.75	95.00		71.25
					Expenses					
06/01/2018		L100	E112	COURT FEES (2000) AMEDICAN	LLECAL SEDV	/ICES NEVADA			
00/01/2016		LIUU	E112	`	5769 PROPOSE	D ORDER - EI	GHTH JUDICIA			2.00
06/04/2018		L100	E112	ODYSSEY (ORE	RT / SERVICES F DER)	PROVIDED ON	1 5/3 1/ 18)			2.88 1.75
06/05/2018		L100		ODYSSEY (NOT						1.75
07/01/2018		L100	E123	OTHER PROFES	NC. (INVOICE N		EPPERS &			362.25
				Total Expenses						368.63
				Total Current Wo	ork					3,362.38
				Previous Balance	е					\$1,950.54
				Balance Due						\$5,312.92
		0-3	80	31-60	Past Due Amou 61-90	ınts 91-120	121-180		<u> 181+</u>	
		3,362.3		0.00	0.00	1,950.54	0.00		0.00	

CHUBB INSURANCE

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210.00

0.00

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

TRIAL PREPARATION AND TRIAL

L400

Split Billing Summary

	<u> </u>	Fees	Expenses	Advances	Total
CHUB	B INSURANCE - Panorama Tower I	0.00	3,362.38		
ESIS [Dallas AGL Claims (2) - Panorama Tower II	2,993.75 2,993.75	368.62	0.00	3,362.37
		5,987.50	737.25	0.00	6,724.75
	<u>Task</u>	Code Summary		_	_
				Fees	Expenses
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMI	NISTRATION		0.00	368.63
L120	ANALYSIS/STRATEGY			227.50	0.00
L130	EXPERTS/CONSULTANTS			113.75	0.00
L190	OTHER CASE ASSESSMENT, DEVELOPMENT & A	ADMINISTRATION		26.25	0.00
L100	CASE ASSESSMENT, DEVELOPMENT AND ADMI	NISTRATION		367.50	368.63
L230	COURT MANDATED CONFERENCES			218.75	0.00
L240	DISPOSITIVE MOTIONS			1977.50	0.00
L200	PRE-TRIAL PLEADINGS AND MOTIONS			2,196.25	0.00
				_,	
L320	DOCUMENT PRODUCTION			71.25	0.00
L340	EXPERT DISCOVERY			148.75	0.00
L300	DISCOVERY			220.00	0.00
	2.555.2			220.00	3.30
L430	WRITTEN MOTIONS AND SUBMISSIONS			210.00	0.00

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

TAX ID # 33-0747275

ESIS Dallas AGL Claims P.O. Box 5127

Scranton, PA 18505

USA

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II Page: 1 December 31, 2018

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				<u>Fees</u>		
09/06/2018	IWS	L120	Δ104	REVIEW/ANALYZE CORRESPONDENCE/NOTES RE:	Hours	
03/00/2010	CW	L320		CASE ACTIVITY IN ORDER TO ASSIST WITH FURTHER CASE HANDLING/DEFENSE STRATEGY. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS RE:	0.10 0.05	17.50 4.75
09/07/2018	JWS	L120	A101	PLAN AND PREPARE (BEGIN) REPLY BRIEF IN SUPPORT	0.03	4.75
		L120		OF MOTION FOR SUMMARY JUDGMENT, TIME SPLIT WITH TWO CASE. COMMUNICATE (OTHER EXTERNAL) MEET AND	0.75	131.25
				TIME TO BE SPLIT WITH TOWER TWO CASE.	0.10	17.50
09/14/2018		L240		REVIEW/ANALYZE (BEGIN) AND OUTLINE OPPOSITION TO BUILDERS MOTION FOR SUMMARY JUDGMENT. SPLIT TIME WITH TOWER TWO CASE.	0.80	140.00
	JWS	L240	A103	DRAFT/REVISE ARGUMENT SUMMARY RE: BUILDER'S MOTION FOR SUMMARY JUDGMENT, ASSOCIATIONS OPPOSITION, AND POTENTIAL ARGUMENTS FOR UTILIZATION IN REPLY BRIEF. SPLIT TIME WITH TOWER TWO CASE.	0.70	122.50
09/18/2018	JWS	L240	A101	PLAN AND PREPARE FOR (CONTINUE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY OF JUDGMENT. FORMULATION OF ARGUMENTS BASED ON REVIEW OF OPPOSITION.	0.65	113.75
09/20/2018	JWS	L120	A104	REVIEW/ANALYZE (LEGAL RESEARCH-MULTIPLE SOURCES) RE: ASSOCIATIONS OPPOSITION, RE: STATUTORY INTERPRETATION, BAR TO CLAIMS BASED	0.00	110.70
				ON INITIAL SUIT, AND DEFENSES TO SAME. TIME SPLIT WITH TOWER TWO CASE. 0037	AA3213	148.75

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					Hours	
09/21/2018	JWS	L120	A104	REVIEW/ANALYZE (CONTINUE- LEGAL RESEARCH-MULTIPLE SOURCES) RE: ASSOCIATIONS OPPOSITION, RE: STATUTORY INTERPRETATION, BAR TO CLAIMS BASED ON INITIAL SUIT, AND DEFENSES TO SAME. TIME SPLIT WITH TOWER TWO CASE.	1.00	175.00
	JWS	L240	A103	DRAFT/REVISE (BEGIN) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT, INTRODUCTION, FACTS, AND SUMMARY OF ARGUMENTS RAISED BY		
	JWS	L240	A104	ASSOCIATION. REVIEW/ANALYZE AND COMPARE EXPERT AFFIDAVITS, SUMMARY OF CLAIMS, INSPECTION NOTES, AND RELATED MATERIAL RE: ALLEGED UNDISPUTED FACTS AS OUTLINED IN THE ASSOCIATIONS OPPOSITION TO	0.80	140.00
	JWS	L240	A103	ASSIST WITH CONTINUATION OF REPLY BRIEF. DRAFT/REVISE (CONTINUE) REPLY BRIEF ARGUMENTS 1-3 RE: ASSOCIATIONS, MISINTERPRETATION OF CASE LAW, COURT'S SEPTEMBER 15, 2018 ORDER, AND	0.85	148.75
	JWS	L240	A103	FAILURE TO INSPECT. DRAFT/REVISE (CONTINUE) REPLY BRIEF ARGUMENT 4	0.90	157.50
				AND CONCLUSION.	0.60	105.00
09/25/2018	PCB	L240	A104	REVIEW/ANALYZE ALL EXHIBITS UTILIZED BY THE HOA IN SUPPORT OF ITS OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (OVER 200 PAGES) IN ORDER TO FIND PORTIONS OF THOSE EXHIBITS TO USE AGAINST THE HOA IN THE SECTIONS OF THE REPLY BRIEF BEING FINALIZED TODAY (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	1.10	203.50
	PCB	L240	A103	DRAFT/REVISE OUTLINE OF ADDITIONAL ARGUMENTS FOR FINALIZATION OF THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE INCLUDING: 1) REWRITING HISTORY; 2) NEW CLAIMS; 3) EXCESSIVE COST OF INVESTIGATION; 4) NRS 40.645(2)(B) AND (C); AND 5) SEWER ISSUES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER	0.55	404.75
	PCB	L240	A103	II). DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE: 1) THE HOA'S ATTEMPT TO REWRITE HISTORY ((AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.55	101.75
	РСВ	L240	A103	CASE - TOWER II). DRAFT/REVISE (CONTINUE) OUTLINE OF ADDITIONAL ARGUMENTS FOR FINALIZATION OF THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: NEW CLAIMS (AS PER CARRIER DIRECTIVE, TIME	0.45	83.25
	PCB	L240	A103	SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT	0.60	111.00
	. 00	L_ TO	71100	0038	AA3214	

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					Hours	
				OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: EXCESSIVE COST OF INVESTIGATION (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.35	64.75
	PCB	L240	A103	DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: NRS 40.645(2)(B) AND (C) (AS PER CARRIER DIRECTIVE, TIME SPLIT	0.55	04.70
	PCB	L240	A103	WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (FINALIZE) REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: SEWER ISSUES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; MORE THAN 8 HOURS BILLED IN ONE DAY ON THIS FILE DUE TO ALL WORK PERFORMED IN FINALIZING THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE, INCLUDING REVIEW OF DOCUMENTS, OUTLINING ADDITIONAL ARGUMENTS, AND DRAFTING FIVE SECTIONS OF NEW	0.65	120.25
09/30/2018	PCB	L240	A101	ARGUMENTS FOR THE REPLY BRIEF). PLAN AND PREPARE (CONTINUE) FOR HEARING OF MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: CONTINUE TO OUTLINE ORAL ARGUMENTS AND TO REVIEW THE ORIGINAL ORDER FROM THE COURT ON THE INITIAL MOTION FOR SUMMARY JUDGMENT ON THE ORIGINAL NOTCIE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER	0.40	74.00
				FILE IN SAME CASE - TOWER II).	0.60	111.00
10/01/2018		L230		REVIEW/ANALYZE (LIMITED SCOPE) CORRESPONENCE/NOTES AND COURT DOCKET RE: UPCOMING HEARING/SCOPE OF SAME.	0.10	17.50
	PCB	L240	A101	PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MOTION FOR SUMMARY JUDGMENT HEARING ON THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER EACH OF THE SECTIONS OF JUDGE JOHNSON'S SEPTEMBER 2017 RULING THAT WILL NEED TO BE RELIED ON DURING ORAL ARGUMENT TOMORROW AND OUTLINING THE POTENTIAL ORAL ARGUMENTS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II)	0.55	101.75
	PCB	L240	A103	DRAFT/REVISE EMAIL TO CARRIERS AND TO COVERAGE COUNSEL RE:	0.00	
	PCB	L240	A101	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S 0039	0.15 AA3215	27.75

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					Hours	
	PCB	L240	A101	HEARING ON THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER ALL DOCUMENTATION PERTAINING TO THE HISTORY OF THE LITIGATION, INCLUDING EVERY PLEADING FILED BY THE HOA THAT DID NOT REFERENCE NRS 40.645(4)(A), IN ORDER TO SUPPORT THE ORAL ARGUMENTS REGARDING WAIVER AND LACHES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE (CONTINUE) FOR HEARING ON THE MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: CONTINUE TO WORK ON ORAL ARGUMENT OUTLINE, WITH SPECIFIC REFERENCE TO EXHIBITS AND DOCUMENTATION FROM THE HOA'S OWN EXPERTS, TO ADDRESS THE SEWER CLAIM AND THE RENEWED ARGUMENT AS TO THE "ABUSE OF PROCESS" POSITION RAISED BY THE	Hours 0.50	92.50
				HOA (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.80	148.00
10/02/2018	PCB	L240	A101	PLAN AND PREPARE (CONTINUE) FOR HEARING TODAY ON MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER EACH OF TWELVE (12) SECTIONS OF ANTICIPATED ORAL ARGUMENT (LITIGATION HISTORY, LACHES, WAIVER, NRS 40.646(4)(A), APPLICATION OF STATUTE TO THE FACTS OF THIS CASE, SATISFACTION OF THAT STATUTE; COURT "GUIDANCE," SEWER LINE RUPTURE, FIRE-BLOCKING, WINDOW ALLEGATION, DUE PROCESS, "NEW" ISSUES, THE COMPLAINT, AND CONCLUSION), IDENTIFYING ADDITIONAL DOCUMENTS TO USE DURING ORAL ARGUMENT TO SUPPORT EACH SECTION, AND PRACTICING ORAL ARGUMENTS FOR EACH SECTION (AS PER CARRIER DIRECTIVE, TIME		0.40.75
	PCB	L240	A109	SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND HEARING ON MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; NO	1.30	240.50
	PCB	L120	A101	TRAVEL TIME INCLUDED IN THIS ENTRY). PLAN AND PREPARE FOR NEXT STEPS OF THE LITIGATION GIVEN THE HEARING THIS MORNING ON THE MOTION FOR SUMMARY JUDGMENT (AS	2.20	407.00
	PCB	L110	A104	PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE (BEGIN) DOCUMENTS FROM THE JOB FILE AND FROM THE HOA (E.G. CC&RS) IN ORDER TO START WORK ON POSSIBLE STANDING MOTION (AS	0.30	55.50
				PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER 0040	AA3216	

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	PCB	L240	A109	FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND HEARING ON MOTION FOR	Hours 0.15	27.75
				SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; SEPARATE TRAVEL TIME BILLED AS PER ESIS GUIDELINES AT 1/2 OF ACTUAL TIME80).	0.20	37.00
10/03/2018	PCB	L120	A104	REVIEW/ANALYZE (CONTINUE) FILE DOCUMENTS FROM THE EARLIER CASE DEALING WITH PANORAMA		
				(SUCH AS STANDING AND UNIT BOUNDARIES)(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.60	111.00
10/04/2018	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH SIMON LOADSMAN (PROPOSED FENESTRATION EXPERT) RE: (AS		
	PCB	L120	A103	PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE REPORT TO CARRIERS RE:	0.20	37.00
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.70	129.50
10/05/2018	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH KEN REID (PROPOSED FENESTRATION EXPERT) RE:	0.05	9.25
10/08/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR SOMPO (JAN DUFFALO) RE:	5.00	0.20
	PCB	L390	A101	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR TODAY'S SPECIAL MASTER HEARING RE: OUTLINE POSITIONS TO TAKE DEPENDING ON WHAT ARGUMENTS MAY BE RAISED BY COUNSEL FOR THE HOA DURING THRE HEARING	0.10	18.50
				TO MOVE THE CASE FASTER THAN SHOULD BE 0041	AA3217	

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					Hours	
				ALLOWED GIVEN THE STILL OUTSTANDING ISSUES OVER THE CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.15	27.75
	PCB	L390	A109	APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; NO TRAVEL TIME INCLUDED IN THIS ENTRY).	0.40	74.00
	PCB	L390	A109	APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; SEPARATE TRAVEL TIME BILLED AS PER ESIS GUIDELINES AT 1/2 OF		
				ACTUAL TIME EXPENDED - 1.2).	0.30	55.50
10/09/2018	PCB	L390	A104	REVIEW/ANALYZE SPECIAL MASTER ORDER ADDRESSING THE ISSUES DISCUSSED YESTERDAY AT THE SPECIAL MASTER HEARING IN ORDER TO MAKE SURE WHAT IS IN THE ORDER IS CORRECT (AS PER		
				CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	9.25
10/11/2018	PCB	L240	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT MOTION TO BE FILED (STANDING) RE: (AS PER CARRIER DIRECTIVE,		
				TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.20	37.00
10/12/2018	PCB	L240	A101	PLAN AND PREPARE FOR (CONTINUE) FOR NEXT DISPOSITIVE MOTION (STANDING) RE: CONTINUE TO OUTLINE THE ARGUMENTS TO USE IN THE MOTION AND THE RELIANCE ON THE CC&RS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
	DRG	L250	A104	CASE - TOWER II). REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT FILED BY DEFENDANTS/THIRD-PARTY PLAINTIFFS PANORAMA TOWERS I, LLC AND PANORAMA II, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT, TO EVALUATE ARGUMENTS AND BASES THEREIN, IN PREPARATION FOR DRAFTING A MOTION FOR	0.20	37.00
	DRG	L250	A104	DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE EXHIBIT A TO MOTION FOR SUMMARY JUDGMENT FILED BY DEFENDANTS/THIRD-PARTY PLAINTIFFS PANORAMA TOWERS I, LLC AND PANORAMA II, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT, RE: UNIT COMPARISONS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING	0.80	132.00
				STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) 0042	AA3218	33.00

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DRG	L250	A104	REVIEW/ANALYZE (BEGIN) DECLARATION OF	Hours	
			COVENANTS, CONDITIONS AND RESTRICTIONS AND GRANT AND RESERVATION OF EASEMENTS FOR PANORAMA TOWERS, (PAGES 1-66), RE: EVALUATE THE PROVISIONS THERE IN CONTEMPLATION OF PREPARING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE	0.70	445.50
DRG	L250	A104	PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND GRANT AND RESERVATION OF EASEMENTS FOR PANORAMA TOWERS, (PAGES 67-142), RE: EVALUATE THE PROVISIONS THERE IN CONTEMPLATION OF PREPARING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE	0.70	115.50
DRG	L250	A104	PER ADJUSTER) REVIEW/ANALYZE TOWER II PLANS AND ASSESSOR MAPS AND PARCEL UNITS, INCLUDING UNIT BOUNDARIES, FROM PRIOR LITIGATION DISCOVERY (P011010-P011102; 96 PAGES) RE: EVALUATED BOUNDARY MAPS IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER	0.85	140.25
DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING IN PART AND DENYING IN PART PLAINTIFF'S MOTION FOR DECLARATORY RELIEF ON STANDING FOR PRIOR AND SEPARATE, SANDSTONE HOA V SANDSTONE CASE, EVALUATE COURT'S ARGUMENTS IN ORDER TO EVALUATE THE POTENTIAL FOR SUCCESS AND ARGUMENTS TO CLARIFY, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING	0.70	115.50
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER REGARDING PLAINTIFF'S MOTION FOR APPROVAL OF NOTICE, WITH STANDING ISSUES EMBEDDED, FOR PRIOR AND SEPARATE, SKY LAS VEGAS ASSOCIATION V. SKY LAS VEGAS CONDOMINIUMS CASE, EVALUATE COURT'S ARGUMENTS IN ORDER TO EVALUATE THE POTENTIAL FOR SUCCESS AND ARGUMENTS TO CLARIFY, IN PREPARATION FOR DRAFTING A MOTION FOR	0.45	74.25
DRG	L250	A104	DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ASSEMBLY BILL 125, RE: ALTERATIONS TO PERTINENT CHAPTER 40 PROVISIONS, INCLUDING THOSE REGARDING REPRESENTATIVE STANDING BY HOMEOWNER'S ASSOCIATIONS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER	0.40	66.00
			0043	AA3219	

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				ADJUSTER)	Hours 0.55	90.75
10/14/2018	PCB	L130	A104	REVIEW/ANALYZE SEVERAL FILE DOCUMENTS THAT PERTAIN TO THE ORIGINAL WINDOW DESIGN, THE POSSIBLE APPLICATION OF THE EFIS SYSTEM REQUIREMENTS TO THE WINDOW ISSUE, THE NEED FOR THE FENESTRATION EXPERTS TO ADDRESS THE QUESTIONS SURROUNDING HOW THE FLASHING FITS INTO THE "UNIT BOUNDARY" DISCUSSION, AND HOW THE WINDOW ISSUES, IF REPAIRED, MAY IMPACT THE ANALYSIS BEING USED TO SUPPORT THE MOTION FOR DECLARATORY RELIEF AS TO STANDING THAT IS BEING PREPARED (AS PER CARRIER DIRECTIVE, TIME		
	JWS	L340	A101	SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR (LIMITED SCOPE) MEET AND CONFER WITH FENESTRATION EXPERTS, REID AND LOADSMAN RE:	0.40	74.00
	JWS	L340	A109	PLIT TIME WITH TOWER TWO CASE. APPEAR FOR/ATTEND EXPERT MEETING WITH DEVIN GIFFORD, KEN REID AND SIMON LOADSMAN,	0.25	43.75
	JWS	L340	A108	. NO TRAVEL TIME IN ENTRY. SPLIT WITH TOWER II CASE. COMMUNICATE (OTHER EXTERNAL) CALL WITH MKA'S SHELLY ROBBINS	1.50	262.50
	DRG	L340	A101	PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS,	0.05	8.75
	DRG	L340	A101	(SPLIT WITH TOWER II FILE PER ADJUSTER) PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS,	0.15	24.75
	DRG	L340	A101	. (SPLIT WITH TOWER II FILE PER ADJUSTER) PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS, RE:	0.70	115.50
	DRG	L340	A109	(SPLIT WITH TOWER II FILE PER ADJUSTER) APPEAR FOR/ATTEND MEETING WITH FENESTRATION EXPERTS, RE:	0.10	16.50
				0044	AA3220	

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				Hours	
			(SPLIT WITH TOWER II FILE PER ADJUSTER)	1.50	247.50
DRG	L250	A104	REVIEW/ANALYZE TOWER PACKAGE PLANS, TOWER I		
			PLANS, TOWER II PLANS, KEY PLANS AND GARAGE PLANS, RE: ANALYZED PLANS FOR THE PROJECT TO		
			LOCATE AND IDENTIFY PLANS INDICATING THE BASIS		
			FOR LACK OF PAN AND HEAD FLASHING AT THE PROJECT IN PREPARATION DRAFTING A MOTION FOR		
			DECLARATORY RELIEF REGARDING STANDING (SPLIT		
DRG	L250	A104	WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE PHOTOS OF INSPECTIONS FROM	0.95	156.75
5	2200	, , , ,	2009 (DSCN6777- 6879; 7637-7978; 7983-8136); TO		
			ILLUMINATE THE BASIS FOR LACK OF PAN AND HEAD FLASHING AT WINDOWS, IN PREPARATION FOR		
			DRAFTING A MOTION FOR DECLARATORY RELIEF		
			REGARDING STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.65	107.25
DRG	L250	A104	,	0.03	107.23
			40 NOTICE, DATED FEBRUARY 24, 2016, INCLUDING EXHIBITS, IN ORDER TO EVALUATE THE BASES OF		
			ALLEGATIONS CONTAINED THEREIN, IN PREPARATION		
			DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE		
			PER ADJUSTER)	0.40	66.00
DRG	L250	A104	REVIEW/ANALYZE PANORAMA HOA'S AMENDED		
			CHAPTER 40 NOTICE, DATED APRIL 5, 2018, INCLUDING ATTACHED EXHIBITS, EXPERT REPORT, AND		
			EVALUATION OF DEFECTS, AND PHOTOGRAPHS, IN		
			ORDER TO EVALUATE THE BASES OF ALLEGATIONS CONTAINED THEREIN, IN PREPARATION DRAFTING A		
			MOTION FOR DECLARATORY RELIEF REGARDING	0.45	74.05
DRG	L250	A104	STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE KRESS V KOREY, NEVADA SUPREME	0.45	74.25
			COURT CASE, RE: DECLARATORY RELIEF AND		
			FACTORS FOR ANALYSIS, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF		
			REGARDING STANDING (SPLIT WITH TOWER II FILE		
DRG	L250	A104	PER ADJUSTER) REVIEW/ANALYZE ONLINE CASE FILINGS, RE: IN	0.35	57.75
2		,	ORDER TO EVALUATE PROCEDURAL HISTORY THUS		
			FAR IN THIS LITIGATION, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF		
			REGARDING STANDING (SPLIT WITH TOWER II FILE		
DRG	L250	A104	PER ADJUSTER) REVIEW/ANALYZE COMPLAINT OF DEFECTS, FILED BY	0.15	24.75
2		,	CLIENTS, IN ORDER TO EVALUATE PROCEDURAL		
			STATUS OF MATTER, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING		
			STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.15	24.75
DRG	L250	A104	REVIEW/ANALYZE ANSWER BY PANORAMA ASSOCIATION TO OUR COMPLAINT AND		
			COUNTER-CLAIM, IN PREPARATION FOR DRAFTING	A A 2221	
			0045	AA3221	

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· ·	0.00
· ·	
DRG L250 A104 REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT AND COURT ORDER REGARDING SAME, RE: IN ORDER TO EVALUATE PROCEDURAL HISTORY AND BASIS FOR ARGUMENTS SUPPORTING DEFICIENCIES IN THE ASSOCIATION'S CHAPTER 40 NOTICE, IN PREPARATION	3.00
FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE	
PER ADJUSTER) 0.20 33	3.00
10/15/2018 JBV L320 A103 DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION SERVICES, RE: REQUEST FOR ACCESS TO CASE ON YES LAW - ONLINE DOCUMENT DEPOSITORY, IN ORDER TO ACCESS DOCUMENTS DISCLOSED IN PRIOR LITIGATION. (SPLIT WITH TOWER II CASE PER	4.75
ADJUSTER). 0.05 4 JBV L320 A104 REVIEW/ANALYZE (BEGIN) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED	4.75
VERSIONS OF ARCHITECTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	
CASE PER ADJUSTER). 0.45 42 JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED VERSIONS OF STRUCTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING	2.75
CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). 0.45 42	2.75
JBV L320 A104 REVIEW/ANALYZE (BEGIN) DOCUMENTS RECEIVED FROM CLIENT DURING PRIOR LITIGATION OF VARIOUS VERSIONS OF ARCHITECTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	
CASE PER ADJUSTER). 0.45 42 JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED VERSIONS OF STRUCTURAL	2.75
PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN 0046 AA3222	

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			Hours	
		CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER	Hours	
JBV L320	A104	ADJUSTER). REVIEW/ANALYZE REVISED OCTOBER 2006 ARCHITECTURAL AND STRUCTURAL PLANS, RE: RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.45	42.75
JWS L240	A101	CASE PER ADJUSTER). PLAN AND PREPARE FOR AND ASSIST WITH FORMULATION OF ARGUMENTS RE: MOTION FOR SUMMARY JUDGEMENT ON STANDING RE: WINDOWS	0.30	28.50
JWS L150	A104	AND POTENTIALLY FIRE BLOCKING. REVIEW/ANALYZE CORRESPONDENCE/NOTES TO ASSIST WITH EVALUATION OF TASKS/DISCOVERY MOVING FORWARD. TIME SPLIT WITH TOWER TWO	0.15	26.25
DRG L250	A104	CASE. REVIEW/ANALYZE NEVADA PRECEDENT, WARTH V SELDIN SUPREME COURT CASE, RE: IN ORDER TO EVALUATE THE SUPREME COURT'S POSITION ON STANDING TO BRING CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE	0.20	35.00
DRG L250	A104	PER ADJUSTER) REVIEW/ANALYZE NEVADA PRECEDENT, DR HORTON V EIGHTH JUDICIAL DISTRICT COURT CASE, RE: IN ORDER TO EVALUATE THE COURT'S POSITION ON ASSOCIATION REPRESENTATIVE STANDING TO BRING CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT	0.15	24.75
DRG L250	A104	WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE NEVADA PRECEDENT, BEAZER HOMES HOLDINGS CORP V EIGHTH JUDICIAL DIST. COURT OF NEV CASE, RE: IN ORDER TO EVALUATE THE COURT'S POSITION ON ASSOCIATION REPRESENTATIVE STANDING TO BRING CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR	0.20	33.00
DRG L250	A103	DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER) DRAFT/REVISE (BEGIN) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, BEGAN PROPOSED LEGAL STANDARD SECTIONS, INCLUDING DECLARATORY RELIEF STANDARDS (SPLIT WITH	0.35	57.75
		TOWER II FILE PER ADJUSTER) 0047	AA3223	90.75

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					Hours	
	DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED PROPOSED LEGAL STANDARD SECTIONS, INCLUDING DECLARATORY RELIEF AND ALTERATIONS TO PERTINENT PROVISIONS WITHIN NRS 40.600 ET SEQ AND NRS 116.3102 (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.70	115.50
	DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, COMMENCED INTRODUCTION, INCLUDING PERTINENT BACKGROUND INFORMATION OBTAINED FROM DOCUMENTS AND ONLINE SOURCES REVIEWED, AND CHAPTER 40 NOTICES SERVED (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.90	148.50
10/16/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) ARCHITECTURAL PLANS FROM PRIOR LITIGATION-REVISED DECEMBER 2016, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION		
	DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER). COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: (SPLIT WITH TOWER II CASE PER	0.45	42.75
	DRG	L340	A108	ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW UP TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: (SPLIT	0.50	82.50
	DRG	L340	A104	WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
	JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF'S EXPERT, ALLEN GROUP IN PRIOR LITIGATION OF ARCHITECTURAL PLANS AND NOTES, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR	0.05	8.25
				0048	AA3224	

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				Hours	
			PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER	riodio	
JBV	L320	Δ104	ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS	0.55	52.25
JDV	L320	A104	DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF		
			TOWER PLANS FROM MAY 2006, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW		
			CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE		
			DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) STRUCTURAL PLANS	0.45	42.75
			FROM PRIOR LITIGATION-REVISED DECEMBER 2016, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST		
			OF WINDOW CHANGES IDENTIFYING CHANGES MADE		
			TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS		
			INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION		
JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS	0.45	42.75
021	2020	71101	DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF		
			"KEY" PLANS FROM MAY 2007, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW		
			CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE		
			DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.45	40.75
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (BEGIN) CLARK COUNTY CITY	0.45	42.75
			DEPARTMENT OF DEVELOPMENT SERVICES DOCUMENTATION (FOLDERS 01-05), PRODUCED IN		
			PRIOR LITIGATION BY PLAINTIFF, RE: DETERMINING IF ANY REFERENCE EXISTS WITHIN WHICH CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO		
			THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN		
			PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
DRG	L250	A104	CASE PER ADJUSTER). REVIEW/ANALYZE AAMA GLOSSARY FROM EXPERT,	0.30	28.50
2.10			SIMON LOADSMAN, RE:		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L250	A104	REVIEW/ANALYZE IPCB-08 MANUAL, AAMA STANDARD PRACTICE FOR INSTALLATION OF WINDOWS AND		
			DOORS IN COMMERCIAL BUILDINGS, CONFIGURATION 0049	AA3225	
			UU47		

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					Hours	
	DRG	L250	A103	OF PAN FLASHING TO WINDOW SYSTEMS, IN ORDER TO INCORPORATE INTO MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DISCUSSION OF ASSOCIATION'S CHAPTER	0.30	49.50
	DRG	L250	A103	40 NOTICE AND AMENDED CHAPTER 40 NOTICE, AND DECLARATORY RELIEF ARGUMENTS (SPLIT WITH TOWER II FILE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DECLARATORY RELIEF ARGUMENTS AS TO WHY DECLARATORY RELIEF IS APPROPRIATE (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.85 0.70	140.25 115.50
10/17/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) CLARK COUNTY CITY DEPARTMENT OF DEVELOPMENT SERVICES DOCUMENTATION (FOLDERS 06-09), PRODUCED IN PRIOR LITIGATION BY PLAINTIFF, RE: DETERMINING IF ANY REFERENCE EXISTS WITHIN WHICH CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
	JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF TOWER PLANS INCLUDED WITH VARIOUS EXPERT JOB FILES SUCH AS STRUCTURAL AND ARCHITECTURAL, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION	0.45	42.75
	DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' PRESENTATION OF DEFECTS AND PHOTOS FROM PRIOR LITIGATION INVOLVING PANORAMA TOWERS, RE: IN AN EFFORT TO LOCATE DOCUMENTS PERTAINING TO EIFS AND EIFS MANUFACTURER, STO, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE	0.55	52.25
	DRG	L120	A104	PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' DISCLOSURE DOCUMENTS, (P0022385), HUNDREDS OF FILE PHOTOS ON DISC, RE: IN AN EFFORT TO LOCATE DOCUMENTS AND PLANS, PERTAINING TO EIFS AND EIFS	0.20	33.00
				0050	AA3226	

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				Hours	
DRG	L250	A104	MANUFACTURER, STO, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' DISCLOSURE DOCUMENTS, (P0022386), HUNDREDS OF FILE PHOTOS ON DISC, RE: IN AN EFFORT TO LOCATE DOCUMENTS AND PLANS, PERTAINING TO EIFS AND EIFS MANUFACTURER, STO, IN PREPARATION FOR	0.15	24.75
DRG	L340	A104	DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.15	24.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH MKA EXPERT, SHELLEY ROBBINS, RE:	0.15	24.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.20	33.00
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE 2011-070 BOX OF CASE INFORMATION FROM STORAGE, RE: PRIOR LITIGATION DOCUMENTS, IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT	0.25	41.25
DRG	L250	A104	TO NOT INCLUDE HEAD FLASHINGS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE 2011-072 BOX OF CASE INFORMATION FROM STORAGE, RE: PRIOR LITIGATION DOCUMENTS, IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT	0.20	33.00
			TO NOT INCLUDE HEAD FLASHINGS, IN PREPARATION 0051	AA3227	

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				Hours	
			FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE	riodio	
DRG	L250	A104	PER ADJUSTER). REVIEW/ANALYZE TOWER PACKAGE PLANS FROM ARCHITECT, (APPROX 198 PLANS), RE: IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT TO NOT INCLUDE HEAD	0.30	49.50
DRG	L250	A104	FLASHINGS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, RE: ANALYZED STO MATERIALS AND DETAILS, IN ORDER TO IDENTIFY THE BASIS FOR THE ASSOCIATION'S ARGUMENTS IN SUPPORT OF HEAD FLASHINGS AT THE PROJECT, IN	0.40	66.00
DRG	L250	A103	PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE	0.15	24.75
DRG	L250	A103	INTERESTS, ARGUMENTS REGARDING WHY ASSOCIATION LACKS STANDING TO BRING NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE TO ENACTMENT OF AB 125. DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE	0.90	148.50
JBV	L320	A104	INTERESTS, ARGUMENTS REGARDING WHY ASSOCIATION LACKS STANDING TO BRING NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE TO ENACTMENT OF AB 125. REVIEW/ANALYZE (BEGIN) DISCS FROM PRIOR LITIGATION OF DEFENDANT DISCLOSURES (PLANS FROM OCTOBER THROUGH MARCH 2007; VARIOUS	0.85	140.25
JBV	L320	A104	DRAWS FOR MJ DEAN ALONG WITH INVOICES AND JOB FILE DOCUMENTS FOR SUBCONTRACTORS), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF DEFENDANT DISCLOSURES (NON-PLAN DOCUMENTATION INCLUDING ADDITIONAL DRAWS	0.60	57.00
			FOR BOTH TOWERS), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING 0052	AA3228	

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					Hours	
				CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.55	52.25
10/18/2018	JBV	L320	A104	REVIEW/ANALYZE (BEGIN) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI 0000001-2500), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER		
	JBV	L320	A104	ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI 0002501-5000), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION	0.45	42.75
	JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI 0005001-6369), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION	0.45	42.75
	JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0006370-6600), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING	0.30	28.50
				0053	AA3229	

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				Hours	
JBV	L320	A104	LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0006601-6800), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO	0.45	42.75
JBV	L320	A104	LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0006801-7000), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO	0.45	42.75
JBV	L320	A104	DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0007001-7200), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS	0.40	38.00
PCB	L240	A103	WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF AS TO STANDING RE: CONTINUE TO DRAFT SECTIONS WHICH DEAL WITH THE COMMON AREAS OF THE PROJECT AS COMPARED TO THE SEPARATE INTEREST AREAS WHICH ARE THE	0.40	38.00
DRG	L340	A104	RESPONSIBILITY OF THE UNIT OWNERS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.60	111.00
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE MKA REPORT 0054	0.05 AA3230	8.25

