

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

IN THE MATTER OF THE  
ADMINISTRATION OF THE SSJ'S ISSUE  
TRUST

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**CASE NO.: 81470**

IN THE MATTER OF THE  
ADMINISTRATION OF THE SAMUEL S.  
JAKSICK, JR., FAMILY TRUST

**District Court Case No.:  
PR17-00445/PR17-00446**

TODD B. JAKSICK, Individually, as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
Trust, and as Trustee of the SSJ's Issue Trust;  
MICHAEL S. KIMMEL, Individually and as  
Co-Trustee of the Samuel S. Jaksick Jr. Family  
Trust; KEVIN RILEY, Individually, as Former  
Trustee of the Samuel S. Jaksick Jr. Family  
Trust, and as Trustee of the Wendy A. Jaksick  
2012 BHC Family Trust; and STANLEY  
JAKSICK, Individually and as Co-Trustee of  
the Samuel S. Jaksick Jr. Family Trust,

Appellants/Cross-Respondents,

vs.

WENDY JAKSICK,

Respondent/Cross-Appellant.

**APPELLANT/CROSS-RESPONDENT**  
**TODD B. JAKSICK'S APPENDIX TO OPENING BRIEF**

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Request for Submission	5.18.20	19	TJA003358-003365
Request for Submission	5.19.20	19	TJA003373-003376
Request for Submission	5.19.20	20	TJA003453-003456
Request for Submission	6.8.20	21	TJA003635-003638
Request for Submission of Motion for Order Awarding Costs and Attorneys' Fees	4.1.19	7	TJA001186-001189
Request for Submission of Wendy A. Jaksick's Motion for Leave to Join Indispensable Parties	12.18.18	5	TJA000934-000936

Respondent Wendy A. Jaksick's Answer to Petition for Approval of Accounting and Other Trust Administration Matters (Family Trust)	10.10.17	4	TJA000595-000601
Respondent Wendy A. Jaksick's Answer to Petition for Approval of Accounting and Other Trust Administration Matters (Issue Trust)	10.10.17	4	TJA000602-000606
Respondent Wendy A. Jaksick's Opposition and Objection to Petition for Confirmation of Trustees and Admission of Trust to the Jurisdiction of the Court, and for Approval of Accountings and Other Trust Administration Matters (Family Trust)	10.10.17	4	TJA000586-000594
Respondent Wendy A. Jaksick's Opposition and Objection to Petition for Confirmation of Trustees and Admission of Trust to the Jurisdiction of the Court, and for Approval of Accountings and Other Trust Administration Matters (Issue Trust)	10.10.17	4	TJA000607-000614

Stanley Jaksick's Written Closing Arguments	7.1.19	7	TJA001275-001281
Stanley Jaksick's Written Closing Reply Brief	7.31.19	11	TJA001758-001977
Stanley S. Jaksick's Answer to First Amended Counter-petition to Surcharge Trustees for Breach of Fiduciary Duties, For Removal of Trustees and Appointment of Independent Trustee(s), and for Declaratory Judgment and Other Relief	8.2.18	5	TJA000832-000844
Supplemental Brief by Stanley Jaksick, Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust	2.18.20	12	TJA002078-002085
Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	5.12.20	19	TJA003206-003324
Todd B. Jaksick's and Michael S. Kimmel's Answer to First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary Duties, For Removal of Trustees and Appointment of Independent Trustees, and for Declaratory Judgment and Other	4.13.18	4	TJA000780-000795

Relief			
Todd B. Jaksick's Answer and Objections to First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary Duties, For Removal of Trustees and Appointment of Independent Trustee(s) and For Declaratory Judgment and Other Relief	4.9.18	4	TJA000767-000779
Todd B. Jaksick's Closing Argument Brief	7.1.19	7	TJA001282-001362
Todd B. Jaksick's Closing Argument Brief	7.31.19	9	TJA001536-001623
Todd B. Jaksick's Opposition to Wendy Jaksick's Motion to Alter or Amend Judgment, or, Alternatively, Motion for a New Trial	5.8.20	18	TJA003152-003189
Todd B. Jaksick's Opposition to Wendy Jaksick's Supplemental Motion in Support of Award of Attorney's Fees	5.21.20	21	TJA003609-003617
Todd B. Jaksick's, Individually, Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000856-000872

Todd Jaksick's Motion to Strike Wendy Jaksick's Verified Memorandum of Costs or, in the Alternative, Motion to Retax Costs	3.25.20	13	TJA002190-002194
Todd B. Jaksick's Motion to Amend Judgment	4.29.20	18	TJA003001-003043
Todd Jaksick's Supplemental Brief in Response to the Court's February 6, 2020 Order for Supplemental Briefing	2.18.20	12	TJA001980-002043
Trial Transcript	5.13.19	7	TJA001190-001202
Trustees' Supplemental Brief	2.18.20	12	TJA002044-002077
Verdicts	3.4.19	5	TJA000954-000957
Verified Memorandum of Costs	3.23.20	13	TJA002165-002189
Wendy Jaksick's Brief of Closing Arguments in the Equitable Claims Trial	7.31.19	10	TJA001662-001757
Wendy Jaksick's Brief of Opening Arguments in the Equitable Claims Trial	7.1.19	8	TJA001363-001470
Wendy Jaksick's Motion for Leave to Join Indispensable Parties	11.15.18	5	TJA000848-000855
Wendy Jaksick's Omnibus Reply in Support of Motion for Leave to	12.17.18	5	TJA000899-000933

Join Indispensable Parties			
Wendy Jaksick's Reply in Support of her Motion to Alter or Amend Judgment, or, Alternatively, Motion for New Trial	5.15.20	19	TJA003349-003357
Wendy Jaksick's Response to Todd Jaksick's Motion to Strike Wendy Jaksick's Verified Memorandum of Costs, or in the Alternative, Motion to Retax Costs	4.8.20	14	TJA002446-002450
Wendy Jaksick's Supplemental Brief in the Equitable Claims Trial	2.25.20	12	TJA002086-002093

Dated this 13<sup>th</sup> day of April, 2021.

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**CERTIFICATE OF SERVICE**

I certify that on the 13th day of April, 2021, I served a copy of **APPELLANT/CROSS-RESPONDENT TODD B. JAKSICK'S APPENDIX TO OPENING BRIEF- VOL. 6**, upon all counsel of record:

☐ BY MAIL: I placed a true copy thereof enclosed in a sealed envelope addressed as follows:

☐ BY FACSIMILE: I transmitted a copy of the foregoing document this date via telecopier to the facsimile number shown below:

X BY ELECTRONIC SERVICE: by electronically filing and serving the foregoing document with the Nevada Supreme Court's electronic filing system:

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DATED this 13th day of April, 2021.

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**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

In the Matter of the:

SSJ's ISSUE TRUST.

**CASE NO.: PR17-00445**

**DEPT. NO.: 15**

In the Matter of the:

SAMUEL S. JAKSICK, JR., FAMILY TRUST.

**CASE NO.: PR17-00446**

**DEPT. NO.: 15**

WENDY JAKSICK,  
Respondent and Counter-Petitioner,  
v.  
TODD B. JAKSICK, Individually, as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
Trust, and as Trustee of the SSJ's Issue Trust;  
MICHAEL S. KIMMEL, Individually and as  
Co-Trustee of the Samuel S. Jaksick Jr. Family  
Trust; STANLEY S. JAKSICK, Individually  
and as Co-Trustee of the Samuel S. Jaksick Jr.  
Family Trust; KEVIN RILEY, Individually, as  
Former Trustee of the Samuel S. Jaksick Jr.  
Family Trust, and as Trustee of the Wendy A.  
Jaksick 2012 BHC Family Trust, INCLINE  
TSS, LTD.; and DUCK LAKE RANCH, LLC;

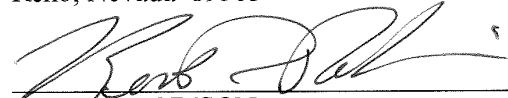
Petitioners and Counter-Respondents.

**MOTION FOR ORDER AWARDING  
COSTS AND ATTORNEYS' FEES FOR  
TODD JAKSICK, INDIVIDUALLY, DUCK  
LAKE RANCH, LLC, AND INCLINE TSS,  
LTD.**

1 Todd Jaksick, individually, Duck Lake Ranch, LLC, ("Duck Lake") and Incline TSS, Ltd.,  
2 ("Incline TSS") move this Honorable Court for its order awarding costs in favor of Todd Jaksick,  
3 individually, Duck Lake and Incline TSS against Counter-Petitioner Wendy Jaksick and further  
4 move this Honorable Court for an order awarding all attorneys' fees incurred by these moving  
5 parties or, in the alternative, attorneys' fees incurred from and after the date of Todd Jaksick's  
6 Offer of Judgment served August 29, 2018. This motion is made pursuant to NRS 18.005, NRS  
7 18.010, NRS 18.020 and Rule 68 of the Nevada Rules of Civil Procedure. This motion is based  
8 upon the papers and pleadings on file herein, the attached points and authorities submitted  
9 herewith and any argument of counsel as the Court may allow.

10 DATED this 13th day of March, 2019.

11 ROBISON, SHARP, SULLIVAN & BRUST  
12 A Professional Corporation  
13 71 Washington Street  
14 Reno, Nevada 89503



15 KENT R. ROBISON  
16 THERESE M. SHANKS

17 *Attorneys for Todd B. Jaksick, Individually,  
18 Incline TSS, Ltd., and Duck Lake Ranch, LLC*

19 **POINTS AND AUTHORITIES**

20 Todd Jaksick, individually ("Todd"), Duck Lake and Incline TSS respectfully submit the  
21 following as and for their points and authorities in support of their Motion for Order Awarding  
22 Costs and Attorneys' Fees.

23 **I. TODD'S LEGAL RIGHTS AND FIDUCIARY DUTIES.**

24 The Court is well aware that Todd is the Trustee of the SSJ's Issue Trust and is Co-Trustee  
25 of the Samuel S. Jaksick, Jr. Family Trust. As such, he has fiduciary duties to continue to account  
26 to the beneficiaries of each Trust. He has ongoing fiduciary duties of disclosure, impartiality and  
27 loyalty. He is aware that he must place the interests of the beneficiaries above his own interests.  
28 So long as he is Trustee and Co-Trustee, he will continue to do so.

By suing Todd, Wendy created an adversary relationship. This motion for costs and

1 attorneys' fees is an effort to allow Todd the benefit of the rights he has under applicable statutes  
2 and rules. He has a duty to other beneficiaries to pursue this motion and recover fees and costs  
3 that have been incurred as a result of Wendy's failed attempt to hold Todd liable individually.

4 **II. COSTS.**

5 Attached hereto as **Exhibit 1** is the jury Verdict filed in this matter on March 4, 2019. The  
6 jury found in favor of Todd as an individual. Either by jury verdict or by unannounced order of the  
7 Court, Duck Lake and Incline TSS prevailed on all claims pursued against them by Counter-  
8 Petitioner Wendy Jaksick ("Wendy").

9 Pursuant to NRS 18.005 and NRS 18.020, Todd, individually, Duck Lake and Incline TSS  
10 ("Counter-Respondents") are entitled to recover all costs incurred in defending Wendy's  
11 accusations, allegations and Counter-Petition.

12 Attached hereto as **Exhibit 2** is the Memorandum of Costs and Disbursements filed in this  
13 matter by these Counter-Respondents in Case No. PR17-00445. Attached hereto as **Exhibit 3** is  
14 the Memorandum of Costs and Disbursements filed with this Court by these Counter-Respondents,  
15 which reflect the costs incurred in defending against Wendy's accusations, allegations and  
16 Counter-Petition in Case No. PR17-00446. Todd Jaksick, individually, Duck Lake and Incline  
17 TSS are entitled to recover their total costs incurred in the amount of \$68,834.07. Costs are to be  
18 awarded to prevailing parties pursuant to NRS 18.020, which reads as follows:

19 Costs **must** be allowed of course to the prevailing party against any  
20 adverse party against whom judgment is rendered in the following cases:

21 . . .

22 (3) In an action for recovery of money or damages, where the plaintiff  
23 seeks to recover more than \$2,500.

24 NRS 18.020 (emphasis added).

25 The Nevada Supreme Court has enforced the plain language of this statute. *Schwartz v.*  
26 *Estate of Greenspan*, 110 Nev. 1042, 1050, 818 P.2d 638, 643 (1994) ("An award of costs to the  
27 prevailing party is mandated where, as here, damages were sought in an amount in excess of  
28 \$2,500."); *Campbell v. Campbell*, 101 Nev. 380, 383, 705 P.2d 154, 156 (1985) ("Costs are  
awarded as a matter of course to the prevailing party in actions listed in NRS 18.020.").

1 In this case, Wendy sought to recover \$80,000,000 in damages, plus exemplary damages.  
2 The jury found in favor of Todd. Duck Lake and Incline TSS are also prevailing parties.

3 Todd, Duck Lake and Incline TSS have identified and documented their recoverable costs  
4 incurred as set forth in the attached Memoranda of Costs and Disbursements (Exhs. 2 and 3). A  
5 Memorandum of Costs and Disbursements has been filed in each of these two consolidated cases  
6 in which Wendy filed her Counter-Petition against these Counter-Respondents. All of these costs  
7 are recoverable, since these Counter-Respondents are, as a matter of law, prevailing parties against  
8 Wendy. Therefore, Todd, Duck Lake and Incline TSS request that this Honorable Court award  
9 them their costs as set forth in the attached Memoranda of Costs and Disbursements.

10 In addition to the provisions of NRS 18.005 and NRS 18.020, Todd is entitled to recover  
11 his costs pursuant to NRCP 68. Todd, individually, and as Trustee of the SSJ's Issue Trust, served  
12 Wendy with Offers of Judgment on August 29, 2018. The Offers of Judgment are attached hereto  
13 as **Exhibits 4 and 5**. All costs incurred by Todd, individually, and as Trustee of the SSJ's Issue  
14 Trust, should be awarded under Rule 68. Maupin, Cox & LeGoy represent Todd as Trustee of the  
15 SSJ's Issue Trust. Hence, to the extent these Points and Authorities refer to Todd as Trustee of the  
16 SSJ's Issue Trust, it is intended that the actual fees and costs to which Todd is entitled and should  
17 be awarded are governed by the Memorandum of Costs and Motion for Costs and Attorneys' Fees  
18 filed herein by Maupin, Cox & LeGoy.

19 Todd prevailed in all respects on all claims pursued by Wendy. He prevailed in his  
20 capacity as an individual. As Trustee of the SSJ's Issue Trust, Todd prevailed against Wendy  
21 because his Offer of Judgment was for \$25,000 and the jury's Verdict against Todd, as Trustee of  
22 the SSJ's Issue Trust, was for an amount of \$15,000.

23 While all costs should be awarded under Rule 68 that were incurred by Todd, individually,  
24 and as Trustee of the SSJ's Issue Trust, after the Offers of Judgment were served on August 29,  
25 2018, nonetheless all costs incurred since the filing date of Wendy's Counter-Petition must be  
26 awarded, since these Counter-Respondents are prevailing parties against Wendy and must receive  
27 all costs incurred pursuant to NRS 18.005 and NRS 18.020. The NRCP Rule 68 Offers of  
28 Judgment confirm that Todd, as the Trustee of the SSJ's Issue Trust, is entitled to the costs he has

1 incurred since August 29, 2018. Todd, Duck Lake and Incline TSS will move to amend the  
2 Judgment on Jury Verdict to include the award of costs against Wendy in the amount of  
3 \$68,834.07, or such amount as the Court allows.

4 **III. TODD, DUCK LAKE AND INCLINE TSS ARE ENTITLED TO RECOVER ALL**  
5 **ATTORNEYS' FEES INCURRED PURSUANT TO NRS 18.010(2)(b).**

6 NRS 18.010(2)(b) allows a prevailing party to recover all attorneys' fees incurred when the  
7 Court finds that the plaintiff's [Wendy's] claims were brought **or maintained** without reasonable  
8 ground or to **harass** the prevailing parties. Furthermore, NRS 18.010(2)(b) requires this  
9 Honorable Court to "liberally construe the provisions of this paragraph **in favor of awarding**  
10 **attorney's fees in all appropriate situations.**

11 The purpose of NRS 18.010(2)(b) is to punish those parties under appropriate situations for  
12 pursuing vexatious claims, which overburden and unnecessarily tax our limited judicial resources.  
13 An award of all attorney's fees is also warranted where the party against whom judgment is  
14 rendered attempts to "hinder the timely resolution" of meritorious claims, which results in  
15 increased costs of engaging in business and providing professional services to the public.

16 Wendy did not pursue or maintain her claims in good faith. The evidence is beyond  
17 dispute that Wendy's claims were without reasonable grounds and were intended to harass Todd,  
18 Duck Lake and Incline TSS. The lack of reasonable grounds for Wendy's claims and the evidence  
19 brought forth showing an intent to harass Todd, Duck Lake and Incline TSS are supported by the  
20 following observations.

- 21 1. Wendy's Counter-Petition filed in this matter on January 19, 2018, was not  
22 properly verified by Wendy. In a clear breach of Nevada statutory mandates, Wendy's  
23 out-of-state counsel verified the Counter-Petition, even though at the time he was not  
24 admitted *pro hac vice*.
- 25 2. Wendy's Counter-Petition named Todd as an individual and accused Todd as an  
26 individual for the same allegedly improper conduct as alleged against Todd as Trustee  
27 and Co-Trustee. Wendy never presented a showing of how Todd could or would be  
28 individually liable and the conclusion that naming Todd as an individual was intended

- 1 to harass Todd without good cause is inescapable.
- 2 3. Wendy filed pejorative and acrimonious accusations without factual basis.
- 3 Throughout the lawsuit, Wendy's counsel continuously claimed that they had
- 4 insufficient documentary production. The accusations in Wendy's Counter-Petition
- 5 were, therefore, not well grounded in fact or law.
- 6 4. Wendy, through emails and other communications, made accusations against Todd
- 7 of forgery and theft. The accusations were intended to harass. Wendy never presented
- 8 any evidence, expert or otherwise, that a single document was forged. Indeed, Exhibit
- 9 220 (the report of James Green) completely dispels and contradicts Wendy's
- 10 accusations that her signature and the signature of Samuel Jaksick were forged. The
- 11 forgery accusations were made without a reasonable basis, were made in bad faith and
- 12 were intended to harass.
- 13 5. Wendy displayed an exceptional willingness to be financially irresponsible. Having
- 14 been advanced over \$600,000 after Sam's death, she continuously accused Todd of
- 15 trying to deprive her of any financial aid.
- 16 6. Wendy provided a vague, ambiguous and unintelligible NRCP 16.1 computation of
- 17 damages. Throughout discovery she refused to provide any specificity regarding her
- 18 damages. Wendy never provided a computation of damages or any reasonable
- 19 calculation concerning the damages she argued (for the first time) were incurred as a
- 20 result of water rights being held by various Jaksick entities.
- 21 7. Wendy's purported \$80,000,000 damage claim was an unsupported attempt to
- 22 persuade the jury to award a sizeable amount of damages despite the complete lack of
- 23 proof.
- 24 8. Wendy claimed throughout discovery and trial that she was not provided a copy of
- 25 the Second Amendment to Sam's Trust until she hired Las Vegas counsel in late 2016.
- 26 The testimony was inappropriate and incorrect. In emails that were admitted in
- 27 evidence, it is clear that Wendy was given a binder containing all Trust documents in
- 28 June of 2013.

- 1           9.       Wendy unreasonably and maliciously denied signing many of the ACPAs despite
- 2                 overwhelming evidence that she did sign each and every ACPA (Exhibits 14 through
- 3                 23).
- 4           10.      To gain leverage and harass Todd, Wendy, in her deposition and in emails to others,
- 5                 maliciously accused Todd of killing Sam Jaksick.
- 6           11.      Wendy also made similar horrendous accusations that Sam's wife, Janene, killed
- 7                 Sam.
- 8           12.      Wendy failed and refused to provide any theory, evidence or support for her
- 9                 verified accusations that Mike Kimmel and Kevin Riley were **individually** liable to
- 10                Wendy.
- 11           13.      In an apparent effort to gain a tactical or strategical advantage, Wendy filed a 102
- 12                page Amended Counter-Petition in this matter on November 15, 2018. Wendy did so
- 13                without leave of Court. Wendy did so with an improper motive to unduly influence the
- 14                Court prior to a hearing on Wendy's Motion to Continue. For good reason, the Court
- 15                struck the 102 page Amended Counter-Petition.
- 16           14.      Wendy made an effort to continue the trial by filing a Motion to Join Indispensable
- 17                Parties. She sought to include as additional parties 48 different companies affiliated
- 18                with the Jaksick family.
- 19           15.      Wendy was ordered not to present evidence concerning discovery disputes before
- 20                the jury. Yet, Wendy persisted in asking questions of witnesses concerning discovery
- 21                disputes and even included discovery disputes in her closing remarks to the jury.
- 22           16.      Wendy never offered a single jury instruction suggesting why Todd should be held
- 23                liable as an individual. Wendy offered no jury instructions which addressed the
- 24                activities or existence of Duck Lake and Incline TSS.
- 25           17.      After having sued Sammy Supercub LLC, Series A, Wendy did not even mention
- 26                this entity to the jury, presented no instructions concerning this entity and, as a result,
- 27                willingly dismissed her claims against this entity.
- 28           18.      Wendy maliciously accused her brother Stan of molesting his children.

- 1           19. Wendy failed and refused to present a proposed jury verdict against Duck Lake or  
2           Incline TSS, thereby conceding her claims against these entities were frivolous.
- 3           20. Although ordered to participate in mediation, Wendy failed to do so in good faith.  
4           Her settlement demands were absurd in light of the value of the estate.
- 5           21. No better evidence of harassment and abuse exists in this case than as reflected in  
6           **Exhibits 6 and 7** attached hereto. Wendy entered into an immoral contract with  
7           Stanley Jaksick. In exchange for Stan paying Wendy \$6,250 per month, Wendy  
8           contractually promised not to sue Stan's companies and agreed to direct her accusations  
9           against only Todd. This agreement was reached between Wendy and Stan privately and  
10          without the knowledge of their respective attorneys.
- 11          22. Wendy designated three experts. Todd incurred substantial costs for flying the  
12          experts to Reno for their depositions. Gary Stolbach was withdrawn as an expert  
13          because his testimony was ultimately harmful to Wendy's case. Frank Campagna  
14          actually testified in favor of the Co-Trustees, admitting that Kevin Riley's compiled  
15          financial reports complied with Nevada law. Wendy chose not to call Campagna for  
16          obvious reasons.

17          Based on the foregoing, and in light of the evidence presented in the trial of this matter, it  
18          is clear beyond question that NRS 18.010(2)(b) applies. This is particularly true in light of the  
19          legislative mandate requiring Courts to liberally construe NRS 18.010(2)(b) **in favor of awarding**  
20          **attorney's fees in all appropriate situations.**

21          Attached as **Exhibit 8** is a schedule of fees incurred by Todd as an individual in Case No.  
22          PR17-00445. As a prevailing party in PR17-00445, Todd should be awarded his attorneys' fees in  
23          the amount of \$377,093.50. Likewise, Todd, as a prevailing party in PR17-00446, should be  
24          entitled to recover all of his attorneys' fees in the amount of \$328,597 (**Exhibit 9**). An Amended  
25          Judgment on Jury Verdict should be entered in this case awarding Todd all of the attorneys' fees  
26          he has incurred as an individual in the total amount of \$705,690.50.

27          **IV. TODD'S OFFERS OF JUDGMENT.**

28          On August 29, 2018, Todd served Wendy with two Offers of Judgment. Todd utilized



1 NRCP 68 to resolve Wendy's accusations against him **individually** by offering \$25,000. This  
2 Offer of Judgment is attached hereto as Exh. 4. This Offer of Judgment was made by Todd as an  
3 individual. Wendy rejected the Offer of Judgment. Accordingly. The provisions of NRCP 68  
4 apply. Also, on August 29, 2018, Todd served Wendy with an Offer of Judgment for himself  
5 individually and as Trustee of the SSJ's Issue Trust. This Offer of Judgment is attached as Exh. 5.  
6 Wendy rejected the Offer of Judgment. Accordingly, the provisions of NRCP Rule 68 apply.

7 By August 29, 2018, substantial discovery had occurred. Wendy had produced  
8 approximately 13,000 pages of documents. Todd had produced over 6,000 pages of documents.  
9 Wendy had been deposed for five days. Stan Jaksick had been deposed for over three days.  
10 Wendy had served 523 Requests for Production of Documents on Todd as an individual, on Todd  
11 as a Co-Trustee and on Todd as the Trustee of the SSJ's Issue Trust. Todd's testimony confirmed  
12 that Wendy's accusations were meritless.

13 Accordingly, Todd's Offers of Judgment were timely. Both Offers were for \$25,000. The  
14 jury found in Todd's favor in his individual capacity and awarded Wendy \$10,000 less than  
15 Todd's Offer of Judgment made in his capacity as Trustee of the SSJ's Issue Trust. Todd is,  
16 therefore, the prevailing party for purposes of NRCP 68 in his capacity as Trustee of the SSJ's  
17 Issue Trust.

18 Nevada statutes and Rules of Civil Procedure impose penalties upon a party who rejects an  
19 Offer of Judgment and does not obtain a better result at trial. NRCP 68(f) and former NRS  
20 17.115(4). Specifically, NRCP 68(f) provides that post-offer attorneys' fees shall be paid and  
21 reads as follows:

22 If the offeree rejects an offer and fails to obtain a more favorable  
23 judgment, . . . (2) the offeree **shall** pay the offeror's post-offer costs,  
24 applicable interest on the judgment from the time of the offer to the  
time of entry of judgment and reasonable attorney's fees, if any be  
allowed, actually incurred by the offeror from the time of the offer.