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				Hours	
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER). COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SHELLY ROBBINS, RE:	0.35	57.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE SUPPLEMENTAL CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.10	16.50
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLANS SENT FROM EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
DRG	L340	A104	TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE REPORT	0.10	16.50
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0019508-D0021251, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE	0.15	24.75
DRG	L250	A104	PRIOR LITIGATION, D00D0067001-D0078221) RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT	0.35	57.75
DRG	L250	A104	FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0021252-0033000, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL	0.40	66.00
DRG	L250	A104	APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0033001-D0044000, RE: ANALYZED 0055	0.35 AA3231	57.75

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

10/19/2018

				Hours	
			DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.30	49.50
DRG	L250	A104	REVIEW/ANALYZE DISCLOSED PLANS REGARDING TOWER I AND TOWER II, FOR ARCHITECTURALS (A0001-A114 FOR TOWER II AND A-0001-A-0208 FOR TOWER I), IN ORDER TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II		
DRG	L250	A104	CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0044001-D0052455, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE	0.40	66.00
DRG	L250	A103	DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, ARGUMENTS REGARDING WHY ASSOCIATION LACKS STANDING TO BRING NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE TO ENACTMENT OF AB 125 AND BEGAN ARGUMENTS WHY REPAIRS AND MAINTENANCE OF WINDOWS FALLS UP ON UNIT OWNERS, NOT ASSOCIATION. (SPLIT WITH TOWER II CASE PER	0.35	57.75 74.25
DRG	L250	A103	DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY REPAIRS AND MAINTENANCE OF WINDOWS FALLS UP ON UNIT OWNERS, NOT ASSOCIATION AND BEGAN ARGUMENTS FOR WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER	0.45	
JBV	L320	A104	ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0007201-7800), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS	0.65 AA3232	107.25
			0056	11110202	

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				Hours	
JBV	L320	A104	WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0007801-8400), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING	0.60	57.00
JBV	L320	A104	CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0008401-9000), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW	0.60	57.00
JBV	L320	A104	FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0009001-9900), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS	0.45	42.75
JBV	L320	A104	WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10:	0.55	52.25
			KLAI 0009901-10568), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION 0057	AA3233	

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				Hours	
JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI 010569-11200), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING	0.40	38.00
JBV	L320	A104	ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE EXHIBITS A-E FOR MOTION FOR CLIENT'S MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: BATES LABELED IN	0.55	52.25
DRG	L250	A108	ACCORDANCE WITH E.D.C.R. 2.27, IN PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION. COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.30	28.50
DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, KEN REID,, RE:	0.10	16.50
DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE:	0.10	16.50
DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE:	0.10	16.50
DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION	0.05	8.25
DRG	L250	A103	STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD	0.70	115.50
			FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE 0058	AA3234	

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				THE COORE OF THE ACCOUNTIONS DESPONSIBILITIES	Hours	
				THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.35	57.75
	DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR	0.00	07.70
				DECLARATORY RELIEF REGARDING ASSOCIATION		
				STANDING TO BRING CLAIMS FOR SEPARATE		
				INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER		
				ADJUSTER).	0.45	74.25
					51.15	0
10/22/2018	PCB	L240	A103	DRAFT/REVISE (CONTINUE) MOTION FOR		
				DECLARATORY RELIEF RE: ADDITIONAL WORK ON		
				SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE		
				CC&R'S, AND THE APPLICATION OF ALL THOSE		
				FACTORS TO THE POSITION THE HOA IS TAKING ON		
				THE AMENDED CHAPTER 40 NOTICE FOR WINDOW		
				ISSUES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.90	166.50
	JBV	L320	A104	REVIEW/ANALYZE EXHIBITS E-H FOR MOTION FOR	0.90	100.50
				CLIENT'S MOTION FOR DECLARATORY RELIEF		
				REGARDING STANDING, RE: BATES LABELED IN		
				ACCORDANCE WITH E.D.C.R. 2.27, IN PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION.	0.30	28.50
	JBV	L320	A103	DRAFT/REVISE APPENDIX OF EXHIBITS TO CLIENT'S	0.30	20.50
			71.00	MOTION FOR DECLARATORY RELIEF REGARDING		
				STANDING, RE: LISTING ALL EXHIBITS, SIZE OF SAID		
				EXHIBITS AND LOCATIONS OF EACH, PURSUANT TO	0.45	44.05
	JBV	L320	Δ104	E.D.C.R. 2.27. REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR	0.15	14.25
	3D V	L020	7,104	LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10:		
				KLAI 011201-11800), RE: DETERMINING EXACT		
				DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS		
				WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW		
				FRAMEWORK REQUIREMENTS FOR INSTALLATION AS		
				WELL AS EIFS INFORMATION STEMMING FROM STO		
				AND SPECIFICATIONS REFLECTING DEFERMENT TO		
				DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND EVALUATION TO		
				PREPARE FOR ARGUMENTS IN SUPPORT OF POSITION		
				THAT EIFS MANUFACTURER DEFERRED TO THE		
				DESIGNER (SPLIT WITH TOWER II CASE PER		
	ID) (1.000	1101	ADJUSTER).	0.60	57.00
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10:		
				KLAI 011801-12300), RE: DETERMINING EXACT		
				DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS		
				WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING		
				CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS		
				WELL AS EIFS INFORMATION STEMMING FROM STO		
				AND SPECIFICATIONS REFLECTING DEFERMENT TO		
				0059	AA3235	

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			DESIGNER, IN PREPARATION FOR PROVIDING	Hours	
DRG	L250	A108	ATTORNEY FOR ANALYSIS AND EVALUATION TO PREPARE FOR ARGUMENTS IN SUPPORT OF POSITION THAT EIFS MANUFACTURER DEFERRED TO THE DESIGNER (SPLIT WITH TOWER II CASE PER ADJUSTER). COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL TO KEN REID, EXPERT FOR FENESTRATION, RE:	0.45	42.75
DRG	L250	A104	WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AFFIDAVIT FROM EXPERT, KEN REID, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF	0.05	8.25
DRG	L250	A108	REGARDING STANDING, IN ORDER TO DETERMINE WHETHER TO INCORPORATE INTO MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
DRG	L250	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
DRG	L250	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AAMA STANDARDS GLOSSARY, EVALUATED THE TERM "ASSEMBLED UNIT" IN ORDER EVALUATE THE POTENTIAL THAT THE OPPOSING SIDE WILL USE IT AGAINST US, AND THE HARM THAT MIGHT CAUSE, IN PREPARATION FOR UPDATING AFFIDAVIT	0.10	16.50
DRG	L250	A103	FROM SIMON LOADSMAN, WINDOW EXPERT, TO INCORPORATE INTO MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: CONTINUED CRAFTING ARGUMENTS 1 THROUGH 3 IN	0.10	16.50
DRG	L250	A104	PREPARATION FOR FILING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FOLLOW-UP TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN,	0.85	140.25
			0060	AA3236	

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					Hours	
	DRG	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE:	0.05	8.25
	DRG	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: FINALIZED MOTION, INCLUDING UPDATED ARGUMENT	0.20	33.00
				2 REGARDING MAINTENANCE OBLIGATIONS OF THE HOMEOWNER VERSUS THE ASSOCIATION. (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45	74.25
10/24/2018	PCB	L120	A103	DRAFT/REVISE UPDATE TO CARRIERS RE:		
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
				CASE - TOWER II).	0.35	64.75
10/26/2018	JBV	L320	A104	REVIEW/ANALYZE PLAINTIFF'S AMENDED CHAPTER 40 PLEADING FROM APRIL 2018, RE: DETERMINING DESCRIPTION OF EXHIBITS FROM WITHIN SUCH AS EXPERT REPORTS AND ALLEGATIONS, IN PREPARATION FOR DESCRIBING SAID ALLEGATIONS		
	JBV	L320	A104	WITHIN CORRESPONDENCE TO SUBCONTRACTORS INDICATING NEW NRS 40.646 IDENTIFIED DEFECTS. REVIEW/ANALYZE PREVIOUSLY PROVIDED CORRESPONDENCE TO AQUAMATIC, RE:	0.15	14.25
				DETERMINING INFORMATION IDENTIFIED WITHIN, IN PREPARATION FOR PROVIDING CORRESPONDENCE IDENTIFYING INFORMATION FROM WITHIN PLAINTIFF'S AMENDED NRS 40.646 PLEADING.	0.05	4.75
	JBV	L320	A103	DRAFT/REVISE CORRESPONDENCE TO AQUAMATIC, RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED		
				DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID SUBCONTRACTOR.	0.15	14.25
10/29/2018	JBV	L320	A104	REVIEW/ANALYZE PLEADINGS FILED, REPORTS SUBMITTED AND DISCOVERY DOCUMENTATION BETWEEN SEPTEMBER 2017 THROUGH PRESENT, RE:		
				0061	AA3237	

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					Harma	
	JBV	L320	A104	DETERMINING WHEN STAY OF LITIGATION WAS IMPLEMENTED AND COMPLETED, IN PREPARATION FOR INCLUDING SAID INFORMATION WITHIN CLIENTS' CORRESPONDENCE TO ALL SUBCONTRACTORS INDICATING NEW DEFECT ALLEGATIONS FROM AMENDED NRS 40.646 PLEADING RECEIVED. REVIEW/ANALYZE AQUAMATIC AND BOMBARD MECHANICAL'S SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT ALLEGATIONS WITHIN.	Hours 0.45 0.30	42.75 28.50
10/30/2018	JBV	L320	A104	REVIEW/ANALYZE VICTAULIC COMPANY, TEXAS WALL SYSTEMS AND SIERRA GLASS & WINDOW SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT ALLEGATIONS WITHIN.	0.40	38.00
	JBV	L320	A104	REVIEW/ANALYZE OLD CASTLE BUILDING ENVELOPE, OLD CASTLE, LLC AND OLD CASTLE, INC. SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT		
	JBV	L320	A104	ALLEGATIONS WITHIN. REVIEW/ANALYZE INSULPRO PROJECTS, FORD CONTRACTING AND FLIPPINS TRENCHING SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT	0.30	28.50
	JBV	L320	A104	ALLEGATIONS WITHIN. REVIEW/ANALYZE CULLIGAN WATER AND CULLIGAN WATER ASSOCIATED COMPANIES SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT	0.40	38.00
	JBV	L320	A104	ALLEGATIONS WITHIN. REVIEW/ANALYZE CLIENT'S MOTION FOR SUMMARY	0.20 AA3238	19.00
				0062	AAJ4J0	

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			JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S APRIL 5, 2018 AMENDED NOTICE OF	Hours	
			CLAIMS, RE: DETERMINING WHEN SAID MOTION WAS HEARD, IN PREPARATION FOR INCLUDING SAID INFORMATION INTO CORRESPONDENCE TO ALL SUBCONTRACTORS INFORMING EACH OF THE AMENDED NRS 40.646 DEFECT ALLEGATIONS.	0.10	9.50
JBV	L320	A103	DRAFT/REVISE (UPDATE) AQUAMATIC CHAPTER 40 CORRESPONDENCE, RE: INCLUDING ADDITIONAL INFORMATION RELATING TO MOTION FILED BY CLIENT WHICH LEAD TO THE LIFTING OF STAY OF LITIGATION,		
JBV	L320	A108	AS REQUESTED BY ATTORNEY. COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.10	9.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING CURRENT CORPORATE INFORMATION FOR EACH	0.15	14.25
JBV	L320	A104	SUBCONTRACTOR/MANUFACTURER TO BE INFORMED OF AMENDED CHAPTER 40 STATUS, IN ORDER TO ENSURE EACH IS SERVED AT CORRECT LOCATION. REVIEW/ANALYZE OCIP SUBCONTRACTOR MATRIX, RE:	0.30	28.50
			DETERMINING SCOPES OF WORK FOR SUBCONTRACTORS, IN PREPARATION FOR DETERMINING WHICH ADDITIONAL SUBCONTRACTORS SHOULD BE PROVIDED WITH CHAPTER 40 INFORMATION PURSUANT TO NRS 40.646.	0.10	9.50
JBV	L320	A104	REVIEW/ANALYZE SCOPE OF WORK MATRICES (DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION), RE: DETERMINING SUBCONTRACTORS WITHIN, IN PREPARATION FOR DETERMINING SAID	0.10	0.00
JBV	L320	A103	SUBCONTRACTORS' SCOPES OF WORK TO DETERMINE WHICH ADDITIONAL SUBCONTRACTORS SHOULD BE PROVIDED WITH NEW DEFECT ALLEGATION INFORMATION PURSUANT TO NRS 40.646. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS &	0.15	14.25
			ASSOCIATES, RE:		
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI 012301-013704), RE: DETERMINING EXACT	0.05 AA3239	4.75
			0063	AA3433	

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			DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND SPECIFICATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND EVALUATION AND PREPARATION FOR ARGUMENTS IN SUPPORT OF POSITION THAT EIFS MANUFACTURER DEFERRED TO	Hours	
			THE DESIGNER (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.60	57.00
DRG	L230	A104	•	0.00	37.00
DRG	L120	A104	SAME (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE RECENT NEVADA CASE LAW, REYBURN LAWN AND MAINTENANCE SUPREME COURT CASE, RE: ANALYZED CASE IN ORDER TO EVALUATE	0.05	8.25
DRG	L120	A104	THE DUTY TO INDEMNIFY AND TO ESTABLISH LEGAL AUTHORITY WITHIN TENDER LETTERS TO SUBCONTRACTORS, IN PREPARATION FOR SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE RECENT NEVADA CASE LAW, SILVER V TELERANT LEASING CASE SUPREME COURT CASE, RE: ANALYZED CASE IN ORDER TO EVALUATE THE DUTY TO INDEMNIFY AND TO ESTABLISH LEGAL	0.60	99.00
DRG	L340	A108	AUTHORITY WITHIN TENDER LETTERS TO SUBCONTRACTORS, IN PREPARATION FOR SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) CONFERENCE CALL WITH EXPERT, SHELLY ROBBINS, RE;	0.35	57.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, RE: CLAIMS ALLEGED VERSUS SUBCONTRACTORS' SCOPES OF WORK, IN PREPARATION FOR SUBMISSION OF TENDER LETTERS	0.15	24.75
DRG	L340	A104	TO THE SUBCONTRACTORS (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AQUAMATIC'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR	0.15	24.75
DRG	L340	A104	NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE BOMBARD MECHANICAL'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE	0.10	16.50
DRG	L340	A104	WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CULLIGAN WATER'S PRIOR TENDER LETTER, RE: IN ORDER TO EVALUATE WHETHER OR	0.10	16.50
			NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM 0064	AA3240	

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DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FLIPPIN'S TECHNOLOGY'S PRIOR	Hours 0.05	8.25
			TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE		
DRG	L340	Δ10/	SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FORD CONTRACTING'S PRIOR	0.10	16.50
DING	L340	A104	TENDER LETTER, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE		
DDC	1.240	A 1 O 1	SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE FORD CONTRACTING'S PRIOR TENDER LETTER, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER		
DRG	L340	A104	ADJUSTER)	0.05	8.25
DICO	L340	A104	LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM		
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
			LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE OLD CASTLE BUILDING ENVELOPE'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE	0.05	0.23
			WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER		
DRG	L340	A104	ADJUSTER REVIEW/ANALYZE SIERRA GLASS'S PRIOR TENDER	0.05	8.25
			LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (OR AT MITTER TO MER IN CASE DEPLATED)	0.05	0.05
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TEXAS WALL SYSTEMS' PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE	0.05	8.25
			WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER		
DRG	L340	A104	ADJUSTER) REVIEW/ANALYZE VICTAULIC'S PRIOR TENDER	0.05	8.25
			LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM		
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE SUBCONTRACTOR SCOPES OF	0.05	8.25
			WORK FOR TOWER I, COMPARED WITH CLAIMS ALLEGED IN THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN ORDER TO DETERMINE WHICH		
			SUBCONTRACTORS TO TENDER (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L340	A104	REVIEW/ANALYZE SUBCONTRACTOR SCOPES OF WORK FOR TOWER II, COMPARED WITH CLAIMS		-
			ALLEGED IN THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN ORDER TO DETERMINE WHICH	AA3241	
			0065	11113271	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

					Hours	
				SUBCONTRACTORS TO TENDER (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
10/31/2018	JBV	L320	A104	REVIEW/ANALYZE RESPONSE EMAIL CORRESPONDENCE FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: ADDITIONAL SUBCONTRACTORS TO POTENTIALLY INFORM OF NEW DEFECT ALLEGATIONS, IN PREPARATION FOR COMPLYING WITH NRS 40.646 REQUIREMENTS.	0.05	4.75
	JBV	L320	A104	REVIEW/ANALYZE PRIOR LITIGATION DOCUMENTATION, RE: DETERMINING IF SUBCONTRACTS LIE WITHIN FOR VARIOUS SUBCONTRACTORS, SPECIFICALLY DEAN ROOFING AND HAMMOND CAULKING, IN PREPARATION FOR DETERMINING SPECIFIC SCOPE OF WORK FOR ALL SUBCONTRACTORS AND WHETHER THE NEW		
	PCB	L230	A109	ALLEGED DEFECTS RELATE. APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER	0.55	52.25
	PCB	L230	A109	FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; ALSO BILLED AT FULL AMOUNT OF TIME, BUT AT 1/2 REGULAR HOURLY RATE	0.40	74.00
	DRG	L340	A104	AS PER CARRIER DIRECTIVE). REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.45	83.25
	DRG	L120	A103	DRAFT/REVISE (BEGIN) FULL NRS 40.645 NOTICE AND REQUEST FOR INDEMNITY AND DEFENSE, INCLUDING CASE LAW IN SUPPORT THEREOF, TO BE SENT TO SUBCONTRACTORS (SPLIT WITH TOWER II CASE PER	0.05	8.25
	DRG	L120	A103	ADJUSTER) DRAFT/REVISE (BEGIN) NRS 40.645 GENERAL NOTICE OF CONSTRUCTIONAL DEFECTS, FOR SUBCONTRACTORS PREVIOUSLY NOTIFIED OF THE LITIGATION (SPLIT WITH TOWER II CASE PER	0.95	156.75
	DRG	L120	A103	ADJUSTER) DRAFT/REVISE (BEGIN) NRS 40.645 GENERAL NOTICE OF CONSTRUCTIONAL DEFECTS, FOR SUBCONTRACTORS NOT PREVIOUSLY NOTIFIED OF ONGOING LITIGAITON (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.60	99.00
11/01/2018	PCB	L190	A103	DRAFT/REVISE (CONTINUE) AMENDED CHAPTER 40 NOTICES TO SUBCONTRACTORS THAT PREVIOUSLY RECEIVED NOTICES, SUBCONTRACTORS THAT ARE GOING TO RECEIVE NOTICES FOR THE FIRST TIME, AND PRODUCT MANUFACTURERS WHICH WERE NOT		
				0066	AA3242	

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				Hours	
			PART OF THE OCIP RE: CLARIFICATION IN EACH LETTER OF THE FACTS SURROUNDING THE BASIS FOR THE NEW AND AMENDED NOTICES, THE RECENT STAY ON THE LITIGATION, AND THE AMENDED NOTICE FROM THE HOA AND WHY IT WAS ISSUED (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
JBV	L320	A104	CASE - TOWER II). REVIEW/ANALYZE CENTRO, INC., DEAN ROOFING & INSULATION, DEAN ROOFING CO., DEAN INDUSTRIES, EXPANSION SPECIALTIES PROPERTIES, EXPANSION SPECIALTIES, INC., F. RODGERS CORP., F. RODGERS HOME IMPROVEMENT, F. RODGERS INSULATION OF NEVADA AND F. RODGERS INSULATION RESIDENTIAL SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING	0.40	74.00
ID\/	L320	A 1 O 4	DOCUMENTATION INCORPORATING NEW DEFECT ALLEGATIONS WITHIN. REVIEW/ANALYZE JETSTREAM CONSTRUCTION, K&G	0.45	42.75
JDV	L320	A104	CONSTRUCTION, LONE MOUNTAIN EXCAVATION & UTILITIES, MESA MECHANICAL, INC., XTREME PLASTERING, LLC AND XTREME MANUFACTURING SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT		
JBV	L320	A104	ALLEGATIONS WITHIN. REVIEW/ANALYZE FIVE STAR PLUMBING, SILVER STAR PLUMBING, INC., SILVER STAR PLUMBING, LLC, HAMMOND CAULKING, INSULATION MAINTENANCE & CONTRACTING, INC. AND INSULATION MAINTENANCE & CONTRACTING LLC SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION	0.40	38.00
JBV	L320	A103	INCORPORATING NEW DEFECT ALLEGATIONS WITHIN. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING NEW INFORMATION RELATING TO CURRENT CORPORATE INFORMATION FOR EACH SUBCONTRACTOR/MANUFACTURER TO BE INFORMED OF AMENDED CHAPTER 40 STATUS, IN ORDER TO ENSURE EACH IS SERVED AT CORRECT	0.30	28.50
JBV	L320	A104	LOCATION. REVIEW/ANALYZE (CONTINUE) PLAINTIFF'S AMENDED CHAPTER 40 PLEADING FROM APRIL 2018, RE: DETERMINING WHICH ALLEGATIONS WITHIN DESCRIBE	0.30	28.50
			0067	AA3243	

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				Hours	
			EACH SUBCONTRACTOR/MANUFACTURER'S SCOPE OF WORK, IN PREPARATION FOR DESCRIBING SAID ALLEGATIONS WITHIN CORRESPONDENCE TO SAID SUBCONTRACTOR INDICATING NEW NRS 40.646	riours	
JBV	L320	A104	IDENTIFIED DEFECTS. REVIEW/ANALYZE PREVIOUSLY PROVIDED CORRESPONDENCE TO BOMBARD MECHANICAL, FLIPPINS TRENCHING, FORD CONTRACTING, INSULPRO PROJECTS, INC. AND SIERRA GLASS & WINDOW, RE: DETERMINING DEFECTS IDENTIFIED	0.30	28.50
			WITHIN WHICH CAN RELATE TO SAID SUBCONTRACTORS' SCOPES OF WORK, IN PREPARATION FOR PROVIDING CORRESPONDENCE IDENTIFYING INFORMATION FROM WITHIN PLAINTIFF'S AMENDED NRS 40.646 PLEADING.	0.20	19.00
JBV	L320	A103	DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE TO BOMBARD MECHANICAL, FLIPPINS TRENCHING, FORD CONTRACTING, INSULPRO PROJECTS, INC. (TWO CORRESPONDENCE) AND SIERRA GLASS & WINDOW, RE: PROVIDING		
JBV	L320	A103	INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID SUBCONTRACTORS. DRAFT/REVISE NEW CHAPTER 40 CORRESPONDENCE TO DEAN ROOFING CO. (TWO CORRESPONDENCE), F. RODGERS CORP., F. RODGERS INSULATION,	0.45	42.75
			INSULPRO, INC., MESA MECHANICAL, SOUTHERN NEVADA PAVING, X-TREME X-CAVATION, RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID		
JBV	L320	A103	CORRESPONDENCE TO OLD CASTLE BUILDING ENVELOPE, OLD CASTLE, INC. AND TEXAS WALL SYSTEMS, RE: PROVIDING INFORMATION RELATING TO	0.60	57.00
JBV	L320	A103	PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID MANUFACTURERS. DRAFT/REVISE (CONTINUE) CHAPTER 40 MATRIX, RE: INCORPORATING CERTIFIED MAIL INFORMATION RELATING TO EACH	0.30	28.50
DDC	L230	A 10.4	SUBCONTRACTOR/MANUFACTURER PROVIDED WITH NRS 40.646 INFORMATION IN ORDER TO ENSURE EACH IS SERVED AND SIGNED FOR BY A REPRESENTATIVE OF EACH COMPANY. REVIEW/ANALYZE NOTICE OF SPECIAL MASTER	0.20	19.00
DRG	L230	A 104	HEARING, SERVED ON ALL COUNSEL, IN PREPARATION FOR SAME (SPLIT WITH TOWER II CASE PER	0.05	8.25
DRG	L120	A104	ADJUSTER). REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM PRIOR LITIGATION REGARDING PANORAMA	AA3244	0.20
			0068	1112211	

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				Hours	
DRG	L120	A104	TOWERS, (MJD0000001-5647; APPROX. 5647 PAGES), ANALYZED DOCUMENTS TO IDENTIFY AND EVALUATE CONTRACTUAL DOCUMENTATION, INCLUDING SCOPES OF WORK, FOR SUBCONTRACTORS ON THE PANORAMA PROJECT, IN PREPARATION FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM PRIOR LITIGATION REGARDING PANORAMA TOWERS, (MJD005648-9507; APPROX. 3860 PAGES), ANALYZED DOCUMENTS TO IDENTIFY AND EVALUATE CONTRACTUAL DOCUMENTATION, INCLUDING SCOPES	0.70	115.50
DRG	L120	A104	OF WORK, FOR SUBCONTRACTORS ON THE PANORAMA PROJECT, IN PREPARATION FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM PRIOR LITIGATION REGARDING PANORAMA TOWERS, (MJD00015953-16576; APPROX. 623 PAGES), ANALYZED DOCUMENTS TO IDENTIFY AND EVALUATE	0.55	90.75
DRG	L120	A104	CONTRACTUAL DOCUMENTATION, INCLUDING SCOPES OF WORK, FOR SUBCONTRACTORS ON THE PANORAMA PROJECT, IN PREPARATION FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	74.25
DRG	L120	A104	WITH ALLEGATIONS IN THE ASSOCIATION'S CHAPTER 40 NOTICE, IN PREPARATION FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE SUBCONTRACT AGREEMENTS FOR TOWER II (APPROX 368 PAGES), EVALUATED SCOPES OF WORK FOR SUBCONTRACTORS IN COMPARISON WITH ALLEGATIONS IN THE ASSOCIATION'S CHAPTER	0.40	66.00
DRG	L340	A103	40 NOTICE, IN PREPARATION FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE CORRESPONDENCE TO EXPERT, RE:	0.35	57.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.10	16.50
			0069	AA3245	

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					Hours	
	DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT,	0.05	8.25
	DRG	L340	A104	SHELLY ROBBINS, RE: REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
	DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
				SHELLY ROBBINS, RE.	0.05	8.25
11/02/2018	JBV	L320	A104	REVIEW/ANALYZE CHAPTER 40 MATRIX, RE OBTAINING CORPORATE INFORMATION FOR FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE LOCATIONS), IN PREPARATION FOR PROVIDING CHAPTER 40 PLEADING INDICATING NEW DEFECT ALLEGATIONS FROM ASSOCIATION, PURSUANT TO		
	JBV	L320	A103	NRS 40.646. DRAFT/REVISE NEW CHAPTER 40 CORRESPONDENCE TO FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE CORRESPONDENCE), RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID	0.10	9.50
	JBV	L320	A103	SUBCONTRACTORS. DRAFT/REVISE (CONTINUE) CHAPTER 40 MATRIX, RE: INCORPORATING CERTIFIED MAIL INFORMATION RELATING TO FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE CORRESPONDENCE) PROVIDED WITH NRS 40.646 INFORMATION IN ORDER TO ENSURE EACH IS SERVED AND SIGNED FOR BY A	0.20	19.00
	DRG	L340	A108	REPRESENTATIVE OF EACH COMPANY. COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: (SPLIT WITH TOWER II	0.10	9.50
				CASE PER ADJUSTER).	0.10	16.50
11/07/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR BOMBARD MECHANICAL AND FLIPPIN'S TRENCHING, RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND PERSON ACCEPTEE INTO CLIENT'S CHAPTER 40		
	JBV	L320	A103	MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND	0.05	4.75
				0070	AA3246	

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				PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE	Hours	
				ON BEHALF OF BOMBARD MECHANICAL AND FLIPPIN'S TRENCHING.	0.05	4.75
11/08/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR FIVE STAR PLUMBING D/B/A SILVER STAR PLUMBING (TWO LOCATIONS) AND MESA MECHANICAL, RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND PERSON ACCEPTEE INTO CLIENT'S CHAPTER 40 MATRIX.	0.15	14.25
	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF FIVE STAR PLUMBING D/B/A SILVER STAR PLUMBING (TWO LOCATIONS) AND MESA MECHANICAL.	0.05	4.75
11/12/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARD FOR INSULPRO, INC., RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER	0.00	4.73
	JBV	L320	A103	40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE	0.05	4.75
	PCB	L230	A101	ON BEHALF OF INSULPRO, INC. PLAN AND PREPARE FOR TOMORROW'S STATUS HEARING (SWEEPS HEARING) RE: OUTLINE ISSUES TO ADDRESS WITH THE COURT GIVEN THE RECENT SETTING OF DATE FOR DISCOVERY AND THE LIKELY REQUEST OF THE HOA FOR A TRIAL DATE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.05	4.75
				SAME CASE - TOWER II).	0.10	18.50
11/13/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR DEAN ROOFING CO. (CAMERON LOCATION), INSULPRO PROJECTS (CORINTHIAN LOCATION), SOUTHERN NEVADA PAVING AND SIERRA GLASS & MIRROR, RE: VERIFYING WHY CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE, IN PREPARATION FOR INCORPORATING DATE SERVICE WAS ATTEMPTED AND REASONING WHY IT WAS UNSUCCESSFUL INTO		
	JBV	L320	A103	CLIENT'S CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE ATTEMPT AT SERVICES WAS MADE AND REASON CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE ON BEHALF OF DEAN ROOFING CO. (CAMERON LOCATION), INSULPRO PROJECTS (CORINTHIAN LOCATION), SOUTHERN NEVADA PAVING AND SIERRA GLASS &	0.10	9.50
				0071	AA3247	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

					Hours	
	PCB	L230	A109	MIRROR. APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.10	9.50
	PCB	L230	A109	OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (SEPARATE TRAVEL TIME; AS PER CARRIER BILLING GUIDELINE, TIME BILLED AT 1/2 OF REGULAR RATE; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH WITH OTHER FILE IN SAME CASE - TOWER	1.20	222.00
	PCB	L190	A108	II). COMMUNICATE (OTHER EXTERNAL) WITH CARRIER FOR FLIPPIN'S TRENCHING, ONE OF THE SUBCONTRACTORS THAT IS POTENTIALLY IMPLICATED BY THE SEWER ALLEGATION RE: DISCUSSION OF THE OVERALL STATUS OF THE CASE AND THE RECENT MOTION PRACTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.25	46.25 9.25
				,	0.05	9.25
11/14/2018		L120	A104	REVIEW/ANALYZE CORRESONDENCE FROM SILVER STAR PLUMBING, BLOCKED EMAIL CONTENT, PERTAINING TO CASE, IN ORDER TO FOLLOW UP WITH SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L120	A103	DRAFT/REVISE CORRESPONDENCE TO SILVER STAR PLUMBING, FOLLOW UP TO RECENT EMAIL AND REQUEST FOR CLARIFICATION (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
11/20/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR OLD CASTLE (DALLAS LOCATION), RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
	JBV	L320	A104	REVIEW/ANALYZE RETURNED ENVELOPES FROM FORD CONTRACTING AND TEXAS WALL SYSTEMS, RE: DETERMINING REASON FOR NON-SERVICE OF CHAPTER 40 DOCUMENTATION, IN PREPARATION FOR INCORPORATING DATE AND REASON FOR	0.03	4.73
	JBV	L320	A103	NON-SERVICE INTO CLIENT'S CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF FORD CONTRACTING, OLD CASTLE AND	0.10	9.50
				TEXAS WALL SYSTEMS.	0.05	4.75
11/27/2018	JBV	L320	A104	REVIEW/ANALYZE AND SUMMARIZE ORDER SETTING TRIAL AND PRE-TRIAL DEADLINES DATED NOVEMBER 20, 2018, RE: DETERMINING NEWLY INCLUDED DISCOVERY DEADLINES AND REQUIREMENTS, IN PREPARATION FOR ENSURING ALL ARE COMPLIED		
				0072	AA3248	

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				WITH ON BEHALF OF CLIENT.	Hours 0.10	9.50
11/28/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARD FOR F. RODGERS CORP. (NATIONAL DRIVE LOCATION), RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR F. RODGERS (VALLEY VIEW LOCATION), RE: DETERMINING WHY CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE, IN PREPARATION FOR INCORPORATING DATE SERVICE WAS ATTEMPTED	0.05	
	JBV	L320	A103	INTO CLIENT'S CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE	0.05	4.75
	JBV	L320	A104	ON BEHALF OF TWO F. RODGERS ENTITY LOCATIONS. REVIEW/ANALYZE AMENDED CASE AGENDA DATED NOVEMBER 6, 2018, RE: DETERMINING ADDITIONAL DISCOVERY DEADLINES AND REQUIREMENTS WITHIN, IN PREPARATION FOR ENSURING ALL ARE COMPLIED	0.05	4.75
	JBV	L320	A104	WITH ON BEHALF OF CLIENT. REVIEW/ANALYZE RESPONSE CORRESPONDENCE FROM FLIPPIN'S TRENCHING, RE: RESPONSE TO NRS 40.645 CONSTRUCTION DEFECT INFORMATION PROVIDED PREVIOUSLY BY CLIENT, IN PREPARATION FOR ENSURING RESPONSE TO FLIPPIN'S IS GIVEN TO QUESTIONS RAISED IN RESPONSE.	0.05 0.05	4.75 4.75
11/30/2018	JBV	L320	A104	REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER DATED NOVEMBER 29, 2018, RE: THE DECISION MADE ON CLIENT'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANTS' APRIL 5, 2018 AMENDED CLAIMS, IN PREPARATION FOR DETERMINING WHAT PORTIONS WERE GRANTED AND		
	DRG	L120	A104	WHICH WERE DENIED. REVIEW/ANALYZE FINDINGS OF FACT AND CONCLUSIONS OF LAW REGARDING OUR CLIENT'S MOTION FOR SUMMARY JUDGMENT, RE: ANALYSIS OF COURT'S RULING IN PREPARATION FOR DRAFTING REPLY TO PENDING MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05 0.20	4.75 33.00
12/02/2018	DRG	L250	A104	REVIEW/ANALYZE THE ASSOCIATION'S OPPOSITION TO MOTION FOR DECLARATORY RELIEF, RE: ANALYZED MOTION FOR ARGUMENTS PRESENTED, TO PREPARE STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH		
	DRG	L250	A104	TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE THE ASSOCIATION'S EXHIBITS TO ITS OPPOSITION TO MOTION FOR DECLARATORY	0.65 AA3249	107.25
				0073	11110217	

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				DELIES DE ANALYZED MOTION SOD ABOUNTAIN	Hours	
	DRG	L250	A104	RELIEF, RE: ANALYZED MOTION FOR ARGUMENTS PRESENTED, TO PREPARE STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE THE ASSOCIATION'S ERRATA TO ITS OPPOSITION TO MOTION FOR DECLARATORY RELIEF, RE: ANALYZED MOTION FOR ARGUMENTS PRESENTED, TO PREPARE STRATEGY FOR REPLY BRIEF IN	0.80	132.00
	DRG	L250	A104	SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE AND ATTACHED EXHIBITS, COMPARED WITH THOSE CONTAINED WITHIN OPPOSITION, TO PREPARE STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR	0.20	33.00
	DRG	L250	A104	DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (BEGIN) HOA CCR&S DECLARATION TO EVALUATE ARGUMENTS PRESENTED IN THE ASSOCIATION'S OPPOSITION RELATING TO THE DEFINITIONS AND PROVISIONS WITHIN THE DECLARATION, TO PREPARE STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR	0.60	99.00
				DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.90	148.50
12/03/2018	PCB	L240	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE UPCOMING HEARING ON THE DECLARATORY RELIEF MOTION DEALING WITH STANDING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	9.25
	PCB	L240	A104	REVIEW/ANALYZE (INITIAL) MAIN ARGUMENTS RAISED BY THE HOA IN OPPOSITION TO THE MOTION FOR DECLARATORY RELIEF		
	DRG	L250	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE FILES FROM PRIOR LITIGATION, BOX 2011-085, INCLUDING MJ DEAN SUBCONTRACTS, PROJECT SPECIFICATIONS, EQUIPMENT MANUALS, AND EXPERT REPORTS, TO LOCATE AND EVALUATE	0.20	37.00
	DRG	L250	A103	PLANS AND SPECIFICATIONS RELATING TO THE EIFS SYSTEM, IN PREPARATION FOR DEVELOPING STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE:	0.85	140.25
				0074	AA3250	8.25

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					Hours	
	DRG	L250	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE:	0.05	0.05
	DRG	L250	A104	REVIEW/ANALYZE (BEGIN) FILES FROM PRIOR LITIGATION, BOX 2011-074, ACCOUNTING RECORDS, CHANGE ORDERS, INVOICES, AND LIEN RELEASES, TO LOCATE AND EVALUATE DOCUMENT PROVING THAT TEXAS WALL SYSTEMS WAS PAID FOR ITS WORK RELATED TO WINDOW MANUFACTURING FOR THE PROJECT, IN PREPARATION FOR DEVELOPING STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH	0.05	8.25
	DRG	L250	A104	TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) FILES FROM PRIOR LITIGATION, BOX 2011-074, ACCOUNTING RECORDS, CHANGE ORDERS, INVOICES, AND LIEN RELEASES, TO LOCATE AND EVALUATE DOCUMENT PROVING THAT TEXAS WALL SYSTEMS WAS PAID FOR ITS WORK RELATED TO WINDOW MANUFACTURING FOR THE PROJECT, IN PREPARATION FOR DEVELOPING STRATEGY FOR REPLY BRIEF IN SUPPORT OF OUR MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.65	107.25 132.00
	DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.45	74.25
	DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW UP TELEPHONE CALL WITH EXPERT,	0.45	8.25
12/04/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL SENT TO F. RODGERS INSULATION (NATIONAL LOCATION), RE: DETERMINING WHY MAIL WAS RETURNED AS WELL AS CARD, IN PREPARATION FOR INCORPORATING DATE RETURNED AND REASONING		
	JBV	L320	A103	INTO CLIENT'S CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE CERTIFIED MAIL WAS RETURNED ON BEHALF OF F. RODGERS INSULATION (NATIONAL LOCATION) EVEN AFTER CARD	0.05	4.75
	JBV	L320	A104	WAS RETURNED. REVIEW/ANALYZE DISCLOSURES FROM PRIOR LITIGATION (DISC 1: D 0067000-68200), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.05	4.75
	DRG	L250	A104	REQUESTED. REVIEW/ANALYZE THE ASSOCIATION'S OPPOSITION TO 0075	0.95 AA3251	90.25

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				MOTION FOR DECLARATORY RELIEF AND COUNTERMOTION'S TO SAME, TO DRAFT STIPULATION AND ORDER FOR CONTINUANCE OF SAME (SPLIT WITH	Hours	
	DRG	L250	A103	TOWER II CASE PER ADJUSTER). DRAFT/REVISE STIPULATION AND ORDER FOR CONTINUANCE OF HEARING AND PRE-HEARING DATES FOR OPPOSITIONS AND REPLIES REGARDING MOTION FOR DECLARATORY RELIEF.	0.05	8.25 33.00
12/05/2018	PCB	L190	A103	DRAFT/REVISE (CONTINUE) PROPOSED STIPULATION FOR MOVING HEARING DATE ON THE DECLARATORY RELIEF MOTION AND THE HOA'S COUNTER-MOTIONS RE: ADDITIONAL LANGUAGE DEALING WITH THE BRIEFING SCHEDULE AND HOW THAT IMPACTS WHEN CERTAIN PLEADINGS MUST BE FILED BEFORE THE NEW HEARING DATE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER	0.20	33.00
	PCB	L250	A107	II). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: EXPLANATION OF THE PROPOSED NEW BRIEFING SCHEDULE FOR THE DECLARATORY RELIEF MOTION AND FOR THE HOA'S COUNTER-MOTIONS.	0.10	18.50 9.25
12/10/2018	DRG	L250	A104	REVIEW/ANALYZE NOTICE OF MINUTE ORDER, RE: EXTENSION OF HEARING ON MOTION FOR DECLARATORY RELIEF'S FILING DEADLINE, IN PREPARATION FOR DRAFTING REPLY TO SAME.	0.05	8.25
12/11/2018	PCB	L250	A104	REVIEW/ANALYZE (CONTINUE) THE RULING FROM JUDGE JOHNSON ON THE SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT DEALING WITH THE CHAPTER 40 NOTICE, IN ORDER TO ASSESS WHAT POSSIBLE GROUNDS THERE MAY BE FOR EITHER A MOTION FOR CLARIFICATION (ON THE SEWER AND FIRE BLOCKING ISSUES) AND/OR A MOTION FOR RECONSIDERATION (ON THE WINDOW ISSUE)(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN		
	PCB	L240	A104	SAME CASE - TOWER II). REVIEW/ANALYZE RECENT RULING ON STATUTE OF REPOSE FROM ANOTHER CASE (BRYNE) TO SEE HOW IT MIGHT BE UTILIZED IN THE PRESENT CASE GIVEN THE TIMING OF THE CHAPTER 40 NOTICE ISSUED BY THE HOA AND THE POTENTIAL FOR JUDGE JOHNSON TO FOLLOW THE RULING FROM THE OTHER CASE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER	0.20	37.00
	JBV	L320	A104	FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE DOCUMENTS FROM PRIOR LITIGATION (DRAWS 29-34: APPROXIMATELY 6828 PAGES), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING	0.30	55.50
				0076	AA3252	

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					Hours	
	JBV	L320	A104	RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (DRAWS 35-38, LOOSE DOCUMENTATION, LIEN RELEASES, CHANGE ORDERS: APPROXIMATELY 5841 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS	0.85	80.75
	JBV	L320	A104	PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER I: DRAWS 1-13: APPROXIMATELY 7279 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS	0.80	76.00
12/12/2018	PCB	L250	A104	PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE MINUTE ORDER FROM COURT	0.95	90.25
	ID\/	1220	A404	REGARDING THE MOTION FOR DECLARATORY RELIEF, AND REVISE PROPOSED STIPULATION AND ORDER FOR RESETTING THE HEARING AND THE BRIEFING SCHEDULE TO REFLECT THE COURT'S MINUTE ORDER AND THE AGREEMENTS BETWEEN THE PARTIES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.10	18.50
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER I: DRAWS 14-19: APPROXIMATELY 7742 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.05	00.05
	JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER I: DRAWS 20-28: APPROXIMATELY 6471 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN	0.95	90.25
				0077	AA3253	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

12/13/2018

				Hours	
			PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.90	85.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM		
			PRIOR LITIGATION (TOWER II: DRAWS 1-9: APPROXIMATELY 6326 PAGES OF DOCUMENTS), RE:		
			DETERMINING IF ANY DOCUMENTATION RELATING TO		
			TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS		
			PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING		
			TO MANUFACTURING OF THE WINDOWS, IN		
			PREPARATION FOR PROVIDING ATTORNEY, AS	0.00	05.50
JBV	L320	Δ104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM	0.90	85.50
3D V	L020	A10 4	PRIOR LITIGATION (TOWER II: DRAWS 10-12:		
			APPROXIMATELY 2911 PAGES OF DOCUMENTS), RE:		
			DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS		
			PURCHASE ORDERS, ACCOUNTING RECORDS,		
			PAYMENT DOCUMENTATION AND ANYTHING RELATING		
			TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS		
			REQUESTED.	0.55	52.25
DRG	L250	A104	REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT		
			ON THE ASSOCIATION'S AMENDED NOTICE OF CLAIMS, RE: ARGUMENTS PRESENTED, TO EVALUATE		
			WHETHER A MOTION FOR CLARIFICATION OR		
			RECONSIDERATION OF THE COURT'S ORDER		
			REGARDING SAME IS WARRANTED AND NECESSARY (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.30	49.50
DRG	L250	A104	REVIEW/ANALYZE EXHIBITS 1-4 OF MOTION FOR	0.00	40.00
			SUMMARY JUDGMENT ON THE ASSOCIATION'S		
			AMENDED NOTICE OF CLAIMS, RE: DOCUMENTS SUPPORTING ARGUMENTS PRESENTED OUR MOTION		
			FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S		
			AMENDED NOTICE, TO EVALUATE WHETHER A MOTION		
			FOR CLARIFICATION OR RECONSIDERATION OF THE COURT'S ORDER REGARDING SAME IS WARRANTED		
			AND NECESSARY (SPLIT WITH TOWER II CASE PER		
			ADJUSTER)	0.40	66.00
DRG	L250	A104	REVIEW/ANALYZE COURT'S FINDINGS OF FACT AND CONCLUSIONS OF LAW ON PRIOR MOTION FOR		
			SUMMARY JUDGMENT ON THE ASSOCIATION'S NOTICE		
			OF CLAIMS, RE: THE COURT'S PRIOR REASONING ON		
			SIMILAR ARGUMENTS, TO EVALUATE WHETHER A MOTION FOR CLARIFICATION OR RECONSIDERATION		
			OF THE COURT'S ORDER REGARDING SAME IS		
			WARRANTED AND NECESSARY (SPLIT WITH TOWER II	0.05	
			CASE PER ADJUSTER)	0.35	57.75
JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR		
			X-TREME X-CAVATION, RE: DETERMINING WHY CHAPTER 40 CORRESPONDENCE WAS		
			0078	AA3254	
			00.0		

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UNDELIVERABLE, IN PREPARATION FOR INCORPORATING DATE SERVICE WAS ATTEMPTED INTO CLIENTS CHAPTER 40 MATRIX.					Hours	
JBV L320				· · · · · · · · · · · · · · · · · · ·	riodio	
ON BEHALF OF X-TREME X-CAVATION. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 13-18: APPROXIMATELY 6080 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 19-25: APPROXIMATELY 5510 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR THE	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40	0.05	4.75
APPROXIMATELY 6080 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION, TO MANYTHING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PROVIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTS, RE: DETERMINING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS, RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIER RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING	JBV	L320	A104	ON BEHALF OF X-TREME X-CAVATION.	0.05	4.75
PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 19-25: APPROXIMATELY 5510 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4283 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 30, MJ DEAN CHANGE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DETERMINING IF ANY DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				PRIOR LITIGATION (TOWER II: DRAWS 13-18: APPROXIMATELY 6080 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO		
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DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR	JBV	L320	A104	PRIOR LITIGATION (TOWER II: DRAWS 19-25:		
PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.55 52.25 DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS		
REQUESTED: 0.85 80.75 JBV L320 A104 REVIEW/MANLYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.70 66.50 JBV L320 A104 REVIEW/MANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.55 52.25 DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				PAYMENT DOCUMENTATION AND ANYTHING RELATING		
PRIOR LITIGATION (TOWER II: DRAWS 26-29: APPROXIMATELY 4263 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS, RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR	ID\/	1 200	A404	REQUESTED.	0.85	80.75
TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.70 66.50 JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.55 52.25 DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR	JBV	L320	A104	PRIOR LITIGATION (TOWER II: DRAWS 26-29:		
PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.70 66.50 JBV L320 A104 REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. 0.55 52.25 DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS		
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PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF DRAW 13 AND UNCONDITIONAL LIEN RELEASES: APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR	JBV	1320	Δ104	REQUESTED.	0.70	66.50
APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR	ODV	LOZO	7,104	PRIOR LITIGATION (TOWER II: DRAW 30, MJ DEAN CHANGE ORDERS, POSSIBLE CONTINUATION OF		
TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				APPROXIMATELY 3277 PAGES OF DOCUMENTS), RE:		
TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS,		
DRG L250 A104 REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR THE ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR				TO MANUFACTURING OF THE WINDOWS, IN		
TO CONTINUE HEARING DATE FOR OUR MOTION FOR	DRG	L250	A104	REVIEW/ANALYZE CORRESPONDENCE FROM	0.55	52.25
					AA3255	

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12/14/2018

			DECLARATORY RELIEF, IN PREPARATION FOR	Hours	
DRG	L250	A104	DRAFTING REPLY TO SAME. REVIEW/ANALYZE SUPPLEMENTAL CORRESPONDENCE FROM COUNSEL FOR THE	0.05	8.25
			ASSOCIATION, RE: STIPULATION TO CONTINUE HEARING DATE FOR OUR MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING REPLY TO		
DRG	L250	A104	SAME. REVIEW/ANALYZE EXHIBITS 6-8 OF MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S AMENDED NOTICE OF CLAIMS, RE: DOCUMENTS	0.05	8.25
			SUPPORTING ARGUMENTS PRESENTED OUR MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S AMENDED NOTICE, TO EVALUATE WHETHER A MOTION		
			FOR CLARIFICATION OR RECONSIDERATION OF THE COURT'S ORDER REGARDING SAME IS WARRANTED AND NECESSARY (SPLIT WITH TOWER II CASE PER		
DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE THE ASSOCIATION'S OPPOSITION TO OUR MOTION FOR SUMMARY JUDGMENT ON THE	0.35	57.75
			ASSOCIATION'S AMENDED NOTICE OF CLAIMS, RE: ARGUMENTS PRESENTED, TO EVALUATE WHETHER A MOTION FOR CLARIFICATION OR RECONSIDERATION		
			OF THE COURT'S ORDER REGARDING SAME IS WARRANTED AND NECESSARY (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.60	99.00
DRG	L250	A104	REVIEW/ANALYZE EXHIBITS TO THE ASSOCIATION'S OPPOSITION TO OUR MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S AMENDED NOTICE OF CLAIMS, RE: DOCUMENTS SUPPORTING		
			ARGUMENTS PRESENTED OUR MOTION FOR SUMMARY JUDGMENT ON THE ASSOCIATION'S AMENDED NOTICE, TO EVALUATE WHETHER A MOTION FOR CLARIFICATION OR RECONSIDERATION OF THE		
			COURT'S ORDER REGARDING SAME IS WARRANTED AND NECESSARY (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L250	A104			
			ARGUMENTS PRESENTED, TO EVALUATE WHETHER A MOTION FOR CLARIFICATION OR RECONSIDERATION OF THE COURT'S ORDER REGARDING SAME IS		
			WARRANTED AND NECESSARY (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.40	66.00
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 10-15: APPROXIMATELY 5490 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS		
			PURCHASE ORDERS, ACCOUNTING RECORDS, 0080	AA3256	

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				Hours	
JBV	L320	A104	PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 16-20: APPROXIMATELY 4409 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO	0.70	66.50
JBV	L320	A104	TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 21-26(A): APPROXIMATELY 5308 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS	0.55	52.25
CSW	L120	A104	PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE RECENT NEVADA CASE LAW AND STATUTES, RE: STANDARD OF REVIEW OF MOTIONS FOR RECONSIDERATION, IN PREPARATION FOR DRAFTING MOTION FOR RECONSIDERATION OF TRIAL JUDGE'S DECISION REGARDING MOTION SUMMARY	0.65	61.75
CSW	L120	A103	JUDGMENT ON THE ASSOCIATION'S AMENDED NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) MOTION FOR RECONSIDERATION OF TRIAL JUDGE'S RULING REGARDING MOTION FOR SUMMARY JUDGMENT ON	0.20	33.00
CSW	L120	A103	THE ASSOCIATION'S AMENDED NOTICE, RE: STANDARD OF REVIEW FOR MOTION DRAFT/REVISE (CONTINUE) MOTION FOR RECONSIDERATION OF TRIAL JUDGE'S RULING IN	0.65	107.25
DRG	L340	A108	DEFENSE MOTION FOR SUMMARY JUDGMENT, RE: STANDARD OF REVIEW FOR MOTION COMMUNICATE (OTHER EXTERNAL) VOICEMAIL FROM EXPERT, SIMON LOADSMAN, RE:	0.30	49.50
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW UP TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN,	0.05	8.25
			RE: (SPLIT WITH TOWER II CASE PER ADJUSTER) 0081	AA3257	33.00

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					Hours	
	DRG	L250	A104	REVIEW/ANALYZE ASSOCIATION'S ORIGINAL CHAPTER 40 NOTICE AND EXHIBITS THERETO, TO EVALUATE WHETHER THE HEAD FLASHINGS ARE CONSIDERED NEW ISSUES, TO EVALUATE THE NECESSITY AND SUCCESS RATE OF FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED NOTICE OF CLAIMS (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.60	99.00
	DRG	L250	A104	REVIEW/ANALYZE SIERRA GLASS PLANS AND SHOP DRAWINGS (APPROX 71 PLANS), TO EVALUATE THE POTENTIAL FOR FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED NOTICE OF CLAIMS (SPLIT WITH TOWER II CASE PER		
	DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE AAMA GLOSSARY OF TERMS AND DEFINITIONS OF PERTINENT ASPECTS OF HEAD FLASHINGS, SILL FLASHINGS AND OTHER WINDOW ASSEMBLY COMPONENTS, TO EVALUATE THE POTENTIAL FOR FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED NOTICE OF CLAIMS (SPLIT WITH TOWER II CASE PER	0.65	107.25 33.00
	DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE (BEGIN) FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER ON MOTION FOR SUMMARY JUDGMENT REGARDING THE AMENDED NOTICE, RE: ANALYZED COURT'S REASONING AND BASES FOR ITS DECISIONS ON THE MOTION, TO EVALUATE THE POTENTIAL FOR FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.70	115.50
12/15/2018	PCB	L250	A104	REVIEW/ANALYZE (CONTINUE) POSSIBLE ARGUMENTS TO SUPPORT MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON CERTAIN ASPECTS OF THE SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE, AND MAKE NOTES ON THE PROS AND CONS OF RAISING THE VARIOUS ARGUMENTS NOW AS OPPOSED TO LATER IN THE CASE (AS PER CARRIER DIRECTIVE, TIME SPLIT		
	DRG	L340	A103	WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY ROBBINS, RE: (SPLIT WITH TOWER II CASE PER	0.15	27.75
	DRG	L340	A104	ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
	DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT,	0.05 AA3258	8.25
				0082	11113230	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

12/16/2018

			OUELLY DODDING DE	Hours	
DRG	L250	A108	SHELLY ROBBINS, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL	0.05	8.25
	L250		WITH EXPERT, (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) MEMORANDUM TO FILE, RE:	0.35	57.75
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) HEARING TRANSCRIPT FROM OCTOBER 2, 2018 HEARING, RE: ANALYZED COURT'S ARGUMENTS RAISED IN COURT AND JUDGE'S RESPONSES, TO EVALUATE THE POTENTIAL FOR	0.60	99.00
DRG	L250	A104	FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) HEARING TRANSCRIPT FROM OCTOBER 2, 2018 HEARING, RE: ANALYZED COURT'S ARGUMENTS RAISED IN COURT AND JUDGE'S RESPONSES, TO EVALUATE THE POTENTIAL FOR	0.65	107.25
DRG	L250	A104	FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AB 125 CHANGES TO CHAPTER 40, TO EVALUATE THE COURT'S REASONING COMPARED WITH THE CLEAR STATUTORY LANGUAGE REGARDING REQUIREMENTS OF NOTICE, TO EVALUATE THE	0.60	99.00
DRG	L250	A103	POTENTIAL FOR FILING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMORANDUM TO FILE, RE:	0.40	66.00
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.65	107.25
РСВ	L250	A101	PLAN AND PREPARE (CONTINUE) FOR MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON CERTAIN ASPECTS OF THE SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: CONTINUE TO OUTLINE THE THREE POTENTIAL ARGUMENTS DEALING WITH NEW FACTS AND THE ASPECTS OF THE RULING THAT ARGUABLY ARE CLEARLY ERRONEOUS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	AA3259	
			0083	AA3433	

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DRG	L250	A104	SAME CASE - TOWER II). REVIEW/ANALYZE (BEGIN) THE ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, TO EVALUATE THE ARGUMENTS PRESENTED THEREIN, TO DETERMINE HOW THEY AFFECT OUR	Hours 0.40	74.00
DRG	L250	A104	REASONING AND ARGUMENTS, IN PREPARATION FOR DRAFTING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) THE ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF AND EXHIBITS THERETO, TO EVALUATE THE ARGUMENTS AND DOCUMENTS PRESENTED THEREIN, TO DETERMINE HOW THEY AFFECT OUR REASONING AND ARGUMENTS, IN PREPARATION FOR DRAFTING A	0.40	66.00
DRG	L250	A104	MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TRAINING MANUAL UTILIZED BY THE ASSOCIATION'S EXPERT, TO EVALUATE PROVISIONS RELATED TO HEAD FLASHINGS COMPARED WITH MANUFACTURER'S RECOMMENDATIONS, IN PREPARATION FOR DRAFTING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR	0.55	90.75
DRG	L340	A104	MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.05	8.25
DRG	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) MOTION FOR RECONSIDERATION OF THE COURT'S RULING	0.05	8.25
DRG	L250	A103	REGARDING OUR MOTION FOR SUMMARY JUDGMENT ON THE AMENDED NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR RECONSIDERATION OF THE COURT'S RULING	0.95	156.75
			REGARDING OUR MOTION FOR SUMMARY JUDGMENT 0084	AA3260	

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					Harrina	
				ON THE AMENDED NOTICE (SPLIT WITH TOWER II	Hours	
	DDC	1.240	A 1 O 1	CASE PER ADJUSTER)	0.90	148.50
	DKG	L340	A 104	REVIEW/ANALYZE SUPPLEMENTAL CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS,		
				RE: RESPONSE TO INQUIRIES REGARDING SPANDREL		
				GLASS AND PRESENCE OF SILL PANS. (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L340	A104	REVIEW/ANALYZE PHOTOGRAPH OF UNIT 300 DT'S, TO	0.00	0.20
				CONFIRM PRESENCE OF SILL PANS AT THE PROJECT. (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
					0.00	0.20
12/17/2018	PCB	L240	A103	DRAFT/REVISE WORK ON MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON THE		
				SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT		
				THAT PERTAINED TO THE AMENDED CHAPTER 40 NOTICE RE: WORK ON ALL THREE ASPECTS OF THE		
				MOTION, INCLUDING ADDRESSING THE NEW		
				EVIDENCE, THE CLEARLY ERRONEOUS ASPECTS OF		
				THE RULING, THE ADMISSION BY THE HOA'S EXPERT, THE CONFLICTING EXPERT REPORTS, AND THE		
				DIFFERENCE BETWEEN "FLASHING" AND		
				"DRAINAGE"(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	1.70	314.50
	DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT,		
				SHELLY ROBBINS, RE:		
				(SPLIT WITH TOWER II CASE PER	0.05	0.05
	DRG	L340	A103	ADJUSTER) DRAFT/REVISE CORRESPONDENCE FROM EXPERT,	0.05	8.25
				SHELLY ROBBINS, RE:		
				(SPLIT WITH TOWER II CASE PER		
				ADJUSTER)	0.05	8.25
	DRG	L250	A104	REVIEW/ANALYZE FLOOR PLANS AT THE TOWER UNITS, PROVIDED BY EXPERT, CONFIRMING		
				PRESENCE OF SPANDREL GLASS AT THE PROJECT, IN		
				PREPARATION FOR DRAFTING A MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON OUR		
				MOTION FOR SUMMARY JUDGMENT ON THE AMENDED		
				CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER	0.30	49.50
	DRG	L340	A108	ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE	0.30	49.50
				CONVERSATION WITH EXPERT, SHELLY ROBBINS, RE:		
				(SPLIT WITH TOWER II CASE PER		
				ADJUSTER)	0.10	16.50
	DRG	L340	A109	APPEAR FOR/ATTEND MEETING WITH FENESTRATION EXPERT, RE:		
					A A 2261	
				0085	AA3261	

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12/18/2018

				Hours	
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE AFFIDAVIT OF EXPERT, SIMON LOADSMAN, IN SUPPORT OF MOTION FOR RECONSIDERATION OF THE COURT'S RULING REGARDING OUR MOTION FOR SUMMARY JUDGMENT	1.30	214.50
DRG	L250	A103	ON THE AMENDED NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR RECONSIDERATION OF THE COURT'S RULING REGARDING OUR MOTION FOR SUMMARY JUDGMENT	0.30	49.50
DRG	L340	A103	ON THE AMENDED NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY ROBBINS, RE:	0.85	140.25
JBV	L320	A104	PLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II: DRAWS 26B-29: APPROXIMATELY 3557 PAGES OF DOCUMENTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO	0.05	8.25
			TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.55	52.25
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (MISC. DISC DOCUMENTATION SUCH AS CERTIFICATES OF OCCUPANCY, DEFENSE REPORTS, INSURANCE POLICIES, PLAINTIFF EXPERT REPORTS AND STATUS REPORTS), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE		
JBV	L320	A104	ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0052456-54500), RE:	0.55	52.25
			DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.45	42.75
PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH 0086	AA3262	T.L.1 U

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12/19/2018

			COUNSEL FOR SOUTHERN NEVADA PAVING (ONE OF THE SUBCONTRACTORS POTENTIALLY IMPLICATED BY THE "SEWER PROBLEM") RE: DISCUSSION OF THE COURT'S RECENT ORDER ON THE MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER	Hours	
PCB	L250	A107	40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR SOUTHERN NEVADA PAVING (ONE OF THE SUBCONTRACTORS POTENTIALLY IMPLICATED BY THE "SEWER PROBLEM") RE: CLARIFICATION OF THE OVERALL IMPACT OF THE COURT'S RECENT ORDER ON THE MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.05	9.25
DRG	L250	A104	CASE - TOWER II). REVIEW/ANALYZE (CONTINUE) STIPULATION AND ORDER FOR EXTENSION OF HEARING DEADLINES ON MOTION FOR DECLARATORY RELIEF, RE: IN PREPARATION FOR SERVING TO FILING WITH THE	0.05	9.25
DRG	L250	A104	COURT (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL, FRANCIS LYNCH, RE: STIPULATION AND ORDER FOR EXTENSION OF HEARING DEADLINES ON MOTION FOR DECLARATORY	0.10	16.50
DRG	L250	A104	RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL, SCOTT WILLIAMS, RE: STIPULATION AND ORDER FOR EXTENSION OF HEARING DEADLINES ON MOTION FOR DECLARATORY	0.05	8.25
DRG	L250	A103	RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) STIPULATION AND ORDER FOR EXTENSION OF HEARING DEADLINES ON MOTION FOR DECLARATORY RELIEF, RE: IN PREPARATION FOR SERVING TO ALL COUNSEL (SPLIT WITH TOWER II	0.05	8.25
DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) HEARING TRANSCRIPT FROM OCTOBER 2, 2018 HEARING ON MOTION FOR SUMMARY JUDGMENT REGARDING AMENDED NOTICE OF CLAIMS, IN PREPARATION FOR DRAFTING A REPLY	0.10	16.50
JBV	L320	A104	TO SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0054501-56200), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.45	74.25
JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM 0087	0.55 AA3263	52.25

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					Hours	
				PRIOR LITIGATION (D 0056201-58300), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.45	42.75
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0058301-60400), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.55	52.25
				NEQUEUTED.	0.55	32.23
12/20/2018	DRG	L120	A104	REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL, FRANCIS LYNCH, RE: UPDATED EXECUTED COPY OF STIPULATION TO EXTEND HEARING DATE FOR MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR FILING SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L120	A104	REVIEW/ANALYZE ASSOCIATION'S ORIGINAL CHAPTER 40 NOTICE TO OUR CLIENTS IN ORDER TO PREPARE A RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER		
	DRG	L120	A104	ADJUSTER) REVIEW/ANALYZE OUR RESPONSES AND OBJECTIONS TO THE ASSOCIATION'S ORIGINAL CHAPTER 40 NOTICE TO OUR CLIENTS, IN ORDER TO PREPARE A RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER	0.10	16.50
	DRG	L120	A104	ADJUSTER) REVIEW/ANALYZE THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE TO OUR CLIENTS, IN ORDER TO PREPARE A RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II	0.10	16.50
	DRG	L120	A104	CASE PER ADJUSTER) REVIEW/ANALYZE BANKRUPTCY FILINGS ON PANORAMA TOWER II, TO EVALUATE PROCEDURAL STATUS OF THAT CASE, IN ORDER TO PREPARE A RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER	0.10	16.50
	DRG	L120	A104	ADJUSTER) REVIEW/ANALYZE NRS CHAPTER 40 POST AB 125, RE: NRS 40.615, DEFINITION OF CONSTRUCTION DEFECT, IN ORDER TO EVALUATE THE REQUISITE DETERMINATION NEEDED TO CLASSIFY A CONDITION AS A CONSTRUCTIONAL DEFECT, IN PREPARATION FOR DRAFTING A RESPONSE TO THE ASSOCIATION'S	0.15	24.75
				0088	AA3264	

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					Hours	
	DRG	L120	A103	AMENDED CHAPTER 40 NOTICE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) RESPONSE TO THE	0.10	16.50
	5	2.20	71.00	ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, OBJECTIONS, RESPONSES AND ARGUMENTS AS TO WHY WE DECLINE TO REPAIR CONDITIONS ALLEGED.	0.90	148.50
12/26/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0060401-62500), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.60	57.00
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0062501-64000), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.55	52.25
12/27/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0064001-65800), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS		
	JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0065801-67000), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.55	52.25
	JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0067001-68985), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.40 AA3265	38.00
				0089	AAJZUJ	

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	JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0068986-70599), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS	Hours 0.60	57.00
	PCB	L250	A104	PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE LATEST DRAFT OF PROPOSED RESPONSE TO AMENDED CHAPTER 40 NOTICE (AS PREPARED BY DEVIN GIFFORD) AND IDENTIFY ADDITIONAL AREAS THAT NEED TO BE ADDRESSED WITH REGARD TO STATUTE OF REPOSE AND THE APPLICATION OF JUDGE JOHNSON'S RULING ON THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER	0.55	52.25
				DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.20	37.00
12/28/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0070600-72100), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS		
	JBV	L320	A104	REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0072101-73400), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS	0.55	52.25
	PCB	L250	A103	REQUESTED. DRAFT/REVISE (CONTINUE) RESPONSE TO AMENDED CHAPTER 40 NOTICE RE: ADDITIONAL WORK ON TIMING OF NOTICE, STATUTE OF REPOSE ISSUES, AND WHETHER THE TIMING FOR FILING A COMPLAINT WAS TOLLED BY THE ISSUANCE OF A CHAPTER 40 NOTICE ON THE LAST DAY OF THE TOLLING PERIOD (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.45	42.75
	DRG	L120	A104	SAME CASE - TOWER II). REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT IN BYRNE V SUNRIDGE BUILDERS CASE, RECENT NEVADA DISTRICT COURT CASE WITH COURT JUDGMENT IN OUR FAVOR, IN ORDER TO APPLY SAME ARGUMENTS IN OUR RESPONSE TO THE	0.25	46.25
				ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN 0090	AA3266	

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				Hours	
DRG	L120	A104	PREPARATION FOR DRAFTING SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE OPPOSITION TO MOTION FOR SUMMARY JUDGMENT IN BYRNE V SUNRIDGE	0.60	99.00
DRG	L120	A104	BUILDERS CASE, RECENT NEVADA DISTRICT COURT CASE WITH COURT JUDGMENT IN OUR FAVOR, IN ORDER TO APPLY SAME ARGUMENTS IN OUR RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN PREPARATION FOR DRAFTING SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE REPLY BRIEF TO MOTION FOR SUMMARY JUDGMENT IN BYRNE V SUNRIDGE	0.40	66.00
DRG	L120	A104	BUILDERS CASE, RECENT NEVADA DISTRICT COURT CASE WITH COURT JUDGMENT IN OUR FAVOR, IN ORDER TO APPLY SAME ARGUMENTS IN OUR RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN PREPARATION FOR DRAFTING SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE COURT'S FINDINGS OF FACT AND CONCLUSIONS OF LAW REGARDING MOTION FOR SUMMARY JUDGMENT IN BYRNE V SUNRIDGE	0.45	74.25
			BUILDERS CASE, RECENT NEVADA DISTRICT COURT CASE WITH COURT JUDGMENT IN OUR FAVOR, IN ORDER TO APPLY SAME ARGUMENTS IN OUR RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN PREPARATION FOR DRAFTING		
DRG	L120	A103	SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, OBJECTIONS, RESPONSES AND ARGUMENTS AS TO WHY WE DECLINE TO REPAIR CONDITIONS ALLEGED, INCLUDING ADDITIONAL ARGUMENT AS TO WHY THE ASSOCIATION'S CLAIMS ARE TIME-BARRED DUE TO	0.20	33.00
DRG	L120	A103	STATUTE OF REPOSE. DRAFT/REVISE (CONTINUE) RESPONSE TO THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, OBJECTIONS, RESPONSES AND ARGUMENTS AS TO WHY WE DECLINE TO REPAIR CONDITIONS ALLEGED, INCLUDING ADDITIONAL ARGUMENT AS TO WHY THE	0.55	90.75
LJG	L120	A104	ASSOCIATION'S CLAIMS ARE TIME-BARRED DUE TO STATUTE OF REPOSE. REVIEW/ANALYZE THE HOA'S CHAPTER 40 NOTICE AND ATTACHED EXHIBITS, IN PREPARATION FOR	0.60	99.00
LJG	L120	A104	CONTINUING OUR CLIENT'S CHAPTER 40 RESPONSE. REVIEW/ANALYZE PRIOR MOTION PRACTICE AND PRIOR PROCEDURAL RULINGS MADE BY THE COURT,	0.40	74.00
LJG	L120	A103	,	0.35	64.75
			RESPONSE, RE: REVISED AND SUPPLEMENTED ALL LEGAL AND FACTUAL ARGUMENTS.	0.25	46.25
				۸ ۸ 2 2 6 7	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