25 The Nevada Supreme Court has held that, the purpose of NRCP 68 is to "save time and  
26 money for the Court system, the parties and the tax payers . . . reward a party who makes a  
27 reasonable offer and punish the party who refuses to accept such an offer." *Dillard Department*  
28 *Stores, Inc. v. Beckwith*, 115 Nev. 372, 382 (1999). Here, it is undisputed that Wendy rejected the

1 August 29, 2018 Offers of Judgment, each for \$25,000. In order for Wendy to be a prevailing  
2 party, the jury would have to had awarded her more than \$25,000. The jury refused to do so.

3 Wendy was soundly defeated when the jury found that her damages only amounted to  
4 \$15,000. Accordingly, Todd is the prevailing party as the Trustee of the SSJ's Issue Trust and,  
5 more convincingly, as an individual Counter-Respondent.

6 Todd attempted to resolve a disputed claim in good faith for an amount that was entirely  
7 reasonably, particularly in light of the jury's Verdict. The fees and costs incurred after August 29,  
8 2018 were unnecessary and Wendy's rejections of the Offers of Judgment created substantial  
9 hardship on the Court system, the parties, the witnesses and all involved. It resulted in a multitude  
10 of motions being filed, discovery disputes being aired and a needless dissipation of scarce judicial  
11 resources.

12 *Beatty v. Thomas*, 99 Nev. 579, 588-89 (1983), is applicable. Application of the *Beatty*  
13 factors to the instant case unequivocally supports an award of attorneys' fees in favor of Todd,  
14 individually, and as Trustee of the SSJ's Issue Trust. The *Beatty* factors argue in favor of an award  
15 of attorneys' fees. In exercising its discretion regarding the allowance of fees and costs under  
16 NRCP 68, the trial court is encouraged to evaluate the following factors:

- 17 (1) Whether Wendy's claims were brought in good faith;
- 18 (2) Whether Todd's Offers of Judgment were reasonable and in good faith, both in  
19 their timing and amount;
- 20 (3) Whether Wendy's decision to reject the offer and proceed to trial was unreasonable  
21 or in bad faith; and
- 22 (4) Whether the fees sought are reasonable and justified in amount.

23 **1. Wendy's Claims Were Neither Brought Nor Pursued in Good Faith.**

24 Wendy was represented by counsel as early as January 2014. With the assistance of  
25 counsel, she could have made specific requests of Todd as Trustee and as Co-Trustee. Wendy  
26 based her Counter-Petition primarily on accusations of forgery. Each and every signature she  
27 challenged was confirmed as authentic and legitimate. Her accusations of forgery demonstrate a  
28 lack of good faith. She contrived accusations that were false and baseless.

1 Wendy refused to admit being involved in a multitude of discussions with Todd and Stan,  
2 wherein the business activities of the Family Trust were discussed in detail. Wendy denied having  
3 knowledge sufficient to make her aware of the need for the ACPAs she executed in this case. Her  
4 signatures on the ACPAs were **not** forged. She was fully advised and she knowingly and  
5 voluntarily signed the ACPAs. The ACPAs not only advised Wendy of the nature of the  
6 transaction, she agreed by signing the ACPAs to **release** Todd from any liability regarding the  
7 transaction subject of the individual ACPA. Despite her willingness to release Todd, she then  
8 sued him for \$80,000,000.

9 Wendy's bad faith is further illustrated by her refusal to ever provide a cogent,  
10 understandable and meaningful computation of damages. Indeed, she attempted to catch Todd by  
11 surprise and engaged in trial by ambush when she based her \$80,000,000 damage claim on water  
12 rights of which she claims that she was the beneficiary. The disingenuous position that she would  
13 receive a third of a \$1.2 billion "pie in the sky" deal presented by ECO II is clear evidence of  
14 abusive trial tactics and prosecuting claims in bad faith.

15 Exhs. 6 and 7 attached hereto epitomize bad faith. Wendy extorted \$6,250 per month from  
16 Stan based on her promise that she would not sue Stan's entities primarily involving the Montreux  
17 companies. After the elicited agreement was discovered in June of 2018, Wendy then attempted to  
18 sue Stan's companies in her motion to join 48 indispensable parties, some of which included  
19 Stan's companies and entities. In addition, the items listed in section III hereinabove further  
20 demonstrate that how and why Wendy's claims were neither brought nor pursued in good faith.

21 Also persuasive is the fact that Wendy pursued claims against 12 different Counter-  
22 Respondents without making the slightest efforts to differentiate which Counter-Respondent was  
23 responsible for what improper conduct which **caused** any specific damages by any specific  
24 Counter-Respondent. She pursued her claims by relying on hyperbole, exaggeration and false  
25 testimony. Her tactics were to intimidate, harass and annoy. Her accusations were vexatious and  
26 proven to be false.

27 **2. Todd's Offers of Judgment Were Reasonable and in Good Faith.**

28 The jury's Verdict substantiates the reasonableness of Todd's Offers of Judgment. He

1 overestimated his exposure as the Trustee of the SSJ's Issue Trust by \$10,000. He overestimated  
2 his exposure to Wendy as an individual by \$25,000. Wendy forced Todd to trial.

3 Todd's Offers of Judgment were based on the testimony Wendy gave in June of 2013, on  
4 Stanley Jaksick's testimony and upon his own fundamental understanding of the facts and  
5 circumstances pertaining to his involvement with Wendy.

6 The timing of the Offers of Judgment was appropriate. They gave Wendy fair notice of the  
7 risks she would assume by proceeding with hostile litigation. The Offers were made at a time  
8 when Wendy's reliance on forgery accusations could easily be refuted. At the time of Todd's  
9 Offers, Wendy had never presented any clear picture or evidence that she sustained **any** damages.  
10 Wendy had not shown and after the Offers of Judgment were served could not connect any of  
11 Todd's activities as the **cause** for Wendy's contrived damage theory. Not once, before or after the  
12 Offers of Judgment, did Wendy present any evidence that Todd had liability as an individual. The  
13 evidence was overwhelming that Wendy was not entitled to an interest in the Lake Tahoe house,  
14 the Bronco Billy's sale proceeds were to be with the Family Trust, and Wendy gave written  
15 approval for the ten transactions addressed in the ACPAs. By August 29, 2018, Wendy was  
16 confronted with an insurmountable burden of proving wrongdoing by Todd. Wendy's feverous  
17 attempt to conduct massive discovery proves the obvious. Wendy did not have a case against  
18 Todd.

19 **3. Wendy's Rejection Was Grossly Unreasonable and in Bad Faith.**

20 From the beginning, Wendy had no intention of settling this case. Clearly, any Offer of  
21 Judgment would have been rejected. Wendy's participation in mediation can only be characterized  
22 as absurd. Wendy saw Todd and Stan's generosity as weakness and tried to capitalize on her  
23 willingness to intimidate by pejorative and hateful accusations. Plausibly, Wendy had nothing to  
24 lose by going to trial since her lawyers were working on a contingency basis. This likely  
25 emboldened Wendy to refuse legitimate and good faith settlement efforts.

26 Wendy's "nothing to lose" attitude explains in part why an \$80,000,000 damage request  
27 was made of the jury. Wendy's total lack of evidence concerning damages further illustrates how  
28 her rejection of Offers of Judgment were unreasonable and in bad faith. Also compelling is that

1 Wendy, regardless of her bad faith rejections of the Offers of Judgment and her decisions to  
2 proceed with trial, was the fact that she would inherit her fair share, regardless of her tactics and  
3 abuses of the litigation process. Realizing that she may receive as much as \$4,000,000 as a result  
4 of Sam's estate planning, likely convinced Wendy that settlement was unnecessary and  
5 inappropriate. She was to receive an inheritance, regardless of whether she pursued her litigation  
6 in good faith. The rejection of Todd's Offers of Judgment under these circumstances was grossly  
7 unreasonable and done in bad faith.

8 **4. Whether the Fees are Reasonable and Justified in Amount.**

9 The stakes in this litigation were extremely high. Todd was confronted with Wendy's  
10 desire to obtain up to \$80,000,000 in damages. Todd was deposed for six days. Todd was on the  
11 stand in trial for three and a half days. Wendy endeavored to make every aspect of this litigation  
12 onerous, oppressive and extremely stressful.

13 The fees incurred by Todd from the date his Offers of Judgment were served are as  
14 follows. Exh. 10 is the schedule of fees incurred by Todd individually in Case No. PR17-00445  
15 incurred after he served his Offer of Judgment. Exh. 11 is the schedule of fees incurred by Todd  
16 individually in Case No. PR17-00446 after her served his Offer of Judgment. The fees shown in  
17 Exhs. 10 and 11 are those that pertain to Todd as an individual only. The fees and costs to which  
18 Todd is entitled to receive as Trustee of the SSJ's Issue Trust are shown and presented in the  
19 Memorandum of Costs and Motion for Costs and Attorneys' Fees being filed and pursued by  
20 Maupin, Cox & LeGoy.

21 The reasonableness of the fees incurred depends upon the seriousness of the accusations  
22 made, the skill and experience of the lawyers involved and the outcome of the litigation. The  
23 seriousness of the case can be succinctly summarized by the fact that Wendy asked the jury to  
24 award her \$80,000,000 in damages **plus** punitive damages. A full-out effort and commitment by  
25 Todd's counsel were required. The skill and experience of Todd's counsel is reflected, in part, by  
26 the attached **Exhibit 12** (statement of qualifications of Kent Robison). Exh. 12 shows that Todd's  
27 counsel had participated in over 100 jury trials, practiced for over 44 years and has extensive  
28 experience in complex litigation in a multitude of jurisdictions throughout the United States.

1 Under the circumstances involved in this case and in light of counsel's experience, an hourly rate  
2 of \$450 is reasonable. The services described in Exhs. 8, 9, 10 and 11 were indispensable,  
3 necessary and contributed to the exoneration of Todd Jaksick.

4 **V. CONCLUSION.**

5 Todd should not be punished any further. He has worked with devotion and dedication to  
6 administer two extremely complicated Trusts. He has reduced the Family Trust's debt of over  
7 \$30,000,000 to an amount now less than \$3,000,000. Distributions from the Family Trust are  
8 imminent. The Issue Trust's 54% ownership of the Lake Tahoe house had appreciated more than  
9 \$3,000,000 over the past few years. Todd prevailed. His costs should be reimbursed and Todd is  
10 clearly entitled to attorneys' fees under NRS 18.010, given all of the facts and circumstances  
11 surrounding this hostile and acrimonious litigation. At the very least, Todd is entitled to recover  
12 his attorneys' fees pursuant to and in accordance with the spirit and intent of NRCP 68.

13 Todd's costs, as an individual, should be awarded in the amount of \$68,834.07.

14 Todd should recover attorneys' fees, as an individual, pursuant to NRS 18.010 in the total  
15 amount of \$705,690.50.

16 If the Court does not award fees pursuant to NRS 18.010, the Court should, in the  
17 alternative, award Todd his attorneys' fees, as an individual, pursuant to NRCP 68 in the total  
18 amount of \$436,331.

19 Todd, as Trustee of the SSJ's Issue Trust, should also recover fees and costs as more  
20 specifically presented by the Memorandum of Costs and Motion for Costs and Attorneys' Fees  
21 filed and being pursued by Maupin, Cox & LeGoy.

22 **AFFIRMATION**  
23 **Pursuant to NRS 239B.030**

24 The undersigned does hereby affirm that this document does not contain the social security

25 ///

26 ///

27 ///

28 ///

1 number of any person.

2 DATED this 13<sup>th</sup> day of March, 2019.

3 ROBISON, SHARP, SULLIVAN & BRUST  
4 A Professional Corporation  
5 71 Washington Street  
6 Reno, Nevada 89503

7   
8 KENT R. ROBISON  
9 THERESE M. SHANKS  
10 *Attorneys for Todd B. Jaksick, Individually,*  
11 *Incline TSS, Ltd., and Duck Lake Ranch, LLC*

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**AFFIDAVIT OF KENT R. ROBISON**  
**IN SUPPORT OF MOTION FOR ORDER AWARDING COSTS AND ATTORNEYS'**  
**FEES FOR TODD JAKSICK, INDIVIDUALLY, DUCK LAKE RANCH, LLC, AND**  
**INCLINE TSS, LTD., LLC**

[illegible]

Kent R. Robison, being first duly sworn on oath, deposes and says under penalty of perjury that the following assertions are true and correct.

1. I am counsel in these matters for Respondents Todd Jaksick, Duck Lake Ranch, LLC and Incline TSS, Ltd.

2. Attached as **Exhibit 1** is a true and accurate file-stamped copy of the Verdict entered in these consolidated matters on March 4, 2019.

3. Attached hereto as **Exhibit 2** is a true and accurate file-stamped copy of Todd B. Jaksick, Individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC's Memorandum of Costs and Disbursements Incurred in Case No. PR17-00445.

4. Attached hereto as **Exhibit 3** is a true and accurate file-stamped copy of Todd B. Jaksick, Individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC's Memorandum of Costs and Disbursements Incurred in Case No. PR17-00446.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of Todd B. Jaksick, as an Individual, Offer of Judgment to Wendy Jaksick of August 29, 2018.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of Todd B. Jaksick, as an Individual and Trustee of the SSJ's Issue Trust, Offer of Judgment to Wendy Jaksick of August 29, 2018.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the December 11, 2017 agreement between Stan Jaksick and Wendy Jaksick.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of the fully executed December 11, 2017 agreement between Stan Jaksick and Wendy Jaksick.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of Robison, Sharp, Sullivan & Brust's "Detail Fee Transaction File List" of the attorneys' fees incurred by Todd



1 Jaksick, individually, in Case No. PR17-00445 from August 31, 2016, to and including March 7,  
2 2019.

3 10. Attached hereto as **Exhibit 9** is a true and accurate copy of Robison, Sharp,  
4 Sullivan & Brust's "Detail Fee Transaction File List" of the attorneys' fees incurred by Todd  
5 Jaksick, individually, in Case No. PR17-00446 from December 21, 2017, to and including March  
6 7, 2019.

7 11. Attached hereto as **Exhibit 10** is a true and accurate copy of Robison, Sharp,  
8 Sullivan & Brust's "Detail Fee Transaction File List" of the attorneys' fees incurred by Todd  
9 Jaksick, individually, in Case No. PR17-00445 from August 30, 2018, to and including March 7,  
10 2019.

11 12. Attached hereto as **Exhibit 11** is a true and accurate copy of Robison, Sharp,  
12 Sullivan & Brust's "Detail Fee Transaction File List" of the attorneys' fees incurred by Todd  
13 Jaksick, individually, in Case No. PR17-00446 from August 30, 2018, to and including March 7,  
14 2019.

15 13. Attached hereto as **Exhibit 12** is a true and accurate copy of my statement of  
16 qualifications.

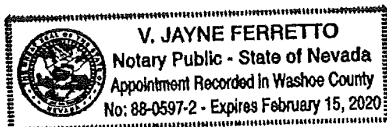
17 DATED this 13<sup>th</sup> day of March, 2019.

18  
19   
20 KENT R. ROBISON

21 STATE OF NEVADA )  
22 ) ss  
23 COUNTY OF WASHOE )

24 Subscribed and Sworn to Before me this  
25 13<sup>th</sup> day of March, 2019, by  
26 Kent R. Robison.


27   
28 NOTARY PUBLIC



1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP,  
3 SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the **MOTION**  
4 **FOR ORDER AWARDING COSTS AND ATTORNEYS' FEES FOR TODD JAKSICK,**  
**INDIVIDUALLY, DUCK LAKE RANCH, LLC, AND INCLINE TSS, LTD., LLC** on all  
parties to this action by the method(s) indicated below:

5 \_\_\_\_\_ by placing an original or true copy thereof in a sealed envelope, with sufficient postage  
6 affixed thereto, in the United States mail at Reno, Nevada, addressed to:

7  by using the Court's CM/ECF electronic service system courtesy copy addressed to:

8 **Donald A. Lattin, Esq.**

9 **L. Robert LeGoy, Jr., Esq.**

10 **Brian C. McQuaid, Esq.**

11 **Carolyn K. Renner, Esq.**

12 Maupin, Cox & LeGoy

13 4785 Caughlin Parkway

14 P. O. Box 30000

15 Reno, Nevada 89519

16 Email: [dlattin@mcllawfirm.com](mailto:dlattin@mcllawfirm.com)

17 [blegoy@mcllawfirm.com](mailto:blegoy@mcllawfirm.com)

18 [bmcquaid@mcllawfirm.com](mailto:bmcquaid@mcllawfirm.com)

19 [crenner@mcllawfirm.com](mailto:crenner@mcllawfirm.com)

20 *Attorneys for Petitioners/Co-Trustees*

21 *Todd B. Jaksick and Michael S. Kimmel of the*

22 *SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust and Kevin Riley*

23 *and Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

24 **Phil Kreitlein, Esq. / Stephen C. Moss, Esq.**

25 Kreitlein Law Group

26 1575 Delucchi Lane, Suite 101

27 Reno, Nevada 89502

28 Email: [philip@kreitleinlaw.com](mailto:philip@kreitleinlaw.com) / [smoss@kreitleinlaw.com](mailto:smoss@kreitleinlaw.com)

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*Attorneys for Stanley S. Jaksick, Individually and as Beneficiary of the*

*Samuel S. Jaksick Jr. Family Trust and SSJ Issue Trust and*

*Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

**Mark J. Connot, Esq.**

Fox Rothschild LLP

1980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

Email: [mconnot@foxrothschild.com](mailto:mconnot@foxrothschild.com)

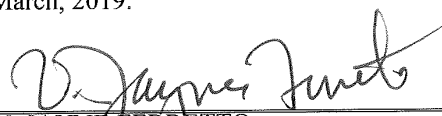
*Attorney for Respondent Wendy A. Jaksick*

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**R. Kevin Spencer, Esq. / Zachary E. Johnson, Esq.**  
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*Attorneys for Respondent Wendy A. Jaksick*

- \_\_\_\_\_ by electronic email addressed to the above and to the following:  
\_\_\_\_\_ by personal delivery/hand delivery addressed to:  
\_\_\_\_\_ by facsimile (fax) addressed to:  
\_\_\_\_\_ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 13<sup>th</sup> day of March, 2019.

  
\_\_\_\_\_  
V. JAYNE FERRETTO  
Employee of Robison, Sharp, Sullivan & Brust

**EXHIBIT LIST**

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
1	Verdict	4
2	Todd B. Jaksick, Individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC's Memorandum of Costs and Disbursements Incurred in Case No. PR17-00445	17
3	Todd B. Jaksick, Individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC's Memorandum of Costs and Disbursements Incurred in Case No. PR17-00446	10
4	Todd B. Jaksick, as an Individual, Offer of Judgment to Wendy Jaksick	5
5	Todd B. Jaksick, as an Individual and Trustee of the SSJ's Issue Trust, Offer of Judgment to Wendy Jaksick	5
6	Agreement between Stanley Jaksick and Wendy Jaksick	2
7	Executed Stanley Jaksick and Wendy Jaksick Agreement	4
8	Schedule of Fees incurred by Todd Jaksick, individually, in Case No. PR17-00445	40
9	Schedule of Fees incurred by Todd Jaksick, individually, in Case No. PR17-00446	37
10	Schedule of Fees incurred by Todd Jaksick, individually, in Case No. PR17-00445 since he served his Offer of Judgment	20
11	Schedule of Fees incurred by Todd Jaksick, individually, in Case No. PR17-00446 since he served his Offer of Judgment	19
12	Statement of Qualifications of Kent R. Robison	5

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

# EXHIBIT 1

# EXHIBIT 1

ORIGINAL

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

WENDY JAKSICK,

Petitioner,

CASE NO.: PR17-00445

v.

DEPT. NO.: 15

TODD B. JAKSICK, Individually, as Co-  
Trustee of the Samuel S. Jaksick Jr.

Family Trust, and as Trustee of the  
SSJ's Issue Trust; MICHAEL S. KIMMEL,

CASE NO.: PR17-00446

Individually and as Co-Trustee of the  
Samuel S. Jaksick Jr. Family Trust;

DEPT. NO.: 15

STANLEY S. JAKSICK, Individually and as  
Co-Trustee of the Samuel S. Jaksick Jr.

Family Trust; KEVIN RILEY,

Individually, as Former Trustee of the  
Samuel S. Jaksick Jr. Family Trust, and

**VERDICT**

as Trustee of the Wendy A. Jaksick 2012  
BHC Family Trust, INCLINE TSS, LTD.;

DUCK LAKE RANCH, LLC; SAMMY SUPERCUB  
LLC, SERIES A,

Respondents.

/ / /

/ / /

/ / /

/ / /

1 We, the jury, duly impaneled in the above-entitled action,  
2 find that Petitioner, Wendy Jaksick, has proven her **breach of**  
3 **fiduciary duty claim**, by a preponderance of evidence, against:

4 (Please circle only one for each line item)

5 KEVIN RILEY (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
6 STAN JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
7 TODD JAKSICK (as Co-Trustee of Family Trust)	<input checked="" type="radio"/> YES	NO
8 MICHAEL KIMMEL (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
9 KEVIN RILEY (as Trustee of BHC Trust)	YES	<input checked="" type="radio"/> NO
10 TODD JAKSICK (as Trustee of Issue Trust)	<input checked="" type="radio"/> YES	NO

11 We, the jury, duly impaneled in the above-entitled action,  
12 find that Petitioner, Wendy Jaksick, has proven her **civil**  
13 **conspiracy and aiding and abetting claim**, by preponderance of  
14 evidence, against:

15 (Please circle only one for each line item)

16 KEVIN RILEY (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
17 KEVIN RILEY (individually)	YES	<input checked="" type="radio"/> NO
18 KEVIN RILEY (as Trustee of BHC Trust)	YES	<input checked="" type="radio"/> NO
19 STAN JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
20 TODD JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
21 TODD JAKSICK (individually)	YES	<input checked="" type="radio"/> NO
22 TODD JAKSICK (as Trustee of Issue Trust)	YES	<input checked="" type="radio"/> NO
23 MICHAEL KIMMEL (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
24 MICHAEL KIMMEL (individually)	YES	<input checked="" type="radio"/> NO

25 / / /

26 / / /

1 We, the jury, duly impaneled in the above-entitled action,  
2 find that Petitioner, Wendy Jaksick, has proven her **aiding and**  
3 **abetting breach of fiduciary duty claim**, by a preponderance of  
4 evidence, against:

5 (Please circle only one for each line item)

6 KEVIN RILEY (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
7 KEVIN RILEY (individually)	YES	<input checked="" type="radio"/> NO
8 KEVIN RILEY (as Trustee of BHC Trust)	YES	<input checked="" type="radio"/> NO
9 STAN JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
10 TODD JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
11 TODD JAKSICK (individually)	YES	<input checked="" type="radio"/> NO
12 TODD JAKSICK (as Trustee of Issue Trust)	YES	<input checked="" type="radio"/> NO
13 MICHAEL KIMMEL (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
14 MICHAEL KIMMEL (individually)	YES	<input checked="" type="radio"/> NO

15 We, the jury, duly impaneled in the above-entitled action,  
16 find that Petitioner, Wendy Jaksick, has proven her **fraud claim**  
17 by clear and convincing evidence, against:

18 (Please circle only one for each line item)

19 TODD JAKSICK (as Co-Trustee of Family Trust)	YES	<input checked="" type="radio"/> NO
20 TODD JAKSICK (individually)	YES	<input checked="" type="radio"/> NO
21 TODD JAKSICK (as Trustee of Issue Trust)	YES	<input checked="" type="radio"/> NO

22  
23 (If you circled "yes" to ANY of the above claim(s) correlating  
24 to ANY respondent then proceed to and answer Questions 1 AND 2.  
25 If you answered "no" to ALL of the above then skip Questions 1  
26 AND 2 and sign and date verdict form.)

27 / / /

28 / / /

/ / /



2. Has Wendy Jaksick established by clear and convincing evidence that any of the Respondents acted with fraud, oppression, or malice?

KEVIN RILEY	YES	(NO)
STAN JAKSICK	YES	(NO)
TODD JAKSICK	YES	(NO)
MICHAEL KIMMEL	YES	(NO)

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FOREPERSON

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2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 2**

**EXHIBIT 2**

1953  
KENT ROBISON, ESQ. – NSB #1167  
krobison@rssblaw.com  
THERESE M. SHANKS, ESQ. – NSB #12890  
tshanks@rssblaw.com  
Robison, Sharp, Sullivan & Brust  
A Professional Corporation  
71 Washington Street  
Reno, Nevada 89503  
Telephone: 775-329-3151  
Facsimile: 775-329-7169  
*Attorneys for Todd B. Jaksick, Individually,  
Incline TSS, Ltd., and Duck Lake Ranch, LLC*

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

In the Matter of the:

SSJ's ISSUE TRUST.

CASE NO.: PR17-00445

DEPT. NO.: 15

In the Matter of the:

SAMUEL S. JAKSICK, JR., FAMILY TRUST.

CASE NO.: PR17-00446

DEPT. NO.: 15

WENDY JAKSICK,  
Respondent and Counter-Petitioner,  
v.  
TODD B. JAKSICK, Individually, as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
Trust, and as Trustee of the SSJ's Issue Trust;  
MICHAEL S. KIMMEL, Individually and as  
Co-Trustee of the Samuel S. Jaksick Jr. Family  
Trust; STANLEY S. JAKSICK, Individually  
and as Co-Trustee of the Samuel S. Jaksick Jr.  
Family Trust; KEVIN RILEY, Individually, as  
Former Trustee of the Samuel S. Jaksick Jr.  
Family Trust, and as Trustee of the Wendy A.  
Jaksick 2012 BHC Family Trust, INCLINE  
TSS, LTD.; DUCK LAKE RANCH, LLC;

TODD B. JAKSICK, INDIVIDUALLY,  
INCLINE TSS, LTD., AND DUCK LAKE  
RANCH, LLC'S MEMORANDUM OF  
COSTS AND DISBURSEMENTS  
INCURRED IN CASE NO. PR17-00445

Petitioners and Counter-Respondents.