08/06/2018

					Hours	
12/30/2018	PCB	L120	A104	REVIEW/ANALYZE VARIOUS COURT ORDERS, SPECIAL MASTER ORDERS AND ONLINE SOURCES FOR LEGISLATURE "BILL DRAFT REQUESTS" ON CONSTRUCTION DEFECTS IN ORDER TO COMPILE INFORMATION TO ADDRESS IN A SUPPLEMENTAL STATUS REPORT TO THE CARRIERS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.40	74.00
	PCB	L120	A103	DRAFT/REVISE (BEGIN) SUPPLEMENTAL STATUS REPORT	[
					0.85	157.25
12/31/2018	PCB	L120	A103	DRAFT/REVISE (FINALIZE) SUPPLEMENTAL STATUS REPORT RE:	I	
	РСВ	L120	A103	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE EMAIL TO CARRIERS RE:	0.15	27.75
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.05	0.25
				CASE - TOWER II). For Current Services Rendered	$\frac{0.05}{142.55}$	9.25 21,057.75
					112.00	21,007.70
Timekeepe	er			Recapitulation <u>Title</u> Hours	Rate	Total
Peter C. B				PARTNER 24.15	\$185.00	\$4,467.75
Lucian J. C				PARTNER 1.00	185.00	185.00
Jeffrey W. Jennifer Ve				PARTNER 10.35 PARALEGAL 43.80	175.00 95.00	1,811.25 4,161.00
Devin R. G	Sifford			ASSOCIATE 62.05	165.00	10,238.25
Crystal Wil		_		PARALEGAL 0.05	95.00	4.75
Cyrus S. V	vriillakei			ASSOCIATE 1.15	165.00	189.75

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

			HALLIER, PANORAMA TOWER'S I, LLC, PANORAMA TOWER'S I MEZZ, LLC, AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON	
09/01/2018	L100	E112	DEFENDANT/COUNTERCLAIM PANORAMA TOWER CONDOMINIUM UNIT OWNERS ASSOCIATES APRIL 5,2018 AMENDED NOTICE OF CLAIMS) COURT SERVICE (9999) AMERICAN LEGAL SERVICES	104.75
			NEVADA (INVOICE #37017139 COURTESY COPY OF MOTION FOR SUMMARY JUDGMENT - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 08/30/2018)	2.87
09/04/2018	L100	E112	ODYSSEY (STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORMA TOWERS I MEZZ, LLC AND M.J DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMAR JUDGMENT ON	
			DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNER'S ASSOCIATION'S APRIL 5, 2018 AMENDED NOTICE OF CLAIMS)	1.75
09/05/2018	L100	E112	ODYSSEY (NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS, I, LLC, PANORMA TOWERS I MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON	
09/25/2018	L100	F112	DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS ASSOCIATION'S APRIL 5,2018 AMENDED NOTICE OF CLAIMS) ODYSSEY (PLAINTIFFS/COUNTER-DEFENDANTS LAURENT	1.75
03/23/2010	2100		HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC, AND M.J. DEAN CONSTRUCTION, INC.'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S APRIL 5,	4.75
09/30/2018	L100	E112	2018 AMENDED NOTICE OF CLAIMS) ATTORNEY SERVICES (9999) AMERICAN LEGAL SERVICES NEVADA (INVOICE NO. 37017594/DELIVER COURTESY COPY OF MOTION FOR SUMMARY JUDGMENT TO DEPARTMENT	1.75
10/02/2018	L100	E109	22/ESRVICES PROVIDED ON 09/26/18) PARKING (134) PETER C. BROWN (SPLIT BETWEEN 1287.551 AND 1287.558)	2.87 6.00
10/22/2018 10/22/2018	L100 L100		ODYSSEY (CÉRTIFICATE OF SERVICE) ODYSSEY (APPENDIX TO PLAINTIFFS/COUNTER-DEFENDANTS' MOTION FOR DECLARATORY RELIEF REGARDING STANDING-VOLUME I	1.75
10/22/2018	L100	E112	OF III) ODYSSEY (PLAINTIFFS/COUNTER-DEFENDANTS' MOTION	1.75
11/13/2018 12/14/2018	L100 L100		FOR DECLARATORY RELIEF REGARDING STANDING) LOCAL TRAVEL (134) PETER C. BROWN (PARKING) ODYSSEY (PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC AND MJ DEAN CONSTRUCTION, INC.'S MOTION FOR RECONSIDERATION OF THEIR MOTION FOR SUMMARY JUDGMENT DEFENDANT/COUNTER-CLAIMANT PANORAMA	1.75 8.00

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AA3270

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

12/17/2	TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S APRIL 5, 2018 AMENDED NOTICE OF CLAIMS) 7/2018 L100 E112 ODYSSEY (PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORAMA TOWERS I MEZZ, LLC AND MJ DEAN CONSTRUCTION, INC.'S MOTION FOR RECONSIDERATION OF THEIR MOTION FOR SUMMARY JUDGMENT DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S APRIL 5, 2018 AMENDED NOTICE OF CLAIMS) 1/2018 L100 E102 OUTSIDE PRINTING (1327) CLARK COUNTY TREASURER								
12/21/2	2010	LIOU	E102		T FOR OCTOBE			.	$\frac{265.30}{403.79}$
				Total Current	Work				21,461.54
				Previous Bala	nce				\$8,460.32
				Balance Due					\$29,921.86
		<u>0-30</u> 21,461.54		31-60 0.00	Past Due Am 61-90 0.00	ounts <u>91-12</u> 0.0	_	<u>181+</u> 1,065.05	
					Split Billing Sur		Expenses	Advances	Total
	3 INSURAN Oallas AGL C			wer I ma Tower II	21,08	<u>Fees</u> 86.01 57.75	395.81 395.79	0.00 0.00	21,481.82 21,453.54
					42,14	43.76	791.60	0.00	42,935.36
					Task Code Su	mmarv			
L100 L110 L120 L130 L150 L150	L110 FACT INVESTIGATION/DEVELOPMENT 27.75 L120 ANALYSIS/STRATEGY 3160.25 L130 EXPERTS/CONSULTANTS 120.25 L150 BUDGETING 35.00								Expenses 403.79 0.00 0.00 0.00 0.00 0.00
L100	CASE AS	SESSMEN	T, DEVE	ELOPMENT AN	D ADMINISTRA	ΓΙΟΝ		3,472.75	403.79
L230 L240 L250	0 DISPOSITIVE MOTIONS 3645.50							0.00 0.00 0.00	
L200	PRE-TRIA	L PLEADII	NGS AN	D MOTIONS				11,469.25	0.00
L320 L340 L390 L300	EXPERT [NT PRODU DISCOVER ISCOVER	RY					4165.75 1783.50 166.50 6,115.75	$0.00 \\ 0.00 \\ 0.00 \\ \hline 0.00$
L300	PIOCOVE	IXI						0,110.70	0.00

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ESIS Dallas AGL Claims

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

0095

Final Statement Run Totals 12/31/2018

 Statements Printed:
 1

 Hours:
 142.55

 Fees:
 21,057.75

 Expenses:
 403.79

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 9200 Oakdale Avenue, 8th Floor, Chatsworth, CA 91311, USA Page: 1 November 30, 2018 Account No: 1287-5511V Statement No: 14

Attn: Jeff Ganzer

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

<u>Fees</u>

00/00/0040	IVACO	1.400	1101	DEVIEWANALYZE CORRECCIONDENOE/NOTES DE CASE	Hours	
09/06/2018	JWS			REVIEW/ANALYZE CORRESPONDENCE/NOTES RE: CASE ACTIVITY IN ORDER TO ASSIST WITH FURTHER CASE HANDLING/DEFENSE STRATEGY. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S	0.10	17.50
				EXPERT, SHELLY ROBBINS RE:	0.05	4.75
09/07/2018	JWS	L120	A101	PLAN AND PREPARE (BEGIN) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT, TIME SPLIT WITH TWO		
	JWS	L120	A108	CASE. COMMUNICATE (OTHER EXTERNAL) MEET AND CONFER WITH EXPERT,	0.75	131.25
				TIME TO BE SPLIT WITH TOWER TWO CASE.	0.10	17.50
09/14/2018	JWS			REVIEW/ANALYZE (BEGIN) AND OUTLINE OPPOSITION TO BUILDERS MOTION FOR SUMMARY JUDGMENT. SPLIT TIME WITH TOWER TWO CASE.	0.80	140.00
	JWS	L240	A103	DRAFT/REVISE ARGUMENT SUMMARY RE: BUILDER'S MOTION FOR SUMMARY JUDGMENT, ASSOCIATIONS OPPOSITION, AND POTENTIAL ARGUMENTS FOR UTILIZATION IN REPLY BRIEF. SPLIT TIME WITH TOWER TWO CASE.	0.70	122.50
09/18/2018	JWS	L240	A101	PLAN AND PREPARE FOR (CONTINUE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY OF JUDGMENT. FORMULATION OF ARGUMENTS BASED ON REVIEW OF	0.05	440.75
				OPPOSITION.	0.65	113.75
09/20/2018	JWS	L120	A104	REVIEW/ANALYZE (LEGAL RESEARCH-MULTIPLE SOURCES) RE: ASSOCIATIONS OPPOSITION, RE: STATUTORY INTERPRETATION, BAR TO CLAIMS BASED ON INITIAL SUIT, AND DEFENSES TO SAME. TIME SPLIT WITH TOWER TWO CASE.	0.85	148.75
09/21/2018	JWS	L120	A104	REVIEW/ANALYZE (CONTINUE- LEGAL RESEARCH-MULTIPLE SOURCES) RE: ASSOCIATIONS OPPOSITION, RE: STATUTORY INTERPRETATION, BAR TO CLAIMS BASED ON INITIAL SUIT, AND DEFENSES TO SAME. TIME SPLIT WITH TOWER TWO		

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

					Hours	
	JWS	L240	A103	CASE. DRAFT/REVISE (BEGIN) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGEMENT, INTRODUCTION, FACTS, AND	1.00	175.00
	JWS	L240	A104	SUMMARY OF ARGUMENTS RAISED BY ASSOCIATION. REVIEW/ANALYZE AND COMPARE EXPERT AFFIDAVITS, SUMMARY OF CLAIMS, INSPECTION NOTES, AND RELATED MATERIAL RE: ALLEGED UNDISPUTED FACTS AS OUTLINED IN	0.80	140.00
	JWS	L240	A103	THE ASSOCIATIONS OPPOSITION TO ASSIST WITH CONTINUATION OF REPLY BRIEF. DRAFT/REVISE (CONTINUE) REPLY BRIEF ARGUMENTS 1-3 RE: ASSOCIATIONS, MISINTERPRETATION OF CASE LAW, COURT'S	0.85	148.75
	JWS	L240	A103	SEPTEMBER 15, 2018 ORDER, AND FAILURE TO INSPECT. DRAFT/REVISE (CONTINUE) REPLY BRIEF ARGUMENT 4 AND	0.90	157.50
				CONCLUSION.	0.60	105.00
09/25/2018		L240 L240		REVIEW/ANALYZE ALL EXHIBITS UTILIZED BY THE HOA IN SUPPORT OF ITS OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE (OVER 200 PAGES) IN ORDER TO FIND PORTIONS OF THOSE EXHIBITS TO USE AGAINST THE HOA IN THE SECTIONS OF THE REPLY BRIEF BEING FINALIZED TODAY (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/EVISE OUTLINE OF ADDITIONAL ARGUMENTS FOR	1.10	192.50
				FINALIZATION OF THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE INCLUDING: 1) REWRITING HISTORY; 2) NEW CLAIMS; 3) EXCESSIVE COST OF INVESTIGATION; 4) NRS 40.645(2)(B) AND (C); AND 5) SEWER ISSUES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.55	96.25
	PCB	L240	A103	DRAFT/RÉVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE: 1) THE HOA'S ATTEMPT TO REWRITE HISTORY ((AS PER CARRIER DIRECTIVE, TIME SPLIT WITH		
	PCB	L240	A103	OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (CONTINUE) OUTLINE OF ADDITIONAL ARGUMENTS FOR FINALIZATION OF THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: NEW CLAIMS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.45	78.75
	РСВ	L240	A103	CASE - TOWER II). DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: EXCESSIVE COST OF INVESTIGATION (AS PER CARRIER DIRECTIVE, TIME SPLIT	0.60	105.00
	РСВ	L240	A103	WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: NRS 40.645(2)(B) AND (C) (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.35	61.25
	РСВ	L240	A103	CASE - TOWER II). DRAFT/REVISE (FINALIZE) REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: SEWER ISSUES (AS PER CARRIER	0.65	113.75
					A A 2 2 7 1	

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					Hours	
				DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; MORE THAN 8 HOURS BILLED IN ONE DAY ON THIS FILE DUE TO ALL WORK PERFORMED IN FINALIZING THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE, INCLUDING REVIEW OF DOCUMENTS, OUTLINING ADDITIONAL ARGUMENTS, AND DRAFTING FIVE SECTIONS OF NEW ARGUMENTS FOR THE REPLY BRIEF).	0.40	70.00
09/30/2018	PCB	L240 <i>i</i>	A101	PLAN AND PREPARE (CONTINUE) FOR HEARING OF MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: CONTINUE TO OUTLINE ORAL ARGUMENTS AND TO REVIEW THE ORIGINAL ORDER FROM THE COURT ON THE INITIAL MOTION FOR SUMMARY JUDGMENT ON THE ORIGINAL NOTCIE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.60	105.00
10/01/2018	JWS	L230 /	A104	REVIEW/ANALYZE (LIMITED SCOPE) CORRESPONENCE/NOTES AND COURT DOCKET RE: UPCOMING HEARING/SCOPE OF	0.40	47.50
	PCB	L240 /	A101	SAME. PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S MOTION FOR SUMMARY JUDGMENT HEARING ON THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER EACH OF THE SECTIONS OF JUDGE JOHNSON'S SEPTEMBER 2017 RULING THAT WILL NEED TO BE RELIED ON DURING ORAL ARGUMENT TOMORROW AND OUTLINING THE POTENTIAL ORAL ARGUMENTS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.10	17.50
	PCB	L240 /	A103	OTHER FILE IN SAME CASE - TOWER II) DRAFT/REVISE EMAIL TO CARRIERS AND TO COVERAGE COUNSEL RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.55	96.25
	PCB	L240 /	A101	OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE (CONTINUE) FOR TOMORROW'S HEARING ON THE MOTION FOR SUMMARY JUDGMENT ON THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER ALL DOCUMENTATION PERTAINING TO THE HISTORY OF THE LITIGATION, INCLUDING EVERY PLEADING FILED BY THE HOA THAT DID NOT REFERENCE NRS 40.645(4)(A), IN ORDER TO SUPPORT THE ORAL ARGUMENTS REGARDING WAIVER AND LACHES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.15	26.25
	PCB	L240 /	A101	OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE (CONTINUE) FOR HEARING ON THE MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: CONTINUE TO WORK ON ORAL ARGUMENT OUTLINE, WITH SPECIFIC REFERENCE TO EXHIBITS AND DOCUMENTATION FROM THE HOA'S OWN EXPERTS, TO ADDRESS THE SEWER CLAIM AND THE RENEWED ARGUMENT AS TO THE "ABUSE OF PROCESS" POSITION RAISED BY THE HOA (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.50	87.50 140.00
10/02/2018	PCB	L240 /	A101	PLAN AND PREPARE (CONTINUE) FOR HEARING TODAY ON		

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					Hours	
				MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: GOING OVER EACH OF TWELVE (12) SECTIONS OF ANTICIPATED ORAL ARGUMENT (LITIGATION HISTORY, LACHES, WAIVER, NRS 40.646(4)(A), APPLICATION OF STATUTE TO THE FACTS OF THIS CASE, SATISFACTION OF THAT STATUTE; COURT "GUIDANCE," SEWER LINE RUPTURE, FIRE-BLOCKING, WINDOW ALLEGATION, DUE PROCESS, "NEW" ISSUES, THE COMPLAINT, AND CONCLUSION), IDENTIFYING ADDITIONAL DOCUMENTS TO USE DURING ORAL ARGUMENT TO SUPPORT EACH SECTION, AND PRACTICING ORAL ARGUMENTS FOR EACH SECTION (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE -		227 50
	PCB	L240	A109	TOWER II). APPEAR FOR/ATTEND HEARING ON MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; NO TRAVEL TIME INCLUDED IN THIS	1.30	227.50
	PCB	L120	A101	ENTRY). PLAN AND PREPARE FOR NEXT STEPS OF THE LITIGATION	2.20	385.00
	PCB	L110	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE (BEGIN) DOCUMENTS FROM THE JOB FILE AND FROM THE HOA (E.G. CC&RS) IN ORDER TO START WORK ON POSSIBLE STANDING MOTION (AS PER CARRIER	0.30	52.50
	PCB	L240	A109	DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND HEARING ON MOTION FOR SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; SEPARATE TRAVEL TIME BILLED AS PER ESIS GUIDELINES AT 1/2 OF ACTUAL TIME80).	0.15	26.25 35.00
10/03/2018	PCB	L120	A104	REVIEW/ANALYZE (CONTINUE) FILE DOCUMENTS FROM THE EARLIER CASE DEALING WITH PANORAMA TOWERS AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.60	105.00
10/04/2018	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH SIMON LOADSMAN (PROPOSED FENESTRATION EXPERT) RE: (AS PER CARRIER		
	PCB	L120	A103	DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). DRAFT/REVISE REPORT TO CARRIERS RE:	0.20	35.00
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	Δ Δ 3 2 7 6	<u> </u>

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				OTHER FILE IN SAME CASE - TOWER II).	Hours 0.70	122.50
10/05/2018	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH KEN REID (PROPOSED FENESTRATION EXPERT) RE:		
					0.05	8.75
10/08/2018	PCB	L190	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COVERAGE COUNSEL FOR SOMPO (JAN DUFFALO) RE:		
	РСВ	L390	A101	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR TODAY'S SPECIAL MASTER HEARING RE: OUTLINE POSITIONS TO TAKE DEPENDING ON WHAT ARGUMENTS MAY BE RAISED BY COUNSEL FOR THE HOA DURING THRE HEARING TO MOVE THE CASE FASTER THAN SHOULD BE ALLOWED GIVEN THE STILL OUTSTANDING ISSUES OVER THE CHAPTER 40 NOTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE -	0.10	17.50
	PCB	L390	A109	TOWER II). APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER	0.15	26.25
	PCB	L390	A109	CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; NO TRAVEL TIME INCLUDED IN THIS ENTRY). APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; SEPARATE TRAVEL TIME BILLED AS PER	0.40	70.00
				ESIS GUIDELINES AT 1/2 OF ACTUAL TIME EXPENDED - 1.2).	0.30	52.50
10/09/2018	PCB	L390	A104	REVIEW/ANALYZE SPECIAL MASTER ORDER ADDRESSING THE ISSUES DISCUSSED YESTERDAY AT THE SPECIAL MASTER HEARING IN ORDER TO MAKE SURE WHAT IS IN THE ORDER IS CORRECT (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	8.75
10/11/2018	PCB	L240	A101	PLAN AND PREPARE (CONTINUE) FOR NEXT MOTION TO BE FILED (STANDING) RE: CONTINUE TO WORK OF FOUNDATION FOR ARGUMENT AS TO STANDING ON THE WINDOW ISSUES AND, POSSIBLY, FOR THE FIRE PROTECTION ISSUE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
				CASE - TOWER II).	0.20	35.00
10/12/2018		L240 L250		PLAN AND PREPARE FOR (CONTINUE) FOR NEXT DISPOSITIVE MOTION (STANDING) RE: CONTINUE TO OUTLINE THE ARGUMENTS TO USE IN THE MOTION AND THE RELIANCE ON THE CC&RS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT FILED	0.20	35.00
	DIG	LZUU	A10 4	BY DEFENDANTS/THIRD-PARTY PLAINTIFFS PANORAMA TOWERS I, LLC AND PANORAMA II, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT, TO EVALUATE ARGUMENTS		
				0101	AA3277	

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			AND BASES THEREIN, IN PREPARATION FOR DRAFTING A	Hours	
DRG	L250	A104	MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.80	140.00
DRG	L250	A104	PANORAMA TOWERS I, LLC AND PANORAMA II, LLC'S MOTION FOR PARTIAL SUMMARY JUDGMENT, RE: UNIT COMPARISONS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) DECLARATION OF COVENANTS,	0.20	35.00
			CONDITIONS AND RESTRICTIONS AND GRANT AND RESERVATION OF EASEMENTS FOR PANORAMA TOWERS, (PAGES 1-66), RE: EVALUATE THE PROVISIONS THERE IN CONTEMPLATION OF PREPARING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.70	122.50
DRG	L250	A104	REVIEW/ANALYZE (CONTINUE) DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND GRANT AND RESERVATION OF EASEMENTS FOR PANORAMA TOWERS, (PAGES 67-142), RE: EVALUATE THE PROVISIONS THERE IN CONTEMPLATION OF PREPARING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH	0.10	122.00
DRG	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TOWER II PLANS AND ASSESSOR MAPS AND PARCEL UNITS, INCLUDING UNIT BOUNDARIES, FROM PRIOR LITIGATION DISCOVERY (P011010-P011102; 96 PAGES) RE: EVALUATED BOUNDARY MAPS IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING	0.85	148.75
DRG	L250	A104	STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING IN PART AND DENYING IN PART PLAINTIFF'S MOTION FOR DECLARATORY RELIEF ON	0.70	122.50
			STANDING FOR PRIOR AND SEPARATE, SANDSTONE HOA V SANDSTONE CASE, EVALUATE COURT'S ARGUMENTS IN ORDER TO EVALUATE THE POTENTIAL FOR SUCCESS AND ARGUMENTS TO CLARIFY, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45	78.75
DRG	L250	A104	REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER REGARDING PLAINTIFF'S MOTION FOR APPROVAL OF NOTICE, WITH STANDING ISSUES EMBEDDED, FOR PRIOR AND SEPARATE, SKY LAS VEGAS ASSOCIATION V. SKY LAS VEGAS CONDOMINIUMS CASE, EVALUATE COURT'S ARGUMENTS IN ORDER TO EVALUATE TO POTENTIAL FOR		
DRG	L250	A104	SUCCESS AND ARGUMENTS TO CLARIFY, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ASSEMBLY BILL 125, RE: ALTERATIONS TO PERTINENT CHAPTER 40 PROVISIONS, INCLUDING THOSE REGARDING REPRESENTATIVE STANDING BY HOMEOWNER'S	0.40	70.00
			ASSOCIATIONS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.55	96.25
			0102	AA3278	

CHUBB INSURANCE

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					Hours	
10/14/2018	PCB	L130	A104	REVIEW/ANALYZE SEVERAL FILE DOCUMENTS THAT PERTAIN TO THE ORIGINAL WINDOW DESIGN, THE POSSIBLE APPLICATION OF THE EFIS SYSTEM REQUIREMENTS TO THE WINDOW ISSUE, THE NEED FOR THE FENESTRATION EXPERTS TO ADDRESS THE QUESTIONS SURROUNDING HOW THE FLASHING FITS INTO THE "UNIT BOUNDARY" DISCUSSION, AND HOW THE WINDOW ISSUES, IF REPAIRED, MAY IMPACT THE ANALYSIS BEING USED TO SUPPORT THE MOTION FOR DECLARATORY RELIEF AS TO STANDING THAT IS BEING PREPARED (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.40	70.00
	PCB	L130	A109	OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND MEETING WITH FENESTRATION EXPERTS TO REVIEW PLANS AND TO DISCUSS HOW THEIR OPINIONS ON THE WINDOW ISSUES ARE NECESSARY TO SUPPORT THE MOTION FOR DECLARATORY RELIEF AS TO STANDING THAT IS BEING PREPARED (NO TRAVEL TIME INCLUDED IN THIS ENTRY SINCE THE MEETING TOOK PLACE AT BWB&O'S OFFICE; NON-BILLABLE TO FILE SINCE OTHER ATTORNEYS FROM BWB&O WORKING ON THE MOTION FOR DECLARATORY RELIEF WERE ALSO PRESENT SO PBC DID NOT BILL FOR HIS TIME; TIME BILLED BY JEFF SAAB AND DEVIN GIFFORD LIKELY GREATER THAN PCB'S NON-BILLED 1.2 SINCE THEY MET WITH THE EXPERTS BOTH BEFORE AND	0.40	70.00
	JWS	L340	A101	AFTER PCB'S ATTENDANCE AT THE MEETING). PLAN AND PREPARE FOR (LIMITED SCOPE) MEET AND CONFER WITH FENESTRATION EXPERTS, REID AND LOADSMAN RE:	1.20	n/c
	JWS	L340	A109	TOWER TWO CASE. APPEAR FOR/ATTEND EXPERT MEETING WITH DEVIN GIFFORD, KEN REID AND SIMON LOADSMAN, TRAVEL TIME IN ENTRY. SPLIT WITH TOWER II	0.25	43.75
	JWS	L340	A108	CASE. COMMUNICATE (OTHER EXTERNAL) CALL WITH MKA'S SHELLY ROBBINS	1.50	262.50
	DRG	L340	A101	PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS,	0.05	8.75
	DRG	L340	A101	(SPLIT WITH TOWER II FILE PER ADJUSTER) PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS,	0.15	26.25
	DRG	L340	A101	(SPLIT WITH TOWER II FILE PER ADJUSTER) PLAN AND PREPARE FOR MEETING WITH FENESTRATION EXPERTS, RE:	0.70	122.50
	DRG	L340	A109	(SPLIT WITH TOWER II FILE PER ADJUSTER) APPEAR FOR/ATTEND MEETING WITH FENESTRATION	0.10	17.50
				0103	AA327	9

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				Hours	
			EXPERTS, RE:		
			(SPLIT WITH TOWER II FILE PER ADJUSTER)	1.50	262.50
DRG	L250	A104	REVIEW/ANALYZE TOWER PACKAGE PLANS, TOWER I PLANS, TOWER II PLANS, KEY PLANS AND GARAGE PLANS, RE: ANALYZED PLANS FOR THE PROJECT TO LOCATE AND IDENTIFY PLANS INDICATING THE BASIS FOR LACK OF PAN AND HEAD FLASHING AT THE PROJECT IN PREPARATION DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING		
DRG	L250	A104	STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE PHOTOS OF INSPECTIONS FROM 2009 (DSCN6777- 6879; 7637-7978; 7983-8136); TO ILLUMINATE THE BASIS FOR LACK OF PAN AND HEAD FLASHING AT WINDOWS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH	0.95	166.25
DRG	L250	A104	TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE PANORAMA HOA'S INITIAL CHAPTER 40 NOTICE, DATED FEBRUARY 24, 2016, INCLUDING EXHIBITS, IN ORDER TO EVALUATE THE BASES OF ALLEGATIONS CONTAINED THEREIN, IN PREPARATION DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT		113.75
DRG	L250	A104	WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE PANORAMA HOA' S AMENDED CHAPTER 40 NOTICE, DATED APRIL 5, 2018, INCLUDING ATTACHED EXHIBITS, EXPERT REPORT, AND EVALUATION OF DEFECTS, AND PHOTOGRAPHS, IN ORDER TO EVALUATE THE BASES OF ALLEGATIONS CONTAINED THEREIN, IN PREPARATION DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING	0.40	70.00
DRG	L250	A104	STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE KRESS V KOREY, NEVADA SUPREME COURT CASE, RE: DECLARATORY RELIEF AND FACTORS FOR ANALYSIS, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH	0.45	78.75
DRG	L250	A104	TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE ONLINE CASE FILINGS, RE: IN ORDER TO EVALUATE PROCEDURAL HISTORY THUS FAR IN THIS LITIGATION, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH	0.35	61.25
DRG	L250	A104	TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE COMPLAINT OF DEFECTS, FILED BY CLIENTS, IN ORDER TO EVALUATE PROCEDURAL STATUS OF MATTER, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH	0.15	26.25
DRG	L250	A104	TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE ANSWER BY PANORAMA ASSOCIATION TO OUR COMPLAINT AND COUNTER-CLAIM, IN PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING	0.15	26.25
DRG	L250	A104	STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER) REVIEW/ANALYZE MOTION FOR SUMMARY JUDGMENT AND COURT ORDER REGARDING SAME, RE: IN ORDER TO EVALUATE PROCEDURAL HISTORY AND BASIS FOR ARGUMENTS SUPPORTING DEFICIENCIES IN THE ASSOCIATION'S CHAPTER 40 NOTICE, IN PREPARATION FOR	0.20	35.00
				A A 2 2 2 0	

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					Hours	
				DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.20	35.00
10/15/2018	JBV	L320	A103	DRAFT/REVISE EMAIL CORRESPONDENCE TO LITIGATION SERVICES, RE: REQUEST FOR ACCESS TO CASE ON YES LAW - ONLINE DOCUMENT DEPOSITORY, IN ORDER TO ACCESS DOCUMENTS DISCLOSED IN PRIOR LITIGATION. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.05	4.75
	JBV	L320	A104	REVIEW/ANALYZE (BEGIN) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED VERSIONS OF ARCHITECTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	42.75
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED VERSIONS OF STRUCTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	42.75
	JBV	L320	A104	REVIEW/ANALYZE (BEGÍN) DOCUMENTS RECEIVED FROM CLIENT DURING PRIOR LITIGATION OF VARIOUS VERSIONS OF ARCHITECTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT		
	JBV	L320	A104	WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED IN PRIOR LITIGATION OF PLAINTIFF-DISCLOSED VERSIONS OF STRUCTURAL PLANS, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER	0.45	42.75
	JBV	L320	A104	II CASE PER ADJUSTER). REVIEW/ANALYZE REVISED OCTOBER 2006 ARCHITECTURAL AND STRUCTURAL PLANS, RE: RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT	0.45	42.75
	JWS	L240	A101	WITH TOWER II CASE PER ADJUSTER). PLAN AND PREPARE FOR AND ASSIST WITH FORMULATION OF ARGUMENTS RE: MOTION FOR SUMMARY JUDGEMENT ON	0.30	28.50
				STANDING RE: WINDOWS AND POTENTIALLY FIRE BLOCKING.	0.15	26.25
				0105	AA3281	

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

10/16/2018

IWS	L150	Δ104	REVIEW/ANALYZE CORRESPONDENCE/NOTES TO ASSIST	Hours	
0110	2100	71101	WITH EVALUATION OF TASKS/DISCOVERY MOVING FORWARD.		
			TIME SPLIT WITH TOWER TWO CASE.	0.20	35.00
DRG	L250	A104	REVIEW/ANALYZE NEVADA PRECEDENT, WARTH V SELDIN		
			SUPREME COURT CASE, RE: IN ORDER TO EVALUATE THE		
			SUPREME COURT'S POSITION ON STANDING TO BRING		
			CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR		
			DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH		
			TOWER II FILE PER ADJUSTER)	0.15	26.25
DRG	L250	A104	REVIEW/ANALYZE NEVADA PRECEDENT, DR HORTON V		
			EIGHTH JUDICIAL DISTRICT COURT CASE, RE: IN ORDER TO		
			EVALUATE THE COURT'S POSITION ON ASSOCIATION		
			REPRESENTATIVE STANDING TO BRING CLAIMS, IN		
			PREPARATION FOR DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II FILE		
			PER ADJUSTER)	0.20	35.00
DRG	L250	Δ104	REVIEW/ANALYZE NEVADA PRECEDENT, BEAZER HOMES	0.20	33.00
DITO	L200	71104	HOLDINGS CORP V EIGHTH JUDICIAL DIST. COURT OF NEV		
			CASE, RE: IN ORDER TO EVALUATE THE COURT'S POSITION		
			ON ASSOCIATION REPRESENTATIVE STANDING TO BRING		
			CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR		
			DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH		
			TOWER II FILE PER ADJUSTER)	0.35	61.25
DRG	L250	A103	DRAFT/REVISE (BEGIN) MOTION FOR DECLARATORY RELIEF		
			REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR		
			SEPARATE INTERESTS, BEGAN PROPOSED LEGAL STANDARD		
			SECTIONS, INCLUDING DECLARATORY RELIEF STANDARDS		
			(SPLIT WITH TOWER II FILE PER ADJUSTER)	0.55	96.25
DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY		
			RELIEF REGARDING ASSOCIATION STANDING TO BRING		
			CLAIMS FOR SEPARATE INTERESTS, CONTINUED PROPOSED		
			LEGAL STANDARD SECTIONS, INCLUDING DECLARATORY		
			RELIEF AND ALTERATIONS TO PERTINENT PROVISIONS WITHIN NRS 40.600 ET SEQ AND NRS 116.3102 (SPLIT WITH		
			TOWER II FILE PER ADJUSTER)	0.70	122.50
DRG	L250	Δ103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY	0.70	122.50
DITO	L200	71100	RELIEF REGARDING ASSOCIATION STANDING TO BRING		
			CLAIMS FOR SEPARATE INTERESTS, COMMENCED		
			INTRODUCTION, INCLUDING PERTINENT BACKGROUND		
			INFORMATION OBTAINED FROM DOCUMENTS AND ONLINE		
			SOURCES REVIEWED, AND CHAPTER 40 NOTICES SERVED		
			(SPLIT WITH TOWER II FILE PER ADJUSTER)	0.90	157.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) ARCHITECTURAL PLANS FROM		
			PRIOR LITIGATION-REVISED DECEMBER 2016, RE:		
			DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION, IN		
			PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING		
			DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	42.75
DRG	L340	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH	0.43	42.13
טוע	LU-7U	71100	EXPERT, SIMON LOADSMAN, RE:		

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				Hours	
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW UP TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.50	87.50
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SIMON LOADSMAN, RE:	0.05	8.75
JBV	L320	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF'S EXPERT, ALLEN GROUP IN PRIOR LITIGATION OF ARCHITECTURAL PLANS AND NOTES, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING	0.05	8.75
JBV	L320	A104	ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF TOWER PLANS FROM MAY 2006, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING	0.55	52.25
JBV	L320	A104	DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) STRUCTURAL PLANS FROM PRIOR LITIGATION-REVISED DECEMBER 2016, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING	0.45	42.75
JBV	L320	A104	DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF "KEY" PLANS FROM MAY 2007, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING	0.45	42.75
JBV	L320	A104	DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (BEGIN) CLARK COUNTY CITY DEPARTMENT OF DEVELOPMENT SERVICES DOCUMENTATION (FOLDERS 01-05), PRODUCED IN PRIOR LITIGATION BY PLAINTIFF, RE: DETERMINING IF ANY REFERENCE EXISTS WITHIN WHICH CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK	0.45 Δ Δ 3 2 8 3	42.75

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					Hours	
	DRG	L250	A104	REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE AAMA GLOSSARY FROM EXPERT, SIMON	0.30	28.50
				LOADSMAN, RE: (SPLIT		
	DRG	L250	A104	WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE IPCB-08 MANUAL, AAMA STANDARD PRACTICE FOR INSTALLATION OF WINDOWS AND DOORS IN COMMERCIAL BUILDINGS, CONFIGURATION OF PAN FLASHING TO WINDOW SYSTEMS, IN ORDER TO INCORPORATE INTO	0.20	35.00
	DRG	L250	A103	MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DISCUSSION OF	0.30	52.50
	DDO	1.050	4400	ASSOCIATION'S CHAPTER 40 NOTICE AND AMENDED CHAPTER 40 NOTICE, AND DECLARATORY RELIEF ARGUMENTS (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.85	148.75
	DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DECLARATORY RELIEF ARGUMENTS AS TO WHY DECLARATORY RELIEF IS		
				APPROPRIATE (SPLIT WITH TOWER II FILE PER ADJUSTER)	0.70	122.50
10/17/2018	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) CLARK COUNTY CITY DEPARTMENT OF DEVELOPMENT SERVICES DOCUMENTATION (FOLDERS 06-09), PRODUCED IN PRIOR LITIGATION BY PLAINTIFF, RE: DETERMINING IF ANY REFERENCE EXISTS WITHIN WHICH CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF		
	JBV	L320	A104	MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DOCUMENTS DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION OF TOWER PLANS INCLUDED WITH VARIOUS EXPERT JOB FILES SUCH AS STRUCTURAL AND ARCHITECTURAL, RE: DETERMINING IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY	0.45	42.75
	DRG	L250	A104	FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' PRESENTATION OF DEFECTS AND PHOTOS FROM PRIOR LITIGATION INVOLVING PANORAMA TOWERS, RE: IN AN EFFORT TO LOCATE DOCUMENTS PERTAINING TO EIFS AND EIFS MANUFACTURER, STO, IN PREPARATION FOR DRAFTING A	0.55	52.25
	DRG	L120	A104	MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' DISCLOSURE DOCUMENTS,	0.20	35.00
				,	AA3284	

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				Hours	
DRG	L250	A104	(P0022385), HUNDREDS OF FILE PHOTOS ON DISC, RE: IN AN EFFORT TO LOCATE DOCUMENTS AND PLANS, PERTAINING TO EIFS AND EIFS MANUFACTURER, STO, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE PLAINTIFFS' DISCLOSURE DOCUMENTS, (P0022386), HUNDREDS OF FILE PHOTOS ON DISC, RE: IN AN	0.15	26.25
DRG	L340	A104	EFFORT TO LOCATE DOCUMENTS AND PLANS, PERTAINING TO EIFS AND EIFS MANUFACTURER, STO, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.15	26.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.05	8.75
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH MKA EXPERT, SHELLEY ROBBINS, RE:	0.15	26.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CONVERSATION WITH FENESTRATION EXPERT, SIMON LOADSMAN, RE:	0.20	35.00
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE 2011-070 BOX OF CASE INFORMATION FROM STORAGE, RE: PRIOR LITIGATION DOCUMENTS, IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT TO NOT INCLUDE HEAD FLASHINGS,	0.25	43.75
DRG	L250	A104	IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE 2011-072 BOX OF CASE INFORMATION FROM STORAGE, RE: PRIOR LITIGATION DOCUMENTS, IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT TO NOT INCLUDE HEAD FLASHINGS,	0.20	35.00
DRG	L250	A104	IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE TOWER PACKAGE PLANS FROM ARCHITECT, (APPROX 198 PLANS), RE: IN ORDER TO IDENTIFY PERTINENT PLANS TO HEAD TO SHOW THE ARCHITECT'S INTENT TO NOT INCLUDE HEAD FLASHINGS, IN PREPARATION FOR DRAFTING A MOTION FOR DECLARATORY RELIEF	0.30	52.50
				A A 2205	

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			DECARDING STANDING (OBJET MITH TOMER II GAGE BER	Hours	
			REGARDING STANDING (SPLIT WITH TOWER II CASE PER	0.40	70.00
DBC	L250	Λ10 <i>1</i>	ADJUSTER). REVIEW/ANALYZE (CONTINUE) THE ASSOCIATION'S AMENDED	0.40	70.00
DKG	L230	A 104	CHAPTER 40 NOTICE, RE: ANALYZED STO MATERIALS AND		
			DETAILS, IN ORDER TO IDENTIFY THE BASIS FOR THE		
			ASSOCIATION'S ARGUMENTS IN SUPPORT OF HEAD		
			FLASHINGS AT THE PROJECT, IN PREPARATION FOR		
			DRAFTING A MOTION FOR DECLARATORY RELIEF REGARDING		
			STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.15	26.25
DRG	L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY		
			RELIEF REGARDING ASSOCIATION STANDING TO BRING		
			CLAIMS FOR SEPARATE INTERESTS, ARGUMENTS		
			REGARDING WHY ASSOCIATION LACKS STANDING TO BRING		
			NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE	0.00	157.50
DDC	1.250	A 102	TO ENACTMENT OF AB 125.	0.90	157.50
DKG	L250	A 103	DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING		
			CLAIMS FOR SEPARATE INTERESTS, ARGUMENTS		
			REGARDING WHY ASSOCIATION LACKS STANDING TO BRING		
			NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE		
			TO ENACTMENT OF AB 125.	0.85	148.75
JBV	L320	A104	REVIEW/ANALYZE (BEGIN) DISCS FROM PRIOR LITIGATION OF		
			DEFENDANT DISCLOSURES (PLANS FROM OCTOBER		
			THROUGH MARCH 2007; VARIOUS DRAWS FOR MJ DEAN		
			ALONG WITH INVOICES AND JOB FILE DOCUMENTS FOR		
			SUBCONTRACTORS), RE: DETERMINING EXACT DISCLOSURES		
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING		
			DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER		
			ADJUSTER).	0.60	57.00
JBV	L320	A104		0.00	01.00
-			LITIGATION OF DEFENDANT DISCLOSURES (NON-PLAN		
			DOCUMENTATION INCLUDING ADDITIONAL DRAWS FOR BOTH		
			TOWERS), RE: DETERMINING EXACT DISCLOSURES WITHIN		
			TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW		
			CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND		
			WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION		
			AS WELL AS EIFS INFORMATION, IN PREPARATION FOR		
			PROVIDING ATTORNEY FOR USE DURING DRAFTING OF	0.55	
			MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.55	52.25
JBV	L320	A 1 O 4	REVIEW/ANALYZE (BEGIN) DISCS FROM PRIOR LITIGATION OF		
JDV	L320	A 104	KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI 0000001-2500),		
			RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF		
			ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES		
			IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW		
			FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL		
			AS EIFS INFORMATION, IN PREPARATION FOR PROVIDING		
			ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT		
			WITH TOWER II CASE PER ADJUSTER).	0.45	42.75
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR		
			LITIGATION OF KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI		

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				Haven	
			0002501-5000), RE: DETERMINING EXACT DISCLOSURES	Hours	
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND NOTATIONS REFLECTING DEFERMENT TO		
			DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
			USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
			CASE PER ADJUSTER).	0.45	42.75
JBV	L320	A104	REVIEW/ANALYZE (CÓNTINUE) DISCS FROM PRIOR		
			LITIGATION OF KLAI JUBA DISCLOSURES (DISC 1 OF 10: KLAI		
			0005001-6369), RE: DETERMINING EXACT DISCLOSURES		
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND NOTATIONS REFLECTING DEFERMENT TO		
			DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
			USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
ID) (1.000	4404	CASE PER ADJUSTER).	0.30	28.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR		
			LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI		
			0006370-6600), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND NOTATIONS REFLECTING DEFERMENT TO		
			DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
			USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
			CASE PER ADJUSTER).	0.45	42.75
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR		
			LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI		
			0006601-6800), RE: DETERMINING EXACT DISCLOSURES		
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND NOTATIONS REFLECTING DEFERMENT TO		
			USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
			CASE PER ADJUSTER).	0.45	42.75
JBV	L320	Δ104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR	0.40	42.73
ODV	LUZU	/\\IO -	LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI		
			0006801-7000), RE: DETERMINING EXACT DISCLOSURES		
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF		
			WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE		
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND NOTATIONS REFLECTING DEFERMENT TO		
			DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
			USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		
			CASE PER ADJUSTER).	0.40	38.00
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR		
			LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI		

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				Hours	
			0007001-7200), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR		
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
PCB	L240	A103	,	0.40	38.00
			RELIEF AS TO STANDING RE: CONTINUE TO DRAFT SECTIONS WHICH DEAL WITH THE COMMON AREAS OF THE PROJECT AS COMPARED TO THE SEPARATE INTEREST AREAS WHICH ARE THE RESPONSIBILITY OF THE UNIT OWNERS (AS PER		
DRG	L340	A104	CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.60	105.00
			(SPLIT WITH TOWER II CASE	0.05	0.75
DRG	L340	A104	PER ADJUSTER). REVIEW/ANALYZE MKA	0.05	8.75
DDO	1.040	A400	(SPLIT WITH TOWER II CASE PER ADJUSTER).	0.35	61.25
DRG	L340	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SHELLY ROBBINS, RE:		
DRG	L340	A104	. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE SUPPLEMENTAL CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.10	17.50
			(SPLIT WITH TOWER II CASE PER ADJUSTER).	0.05	8.75
DRG	L340	A104	REVIEW/ANALYZE PLANS SENT FROM EXPERT, SHELLY ROBBINS, RE: (SPLIT WITH TOWER II CASE		
DRG	L340	A104	PER ADJUSTER). REVIEW/ANALYZE REPORT REGARDING PRIOR LITIGATION AND ALREADY LITIGATED DEFECT ALLEGATIONS,	0.10	17.50
			SIMILARITIES OF SAME, ALONG WITH SPECIFICATIONS FOR USE IN MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.15	26.25
DRG	L250	A104	REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0019508-D0021251, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS	00	_00
			MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING.		
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D00D0067001-D0078221) RE: ANALYZED	0.35	61.25
			DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS		

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				Hours	
DRG	L250	A104	MANUFACTURER DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0021252-0033000, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER	0.40	70.00
DRG	L250	A104	DEFERS TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0033001-D0044000, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL	0.35	61.25
DRG	L250	A104	APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DISCLOSED PLANS REGARDING TOWER I AND TOWER II, FOR ARCHITECTURALS (A0001-A114 FOR TOWER II AND A-0001-A-0208 FOR TOWER I), IN ORDER TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS	0.30	52.50
DRG	L250	A104	TO ARCHITECT FOR FINAL APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE DEFENDANT'S DISCLOSURE FROM PRIOR LITIGATION, D0044001-D0052455, RE: ANALYZED DISCLOSURES TO IDENTIFY INSTANCES WHERE EIFS MANUFACTURER DEFERS TO ARCHITECT FOR FINAL	0.40	70.00
DRG	L250	A103	APPROVAL OF CHANGES, IN ORDER TO CONTINUE DRAFTING MOTION FOR DECLARATORY RELIEF REGARDING STANDING. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.35	61.25
DRG	L250	A103	NON-COMMON ELEMENT CLAIMS AGAINST OUR CLIENT DUE TO ENACTMENT OF AB 125 AND BEGAN ARGUMENTS WHY REPAIRS AND MAINTENANCE OF WINDOWS FALLS UP ON UNIT OWNERS, NOT ASSOCIATION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY REPAIRS AND MAINTENANCE OF WINDOWS FALLS UP	0.45	78.75
JBV	L320	A104	ON UNIT OWNERS, NOT ASSOCIATION AND BEGAN ARGUMENTS FOR WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0007201-7800), RE: DETERMINING EXACT DISCLOSURES	0.65	113.75

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				Hours	
			WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.00	7.00
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0007801-8400), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.60 57	7.00
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0008401-9000), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II		7.00
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0009001-9900), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.45 42	2.75
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 2 OF 10: KLAI 0009901-10568), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II	0.55 52	2.25
JBV	L320	A104	CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI 010569-11200), RE: DETERMINING EXACT DISCLOSURES	0.40 38	8.00

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WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIES AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIES INFORMATION STEMMING FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER), JEV 1320 A104 REVIEWARALYZE EXHIBITS AE FOR MOTION FOR CLIENT'S MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: BATES LABELED IN ACCORDANCE WITH E.D.C.R. 2.27, IN PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION, EXPERT, SIMON LOADSMAN, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID, RE: DRG 1250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT (NEW REID, RESEARCH ON THE POLITION OF ON THE POLITION			Hours	
FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR USE DURING DRAFTING OF MOTION (SPLIT WITH TOWER II CASE PER ADJUSTER). 0.55 52.25		WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR	110410	
CASE PER ADJUSTER) CAJE PE		FROM STO AND NOTATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR		
PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION. O.30 28.50 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE. DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE. DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, KEN REID,, RE. DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, KEN REID,, RE. DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE. DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID,, RE. DRG L250 A108 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING SPLIT WITH TOWER IL CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CHARLED CONCOLUSION ARGUMENTS AND INTRODUCTION, (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINAL SECONDARY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINAL SECONDARY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, WINDOW "ASSEMBLIES." WINDOW "SYSTEMS." THE CCASE, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING	JBV L320 A104	CASE PER ADJUSTER). REVIEW/ANALYZE EXHIBITS A-E FOR MOTION FOR CLIENT'S MOTION FOR DECLARATORY RELIEF REGARDING STANDING,	0.55	52.25
DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: 0.10 16.50 DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, KEN REID., RE: 0.10 16.50 DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: 0.10 16.50 DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: 0.00 16.50 DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING SASOCIATION STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). 0.70 115.50 DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WITH TEMPORAL SAME SAME SAME SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). 0.35 57.75 DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SE	DRG L250 A108	PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION. COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH	0.30	28.50
DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A108 COMMUNICATE (COTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CCARR'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A108		0.05	8.25
DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH	0.10	16.50
DRG L250 A108 COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL WITH EXPERT, KEN REID., RE: DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RESARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DA45 74.25 PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE	0.10	16.50
DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DCASE PER ADJUSTER). DA45 74.25 PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DA45 74.25	DRG L250 A108	COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE	0.10	16.50
RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	PPO 1070 1400		0.05	8.25
DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DC. 4103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A103	RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, DRAFTED AFFIDAVITS FOR KEN REID AND PETER BROWN, IN SUPPORT OF MOTION		
CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS RESPONSIBILITIES. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A103	WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY	0.70	115.50
ADJUSTER). DRG L250 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING ASSOCIATION STANDING TO BRING CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON		CLAIMS FOR SEPARATE INTERESTS, CONTINUED ARGUMENTS WHY HEAD FLASHINGS ARE SUPERFLUOUS AND THUS OUTSIDE THE SCOPE OF THE ASSOCIATIONS		
CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II CASE PER ADJUSTER). 0.45 74.25 PCB L240 A103 DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	DRG L250 A103	ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY	0.35	57.75
RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO WINDOW "FRAMEWORKS," WINDOW "ASSEMBLIES," WINDOW "SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON		CLAIMS FOR SEPARATE INTERESTS, FINALIZED CONCLUSION ARGUMENTS AND INTRODUCTION. (SPLIT WITH TOWER II	0.45	74.25
"SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL THOSE FACTORS TO THE POSITION THE HOA IS TAKING ON	PCB L240 A103	RELIEF RE: ADDITIONAL WORK ON SECTIONS PERTAINING TO		
		"SYSTEMS," THE CC&R'S, AND THE APPLICATION OF ALL	A A 2201	

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				Hours	
			THE AMENDED CHAPTER 40 NOTICE FOR WINDOW ISSUES (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.90	166.50
JBV	L320	A104	REVIEW/ANALYZE EXHIBITS E-H FOR MOTION FOR CLIENT'S MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: BATES LABELED IN ACCORDANCE WITH E.D.C.R. 2.27, IN	0.90	100.30
JBV	L320	A103	PREPARATION FOR DISCLOSING WITHIN CLIENT'S MOTION. DRAFT/REVISE APPENDIX OF EXHIBITS TO CLIENT'S MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE:	0.30	28.50
JBV	L320	A104	LISTING ALL EXHIBITS, SIZE OF SAID EXHIBITS AND LOCATIONS OF EACH, PURSUANT TO E.D.C.R. 2.27. REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR	0.15	14.25
JBV	L320		LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI 011201-11800), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND SPECIFICATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND EVALUATION TO PREPARE FOR ARGUMENTS IN SUPPORT OF POSITION THAT EIFS MANUFACTURER DEFERRED TO THE DESIGNER (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI	0.60	57.00
			O11801-12300), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR INSTALLATION AS WELL AS EIFS INFORMATION STEMMING FROM STO AND SPECIFICATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS AND EVALUATION TO PREPARE FOR ARGUMENTS IN SUPPORT OF POSITION THAT EIFS MANUFACTURER DEFERRED TO THE DESIGNER (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	42.75
DRG	L250	A108	COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL TO KEN REID,		
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AFFIDAVIT FROM EXPERT, KEN REID, IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING	0.05	8.25
DRG	L250	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
DRG	L250	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
			0446	AA3292	

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				Hours	
	DRG L	_250 A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) FOLLOW-UP TELEPHONE CALL TO SIMON LOADSMAN, RE:	0.05	8.25
	DRG L	_250 A104	. (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AAMA STANDARDS GLOSSARY, EVALUATED THE TERM "ASSEMBLED UNIT" IN ORDER EVALUATE THE POTENTIAL THAT THE OPPOSING SIDE WILL USE IT AGAINST US, AND THE HARM THAT MIGHT CAUSE, IN PREPARATION	0.10	16.50
	DRG L	_250 A103	FOR UPDATING AFFIDAVIT FROM SIMON LOADSMAN, WINDOW EXPERT, TO INCORPORATE INTO MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: CONTINUED CRAFTING ARGUMENTS 1 THROUGH 3 IN PREPARATION FOR FILING	0.10	16.50
	DRG L	_250 A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FOLLOW-UP TELEPHONE CALL WITH	0.85	140.25
	DRG L	_250 A103	EXPERT, SIMON LOADSMAN, (SPLIT WITH TOWER II CASE PER ADJUSTER). DRAFT/REVISE (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: INCORPORATION OF	0.05	8.25
			AFFIDAVIT OF SIMON LOADSMAN INTO MOTION. (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
	DRG L	.250 A103	DRAFT/REVISE (CONTINUE) (CONTINUE) MOTION FOR DECLARATORY RELIEF REGARDING STANDING, RE: FINALIZED MOTION, INCLUDING UPDATED ARGUMENT 2 REGARDING MAINTENANCE OBLIGATIONS OF THE HOMEOWNER VERSUS THE ASSOCIATION. (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45	74.25
10/24/2018	PCB L	_120 A103	DRAFT/REVISE UPDATE TO CARRIERS RE:		
			(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.35	64.75
10/26/2018	JBV L	_320 A104	REVIEW/ANALYZE PLAINTIFF'S AMENDED CHAPTER 40 PLEADING FROM APRIL 2018, RE: DETERMINING DESCRIPTION OF EXHIBITS FROM WITHIN SUCH AS EXPERT REPORTS AND ALLEGATIONS, IN PREPARATION FOR DESCRIBING SAID ALLEGATIONS WITHIN CORRESPONDENCE TO		
			0117	AA3293	

CHUBB INSURANCE

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

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				SUBCONTRACTORS INDICATING NEW NRS 40.646 IDENTIFIED	Hours	
				DEFECTS.	0.15	14.25
	JBV	L320	A104	REVIEW/ANALYZE PREVIOUSLY PROVIDED CORRESPONDENCE TO AQUAMATIC, RE: DETERMINING INFORMATION IDENTIFIED WITHIN, IN PREPARATION FOR PROVIDING CORRESPONDENCE IDENTIFYING INFORMATION		
	JBV	L320	A103	FROM WITHIN PLAINTIFF'S AMENDED NRS 40.646 PLEADING. DRAFT/REVISE CORRESPONDENCE TO AQUAMATIC, RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID SUBCONTRACTOR.	0.05 0.15	4.75 14.25
				SUBCONTRACTOR.	0.15	14.20
10/29/2018	JBV	L320	A104	REVIEW/ANALYZE PLEADINGS FILED, REPORTS SUBMITTED AND DISCOVERY DOCUMENTATION BETWEEN SEPTEMBER 2017 THROUGH PRESENT, RE: DETERMINING WHEN STAY OF LITIGATION WAS IMPLEMENTED AND COMPLETED, IN PREPARATION FOR INCLUDING SAID INFORMATION WITHIN CLIENTS' CORRESPONDENCE TO ALL SUBCONTRACTORS INDICATING NEW DEFECTALIER	0.45	40.75
	JBV	L320	A104	NRS 40.646 PLEADING RECEIVED. REVIEW/ANALYZE AQUAMATIC AND BOMBARD MECHANICAL'S SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT ALLEGATIONS WITHIN.	0.45 0.30	42.75 28.50
				INCORPORATING NEW DEFECT ALLEGATIONS WITHIN.	0.30	20.30
10/30/2018	JBV	L320	A104	REVIEW/ANALYZE VICTAULIC COMPANY, TEXAS WALL SYSTEMS AND SIERRA GLASS & WINDOW SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING	0.40	
	JBV	L320	A104	NEW DEFECT ALLEGATIONS WITHIN. REVIEW/ANALYZE OLD CASTLE BUILDING ENVELOPE, OLD CASTLE, LLC AND OLD CASTLE, INC. SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT	0.40	38.00
	JBV	L320	A104	ALLEGATIONS WITHIN. REVIEW/ANALYZE INSULPRO PROJECTS, FORD CONTRACTING AND FLIPPINS TRENCHING SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING	0.30	28.50
	JBV	L320	A104	NEW DEFECT ALLEGATIONS WITHIN. REVIEW/ANALYZE CULLIGAN WATER AND CULLIGAN WATER ASSOCIATED COMPANIES SECRETARY OF STATE	0.40	38.00
					Δ Δ 3 2 9 Δ	

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				Hours	
JBV	L320	A104	CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT ALLEGATIONS WITHIN. REVIEW/ANALYZE CLIENT'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS' ASSOCIATION'S APRIL 5, 2018 AMENDED NOTICE OF CLAIMS, RE: DETERMINING	0.20	19.00
JBV	L320	A103	WHEN SAID MOTION WAS HEARD, IN PREPARATION FOR INCLUDING SAID INFORMATION INTO CORRESPONDENCE TO ALL SUBCONTRACTORS INFORMING EACH OF THE AMENDED NRS 40.646 DEFECT ALLEGATIONS. DRAFT/REVISE (UPDATE) AQUAMATIC CHAPTER 40 CORRESPONDENCE, RE: INCLUDING ADDITIONAL INFORMATION RELATING TO MOTION FILED BY CLIENT WHICH	0.10	9.50
JBV	L320	A108	LEAD TO THE LIFTING OF STAY OF LITIGATION, AS REQUESTED BY ATTORNEY. COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.10	9.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX,	0.15	14.25
JBV	L320	A104	RE: INCORPORATING CURRENT CORPORATE INFORMATION FOR EACH SUBCONTRACTOR/MANUFACTURER TO BE INFORMED OF AMENDED CHAPTER 40 STATUS, IN ORDER TO ENSURE EACH IS SERVED AT CORRECT LOCATION. REVIEW/ANALYZE OCIP SUBCONTRACTOR MATRIX, RE:	0.30	28.50
			DETERMINING SCOPES OF WORK FOR SUBCONTRACTORS, IN PREPARATION FOR DETERMINING WHICH ADDITIONAL SUBCONTRACTORS SHOULD BE PROVIDED WITH CHAPTER 40 INFORMATION PURSUANT TO NRS 40.646.	0.10	9.50
JBV	L320	A104	REVIEW/ANALYZE SCOPE OF WORK MATRICES (DISCLOSED BY PLAINTIFF IN PRIOR LITIGATION), RE: DETERMINING SUBCONTRACTORS WITHIN, IN PREPARATION FOR DETERMINING SAID SUBCONTRACTORS' SCOPES OF WORK TO DETERMINE WHICH ADDITIONAL SUBCONTRACTORS SHOULD BE PROVIDED WITH NEW DEFECT ALLEGATION		
JBV	L320	A103	INFORMATION PURSUANT TO NRS 40.646. DRAFT/REVISE EMAIL CORRESPONDENCE TO CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.15	14.25
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DISCS FROM PRIOR LITIGATION OF KLAI JUBA DISCLOSURES (DISC 3 OF 10: KLAI 012301-013704), RE: DETERMINING EXACT DISCLOSURES WITHIN TO SEE IF ANY DRAWINGS WITHIN CONSIST OF WINDOW CHANGES IDENTIFYING CHANGES MADE TO THE	0.05	4.75

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

				Hours	
			EIFS AND WINDOW FRAMEWORK REQUIREMENTS FOR	Tiours	
			INSTALLATION AS WELL AS EIFS INFORMATION STEMMING		
			FROM STO AND SPECIFICATIONS REFLECTING DEFERMENT TO DESIGNER, IN PREPARATION FOR PROVIDING ATTORNEY		
			FOR ANALYSIS AND EVALUATION AND PREPARATION FOR		
			ARGUMENTS IN SUPPORT OF POSITION THAT EIFS		
			MANUFACTURER DEFERRED TO THE DESIGNER (SPLIT WITH	0.00	
DRG	L230	Δ104	TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE NOTICE FROM THE COURT, RE: UPCOMING	0.60	57.00
DNG	L230	A104	STATUS CHECK, IN PREPARATION FOR SAME (SPLIT WITH		
			TOWER II CASE PER ADJUSTER).	0.05	8.25
DRG	L120	A104	REVIEW/ANALYZE RECENT NEVADA CASE LAW, REYBURN		
			LAWN AND MAINTENANCE SUPREME COURT CASE, RE: ANALYZED CASE IN ORDER TO EVALUATE THE DUTY TO		
			INDEMNIFY AND TO ESTABLISH LEGAL AUTHORITY WITHIN		
			TENDER LETTERS TO SUBCONTRACTORS, IN PREPARATION		
550			FOR SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.60	99.00
DRG	L120	A104	REVIEW/ANALYZE RECENT NEVADA CASE LAW, SILVER V TELERANT LEASING CASE SUPREME COURT CASE, RE:		
			ANALYZED CASE IN ORDER TO EVALUATE THE DUTY TO		
			INDEMNIFY AND TO ESTABLISH LEGAL AUTHORITY WITHIN		
			TENDER LETTERS TO SUBCONTRACTORS, IN PREPARATION	0.05	
DRG	L340	Δ108	FOR SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) CONFERENCE CALL WITH	0.35	57.75
DITO	L040	71100	EXPERT, SHELLY ROBBINS, RE;		
DDC	1.240	A 1 O 1	(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L340	A 104	REVIEW/ANALYZE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, RE: CLAIMS ALLEGED VERSUS SUBCONTRACTORS'		
			SCOPES OF WORK, IN PREPARATION FOR SUBMISSION OF		
			TENDER LETTERS TO THE SUBCONTRACTORS (SPLIT WITH		
DBC	L340	A 1 O 4	TOWER II CASE PER ADJUSTER)	0.15	24.75
DKG	L340	A 104	REVIEW/ANALYZE AQUAMATIC'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER		
			SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE		
			PER ADJUSTER)	0.10	16.50
DRG	L340	A104	REVIEW/ANALYZE BOMBARD MECHANICAL'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A		
			NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH		
			TOWER II CASE PER ADJUSTER)	0.10	16.50
DRG	L340	A104	REVIEW/ANALYZE CULLIGAN WATER'S PRIOR TENDER		
			LETTER, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH		
			TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE FLIPPIN'S TECHNOLOGY'S PRIOR TENDER		
			LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A		
			NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
DRG	L340	A104	REVIEW/ANALYZE FORD CONTRACTING'S PRIOR TENDER	0.10	10.50
			LETTER, RE: IN ORDER TO EVALUATE WHETHER OR NOT A		
			NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH	0.05	0.05
DRG	L340	∆ 1∩⊿	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FORD CONTRACTING'S PRIOR TENDER	0.05	8.25
2110	2040	, (10 -1	LETTER, RE: IN ORDER TO EVALUATE WHETHER OR NOT A		
			NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH		

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					Hours	
	DRG	L340	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE INSULPRO'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE	0.05	8.25
	DRG	L340	A104	PER ADJUSTER) REVIEW/ANALYZE OLD CASTLE'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW	0.10	16.50
	DRG	L340	A104	TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE OLD CASTLE BUILDING ENVELOPE'S PRIOR	0.05	8.25
	550	1.040	4404	TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER	0.05	8.25
	DRG	L340	A104	REVIEW/ANALYZE SIERRA GLASS'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L340	A104	REVIEW/ANALYZE TEXAS WALL SYSTEMS' PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER SHOULD BE SUBMITTED TO THEM (SPLIT WITH	0.05	0.25
	DRG	L340	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE VICTAULIC'S PRIOR TENDER LETTERS, RE: IN ORDER TO EVALUATE WHETHER OR NOT A NEW TENDER	0.05	8.25
	DRG	L340	A104		0.05	8.25
				TOWER I, COMPARED WITH CLAIMS ALLEGED IN THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN ORDER TO DETERMINE WHICH SUBCONTRACTORS TO TENDER (SPLIT	0.45	04.75
	DRG	L340	A104	WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE SUBCONTRACTOR SCOPES OF WORK FOR TOWER II, COMPARED WITH CLAIMS ALLEGED IN THE ASSOCIATION'S AMENDED CHAPTER 40 NOTICE, IN ORDER TO	0.15	24.75
				DETERMINE WHICH SUBCONTRACTORS TO TENDER (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
10/31/2018	JBV	L320	A104	REVIEW/ANALYZE RESPONSE EMAIL CORRESPONDENCE FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:		
	JBV	L320	A104	REVIEW/ANALYZE PRIOR LITIGATION DOCUMENTATION, RE:	0.05	4.75
	•			DETERMINING IF SUBCONTRACTS LIE WITHIN FOR VARIOUS SUBCONTRACTORS, SPECIFICALLY DEAN ROOFING AND HAMMOND CAULKING, IN PREPARATION FOR DETERMINING SPECIFIC SCOPE OF WORK FOR ALL SUBCONTRACTORS AND		
	PCB	L230	A109	WHETHER THE NEW ALLEGED DEFECTS RELATE. APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.55	52.25
	PCB	L230	A109	CASE - TOWER II). APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; ALSO BILLED AT FULL AMOUNT OF TIME, BUT AT 1/2 REGULAR HOURLY RATE AS PER CARRIER	0.40	74.00
				0404	AA3297	

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	DIRECTIVE).	Hours 0.45	41.63
DRG L340 A1	04 REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:	0.05	0.05
DRG L120 A1	DRAFT/REVISE (BEGIN) FULL NRS 40.645 NOTICE AND REQUEST FOR INDEMNITY AND DEFENSE, INCLUDING CASE LAW IN SUPPORT THEREOF, TO BE SENT TO SUBCONTRACTORS (SPLIT WITH TOWER II CASE PER	0.05	8.25
DRG L120 A1	ADJUSTER) DRAFT/REVISE (BEGIN) NRS 40.645 GENERAL NOTICE OF CONSTRUCTIONAL DEFECTS, FOR SUBCONTRACTORS PREVIOUSLY NOTIFIED OF THE LITIGATION (SPLIT WITH	0.95	156.75
DRG L120 A1	TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) NRS 40.645 GENERAL NOTICE OF CONSTRUCTIONAL DEFECTS, FOR SUBCONTRACTORS NOT PREVIOUSLY NOTIFIED OF ONGOING LITIGAITON (SPLIT WITH	0.60	99.00
	TOWER II CASE PER ADJUSTER)	0.40	66.00
11/01/2018 PCB L190 A1	DRAFT/REVISE (CONTINUE) AMENDED CHAPTER 40 NOTICES TO SUBCONTRACTORS THAT PREVIOUSLY RECEIVED NOTICES, SUBCONTRACTORS THAT ARE GOING TO RECEIVE NOTICES FOR THE FIRST TIME, AND PRODUCT MANUFACTURERS WHICH WERE NOT PART OF THE OCIP RE: CLARIFICATION IN EACH LETTER OF THE FACTS SURROUNDING THE BASIS FOR THE NEW AND AMENDED NOTICES, THE RECENT STAY ON THE LITIGATION, AND THE AMENDED NOTICE FROM THE HOA AND WHY IT WAS ISSUED (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN		
JBV L320 A1	SAME CASE - TOWER II). REVIEW/ANALYZE CENTRO, INC., DEAN ROOFING & INSULATION, DEAN ROOFING CO., DEAN INDUSTRIES, EXPANSION SPECIALTIES PROPERTIES, EXPANSION SPECIALTIES, INC., F. RODGERS CORP., F. RODGERS HOME IMPROVEMENT, F. RODGERS INSULATION OF NEVADA AND F. RODGERS INSULATION RESIDENTIAL SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT	0.40	74.00
JBV L320 A1	ALLEGATIONS WITHIN. 104 REVIEW/ANALYZE JETSTREAM CONSTRUCTION, K&G CONSTRUCTION, LONE MOUNTAIN EXCAVATION & UTILITIES, MESA MECHANICAL, INC., XTREME PLASTERING, LLC AND XTREME MANUFACTURING SECRETARY OF STATE CORPORATE INFORMATION AS WELL AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S AMENDED NRS 40.646 PLEADING DOCUMENTATION INCORPORATING NEW DEFECT	0.45	42.75
JBV L320 A1	ALLEGATIONS WITHIN. 104 REVIEW/ANALYZE FIVE STAR PLUMBING, SILVER STAR PLUMBING, INC., SILVER STAR PLUMBING, LLC, HAMMOND CAULKING, INSULATION MAINTENANCE & CONTRACTING, INC.	0.40 A A 3298	38.00