**TODD B. JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE RANCH,  
LLC'S MEMORANDUM OF COSTS AND DISBURSEMENTS  
INCURRED IN CASE NO. PR17-00445**

The following constitutes an itemization of costs and disbursements incurred by Respondents Todd B. Jaksick, individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC in Case No. PR17-00445. Attached hereto as support is **Exhibit 1**, which is a Detail Cost Transaction File List that records each cost and disbursement charged to the Respondents Todd B. Jaksick, individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC in Case No. PR17-00445, and paid by the law firm of Robison, Sharp, Sullivan & Brust.

**CLERKS' FEES: (NRS 18.005(1))**

02/04/19	Chase Ink Card - Second Judicial District Court Eflex System Filing Fee (Motion for Summary Judgment Against Stan Jaksick):	200.00
02/04/19	Chase Ink Card - Second Judicial District Court Eflex System Filing Fee (Motion for Summary Judgment Against Wendy Jaksick):	<u>200.00</u>
	<b>Total Clerks' Fees:</b>	<b>\$ 400.00</b>

**COURT REPORTERS' FEES: (NRS 18.005(2))**

06/08/18	A Corrao Video Services, LLC (Video Depositions Wendy Jaksick):	2,588.79
07/09/18	Captions Unlimited, Inc. (Deposition of Wendy Jaksick):	4,323.00
08/06/18	Captions Unlimited, Inc. (Deposition of Wendy Jaksick, Vol.1):	1,030.20
08/23/18	A Corrao Video Services, LLC (Video Deposition Wendy Jaksick):	1,535.86
08/23/18	A Corrao Video Services, LLC (Video Deposition of Stanley Jaksick):	3,093.93
08/23/18	A Corrao Video Services, LLC (Video Deposition of Todd Jaksick):	125.15
08/27/18	Captions Unlimited, Inc. (Deposition of Stanley Jaksick-Vols.1-3):	4,624.50
08/27/18	Bonanza Reporting & Video Conference Center (Deposition Todd Jaksick, Vol. I):	547.10
09/06/18	Bonanza Reporting & Video Conference Center (Deposition of Todd Jaksick, Vol. II):	508.35
09/06/18	Captions Unlimited, Inc. (Deposition of Wendy Jaksick-Vols. IV & V):	2,542.00
09/11/18	Veritext Company (Deposition of Todd Jaksick, Vol. III):	1,129.25
09/27/18	Veritext Company (Deposition of Todd Jaksick, Vol. IV):	1,348.10

1	09/27/18	Captions Unlimited, Inc. (Deposition of David Jamieson):	588.70
2	09/27/18	Captions Unlimited, Inc. (Deposition of Stan Jaksick):	853.50
3	10/01/18	Captions Unlimited, Inc. (Deposition of Pierre Hascheff, Vol. 1):	930.60
4	11/15/18	Captions Unlimited, Inc. (Deposition of Todd Jaksick, Vols. V & VI):	826.20
5	11/19/18	Bonanza Reporting & Video Conference Center (Deposition of Kevin Riley, Vol. II):	389.05
6	11/19/18	Bonanza Reporting & Video Conference Center (Deposition of Kevin Riley, Vol. I):	658.95
7	12/12/18	Bonanza Reporting & Video Conference Center (Deposition of Pierre Hascheff):	677.60
8	02/05/19	Veritext Company (Deposition of Kevin Riley, Vol. IV):	841.60
9	02/05/19	Veritext Company (Deposition of Kevin Riley, Vol. III):	1,114.30
10	02/05/19	Veritext Company (Deposition of Nanette Childers):	545.15
11	02/11/19	A Corrao Video Services, LLC (Video Deposition of Todd Jaksick, Vols. I, II, V, & VI):	731.72
12	02/12/19	Captions Unlimited, Inc. (Depositions of Frank Campagna & Gary Stolbach):	2,044.53
13	02/12/19	Veritext Company (Deposition of Jessica Clayton):	1,627.75
14	02/12/19	Veritext Company (Virtual Service Fee for Deposition James Green):	225.00
15	02/12/19	Veritext Company (Deposition of Todd Jaksick, Vol. VII):	1,117.65
16	02/12/19	Veritext Company (Deposition of James Green):	1,013.20
17	02/13/19	Veritext Company (Deposition of Robert LeGoy):	1,127.00
18	<b>Total Court Reporters' Fees: \$38,708.73</b>		
19	<b>JURORS' FEES: (NRS 18.005(3)):</b>		
20	02/01/19	Second Judicial District Court – Jury List:	86.50
21	03/08/19	Kelsey Mosher–Juror/Witness/Party Social Media Research:	<u>1,250.00</u>
22	<b>Total Jurors' Fees: \$1,336.50</b>		
23	<b><u>WITNESS FEES: (NRS 18.005(4))</u></b>		
24	08/02/18	David Jamieson (Witness & Mileage Fees–Deposition):	38.00
25	///		

1	08/13/18	Custodian of Records-Montreux Golf Club Holding Company, LLC (Witness & Mileage-Deposition):	31.00
2	08/13/18	Custodian of Records-Montreux Development Group, LLC (Witness & Mileage-Deposition):	37.00
3	08/13/18	Custodian of Records-Toiyabe Investment Co. (Witness & Mileage-Deposition):	37.00
4	08/13/18	Custodian of Records-Montreux Golf Club Ltd. (Witness & Mileage-Deposition):	38.00
5	08/13/18	Custodian of Records-Jaksick Family, LLC (Witness & Mileage- Deposition):	38.00
6	08/13/18	Custodian of Records-Lakeridge Golf Course, Ltd. (Witness & Mileage-Deposition):	<u>38.00</u>
7	<b>Total Witness Fees:</b>		<b>\$ 257.00</b>
8	<b><u>SERVICE FEES: (NRS 18.005(7))</u></b>		
9	08/29/18	Reno Carson Messenger Service (Subpoena-David Jamieson):	<u>59.50</u>
10	<b>Total Service Fees:</b>		<b>\$ 59.50</b>
11	<b><u>OFFICIAL / TRIAL REPORTING FEES: (NRS 18.005(8))</u></b>		
12	02/06/18	Sunshine Reporting & Litigation Services (CMC-1/4/18):	90.00
13	11/27/18	Sunshine Reporting & Litigation Services (Hearing Excerpt-11/16/18):	152.57
14	02/19/19	Sunshine Reporting & Litigation Services (Appearance 1/22/19):	20.00
15	02/28/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft Todd Jaksick-2/19/19):	160.00
16	03/05/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-2/22/19):	357.00
17	03/08/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-2/28/19):	487.10
18	03/08/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-3/4/19):	430.50
19	03/11/19	Sunshine Reporting & Litigation Services (Trial-Opening Statements-2/15/19):	121.00
20	03/09/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-Todd Jaksick-2/20/19):	302.75
21	03/09/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-Todd Jaksick-2/21/19):	367.50
22	03/09/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-2/26/19):	395.50
23	03/09/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-2/27/19):	430.50

1	03/09/19	Sunshine Reporting & Litigation Services (Trial-Rough Draft-3/1/19):	229.25
2	03/09/19	Sunshine Reporting & Litigation Services (1/4 Cost-Transcript-3/1/19):	<u>127.66</u>
3		<b>Total Official / Trial Reporting Fees:</b>	<b>\$3,671.33</b>
4		<b><u>PHOTOCOPIES:</u> (NRS 18.005(12))</b>	
5	02/27/18	Sierra Document Management:	360.18
6	04/24/18	Sierra Document Management:	142.04
7	04/24/18	Sierra Document Management:	38.54
8	05/18/18	Sierra Document Management:	63.81
9	05/18/18	Sierra Document Management:	1,036.75
10	05/22/18	Sierra Document Management:	159.17
11	05/24/18	Sierra Document Management:	202.22
12	05/31/18	Sierra Document Management:	63.01
13	05/31/18	Sierra Document Management:	40.60
14	05/31/18	Sierra Document Management:	134.19
15	06/05/18	Sierra Document Management:	202.38
16	06/18/18:	Sierra Document Management:	112.66
17	07/16/18	Sierra Document Management:	135.72
18	08/27/18	Sierra Document Management:	58.64
19	08/27/18	Sierra Document Management:	93.45
20	08/29/18	Sierra Document Management:	187.98
21	09/06/18	Sierra Document Management:	40.60
22	09/19/18	Sierra Document Management:	564.56
23	10/15/18	Sierra Document Management:	120.72
24	10/24/18	Sierra Document Management:	1,799.10
25	12/27/18	Sierra Document Management:	113.39
26	01/15/19	Sierra Document Management:	40.60
27	02/04/19:	Sierra Document Management:	155.38
28	02/06/19	Sierra Document Management:	892.00

1	02/06/19	Sierra Document Management:	224.78
2	02/06/19	Sierra Document Management:	363.86
3	02/06/19	Sierra Document Management:	1,175.16
4	02/11/19	Sierra Document Management:	390.24
5	02/12/19	Sierra Document Management:	100.99
6		RSSB In-house Photocopy Expense:	<u>2,118.95</u>
7		<b>Total Photocopies:</b>	<b>\$11,131.67</b>
8		<b><u>POSTAGE: (NRS 18.005(14))</u></b>	
9	04/24/18	Federal Express (to Wendy Carlson):	57.96
10	04/24/18	Federal Express (from Brian Connelly):	28.80
11	07/17/18	Federal Express (to James Green):	119.66
12	07/17/18	Federal Express (to James Green):	36.44
13	09/20/18	Federal Express (to James Green):	36.44
14	11/19/18	Federal Express (to Spencer & Johnson, PLLC):	34.91
15	11/19/18	Federal Express (to Mark Connot, Esq.):	32.60
16	02/13/19	Federal Express (to Mark Connot, Esq.):	33.11
17	02/13/19	Federal Express (to Kevin Spencer, Esq.):	35.44
18	02/13/19	Federal Express (to Kevin Spencer, Esq.):	35.35
19	02/13/19	Federal Express (to Mark Connot, Esq.):	33.03
20		RSSB In-house Postage:	<u>218.24</u>
21		<b>Total Postage:</b>	<b>\$701.98</b>
22		<b><u>OTHER EXPENSES / LEGAL RESEARCH: (NRS 18.005(17))</u></b>	
23	02/01/18	Thomson Reuters – West – Research:	20.51
24	03/12/18	Thomson Reuters – West – Research:	361.73
25	04/02/18	Cypress Systems – Professional Services:	40.00
26	04/09/18	Thomson Reuters – West – Research:	80.37
27	04/24/18	Thomson Reuters – West – Research:	153.03
28	05/31/18	Thomson Reuters – West – Research:	804.52



1	07/11/18	Thomson Reuters – West – Research:	9.64
2	10/01/18	Thomson Reuters – West – Research:	303.24
3	11/27/18	Thomson Reuters – West – Research:	119.21
4	12/14/18	Thomson Reuters – West – Research:	109.61
5	02/13/19	Thomson Reuters – West – Research:	166.20
6	02/20/19	Thomson Reuters – West – Research:	<u>1,098.27</u>
7		<b>Total Other Expenses:</b>	<b>\$ 3,266.33</b>

8			
9		<b>TOTAL COSTS AND DISBURSEMENTS:</b>	<b>\$ 59,533.04</b>

10

11 **AFFIRMATION**

12 **Pursuant to NRS 239B.030**

13 The undersigned does hereby affirm that this document does not contain the social security

14 number of any person.

15

16 STATE OF NEVADA )

17 ) ss.

18 COUNTY OF WASHOE )

19 KENT R. ROBISON, being first duly sworn, deposes and says under penalty of perjury:

20 That he is the attorney for the Respondents, Todd B. Jaksick, Incline TSS, Ltd., and Duck

21 Lake Ranch, LLC named in the foregoing **TODD B. JAKSICK, INDIVIDUALLY, INCLINE**

22 **TSS, LTD., AND DUCK LAKE RANCH, LLC'S MEMORANDUM OF COSTS AND**

23 **DISBURSEMENTS INCURRED IN CASE NO. PR17-00445**, and as such is better informed

24 relative to the above costs and disbursements than the said Respondents; that the items contained

25 in the above Memorandum and Exhibit 1, attached hereto, are correct, to the best of this deponent's

26 knowledge and belief, and that the said disbursements are reasonable and have been necessarily

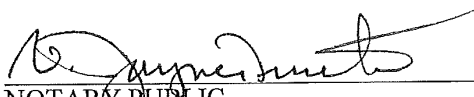
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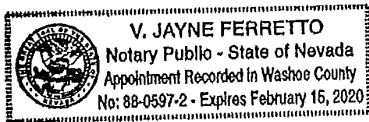
incurred and paid in said action.

  
KENT R. ROBISON

STATE OF NEVADA       )  
COUNTY OF WASHOE    ) ss.

Subscribed and Sworn to Before  
me this 11th day of March, 2019,  
by Kent R. Robison.


  
NOTARY PUBLIC



1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP,  
3 SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the **TODD B.**  
4 **JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE RANCH, LLC'S**  
**MEMORANDUM OF COSTS AND DISBURSEMENTS INCURRED IN CASE NO. PR17-**  
**00445** on all parties to this action by the method(s) indicated below:

5 \_\_\_\_\_ by placing an original or true copy thereof in a sealed envelope, with sufficient postage  
affixed thereto, in the United States mail at Reno, Nevada, addressed to:

6  by using the Court's CM/ECF electronic service system courtesy copy addressed to:

7 **Donald A. Lattin, Esq.**

8 **L. Robert LeGoy, Jr., Esq.**

9 **Brian C. McQuaid, Esq.**

10 **Carolyn K. Renner, Esq.**

Maupin, Cox & LeGoy

4785 Caughlin Parkway

P. O. Box 30000

Reno, Nevada 89519

Email: [dlattin@mcllawfirm.com](mailto:dlattin@mcllawfirm.com)

[blegoy@mcllawfirm.com](mailto:blegoy@mcllawfirm.com)

[bmcquaid@mcllawfirm.com](mailto:bmcquaid@mcllawfirm.com)

[crenner@mcllawfirm.com](mailto:crenner@mcllawfirm.com)

*Attorneys for Petitioners/Co-Trustees*

*Todd B. Jaksick and Michael S. Kimmel of the*

*SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust and Kevin Riley*

*and Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

15 **Phil Kreitlein, Esq. / Stephen C. Moss, Esq.**

Kreitlein Law Group

1575 Delucchi Lane, Suite 101

Reno, Nevada 89502

Email: [philip@kreitleinlaw.com](mailto:philip@kreitleinlaw.com) / [smoss@kreitleinlaw.com](mailto:smoss@kreitleinlaw.com)

*Attorneys for Stanley S. Jaksick, Co-Trustee Samuel S. Jaksick Jr., Family Trust*

19 **Adam Hosmer-Henner, Esq.**

20 **Sarah A. Ferguson, Esq.**

McDonald Carano

100 West Liberty Street, 10<sup>th</sup> Floor

P.O. Box 2670

Reno, NV 89505

Email: [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com) / [sferguson@mcdonaldcarano.com](mailto:sferguson@mcdonaldcarano.com)

*Attorneys for Stanley S. Jaksick, Individually and as Beneficiary of the*

*Samuel S. Jaksick Jr. Family Trust and SSJ Issue Trust and*

*Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

25 **Mark J. Connot, Esq.**

26 Fox Rothschild LLP

1980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

Email: [mconnot@foxrothschild.com](mailto:mconnot@foxrothschild.com)

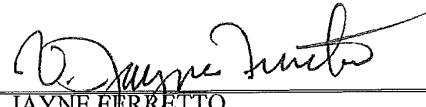
*Attorney for Respondent Wendy A. Jaksick*

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**R. Kevin Spencer, Esq. / Zachary E. Johnson, Esq.**  
Spencer & Johnson PLLC  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
Email [kevin@dallasprobate.com](mailto:kevin@dallasprobate.com) / [zach@dallasprobate.com](mailto:zach@dallasprobate.com)  
*Attorneys for Respondent Wendy A. Jaksick*

- \_\_\_\_\_ by electronic email addressed to the above and to the following:
- \_\_\_\_\_ by personal delivery/hand delivery addressed to:
- \_\_\_\_\_ by facsimile (fax) addressed to:
- \_\_\_\_\_ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 11th day of March, 2019.

  
\_\_\_\_\_  
V. JAYNE FERRETTO  
Employee of Robison, Sharp, Sullivan & Brust

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**EXHIBIT LIST**

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
1	RSSB Detail Cost Transaction File List	5

FILED  
Electronically  
PR17-00445  
2019-03-11 01:16:42 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7159160 : csulezic

**EXHIBIT 1**

**EXHIBIT 1**

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
<b>Client ID 1368.001 Jaksick/Todd</b>							
1368.001	09/25/2017	1	A	87		95.50 In house photocopy expense.	ARCH
1368.001	12/21/2017	1	A	29		-52.00 Transfer 1/2 of the costs over to the .002 (446) matter.	ARCH
1368.001	12/22/2017	1	A	87		8.50 In house photocopy expense.	ARCH
1368.001	02/01/2018	1	A	85		20.51 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	02/06/2018	1	A	85		90.00 Check issued to Sunshine Reporting & Litigation Services Civil appearance fee. (1/4/18)	ARCH
1368.001	02/23/2018	1	A	87		7.50 In house photocopy expense.	ARCH
1368.001	02/27/2018	1	A	85		360.18 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	03/12/2018	1	A	85		361.73 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	03/23/2018	1	A	90		9.20 Postage.	ARCH
1368.001	03/23/2018	1	A	87		5.75 In house photocopy expense.	ARCH
1368.001	04/02/2018	1	A	85		40.00 Check issued to Cypress Systems Professional services.	ARCH
1368.001	04/09/2018	1	A	85		80.37 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	04/24/2018	1	A	85		57.96 Check issued to Federal Express Delivery to Wendy Carlson.	ARCH
1368.001	04/24/2018	1	A	85		28.80 Check issued to Federal Express Delivery from Brian Connelly.	ARCH
1368.001	04/24/2018	1	A	85		142.04 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	04/24/2018	1	A	85		153.03 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	04/24/2018	1	A	85		38.54 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	04/25/2018	1	A	90		7.10 Postage.	ARCH
1368.001	04/25/2018	1	A	87		20.00 In house photocopy expense.	ARCH
1368.001	05/18/2018	1	A	85		63.81 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/18/2018	1	A	85		1,036.75 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/22/2018	1	A	85		159.17 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/22/2018	1	A	90		8.15 Postage.	ARCH
1368.001	05/22/2018	1	A	87		21.25 In house photocopy expense.	ARCH
1368.001	05/24/2018	1	A	85		202.22 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/31/2018	1	A	85		804.52 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	05/31/2018	1	A	85		63.01 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/31/2018	1	A	85		40.60 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	05/31/2018	1	A	85		134.19 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Jaksick Family, LLC Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Montreux Golf Club Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Toiyabe Investment Co. Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Lakeridge Golf Course Ltd. Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Montreux Development Group, LLC Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/04/2018	1	A	85		<del>30.00</del> Check issued to Montreux Golf Club Holding Company, LLC Witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	06/05/2018	1	A	85		202.38 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	06/18/2018	1	A	85		112.66 Check issued to Sierra Document Managment Copy services.	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
<b>Client ID 1368.001 Jaksick/Todd</b>							
1368.001	06/18/2018	1	A	85		2,588.79 Check issued to A Corrao Video Services, LLC Video deposition services.	ARCH
1368.001	06/20/2018	1	A	90		24.39 Postage.	ARCH
1368.001	06/20/2018	1	A	87		43.25 In house photocopy expense.	ARCH
1368.001	07/09/2018	1	A	85		4,323.00 Check issued to Captions Unlimited, Inc. Deposition of Wendy Jaksick.	ARCH
1368.001	07/11/2018	1	A	85		9.64 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	07/16/2018	1	A	85		135.72 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	07/17/2018	1	A	85		119.66 Check issued to Federal Express Delivery to James A. Green.	ARCH
1368.001	07/17/2018	1	A	85		36.44 Check issued to Federal Express Delivery to James A. Green.	ARCH
1368.001	07/23/2018	1	A	90		12.45 Postage.	ARCH
1368.001	07/23/2018	1	A	87		297.50 In house photocopy expense.	ARCH
1368.001	08/02/2018	1	A	85		38.00 Check issued to David Jamison Witness and mileage fees - deposition.	ARCH
1368.001	08/06/2018	1	A	85		1,030.20 Check issued to Captions Unlimited, Inc. Deposition of Wendy Jaksick, Volume I.	ARCH
1368.001	08/13/2018	1	A	85		31.00 Check issued to Custodian of Records - Montreux Witness & mileage fees - deposition.	ARCH
1368.001	08/13/2018	1	A	85		37.00 Check issued to Custodian of Records - Montreux Witness & mileage fees - deposition.	ARCH
1368.001	08/13/2018	1	A	85		37.00 Check issued to Custodian of Records - Toiyabe Witness & mileage fees - deposition.	ARCH
1368.001	08/13/2018	1	A	85		38.00 Check issued to Custodian of Records - Montreux Witness & mileage fees - deposition.	ARCH
1368.001	08/13/2018	1	A	85		38.00 Check issued to Custodian of Records-Jaksick Family LLC Witness & mileage fees - deposition.	ARCH
1368.001	08/13/2018	1	A	85		38.00 Check issued to Custodian of Records - Lakeridge Golf Witness & mileage fees - deposition.	ARCH
1368.001	08/22/2018	1	A	87		261.00 In house photocopy expense.	ARCH
1368.001	08/23/2018	1	A	85		1,535.86 Check issued to A Corrao Video Services, LLC Video deposition of Wendy Jaksick.	ARCH
1368.001	08/23/2018	1	A	85		3,093.93 Check issued to A Corrao Video Services, LLC Video deposition of Stanley Jaksick.	ARCH
1368.001	08/23/2018	1	A	85		125.15 Check issued to A Corrao Video Services, LLC Video deposition of Todd Jaksick.	ARCH
1368.001	08/27/2018	1	A	85		4,624.50 Check issued to Captions Unlimited, Inc. Deposition of Stanley Jaksick Vol 1 - 3.	ARCH
1368.001	08/27/2018	1	A	85		58.64 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	08/27/2018	1	A	85		93.45 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	08/27/2018	1	A	85		547.10 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Todd Jaksick.	ARCH
1368.001	08/29/2018	1	A	85		187.98 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	08/29/2018	1	A	85		59.50 Check issued to Reno Carson Messenger Service Service of subpoena on David Jamison.	ARCH
1368.001	09/06/2018	1	A	85		40.60 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	09/06/2018	1	A	85		508.35 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Todd Jaksic Vol. II.	ARCH
1368.001	09/06/2018	1	A	85		2,542.00 Check issued to Captions Unlimited, Inc. Deposition of Wendy Jaksick Vol. IV & V.	ARCH
1368.001	09/11/2018	1	A	85		1,129.25 Check issued to Veritext Company Deposition of Todd Jaksick, Vol. III.	ARCH
1368.001	09/19/2018	1	A	85		564.56 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	09/20/2018	1	A	85		36.44 Check issued to Federal Express Delivery to James A Green.	ARCH
1368.001	09/25/2018	1	A	90		9.20 Postage.	ARCH