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				Hours	
			AND INSULATION MAINTENANCE & CONTRACTING LLC SECRETARY OF STATE CORPORATE INFORMATION AS WELL	Hours	
			AS WEBSITES FOR SAID SUBCONTRACTORS, RE: DETERMINING APPROPRIATE CONTACT INFORMATION FOR		
			EACH, IN PREPARATION FOR SERVING WITH PLAINTIFF'S		
			AMENDED NRS 40.646 PLEADING DOCUMENTATION		
JBV	L320	۸ ۱ ۱ ۱ ۲	INCORPORATING NEW DEFECT ALLEGATIONS WITHIN. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX,	0.30	28.50
JDV	L320	A 103	RE: INCORPORATING NEW INFORMATION RELATING TO		
			CURRENT CORPORATE INFORMATION FOR EACH		
			SUBCONTRACTOR/MANUFACTURER TO BE INFORMED OF		
			AMENDED CHAPTER 40 STATUS, IN ORDER TO ENSURE EACH IS SERVED AT CORRECT LOCATION.	0.30	28.50
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) PLAINTIFF'S AMENDED	0.00	20.00
			CHAPTER 40 PLEADING FROM APRIL 2018, RE: DETERMINING		
			WHICH ALLEGATIONS WITHIN DESCRIBE EACH		
			SUBCONTRACTOR/MANUFACTURER'S SCOPE OF WORK, IN PREPARATION FOR DESCRIBING SAID ALLEGATIONS WITHIN		
			CORRESPONDENCE TO SAID SUBCONTRACTOR INDICATING		
			NEW NRS 40.646 IDENTIFIED DEFECTS.	0.30	28.50
JBV	L320	A104	REVIEW/ANALYZE PREVIOUSLY PROVIDED		
			CORRESPONDENCE TO BOMBARD MECHANICAL, FLIPPINS TRENCHING, FORD CONTRACTING, INSULPRO PROJECTS,		
			INC. AND SIERRA GLASS & WINDOW, RE: DETERMINING		
			DEFECTS IDENTIFIED WITHIN WHICH CAN RELATE TO SAID		
			SUBCONTRACTORS' SCOPES OF WORK, IN PREPARATION		
			FOR PROVIDING CORRESPONDENCE IDENTIFYING INFORMATION FROM WITHIN PLAINTIFF'S AMENDED NRS		
			40.646 PLEADING.	0.20	19.00
JBV	L320	A103	DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE		
			TO BOMBARD MECHANICAL, FLIPPINS TRENCHING, FORD		
			CONTRACTING, INSULPRO PROJECTS, INC. (TWO CORRESPONDENCE) AND SIERRA GLASS & WINDOW, RE:		
			PROVIDING INFORMATION RELATING TO PLAINTIFF'S		
			AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS		
			PERTAINING TO SCOPE OF WORK FOR SAID		
JBV	L320	۸ ۱ ۱ ۲ ۲	SUBCONTRACTORS. DRAFT/REVISE NEW CHAPTER 40 CORRESPONDENCE TO	0.45	42.75
3D V	L320	A103	DEAN ROOFING CO. (TWO CORRESPONDENCE), F. RODGERS		
			CORP., F. RODGERS INSULATION, INSULPRO, INC., MESA		
			MECHANICAL, SOUTHERN NEVADA PAVING, X-TREME		
			X-CAVATION, RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED		
			DEFECTS PERTAINING TO SCOPE OF WORK FOR SAID		
			SUBCONTRACTORS.	0.60	57.00
JBV	L320	A103	DRAFT/REVISE AMENDED CHAPTER 40 CORRESPONDENCE		
			TO OLD CASTLE BUILDING ENVELOPE, OLD CASTLE, INC. AND TEXAS WALL SYSTEMS, RE: PROVIDING INFORMATION		
			RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY		
			IDENTIFIED DEFECTS PERTAINING TO SCOPE OF WORK FOR		
ID) (1 200	A 4 0 0	SAID MANUFACTURERS.	0.30	28.50
JBV	L320	A103	DRAFT/REVISE (CONTINUE) CHAPTER 40 MATRIX, RE: INCORPORATING CERTIFIED MAIL INFORMATION RELATING		
			TO EACH SUBCONTRACTOR/MANUFACTURER PROVIDED		
			WITH NRS 40.646 INFORMATION IN ORDER TO ENSURE EACH		
				A A 2200	

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				Hours	
			IS SERVED AND SIGNED FOR BY A REPRESENTATIVE OF EACH COMPANY.	0.20	19.00
DRG	L230	A104	REVIEW/ANALYZE NOTICE OF SPECIAL MASTER HEARING,		
			SERVED ON ALL COUNSEL, IN PREPARATION FOR SAME (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.05	8.25
DRG	L120	A104	REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM	0.00	0.20
			PRIOR LITIGATION REGARDING PANORAMA TOWERS, (MJD0000001-5647; APPROX. 5647 PAGES), ANALYZED		
			DOCUMENTS TO IDENTIFY AND EVALUATE CONTRACTUAL		
			DOCUMENTATION, INCLUDING SCOPES OF WORK, FOR		
			SUBCONTRACTORS ON THE PANORAMA PROJECT, IN PREPARATION FOR FORMULATING A LIST OF		
			SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR		
DBC	L120	A 104	SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.70	115.50
DKG	L120	A104	REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM PRIOR LITIGATION REGARDING PANORAMA TOWERS,		
			(MJD005648-9507; APPROX. 3860 PAGES), ANALYZED		
			DOCUMENTS TO IDENTIFY AND EVALUATE CONTRACTUAL DOCUMENTATION, INCLUDING SCOPES OF WORK, FOR		
			SUBCONTRACTORS ON THE PANORAMA PROJECT, IN		
			PREPARATION FOR FORMULATING A LIST OF		
			SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.55	90.75
DRG	L120	A104	REVIEW/ANALYZE CLIENT'S, MJ DEAN, DISCLOSURES FROM	0.00	00.10
			PRIOR LITIGATION REGARDING PANORAMA TOWERS,		
			(MJD00015953-16576; APPROX. 623 PAGES), ANALYZED DOCUMENTS TO IDENTIFY AND EVALUATE CONTRACTUAL		
			DOCUMENTATION, INCLUDING SCOPES OF WORK, FOR		
			SUBCONTRACTORS ON THE PANORAMA PROJECT, IN PREPARATION FOR FORMULATING A LIST OF		
			SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR		
			SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.45	74.25
DRG	L120	A104	REVIEW/ANALYZE SUBCONTRACT AGREEMENTS FOR TOWER I (APPROX. 320 PAGES) EVALUATED SCOPES OF WORK FOR		
			SUBCONTRACTORS IN COMPARISON WITH ALLEGATIONS IN		
			THE ASSOCIATION'S CHAPTER 40 NOTICE, IN PREPARATION		
			FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE		
			PER ADJUSTER).	0.40	66.00
DRG	L120	A104	REVIEW/ANALYZE SUBCONTRACT AGREEMENTS FOR TOWER		
			II (APPROX 368 PAGES), EVALUATED SCOPES OF WORK FOR SUBCONTRACTORS IN COMPARISON WITH ALLEGATIONS IN		
			THE ASSOCIATION'S CHAPTER 40 NOTICE, IN PREPARATION		
			FOR FORMULATING A LIST OF SUBCONTRACTORS TO TENDER		
			TO WITH THE BASIS FOR SAME. (SPLIT WITH TOWER II CASE PER ADJUSTER).	0.35	57.75
DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, RE:		
			REQUEST FOR CLARIFICATION OF TWO SUBCONTRACTORS' SCOPES OF WORK FOR THE PROJECT, IN ORDER TO		
			DETERMINE WHETHER TO TENDER TO THOSE SUB (SPLIT		
	1010		WITH TOWER II CASE PER ADJUSTER).	0.10	16.50
DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE:		
			OHLLET NODDING, NE.		

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	DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY	0.05	8.25
	DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT,	0.05	8.25
	DRG	L340	A103	SHELLY ROBBINS, RE: DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY	0.05	8.25
				ROBBINS, RE:	0.05	8.25
11/02/2018	JBV	L320	A104	REVIEW/ANALYZE CHAPTER 40 MATRIX, RE OBTAINING CORPORATE INFORMATION FOR FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE LOCATIONS), IN PREPARATION FOR PROVIDING CHAPTER 40 PLEADING INDICATING NEW DEFECT ALLEGATIONS FROM ASSOCIATION, PLUBELLANT TO NIBS 40.646	0.10	0.50
	JBV	L320	A103	PURSUANT TO NRS 40.646. DRAFT/REVISE NEW CHAPTER 40 CORRESPONDENCE TO FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE CORRESPONDENCE), RE: PROVIDING INFORMATION RELATING TO PLAINTIFF'S AMENDED NRS 40.646 NEWLY IDENTIFIED DEFECTS PERTAINING TO SCOPE		9.50
	JBV	L320	A103	OF WORK FOR SAID SUBCONTRACTORS. DRAFT/REVISE (CONTINUE) CHAPTER 40 MATRIX, RE: INCORPORATING CERTIFIED MAIL INFORMATION RELATING TO FIVE STAR PLUMBING & HEATING D/B/A SILVER STAR PLUMBING (THREE CORRESPONDENCE) PROVIDED WITH NRS 40.646 INFORMATION IN ORDER TO ENSURE EACH IS SERVED AND SIGNED FOR BY A REPRESENTATIVE OF EACH	0.20	19.00
	DRG	L340	A108	COMPANY. COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.10	9.50
				(SPLIT WITH TOWER II CASE PER ADJUSTER).	0.10	16.50
11/07/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR BOMBARD MECHANICAL AND FLIPPIN'S TRENCHING, RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND PERSON ACCEPTEE INTO CLIENT'S		
	JBV	L320	A103	CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF BOMBARD	0.05	4.75
11/08/2018	JBV	L320	A104	MECHANICAL AND FLIPPIN'S TRENCHING. REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR FIVE STAR PLUMBING D/B/A SILVER STAR PLUMBING (TWO LOCATIONS) AND MESA MECHANICAL, RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND PERSON ACCEPTEE INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX,	AA3301	0
				0.4.0.	AA33UI	

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					Hours	
				RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF FIVE STAR PLUMBING D/B/A SILVER STAR PLUMBING (TWO LOCATIONS) AND MESA MECHANICAL.	0.05	4.75
11/12/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARD FOR INSULPRO, INC., RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF INSULPRO,	0.05	
	PCB	L230	A101	INC. PLAN AND PREPARE FOR TOMORROW'S STATUS HEARING (SWEEPS HEARING) RE: OUTLINE ISSUES TO ADDRESS WITH THE COURT GIVEN THE RECENT SETTING OF DATE FOR DISCOVERY AND THE LIKELY REQUEST OF THE HOA FOR A TRIAL DATE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05 0.10	4.75 18.50
11/13/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR DEAN ROOFING CO. (CAMERON LOCATION), INSULPRO PROJECTS (CORINTHIAN LOCATION), SOUTHERN NEVADA PAVING AND SIERRA GLASS & MIRROR, RE: VERIFYING WHY CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE, IN PREPARATION FOR INCORPORATING DATE SERVICE WAS ATTEMPTED AND REASONING WHY IT WAS UNSUCCESSFUL INTO CLIENT'S		
	JBV	L320	A103	CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE ATTEMPT AT SERVICES WAS MADE AND REASON CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE ON BEHALF OF DEAN ROOFING CO. (CAMERON LOCATION), INSULPRO PROJECTS (CORINTHIAN LOCATION), SOUTHERN NEVADA PAVING AND SIERRA GLASS	0.10	9.50
	PCB	L230	A109	& MIRROR. APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (NO TRAVEL TIME INCLUDED IN THIS ENTRY; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.10	9.50
	PCB	L230	A109	SAME CASE - TOWER II). APPEAR FOR/ATTEND COURT-ORDERED STATUS CONFERENCE (SEPARATE TRAVEL TIME; AS PER CARRIER BILLING GUIDELINE, TIME BILLED AT 1/2 OF REGULAR RATE; AS PER CARRIER DIRECTIVE, TIME SPLIT WITH WITH OTHER	1.20	222.00
	PCB	L190	A108	FILE IN SAME CASE - TOWER II). COMMUNICATE (OTHER EXTERNAL) WITH CARRIER FOR FLIPPIN'S TRENCHING, ONE OF THE SUBCONTRACTORS THAT IS POTENTIALLY IMPLICATED BY THE SEWER ALLEGATION RE: DISCUSSION OF THE OVERALL STATUS OF THE CASE AND THE RECENT MOTION PRACTICE (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE -	0.25	23.13
11/14/2018	DRG	L120	A104	TOWER II). REVIEW/ANALYZE CORRESONDENCE FROM SILVER STAR PLUMBING, BLOCKED EMAIL CONTENT, PERTAINING TO CASE,	0.05	9.25

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				0127	AA3303	
				RESPONSE.	0.05	4.75
				FLIPPIN'S TRENCHING, RE: RESPONSE TO NRS 40.645 CONSTRUCTION DEFECT INFORMATION PROVIDED PREVIOUSLY BY CLIENT, IN PREPARATION FOR ENSURING RESPONSE TO FLIPPIN'S IS GIVEN TO QUESTIONS RAISED IN		, - -
	JBV	L320	A104	DISCOVERY DEADLINES AND REQUIREMENTS WITHIN, IN PREPARATION FOR ENSURING ALL ARE COMPLIED WITH ON BEHALF OF CLIENT. REVIEW/ANALYZE RESPONSE CORRESPONDENCE FROM	0.05	4.75
	JBV	L320	A104	RODGERS ENTITY LOCATIONS. REVIEW/ANALYZE AMENDED CASE AGENDA DATED NOVEMBER 6, 2018, RE: DETERMINING ADDITIONAL	0.05	4.75
	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF TWO F.	0.00	4.70
	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR F. RODGERS (VALLEY VIEW LOCATION), RE: DETERMINING WHY CHAPTER 40 CORRESPONDENCE WAS UNDELIVERABLE, IN PREPARATION FOR INCORPORATING DATE SERVICE WAS ATTEMPTED INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
11/28/2018	JBV	L320		REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARD FOR F. RODGERS CORP. (NATIONAL DRIVE LOCATION), RE: VERIFYING CHAPTER 40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER 40 MATRIX.	0.05	4.75
11/27/2018	JBV	L320	A104	REVIEW/ANALYZE AND SUMMARIZE ORDER SETTING TRIAL AND PRE-TRIAL DEADLINES DATED NOVEMBER 20, 2018, RE: DETERMINING NEWLY INCLUDED DISCOVERY DEADLINES AND REQUIREMENTS, IN PREPARATION FOR ENSURING ALL ARE COMPLIED WITH ON BEHALF OF CLIENT.	0.10	9.50
				RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING CHAPTER 40 CORRESPONDENCE ON BEHALF OF FORD CONTRACTING, OLD CASTLE AND TEXAS WALL SYSTEMS.	0.05	4.75
	JBV	L320	A103	DETERMINING REASON FOR NON-SERVICE OF CHAPTER 40 DOCUMENTATION, IN PREPARATION FOR INCORPORATING DATE AND REASON FOR NON-SERVICE INTO CLIENT'S CHAPTER 40 MATRIX. DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX,	0.10	9.50
	JBV	L320	A104	40 CORRESPONDENCE WAS DELIVERED SUCCESSFULLY, IN PREPARATION FOR INCORPORATING DATE SERVED AND ACCEPTING PERSONNEL INTO CLIENT'S CHAPTER 40 MATRIX. REVIEW/ANALYZE RETURNED ENVELOPES FROM FORD CONTRACTING AND TEXAS WALL SYSTEMS, RE:	0.05	4.75
11/20/2018	JBV	L320	A104	REVIEW/ANALYZE RETURNED CERTIFIED MAIL CARDS FOR OLD CASTLE (DALLAS LOCATION), RE: VERIFYING CHAPTER	0.00	0.20
	DRG	L120	A103	DRAFT/REVISE CORRESPONDENCE TO SILVER STAR PLUMBING, FOLLOW UP TO RECENT EMAIL AND REQUEST FOR CLARIFICATION (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
				IN ORDER TO FOLLOW UP WITH SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	Hours 0.05	8.25
					Harrina	

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CHUBB INSURANCE

						Hours	
11/30/2018	JBV DRG	L320		REVIEW/ANALYZE FINDINGS OF FACT, CONCLUSIONS OF LA AND ORDER DATED NOVEMBER 29, 2018, RE: THE DECISION MADE ON CLIENT'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANTS' APRIL 5, 2018 AMENDED CLAIMS, IN PREPARATION FOR DETERMINING WHAT PORTIONS WERE GRANTED AND WHICH WERE DENIED. REVIEW/ANALYZE FINDINGS OF FACT AND CONCLUSIONS OLAW REGARDING OUR CLIENT'S MOTION FOR SUMMARY JUDGMENT, RE: ANALYSIS OF COURT'S RULING IN PREPARATION FOR DRAFTING REPLY TO PENDING MOTION FOR DECLARATORY RELIEF (SPLIT WITH TOWER II CASE PEADJUSTER)	F	0.05	4.75 33.00
				For Current Services Rendered Total Non-billable Hours		89.30 1.20	13,529.26
				Recapitulation			
Timekee Peter C. Jeffrey \ Jennifer Devin R Crystal \	Brown W. Saak Vela . Gifford	I		Title Hours PARTNER 18.90 PARTNER 10.35 PARALEGAL 24.45 ASSOCIATE 35.55 PARALEGAL 0.05	Rate \$173.74 175.00 95.00 171.78 95.00	\$3,28 1,81 2,32 6,10	Total 3.76 1.25 2.75 6.75 4.75
				<u>Expenses</u>			
08/06/2018		L100	E112	ODYSSEY (PLAINTIFF'S/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWER'S I, LLC, PANORAMA TOWER'S MEZZ, LLC, AND M.J. DEAN CONSTRUCTION, INC.'S MOTION I SUMMARY JUDGMENT ON DEFENDANT/COUNTERCLAIM PANORAMA TOWER CONDOMINIUM UNIT OWNERS ASSOCIA	FOR		404.75
08/07/2018		L100	E109	APRIL 5,2018 AMENDED NOTICE OF CLAIMS) LOCAL TRAVEL (134) PETER C. BROWN (PARKING) (SPLIT WI 1287.558)	TH		104.75 4.50
09/01/2018		L100	E112	COURT SERVICE (9999) AMERICAN LEGAL SERVICES NEVAD (INVOICE #37017139 COURTESY COPY OF MOTION FOR SUM JUDGMENT - EIGHTH JUDICIAL DISTRICT COURT / SERVICES PROVIDED ON 08/30/2018)	MARY		2.88
09/04/2018		L100	E112	ODYSSEY (STIPULATION AND ORDER TO CONTINUE HEARIN PLAINTIFFS/COUNTER-DEFENDANTS LAURENT HALLIER, PANORAMA TOWERS I, LLC, PANORMA TOWERS I MEZZ, LLC M.J DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMAR JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAM TOWER CONDOMINIUM UNIT OWNER'S ASSOCIATION'S APRI	AND		
09/05/2018		L100	E112	2018 AMENDED NOTICE OF CLAIMS) ODYSSEY (NOTICE OF ENTRY OF STIPULATION AND ORDER CONTINUE HEARING ON PLAINTIFFS/COUNTER-DEFENDANT LAURENT HALLIER, PANORAMA TOWERS, I, LLC, PANORMA TOWERS I MEZZ, LLC AND M.J. DEAN CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT ON DEFENDANT/COUNTER-CLAIMANT PANORAMA TOWER CONDOMINIUM UNIT OWNERS ASSOCIATION'S APRIL 5,2018 AMENDED NOTICE OF CLAIMS)	S		1.75

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L100

09/25/2	2018	L100	E112	PANORAMA TOV M.J. DEAN CONS FOR SUMMARY O PANORAMA TOV	VERS I, LLC, I STRUCTION, I JUDGMENT C VER CONDON	PANORAMA TO NC.'S REPLY IN ON DEFENDANT MINIUM UNIT O	ANTS LAURENT HA DWERS I MEZZ, LLC N SUPPORT OF MO I/COUNTER-CLAIM WNERS' ASSOCIAT	C, AND TION ANT	
09/30/2	2018	L100	E112	(INVOICE NO. 37 SUMMARY JUDG	VICES (9999) 017594/DELI\	AMERICAN LE	S) GAL SERVICES NE Y COPY OF MOTIO /ESRVICES PROVII	N FOR	1.75
10/02/2	2018	L100	E109	ON 09/26/18) PARKING (134) F 1287.558)	PETER C. BRO	OWN (SPLIT BE	ETWEEN 1287.551 A	AND	2.88 6.00
10/02/2	2018	L100	F109	LOCAL TRAVEL	(134) PETER	C BROWN (PA	RKING)		6.00
10/02/2		L100		ODYSSEY (CERT					1.75
10/22/2		L100		ODYSSEY (APPE MOTION FOR DE	ENDIX TO PLA CLARATORY	INTIFFS/COUN	ITER-DEFENDANTS RDING	6'	
10/22/2	2018	L100	E112	STANDING-VOLU		ITER-DEFENDA	ANTS' MOTION FOR	•	1.75
10/22/2	2010	L100	LIIZ	DECLARATORY				`	1.75
11/13/2	2018	L100	E109	LOCAL TRAVEL	(134) PETER	C. BROWN (PA	RKING)		4.00
				Total Expenses					141.51
				Total Current Wor	rk				13,670.77
				Previous Balance					\$5,312.92
					Payme	<u>ents</u>			
10/31/2	2018			PAYMENT RECE	IVED - THANK	K YOU (ESIS C	K #FA78642192 / ST	·MT	
				#12)					-3,966.88
				Balance Due					\$15,016.81
					Past Due A	Amounts			
			<u>0-30</u>	<u>31-60</u>	61-90	91-120		<u>181+</u>	
		13,67	70.77	0.00	0.00	1,346.04	1 0.00	0.00	
					Split Billing	Summary			
						Fees	Expenses	Advances	<u>Total</u>
	BINSURANCE					13,529.26	141.51	0.00	13,670.77
ESIS L	allas AGL Cla	ıms (2) -	Panorar	ma Tower II		13,529.24	141.49	0.00	13,670.73
						27,058.50	283.00	0.00	27,341.50
					Task Code	Summary			
								<u>Fees</u>	<u>Expenses</u>
L100				LOPMENT AND A	OMINISTRATI	ON		0.00	141.51
L110 L120	FACT INVES			ELOPMENI				26.25 1703.25	0.00
L120 L130	ANALYSIS/S EXPERTS/C							1793.25 113.75	0.00 0.00
L150	BUDGETING		,					35.00	0.00
L190			SSMEN	T, DEVELOPMENT	& ADMINIST	RATION		100.75	0.00

141.51

2,069.00

CASE ASSESSMENT, DEVELOPMENT AND ADMINISTRATION

CHUBB INSURANCE

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		<u>Fees</u>	Expenses
L230 L240	COURT MANDATED CONFERENCES DISPOSITIVE MOTIONS	413.26 3115.25	0.00
L250	OTHER WRITTEN MOTIONS AND SUBMISSIONS	4039.00	0.00
L200	PRE-TRIAL PLEADINGS AND MOTIONS	7,567.51	0.00
L320	DOCUMENT PRODUCTION	2327.50	0.00
L340 L390	EXPERT DISCOVERY OTHER DISCOVERY	1407.75 157.50	0.00 0.00
L300	DISCOVERY	3,892.75	0.00

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

TAX ID # 33-0747275

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

Attn: Sherilyn Brydon

Panorama Tower II 5143220827859X-A PANORAMA TOWER II

<u>Fees</u>

					Hours	
01/01/2019	PCB	L190	A104	REVIEW/ANALYZE EMAIL FROM RAMIE MORALES (COVERAGE COUNSEL FOR CHUBB) AND PREPARE EMAIL IN RESPONSE TO SAME RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	9.25
	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH CLIENTS' COST ESTIMATING EXPERT (MKA) RE: (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE -	0.00	0.20
				TOWER II).	0.05	9.25
01/02/2019	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S COST ESTIMATING EXPERT (MKA) RE:		
	PCB	L190	A104	CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE INQUIRY FROM JEFF GANZER (CHUBB),	0.05	9.25
	JBV	L320	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM CLIENT'S	0.20	37.00
	021	2020	7.101	EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:		
				. (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II).	0.05	4.75
	JBV	L320	A104	REVIEW/ANALYZE HEARING TRANSCRIPT DATED SEPTEMBER 27, 2017, RE: DETERMINING IF ANY REFERENCE OF REPAIR PAYMENTS IS MADE WITHIN REGARDING UNIT 300,		
					A A 2207	

0131

AA3307

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					Hours	
	JBV	L320	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE (BEGIN) HEARING TRANSCRIPT FROM HEARING DATED OCTOBER 2, 2018, RE: DETERMINING IF ANY REFERENCE OF REPAIR PAYMENTS IS MADE WITHIN REGARDING UNIT 300,	0.10	9.50
	JBV	L320	A104	REVIEW/ANALYZE OPPOSITIONS FILED BY OPPOSING COUNSEL, RE: VIEWING EXHIBITS AND REFERENCES MADE WITHIN TO DETERMINE IF PAYMENT OF REPAIR MATERIAL IS LOCATED WITHIN,	0.30	28.50
	DRG	L120	A101	CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). PLAN AND PREPARE FOR UPCOMING MOTION PRACTICE, RE: ANALYZED STIPULATION AND ORDER CONTINUING HEARING DATE FOR MOTION FOR DECLARATORY RELIEF AND COURT DOCKET FOR HEARING DATES ON OUR MOTION FOR CLARIFICATION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.30	28.50
01/03/2019	JBV	L320	A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) EXHIBITS TO OPPOSITIONS FILED BY OPPOSING COUNSEL BETWEEN 2016 & 2017, RE: DETERMINING REFERENCES TO REPAIRS OF UNIT 300 MADE WITHIN TO SEE IF PAYMENT AMOUNT OR DESCRIPTION OF REPAIRS IS MENTIONED WITHIN,	0.15	24.75
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) EXHIBITS TO OPPOSITIONS FILED BY OPPOSING COUNSEL BETWEEN 2018, RE: DETERMINING REFERENCES TO REPAIRS OF UNIT 300 MADE WITHIN TO SEE IF PAYMENT AMOUNT OR DESCRIPTION OF REPAIRS IS MENTIONED WITHIN, (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.45	42.75
01/04/2019	PCB	L250	A107	COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE MOTION FOR RECONSIDERATION OF THE COURT'S RULING ON THE MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE AMENDED CHAPTER 40 NOTICE RE: DISCUSSION OF THE ISSUES RAISED IN THE MOTION FOR RECONSIDERATION AND WHETHER THOSE ISSUES CAN ALSO BE ADDRESSED AT THE HEARING ON THE SEPARATE MOTION FOR DECLARATORY RELIEF (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN	0.30 A A 2.209	28.50

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					Hours	
				BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		0.25
	JBV	L320	A104	ADJUSTER) REVIEW/ANALYZE RETURNED CERTIFIED MAIL FOR FIVE STAR	0.05	9.25
				PLUMBING & HEATING (AKA SILVER STAR PLUMBING), RE: DETERMINING WHY CHAPTER 40 CORRESPONDENCE WAS		
				UNDELIVERABLE, IN PREPARATION FOR INCORPORATING		
				DATE SERVICE WAS ATTEMPTED INTO CLIENT'S CHAPTER 40 MATRIX. (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH		
	15) (4.400	OTHER FILE IN SAME CASE - TOWER II).	0.05	4.75
	JBV	L320	A103	DRAFT/REVISE (CONTINUE) CLIENT'S CHAPTER 40 MATRIX, RE: INCORPORATING DATE SERVED AND PERSON ACCEPTING		
				CHAPTER 40 CORRESPONDENCE ON BEHALF OF FIVE STAR PLUMBING & HEATING (AKA SILVER STAR PLUMBING).	0.05	4.75
	JWS	L340	A108	COMMUNICATE (OTHER EXTERNAL) ATTEND/PARTIAL	0.05	4.75
				CONFERENCE CALL WITH STRUCTURAL ENGINEERS, DISCUSSION RE: CASE.	0.15	27.75
					0.13	21.10
01/06/2019	CSW	L120	A104	REVIEW/ANALYZE (BEGIN) DEFENDANT'S LAND WEST BUILDERS MOTION FOR SUMMARY JUDGMENT PURSUANT TO		
				NRS 11.202(1) FROM BYRNE V SUNRIDGE HEIGHTS CASE IN		
				ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT (ALL PRECEDING MOTION WORK AND		
				FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
				ADJUSTER)	0.15	24.75
01/07/2019	JBV	L320	A108	COMMUNICATE (OTHER EXTERNAL) WITH CLIENT'S EXPERTS,		
				SHELLY ROBBINS AND JESSICA DE NORIO OF MADSEN,		
				KNEPPERS & ASSOCIATES (VIA TELEPHONE AND EMAIL CORRESPONDENCE), RE:		
				(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH		
	DRG	L120	A104	OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM COUNSEL FOR	0.10	9.50
	Dito	L120	71101	THE ASSOCIATION, WILLIAMS AND GUMBINER, RE:		
				CONFIRMATION OF RECEIPT OF CHAPTER 40 RESPONSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	CSW	L250	A104	REVIEW/ANALYZE (CONTINUE) DEFENDANT'S LAND WEST		
				NRS 11.202(1) FRO1287M BYRNE V SUNRIDGE HEIGHTS CASE		
				IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL		
				PRECEDING MOTION WORK AND FUTURE MOTION WORK		
				APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.60	99.00
	CSW	L250	A104	REVIEW/ANALYZE WOOD V. SAFEWAY CASE, IN	0.00	00.00
				PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION		
				WORK AND FUTURE MOTION WORK APPROVED BY		
				ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
	CSW	L250	A104	REVIEW/ANALYZE DYKEMA V. DEL WEBB CMTYS INC. CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT		
				REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION		
					Λ Λ 2 2 0 0	

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			Hours	
CSW L250 A	\104	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NEVADA ASSEMBLY BILL 125, IN	0.30	49.50
0000 1050 4	N404	PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW L250 A	A104	REVIEW/ANALYZE OTAK NEVADA LLC V. EIGHTH JUDICIAL DISTRICT COURT OF NEVADA CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CSW L250 A	\104	ADJUSTER) REVIEW/ANALYZE NRS 11.202 AND NRS 40.645, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.15	24.75
CSW L250 A	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE COURT ORDER GRANTING DEFENDANT LAND WEST BUILDER'S MOTION FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V SUNRIDGE HEIGHTS CASE IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.10	16.50
CSW L250 A	\104	ADJUSTER) REVIEW/ANALYZE LANTZY V. CENTEX HOMES CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.35	57.75
CSW L250 A	\104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ARGULLO V. SUNSET STATION, INC. CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.15	24.75
CSW L250 A	\104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE WASHOE MEDICAL CENTER V. SECOND JUDICIAL DISTRICT COURT CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.10	16.50
CSW L250 A	A 104	ADJUSTER) REVIEW/ANALYZE VOLPERT V. PAPAGNA CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II	0.15	24.75
CSW L250 A	\104	CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) DEFENDANT'S LAND WEST	0.10	16.50
		0124	AA3310	

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		Hours	
 	BUILDERS REPLY MOTION FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V SUNRIDGE HEIGHTS CASE IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
\ \ !	REVIEW/ANALYZE STIPULATION AND ORDER EXECUTED BY JUDGE, RE: EXTENSION OF DEADLINES TO FILE BRIEFS IN SUPPPORT OF MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR FILING. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE		
CSW L250 A104 I I I	PER ADJUSTER) REVIEW/ANALYZE (BEGIN) CERTIFICATES OF OCCUPANCY FOR SUBJECT PROPERTIES, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.10	16.50
CSW L250 A104 I	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) DEFENDANT'S LAND WEST BUILDERS REPLY MOTION AND CORRESPONDING EXHIBITS FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V SUNRIDGE HEIGHTS CASE IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.20	33.00
CSW L250 A104 I	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PRO-MAX CORP V. FEENSTRA CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.30	49.50
CSW L250 A104 I	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ALSENZ V. TWIN LAKES VILL. INC. CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.15	24.75
CSW L250 A104 I	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE G & H ASSOCIATES V. ERNEST W. HAHN INC CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.10	16.50
CSW L250 A104 I I I	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE BROWN V. ANGELONE CASE, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.10	16.50
	TOWER II CASE PER ADJUSTER)	0.15	24.75
	0135	AA3311	

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					Hours	
01/09/2019	PCB	L130	A108	COMMUNICATE (OTHER EXTERNAL) WITH MKA (CLIENT'S ARCHITECTURAL AND COST ESTIMATING EXPERTS) RE:		
	РСВ	L130	A108	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). COMMUNICATE (OTHER EXTERNAL) WITH STRUCTURAL AND WINDOW FENESTRATION EXPERTS RE: CONTINUED	0.10	18.50
	РСВ	L120	A101	(AS PER CARRIER GUIDELINES, TIME SPLIT WITH THE OTHER FILE IN THE CASE - TOWER II). PLAN AND PREPARE FOR MEETING WITH THE CLIENTS' EXPERTS RE:	0.15	27.75
	PCB	L130	A109	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). APPEAR FOR/ATTEND TELEPHONE CONFERENCE CALL WITH COST ESTIMATING/ARCHITECTURAL EXPERT AND WINDOW FENESTRATION EXPERT RE:	0.20	37.00
	DRG	L340	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM SHELLY ROBBINS, EXPERT, RE:	0.30	55.50
	DRG	L340	A101	(SPLIT WITH TOWER II CASE PER ADJUSTER). PLAN AND PREPARE FOR UPCOMING CONFERENCE CALL WITH EXPERTS, RE:	0.05	8.25
	DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) CONFERENCE CALL WITH EXPERTS, RE: (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.20	33.00
	DRG	L250	A101	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) PLAN AND PREPARE STRATEGY FOR ATTACKING OPPOSITIONS TO COUNTERMOTIONS BY THE ASSOCIATION REGARDING PAROL EVIDENCE AND RULE 56(F), AS CONTAINED IN OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF REGARDING STANDING, ANALYSIS OF ARGUMENTS PRESENTED IN CONTRAST TO THE	0.40	66.00
					Δ Δ 3312	

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				Hours	
			HYPOCRITICAL NATURE OF THE ARGUMENTS MADE IN THE ASSOCIATION'S OPPOSITION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE	0.45	0.4.75
JWS	L120	A101	PER ADJUSTER) PLAN AND PREPARE FOR MEET AND CONFER WITH EXPERTS/FURTHER MOTION PRACTICE RE:	0.15	24.75
			(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	64.75
CSW	L250	A104	REVIEW/ANALYZE (BEGIN) THE ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF REGARDING COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROLE EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE ACE AMERICAN INSURANCE COMPANY'S COMPLAINT FOR DECLARATORY JUDGMENT, IN PREPARATION FOR DEFENDANT'S OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.40	66.00
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE PLAINTIFF/COUNTERDEFENDANTS' COMPLAINT AGAINST PANORAMA TOWER CONDO UNIT OWNERS' ASSOCIATION, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.10	16.50
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PLAINTIFFS/COUNTER-DEFENDANTS' MOTION FOR DECLARATORY RELIEF REGARDING STANDING, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.10	16.50
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE M.C. MULTI-FAMILY DEVELOPMENT LLC V. CRESTDALE ASSOCIATES LTD CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.40	66.00
CSW	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE STATE EX REL LIST V. COURTESY MOTORS CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.20	33.00
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			AD HIGHER GUERNAU DRIVINGUE ON A 64 46) (ORLITANITU	Hours	
	CSW L250	Δ10/	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CAGE V. PHILLIPS CASE, IN PREPARATION	0.10	16.50
	CSW L250		FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE SOUTHERN TRUST MORTGAGE COMPANY V. K&B DOOR COMPANY CASE INCORPORATED CASE, IN	0.10	16.50
	CSW L250	A104	PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ROYAL INDEMNITY COMPANY V. SPECIAL SERV. SUPPLY COMPANY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE.	0.10	16.50
	CSW L250	A104	(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AVIATION VENTURES INC V. JOAN MORRIS INC CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE. (ALL PRECEDING MOTION WORK AND FUTURE	0.10	16.50
	CSW L250	A103	MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE THE BUILDER'S INADMISSIBLE PAROL EVIDENCE. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00 33.00
01/10/2019	PCB L130	A109	APPEAR FOR/ATTEND CONFERENCE CALL WITH CLIENT'S STRUCTURAL AND METALURGICAL EXPERTS RE:	0.20	33.00
	PCB L120	A104	(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE LATEST INFORMATION FROM THE HOA ON ITS CLAIMS AS PART OF THE OVERALL ASSESSMENT OF WHEN TO FILE VARIOUS MOTIONS (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.20	37.00
	CSW L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) PLAINTIFF/COUNTER-DEFENDANTS' MOTION FOR DECLARATORY RELIEF REGARDING STANDING, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE	0.10	18.50
			0120	AA3314	

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		Hours	
CSW L250 A104	AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AFFIDAVIT OF PETER C. BROWN AS PART OF PLAINTIFFS/COUNTER-DEFENDANTS' MOTION FOR DECLARATORY RELIEF REGARDING STANDING, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S	0.20	33.00
CSW L250 A104	COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PANORAMA TOWERS CONDO UNIT OWNERS ASSOCIATION'S CHAPTER 40 NOTICE (51 PAGES)-EXHIBIT A, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE	0.05	8.25
CSW L250 A104	56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PANORAMA TOWERS CONDO UNIT OWNERS' ASSOCIATION'S AMENDED NOTICE OF CLAIMS PURSUANT TO NRS 40.645 (EXHIBIT B), SPECIFICALLY RELATING TO THE RESIDENTIAL TOWER WINDOWS (50	0.15	24.75
CSW L250 A104	PAGES), IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE UNIFORM DECLARATORY JUDGMENTS ACT	0.20	33.00
CSW L250 A104	NRS 30.010, , IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE KRESS V. COREY, IN PREPARATION FOR	0.05	8.25
	DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PLANNED PARENTHOOD ASSOCIATION V. FITSPATRICK CASE, IN PREPARATION FOR DRAFTING	0.05	8.25
CSW L250 A104	OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE COUNTY OF CLARK EX REL UNIVERSITY	0.10	16.50
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				Hours	
			MEDICAL CENTER V. UPCHURCH CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER,	nouis	
CSW	L250	A104	SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NRS 116.3102(1)(D), IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK	0.05	8.25
			A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE		
CSW	L250	A104	PER ADJUSTER) REVIEW/ANALYZE (BEGIN) CC&RS FOR PANORAMA TOWERS I AND II, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F)	0.05	8.25
			CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
CSW	L250	A104	REVIEW/ANALYZE STATUTES CHAPTER 116, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY		
CSW	L250	A104	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AAMA GLOSSARY (EXHIBIT E), IN	0.05	8.25
			PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
CSW	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AFFIDAVIT OF SIMON LOADSMAN (EXHIBIT F), IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL	0.10	16.50
			PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE INTERNATIONAL BUILDING CODE 2000 (EXHIBIT G), IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE, IN PREPARATION FOR DRAFTING OPPOSITION		
			TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
CSW	L250	A104	BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TEXAS WALL SYSTEM DROP SHOP DRAWINGS (EXHIBIT H), IN PREPARATION FOR DRAFTING	0.10	16.50
			OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
CSW	L250	A104	BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE DEFENDANT'S OPPOSITION TO	0.10	16.50
				A A 2216	

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				Hours	
			PLAINTIFFS/COUNTER-DEFENDANT'S MOTION FOR		
			DECLARATORY RELIEF REGARDING STANDING AND		
			COUNTERMOTIONS TO EXCLUDE INADMISSIBLE EVIDENCE		
			AND FOR RULE 56(F) RELIEF, IN PREPARATION FOR DRAFTING		
			OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE		
			56(F) CONTINUANCE AND EXCLUDE BUILDER'S INADMISSIBLE		
			PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND		
			FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
			ADJUSTER)	0.20	33.00
CSW	L250	A104	REVIEW/ANALYZE THE UNIFORM COMMON-INTEREST		
			OWNERSHIP ACT AND NRS CHAPTER 116, IN PREPARATION		
			FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO		
			SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION		
			WORK AND FUTURE MOTION WORK APPROVED BY		
			ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.40	10.50
CCM	1.250	A 1 O 1	TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A 104	REVIEW/ANALYZE PLAINTIFF EXPERT KARIGER'S DECLARATION ABOUT WATER LEAKAGE DUE TO MISSING SILL		
			PAN FLASHINGS, IN PREPARATION FOR DRAFTING		
			OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE		
			56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND		
			FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
			ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE PLAINTIFF EXPERT OMAR HINDIYEH'S		
			DECLARATION ABOUT WATER LEAKAGE BEING DUE TO		
			MISSING SILL PAN FLASHINGS, IN PREPARATION FOR		
			DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK		
			A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK		
			AND FUTURE MOTION WORK APPROVED BY ADJUSTER,		
			SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE		
			PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE SPECIAL MASTER FLOYD HALE'S AMENDED		
			CASE AGENDA GOVERNING DISCOVERY DEADLINES, IN		
			PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL		
			PRECEDING MOTION WORK AND FUTURE MOTION WORK		
			APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.05	8.25
CSW	L250	Δ104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE BALDONADO V. WYNN LAS VEGAS CASE, IN	0.03	0.23
COVV	L230	A10 4	PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL		
			PRECEDING MOTION WORK AND FUTURE MOTION WORK		
			APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
CSW	L250	A104	REVIEW/ANALYZE PUBLIC EMPLOYEES' BENEFITS PROGRAM		
			V. LAS VEGAS METROPOLITAN POLICE DEPARTMENT CASE, IN		
			PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL		
			PRECEDING MOTION WORK AND FUTURE MOTION WORK		
			APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
00			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE GORDON V. MCKEE CASE, IN PREPARATION		
			FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO		

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				SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION	Hours	
	CSW	L250	A104	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE MC MULTI-FAMILY DEVELOPMENT LLC V. CRESTDALE ASSOCIATES LTD CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S	0.05	8.25
	CSW	L250	A104	INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TRANS WESTERN LEASING CORPORATION V. CARRAO CONSTRUCTION COMPANY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE	0.20	33.00
	DRG	L120	A104	BUILDER'S INADMISSIBLE PAROLE EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EDEN HARRIS AT EXPERT MKA'S OFFICE, RE:	0.15	24.75
	DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) CONFERENCE CALL WITH EXPERTS, TRAILER MARTIN AND CONRAD CHRISTENSEN, RE:	0.05	8.25
	DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ORDER GRANTING STIPULATION TO EXTEND HEARING DATE AND PRE-HEARING HEADLINES ON MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING NOTICE OF ENTRY. (ALL PRECEDING MOTION WARDLY AND ELITING M	0.20	33.00
	DRG	L250	A103	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE NOTICE OF ENTRY ORDER GRANTING STIPULATION TO EXTEND HEARING DATE AND PRE-HEARING HEADLINES ON MOTION FOR DECLARATORY RELIEF. (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.05	8.25
01/11/2019	PCB	L130	A109	(SPLIT WITH TOWER II CASE PER ADJUSTER) APPEAR FOR/ATTEND CONFERENCE CALL WITH WINDOW FENESTRATION EXPERT AND COST ESTIMATING EXPERT RE:	0.05	8.25
	JWS	L120	A109	APPEAR FOR/ATTEND TELEPHONIC MEET AND CONFER/FOLLOW-UP DISCUSSION WITH DEFENSE EXPERTS RE:	0.45	83.25
	DRG	L340	A104	. PER ADJUSTER, TIME TO BE SPLIT WITH TOWER II CASE. REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MICHELLE ROBBINS, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45 0.05	83.25 8.25
				0142	AA3318	

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			0143	AA3319	
			ADJUSTER)	0.15	24.75
			MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CGVV	LZJU	A 104	CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE		
C.S.W	L250	A104	(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HIDDEN WELLS RANCH V. STRIP REALTY	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE BORGERSON V. SCANLON CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		-
			FOR DECLARATORY RELIEF, APPROPRIATENESS OF SAME UNDER CERTAIN CIRCUMSTANCES, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L250	A104	COURT, RULING ON MOTION FOR DECLARATORY RELIEF IN SIMILAR PRIOR CASE, QUEENSRIDGE HOA VERSUS PERINI, TO UTILIZE ARGUMENTS THEREIN TO OUR ADVANTAGE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) RECENT CASE HISTORY IN NEVADA, 9TH CIRCUIT AND OTHER COURTS, RE: MOTIONS	0.40	66.00
DRG	L250	A104	MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) FINDINGS OF FACT AND CONCLUSIONS OF LAW FROM DEPARTMENT 31 OF SAME	0.80	132.00
DRG	L250	A103	DRAFT/REVISE (BEGIN) MEMORANDUM TO FILE, RE: ANALYSIS OF ARGUMENTS PRESENTED IN OPPOSITION AND PROPOSED RESPONSES (ALL PRECEDING MOTION WORK AND FUTURE		
			DECLARATORY RELIEF AND EXHIBITS THERETO, RE: STANDING, ANALYZED ARGUMENTS IN ORDER TO PREPARE AN ANALYSIS OF OUR PROPOSED ARGUMENTS IN RESPONSE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.90	148.50
	L340 L250		DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) OPPOSITION TO MOTION FOR	0.05	8.25
	L340		REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MICHELLE ROBBINS, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	L340		DRAFT/REVISE CORRESPONDENCE TO EXPERT, MICHELLE ROBBINS, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DDC	1.040	4400	DDAFT/DEVICE CORRECTONDENCE TO EVERT MICHELLE	Hours	

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				Hours	
CSW	L250	A104	REVIEW/ANALYZE NEVADA REVISED STATUTE SECTION	riours	
			30.110, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F)		
			CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE		
			MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.05	8.25
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE BULBMAN, INC V. NEVADA BELL CASE,, IN	0.05	0.20
			PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		
			(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE COLLINS V. UNION FEDERAL SAVINGS AND		
			LOAN ASSOCIATION CASE,, IN PREPARATION FOR DRAFTING		
			OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND		
			FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CSW	1.250	Λ10 <i>1</i>	ADJUSTER) REVIEW/ANALYZE PARMAN V. PETRICCIANI CASE,, IN	0.10	16.50
CSVV	L230	A 104	PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		
			(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK		
			APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE POSADAS V. CITY OF RENO CASE,, IN	0.10	10.50
			PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		
			(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104			
			CENTER CASE,, IN PREPARATION FOR DRAFTING OPPOSITION		
			TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE		
			MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	2.42	
CSW	L250	Δ104	ADJUSTER) REVIEW/ANALYZE SHORT V. HOTEL RIVIERA INC. CASE,, IN	0.10	16.50
CSVV	L230	A 104	PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		
			(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK		
			APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
CSW	L250	A104	REVIEW/ANALYZE SAWYER V. SUGLARLESS SHOPS INC	0.00	0.20
			CASE,, IN PREPARATION FOR DRAFTING OPPOSITION TO		
			HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F)		
			CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
			BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
0014	1.050		ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE SARTOR V. ARKANSAS GAS CORP CASE,, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
			COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE		
				A A 2220	

			Hours	
CSW L250 <i>A</i>	Δ104	(ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NRCP 56(E), IN PREPARATION FOR	0.15	24.75
00W L230 /	1104	DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH		
CSW L250 A	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HENRY PRODUCTS INC V. TARMU CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL	0.05	8.25
		PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW L250 A	A104	REVIEW/ANALYZE SAKA V. SAHARA-NEVADA CORP CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK		
CSW L250 A	A104	APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HAVAS V. HUGHES ESTATE CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE	0.15	24.75
		BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW L250 A	A104	REVIEW/ANALYZE HALLMARK V. ELDRIDGE ĆASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL	0.10	10.00
CSW L250 A	A104	PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CALARDI V. NAPLES POLARIS CASE, IN	0.10	16.50
		PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)		
CSW L250 A	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ELLISON V. CAL STATE AUTO ASSOCIATION CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL	0.15	24.75
		PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW L250 A	4103	DRAFT/REVISE (BEGIN) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDERS' INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN		
JBV L320 <i>A</i>	A104	BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) DOCUMENTATION RECEIVED FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS	0.40	66.00
		& ASSOCIATES, RE: DEFENSE DOCUMENTATION AND VERIFYING DOCUMENTS ARE COMPLETE AND	A A 2221	

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				0146	AA3322	
				PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
	CSW	L250 /	A104	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE DICKENSON V. STATE DEPT OF WILDLIFE CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL	0.15	24.75
	CSW	L250 A	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE RINGLE V. BRUTON CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION	0.15	24.75
	CSW	L250 /	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE AND TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.45	74.25
	DRG	L250 /	A103	APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMORANDUM TO FILE, RE: ANALYSIS OF ARGUMENTS PRESENTED IN OPPOSITION AND PROPOSED RESPONSES TO SAME (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.10	16.50
	DRG	L250 /	A104	SUPPORT OF MOTION FOR DECLARATORY RELIEF (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) ANALYSIS OF THE ASSOCIATION'S EXPERT'S RESUME AND AFFIDAVIT IN SUPPORT OF OPPOSITION TO MOTION FOR DECLARATORY RELIEF, TO DETERMINE HIS INVOLVEMENT WITH AAMA, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK	0.10	16.50
	DRG	L250 /	A104	REPLY IN SUPPORT OF MOTION (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) ONLINE ANALYSIS OF AAMA WEBSITE AND HISTORY, TO ESTABLISH IT'S CREDIBILITY OF ASSOCIATION, IN PREPARATION FOR DRAFTING REPLY IN	0.40	66.00
	DRG	L250 /	A104	PROPOSED RESPONSES TO SAME (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) ANALYSIS OF AAMA GLOSSARY AND TERMS PRESENTED IN OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING	0.80	132.00
01/12/2019	DRG	L250 /	A103	VIEWABLE/LEGIBLE, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS. DRAFT/REVISE (CONTINUE) MEMORANDUM TO FILE, RE: ANALYSIS OF ARGUMENTS PRESENTED IN OPPOSITION AND	0.45	42.75
					Hours	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

01/13/2019

				Hours	
CSW	L250	A104	REVIEW/ANALYZE DEFENDANT'S EXPERT HINDIYEH DECLARATION (EXHIBITS 1 AND 2), IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY		
CSW	L250	A104	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NEVADA REVISED STATUTE SECTION 116.2102(1), IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK	0.15	24.75
CSW	L250	A104	APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HALIMI V. H.R. BLACKETOR CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (SPLIT WITH	0.05	8.25
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) AAMA GLOSSARY (EXHIBIT E OF BUILDER'S MOTION: 63 PAGES), IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	0.15	24.75
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) AFFIDAVIT OF BUILDER'S EXPERT SIMON LOADSMAN, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.15	24.75
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) DECLARATION OF CC&RS, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19)	0.10	16.50
CSW	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER	0.10	16.50
			ADJUSTER)	0.85	140.25
	L250		REVIEW/ANALYZE SUMMERFELD V. COCA COLA BOTTLING COMPANY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AMERITRADE INC. V. FIRST INTERSTATE BANK CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.15	24.75
			ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH	Λ Λ 2272	

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			TOWER HOLDER PER AR HISTER)	Hours	04.75
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AMERITRADE INC. V. FIRST INTERSTATE BANK CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION	0.15	24.75
CSW	L250	A104	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NRS 116, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN	0.15	24.75
CSW	L250	A104	BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE FRANCES T V. VILLAGE GREEN OWNERS	0.20	33.00
			ASSOCIATION CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE RUTH E ABERS V. CHRISTINE MARIE ROUNSAVELL CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDERS INADMISSIBLE BAROLE	0.10	16.50
			OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER		
CSW	L250	A104	EXECUTIVE PLAZA, LLC CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.10	16.50
CSW	L250	A104	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE KALDI V. FARMERS INSURANCE EXCHANGE CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK	0.05	8.25
CSW	L250	A104	APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE MASSIE V. CHATOM CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.05	8.25
CSW	L250	A104	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE KHAN V. BAKHSH CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY	0.05	8.25
CSW	L250	A104	ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE UNITED STATES HOME CORP V. BALLESTEROS TRUST CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE	0.05	8.25
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01/14/2019

				Hours	
CSW	L250	A104	V. PINNACLE MARKET DEVELOPMENT CASE, IN PREPARATION	0.15	24.75
CSW	L250	A104	FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROLE EVIDENCE (ALL PRECEDING MOTION WORK AND	0.10	16.50
CSW	L250	A104	FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND FUTURE MOTION WORK	0.35	57.75
CSW	L250	A104	APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NRCP 56, IN PREPARATION OF DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION WORK AND	0.30	49.50
CSW	L250	A104	FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CHOY V. AMERISTAR CASINOS INC CASE, IN PREPARATION OF DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL	0.05	8.25
CSW	L250	A104	PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ANDERSON V. WELLS CARGO INC CASE, IN PREPARATION OF DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL	0.10	16.50
CSW	L250	A104	PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HARRISON V. FALCON PRODUCTS INC CASE, IN PREPARATION OF DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL	0.10	16.50
CSW	L250	A104	PRECEDING MOTION WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE DECLARATION OF MICHAEL GAYAN (EXHIBIT 3 OF DEFENDANT'S OPPOSITION), IN PREPARATION OF DRAFTING OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (ALL PRECEDING MOTION	0.15	24.75
PCB	L250	A104	WORK AND FUTURE MOTION WORK APPROVED BY ADJUSTER, SHERILYN BRYDON, ON 1.24.19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PROPOSED STIPULATION AND ORDER	0.10	16.50

		Hours	
	REGARDING THE TIMING FOR PLEADINGS AND THE HEARING ON THE MOTION FOR RECONSIDERATION, CONSIDER HOW IT MIGHT BE USED BY THE HOA, AS CURRENTLY DRAFTED, TO SLIP IN A MOTION FOR RECONSIDERTION OF ITS OWN AS A COUNTER-MOTION, AND DRAFT EMAIL TO COUNSEL FOR THE	Hours	
PCB L390 A104	HOA REQUESTING CLARIFICATION OF THE HOA'S INTENT. REVIEW/ANALYZE VARIOUS FILINGS AND FILE DOCUMENTS IN PREPARATION FOR TODAY'S SPECIAL MASTER HEARING, INCLUDING OUTLINING ISSUES THAT SHOULD BE ADDRESSED BY THE SPECIAL MASTER WITH REGARD TO INSPECTIONS, TESTING, AND THE UPCOMING HEARINGS OF VARIOUS MOTIONS (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH	0.15	27.75
PCB L250 A107	OTHER FILE IN SAME CASE - TOWER II). COMMUNICATE (OTHER OUTSIDE COUNSEL) WITH COUNSEL FOR THE HOA RE: DISCUSSION OF THE INTENDED SCOPE OF THE OPPOSITION TO THE MOTION FOR RECONSIDERATION AND THE CONCERN THAT THE HOA WILL ATTEMPT TO FILE AN UNTIMELY COUNTER-MOTION FOR RECONSIDERATION (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN	0.15	27.75
PCB L390 A109	SAME CASE - TOWER II). APPEAR FOR/ATTEND SPECIAL MASTER HEARING (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME	0.05	9.25
PCB L390 A109	CASE - TOWER II). APPEAR FOR/ATTEND SPECIAL MASTER HEARING - SEPARATE TRAVEL TIME (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II; AS PER CARRIER	0.25	46.25
JBV L320 A104	GUIDELINES - TIME BILLED AT 1/2 ACTUAL RATE). REVIEW/ANALYZE (CONTINUE) DOCUMENTATION RECEIVED FROM CLIENT'S EXPERT, SHELLY ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE:	0.45	41.62
PCB L250 A101	PLAN AND PREPARE (CONTINUE) FOR PREPARATION OF REPLY BRIEF IN SUPPORT OF MOTION FOR DECLARATORY RELIEF AND ANTICIPATED OPPOSITION TO MOTION FOR RECONSIDERATION RE: CONTINUE TO ASSESS POSSIBLE ARGUMENTS REGARDING HOW TO USE EXPERTS TO SUPPORT THE PLEADINGS TO BE FILED AND HOW BEST TO FRAME CERTAIN ARGUMENTS (AS PER CARRIER DIRECTIVE,	0.45	42.75
CSW L250 A104	TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE CROW-SPIEKER NO. 23 V. ROBINSON CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH	0.15	27.75
CSW L250 A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE RUSS V. GENERAL MOTORS CORP CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH	0.10	16.50
CSW L250 A104	TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW L250 A104	PER ADJUSTER) REVIEW/ANALYZE THOMSON V. CANYON CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE	0.10	16.50
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				Hours	
00111	1.050	A 4 O 4	BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE WIGMORE "EVIDENCE" TREATISE SECTION 2446 REGARDING PAROL EVIDENCE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S		
			INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE NEVERKOVEC V. FREDERICKS CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH		
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE LOWDEN INV CO. V. GENERAL ELECTRIC	0.15	24.75
			CREDIT COMPANY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE JACOBSEN V. BEST BRANDS INC CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE	0.10	24.73
CSW	1 250	Δ104	BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE GOLDEN PRESS V. PAC. FREEPORT	0.10	16.50
0011	2200	71101	WAREHOUSE CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL		
CSW	L250	A103	EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDERS' INADMISSIBLE	0.10	16.50
			PARO L EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.95	156.75
CSW	L250	A103	DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER		
CSW	L250	A103	ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S	0.85	140.25
			COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45	74.25
CSW	L250	A104	REVIEW/ANALYZE PINNACLE MUSEUM TOWER ASSN V. PINNACLE MARKET DEVELOPMENT CASE, IN PREPARATION		
			FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTIONS TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE RESTATEMENT (THIRD) OF THE LAW OF PROPERTY: SERVITUDE'S, IN PREPARATION FOR DRAFTING	55	
CSW	L250	A104	OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) OPPOSITION TO HOA'S	0.10	16.50
DDC	1.000		COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L230	A 104	REVIEW/ANALYZE CORRESPONDENCE FROM SPECIAL MASTER, RE: HOLDING CASE AGENDA IN ABEYANCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L230	A104	REVIEW/ANALYZE SERVICE NOTICE, RE; NOTICE OF UPCOMING SPECIAL MASTER HEARING (SPLIT WITH TOWER II	0.05	Q 2E
DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM FRANCIS LYNCH, RE: STIPULATION AND ORDER REGARDING MOTION	0.05	8.25

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			FOR RECONSIDERATION DEADLINES (SPLIT WITH TOWER II	Hours	
			CASE PER ADJUSTER)	0.05	8.25
01/15/2019	DRG L230	A104	REVIEW/ANALYZE CORRESPONDENCE FROM DEFENDANTS TO THE COURT, RE: PROPOSED STIPULATION AND LETTER PROVIDING BASIS FOR SAME REGARDING EXTENSION OF HEARING ON MOTION FOR RECONSIDERATION OF THE COURT'S PRIOR ORDER (SPLIT WITH TOWER II CASE PER		
	DRG L250	A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) BALDONADO CASE, CITED TO IN ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, IN ORDER TO DISTINGUISH, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF SAME	0.10	16.50
	DRG L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) PUBLIC EMPLOYEES' BENEFITS PROGRAM CASE, CITED TO IN ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, IN ORDER TO DISTINGUISH, IN PREPARATION FOR DRAFTING REPLY IN	0.15	24.75
			SUPPORT OF SAME (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
	DRG L250	A104	REVIEW/ANALYZE (CONTINUE) COX V GLENBROOK CASE, CITED TO IN ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, IN ORDER TO DISTINGUISH, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF SAME		
	DRG L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE RECENT 5TH CIRCUIT APPELLATE DECISIONS AND NEVADA SUPREME COURT DECISIONS, REGARDING SELF-SERVING EVIDENCE IN MOTIONS FOR SUMMARY JUDGMENT, IN ORDER TO REFUTE ARGUMENTS RAISED IN OPPOSITION, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF	0.20	33.00
	DRG L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) ARGUMENTS TO RAISE IN REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF (SPLIT	0.45	74.25
	CSW L250	A104	WITH TOWER II CASE PER ADJUSTER).	0.40	66.00
	CSW L250	A104	TESTIMONY IN THE ASSOCIATION'S OPPOSITION, IN PREPARATION (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE SCHNEIDER V. CONTINENTAL ASSURANCE COMPANY CASE, IN PREPARATION FOR DRAFTING	0.15	24.75
	CSW L250	A104	OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE BAUGHMAN & TURNER INC V. JORY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE	0.10	16.50
	CSW L250	A104	BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE POLK V. MACMILLAN CASE, IN	0.10	16.50
	GGVV L230	A 104	PREPARATION FOR DRAFTING OPPOSITION TO EXCLUDE BUILDER'S INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
	CSW L250	A104	REVIEW/ANALYZE CLAUSON V. LLOYD CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE	0.10	10.00
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
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01/16/2019

				Hours	
CSW	L250	A104	REVIEW/ANALYZE GUNLORD CORP. V. BOZZANO CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S		
CSW	L250	Δ104	COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE DREDGE CORP V. HUSITE COMPANY CASE,	0.10	16.50
0011	2200	7110-1	IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE		
CSW	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE SUMMERFIELD V. COCA COLA BOTTLING	0.10	16.50
			COMPANY CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER		
CSW	L250	A104	ADJUSTER)	0.20	33.00
			CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F)	0.00	00.00
CSW	L250	A103	CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE	0.20	33.00
CSW	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S	0.45	74.25
CSW	1.250	A104	COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE VELEZ V. AWNING WINDOWS INC CASE, IN	0.45	74.25
CSW	L230	A104	PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE		
CSW	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PATERSON-LEITCH CO. V. MASS. MUN.	0.10	16.50
			WHOLESALE ELEC. CO CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II		
CSW	L250	A104	CASE PER ADJUSTER)	0.10	16.50
			ET AL CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F)		
CSW	L250	A104	CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE WILMAR POULTRY COMPANY V. MORTON-NORWICH PRODUCTS CASE, IN PREPARATION FOR	0.15	24.75
			DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II		
CSW	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE ORDER FROM COURT GRANTING IN PART DEFENDANT'S MOTION TO CONTINUE FROM CAMPAGNOLO	0.10	16.50
			SRL V. FULL SPEED AHEAD INC CASE, IN PREPARATION FOR DRAFTING OPPOSITION TO HOA'S COUNTERMOTION'S TO		
			SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L250	A104	REVIEW/ANALYZE SIERRA GLASS CONTRACT DOCUMENTATION, TO IDENTIFY SIERRA GLASS' SCOPE OF		
			WORK, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING		
DRG	L250	A104	STANDING (SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE CC&R'S, IN ORDER TO EVALUATE DEFINITIONS AND TERMS PIECED TOGETHER IN THE	0.65	107.25
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01/17/2019

				Hours	
			ASSOCIATION'S OPPOSITION TO OUR MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING		
CSW	L250	A103	REPLY TO SAME (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S	0.35	57.75
			COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.80	132.00
CW	L320	A104	REVIEW/ANALYZE HOA'S DOCUMENTS PRODUCED IN PRIOR	0.60	132.00
			LITIGATION RE: TO DETERMINE WHEN THE REPAIRS WERE PERFORMED TO THE WINDOWS AND WHICH ENTITY		
			PERFORMED SAID REPAIRS IN PREPARATION TO DRAFT		
			INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS AND A SUBPOENA DUCES TECUM. [AS PER		
			CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
CW	1 220	A 10.4	CASE - TOWER II]	0.80	76.00
CW	L320	A 104	REVIEW/ANALYZE NEVADA SECRETARY OF STATE DATABASE RE: TO OBTAIN THE REGISTERED AGENT INFORMATION FOR		
			MC CONSULTANTS AND ANY ENTITIES ASSOCIATED WITH		
			THEM IN PREPARATION TO DRAFT A SUBPOENA DUCES TECUM TO REQUEST ALL DOCUMENTS RELATED TO THE		
			REPAIR WORK PERFORMED ON THE WINDOWS. [AS PER		
			CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II]	0.15	14.25
CW	L320	A103		0.13	14.20
			CONSULTANTS RE: TO REQUEST ALL DOCUMENTS RELATED		
			TO THEIR REPAIR WORK ON THE WINDOWS. [AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
			CASE - TOWER II]	0.10	9.50
CW	L320	A103	DRAFT/REVISE CLIENTS' FIRST SET OF INTERROGATORIES TO THE HOA RE: REQUEST FOR INFORMATION PERTAINING TO		
			THE COMPANY WHO PERFORMED THE REPAIR WORK TO THE		
			WINDOWS AFTER THE PRIOR LITIGAITON ENDED. [AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME		
			CASE - TOWER II]	0.10	9.50
CW	L320	A103	DRAFT/REVISE CLIENTS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE HOA RE: REQUEST		
			FOR DOCUMENTS PERTAINING TO THE COMPANY WHO		
			PERFORMED THE REPAIR WORK TO THE WINDOWS AFTER		
			THE PRIOR LITIGAITON ENDED. [AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE - TOWER II]	0.10	9.50
ID) (·		
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0073401-74755), RE: DETERMINING IF ANY		
			DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND		
			SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING		
			RELATING TO MANUFACTURING OF THE WINDOWS, IN		
JBV	L320	Δ104	PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR	0.65	61.75
051	L020	71101	LITIGATION (D 0074756-75898), RE: DETERMINING IF ANY		
			DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING		
			RECORDS, PAYMENT DOCUMENTATION AND ANYTHING		
			RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.55	52.25
JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR	0.55	JZ.ZJ
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Statement No:

			0155	AA3331	
			CASE PER ADJUSTER)	0.30	49.50
			MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
5.10		,1104	FOR ASSOCIATION IN SUPPORT OF OPPOSITION, RE: IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF		
DRG	L250	A104	REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AFFIDAVIT OF OMAR HINDIYEH, ATTORNEY	0.15	24.75
DRG	L250	A104	REVIEW/ANALYZE AFFIDAVIT OF MICHAEL GAYAN, ATTORNEY FOR ASSOCIATION IN SUPPORT OF ARGUMENT FOR NRCP 56 RELIEF, RE: IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF		
DPG	1.250	A10 <i>1</i>	OMAR HINDIYEH AS AN EXHIBIT TO HIS DECLARATION IN SUPPORT OF OPPOSITION, ANALYSIS OF PROVISION THAT SUPPORT OUR SIDE, RE: IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.40	66.00
DRG	L250	A104	BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TRAINING MANUAL PROVIDED BY EXPERT, SIMON LOADSMAN, IN CONTRAST TO TRAINING MANUAL PROVISIONS PROVIDED BY THE ASSOCIATION'S EXPERT,	0.05	8.25
DRG	L250	A104	BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE GORDON V MCKEE CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED	0.10	16.50
DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE LIEN RELEASE IN FAVOR OF TEXAS WALL SYSTEMS WINDOW MANUFACTURER, RE: IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED	0.05	8.25
DRG	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE STIPULATION AND ORDER TO EXTEND HEARING DEADLINE FOR MOTION FOR RECONSIDERATION, IN PREPARATION FOR SAME (SPLIT WITH TOWER II CASE PER	0.30	49.50
CSW	L120	A103	COUNTERMOTION TO SEEK A RULE 56(F) CONTINUANCE (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH	0.15	24.75
CSW	L250	A103	SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S	0.70	66.50
JBV	L320	A104	LITIGATION (D 0075899-76993), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (D 0076994-78227), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND	0.60	57.00
			LITIOATION (DOGTTOOD TOOD), DE DETERMINIQUE ANN	Hours	

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					Hours	
	DRG	L250	A104	REVIEW/ANALYZE SAKA V. SAHARA NEVADA CORP CASE, AS CITED TO IN THE ASSOCIATION'S OPPOSITION, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
	DRG	L250	A103	CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00 66.00
01/18/2019	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER I-PREVIOUSLY REVIEWED MATERIALS WITHIN DRAWS AND LIEN RELEASE DOCUMENTATION DISCS), RE: COMPILING DOCUMENTATION RELATING TO TEXAS WALL	0.40	00.00
				SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS FOUND DURING PREVIOUS SEARCH, IN PREPARATION FOR PROVIDING ATTORNEY, AS REQUESTED.	0.40	38.00
	JBV	L320	A104	REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (TOWER II-PREVIOUSLY REVIEWED MATERIALS WITHIN DRAWS AND LIEN RELEASE DOCUMENTATION DISCS), RE: COMPILING DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PURCHASE ORDERS, ACCOUNTING RECORDS, PAYMENT DOCUMENTATION AND ANYTHING RELATING TO MANUFACTURING OF THE WINDOWS FOUND DURING PREVIOUS SEARCH, IN PREPARATION FOR		
	JBV	L320	A104	PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (PLANS: D 0019508-19634), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PLANS REFLECTING INSTALLATION OF WINDOWS AS WELL AS POTENTIAL MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR	0.55	52.25
	JBV	L320	A104	PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (PLANS: D 0019635-19751), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PLANS REFLECTING INSTALLATION OF WINDOWS AS WELL AS POTENTIAL MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR	0.60	57.00
	JBV	L320	A104	PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (PLANS: D 0019752-19859), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PLANS REFLECTING INSTALLATION OF WINDOWS AS WELL AS POTENTIAL MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR	0.55	52.25
	JBV	L320	A104	PROVIDING ATTORNEY, AS REQUESTED. REVIEW/ANALYZE (CONTINUE) DOCUMENTS FROM PRIOR LITIGATION (PLANS: D 0019860-19949), RE: DETERMINING IF ANY DOCUMENTATION RELATING TO TEXAS WALL SYSTEMS AND SIERRA GLASS SUCH AS PLANS REFLECTING INSTALLATION OF WINDOWS AS WELL AS POTENTIAL	0.45	42.75
					Λ Λ 2222	