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
<b>Client ID 1368.001 Jaksick/Todd</b>							
1368.001	09/25/2018	1	A	87		84.75 In house photocopy expense.	ARCH
1368.001	09/27/2018	1	A	85		1,348.10 Check issued to Veritext Company Deposition of Todd Jaksick, Vol. IV.	ARCH
1368.001	09/27/2018	1	A	85		588.70 Check issued to Captions Unlimited, Inc. Deposition of David Jamieson.	ARCH
1368.001	09/27/2018	1	A	85		853.50 Check issued to Captions Unlimited, Inc. Deposition of Stan Jaksick.	ARCH
1368.001	10/01/2018	1	A	85		930.60 Check issued to Captions Unlimited, Inc. Deposition of Peirre Hascheff, Vol. I.	ARCH
1368.001	10/01/2018	1	A	85		303.24 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	10/15/2018	1	A	85		120.72 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	10/24/2018	1	A	85		1,799.10 Check issued to Sierra Document Managment Copy services.	ARCH
1368.001	10/25/2018	1	A	90		30.02 Postage.	ARCH
1368.001	10/25/2018	1	A	87		251.00 In house photocopy expense.	ARCH
1368.001	11/15/2018	1	A	85		826.20 Check issued to Captions Unlimited, Inc. Deposition of Todd Jaksick, Vol V and VI.	ARCH
1368.001	11/19/2018	1	A	85		389.05 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Kevin Riley, Vol. II.	ARCH
1368.001	11/19/2018	1	A	85		658.95 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Kevin Riley, Vol. I.	ARCH
1368.001	11/19/2018	1	A	85		34.91 Check issued to Federal Express Delivery to Spencer & Johnson, PLLC.	ARCH
1368.001	11/19/2018	1	A	85		32.60 Check issued to Federal Express Delivery to Mark J. Connot, Esq.	ARCH
1368.001	11/24/2018	1	A	90		14.88 Postage.	ARCH
1368.001	11/24/2018	1	A	87		154.75 In house photocopy expense.	ARCH
1368.001	11/27/2018	1	A	85		152.57 Check issued to Sunshine Reporting & Litigation Services Hearing excerpt. (11/16/18)	ARCH
1368.001	11/27/2018	1	A	85		119.21 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	12/12/2018	1	A	85		677.60 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Pierre Hascheff.	ARCH
1368.001	12/14/2018	1	A	85		109.61 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	12/21/2018	1	A	90		55.80 Postage.	ARCH
1368.001	12/21/2018	1	A	87		315.75 In house photocopy expense.	ARCH
1368.001	12/27/2018	1	A	85		113.39 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	01/15/2019	1	A	85		40.60 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	01/25/2019	1	A	87		90.25 In house photocopy expense.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86837 issued to Jaksick Family, LLC for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86838 issued to Montreux Golf Club for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86839 issued to Toiyabe Investment Co. for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86840 issued to Lakeridge Golf Course Ltd. for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86841 issued to Montreux Development Group, LLC for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/25/2019	1	A	29		-30.00 Stale Date Ck#86842 issued to Montreux Golf Club Holding Co., LLC for witness & mileage fees - NRCP 30(b)(6) deposition.	ARCH
1368.001	01/29/2019	1	A	85		94.50 Check issued to Debra Robertson Administrative overtime.	ARCH
1368.001	02/01/2019	1	A	85		86.50 Check issued to Second Judicial District Court for jury list.	ARCH
1368.001	02/04/2019	1	A	85		5.00 Check issued to Chase Ink Card Parking meter.	ARCH
1368.001	02/04/2019	1	A	85		200.00 Check issued to Chase Ink Card Filing fee - Motion for summary judgment.	ARCH
1368.001	02/04/2019	1	A	85		200.00 Check issued to Chase Ink Card	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
Client ID 1368.001 Jaksick/Todd							
1368.001	02/04/2019	1	A	85		Filing fee - Motion for summary judgment. 155.38 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/05/2019	1	A	85		841.60 Check issued to Veritext Company Deposition of Kevin Riley, Vol. IV.	ARCH
1368.001	02/05/2019	1	A	85		1,114.30 Check issued to Veritext Company Deposition of Kevin Riley, Vol. III.	ARCH
1368.001	02/05/2019	1	A	85		545.15 Check issued to Veritext Company Deposition of Nanette Childers.	ARCH
1368.001	02/06/2019	1	A	85		892.00 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/06/2019	1	A	85		224.78 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/06/2019	1	A	85		363.86 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/06/2019	1	A	85		1,175.16 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/11/2019	1	A	85		390.24 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/11/2019	1	A	85		731.72 Check issued to A Corrao Video Services, LLC Video deposition of Todd Jaksick Vol I, II, V, VI.	ARCH
1368.001	02/12/2019	1	A	85		2,044.53 Check issued to Captions Unlimited, Inc. Depositions of Frank Campagna & Gary Stolbach.	ARCH
1368.001	02/12/2019	1	A	85		100.99 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	02/12/2019	1	A	85		1,627.75 Check issued to Veritext Company Deposition of Jessica Clayton.	ARCH
1368.001	02/12/2019	1	A	85		225.00 Check issued to Veritext Company Virtual service fee for deposition of James A. Green.	ARCH
1368.001	02/12/2019	1	A	85		1,117.65 Check issued to Veritext Company Deposition of Todd Jaksick Vol. VII.	ARCH
1368.001	02/12/2019	1	A	85		1,013.20 Check issued to Veritext Company Deposition of James A Green.	ARCH
1368.001	02/13/2019	1	A	85		1,127.00 Check issued to Veritext Company Court reporter.	ARCH
1368.001	02/13/2019	1	A	85		33.11 Check issued to Federal Express Delivery to Mark J. Connot, Esq.	ARCH
1368.001	02/13/2019	1	A	85		35.44 Check issued to Federal Express Delivery to R. Kevin Spencer, Esq.	ARCH
1368.001	02/13/2019	1	A	85		35.35 Check issued to Federal Express Delivery to R. Kevin Spencer, Esq.	ARCH
1368.001	02/13/2019	1	A	85		33.03 Check issued to Federal Express Delivery to Mark J. Connot, Esq.	ARCH
1368.001	02/13/2019	1	A	85		166.20 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	02/19/2019	1	A	85		20.00 Check issued to Sunshine Reporting & Litigation Services Civil appearance fee 1/22/2019.	ARCH
1368.001	02/20/2019	1	A	85		1,098.27 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	02/22/2019	1	A	90		47.05 Postage.	ARCH
1368.001	02/22/2019	1	A	87		514.20 In house photocopy expense.	ARCH
1368.001	02/28/2019	1	P	85		<del>20.00</del> Check issued to City of Reno Parking Ticket Parking fee.	136
1368.001	02/28/2019	1	P	85		160.00 Check issued to Sunshine Reporting & Litigation Services Civil appearance fee - Todd Jaksick. (2/19/19)	137
1368.001	03/05/2019	1	P	85		357.00 Check issued to Sunshine Reporting & Litigation Services Jury trial - rough draft. (2/22/19)	138
1368.001	03/05/2019	1	P	85		<del>20.00</del> Check issued to City of Reno Parking Ticket Parking fee.	139
1368.001	03/05/2019	1	P	85		<del>20.00</del> Check issued to City of Reno Parking Ticket Jury trial - rough draft.	140
1368.001	03/05/2019	1	P	85		<del>20.00</del> Check issued to City of Reno Parking Ticket Parking fee.	141
1368.001	03/08/2019	1	P	85		1,250.00 Check issued to Kelsey Mosher for Juror/Witness/Party Social	142

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
<b>Client ID 1368.001 Jaksick/Todd</b>							
						Media Research	
1368.001	03/08/2019	1	P	85	430.50	Check issued to Sunshine Reporting & Litigation Services for Jury Trial - Rough (3/4/19)	143
1368.001	03/08/2019	1	P	85	487.10	Check issued to Sunshine Reporting & Litigation Services for Jury Trial - Rough Draft (2/28/19)	144
1368.001	03/11/2019	1	P	85	121.00	Check issued to Sunshine Reporting & Litigation Services Jury trial - openng statements. (2/15/19)	145
1368.001	03/11/2019	1	P	85	302.75	Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft. (2/20/19)	146
1368.001	03/11/2019	1	P	85	367.50	Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft. (2/21/19)	147
1368.001	03/11/2019	1	P	85	395.50	Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft. (2/26/19)	148
1368.001	03/11/2019	1	P	85	430.50	Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft. (2/27/19)	149
1368.001	03/11/2019	1	P	85	229.25	Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft. (3/1/19)	150
1368.001	03/11/2019	1	P	85	127.66	Check issued to Sunshine Reporting & Litigation Services Transcript of proceedings. (3/1/19)	151
<b>Total for Client ID 1368.001</b>					Billable	59,712.54	Jaksick/Todd (445) SSJs Trust
<b>GRAND TOTALS</b>							
					Billable	59,712.54	

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2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 3**

**EXHIBIT 3**

1953

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*Attorneys for Todd B. Jaksick, Individually,*

*Incline TSS, Ltd., and Duck Lake Ranch, LLC*

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

In the Matter of the:

**CASE NO.: PR17-00445**

SSJ's ISSUE TRUST.

**DEPT. NO.: 15**

In the Matter of the:

**CASE NO.: PR17-00446**

SAMUEL S. JAKSICK, JR., FAMILY TRUST.

**DEPT. NO.: 15**

WENDY JAKSICK,

Respondent and Counter-Petitioner,

v.

TODD B. JAKSICK, Individually, as Co-Trustee of the Samuel S. Jaksick Jr. Family Trust, and as Trustee of the SSJ's Issue Trust; MICHAEL S. KIMMEL, Individually and as Co-Trustee of the Samuel S. Jaksick Jr. Family Trust; STANLEY S. JAKSICK, Individually and as Co-Trustee of the Samuel S. Jaksick Jr. Family Trust; KEVIN RILEY, Individually, as Former Trustee of the Samuel S. Jaksick Jr. Family Trust, and as Trustee of the Wendy A. Jaksick 2012 BHC Family Trust, INCLINE TSS, LTD.; DUCK LAKE RANCH, LLC;

**TODD B. JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE RANCH, LLC'S MEMORANDUM OF COSTS AND DISBURSEMENTS INCURRED IN CASE NO. PR17-00446**

Petitioners and Counter-Respondents.

**TODD B. JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE  
RANCH, LLC'S MEMORANDUM OF COSTS AND  
DISBURSEMENTS INCURRED IN CASE NO. PR17-00446**

The following constitutes an itemization of costs and disbursements incurred by Respondents Todd B. Jaksick, individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC in Case No. PR17-00446. Attached hereto as support is **Exhibit 1**, which is a Detail Cost Transaction File List that records each cost and disbursement charged to the Respondents Todd B. Jaksick, individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC in Case No. PR17-00446, and paid by the law firm of Robison, Sharp, Sullivan & Brust.

**PHOTOCOPIES: (NRS 18.005(12))**

02/27/18	Sierra Document Management:	360.18
04/24/18	Sierra Document Management:	142.04
04/24/18	Sierra Document Management:	38.54
05/18/18	Sierra Document Management:	63.81
05/18/18	Sierra Document Management:	1,036.75
05/22/18	Sierra Document Management:	159.17
05/24/18	Sierra Document Management:	202.22
05/31/18	Sierra Document Management:	63.01
05/31/18	Sierra Document Management:	40.60
05/31/18	Sierra Document Management:	134.19
06/05/18	Sierra Document Management:	202.38
06/18/18:	Sierra Document Management:	112.66
07/16/18	Sierra Document Management:	135.72
08/27/18	Sierra Document Management:	58.64
08/27/18	Sierra Document Management:	93.45
08/29/18	Sierra Document Management:	187.98
09/06/18	Sierra Document Management:	40.60
09/19/18	Sierra Document Management:	564.56

1	10/15/18	Sierra Document Management:	120.72
2	10/24/18	Sierra Document Management:	1,799.10
3	12/27/18	Sierra Document Management:	113.39
4	01/15/19	Sierra Document Management:	40.60
5	02/04/19:	Sierra Document Management:	155.38
6	02/06/19	Sierra Document Management:	892.00
7	02/06/19	Sierra Document Management:	224.78
8	02/06/19	Sierra Document Management:	363.86
9	02/06/19	Sierra Document Management:	1,175.16
10	02/11/19	Sierra Document Management:	390.24
11	02/12/19	Sierra Document Management:	100.99
12		RSSB In-house Photocopy Expense:	<u>52.00</u>
13		<b>Total Photocopies:</b>	<b>\$9,064.72</b>
14		<b><u>OTHER EXPENSES / LEGAL RESEARCH: (NRS 18.005(17))</u></b>	
15	04/02/18	Cypress Systems – Professional Services:	40.00
16	11/27/18	Thomson Reuters – West – Research:	15.37
17	12/14/18	Thomson Reuters – West – Research:	140.13
18	02/13/19	Thomson Reuters – West – Research:	<u>40.81</u>
19		<b>Total Other Expenses:</b>	<b>\$236.31</b>
20		<b>TOTAL COSTS AND DISBURSEMENTS:</b>	<b>\$9,301.03</b>

**AFFIRMATION**

**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

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STATE OF NEVADA       )  
                                  ) ss.  
COUNTY OF WASHOE    )

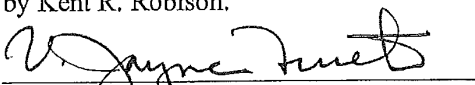
KENT R. ROBISON, being first duly sworn, deposes and says under penalty of perjury:

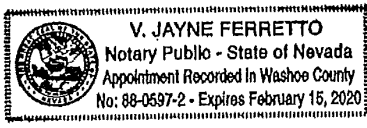
That he is the attorney for the Respondents, Todd B. Jaksick, individually, Incline TSS, Ltd., and Duck Lake Ranch, LLC named in the foregoing **TODD B. JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE RANCH, LLC'S MEMORANDUM OF COSTS AND DISBURSEMENTS INCURRED IN CASE NO. PR17-00446**, and as such is better informed relative to the above costs and disbursements than the said Respondents; that the items contained in the above Memorandum are correct, to the best of this deponent's knowledge and belief, and that the said disbursements are reasonable and have been necessarily incurred and paid in said action.

  
KENT R. ROBISON

STATE OF NEVADA       )  
COUNTY OF WASHOE    ) ss.

Subscribed and Sworn to Before  
me this 11th day of March, 2019,  
by Kent R. Robison.

  
NOTARY PUBLIC






1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP,  
3 SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the **TODD B.**  
4 **JAKSICK, INDIVIDUALLY, INCLINE TSS, LTD., AND DUCK LAKE RANCH, LLC'S**  
**MEMORANDUM OF COSTS AND DISBURSEMENTS INCURRED IN CASE NO. PR17-**  
**00446** on all parties to this action by the method(s) indicated below:

5 — by placing an original or true copy thereof in a sealed envelope, with sufficient postage  
affixed thereto, in the United States mail at Reno, Nevada, addressed to:

6  by using the Court's CM/ECF electronic service system courtesy copy addressed to:

7 **Donald A. Lattin, Esq.**

8 **L. Robert LeGoy, Jr., Esq.**

9 **Brian C. McQuaid, Esq.**

10 **Carolyn K. Renner, Esq.**

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*Attorneys for Petitioners/Co-Trustees*

*Todd B. Jaksick and Michael S. Kimmel of the*

*SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust and Kevin Riley*

*and Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

15 **Phil Kreitlein, Esq. / Stephen C. Moss, Esq.**

Kreitlein Law Group

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19 **Adam Hosmer-Henner, Esq.**

20 **Sarah A. Ferguson, Esq.**

McDonald Carano

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Email: [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com) / [sferguson@mcdonaldcarano.com](mailto:sferguson@mcdonaldcarano.com)

*Attorneys for Stanley S. Jaksick, Individually and as Beneficiary of the*

*Samuel S. Jaksick Jr. Family Trust and SSJ Issue Trust and*

*Stanley Jaksick, Co-Trustee Samuel S. Jaksick, Jr. Family Trust*

25 **Mark J. Connot, Esq.**

26 Fox Rothschild LLP

1980 Festival Plaza Drive, Suite 700

27 Las Vegas, Nevada 89135

Email: [mconnot@foxrothschild.com](mailto:mconnot@foxrothschild.com)

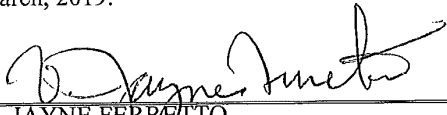
*Attorney for Respondent Wendy A. Jaksick*

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**R. Kevin Spencer, Esq. / Zachary E. Johnson, Esq.**  
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*Attorneys for Respondent Wendy A. Jaksick*

- \_\_\_\_\_ by electronic email addressed to the above and to the following:
- \_\_\_\_\_ by personal delivery/hand delivery addressed to:
- \_\_\_\_\_ by facsimile (fax) addressed to:
- \_\_\_\_\_ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 11<sup>th</sup> day of March, 2019.

  
\_\_\_\_\_  
V. JAYNE FERRITTO  
Employee of Robison, Sharp, Sullivan & Brust

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**EXHIBIT LIST**

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
1	RSSB Detail Cost Transaction File List	2

FILED  
Electronically  
PR17-00445  
2019-03-11 01:20:31 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7159167 : csulezic

**EXHIBIT 1**

**EXHIBIT 1**

Client	Trans Date	Tmlr	H P	Tcode/ Task Code	Rate	Amount	Ref #
<b>Client ID 1368.002 Jaksick/Todd</b>							
1368.002	12/21/2017	1	A	85		52.00 Transfer 1/2 of the costs over to the .002 (446) matter from the .001 (445) matter. (In-house Photocopies)	ARCH
1368.002	02/27/2018	1	A	85		360.18 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	04/02/2018	1	A	85		40.00 Check issued to Cypress Systems Professional services.	ARCH
1368.002	04/24/2018	1	A	85		142.04 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	04/24/2018	1	A	85		38.54 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/18/2018	1	A	85		63.81 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/18/2018	1	A	85		1,036.75 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/22/2018	1	A	85		159.17 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/24/2018	1	A	85		202.22 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/31/2018	1	A	85		63.01 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/31/2018	1	A	85		40.60 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	05/31/2018	1	A	85		134.19 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	06/05/2018	1	A	85		202.38 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	06/18/2018	1	A	85		112.66 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	07/16/2018	1	A	85		135.72 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	08/27/2018	1	A	85		58.64 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	08/27/2018	1	A	85		93.45 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	08/29/2018	1	A	85		187.98 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	09/06/2018	1	A	85		40.60 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	09/19/2018	1	A	85		564.56 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	10/15/2018	1	A	85		120.72 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	10/24/2018	1	A	85		1,799.10 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	11/27/2018	1	A	85		15.37 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.002	12/14/2018	1	A	85		140.13 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.002	12/27/2018	1	A	85		113.39 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	01/15/2019	1	A	85		40.60 Check issued to Sierra Document Management Copy services.	ARCH
1368.002	02/04/2019	1	P	85		155.38 Check issued to Sierra Document Management Copy services.	27
1368.002	02/06/2019	1	P	85		892.00 Check issued to Sierra Document Management Copy services.	28
1368.002	02/06/2019	1	P	85		224.78 Check issued to Sierra Document Management Copy services.	29
1368.002	02/06/2019	1	P	85		363.86 Check issued to Sierra Document Management Copy services.	30
1368.002	02/06/2019	1	P	85		1,175.16 Check issued to Sierra Document Management Copy services.	31
1368.002	02/11/2019	1	P	85		390.24 Check issued to Sierra Document Management Copy services.	32

Date: 03/05/2019

Detail Cost Transaction File List  
Robison, Sharp, Sullivan & Brust

Page: 2

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
Client ID 1368.002 Jaksick/Todd							
1368.002	02/12/2019	1	P	85		100.99	33
						Check issued to Sierra Document Management Copy services.	
1368.002	02/13/2019	1	P	85		40.81	34
						Check issued to Thomson Reuters - West Legal research.	
Total for Client ID 1368.002					Billable	9,301.03	Jaksick/Todd (446) Jaksick Family Trust
GRAND TOTALS							
					Billable	9,301.03	

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Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yviloria

**EXHIBIT 4**

**EXHIBIT 4**

1 2635  
2 KENT ROBISON, ESQ. – NSB #1167  
krobison@rssblaw.com  
3 THERESE M. SHANKS, ESQ. – NSB #12890  
tshanks@rssblaw.com  
4 Robison, Sharp, Sullivan & Brust  
A Professional Corporation  
5 71 Washington Street  
6 Reno, Nevada 89503  
Telephone: 775-329-3151  
7 Facsimile: 775-329-7169  
8 Attorneys for Todd B. Jaksick, Individually, and as Beneficiary,  
SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust  
9

10 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
11 IN AND FOR THE COUNTY OF WASHOE

12 In the Matter of the:

CASE NO.: PR17-00445

13 SSJ's ISSUE TRUST.  
14 \_\_\_\_\_ /

DEPT. NO.: 15

15 In the Matter of the:

CASE NO.: PR17-00446

16 SAMUEL S. JAKSICK, JR., FAMILY TRUST.  
17 \_\_\_\_\_ /

DEPT. NO.: 15

18 WENDY JAKSICK,

19 Respondent and Counter-Petitioner,

20 v.

**TODD B. JAKSICK, AS AN INDIVIDUAL,**  
**OFFER OF JUDGMENT TO**  
**WENDY JAKSICK**

21 TODD B. JAKSICK, Individually, as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
22 Trust, and as Trustee of the SSJ's Issue Trust;  
MICHAEL S. KIMMEL, Individually and as  
23 Co-Trustee of the Samuel S. Jaksick Jr. Family  
Trust; STANLEY S. JAKSICK, Individually  
24 and as Co-Trustee of the Samuel S. Jaksick Jr.  
Family Trust; KEVIN RILEY, Individually, as  
25 Former Trustee of the Samuel S. Jaksick Jr.  
Family Trust, and as Trustee of the Wendy A.  
26 Jaksick 2012 BHC Family Trust,

27 Petitioners and Counter-Respondents  
28 \_\_\_\_\_ /



1 STANLEY JAKSICK,  
2 Respondent and Counter-Petitioner,  
3 v.  
4 TODD B. JAKSICK, Individually and as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
5 Trust.  
6 Petitioner and Counter-Respondent.

7 **TO: WENDY JAKSICK AND HER COUNSEL OF RECORD:**

8 Pursuant to Rule 68 of the Nevada Rules of Civil Procedure, Defendant, Todd B. Jaksick,  
9 individually, and only in his capacity as individual, hereby offers to allow judgment to be taken  
10 against him, only in his individual capacity, in this action in the total sum of TWENTY-FIVE  
11 THOUSAND DOLLARS and 00/100 (\$25,000.00) and no more, which sum includes all interest,  
12 costs, attorneys' fees or otherwise which have accrued to date.

13 If you accept this offer and give written notice thereof within ten (10) days after service of  
14 same, you may file the Offer and the Notice of Acceptance, together with the Proof of Service  
15 thereof, and thereupon the Clerk is authorized to enter Judgment in accordance with the provisions  
16 of Rule 68 of the Nevada Rules of Civil Procedure.

17 In accordance with the provisions of Rule 68 of the Nevada Rules of Civil Procedure, if  
18 this offer is not accepted within ten (10) days from the date of service of same, it shall be deemed  
19 withdrawn.

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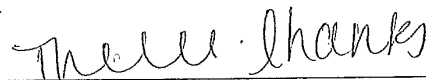
28 ///

**AFFIRMATION**  
**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 29th day of August 2018.

ROBISON, SHARP, SULLIVAN & BRUST  
A Professional Corporation  
71 Washington Street  
Reno, Nevada 89503



KENT R. ROBISON  
THERESE M. SHANKS  
*Attorneys for Todd B. Jaksick, Individually, and as  
Beneficiary, SSJ's Issue Trust and  
Samuel S. Jaksick, Jr., Family Trust*

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the **TODD B. JAKSICK, AS AN INDIVIDUAL, OFFER OF JUDGMENT TO WENDY JAKSICK** on all parties to this action by the method(s) indicated below:

X by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

Donald A. Lattin, Esq.  
L. Robert LeGoy, Jr., Esq.  
Brian C. McQuaid, Esq.  
Carolyn K. Renner, Esq.  
Maupin, Cox & LeGoy  
4785 Caughlin Parkway  
Reno, Nevada 89519

Email: [dlattin@mcllawfirm.com](mailto:dlattin@mcllawfirm.com)  
[blegoy@mcllawfirm.com](mailto:blegoy@mcllawfirm.com)  
[bmcquaid@mcllawfirm.com](mailto:bmcquaid@mcllawfirm.com)  
[crenner@mcllawfirm.com](mailto:crenner@mcllawfirm.com)

*Attorneys for Petitioners/Co-Trustees  
Todd B. Jaksick and Michael S. Kimmel of the  
SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust and Kevin Riley*

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Stephen C. Moss, Esq.  
Kreitlein Law Group  
470 E. Plumb Lane, #310  
Reno, Nevada 89502

Email: [philip@kreitleinlaw.com](mailto:philip@kreitleinlaw.com)  
[smoss@kreitleinlaw.com](mailto:smoss@kreitleinlaw.com)

*Attorneys for Stanley S. Jaksick, Co-Trustee Samuel S. Jaksick Jr., Family Trust*

Adam Hosmer-Henner, Esq.  
Sarah A. Ferguson, Esq.  
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P.O. Box 2670  
Reno, NV 89505

Email: [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)  
[sferguson@mcdonaldcarano.com](mailto:sferguson@mcdonaldcarano.com)

*Attorneys for Stanley S. Jaksick, Individually and as Beneficiary of the  
Samuel S. Jaksick Jr. Family Trust and SSJ Issue Trust*

Mark J. Connot, Esq.  
Fox Rothschild LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135

Email: [mconnot@foxrothschild.com](mailto:mconnot@foxrothschild.com)  
*Attorney for Respondent Wendy A. Jaksick*

///

1 R. Kevin Spencer, Esq.  
2 Zachary E. Johnson, Esq.  
3 Spencer & Johnson PLLC  
4 500 N. Akard Street, Suite 2150  
5 Dallas, Texas 75201  
6 Email [kevin@spencerlawpc.com](mailto:kevin@spencerlawpc.com) / [zach@spencerlawpc.com](mailto:zach@spencerlawpc.com)  
7 *Attorneys for Respondent Wendy A. Jaksick*

8 \_\_\_\_\_ by using the Court's CM/ECF electronic service system courtesy copy addressed to:

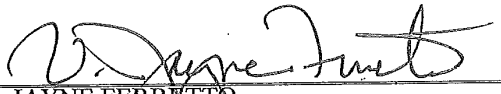
9 \_\_\_\_\_ by electronic email addressed to:

10 \_\_\_\_\_ by personal delivery/hand delivery addressed to:

11 \_\_\_\_\_ by facsimile (fax) addressed to:

12 \_\_\_\_\_ by Federal Express/UPS or other overnight delivery addressed to:

13 DATED: This 29<sup>th</sup> day of August, 2018.

14   
15 V. JAYNE FERRETTO  
16 Employee of Robison, Sharp, Sullivan & Brust

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yviloria

**EXHIBIT 5**

**EXHIBIT 5**

1 2635

2 KENT ROBISON, ESQ. – NSB #1167

3 krobison@rssblaw.com

4 THERESE M. SHANKS, ESQ. – NSB #12890

5 tshanks@rssblaw.com

6 Robison, Sharp, Sullivan & Brust

7 A Professional Corporation

8 71 Washington Street

9 Reno, Nevada 89503

10 Telephone: 775-329-3151

11 Facsimile: 775-329-7169

12 Attorneys for Todd B. Jaksick, Individually, and as Beneficiary,

13 SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust

14  
15 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

16 IN AND FOR THE COUNTY OF WASHOE

17 In the Matter of the:

CASE NO.: PR17-00445

18 SSJ's ISSUE TRUST.

DEPT. NO.: 15

19 In the Matter of the:

CASE NO.: PR17-00446

20 SAMUEL S. JAKSICK, JR., FAMILY TRUST.

DEPT. NO.: 15

21 WENDY JAKSICK,

22 Respondent and Counter-Petitioner,  
23 v.

TODD B. JAKSICK, AS AN INDIVIDUAL  
AND TRUSTEE OF THE SSJ'S ISSUE  
TRUST, OFFER OF JUDGMENT TO  
WENDY JAKSICK

24 TODD B. JAKSICK, Individually, as Co-  
25 Trustee of the Samuel S. Jaksick Jr. Family  
26 Trust, and as Trustee of the SSJ's Issue Trust;  
27 MICHAEL S. KIMMEL, Individually and as  
28 Co-Trustee of the Samuel S. Jaksick Jr. Family  
Trust; STANLEY S. JAKSICK, Individually  
and as Co-Trustee of the Samuel S. Jaksick Jr.  
Family Trust; KEVIN RILEY, Individually, as  
Former Trustee of the Samuel S. Jaksick Jr.  
Family Trust, and as Trustee of the Wendy A.  
Jaksick 2012 BHC Family Trust,

Petitioners and Counter-Respondents

1 STANLEY JAKSICK,  
2 Respondent and Counter-Petitioner,  
3 v.  
4 TODD B. JAKSICK, Individually and as Co-  
Trustee of the Samuel S. Jaksick Jr. Family  
5 Trust.  
Petitioner and Counter-Respondent.

6  
7 **TO: WENDY JAKSICK AND HER COUNSEL OF RECORD:**

8 Pursuant to Rule 68 of the Nevada Rules of Civil Procedure, Defendant, Todd B. Jaksick,  
9 individually and as Trustee of the SSJ's Issue Trust, only in his capacity as individual and Trustee,  
10 hereby offers to allow judgment to be taken against him, only in his individual and Trustee  
11 capacity, in this action in the total sum of TWENTY-FIVE THOUSAND DOLLARS and 00/100  
12 (\$25,000.00) and no more, which sum includes all interest, costs, attorneys' fees or otherwise  
13 which have accrued to date.

14 If you accept this offer and give written notice thereof within ten (10) days after service of  
15 same, you may file the Offer and the Notice of Acceptance, together with the Proof of Service  
16 thereof, and thereupon the Clerk is authorized to enter Judgment in accordance with the provisions  
17 of Rule 68 of the Nevada Rules of Civil Procedure.

18 In accordance with the provisions of Rule 68 of the Nevada Rules of Civil Procedure, if  
19 this offer is not accepted within ten (10) days from the date of service of same, it shall be deemed  
20 withdrawn.

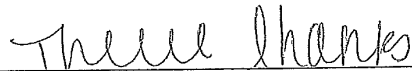
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**AFFIRMATION**  
**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 29th day of August 2018.

ROBISON, SHARP, SULLIVAN & BRUST  
A Professional Corporation  
71 Washington Street  
Reno, Nevada 89503



KENT R. ROBISON  
THERESE M. SHANKS

*Attorneys for Todd B. Jaksick, Individually, and as  
Beneficiary, SSJ's Issue Trust and  
Samuel S. Jaksick, Jr., Family Trust*



CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the **TODD B. JAKSICK, AS AN INDIVIDUAL AND TRUSTEE OF THE SSJ'S ISSUE TRUST, OFFER OF JUDGMENT TO WENDY JAKSICK** on all parties to this action by the method(s) indicated below:

X by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

Donald A. Lattin, Esq.  
L. Robert LeGoy, Jr., Esq.  
Brian C. McQuaid, Esq.  
Carolyn K. Renner, Esq.  
Maupin, Cox & LeGoy  
4785 Caughlin Parkway  
Reno, Nevada 89519  
Email: [dlattin@mcllawfirm.com](mailto:dlattin@mcllawfirm.com)  
[blegoy@mcllawfirm.com](mailto:blegoy@mcllawfirm.com)  
[bmcquaid@mcllawfirm.com](mailto:bmcquaid@mcllawfirm.com)  
[crenner@mcllawfirm.com](mailto:crenner@mcllawfirm.com)

*Attorneys for Petitioners/Co-Trustees  
Todd B. Jaksick and Michael S. Kimmel of the  
SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust and Kevin Riley*

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Stephen C. Moss, Esq.  
Kreitlein Law Group  
470 E. Plumb Lane, #310  
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[smoss@kreitleinlaw.com](mailto:smoss@kreitleinlaw.com)

*Attorneys for Stanley S. Jaksick, Co-Trustee Samuel S. Jaksick Jr., Family Trust*

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Sarah A. Ferguson, Esq.  
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P.O. Box 2670  
Reno, NV 89505  
Email: [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)  
[sferguson@mcdonaldcarano.com](mailto:sferguson@mcdonaldcarano.com)

*Attorneys for Stanley S. Jaksick, Individually and as Beneficiary of the  
Samuel S. Jaksick Jr. Family Trust and SSJ Issue Trust*

Mark J. Connot, Esq.  
Fox Rothschild LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
Email: [mconnot@foxrothschild.com](mailto:mconnot@foxrothschild.com)  
*Attorney for Respondent Wendy A. Jaksick*


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R. Kevin Spencer, Esq.  
Zachary E. Johnson, Esq.  
Spencer & Johnson PLLC  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
Email [kevin@spencerlawpc.com](mailto:kevin@spencerlawpc.com) / [zach@spencerlawpc.com](mailto:zach@spencerlawpc.com)  
*Attorneys for Respondent Wendy A. Jaksick*

- ☐ by using the Court's CM/ECF electronic service system courtesy copy addressed to:
- ☐ by electronic email addressed to:
- ☐ by personal delivery/hand delivery addressed to:
- ☐ by facsimile (fax) addressed to:
- ☐ by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 29<sup>th</sup> day of August, 2018.

  
\_\_\_\_\_  
V. JAYNE HERRETTO  
Employee of Robison, Sharp, Sullivan & Brust

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 6**

**EXHIBIT 6**

**From:** Stan Jaksick <ssj3232@aol.com>  
**Sent:** Monday, December 11, 2017 4:12 PM  
**To:** jaksickjaksick@gmail.com  
**Subject:** skg dl & reg0040.pdf  
**Attach:** skg dl & reg0040.pdf, Untitled attachment 05494.txt

---

Please get it signed and notarized



WJ 011480  
TJA 001025

December 11, 2017

Stan Jaksick  
Wendy Jaksick

This letter is to confirm the agreement between Stan S. Jaksick and Wendy A. Jaksick. Stan has been loaning Wendy money since December 2016 that has not been accounted for in the trusts deductions of her 1995 Insurance Trust fund. Stan can no longer continue to loan Wendy his personal funds.

Stan currently has funds held in trust in the sum of \$400,000. Due to the current pending lawsuit, the money has not been distributed and the exact dollar amount of those funds due Wendy has not been determined. Therefore, Stan has agreed to pay Wendy \$6250.00 starting today December 11, 2017 and every month after until such funds have been determined to be distributable per the court. At such time, Wendy and Stan will deduct the money Stan has paid Wendy and pay her the remainder, as directed by the court.

Wendy believes Stan has always been honest in his business dealings and Wendy will not sue Stan personally for his roll as Co-trustee. They both agree that Todd is responsible for all the embezzlement, fraud, self dealings and illegal activity unbeknown to Stan. Stan has since objected to Todd's indemnification agreement, accounting and court filings and will continue to until the case is heard in court.

Stan understands and agrees that new trustees including Stan need to be appointed as soon as possible for both their best interest.

Wendy also agrees it is not necessary to include any of Stan's business interest (Montreux or Toiyabe) in any court proceedings and Wendy will keep her interest in Jaksick Family and Toiyabe Investments, LLC. Wendy also will not sue Stan regarding Lakeridge Golf or the Thelma Jaksick Estate business activities in the past.

Stan agrees to include Wendy in any future Sam Jaksick Trust activities that Todd has deliberately kept her from receiving.

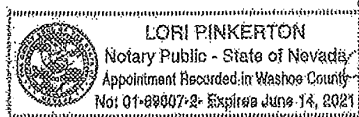
This agreement is legal and binding and confidential between the two parties upon their signatures notarized.

Stan S. Jaksick

12-11-17  
Date

State of Nevada  
County of Washoe

This instrument was acknowledged before me  
On 12-11-17 by Stanley S. Jaksick



Lori Pinkerton  
(signature of notary officer)

Wendy A. Jaksick

Date

State of \_\_\_\_\_  
County of \_\_\_\_\_

This instrument was acknowledged before me  
On \_\_\_\_\_ by \_\_\_\_\_

(signature of notary officer)

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yviloria

**EXHIBIT 7**

**EXHIBIT 7**

**From:** Wendy Jaksick <wjaksick10@gmail.com>  
**Sent:** Monday, January 29, 2018 1:26 PM  
**To:** Stan Jaksick <ssj3232@aol.com>  
**Subject:** Promise to pay Monthly SSJ and WJ  
**Attach:** IMG\_6135.JPG; Untitled attachment 11109.txt; IMG\_6136.JPG; Untitled attachment 11112.txt

---

Stan please both pages.

Wendy

I am sending out overnight as soon as I get my deposit from you today



W.I 011546  
TJA 001028

[illegible]

1977

THE UNIVERSITY OF CHICAGO PRESS



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800-762-2767  
www.hillcountrytexas.com

[illegible]



January 23, 2018

Stan,

Please deposit my February payment today into the Wells Fargo Account. In the future please pay me on the 25<sup>th</sup> of every month. My bills are on auto pay to be debited on the last day of the month.

Therefore on February 25<sup>th</sup> deposit for March

March 25<sup>th</sup> deposit for April and so on.

This will avoid any late charges or overdraft fees.

Thank you



Wendy Jaksick

Wendy Jaksick

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 8**

**EXHIBIT 8**

Big - Present - 445

Date: 03/11/2019

Detail Fee Transaction File List  
Robison, Sharp, Sullivan & Brust

Page: 1

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 1368.001 Jaksick/Todd									
1368.001	08/31/2016	1	A	9	400.00	2.10	840.00	Met with Todd Jaksick. Review indemnification agreement and correspondence. Conduct conflict check. Draft engagement letter. Open file.	ARCH
1368.001	09/15/2016	1	A	9	400.00	1.10	440.00	Conference with Brian McQuaid. Receive & review Trust and Amendments. Review Todd's creditor's claim. Telephone conference with Todd.	ARCH
1368.001	10/11/2016	1	A	9	400.00	0.90	360.00	Telephone conference with Todd Jaksick. Receive additional documents and review. Telephone conference with Brian McQuaid regarding replacing vacant Trustee position with Todd's nominee.	ARCH
1368.001	12/09/2016	1	A	9	400.00	1.30	520.00	Review documents in preparation for Todd's conference. Office conference with Todd Jaksick to review nature and method by which Todd appoints Successor Trustee. Review emails and correspondence between Wendy's counsel and Maupin, Cox and LeGoy.	ARCH
1368.001	12/13/2016	1	A	9	400.00	0.80	320.00	Telephone conference with Todd Jaksick regarding pending issues.	ARCH
1368.001	01/31/2017	1	A	9	400.00	2.80	1,120.00	Review in detail and with particularity all provisions of indemnification and contribution agreement in preparation for office conference with Todd. Office conference with Todd. Review schedules produced by client to be used as format for seeking reimbursement and cancellation of debt. Draft rough draft of letter for client to send to Trust Lawyers requesting reimbursement and cancellation of reflected debt.	ARCH
1368.001	02/14/2017	1	A	9	400.00	1.10	440.00	Continue to review documents in three ring binders provided by Todd. Receive, review Todd's response.	ARCH
1368.001	02/20/2017	1	A	9	400.00	1.10	440.00	Review correspondence and documents sent re: balance sheets and proposed letter. Work on revising letter.	ARCH
1368.001	04/28/2017	1	A	9	400.00	2.10	840.00	Prepare for meeting and met with Todd Jaksick to go over status of proceedings and consent from Trustee's to make payments on indemnification agreement.	ARCH
1368.001	06/30/2017	1	A	9	400.00	4.80	1,920.00	Prepare for meeting with Pierre Hascheff by reviewing prior correspondence from Dwiggins indemnification agreement and LeGoy correspondence. Review and analyze insurance policy (Pacific Life) option agreement, sale documents relating to Todd's purchase of Lake Tahoe house, 2013 tax return, operating agreement, and second amendment for Incline TSS Ltd. Review "wrap note" regarding TSS/SSJ LLC. Review SSJ LLC operating agreement and amendments. Review Riley email regarding distributions from Pioneer Group. Review Kimmel's appraisal. Review tax returns for Bright Holland and Golf Club operating agreements. Review debt issues with Jackrabbit LLC and review creditor list provided by Todd. Conference with Pierre Hascheff regarding Wendy's potential claims, issues of Sam's competence and mental vigor. Discuss with Pierre conflicts of interest and undue influence considerations. Receive, review Wendy's text and shared attitude and animosity with Pierre.	ARCH
1368.001	08/02/2017	1	A	9	400.00	3.20	1,280.00	Office conference with Todd Jaksick regarding decision to file petition for declaratory relief confirming validity, enforceability, and binding nature of indemnification agreement and related documents. Telephone conference with Brian McQuaid. Continue conference with Todd concerning Book Horn Ranch issues with Randy Venturaccl and Stan with respect to carve out, option agreements, and position to advance with Todd's discussion with Randy.	ARCH
1368.001	09/13/2017	1	A	9	400.00	1.20	480.00	Office conference. Prepare Todd for meeting with Stan regarding Stan's "wish list" viz a viz contemplated filing of petition to validate indemnification agreement.	ARCH
1368.001	09/19/2017	44	A	9	100.00	4.00	400.00	Review binder of deal documents	ARCH
1368.001	09/20/2017	1	A	9	400.00	1.10	440.00	Email traffic with Todd. Commence review and analysis of petition filed by Don Lattin and Brian McQuaid.	ARCH
1368.001	11/03/2017	1	A	9	400.00	1.20	480.00	Review petition and supporting exhibits in preparation for meeting with Todd Jaksick. Meeting with Todd Jaksick to discuss status. Telephone conference with Brian McQuaid concerning notice of appearance. Retrieve and review other petition in case....46. Read exhibits. Prepare notice of appearance. Letter to Todd.	ARCH
1368.001	11/15/2017	1	A	9	400.00	1.10	440.00	Working on setting up an appointment with Todd. Review Todd's emails regarding Jackrabbit capital call and need for lawyers to meet for workout.	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	11/16/2017	1	A	9	400.00	1.40	560.00	ARCH
							Conference with Todd to review all pending matters and petitions filed for accounting and ratification/approval of indemnification agreement. Review emails with Todd concerning problems. Telephone conference with Brian McQuaid with respect to future matters for pending petitions. Telephone conference with Don Lattin regarding whether jury trial should be requested in light of complexities involved versus Wendy's Erratic behavior. Filed notice of appearance. Start outline and draft of letter to all counsel to recommend amicable resolution and meeting among lawyers.	
1368.001	11/21/2017	1	A	9	400.00	1.10	440.00	ARCH
							Receive and review Todd's outline and timeline of events leading to disputes. Start draft of letters to co-counsel.	
1368.001	12/04/2017	1	A	9	400.00	3.50	1,400.00	ARCH
							Review emails concerning capital calls on Jack Rabbit and emails regarding disputes concerning administration of trust. Review Todd's timeline and outline of critical events. Prepare for a meeting with Todd. Draft proposed letter to Stan's counsel. Office conference with Todd Jaksick.	
1368.001	12/11/2017	44	A	9	250.00	1.00	250.00	ARCH
							review petition and objections	
1368.001	12/12/2017	49	A	9	120.00	3.25	390.00	ARCH
							Review client documents to prepare for meeting (.25), Meeting with client Todd Jaksick to discuss timeline, interworkings of the different trusts and parties involved (2), Research issue of undue influence for trustee, locate the Bethurem v, Herrera Perez case and the Aboud case. (1)	
1368.001	12/12/2017	1	A	9	400.00	3.20	1,280.00	ARCH
							Prepare for office conference by reviewing notebook and emails. Met and confer with Todd Jaksick (Jim & Lindsay). Diagram and discuss intricacies of all inter-connected transactions between various trusts and companies to prepare for meeting with lawyers on trust petition court matter and Capital Call on Jack Rabbit Ranch. Draft letter to counsel regarding Capital Call. Work with Therese on preparing response (without counterclaim offensives) to oppositions and objections filed to Trustee's petitions.	
1368.001	12/12/2017	19	A	9	110.00	4.00	440.00	ARCH
							Conference with Kent Robison to review case background (1.0). Attend conference with Kent Robison and client to review strategy and plan (1.5). Locate and prepare documents/information for Kent Robison (1.5).	
1368.001	12/13/2017	1	A	9	400.00	3.10	1,240.00	ARCH
							Telephone conference with Brian and Don. Work with Don on legitimacy of jury demand. Receive documents from Todd. Meet with Lindsay to review, organize, and index same. Review petitions, responses, and answers and objections to formulate appropriate response and pleading.	
1368.001	12/14/2017	44	A	9	250.00	1.00	250.00	ARCH
							Review petitions and outline tentative answer	
1368.001	12/15/2017	19	A	9	110.00	2.10	231.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.3). Begin work on time line from available documents/information (1.5).	
1368.001	12/18/2017	19	A	9	110.00	2.00	220.00	ARCH
							Review pleadings, motions, petitions filed for information and support of time line.	
1368.001	12/19/2017	19	A	9	110.00	0.30	33.00	ARCH
							Work on chart listing all involved trusts.	
1368.001	12/20/2017	19	A	9	110.00	0.50	55.00	ARCH
							Research, locate and print background information for potential forensic handwriting experts.	
1368.001	12/21/2017	1	A	9	400.00		-8,774.50	ARCH
							Transfer half of the fees from .001 (445) to .002 (446).	
1368.001	12/21/2017	1	A	9	400.00		5,927.75	ARCH
							Place 1/2 of prior payments made over to the 1368.002 matter.	
1368.001	12/28/2017	1	A	9	400.00	0.55	220.00	ARCH
							Review contents of new binders. Telephone conference with Todd. Worked on status conference statement for court.	
1368.001	01/02/2018	19	A	9	110.00	1.25	137.50	ARCH
							Continue with review of new binders of documents from client and create indexes (2.0). Update time line and entities charts with new information (.5).	
1368.001	01/03/2018	19	A	9	110.00	0.60	66.00	ARCH
							Continue with review of document binders from client and update time lines and entity charts.	
1368.001	01/04/2018	1	A	9	400.00	1.40	560.00	ARCH
							Prepare for and participate in case management conference in front of Judge Hardy. Participate in case conference with the Judge and counsel.	
1368.001	01/04/2018	19	A	9	110.00	0.25	27.50	ARCH
							Continue with review and indexing of client document binders.	
1368.001	01/05/2018	49	A	9	120.00	0.15	18.00	ARCH
							Meeting with Kent Robison, determine that we need to go through each pleading and petition to determine what each party is seeking.	
1368.001	01/08/2018	49	A	9	120.00	1.85	222.00	ARCH
							Draft Memo regarding the remedies sought by each party in cases -in the issue trust, the trustee want to	

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/09/2018	49	A	9	120.00	0.85	102.00	ARCH
1368.001	01/09/2018	19	A	9	110.00	0.30	33.00	ARCH
1368.001	01/10/2018	49	A	9	120.00	0.45	54.00	ARCH
							ratify and approve actions, and relief from liability. Wendy disputes the validity of the Second Amendment to the family trust because the Grantor did not execute it or the Grantor did not have the requisite mental capacity, or the Grantor executed it under undue influence. Stan wants more time to review the documents, but thinks he object to actions relating to the Lake Tahoe house.	
							Create research folder for trust issues, includes NRS 165.135, NRS 153.031, NRS 164.015, and Humane Soc of Carson City v. First National Bank of Nevada.	
							Locate and contact potential handwriting experts.	
							Meeting with Kent Robison to discuss need for a Motion for More Definite Statement in both the -445 case and the -446 case because it is unclear what Stan objects to based on the objection that he filed. Motion will be drafted pending the outcome of a letter to Stan's attorney requesting that he file a more clear amended objection.	
1368.001	01/10/2018	44	A	9	250.00	0.60	150.00	ARCH
1368.001	01/10/2018	19	A	9	110.00	2.90	319.00	ARCH
							445 ISSUE TRUST - meeting with client	
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (1.0). Attend conference with Kent Robison, Therese Shanks, Lindsay Liddell, to review strategy (1.0). Continue with expert handwriting (.3). Prepare and send documents/information to Don Lattin (.3).	
1368.001	01/11/2018	1	A	9	400.00	1.45	580.00	ARCH
							Prepared for meeting with Todd, Jim, Therese and Lindsay. Office conference. Worked on letter to Stan's counsel. Telephone conference with Lattin.	
1368.001	01/11/2018	49	A	9	120.00	1.00	120.00	ARCH
							Meeting with Todd Jaksick to go over the different petitions and objections with each of the trusts.	
1368.001	01/11/2018	19	A	9	110.00	1.20	132.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Prepare for and attend meeting with client, Kent Robison, Therese Shanks and Lindsay Liddell (1.3). Work on index of TSS Incline transaction by review of document binder from client (.8).	
1368.001	01/12/2018	19	A	9	110.00	0.65	71.50	ARCH
							Review, index and organize documents from client pursuant to Kent Robison instructions (1.3).	
1368.001	01/17/2018	19	A	9	110.00	0.50	55.00	ARCH
1368.001	01/18/2018	19	A	9	110.00	1.30	143.00	ARCH
							Work on index/time line of Incline TSS events.	
							Review and revise TSS time line/index (.5). Organize and prepare documents/information supporting time line (.8).	
1368.001	01/19/2018	19	A	9	110.00	0.80	88.00	ARCH
							Review and revise Incline TSS time line/index (.3). Begin life insurance index/time line (.5).	
1368.001	01/22/2018	19	A	9	110.00	0.30	33.00	ARCH
							Work on document indexes/time lines for Incline and life insurance.	
1368.001	01/23/2018	1	A	9	400.00	0.20	80.00	ARCH
							Telephone conference with Don Lattin regarding unified defense and proposed scheduling order.	
1368.001	01/24/2018	1	A	9	400.00	0.70	280.00	ARCH
							Emails to and from Mark Connot and Don Lattin regarding sufficiency of pre-trial order (.4). Continue to review Wendy's accusations (.8). Schedule meeting with Todd (.2).	
1368.001	01/24/2018	49	A	9	120.00	0.30	36.00	ARCH
							Review Wendy's counter-petition to understand the claims therein, which include breach of the trustee's fiduciary duty and request to remove trustee	
1368.001	01/24/2018	49	A	9	120.00	0.70	84.00	ARCH
							Research and obtain all cases and statutes that Wendy cites to as basis in her Counter-Petition including: Zastrow v Journal Communications Inc, Wells Fargo Bank v Superior Court, Taylor v Nationsbank Corp, Sierra v Williamson, BANK OF AMERICA NA a national association Plaintiff v Matthew LONG an individual, Bank of Nevada v Speirs, Barmettler v Reno Air Inc, Blue Chip Emerald v Allied Partners, NRS 30.030, NRS 30.040, NRS 153.031, NRS 156.070, NRS 163.100, NRS 163.110, NRS 163.115, NRS 164.005, NRS 164.015	
1368.001	01/24/2018	19	A	9	110.00	1.25	137.50	ARCH
							Review new binders of documents from client (1.5). Work on updating time line with new information (.5). Insert/update chart of Jaksick entities/trust (.5).	
1368.001	01/25/2018	1	A	9	400.00	1.70	680.00	ARCH
							445 - Continue review of documents and consolidated petition filed by Wendy. Telephone conference with Connot regarding extension of time. Continue to review pertinent documents raised in joint petition. Comprehensive status conference with client to go over Wendy's joint claims. Telephone conference with Don Lattin (3). Research possibilities of filing motion for summary judgment or motion to dismiss on statute of limitations.	
1368.001	01/25/2018	44	A	9	250.00	1.50	375.00	ARCH
							445 ISSUE TRUST - Review counterpetition (0.75); meeting with client (0.75)	

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/26/2018	1	A	9	400.00	2.30	920.00	ARCH
							Receive and review in detail the amended objection and opposition filed by Stan regarding the subject Trusts (1.1). Analyze and evaluate applicable statutes of limitation for each claim for relief (1.3). Review, analyze, and evaluate impact of exhibits attached to Stan's objection/opposition to be consider for support on motion to dismiss and/or motions for summary judgment (2.2).	
1368.001	01/26/2018	19	A	9	110.00	0.50	55.00	ARCH
							(01/24/18) Update/revise life insurance and Incline TSS time lines/indexes.	
1368.001	01/26/2018	19	A	9	110.00	1.00	110.00	ARCH
							(01/25/18) Conference with Kent Robison to review status (.2). Locate and print docket and various pleadings from Sam Probate (.5). Contact and telephone conference with forensic handwriting expert (.3).	
1368.001	01/26/2018	19	A	9	110.00	0.30	33.00	ARCH
							Multiple emails and telephone conferences with potential expert Songer to arrange conference with Kent Robison.	
1368.001	01/29/2018	44	A	9	250.00	1.50	375.00	ARCH
							review petitions and research re no contest clause challenges	
1368.001	01/30/2018	44	A	9	250.00	2.50	625.00	ARCH
							Begin draft motion to dismiss	
1368.001	01/31/2018	44	A	9	250.00	0.50	125.00	ARCH
							Review re motion to dismiss for no contest (0.3); draft joint defense agreement (0.2)	
1368.001	01/31/2018	19	A	9	110.00	1.00	110.00	ARCH
							Prepare for and attend telephone conference with Kent Robison and Songer (handwriting expert) (.5). Prepare and send documents/information to client (.3). Confirm retention of Dr. Plasecki as expert (.2).	
1368.001	02/01/2018	1	A	9	400.00	2.10	840.00	ARCH
							Telephone conference with Mark Songer (handwriting expert) to discuss case and nature of questioned and unquestioned documents (.3). Start working on assembling necessary information for Songer and processing engagement letter (.9). Telephone conference with Dr. Plasecki regarding competency issues and need to confirm process and method by which competency can be ascertained without other medical evidence (.9).	
1368.001	02/01/2018	44	A	9	250.00	0.25	62.50	ARCH
							Call with counsel for Trusts	
1368.001	02/01/2018	19	A	9	110.00	0.60	66.00	ARCH
							Review and respond to emails from Dr. Plasecki (expert) (.2). Locate and prepare documents/information for Kent Robison telephone conference with expert Mark Songer (.4).	
1368.001	02/05/2018	1	A	9	400.00	1.90	760.00	ARCH
							Review Don Lattin's motion to dismiss. Compare arguments to Trust document and contents of petition (.9). Telephone conference with Todd (.2). Work with Therese on draft of supplement to motion to dismiss and joinder (.8).	
1368.001	02/05/2018	44	A	9	250.00	0.30	75.00	ARCH
							Review motion to dismiss	
1368.001	02/05/2018	19	A	9	110.00	0.20	22.00	ARCH
							Arrange appointment with Kent Robison and expert Dr. Plasecki.	
1368.001	02/06/2018	44	A	9	250.00	0.20	50.00	ARCH
							Review filed motion to dismiss	
1368.001	02/07/2018	19	A	9	110.00	1.30	143.00	ARCH
							Review and respond to Mark Songer (expert) emails (.2). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend conference with expert Dr. Plasecki (.8).	
1368.001	02/08/2018	44	A	9	250.00	2.00	500.00	ARCH
							Draft joinder (0.2); edit draft motion to dismiss to be a supplement to joinder (1); continue drafting supplement (1)	
1368.001	02/09/2018	1	A	9	400.00	0.85	340.00	ARCH
							Review Don's motion to dismiss (.9). Work with Therese regarding Todd's motion to dismiss (.8).	
1368.001	02/09/2018	19	A	9	110.00	0.80	88.00	ARCH
							Conference with Kent Robison to review status (.2). Prepare draft retention letter to Dr. Plasecki (.3). Locate alternative handwriting expert (.3).	
1368.001	02/12/2018	44	A	9	250.00	3.00	750.00	ARCH
							Draft supplement to joinder to motion to dismiss	
1368.001	02/13/2018	44	A	9	250.00	1.00	250.00	ARCH
							Meeting with client	
1368.001	02/13/2018	19	A	9	110.00	2.00	220.00	ARCH
							Conference with Kent Robison to review case status (.3). Work on/update TSS Incline, life insurance and general time lines (.7). Locate and prepare documents/information/exhibits for motion (1.0).	
1368.001	02/14/2018	1	A	9	400.00	1.75	700.00	ARCH
							Extensive interview with and conference with Todd Jaksick. Review Wendy's amended objections. Review Todd's binders, so that an appropriate designation could be made under NRCP 16.1. Review prenup issues with regarding to legitimacy and authenticity of required transfers. Review Stan's initial disclosures to determine what if any documents assist with motions on statutes of limitations and what if any documents augment the motion to dismiss on the no contest clause.	
1368.001	02/14/2018	49	A	9	120.00	0.20	24.00	ARCH
							Meet with Kent Robison to prepare for his client meeting with Todd and call potential handwriting expert	