				Hours	
			MANUFACTURING OF THE WINDOWS, IN PREPARATION FOR	riours	
			PROVIDING ATTORNEY, AS REQUESTED.	0.40	38.00
CSW	L250	A104		5.1.5	00.00
			BUILDER'S MOTION FOR SUMMARY JUDGMENT PURSUANT TO		
			NRS 11.202(1) FROM BYRNE V. SUNRIDGE HEIGHTS CASE, IN		
			ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.45	74.25
CSW	L250	A104			
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT		
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II		
			CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE NRS 40.695, IN ORDER TO CRAFT LEGAL		
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT		
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II		~
00144		4 4 9 4	CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE JAMES HUNTER & CO V. TRUCKEE LODGE		
			CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION		
			FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE	0.45	04.75
CCIM	1.050	A 4 O 4	(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE HOWARD V. WAALE-CAMPLAN & TIBERTI INC CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR		
			MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF		
			REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	1 250	Δ104	REVIEW/ANALYZE BLDG & CONSTRUCTION TRADES V. PUBLIC	0.13	24.70
0011	L200	7110-	WORKS CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR		
			MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF		
			REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE BLDG & CONSTRUCTION TRADES V. PUBLIC	00	
			WORKS CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR		
			MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF		
			REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104			
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II		
			CASE PER ADJUSTER)	0.65	107.25
CSW	L250	A104	REVIEW/ANALYZE (CONTINUE) PLAINTIFF'S OPPOSITION TO		
			DEFENDANT LAND WEST BUILDER'S MOTION FOR SUMMARY		
			JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V.		
			SUNRIDGE HEIGHTS CASE, IN ORDER TO CRAFT	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE DR HORTON INC V. EIGHTH JUDICIAL		
			DISTRICT COURT CASE, IN ORDER TO CRAFT LEGAL		
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT		
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II	0.40	40.50
CCM	1.250	A 1 O 1	CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A 104	REVIEW/ANALYZE BARRETT V. EIGHTH JUDICIAL DISTRICT COURT CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR		
			MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF		
			REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L 250	A104		0.10	10.00
0011	LZOO	71101	IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE LOPEZ V. US HOME CORP, IN ORDER TO		-
			CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY		
			JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH		
				۸ ۸ 2 2 2 2	

				Hours	
CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE G & H ASSOCIATES V. ERNEST W. HAHN INC CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR	0.15	24.75
DPC	L340	A108	MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
DNG	L340	A 100	TRAILER MARTIN, STRUCTURAL EXPERT, RE: (SPLIT WITH TOWER II CASE PER		
DRG	L340	A104	ADJUSTER) REVIEW/ANALYZE EXPERT, TRAILER MARTIN'S, RESUME AND CREDENTIALS, IN PREPARATION FOR DRAFTING A DECLARATION IN SUPPORT OF OUR REPLY BRIEF IN	0.10	16.50
DRG	L340	A103		0.20	33.00
DRG	L340	A103	REPLY BRIEF IN SUPPORT OF MOTION FOR DECLARATORY RELIEF (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, TRAILER	0.20	33.00
DRG	L340	A104	MARTIN, RE: (MOTION APPROVED BY ADJUSTER ON 1-24-19) ((SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT,	0.05	8.25
			TRAILER MARTIN, RE: (MOTION APPROVED BY ADJUSTER ON 1-24-19) ((SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A103	DRAFT/REVISE (CONTINUE) DECLARATION IN SUPPORT OF OUR REPLY BRIEF IN SUPPORT OF MOTION FOR DECLARATORY RELIEF (MOTION APPROVED BY ADJUSTER		
DRG	L340	A103	ON 1-24-19) ((SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, TRAILER MARTIN, RE:	0.10	16.50
DRG	L340	A103	(MOTION APPROVED BY ADJUSTER ON 1-24-19) ((SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE FOLLOW UP CORRESPONDENCE TO EXPERT, TRAILER MARTIN, RE:	0.05	8.25
DRG	L250	A104	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PROJECT FILES AND PLANS, RE: TO LOCATE PLANS FOR THE UNIT 300, WHICH UNDERWENT REPAIRS, IN ORDER TO SEND TO STRUCTURAL EXPERT,	0.05	8.25
			TRAILER MARTIN, SO HE CAN EVALUATE WHAT CONSTITUTES STRUCTURAL COMPONENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER		
DRG	L340	A103	ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SHELLY ROBBINS, RE:	0.55	90.75
				A A 2224	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

01/19/2019

				Hours	
DRG	L340	A104	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE AMENDED CHAPTER 40 NOTICE, RE: IDENTIFICATION OF PHOTOS TO SUBMIT TO EXPERT, TRAILER MARTIN, TO AID HIS ANALYSIS OF STRUCTURAL VERSUS NON-STRUCTURAL COMPONENTS OF BUILDING IN	0.15	24.75
DRG	L340	A104	PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
DRG	L340	A103	OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE FOLLOW UP CORRESPONDENCE TO EXPERT, TRAILER MARTIN, RE:	0.10	16.50
DRG	L340	A104	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
DRG	L340	A108	IN ITS OPPOSITION, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH SIMON LOADSMAN, RE:	0.90	148.50
DRG	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) AFFIDAVIT OF SIMON LOADSMAN IN SUPPORT OF REPLY IN SUPPORT OF MOTION FOR	0.60	99.00
DRG	L250	A103	DECLARATORY RELIEF (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE:	0.25	41.25
			(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
	L250		REVIEW/ANALYZE NRCP 56(E), IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE S. HIGHLANDS COMMUNITY ASSOCIATION V. SAN FLORENTINE AVENUE TR CASE, IN ORDER TO CRAFT	0.05	8.25
			LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT	A A 2225	

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				Hours	
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II		
00144	1.050	A 4 O 4	CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE ALBIOS HORIZON COMMUNITIES INC CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	,		
			COMMUNITIES INC CASE, IN ORDER TO CRAFT LEGAL		
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT		
			REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II	0.05	0.05
CSW	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE ALSENZ V. TWIN LAKES VILL INC CASE, IN	0.05	8.25
0011	L230	A10 1	ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	· · · · · · · · · · · · · · · · · · ·		
			ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE	0.40	40.50
CSW	1.250	۸104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE EXHIBITS A, B, AND E FROM PLAINTIFF'S	0.10	16.50
CSVV	L230	A104	OPPOSITION TO DEFENDANT LAND WEST BUILDER'S MOTION		
			FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1)		
			FROM BYRNE V. SUNRIDGE HEIGHTS CASE, IN ORDER TO		
			CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY		
			JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH		
00144	1.050	A 4 O 4	TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE (CONTINUE) DEFENDANT LAND WEST BUILDER'S MOTION FOR SUMMARY JUDGMENT PURSUANT TO		
			NRS 11.202(1) FROM BYRNE V. SUNRIDGE HEIGHTS CASE, IN		
			ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR		
			SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE		
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
CSW	L250	A103	,		
			COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE		
			PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L 250	A104	,	0.33	31.13
DINO	L200	71104	TOWERS, AKA DECLARATION, RE: ANALYSIS OF PROVISIONS		
			UTILIZED BY ASSOCIATION IN OPPOSITION, TO EVALUATE		
			BASIS FOR THEIR INCLUSION AND ARGUMENTS AGAINST		
			THEIR USE OR MANNER OF USE, IN PREPARATION FOR		
			DRAFTING REPLY IN SUPPORT OF MOTION FOR		
			DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER		
			ADJUSTER ON 1-24-19) (SPLIT WITH TOWER IT CASE FER ADJUSTER)	0.65	107.25
DRG	L250	A104	REVIEW/ANALYZE NEVADA TREATISES, PRACTICE GUIDES	0.00	107.20
			AND NRCP 56, RE: COURT'S ABILITY TO EVALUATE		
			CREDIBILITY OF EXPERT WITNESS AFFIDAVITS IN A MOTION		
			FOR SUMMARY JUDGMENT, TO ATTACK ARGUMENTS		
			PRESENTED BY THE ASSOCIATION IN THEIR OPPOSITION TO		
			OUR MOTION FOR DECLARATORY RELIEF ON STANDING, IN PREPARATION FOR DRAFTING A REPLY IN SUPPORT	0.45	74.25
DRG	L 250	A104	REVIEW/ANALYZE HIDDEN WELLS RANCH V. STRIP REALTY	U. 4 0	14.20
2.10		, , , , ,	CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT		
			OF MOTION FOR DECLARATORY RELIEF ON STANDING		
				A A 2226	

					Hours	
	DD0	1.050	4404	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
	DRG	L250	A104	REVIEW/ANALYZE WOOD V SAFETY INC. CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.30	49.50
	DRG	L250	A104	REVIEW/ANALYZE BULBMAN V. NEVADA BELL CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)		
				(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
01/20/2019	DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SHELLY ROBBINS, RE: RESPONSE TO INQUIRY REGARDING PLANS AND STRUCTURALS TO SUBMIT TO EXPERT, TRAILER MARTIN (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L340	A103	ROBBINS, RE: CONFIRMATION OF RECEIPT OF RESPONSE TO INQUIRY REGARDING PLANS AND STRUCTURALS TO SUBMIT TO EXPERT, TRAILER MARTIN (SPLIT WITH TOWER II CASE	0.05	0.05
	DRG	L250	A104	PER ADJUSTER) REVIEW/ANALYZE BORGERSON V. SCANLON CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)	0.05	8.25
	DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) HIDDEN WELLS RANCH V. STRIP REALTY CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY	0.20	33.00
	DRG	L250	A104	ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE COLLINS V. UNION FEDERAL SAVINGS &	0.10	16.50
				LOAN CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)	6.45	04.75
	DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ADAMSON V. BOWKER, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER	0.15	24.75
	DRG	L250	A104	ADJUSTER) REVIEW/ANALYZE WINN V. SUNRISE HOSPITAL & MEDICAL CENTER CASE, AS CITED IN THE ASSOCIATION'S OPPOSITION, TO COUNTER ARGUMENTS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)	0.20	33.00
	DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ALVARADO V. MCCOY CASE, IN	0.15	24.75
				04.64	AA3337	

				Hours	
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
550	1.050	1.10.1	APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L250	A104	VEGAS LLC CASE, ÎN PREPARÁTION FOR DRAFTING REPLY IN		
			SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)		
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE OVERVIEW OF NEVADA AND FOREIGN	0.10	16.50
			CASE LAW REGARDING PROPRIETY OF MOTIONS FOR DECLARATORY RELIEF OVER SUMMARY JUDGMENT MOTIONS,		
			IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.70	445.50
DRG	L250	A103	CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) REPLY IN SUPPORT OF MOTION	0.70	115.50
			FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE BALIOTIS V. CLARK COUNTY CASE, IN	0.30	49.50
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.45	04.75
DRG	L250	A104	· ·	0.15	24.75
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L250	A104	REVIEW/ANALYZE OVERVIEW OF RECENT NEVADA CASE LAW REGARDING FAILURE TO OPPOSE ARGUMENTS IS DEEMED		
			AN ADMISSION, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON		
			STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L250	A104	REVIEW/ANALYZE (CONTINUE) AAMA GLOSSARY TO	0.20	33.00
			EVALUATE DEFINITIONS OF WINDOW UNITS, PAN FLASHINGS AND OTHER ITEMS INCLUDED IN GLOSSARY, IN ORDER TO		
			RESPOND TO ARGUMENTS PRESENTED BY THE ASSOCIATION IN ITS OPPOSITION, IN PREPARATION FOR DRAFTING REPLY		
			IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19)		
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE POSADAS V CITY OF RENO CASE, IN	0.35	57.75
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L250	A104	REVIEW/ANALYZE SARTOR V. ARKANSAS GAS CORP. CASE, IN	0.20	33.00
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION ARREDOVED BY ARREDOVED ON A CALLOW (OR LET MITTLE TOWER IN		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L250	A104	REVIEW/ANALYZE HENRY PRODUCTS INC. V. TARMU CASE, IN	AA3338	

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					Hours	
				PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.45	24.75
	DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE HARVIS V. HUGHES ESTATE CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.15	24.75
	DRG	L250	A103	CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING	0.15	24.75
				(APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.30	49.50
01/21/2019	PCB	L240	A104	REVIEW/ANALYZE LATEST DOCUMENTS AND AFFIDAVITS BEING PREPARED TO SUPPPORT THE REPLY BRIEF IN SUPPORT OF THE MOTION FOR DECLARATORY RELIEF AS TO STANDING, IN ORDER TO MAKE SURE THE DOCUMENTS AND AFFIDAVITS PROPERLY SUPPPORT THE ARGUMENTS THAT ARE BEING MADE IN THE REPLY BRIEF (AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER FILE IN SAME CASE -		
	JBV	L320	A104	TOWER II). REVIEW/ANALYZE CORRESPONDENCE FROM OPPOSING COUNSEL, RE: STIPULATION AND ORDER TO RESET HEARING, IN PREPARATION FOR ENSURING ATTORNEY HAS ALL NECESSARY DOCUMENTATION PRIOR TO ATTENDING ON	0.25	46.25
	JBV	L320	A104	CLIENT'S BEHALF. REVIEW/ANALYZE SPECIAL MASTER ORDER HOLDING CASE AGENDA IN ABEYANCE, RE: DETERMINING WHEN DISCOVERY DEADLINES WILL UPTAKE, IN PREPARATION FOR ENSURING	0.05	4.75
	CSW	L250	A104	CLIENT IS IN COMPLIANCE WITH ALL REQUIREMENTS. REVIEW/ANALYZE GOLDEN RD. MOTOR INN, INC. V. ISLAM CASE, IN PREPARATION FOR OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER	0.05	4.75
	CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE MATTATALL V. TRANSDERMAL CORP CASE, IN PREPARATION FOR OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER	0.20	33.00
	CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE HILTON HOTELS V. BUTCH LEWIS PRODUCTIONS CASE, IN PREPARATION FOR OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER'	0.20	33.00
	CSW	L250	A104	INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ROAD & HIGHWAY BUILDERS CASE, IN PREPARATION FOR OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE	0.15	24.75
	CSW	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) OPPOSITION TO HOA'S COUNTERMOTION TO EXCLUDE BUILDER' INADMISSIBLE PAROL EVIDENCE (SPLIT WITH TOWER II CASE PER	0.15	24.75
	CSW	L250	A104	ADJUSTER) REVIEW/ANALYZE WISE V. BECHTEL CORP CASE, IN ORDER	0.40	66.00
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				Hours	
			TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
CSW	L250	A104	REVIEW/ANALYZE NEVADA POWER V. METROPOLITAN DEV CO CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE LOTTER V. CLARK CO. BD OF COMMISSIONERS CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT	0.10	10.00
CSW	L250	A104	REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE TAHOE VILLAGE HOMEOWNERS V.	0.15	24.75
			DOUGLAS CO CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
CSW	L250	A104	REVIEW/ANALYZE (CONTINUE) PLAINTIFF'S OPPOSITION TO DEFENDANT LAND WEST BUILDER'S MOTION FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V.	0.10	10.50
			SUNRIDGE HEIGHTS CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II		
CSW	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE SB 105, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT	0.30	49.50
CSW	L250	A104	REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) PANORAMA TOWER	0.05	8.25
			CERTIFICATES OF OCCUPANCY, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II	0.40	16 E0
DRG	L340	A104	CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MICHELLE ROBBINS, RE:	0.10	16.50
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, MICHELLE ROBBINS, RE:	0.00	0.20
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MICHELLE ROBBINS, RE: (SPLIT WITH TOWER II CASE PER	0.05	0.05
DRG	L340	A104	ADJUSTER) REVIEW/ANALYZE THIRD FLOOR PLAN OF TOWER I, COMPARED THAT WITH PLANS IN CASE FILE FROM TOWER I, TO VERIFY WHICH PLANS CORRESPONDED WITH UNIT 300, IN	0.05	8.25
DRG	L340	A108	ORDER TO EVALUATE STRUCTURAL ELEMENTS OF UNIT 300 (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH	0.40	66.00
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				Hours	
			EXPERT, MICHELLE ROBBINS, RE:		
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, MICHELLE ROBBINS, RE:	0.15	24.75
DRG	L340	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MICHELLE ROBBINS, RE:	0.05	8.25
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, MICHELLE ROBBINS, RE:	0.05	8.25
DPG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MKA, RE:		
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, MKA, RE:	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MKA, RE:	0.05	8.25
DRG	L340	A104	. (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT,	0.05	8.25
DRG	L340	A108	TRAILER MARTIN, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH	0.05	8.25
			EXPERT, TRAILER MARTIN, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L340	A104	•		
			0165	AA3341	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

				Hours	
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER). REVIEW/ANALYZE ASSOCIATION'S ARGUMENTS IN RECENT OPPOSITION VERSUS AMENDED CHAPTER 40 NOTICE AND EXHIBITS, TO MOTION FOR DECLARATORY RELIEF ON STANDING, RE: ARGUMENTS REGARDING STRUCTURAL ASPECTS OF BUILDING IN COMPARISON TO ARGUMENTS PRESENTED BY EXPERT REGARDING BASIS FOR ARGUING THAT WATER INTRUSION IS CAUSING DAMAGE TO EXTERIOR WALLS, IN PREPARATION FOR DRAFTING AFFIDAVIT FOR TRAILER MARTIN, OUR STRUCTURAL EXPERT, IN REBUTTAL (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH	0.15	24.75
DRG	L340	A103	TOWER II CASE PER ADJUSTER).	0.30	49.50
DRG	L340	A103	DRAFT/REVISE SUPPLEMENTAL CORRESPONDENCE TO EXPERT, TRAILER MARTIN, RE:	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE IDENTIFIED LOCATIONS OF STRUCTURAL COMPONENTS OF THE BUILDING, TO SUBMIT TO STRUCTURAL EXPERT, IN SUPPORT OF HIS AFFIDAVIT TO SUPPORT ARGUMENTS REGARDING STRUCTURAL VERSUS NON-STRUCTURAL ELEMENTS OF BUILDING (SPLIT WITH	0.05	8.25
DRG	L340	A103	TOWER II CASE PER ADJUSTER) DRAFT/REVISE AFFIDAVIT OF TRAILER MARTIN, STRUCTURAL EXPERT, RE: (SPLIT WITH	0.05	8.25
DRG	L340	A103	TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, TRAILER MARTIN, RE:	0.30	49.50
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) AFFIDAVIT FROM EXPERT, SIMON LOADSMAN, RE:	0.25	41.25
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) CORRESPONDENCE TO SIMON LOADSMAN, RE: (SPLIT WITH	0.25	41.25
DRG	L340	A108	TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, TRAILER MARTIN, RE:	0.05 A A 3 3 4 2	8.25
				4441	

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Panorama Tower II 5143220827859X-A PANORAMA TOWER II

01/22/2019

				Hours	
DRG	L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE HOTEL RIVIERA V. SHORT CASE, IN	0.05	8.25
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE SATCHELL V. FED EX EXPRESS CASE, IN	0.30	49.50
			PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
DD0	1.050	A 404	APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L250	A104	REVIEW/ANALYZE HALLMARK V. ELDRIDGE CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.20	33.00
DRG	L250	A104	REVIEW/ANALYZE GALARDI V. NAPLES POLARIS, CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION		
			APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L250	A104	REVIEW/ANALYZE RINGLE V. BRUTON, CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF		
			MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
DRG	L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE EXEC. MGMT. V. TICOR TITLE INS. CO. CASE, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT	0.20	33.00
			OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH		
DRG	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE KALDI V. FARMERS INS. EXCHANGE CASE	0.20	33.00
			IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON STANDING (MOTION ADDROVED BY ADDRESS OF A CO. (CR. 17) MITTINGEN IN		
DRG	L250	Δ104	APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE COHEN-BREEN V. GRAY TV GROUP, INC.	0.30	49.50
BINO	2200	71101	EXCHANGE CASE IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF ON		
			STANDING (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L250	A103	DRAFT/REVISE (CONTINUE) REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING (APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II		
			CASE PER ADJUSTER)	0.65	107.25
JBV	L320	A104	REVIEW/ANALYZE EXHIBITS I, J, N, O AND P TO CLIENT'S REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF		
			REGARDING STANDING AND OPPOSITIONS TO DEFENDANT'S COUNTER-MOTIONS TO EXCLUDE INADMISSIBLE EVIDENCE AND FOR RULE 56(F) RELIEF, RE: ENSURING EACH EXHIBIT IS		
			MARKED ACCORDINGLY WITH BATES LABELS PURSUANT TO E.D.C.R. 2.27, IN PREPARATION FOR ENCLOSING WITH		
JBV	L320	A104	CLIENT'S REPLY, AS REQUESTED BY ATTORNEY. REVIEW/ANALYZE EMAIL CORRESPONDENCE FROM SHELLY	0.20	19.00
				A A 22 42	

			Hours	
JBV L	L320 A104	ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES, RE: OBTAINING PLANS FROM PROJECT, IN PREPARATION FOR PROVIDING ATTORNEY FOR ANALYSIS. REVIEW/ANALYZE PLANS RECEIVED FROM MADSEN, KNEPPERS & ASSOCIATES, RE:	0.05	4.75
PCB L	L240 A103	DRAFT/REVISE (CONTINUE) REPLY BRIEF IN SUPPORT OF MOTION FOR DECLARATORY RELIEF, AS WELL AS OPPOSITIONS TO THE HOA'S COUNTER-MOTIONS RE: ADDITIONAL ARGUMENTS DEALING WITH THE HOA'S RELIANCE ON AN AFFIDAVIT FROM AN EXPERT THAT DISREGARDS SPECIFIC ASPECTS OF THE DECLARATION FROM THE CC&RS, THE PROBLEMS WITH THE HOA'S	0.20	19.00
		ATTEMPTS TO CLAIM THAT THE WINDOW ISSUES SOMEHOW IMPACT THE STRUCTURAL INTEGRITY OF THE BUILDINGS, THE LACK OF ANY REAL EXPLANATION AS TO WHAT ADDITONAL DISCOVERY IS NEEDED BY THE HOA (ONE OF THE HOA'S COUNTER-MOTIONS), AND THE REASON WHY THE PAROL EVIDENCE RULE DOES NOT APPLY BECAUSE THE BUILDERS ARE NOT ATTEMPTING TO RE-WRITE THE DECLARATION (THE OTHER COUNTER-MOTION BY THE HOA)(AS PER CARRIER DIRECTIVE, TIME SPLIT WITH OTHER		
CSW L	L250 A10 ⁴	FILE IN SAME CASE - TOWER II). REVIEW/ANALYZE PLAINTIFFS LAURENT HALLIER STATEMENT OF WORK, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE	0.85	157.25
CSW L	L250 A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) AB 125 AS IT RELATES TO STATUTE OF REPOSE FOR ASSOCIATION'S TIMELINESS OF CLAIMS AGAINST CLIENT BUILDERS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER	0.10	16.50
CSW L	L250 A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) CHAPTER 40 NOTICE FROM ASSOCIATION, RE: VALIDITY OF CLAIMS PURSUANT TO NRCP SECTIONS AND AB 125, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF	0.20	33.00
CSW L	L250 A104	REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NEVADA COURT ODYSSEY WEBSITE, IN ORDER TO VERIFY TIMELINE OF IMPORTANT PLEADINGS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (SPLIT WITH	0.30	49.50
CSW L	L250 A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) BUILDER'S COMPLAINT AGAINST ASSOCIATION, IN ORDER TO VERIFY AND REFERENCE ASSERTIONS MADE AGAINST ASSOCIATION RELATED TO VIOLATIONS OF STATUTORY REPOSE PERIOD AND NRCP SECTIONS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE	0.15	24.75
CSW L	L250 A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE NRS 40.680, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING	0.35 A A 2244	57.75

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			STATUTE OF REPOSE (SPLIT WITH TOWER II CASE PER ADJUSTER)	Hours 0.05	8.25
CSW	L250	A103	DRAFT/REVISE (BEGIN) MEMO TO FILE		
CSW	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) MEMO TO FILE	0.45	74.25
DRG	L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) REPLY IN SUPPORT OF MOTION FOR DECLARATORY RELIEF REGARDING STANDING	0.55	90.75
DRG	L250	A103	(APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.85	140.25
DRG	L340	A108	(APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE:	0.80	132.00
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MKA, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A104	REVIEW/ANALYZE	0.00	0.20
DRG	L340	A104	CASE PER ADJUSTER) REVIEW/ANALYZE	0.05	8.25
DDO	1.040	1404	PLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
DRG	L340	A 104	REVIEW/ANALYZE OMAR HINDIYEH'S AFFIDAVIT IN CONJUNCTION WITH AMENDED CHAPTER 40 NOTICE, ANALYSIS OF COST ESTIMATES FOR TESTING AND INSPECTIONS ON WINDOWS, COMPARED WITH FIGURES		
DRG	L340	A103	PROVIDED IN THE ASSOCIATION'S EXPERT'S AFFIDAVIT. (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE AFFIDAVIT OF MICHELLE ROBBINS, ARCHITECTURAL EXPERT, RE:	0.10	16.50
DRG	L120	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE PLANS FOR TOWER I, UNIT 300 AND FLOOR PLAN, RE: ANALYSIS OF PLAN TO IDENTIFY MOST	0.30	49.50
			APPROPRIATE FLOOR PLAN FOR UNIT 300 GIVEN THE ARGUMENTS WE WANT TO MAKE IN THE CASE, TO SUBMIT TO EXPERT, MKA, FOR AFFIDAVIT IN SUPPORT OF THOSE		
DRG	L340	A103	ARGUMENTS (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE AFFIDAVIT OF ASHLEY ALLARD WITH	0.15	24.75
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			ATTACHED EXHIBITS, ARCHITECT WITH MKA WHO WAS PRESENT DURING PRIOR UNIT 300 REPAIRS, RE:	Hours	
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.35	57.75
DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, MKA, RE:	0.55	37.73
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) AFFIDAVIT IN SUPPORT OF SIMON LOADSMAN AND ARGUMENTS AS TO WHY FLASHINGS FORM	0.05	8.25
DRG	L340	A103	PART OF APERTURES (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE:	0.10	16.50
			(SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO EXPERT, MKA, RE: (SPLIT WITH TOWER II CASE PER		
DRG	L340	A104	ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE EXECUTED AFFIDAVIT OF SIMON LOADSMAN, RE: SPLIT WITH TOWER II CASE	0.05	8.25
DRG	L340	A103	PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE:	0.05	8.25
DRG	L340	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE EXECUTED AFFIDAVIT OF MICHELLE ROBBINS, RE:	0.05	8.25
DRG	L340	A108	(SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH ASHLEY ALLARD, RE:	0.05	8.25
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) AFFIDAVIT OF ASHLEY ALLARD, ARCHITECT WITH MKA WHO WAS PRESENT DURING PRIOR UNIT 300 REPAIRS, RE:	0.05	8.25
DRG	L340	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO ASHLEY ALLARD,	0.05	8.25
			TOWER II CASE PER ADJUSTER)	0.05	8.25
			0170	AA3346	

	DRG	L340	A104	REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MKA,	Hours	
		L340		ASHLEY ALLARD, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT, MKA,	0.05	8.25
				ASHLEY ALLARD, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
	DRG	L340	A104	REVIEW/ANALYZE EXECUTED AFFIDAVIT OF MKA, ASHLEY ALLARD, RE: (SPLIT WITH TOWER II CASE PER		
	DRG	L340	A103	DRAFT/REVISE CORRESPONDENCE TO ASHLEY ALLARD AND MICHELLE ROBBINS OF MKA, RE:	0.05	8.25
	DRG	L340	A104	(SPLIT WITH TOWER II CASE) REVIEW/ANALYZE CORRESPONDENCE FROM EXPERT,	0.05	8.25
				MICHELLE ROBBINS, RE: (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.05	8.25
01/23/2019	CSW	L250	A104	REVIEW/ANALYZE (CONTINUE) BUILDER'S COMPLAINT AGAINST ASSOCIATION, IN ORDER TO VERIFY AND		
				REFERENCE ASSERTIONS MADE AGAINST ASSOCIATION RELATED TO VIOLATIONS OF STATUTORY REPOSE PERIOD AND NRCP SECTIONS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF		
	CSW	L250	A103	REPOSE (MOTION APPROVED BY ADJUSTER ON 1-2-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMO TO FILE OF	0.20	33.00
				(MOTION APPROVED BY ADJUSTER ON 1-2-19) (SPLIT WITH		
	CSW	L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) PLAINTIFF'S OPPOSITION TO	0.45	74.25
				DEFENDANT LAND WEST BUILDER'S MOTION FOR SUMMARY JUDGMENT PURSUANT TO NRS 11.202(1) FROM BYRNE V. SUNRIDGE HEIGHTS CASE, IN ORDER TO CRAFT LEGAL ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY		
	CSW	L250	۸104	ADJUSTER ON 1-2-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE LOYAL ORDER OF MOOSE LODGE 1785 V.	0.20	33.00
	CSVV	L230	A104	CAVANESS CASE, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-2-19) (SPLIT WITH		
	CSW	L250	A104	DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING	0.10	16.50
	CSW	L250	A103	STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-2-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMO TO FILE OF	0.10	16.50
				(MOTION APPROVED BY ADJUSTER ON 1-2-19)		

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	CSW L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (BEGIN) MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY	Hours 0.40	66.00
			ADJUSTER ON 1-2-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.30	49.50
01/24/2019	JBV L320	A104	REVIEW/ANALYZE FROM CLIENT'S EXPERT, MICHELLE ROBBINS OF MADSEN, KNEPPERS & ASSOCIATES,		
	CSW L250	A103	RE: DRAFT/REVISE (CONTINUE) MEMO TO FILE	0.05	4.75
	OOVV L200	7100	(MOTION APPROVED BY ADJUSTER ON 1-24-19)		
	CSW L250	A103	(SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMO TO FILE	0.60	99.00
			(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.30	49.50
	CSW L250	A103	DRAFT/REVISE (CONTINUE) MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.00	
	CSW L250	A104	CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) COMPLAINT BY BUILDERS AGAINST ASSOCIATION, IN PREPARATION FOR LEGAL	0.80	132.00
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER		
	CSW L250	A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) CHAPTER 40 NOTICE BY THE ASSOCIATION, IN PREPARATION FOR LEGAL ARGUMENTS	0.15	24.75
			FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50
	CSW L250	A104	REVIEW/ANALYZE (BEGIN) CHAPTER 40 NOTICE EXHIBIT REPORT BY GREGORY FEHR AND CORRESPONDING REFERENCED DOCUMENTS, IN PREPARATION FOR LEGAL	00	. 0.00
			ARGUMENTS FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER		
	CSW L250	A104	ADJUSTER) REVIEW/ANALYZE (CONTINUE) NEVADA COURT ODYSSEY WEBSITE, RE: PROCEDURAL HISTORY OF CLAIMS AND	0.20	33.00
			COUNTERCLAIMS BETWEEN THE PARTIES, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON		
	CSW L250	A104	1-24-19) REVIEW/ANALYZE (BEGIN) ASSOCIATION'S COUNTERCLAIM MOTION TO ITS MARCH 2017 ANSWER, RE: ALLEGATIONS	0.10	16.50
			AGAINST BUILDERS, IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19)	0.15	24.75
	CSW L250	A103	DRAFT/REVISE (CONTINUE) MEMO TO FILE OF	AA3348	
			0.4 20	A A 1 14A	

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				Hours	
	CSW L250	A104	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE JUDGE SCOTTIE ORDER IN BYRNE V SUNRIDGE BUILDERS CASE, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19)	0.20	33.00
	CSW L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE JUDGE JOHNSON ORDER, INCLUDED IN REPLY BRIEF FROM BYRNE V SUNRIDGE MATTER, TO EVALUATE IMPACT OF AB 125 REPOSE PERIOD ON TOLLING OF CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH	0.30	49.50
	CSW L250	A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE ASSOCIATION'S OPPOSITION TO MOTION FOR DECLARATORY RELIEF, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19)	0.30	49.50
	CSW L250	A104	(SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) REPLY BRIEF BY SUNRIDGE BUILDERS IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT, RE: LEGAL ARGUMENTS FOR PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.10	16.50 33.00
01/25/2019	DRG L250	A101	PLAN AND PREPARE (BEGIN) STRATEGY FOR MOTION FOR SUMMARY JUDGMENT ON STATUTE OF REPOSE ISSUE, RE: (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER		
	DRG L250	A101	ADJUSTER) PLAN AND PREPARE (CONTINUE) STRATEGY FOR MOTION FOR SUMMARY JUDGMENT ON STATUTE OF REPOSE ISSUE, RE:	0.90	148.50
	CSW L250	A103	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) DRAFT/REVISE (CONTINUE) MEMO TO FILE	0.05 A A 2240	8.25

				Hours	
	CSW L25	0 A104	(MOTION APPROVED BY ADJUSTER SHERILYN BRYDON ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) JUDGE JOHNSON ORDER, INCLUDED IN REPLY BRIEF FROM BYRNE V SUNRIDGE MATTER, TO EVALUATE IMPACT OF AB 125 REPOSE PERIOD ON TOLLING OF CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER SHERILYN BRYDON ON 1-24-19) (SPLIT WITH TOWER II CASE PER	0.30	49.50
	CSW L25	0 A103	ADJUSTER) DRAFT/REVISE (CONTINUE) MEMO TO FILE OF LEGAL	0.15	24.75
	CSW L25	0 A104	(MOTION APPROVED BY ADJUSTER SHERILYN BRYDON ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (CONTINUE) JUDGE SCOTTY ORDER, INCLUDED IN REPLY BRIEF FROM BYRNE V SUNRIDGE	0.35	57.75
			MATTER, TO EVALUATE IMPACT OF AB 125 REPOSE PERIOD ON TOLLING OF CLAIMS, IN PREPARATION FOR DRAFTING MOTION FOR SUMMARY JUDGMENT REGARDING STATUTE OF REPOSE (MOTION APPROVED BY ADJUSTER SHERILYN BRYDON ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER)	0.15	24.75
01/26/2019	DRG L25	0 A101	PLAN AND PREPARE (CONTINUE) STRATEGY FOR MOTION FOR SUMMARY JUDGMENT ON STATUTE OF REPOSE ISSUE, RE:		
	DRG L25	0 A104	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) OPPOSITION TO OUR MOTION FOR	0.85	140.25
			RECONSIDERATION AND ATTACHED EXHIBITS, IN PREPARATION FOR DRAFTING REPLY IN SUPPORT OF SAME (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH		
	DRG L25	0 A104	TOWER II CASE PER ADJUSTER) REVIEW/ANALYZE (BEGIN) EDCR PROVISIONS 2.24 AND 1.14, RE: ARGUMENTS ON SAME PRESENTED IN OPPOSITION TO OUR MOTION FOR RECONSIDERATION, TO FORMULATE ARGUMENTS IN RESPONSE, IN PREPARATION FOR DRAFTING A REPLY IN SUPPORT OF MOTION FOR RECONSIDERATION (MOTION APPROVED BY AD JUSTER ON 1.24.10) (SPLIT WITH	0.80	132.00
	DRG L25	0 A108	(MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER ADJUSTER) COMMUNICATE (OTHER EXTERNAL) TELEPHONE CALL WITH EXPERT, SIMON LOADSMAN, RE: MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II CASE PER	0.20	33.00
	DRG L25	0 A103	ADJUSTER) DRAFT/REVISE CORRESPONDENCE TO EXPERT, SIMON LOADSMAN, RE: (MOTION APPROVED BY ADJUSTER ON 1-24-19) (SPLIT WITH TOWER II	0.10	16.50
			ALTROVED BY ADDOCIER ON 1-24-18) (OF EIT WITH TOWER II	Δ Δ 3 3 5 0	