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Client ID 1368.001 Jaksick/Todd								
1368.001	02/14/2018	19	A	9	110.00	3.30	363.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Research and contact handwriting experts (.3). Prepare for and attend conference with clients, Kent Robison and Therese Shanks (1.5). Prepare documents/information for initial disclosures (1.0).	
1368.001	02/15/2018	19	A	9	110.00	2.00	220.00	ARCH
							Work on draft initial disclosures (.5). Conference with Kent Robison to review and revise disclosures (.5). Begin review of documents to be produced (1.0).	
1368.001	02/15/2018	1	A	9	400.00	0.90	360.00	ARCH
							Telephone conference with Todd Jaksick. Review list of documents to be provided. Culled various documents from production that might be argued as work product or attorney/client privilege. Review Todd's list of additional things to be done.	
1368.001	02/16/2018	44	A	9	250.00	0.25	62.50	ARCH
1368.001	02/16/2018	19	A	9	110.00	2.60	286.00	ARCH
							Client meeting Review Initial disclosures from Lattin (.3). Prepare for and attend strategy and status conference with Kent Robison and Therese Shanks (1.5). Work on detailed index of Jardon documents (.8).	
1368.001	02/16/2018	1	A	9	400.00	0.60	240.00	ARCH
1368.001	02/20/2018	44	A	9	250.00	0.40	100.00	ARCH
1368.001	02/20/2018	19	A	9	110.00	1.60	176.00	ARCH
							Continue with index of documents produced with our initial disclosures (1.3). Emails to and from handwriting expert (.3).	
1368.001	02/21/2018	19	A	9	110.00	0.50	55.00	ARCH
							Prepare client documents/initial disclosures for binders (.2). Review Stan's initial disclosures (.3).	
1368.001	02/22/2018	19	A	9	110.00	0.60	66.00	ARCH
							Work on detailed index of initial disclosures (.3). Locate new potential handwriting experts (.3).	
1368.001	02/23/2018	19	A	9	110.00	0.60	66.00	ARCH
							Update/revise time lines (.3). Locate and contact new handwriting experts (.3).	
1368.001	02/26/2018	19	A	9	110.00	1.60	176.00	ARCH
1368.001	02/27/2018	1	A	9	400.00	2.25	900.00	ARCH
							Review binder of emails from client (2,000 pages). Review Stan Jaksick's objection to determine whether clarification is needed by way of motion for more definite statement (.3). Review Stan's initial disclosures to determine whether a "challenge" can be discerned (.4). Discuss motion to dismiss with Don Lattin and review need to file answer to Stan's objection/position in light of him not providing an amendment (.4). Office conference with Todd to review production of documents, pending claims, ascertains and allegations and response to Wendy's objection/opposition to motion to dismiss (3.4).	
1368.001	02/27/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.3). Attend conference with Kent Robison, Therese Shanks and client (1.2). Continue with review of client emails (.5).	
1368.001	02/27/2018	44	A	9	250.00	1.25	312.50	ARCH
1368.001	02/28/2018	1	A	9	400.00	2.90	1,160.00	ARCH
							Meeting with client Work on letters to heirs and beneficiaries. Work on spoliation letter to Wendy, together with visitation schedule (.9). Telephone conference with Don Lattin regarding conference to determine whether motion to dismiss is mute (.3). Work on revising draft of status conference statement (.4). Began review, outline, and analysis of Wendy's first amended counter-petition to sur charge trustees for breach of fiduciary duties for removal of trustees and for appointment of independent trustees and for declaratory judgment/other relief (1.3).	
1368.001	02/28/2018	19	A	9	110.00	2.10	231.00	ARCH
							Conference with Kent Robison to prepare chart of pleadings/motions filed (1.0). Work on detailed index of our document production (.5). REview latest filing by Wendy (.3). Locate and prepare documents/information for Kent Robison (3).	
1368.001	02/28/2018	44	A	9	250.00	1.30	325.00	ARCH
							draft letter to all counsel re same (0.3); review new amended petition by Wendy (1);	
1368.001	03/01/2018	19	A	9	110.00	2.50	275.00	ARCH
							Work on revision of detailed document index of our disclosures (1.5). Locate additional information on handwriting experts (.5). Work on chart of all pleadings/motions filed (.5).	
1368.001	03/02/2018	1	A	9	400.00	0.30	120.00	ARCH
							Continue to review and outline distinctions between MCL's responsibility and our responsibility under Wendy's first amended counter-petition.	
1368.001	03/02/2018	19	A	9	110.00	1.00	110.00	ARCH
							Conference with Kent Robison to review status and assignments (.2). Work on additions to chronological index (.5). Compare document production with Lattin disclosure (.3).	
1368.001	03/05/2018	1	A	9	400.00	1.10	440.00	ARCH
							Telephone conference with Todd. Work on letter to beneficiaries to SSJ Trust. Review and advise on letter to Wendy regarding visitation to Lake Tahoe house. Work on status conference statement.	



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Client ID 1368.001 Jaksick/Todd								
1368.001	03/05/2018	19	A	9	110.00	0.90	99.00	ARCH
							Conference with Kent Robison to review status (.3). Assist with documents/information for Kent Robison to prepare letters to Palmer/Wendy (.3). Work on revised file set-up (.3).	
1368.001	03/06/2018	1	A	9	400.00	2.05	820.00	ARCH
							Work on reply to Wendy's opposition to motion to dismiss (.6). Outline, analyze, and put on spreadsheet Wendy's causes of actions, transactions questioned, named defendants, pending motions, and list of pleadings (1.1). Meeting with Don Lattin and Carolyn Renner to discuss status conference strategies and how to deal with supplemental and amended	
1368.001	03/06/2018	19	A	9	110.00	2.90	319.00	ARCH
							"objections and responses" to motions to dismiss (2.4). Conference with Kent Robison to review assignments (.3). Work on chronological document index (.5). Locate and prepare documents/information for Kent Robison (.8). Prepare for and attend conference with Kent Robison, Therese Shanks, Lattin regarding preparation for hearing and case strategy (1.0). Prepare and send documents to expert (.3).	
1368.001	03/06/2018	44	A	9	250.00	1.90	475.00	ARCH
							Meeting re status conference (1.5); begin draft reply (0.4)	
1368.001	03/07/2018	1	A	9	400.00	1.05	420.00	ARCH
							Review transcript of previous status conference (.3). Confer with Don Lattin to obtain extensions of time in which to respond to Trustee's petitions in both cases (.3). Appear at and participate in status conference with Judge Hardy (1.1). Pre and post hearing strategy sessions with Todd Jaksick to review additional documents produced to refute Wendy's accusations (.4).	
1368.001	03/07/2018	19	A	9	110.00	1.80	198.00	ARCH
							Conferene with Kent Robison to review status and assignments (.2). Attend conference with Kent Robison and client (.8). Review new documents/information from client (.5). Begin index of documents to expert (.3).	
1368.001	03/07/2018	44	A	9	250.00	3.25	812.50	ARCH
1368.001	03/09/2018	1	A	9	400.00	0.70	280.00	ARCH
							Draft reply ISO motion to dismiss	
							Work on rough draft of interrogatories responsive to Wendy's amended counter-petition against Todd (.9). Research need to file responses to objections and oppositions (.3). Made rough draft of potential counter-petition against Stan should he make individual accusations against Todd on either Trust (.2).	
1368.001	03/09/2018	19	A	9	110.00	0.30	33.00	ARCH
							Locate and prepare documents/information for Kent Robison.	
1368.001	03/12/2018	1	A	9	400.00	2.10	840.00	ARCH
							Office conference with Todd Jaksick to review strategy for defending accusations concerning Lake Tahoe house. Work on organizing exhibits in chronological fashion that support all of Todd's defenses and outline the details of ownership and transactions relative to the Lake Tahoe House (3.3). Work on draft of request for production of documents and interrogatories regarding accusations and allegations in Wendy's amended counter-petition (.9).	
1368.001	03/12/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review assignments (.3). Prepare for and attend conferene with Kent Robison, Therese Shanks and client (1.5). Assist with documents/information/exhibits for time line (.5).	
1368.001	03/12/2018	49	A	9	120.00	0.10	12.00	ARCH
							Meet with Kent Robison and discuss the discovery requests needed based off of Wendy's filings (split time with family trust)	
1368.001	03/12/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.001	03/13/2018	1	A	9	400.00	1.70	680.00	ARCH
							Meeting with client	
							Receive, analyze, evaluate and review Wendy Jaksick's initial disclosures (.4). Email to Connot regarding deficiencies in disclosure (.2). Respond to Connot's statement that documents do not have to be produced with draft of Todd's first request for production of documents, seeking production of all documents identified by Wendy in initial disclosures (.6). Work on second set of request for production of documents regarding responsive pleadings in issue trust, oppositions, objections, and answers (.3). Work on third set of RFP's regarding allegations and accusations in objection opposition and answer to petition in family trust matter (.3). Draft fourth set of request for production of documents addressing request to accusations in Wendy's amended counter-petition (1.6).	
1368.001	03/13/2018	1	A	9	400.00	0.40	160.00	ARCH
							Telephone conference with Todd regarding status and procedures with respect to document production and email search (.4). Telephone conference with Jeff Warner and process emails regarding Jeff's ability to obtain relevant and appropriate emails (.4).	

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Client ID 1368.001 Jaksick/Todd								
1368.001	03/13/2018	19	A	9	110.00	1.30	143.00	ARCH
							Conference with Kent Robison to review assignment (.3). Review Wendy disclosures (.5). Review documents/information from client to see if any documents from Wendy were in our binders (.5).	
1368.001	03/13/2018	49	A	9	120.00	0.80	96.00	ARCH
							.4 Review Wendy's Opposition, Objection, and Answer in the Issue Trust;	
							.4 Draft a second set of Requests for Production for the issue trust	
1368.001	03/13/2018	49	A	9	120.00	1.00	120.00	ARCH
							Analyze Wendy's Amended CounterPetition to pull out her allegations for a new set of Requests for Production (Time split with Family Trust)	
1368.001	03/13/2018	49	A	9	120.00	1.00	120.00	ARCH
							Draft Requests for Production set regarding Wendy's Amended CounterPetition (Time split with Family Trust)	
1368.001	03/13/2018	49	A	9	120.00	0.30	36.00	ARCH
							Meet with Kent Robison regarding the Requests for Production; discuss the definitions to include in the requests (Time split with Family Trust)	
1368.001	03/14/2018	19	A	9	110.00	1.30	143.00	ARCH
							Update/revise detailed document indexes (.5). Review new documents from client (.8).	
1368.001	03/14/2018	49	A	9	120.00	0.20	24.00	ARCH
							Draft an Request for Production for Wendy's objections	
1368.001	03/14/2018	49	A	9	120.00	0.50	60.00	ARCH
							Draft and revise the Fourth Request for Production based on Wendy's Amended Counterclaim to include Kent Robison's comments from the 3/13 meeting (Time split with Family Trust)	
1368.001	03/14/2018	49	A	9	120.00	0.10	12.00	ARCH
							Perform a final revision to the requests for production and send to Latin for his records (Time split with Family Trust)	
1368.001	03/14/2018	44	A	9	250.00	1.50	375.00	ARCH
							Meeting with client	
1368.001	03/16/2018	1	A	9	400.00	1.50	600.00	ARCH
							(60%) Work on second, third, fourth, and fifth request for production of documents (1.7). Telephone conference with consultant (.3). Telephone conference with Todd regarding there is issues raised in pleadings and in opposition to motion to dismiss (.5).	
1368.001	03/16/2018	49	A	9	120.00	0.20	24.00	ARCH
							Meeting with Kent Robison to review clients edits to Requests for Production and what to implement from client edits; discuss potential for a 5th request for production to Wendy based on the Opposition to Motion to Dismiss (time split with family trust)	
1368.001	03/17/2018	49	A	9	120.00	1.00	120.00	ARCH
							.5 Edit the Requests for Production using client and Kent Robison edits;	
							.5 Analyze Wendy's Opposition to Motion to Dismiss and make list of topics not previously covered by other requests for a potential 5th request for production (Time split with Family Trust)	
1368.001	03/19/2018	1	A	9	400.00	1.60	640.00	ARCH
							Telephone conference with all counsel, except Hosmer-Henner regarding need for confidentiality order (.2). Review suggested changes by Connot (.1). Incorporate changes. Review need for confidentiality order with client (.2). Office conference with Todd Jaksick regarding additional requests for production of documents (.4). Continue office conference with Todd Jaksick concerning need for additional documents from Nik Palmer (.3). Continue conference with Todd Jaksick to review list of documents identified by Connot and initial disclosures (.3). Continue office conference with client organizing Lake Tahoe documents chronologically for clearer depiction of evolution of title (.8). Telephone conference with Becky Rich at Ticor to request Grantee/Grantor index and escrow documents, title documents regarding transfers of title to Lake Tahoe house (.9).	
1368.001	03/19/2018	19	A	9	110.00	1.20	132.00	ARCH
							Prepare for and attend status and strategy conference with Kent Robison, Therese Shanks and client.	
1368.001	03/19/2018	44	A	9	250.00	1.00	250.00	ARCH
							Client meeting	
1368.001	03/20/2018	19	A	9	110.00	0.50	55.00	ARCH
							Locate and print documents/information/exhibits for Tahoe time line (.5).	
1368.001	03/21/2018	1	A	9	400.00	2.52	1,008.00	ARCH
							(60%) Office conference with Todd Jaksick to continue review of documents to be produced (1.3). Office conference with Jeff Warner to review word search protocol for Todd's emails and determination of programs and servers used to preserve email traffic (1.1). Continue to discuss and negotiate retention of consultant and further discuss documents needed by consultant for analysis of factual issues pertaining to case, included competence (1.8).	
1368.001	03/21/2018	19	A	9	110.00	0.80	88.00	ARCH
							Locate and prepare information on new handwriting experts (.3). Attend telephone conference with Kent Robison and exert (.5).	
1368.001	03/21/2018	49	A	9	120.00	0.20	24.00	ARCH
							Meeting with Kent Robison to discuss potential requests for production when Stan files his Counter petition; discuss preparations for Interrogatories to send	

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Client ID 1368.001 Jaksick/Todd								
1368.001	03/22/2018	19	A	9	110.00	0.80	88.00 Research and print Stan divorce docket (.3). Begin organization and index of TSS/Tahoe documents (.5).	ARCH
1368.001	03/23/2018	44	A	9	250.00	0.60	150.00 Email Brian Kelly re file (0.2); review re indemnification agreements (0.4)	ARCH
1368.001	03/26/2018	1	A	9	400.00	0.78	312.00 (60%) Evaluated Stan's objection/counter Petition (.7). Start draft of RFPs to specific accusations (.6).	ARCH
1368.001	03/26/2018	44	A	9	250.00	1.50	375.00 Review Stan objection and counterpetition (1); research re deceptive trade practices applying to trust administration matters (0.5)	ARCH
1368.001	03/26/2018	19	A	9	110.00	1.30	143.00 Review and index TSS documents (.5). Review client's tie line and incorporate into ours (.5). Review Wendy disclosures (.3).	ARCH
1368.001	03/27/2018	49	A	9	120.00	0.30	36.00 Create document for interrogatories to send to Wendy and begin drafting interrogatories. (time split between trusts)	ARCH
1368.001	03/27/2018	19	A	9	110.00	2.10	231.00 Access documents from Wendy, disclosures and begin index and comparison (1.8). Telephone conference with Kent Robison to review status (.3).	ARCH
1368.001	03/28/2018	49	A	9	120.00	1.10	132.00 Analyze Stan's objection and amended petition regarding the issue trust to prepare to draft discovery requests.	ARCH
1368.001	03/28/2018	44	A	9	250.00	0.50	125.00 Begin draft answer to Wendy's counterpetition	ARCH
1368.001	03/28/2018	19	A	9	110.00	1.80	198.00 Continue with review of Wendy and Stan disclosures, indexing and comparison to our document disclosures (1.0). Work on indexing/organization of Trust document production (.8).	ARCH
1368.001	03/29/2018	19	A	9	110.00	1.80	198.00 Review, index and reconcile Trust document disclosures with our disclosures (1.0). Review, organize and compare documents from client to documents produced by Wendy and Stan (.8).	ARCH
1368.001	03/29/2018	1	A	9	400.00	0.80	320.00 Draft more (5) interrogatories to be sent to Wendy on issues involving Incline House.	ARCH
1368.001	03/30/2018	49	A	9	120.00	0.90	108.00 draft request for production regarding stan's amended objection and counter petition in the issue trust.	ARCH
1368.001	03/30/2018	19	A	9	110.00	1.00	110.00 Update/revise index of Petitioner's disclosures (1.0).	ARCH
1368.001	04/02/2018	1	A	9	400.00	1.54	616.00 (70%) Continue work on Request For Production of documents to Stan Jaksick regarding Issue Trust (1.1) (70%) Draft more interrogatories and proof read and changed in order to include more specificity (1.1)	ARCH
1368.001	04/02/2018	49	A	9	120.00	0.40	48.00 Finalize both requests for production regarding Stan. Time is split between both trusts.	ARCH
1368.001	04/02/2018	49	A	9	120.00	1.10	132.00 Phone call with Kent Robison regarding interrogatories to Wendy. (.2) Draft interrogatories for Wendy. (.9) (Time is split between trusts)	ARCH
1368.001	04/02/2018	44	A	9	250.00	4.00	1,000.00 Outline motion to dismiss (1); draft facts section (3)	ARCH
1368.001	04/03/2018	1	A	9	400.00	0.60	240.00 Telephone conference with Don to work on motion to dismiss and allocate duties.	ARCH
1368.001	04/03/2018	1	A	9	400.00	0.70	280.00 Work on studying Stan's petition and exhibits.	ARCH
1368.001	04/03/2018	44	A	9	250.00	5.00	1,250.00 Draft argument (2); draft intro and conclusion and standard of review for motion to dismiss (2); edit (1)	ARCH
1368.001	04/03/2018	19	A	9	110.00	0.30	33.00 Locate, prepare and send documents/information to Kent Robison.	ARCH
1368.001	04/04/2018	1	A	9	400.00	0.55	220.00 Conference with Todd. Work on underlying conflict issues. Continued work on discovery requests on both.	ARCH
1368.001	04/04/2018	44	A	9	250.00	1.00	250.00 Draft answer to Wendy Counterpetition	ARCH
1368.001	04/05/2018	1	A	9	400.00	1.10	440.00 Interrogatories and RFPs to Stan.	ARCH
1368.001	04/05/2018	49	A	9	120.00	0.30	36.00 Teleconference with Kent Robison to go over discovery requests including joint request with Don Lattin to Stan and Wendy, and how those should be formatted. (Time split between trusts)	ARCH
1368.001	04/05/2018	49	A	9	120.00	0.90	108.00 Draft request for production to Stan regarding both the issue trust in the family trust. (Time split between trusts)	ARCH
1368.001	04/05/2018	44	A	9	250.00	0.25	62.50 Call with client	ARCH
1368.001	04/06/2018	49	A	9	120.00	0.20	24.00 Implement Kent Robison's edits and suggestions into the First Set of Interrogatories to Wendy. (Time split between both trusts)	ARCH
1368.001	04/06/2018	44	A	9	250.00	0.60	150.00 Meet with client	ARCH
1368.001	04/08/2018	1	A	9	400.00	1.20	480.00 Work on objections and answer to Wendy's counter petition to include affirmative defenses, mitigation, third party causation, Wendy's breach of good faith, spoliation, comparative negligence, breach of duties, justifiable reliance, fraud as an affirmative defense, co-trustee's can't co-conspire similar to employees of corporation and reasonable reliance of counsel (1.5). Conduct research of elements concerning each new affirmative defense added to answer (.9).	ARCH
1368.001	04/09/2018	1	A	9	400.00	0.80	320.00 Review, corrected, and added to motion to dismiss regarding family (.2). Review applicability of exhibits to motion to dismiss on issue trust (.2). Telephone	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	04/09/2018	49	A	9	120.00	0.20	24.00	ARCH
1368.001	04/09/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	04/09/2018	19	A	9	110.00	1.50	165.00	ARCH
1368.001	04/10/2018	49	A	9	120.00	0.50	60.00	ARCH
1368.001	04/10/2018	19	A	9	110.00	0.80	88.00	ARCH
1368.001	04/16/2018	19	A	9	110.00	2.10	231.00	ARCH
1368.001	04/17/2018	49	A	9	120.00	0.30	36.00	ARCH
1368.001	04/17/2018	49	A	9	120.00	0.40	48.00	ARCH
1368.001	04/17/2018	19	A	9	110.00	2.30	253.00	ARCH
1368.001	04/18/2018	49	A	9	120.00	0.70	84.00	ARCH
1368.001	04/18/2018	19	A	9	110.00	2.40	264.00	ARCH
1368.001	04/19/2018	49	A	9	120.00	1.40	168.00	ARCH
1368.001	04/19/2018	1	A	9	400.00	0.50	200.00	ARCH
1368.001	04/19/2018	1	A	9	400.00	0.90	360.00	ARCH
1368.001	04/19/2018	19	A	9	110.00	1.00	110.00	ARCH
1368.001	04/20/2018	49	A	9	120.00	0.90	108.00	ARCH
1368.001	04/20/2018	1	A	9	400.00	1.85	740.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	04/20/2018	19	A	9	110.00	1.00	110.00	ARCH
							Manager (.8). Conference with Kent Robison to review status and assignments (.2). Locate, prepare and send documents/information to client (.3). Work on potential documents to be produced (.5).	
1368.001	04/23/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review assignments (.3). Update document binders and indexes (.8). Organize documents fro Trust (1.5 K pages) (1.0). Begin location and preparation of potential Wendy deposition exhibits (.5).	
1368.001	04/24/2018	44	A	9	250.00	3.50	875.00	ARCH
							Client meeting (1); review stan opposition to motion to dismiss (0.5); outline potential argument (0.25); legislative history research re NRS 41.600 and NRS Chapter 598 (1.25); draft status conference statement (0.5)	
1368.001	04/24/2018	1	A	9	400.00	1.60	640.00	ARCH
							Continue to work on statutory demand letters under and pursuant to NRS 78.257 and NRS 86.241(6). Office conference with Jessica and Todd regarding formation, operation development and respective holdings of Jaksick Family Trust LLC, Montreux Development Group LLC, Montreux Golf Club Ltd., Lakeridge Golf Course Ltd., Montreux Golf Club Holding Company LLC, and Toiyabe Investment Company. Work on redraft of request for production of documents regarding those companies and documents needed in discovery. Made modifications to Limited Power of Attorney and to affidavit required by NRS 78.257(3). Work on flow chart for Todd and Jessica concerning accusations made by Wendy and Stan on Issue Trust and Stan on Family Trust for clients' ability to organize documents and defenses accordingly.	
1368.001	04/24/2018	19	A	9	110.00	2.30	253.00	ARCH
							Review and organize 1.5K pages of Trust documents for binders (1.0). Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison for client meeting (.3). Review Wendy supplemental document disclosure and compare to prior discovery (.8).	
1368.001	04/25/2018	44	A	9	250.00	0.75	187.50	ARCH
1368.001	04/25/2018	19	A	9	110.00	2.00	220.00	ARCH
							Finish legislative history research Conference with Kent Robison to review status and assignments (.2). Continue with review and organization of Trust documents (1.0). Locate and copy potential documents/information/exhibits for Wendy deposition (.8).	
1368.001	04/25/2018	1	A	9	400.00	2.20	880.00	ARCH
							Work on statutory demand letters to make document request more specific (.2). Redraft and correct Todd's Limited Power of Attorney in support of document request (.9). Revise Todd's affidavit of good faith to comply with Chapter 78 (.4). Draft request for production of documents requesting documents subject of the letter demands (1.1). Office conference with Todd Jaksick to prepare for status conference (.4). Debrief with Don Lattin, Todd Jaksick, and Therese regarding attorney/client privilege with regard to emails Stan sent to Wendy (1.4).	
1368.001	04/26/2018	1	A	9	400.00	3.30	1,320.00	ARCH
							(60%) Statement for court (.6). Record demand letter revised and finalized (.8). Prepared for hearing (.5). RFPs drafted for companies controlled by Stanley (.9). Flow chart for Wendy's claims prepared for client (.7). Conference with Don regarding privilege issues (1.1). Work on motion to terminate Stan's position as trustee (.9).	
1368.001	04/26/2018	19	A	9	110.00	2.90	319.00	ARCH
							Locate, copy and prepare documents/information/exhibits for Wendy deposition (1.0). Assist with documents/information for charts for clients regarding claims and damages (1.0). Locate and prepare documents/information for Kent Robison and Therese Shanks (.3). Attend conference with Kent Robison and Therese Shanks (.3). Locate and prepare documents/information for hearing (.3).	
1368.001	04/26/2018	15	A	9	50.00	0.25	12.50	ARCH
1368.001	04/26/2018	44	A	9	250.00	2.25	562.50	ARCH
							Draft Notice of Deposition of Michael Kimmell. Outline reply (1.5); prepare for and attend status conference (0.5); meeting with client (0.25)	
1368.001	04/27/2018	19	A	9	110.00	1.30	143.00	ARCH
							Conference with Kent Robison to review Status (.3). Organize and review documents from client for possible production (1.0).	
1368.001	04/30/2018	19	A	9	110.00	1.30	143.00	ARCH
							Continue with index and organization of client documents for possible production (.8). Begin review of Wendy discovery responses and documents (.5).	
1368.001	04/30/2018	44	A	9	250.00	5.20	1,300.00	ARCH
							Draft reply (4); research re beneficiary ownership rights (1); edit (0.2)	

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1368.001	05/01/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Continue with review of Wendy document production (1.0). Transfer Wendy documents to system (.3). Prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.001	05/01/2018	15	A	9	50.00	0.25	12.50	ARCH
							Draft Request for Submission of Motion to Dismiss Fraud Claims.	
1368.001	05/02/2018	19	A	9	110.00	2.90	319.00	ARCH
							Conference with Kent Robison to review case status and assignments (.3). Continue with review and assembly of client emails for production (1.3). Continue with review of Wendy documents (12,000 pages) (1.3).	
1368.001	05/03/2018	1	A	9	400.00	0.60	240.00	ARCH
							Receive and continue to review documents produced by Wendy. Review documents sent by Don Lattin evidencing collusion between Wendy and Stan. Research implications of Stan's conduct against Todd while Todd still serving as Trust to Stan as a beneficiary in the Issue Trust.	
1368.001	05/03/2018	19	A	9	110.00	1.50	165.00	ARCH
							Continue with review and organization of documents from Wendy discovery responses (12,000 pages) (1.5).	
1368.001	05/03/2018	15	A	9	50.00	1.00	50.00	ARCH
							Draft Notices of NRCP 30(b)(6) for Jaksick entities (6).	
1368.001	05/04/2018	1	A	9	400.00	2.10	840.00	ARCH
							Continued review of documents provided by Wendy showing collusion between Stan and Wendy (1.3). Office conference with Todd and Jessica to review documents and separate into House, CPAs, Indemnity Agreements and General documents showing collusion (2.9).	
1368.001	05/04/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status (.3). Continue with review and organization of Wendy documents (12,000 pages) (2.5).	
1368.001	05/07/2018	1	A	9	400.00	0.70	280.00	ARCH
							Telephone conference with Don Lattin regarding discovery issues to be argued on May 8th. Receive Wendy's opposition to petitioners' motion to return privilege material. Continue work on document organization and retrieval based upon new documents provided by Wendy.	
1368.001	05/07/2018	19	A	9	110.00	4.00	440.00	ARCH
							Continue with review and organization of Wendy documents (12,000 pages) (3.5). Begin dictation of detailed document index (.5).	
1368.001	05/08/2018	1	A	9	400.00	2.20	880.00	ARCH
							Prepare for hearing on discovery issues regarding attorney/client privilege associated with Stan's emails to Wendy. Telephonic appearance at hearing on motion to discourage confidential attorney/client privilege documents. Receive additional documents from Wendy's counsel showing more communications from Stan to Wendy about attorney advise and comments. Office meeting with Don Lattin, Carolyn Renner, Jim, Therese, Todd, and Jessica regarding attorney/client privilege production strategy on deposition schedule, review of document retrieval process and allocation of duties with respect to pending discovery issues.	
1368.001	05/08/2018	19	A	9	110.00	4.10	451.00	ARCH
							Conference with Kent Robison to review case status and assignments (.5). Continue with review of 12,000 pages of Wendy documents (1.3). Prepare for and attend status conference with Kent Robison, Therese Shanks, Don Lattin and clients (1.5). Locate and prepare documents/information for Kent Robison (.8).	
1368.001	05/08/2018	44	A	9	250.00	1.00	250.00	ARCH
							meeting with client	
1368.001	05/09/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.8). Continue with review of Wendy documents (1.0). Prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.001	05/10/2018	19	A	9	110.00	3.80	418.00	ARCH
							Continue with review and organization of Wendy documents (1.3). Multiple conferences with Kent Robison to review assignments (.5). Review documents/information from clients for production (1.0). Locate and prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.001	05/11/2018	19	A	9	110.00	2.50	275.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Arrange for duplication of extra ACPA USB drive (.3). Work on detailed index of Wendy documents (1.0). Work on documents/information/exhibits for upcoming depositions (1.0).	
1368.001	05/14/2018	19	A	9	110.00	3.50	385.00	ARCH
							Work on detailed index of Wendy documents (1.0). Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Work on draft supplemental document production (.5). Begin review of ACPA documents (.5).	
1368.001	05/14/2018	1	A	9	400.00	2.20	880.00	ARCH
							Work with Jim Stewart on packaging "Tahoe	

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Client ID 1368.001 Jaksick/Todd								
1368.001	05/15/2018	1	A	9	400.00	2.60	1,040.00	ARCH
							documents" for production. Review McGoy and Hascheff communications to determine whether they are privileged. Review and analyze the following for production and use of exhibits at deposition and trial: premarital agreement, schedule A to Family Trust, Deeds transferring Tahoe to and from Sam, appraisal, option, restraining order regarding Stan for molestation and violence, divorce proceeding docket, MOA regarding option, option payment, Deed to SSJ, extension for option payment, management agreement, second option agreement, Sam's notes regarding \$9.5 million, next listing agreement, next Pierre's letter to Riley, amended assignment of option, proposal to Erickson, Deat's email, Sam's notes, notarization documents regarding second amendment, residual lease, durable power, notice of exercise, unsecured note, deed to TSS, rental agreement, texts regarding Tahoe discussions, and life insurance money, CPA regarding insurance proceeds, Wendy's admission of delivery of binder, Kimmel appraisal, Todd's and Stan's texts about how Stan will pay, Wendy's texts regarding talking to accountants and attorneys, Wendy's texts acknowledging how Tahoe is not in Sam's estate and that Todd's ownership is different than hers, text email showing Stan's involvement in listing property, Stan's email regarding Montreaux use of buy-in on Tahoe. Review, analysis, organize, and summarize exhibits pertaining to indemnification and contribution agreement, mainly. Continue review of Tahoe documents for use at trial, including the following documents: Lexi's signature on buy-in documents, Wendy's support of Stan's buy-in, Wendy's signature on ACPA, email from Stan regarding payment, amended note, pledge agreement, emails to BofA, refinance applications, BofA's approval, Todd's personal guarantee, BofA refinance statement, efforts to get Stan's guarantee, Kreitlin's counter, Sam's email regarding losing TSS file, capital call to TSS, email to Wendy regarding need to resolve Stan's buy-in, comparison chart regarding Stan's renegotiated efforts to buy-in, emails to Wendy regarding Kreitlin's proposed buy-in, Stan's emails attempting to finalize, personal guarantee for Stan with discount analysis, emails to Stan regarding counter being unacceptable, Stan's email regarding ownership proportionate to 235k he invested.	
1368.001	05/15/2018	19	A	9	110.00	2.70	297.00	ARCH
							Conference with Kent Robison to review assignments (.2). Locate and print documents/information for Kent Robison (.5). Work on organization of Wendy document production (1.0). Work on location, preparation and organization of documents/information/exhibits for depositions (1.0).	
1368.001	05/16/2018	1	A	9	400.00	3.10	1,240.00	ARCH
							Read, analyze, and evaluate premarital agreement, 2006 Trust, Schedule A, Deed to Sam, Deed to Trust, Deed to SSJ, Option to Incline TSS, Option Agreement, Stan's divorce decree, and court docket, MOA for Option, Bank Statement regarding Option payment, extension of Option Agreement, Dece email regarding sale, listing agreement, Hascheff letters, Sam's handwritten notes, Kathleen Newby email from Hascheff, Durable Power, Notice of Exercise, Rental Agreement for Incline TSS, Promissory Note executed by TSS, Bank of America Consent, text between Stan and Todd regarding Stan's buy-in, CPA regarding Incline's ownership, TSS Operating Agreement, worksheet prepared by Kevin, Rental Agreement, Stan's emails regarding exercise of Option and Payments, ACPA for Stan's buy-in, transmission to Wendy of Stan's buy-in documents. Organize for use as exhibits at Todd's and Wendy's deposition.	
1368.001	05/16/2018	19	A	9	110.00	4.00	440.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Review and prepare Tahoe documents from client for production (1.0). Review ACPA document disk from client and remove potential privileged documents (1.5). Work on documents/information/exhibits for depositions (1.0).	
1368.001	05/17/2018	1	A	9	400.00	1.30	520.00	ARCH
							Meet with Jim to organize documents provided by clients into respective binders for evidence on each issue raised (.6). Met with client to prepare statutory demands, RFPs, 30(b)(6) topics regarding companies	

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Client ID 1368.001 Jaksick/Todd								
1368.001	05/17/2018	19	A	9	110.00	4.60	506.00	ARCH
							operated by Stan (1.2). Telephone conference with Don Lattin reviewing positions to take on upcoming discovery disputes (.8).	
1368.001	05/18/2018	19	A	9	110.00	1.50	165.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Prepare for and attend client conference with Kent Robison (2.8). Locate and prepare documents/information for Kent Robison (.3). Review indemnity documents disk from client (.5). Review and prepare documents/information/exhibits for depositions (.5).	
1368.001	05/19/2018	19	A	9	110.00	3.60	396.00	ARCH
							Locate and prepare documents/information/exhibits for upcoming depositions (1.0). Telephone conference with Caroline Reinher (MCL) and locate documents/information (.5).	
1368.001	05/21/2018	1	A	9	400.00	1.10	440.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for upcoming depositions (1.3). Review Wendy exhibits with Kent Robison (1.5). Locate and prepare additional exhibits per Kent Robison (.5).	
1368.001	05/22/2018	19	A	9	110.00	4.30	473.00	ARCH
							Work on preparing for Wendy's deposition. Review documents produced to select deposition exhibits. Help organize Todd's documents into specific binders for depositions.	
1368.001	05/23/2018	19	A	9	110.00	4.80	528.00	ARCH
							Conference with Kent Robison to review case status and assignments (.8). Continue with review and organization of documents from client for possible disclosure (2.0). Locate and prepare documents/information for Kent Robison (1.5).	
1368.001	05/24/2018	1	A	9	400.00	1.80	720.00	ARCH
							Multiple conferences with Kent Robison to review case status and assignments (1.0). Locate, review and prepare documents/information/exhibits for upcoming depositions (2.0). Locate, review and prepare documents/information for 16.1 supplemental disclosure (1.8).	
							Prepare agenda for meeting with client. Prepare outline and analysis of eight binders of evidence for accusations concerning Tahoe, indemnification, second amended trust, ACPA's cattle accusations, super cub accusations, and evidence showing collusion and conspiracy between Stan and Wendy to falsely accuse Todd of misconduct. Help Jim organize pleading files for Wendy's counter-petition, Stan's petition regarding Family Trust and Stan's petition regarding Issue Trust. Prepare list of tasks to be completed within the next week. Telephone conference Don Lattin regarding strategy meeting. Respond to Stan's letter regarding 30(b)(6) depositions. Commence overview of available counter-claims to be filed in each trust case against Stan. Commence work on motion for order to compel discovery.	
1368.001	05/24/2018	19	A	9	110.00	5.40	594.00	ARCH
							Multiple conferences with Kent Robison to review assignments (.3). Prepare for and attend conference with Kent Robison, Therese Shanks and client (2.0). Locate and prepare documents/information for Kent Robison and Therese Shanks (.5). Locate and prepare documents for disclosure (1.0). Work on deposition exhibits (.8). Begin review of new documents from client (.8).	
1368.001	05/24/2018	44	A	9	250.00	1.10	275.00	ARCH
1368.001	05/25/2018	19	A	9	110.00	3.10	341.00	ARCH
							meeting with client (1.1)	
							Conference with Kent Robison to review deposition exhibits (.8). Locate and prepare documents/information for Kent Robison (.5). Review new documents from client (1.5). Prepare and send documents for duplication (.3).	
1368.001	05/25/2018	1	A	9	400.00	1.60	640.00	ARCH
							Office conference with client to review client's proposed deposition questions of Wendy Jaksick. Topics discussed included accusations that Janene killed Sam, Todd killed Sam, Wendy's troubles with the law - both criminal and civil. Review documents 403, 409, 405, 412, 413, 11, 975, 2253, 2450 through 2461, 2419. Continue to review documents produced by Todd concerning Supercub and Duck Lake Ranch note and prepare deposition package for 19 Series, including documents 1799, 1812, 1897, and 1896. Participate in meet and confer with counsel and finalize and serve NRCP 30(b)(6) notices for Jaksick Family LLC, Lakeridge Golf Course, Toiyabe, Montreaux Golf Club, Montreaux Golf Club Holding, and Montreaux Development Group.	
1368.001	05/28/2018	1	A	9	400.00	0.85	340.00	ARCH
							(50%) Receive and review Wendy's responses to Don's	



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Client ID 1368.001 Jaksick/Todd								
1368.001	05/29/2018	19	A	9	110.00	4.80	528.00	ARCH
							request for production of documents (.9). Telephone conference with Don regarding significance and relevance of documents produced (.8).	
1368.001	05/29/2018	1	A	9	400.00	0.90	360.00	ARCH
							Review, organize and prepare documents/information/exhibits for upcoming depositions (2.0). Review, organize and prepare documents information for next 16.1 document supplemental disclosure (2.0). Work on Kent Robison document binders.	
1368.001	05/30/2018	19	A	9	110.00	5.60	616.00	ARCH
							(50%) Work on scheduling hearing with Judge Hardy and Commissioner Ayres regarding discovery disputes. Receive letter regarding refusal and problems with Stanley Jaksick producing corporate documents pursuant to statutory demand. Telephone conference with Don regarding next step with regarding to corporate documents.	
1368.001	05/30/2018	44	A	9	250.00	2.25	562.50	ARCH
							Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents, information, and exhibits for upcoming depositions. Prepare for and attend conference with Kent Robison, Don Lattin and client (1.8). Locate and prepare documents and information for next 16.1 Supplemental Disclosure (1.0)	
1368.001	05/30/2018	1	A	9	400.00	1.10	440.00	ARCH
							Meeting with client and co-counsel (1.25); draft status conference report (1);	
1368.001	05/31/2018	19	A	9	110.00	5.60	616.00	ARCH
							(50%) Office conference with Todd Jaksick and Don Lattin to review production of documents produced by Jessica after her review and production of documents from file cabinet. Work on discovery planning and preparation for meeting with Commissioner Ayres.	
1368.001	06/01/2018	19	A	9	110.00	2.60	286.00	ARCH
							Multiple conferences with Kent Robison to review case status (1.0). Locate, organize and prepare documents, information and exhibits for Wendy deposition (2.5). Review documents, information and exhibits with Kent Robison. (.8). Telephone conferences with client. Prepare documents information for client (.3). Work on documents and information for 16.1 Supplemental Disclosure (1.0)	
1368.001	06/01/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	06/01/2018	1	A	9	400.00	2.35	940.00	ARCH
							Conference with Kent Robison to review documents, information and exhibits for Wendy deposition (1.3). Locate and prepare additional documents, information, and exhibits per Kent Robison (1.3)	
							meeting with client	
1368.001	06/02/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	06/03/2018	1	A	9	400.00	1.60	640.00	ARCH
							(50%) Telephone conference with expert with regard to documents needed, timing of discovery, discovery cut-off, and retention as consultant (.9). Prepare status conference statement for Todd as individual for June 4th hearing (1.1). Office conference with Todd Jaksick to obtain documents responsive to discovery requests and to prepare for additional documents and outlines concerning each category of counter-petitions (1.9). Review Supercub issues and ACPA with Todd, review cattle issue with Todd in light of ACPA (.8).	
1368.001	06/04/2018	19	A	9	110.00	6.00	660.00	ARCH
							begin review of Wendy RFP	
							Review and assemble exhibits 1 - 25 to be used at deposition of Wendy Jaksick (1.8). Read and highlighted significant contents of each exhibit to be used (1.4).	
1368.001	06/04/2018	19	A	9	110.00	5.80	638.00	ARCH
							Multiple conferences with Kent Robison to review and prepare documents, information and exhibits for Wendy deposition (2.0). Attend conference with Kent Robison, client, Don Lattin, regarding deposition preparation (1.0). Locate and prepare documents, information and exhibits for Kent Robison for deposition (2.0). Review and prepare documents and information from client (1.0).	
1368.001	06/04/2018	44	A	9	250.00	2.40	600.00	ARCH
							Multiple conferences with Kent Robison to review documents, information and exhibits for Wendy deposition (1.3). Prepare deposition exhibits (2.0). Locate and prepare documents and information for Kent Robison (1.0). Attend conference with Kent Robison, Don Lattin and client (.5). Review client emails and prepare documents for deposition (1.0).	
1368.001	06/04/2018	1	A	9	400.00	4.50	1,800.00	ARCH
							Finish review of RFP (1.4); draft memo re division of labor and potential objections (1)	
							(50%) Morning meeting with Todd to review tactics for commencing Wendy's deposition and review of exhibit 1 & 2 to get clarity (1.2). Took deposition of Wendy Jaksick covering issues related to both Family Trust and Issue Trust (6.7). Strategy conferences and debriefing with Don and Todd (1.1).	

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Client ID 1368.001 Jaksick/Todd								
1368.001	06/05/2018	1	A	9	400.00	3.65	1,460.00 (50%) Review additional exhibits to be used at Wendy's continued deposition, including judgments and criminal charges (.9). Continue taking deposition of Wendy Jaksick (6.4).	ARCH
1368.001	06/06/2018	19	A	9	110.00	4.30	473.00 Multiple conferences with Kent Robison to prepare and review documents, information and exhibits for Wendy deposition (2.0). Locate and prepare documents, information and exhibits for Kent Robison (1.0). Review and prepare documents, information and exhibits from client (1.0). Attend conference with Kent Robison and clients (.3).	ARCH
1368.001	06/06/2018	44	A	9	250.00	1.25	312.50 Meeting with client (0.5); attend Wendy's deposition (0.75)	ARCH
1368.001	06/06/2018	1	A	9	400.00	2.80	1,120.00 (50%) Pre-deposition conference with Don and Todd regarding time allocation for remaining period of time for Wendy's deposition and joint review of additional exhibits consisting of email traffic and texts (1.0). Continue taking deposition of Wendy Jaksick concerning both Family & Issue Trust allegations (4.1). Debrief with Don and Todd regarding Don's examination of Wendy (.5).	ARCH
1368.001	06/07/2018	19	A	9	110.00	2.50	275.00 Conference with Kent Robison to review status (.5). Organize and begin index of deposition exhibits (1.0). Locate and prepare documents/information for Kent Robison (1.0).	ARCH
1368.001	06/08/2018	44	A	9	250.00	0.75	187.50 Meeting with client	ARCH
1368.001	06/08/2018	1	A	9	400.00	2.30	920.00 (50%) Participate in discovery conference with counsel to arrange and schedule pending discovery and deposition (1.1). Prepare for meeting with Pierre Hascheff by reviewing letters and documents Pierre authored, received, or prepared (.8). Meeting with Pierre Hascheff and Don Lattin to discuss thoroughly the involvement, thoughts, and opinions with Pierre with indemnification and Lake Tahoe issues (2.7).	ARCH
1368.001	06/13/2018	44	A	9	250.00	0.70	175.00 Outline discovery commissioner statement (0.5); meet and confer re Wendy requests (0.2)	ARCH
1368.001	06/14/2018	1	A	9	400.00	1.70	680.00 (50%) Review status conference statements filed by other parties in preparation for discovery conference with Commissioner Ayres (.4). Pre-conference discussion with Don Lattin (.4). Attend discovery conference with parties and Commissioner Ayres to argue motions and get reading from Commissioner Ayres on perspective discovery rulings (2.6).	ARCH
1368.001	06/18/2018	19	A	9	110.00	3.40	374.00 Review request for production of documents (2.0). Telephone conference with Kent Robison (.2). Attend telephone conference with Kent Robison and Therese Shanks (.2). Work on deposition exhibit index (.5). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	06/19/2018	49	A	9	120.00	0.10	12.00 Meeting with Kent Robison regarding the RFP to Todd, need to redact attorney client privileged info from the various firm bills (Time split)	ARCH
1368.001	06/19/2018	19	A	9	110.00	4.20	462.00 Review request for production of documents and begin location and assembly of responsive documents already produced (2.0). Conference with Kent Robison to review status (.3). Attend conference with Kent Robison and Therese Shanks (.8). Attend conference with Kent Robison and clients (.8). Locate and prepare documents/information for Kent Robison (.3).	ARCH
1368.001	06/19/2018	44	A	9	250.00	1.40	350.00 meeting re RFP (0.4); meeting with client (1)	ARCH
1368.001	06/19/2018	1	A	9	400.00	3.50	1,400.00 Meeting with Todd to prepare demonstrative evidence regarding chronology, documents, and Sam's involvement with Tahoe house. Work on producing documents in response to Wendy's four sets of RFPs.	ARCH
1368.001	06/20/2018	49	A	9	120.00	2.00	240.00 Redact attorney bill for privileged information to produce pursuant to request	ARCH
1368.001	06/20/2018	19	A	9	110.00	4.30	473.00 Conference with Kent Robison to review status and assignments (.8). Review request for production of documents and continue with location and assembly of responsive documents/information (3.0). Locate, prepare and send documents/information to handwriting expert Green (.5).	ARCH
1368.001	06/20/2018	1	A	9	400.00	1.45	580.00 (50%) Work on structuring the 30(b)(6) depositions and allocating responsibility for companies (.8). Schedule and subpoena 30(b)(6)/records deposition deponents for companies managed by Stan (.4). Work on review of bills to determine whether bills contain work product and attorney/client communications to determine whether any should be produced in response to Stan's discovery requests (.9). Telephone	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	06/21/2018	19	A	9	110.00	4.60	506.00	ARCH
							conference with Todd regarding Wendy's accusations of murder coupled with Jamison's comments to determine whether Jamison's deposition should proceed or be included in separate lawsuit (.8). Update and revise document indexes (.5). Continue with review of request for production of documents and location of responsive documents (2.5). Conference with Kent Robison to review status (.5). Prepare and deliver documents/information for expert to to Federal Express (.8). Locate and prepare documents/information for Kent Robison (.3).	
1368.001	06/21/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Receive and carefully reviewed Judge Hardy's decision on consumer fraud (.3). Work on initial draft of answer to Stan's petitions addressing with some degree of specificity each affirmative defense available (.9).	
1368.001	06/22/2018	19	A	9	110.00	2.80	308.00	ARCH
							Continue with review of all requests for production of documents and locate and list responsive documents/information (2.8).	
1368.001	06/25/2018	19	A	9	110.00	4.50	495.00	ARCH
							Conference with Kent Robison and Therese Shanks to review status and revise responses to requests for production of documents (.5). Continue with review of all requests for production of documents and locate and list responsive document/information (4.0).	
1368.001	06/25/2018	44	A	9	250.00	4.30	1,075.00	ARCH
							Review emails and update memo re who should respond to RFPs (0.2); begin draft responses to RFPs (4.1).	
1368.001	06/26/2018	1	A	9	400.00	0.55	220.00	ARCH
							(50%) Receive, review Stan Jaksick's response to Todd's third request for production of documents (.4). Start draft of letter to initiate the meet and confer obligations (.7).	
1368.001	06/26/2018	19	A	9	110.00	3.80	418.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Work on location and listing of responsive documents to requests for production (2.0). Review Wendy deposition transcripts (.5). Update document indexes (.5).	
1368.001	06/27/2018	44	A	9	250.00	0.90	225.00	ARCH
							Edit RFPs, and outline what client needs (0.75); call with counsel and obtain an extension to respond (0.15).	
1368.001	06/27/2018	1	A	9	400.00	1.20	480.00	ARCH
							Continue to work on objections and responses to Wendy's 1st, 2nd, 3rd, and 4th request for production of documents. Telephone conference with Todd regarding missing documents that are appropriate for disclosure.	
1368.001	06/27/2018	19	A	9	110.00	3.60	396.00	ARCH
							Conference with Kent Robison to review status (.3). Work on location and listing of responsive documents for request for production of documents (2.0). Attend status conference with Kent Robison and Therese Shanks (.5). Prepare and send documents/information to client (.3). Update indexes (.5).	
1368.001	06/28/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.001	06/28/2018	19	A	9	110.00	3.60	396.00	ARCH
							Meeting with clients re RFPs. Work on location of and prepare of responsive documents for requests for production (1.0). Prepare for and attend conference with Therese Shanks and client to review all requests for production and responses (1.8). Telephone conference with expert J. Greene (.3). Review trust document disclosure (.5).	
1368.001	06/29/2018	1	A	9	400.00	2.30	920.00	ARCH
							(50%) Office conference with Todd Jaksick to prepare Todd for upcoming deposition (1.4). Dress rehearsal for mock examination of Todd under simulated deposition circumstances (1.9). Review exhibits with Todd that he is sure to be questioned about (1.3).	
1368.001	06/29/2018	19	A	9	110.00	3.60	396.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Review and print client emails and documents (.8). Review and organize new documents (.5). Work on new information for requests for production (.5). Meet with client and Therese Shanks (1.0).	
1368.001	06/30/2018	44	A	9	250.00	0.60	150.00	ARCH
1368.001	07/02/2018	44	A	9	250.00	0.70	175.00	ARCH
							Review SDT (0.4); outline objections (0.2). Draft objections to SDT to (1) WSR (2) Incline TSS (3) Duck Lake (4) TBJ SC Trust and (5) Todd Family Trust	
1368.001	07/02/2018	19	A	9	110.00	3.40	374.00	ARCH
							Locate and prepare documents/information for Therese Shanks (.3). Work on requests for production responses (.8). Locate and prepare documents/information/exhibits for Kimmel deposition (1.5). Review and revise document indexes (.8).	
1368.001	07/03/2018	19	A	9	110.00	2.90	319.00	ARCH
							Telephone conference with Kent Robison to review assignment (.3). Work on location and preparation of documents/information/exhibits for Kimmel deposition (1.8). Update indexes (.8).	

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Client ID 1368.001 Jaksick/Todd									
1368.001	07/05/2018	1	A	9	400.00	1.00	400.00	Work on Todd's objections to subpoena duces tecum (1.0).	ARCH
1368.001	07/05/2018	19	A	9	110.00	3.80	418.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information/exhibits for Kimmel deposition (2.0). Assist with documents/information for objections to Subpoena (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	07/06/2018	1	A	9	400.00	0.80	320.00	Continue review, outline, and indexing of Wendy's deposition regarding Lake Tahoe issues (.8).	ARCH
1368.001	07/06/2018	19	A	9	110.00	2.50	275.00	Conference with Kent Robison to review documents/information/exhibits for Kimmel deposition (1.5). Locate and prepare additional documents/information/exhibits (1.0).	ARCH
1368.001	07/09/2018	19	A	9	110.00	3.30	363.00	Review and update all document indexes (2.3). Print and review new documents/information from client (1.0).	ARCH
1368.001	07/10/2018	19	A	9	110.00	2.80	308.00	Conference with Kent Robison to review status (.2). Print, review and organize documents/information from client (1.3). Update deposition exhibit binders (.8). Work on responses to Wendy requests for production (.5).	ARCH
1368.001	07/11/2018	1	A	9	400.00	0.70	280.00	Office conference with Todd regarding preparation of graphics for chronology and time line of Sam's involvement, encumbrance and conveyance of Lake Tahoe House.	ARCH
1368.001	07/11/2018	44	A	9	250.00	0.50	125.00	client meeting	ARCH
1368.001	07/11/2018	19	A	9	110.00	3.10	341.00	Continue with assembly and listing of documents for requests for production responses (1.5). Conference with Kent Robison to reievw status (.3). Print, review and organize documents/information from client (1.0). Locate, prepare and send documents/information to client (.3).	ARCH
1368.001	07/12/2018	19	A	9	110.00	3.30	363.00	Conference with Kent Robison to review status and assignments (.5). Update all requests for production with new documents and proposed changes (2.0). Print, review and organize documents from client (.8).	ARCH
1368.001	07/13/2018	19	A	9	110.00	3.70	407.00	Conference with Kent Robison to review status and assignments (.3). Work on documents/information/responses to requests for production of documents (1.8). Attend conference with Kent Robison and client (.8). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.001	07/13/2018	1	A	9	400.00	1.70	680.00	(50%) Work with Todd on deposition preparation and did mock cross examination and rehearsal of examination concerning pertinent and relevant documents.	ARCH
1368.001	07/16/2018	1	A	9	400.00	0.60	240.00	(50%) Work on formulating objections to documents being requested by Stan's SDTs in preparation for scheduled met and confer with Adam. Telephone conference with Don Lattin regarding allocation of responsibility for responding to Stan's SDTs. Review and analyze Family Trust membership interest in Duck Lake and WSR (if any). Confirmation that Family Trust has no interest in WSR.	ARCH
1368.001	07/16/2018	44	A	9	250.00	4.00	1,000.00	Edit RFP responses (3); draft answer to petition re issue trust (1)	ARCH
1368.001	07/16/2018	19	A	9	110.00	4.50	495.00	Conference with Kent Robison to review status (.3). Work on preparing revised responses to requests for production with new documents (3.5). Conference wit Therese Shanks to review status (.2). Work on final version (.5).	ARCH
1368.001	07/17/2018	19	A	9	110.00	2.60	286.00	Conference with Kent Robison to review assignments (.5). Update document indexes with new documents (1.3). Review additional documents from client for possible disclosure (.8).	ARCH
1368.001	07/18/2018	23	A	9	325.00	1.15	373.75	Deposition prep with Todd.	ARCH
1368.001	07/18/2018	1	A	9	400.00	2.80	1,120.00	Met with Todd Jaksick to review series of documents (both indemnification agreements, ACPA's, emails and texts) that will likely be topics at Todd's deposition. Deposition rehearsal with Frank Gilmore and Todd primarily concerning Incline TSS option and transfer of ownership from SSJ to Incline TSS.	ARCH
1368.001	07/18/2018	19	A	9	110.00	4.10	451.00	Multiple conferences with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Telephone conference with expert Green (.3). Work on next 16.1 supplement (1.0). Continue with index and organization of Wendy documents (12K pages) (2.0).	ARCH
1368.001	07/19/2018	19	A	9	110.00	4.10	451.00	Continue with review and revision of Wendy document	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	07/20/2018	19	A	9	110.00	2.60	286.00 indexes (12K pages) (2.5). Conference with Kent Robison to review assignments (.3). REview Kimmel deposition (.5). Work on next 16.1 supplement (.8). Continue with review and revision of all document indexes and creation/revision of chronological index (2.3). Conference with Kent Robison to review assignments (.3).	ARCH
1368.001	07/23/2018	19	A	9	110.00	3.10	341.00 Conference with Kent Robison to review status (.3). Continue with indexing of all documents produced (2.0). Locate, prepare and send documents/information to client (.3). Update deposition roster and binders (.5).	ARCH
1368.001	07/24/2018	1	A	9	400.00	0.70	280.00 Meet and confer with Don regarding objection to SDTs. Prepare for arguments on motion to compel.	ARCH
1368.001	07/24/2018	19	A	9	110.00	2.60	286.00 Locate, prepare and send documents/information to client (.3). Continue with review and revisions to all document indexes (2.0). Locate and prepare documents/information for Kent Robison (.3).	ARCH
1368.001	07/25/2018	44	A	9	250.00	0.40	100.00 meet and confer re subpoenas	ARCH
1368.001	07/25/2018	1	A	9	400.00	2.90	1,160.00 Prepare for "meet and confer" with Adam (.6). Meet and confer with Adam regarding subpoenas. Email to Don regarding who has to produce what. Email Todd regarding need to find documents Pierre and Palmer. Work on outline of topics to cover at Stan's deposition. (50%) Participate in "Meet and Confer" with Adam (1.1). Work on Document Request Letter to Don (.4). Work on revisions to Answer to Stan's Petition (.8). Continued preparation for Stan's deposition (.9).	ARCH
1368.001	07/26/2018	1	A	9	400.00	1.60	640.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.8). WOrk on documents for next 16.1 supplemental disclosure (1.2).	ARCH
1368.001	07/26/2018	19	A	9	110.00	2.30	253.00 Telephone conference with Kent Robison to review assignments (.2). Review 30(b)(6) notices (.3). Locate, prepare and send documents/information for Kent Robison (.3). Continue with organization and indexing of all documents (.3).	ARCH
1368.001	07/27/2018	19	A	9	110.00	2.10	231.00 Draft Second Amended Notices of PMK depositions (6 entities).	ARCH
1368.001	07/27/2018	15	A	9	50.00	0.50	25.00 (50%) Work on document search for responses to Stan's SDTs. Telephone conference with Don Lattin regarding progress being made with Kevin Riley. Office conference with Todd to review documents necessary to respond to RSG, SDT. Review documents produced for Incline to determine whether documents are responsive. Work on preparation for deposition. Work on outline of topics to be covered on Stan's deposition. Office conference with Todd and Nik Palmer to review Nik Palmer's involvement with Sam, Wendy, Stan, and Todd and the various entities including Buckhorn, WSR, TSS, and Geyser.	ARCH
1368.001	07/30/2018	1	A	9	400.00	1.80	720.00 meeting with client and review letter from counsel	ARCH
1368.001	07/30/2018	44	A	9	250.00	0.20	50.00 Multiple conferences with Kent Robison to review status and assignments (.5). Prepare for and attend conference with Kent Robison and client (1.3). Locate and prepare documents/information for Kent Robison (.5). Begin assembly of Stan deposition exhibits (1.0).	ARCH
1368.001	07/30/2018	19	A	9	110.00	3.30	363.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information/exhibits for Stan deposition (3.3).	ARCH
1368.001	07/31/2018	19	A	9	110.00	3.60	396.00 emails re location of depositions	ARCH
1368.001	08/01/2018	44	A	9	250.00	0.20	50.00 Conference with Kent Robison to review status and assignments (.2). Locate and prepare documents/information/exhibits for Stan deposition (1.0). Contact expert Green and telephone conference (.3). Locate and prepare document/information for Kent Robison (.3).	ARCH
1368.001	08/01/2018	19	A	9	110.00	1.80	198.00 (50%) Telephone conference with Don Lattin regarding need for executed waiver waiving potential conflicts of interest between MCL and Todd. Telephone conference with Todd. Review document and finalize conflict waiver.	ARCH
1368.001	08/02/2018	1	A	9	400.00	0.60	240.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Stan deposition (1.5). Work on 16.1 document supplement (.3). Locate and prepare documents/information for Kent Robison (.3). Attend deposition preparation conference with Kent Robison and Todd Jaksick (.5).	ARCH
1368.001	08/02/2018	19	A	9	110.00	2.80	308.00 Telephone conference with Kent Robison to review	ARCH
1368.001	08/03/2018	19	A	9	110.00	1.80	198.00	ARCH

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Client ID 1368.001 Jaksick/Todd								
							assignment (.3). Locate, organize and prepare documents/information/exhibits for Stan deposition (1.5).	
1368.001	08/06/2018	1	A	9	400.00	4.60	1,840.00	ARCH
							Prepared exhibits regarding events pertaining to creation of, operation of and chronology leading to exercise of option (1.3). Deposed Stan on Tahoe issues and his option and related matters (3.3).	
1368.001	08/06/2018	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison (1.0). Attend conference with Kent Robison, client, Lattin (.5). Locate and prepare documents/information for Kent Robison (1.0). Locate and prepare additional documents/information/exhibits for Stan deposition (2.8).	
1368.001	08/07/2018	1	A	9	400.00	5.80	2,320.00	ARCH
							Prepared for deposition by review and marking of exhibits relating to 49 Mountain and Tahoe (1.1). Took Stan's deposition related to Tahoe issues and chronology of events pertaining to Stan's "buy-in" (2.7). Work on assembling signatures for expert's review (.9). Continued review of Wendy's deposition transcript (1.1).	
1368.001	08/07/2018	19	A	9	110.00	3.30	363.00	ARCH
							Review and print documents/information from client (.3). Conference with Kent Robison to review assignments (.5). Locate and prepare additional documents/information/exhibits for Stan deposition (2.0). Locate and prepare documents/information for Kent Robison. (.5).	
1368.001	08/08/2018	1	A	9	400.00	0.70	280.00	ARCH
							(50%) Work on offers of judgments. Research Rule 68 cases to see if one 68 Offer of Judgment, affects the other.	
1368.001	08/08/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.001	08/08/2018	19	A	9	110.00	2.80	308.00	ARCH
							attend Stan deposition Conference with Kent Robison to review assignments (.8). Locate and prepare documents/information for Kent Robison (1.0). Update deposition exhibit index and binders (.5). REview and print documents/information from client (.5).	
1368.001	08/09/2018	44	A	9	250.00	3.75	937.50	ARCH
1368.001	08/09/2018	19	A	9	110.00	2.60	286.00	ARCH
							attend Wendy deposition Conference with Kent Robison to review assignments (.8). Locate and prepare documents/information for Kent Robison (1.0). Update deposition exhibit index and binders (.5). Review and print documents/information from client (.5).	
1368.001	08/10/2018	44	A	9	250.00	2.25	562.50	ARCH
1368.001	08/10/2018	19	A	9	110.00	3.10	341.00	ARCH
							attend Wendy deposition Work on revision of all documents produced indexes, chronological and bates stamp order (1.5). Locate and prepare documents/information for Therese Shanks (.5). Locate and prepare documents/information for clients (.3). Update deposition exhibit binders with new exhibits (.8).	
1368.001	08/10/2018	15	A	9	50.00	2.50	125.00	ARCH
							Prepare Subpoena Duces Tecum for Custodians of Records for 6 entities. Prepare Notice of Issuance of SDT to Custodians of Record. Letter to Adam Hosmer-Henner. Draft Acceptances of Service (6).	
1368.001	08/13/2018	1	A	9	400.00	4.70	1,880.00	ARCH
							(50%) Met with Todd and Don to prepare for deposition by reviewing allegations in counter petitions (1.1). Attend and defend Todd at deposition taken by Adam (7.4). Lunch break conference with Todd and Mike to debrief (.9).	
1368.001	08/13/2018	19	A	9	110.00	3.20	352.00	ARCH
							Conference with Kent Robison to review status (.3). Prepare and deliver original deposition exhibits (.8). Locate and prepare documents/information for reporter (.3). Update/revise all document indexes (1.0). Review new documents form client (.8).	
1368.001	08/14/2018	1	A	9	400.00	5.65	2,260.00	ARCH
							(50%) Met with Todd and Don to review and debrief regarding Monday's deposition (1.3). Defend and attend Todd's deposition taken by Adam (6.9). Debrief with Todd and Don at tend of day (.9). Worked on motion to revoke Johnson's <i>pro hoc vice</i> (2.2).	
1368.001	08/14/2018	44	A	9	250.00	2.00	500.00	ARCH
							research re grounds for pro hac vice admission revocation (1.5); outline motion (0.5)	
1368.001	08/14/2018	19	A	9	110.00	3.40	374.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Review and organize additional documents from client (.8). Work on deposition/witness files (1.8).	
1368.001	08/15/2018	1	A	9	400.00	3.90	1,560.00	ARCH
							(50%) Pre-deposition conference with Todd Jaksick to review nature and scope of Spencer's questions and to work on preparing Todd for further deposition examination (.9). Attend and defend Todd's deposition (6.1). Post deposition debriefing with Don, Todd, and Mike (.8).	

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Client ID 1368.001 Jaksick/Todd									
1368.001	08/15/2018	44	A	9	250.00	2.50	625.00	research re Rule 3.3 and 8.4 (0.5); draft facts and argument portion for motion re pro hac vice (1.5); edit (0.5)	ARCH
1368.001	08/15/2018	19	A	9	110.00	2.80	308.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Update deposition exhibit binders (.5). Work on witness files for upcoming depositions (1.5).	ARCH
1368.001	08/16/2018	1	A	9	400.00	3.85	1,540.00	(50%) Pre-deposition conference with Don and Todd (.7). Attend and defend Todd's deposition (5.1). Work on draft of motion to terminate deposition pursuant to NRCP 30(d); prepare Lattin declaration, Robison declaration, and Todd's declaration in support thereof (1.9)	ARCH
1368.001	08/16/2018	44	A	9	250.00	1.00	250.00	research re terminate deposition (0.5); draft motion and affidavit (0.5)	ARCH
1368.001	08/16/2018	19	A	9	110.00	3.40	374.00	Update deposition exhibit binders (.3). Attend conference with Kent Robison, Lattin, client (.8). Locate and prepare documents/information for Kent Robison (.8). Telephone conference with expert Green and send documents/information via Fed Ex (.5). Locate and prepare and send Stan transcripts to Dan (.5). Arrange for video duplication (.5).	ARCH
1368.001	08/16/2018	15	A	9	50.00	0.25	12.50	Draft Amended Notice of Taking Deposition of Pierre Hascheff and email court reporter.	ARCH
1368.001	08/17/2018	1	A	9	400.00	2.25	900.00	(50%) Work on and complete Rule 30(d) motion to terminate Todd's deposition (1.1). Work on motion to disqualify (1.6). Letter to client, MCL, and Kevin regarding production for 30(b)(6) (.7). Review, organize, and index Stan's deposition (1.1).	ARCH
1368.001	08/17/2018	44	A	9	250.00	2.50	625.00	Finish draft motion (1.5); incorporate KRR briefing into motion (0.5); edit (0.5)	ARCH
1368.001	08/17/2018	19	A	9	110.00	1.60	176.00	Conference with Kent Robison to review status (.3). Attend telephone conference with Kent Robison and Lattin (.5). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.001	08/20/2018	1	A	9	400.00	0.80	320.00	(50%) Continue reading newly produced deposition transcripts of Wendy and Stan to find testimony impeaching sworn amended counter-petition to support motion to revoke pro hac vice admission.	ARCH
1368.001	08/20/2018	19	A	9	110.00	2.60	286.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.8). Review Stan deposition (.5).	ARCH
1368.001	08/20/2018	19	A	9	110.00	3.10	341.00	Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Conference with Kent Robison to review status (.8). Prepare documents to be reviewed for production (.8).	ARCH
1368.001	08/23/2018	1	A	9	400.00	2.05	820.00	(50%) Continue review of notes and emails produced by Todd for our review (1.1). Office conference with Don Lattin, Todd Jaksick to review newly discovered documents including Sam's notes and new emails and to discuss status of motion to terminate deposition (1.6). Office conference with Todd and Stan to discuss and strategize responses to and compliance with NRCP 30(b)(6) deposition topics and subjects identified for Todd's Trusts and Companies (1.4).	ARCH
1368.001	08/23/2018	19	A	9	110.00	3.30	363.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Prepare for and attend conference with Kent Robison, Lattin, clients (1.5). Locate and prepare documents/information for Pierre (.5).	ARCH
1368.001	08/24/2018	1	A	9	400.00	1.40	560.00	(50%) Help Jim prepare chronology of events concerning Tahoe House binder for Pierre (.3). Assemble timeline and exhibits for Judge Hascheff's review in preparation for September 7th deposition (.5). Office conference with Pierre Hascheff and Don Lattin to review documents covered by Wendy's counsel at deposition and status of litigation with Judge Hascheff (2.0)	ARCH
1368.001	08/24/2018	19	A	9	110.00	3.20	352.00	Conference with Kent Robison to review status and assignments (.2). Locate and prepare documents/information for Kent Robison meeting with Hascheff (1.8). Work on next 16.1 document supplement (.5). Locate documents/information/exhibits for motion to disqualify (.3). Attend conference with Kent Robison and Lattin (.4).	ARCH
1368.001	08/27/2018	1	A	9	400.00	0.70	280.00	(50%) Telephone conference with Todd regarding meeting with Jim Corica and whether Corica's testimony will be helpful and whether deposition should be made given his age to preserve testimony (.6).	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	08/27/2018	19	A	9	110.00	0.50	55.00 Telephone conference with Don Lattin regarding position being taken by Wendy and Stan for dismissal of Michael Kimmel from lawsuits (.5). Confirmation to authorize electronic signature provided (.3).	ARCH
1368.001	08/28/2018	1	A	9	400.00	1.40	560.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.3).	ARCH
1368.001	08/28/2018	19	A	9	110.00	2.00	220.00 Revised offers of judgment as instructed by client and obtain written authority to process and serve all offers of judgment (.5). Continue inserting defenses in Todd's proposed objection/answer to Stan's counter-petition in both cases (.4). Continue drafting objections and partial answers to interrogatories served by Wendy on Todd as an individual (.6). Continue working on responses and accumulating documents responsive to Jessica's contributions to answers to 30(b)(6) notices (.7). Office conference with Jessica to review issues and production mandates (.6).	ARCH
1368.001	08/29/2018	19	A	9	110.00	3.10	341.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison for deposition prep (.5). Work on 16.1 document supplement index (1.2).	ARCH
1368.001	08/30/2018	1	A	9	400.00	0.95	380.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate original deposition exhibit binders (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Work on 16.1 production (1.0).	ARCH
1368.001	08/30/2018	19	A	9	110.00	3.30	363.00 (50%) Evaluated Connot's push back letter and started draft of response (.7). Work on deposition schedule (.3). Start draft of reply to motion to terminate and opposition to motion for sanctions (.9).	ARCH
1368.001	08/30/2018	44	A	9	250.00	1.00	250.00 Telephone conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5).	ARCH
1368.001	08/31/2018	19	A	9	110.00	1.80	198.00 Analyze re whether can object to subpoena issued to Hascheff (0.2); respond to email re termination of deposition (0.2); review opposition to motion to terminate deposition (0.6).	ARCH
1368.001	08/31/2018	44	A	9	250.00	2.00	500.00 Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Update documents/exhibit/indexes (.3).	ARCH
1368.001	09/04/2018	19	A	9	110.00	4.30	473.00 Outline reply (0.5); research re termination of depositions (0.5); begin draft reply (1).	ARCH
1368.001	09/04/2018	44	A	9	250.00	0.50	125.00 Locate and prepare documents/information/exhibits for 30(b)(6) depositions (.8). Multiple conferences with Kent Robison to review status (1.0). Locate and prepare additional documents/information/exhibits for Kent Robison (1.0). Print and prepare documents/information from client (.5). Begin review of new Stan documents (5K pages) (1.0).	ARCH
1368.001	09/04/2018	1	A	9	400.00	3.40	1,360.00 continue draft reply	ARCH
1368.001	09/05/2018	19	A	9	110.00	2.00	220.00 (50%) Prepare for and took deposition of Stan Jaksick as 30(b)(6) witness for Toiyabe and 30(b)(6) witness for Jaksick Family LLC. Post deposition conferences with Adam and Don regarding more efficient way to obtain 30(b)(6) information through accountant. Email confirmation. Conference with Don and Adam regarding potential initiation of settlement discussions.	ARCH
1368.001	09/05/2018	44	A	9	250.00	0.70	175.00 Update all deposition exhibit binders (.5). Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Prepare documents for production (.5).	ARCH
1368.001	09/05/2018	1	A	9	400.00	1.20	480.00 emails re depositions (0.2); finish reply ISO mtn to terminate (0.5).	ARCH
1368.001	09/06/2018	19	A	9	110.00	2.50	275.00 (50%) Work on rescheduling 30(b)(6) depositions. Telephone conference with Don Lattin regarding availability of Kevin Riley to answer 30(b)(6) questions. Email traffic to Adam and Don regarding initiation of settlement negotiations. Receive Todd's outline and incorporate outline deal points into deposition questions for Pierre Haschef.	ARCH
1368.001	09/06/2018	44	A	9	250.00	2.00	500.00 Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0).	ARCH
							Review depo transcripts re agitated or improper	ARCH



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Client ID 1368.001 Jaksick/Todd								
1368.001	09/06/2018	1	A	9	400.00	0.50	200.00	ARCH
1368.001	09/06/2018	1	A	9	400.00	0.90	360.00	ARCH
1368.001	09/07/2018	19	A	9	110.00	1.50	165.00	ARCH
1368.001	09/07/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.001	09/10/2018	19	A	9	110.00	4.30	473.00	ARCH
1368.001	09/10/2018	1	A	9	400.00	4.00	1,600.00	ARCH
1368.001	09/11/2018	1	A	9	400.00	2.00	800.00	ARCH
1368.001	09/12/2018	19	A	9	110.00	2.60	286.00	ARCH
1368.001	09/13/2018	19	A	9	110.00	3.80	418.00	ARCH
1368.001	09/13/2018	1	A	9	400.00	1.10	440.00	ARCH
1368.001	09/14/2018	19	A	9	110.00	3.40	374.00	ARCH
1368.001	09/14/2018	1	A	9	400.00	9.20	3,680.00	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	09/17/2018	19	A	9	110.00	2.30	253.00	ARCH
							all issues alleged in petition pertaining to Todd individually. Debrief with Don Lattin and Todd Alexander and Todd Jaksick.	
1368.001	09/17/2018	1	A	9	400.00	0.60	240.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Update deposition roster and indexes (.5). Locate and prepare documents/information/exhibits for motion (.8).	
1368.001	09/18/2018	19	A	9	110.00	1.50	165.00	ARCH
							(50%) Work on reviewing documents provided by Kevin Riley to Adam responsive to Todd's 30(b)(6) notice requests (.3). Email Don Lattin requesting Kevin provide same to Adam for 30(b)(6) noticed for Todd (.2). Work on stipulation to extend expert disclosures and discovery cutoff by and through court approved stipulation (.3). Work on demand for indemnification from Issue Trust and Family Trust for legal fees (.4).	
1368.001	09/19/2018	19	A	9	110.00	0.50	55.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.3).	
1368.001	09/19/2018	1	A	9	400.00	1.20	480.00	ARCH
							Prepare for meeting with Todd Jaksick to review status of production for companies and trusts. Work on conceptual components of demand letter to obtain payment from Family Trust for Todd's fees and costs. Work conceptually on petition to compel Stan to refund \$400,000 of Bronco Billy's funds and \$434,000 used to pay loans owed by Family Trust to Lakeridge. Telephone conference with Don Lattin.	
1368.001	09/20/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference with Kent Robison to review status (.2). Update deposition exhibit binders (.2). Review Pierre deposition (1.0). Prepare documents/information/exhibits for upcoming 30(b)(6) depositions (.3).	
1368.001	09/21/2018	1	A	9	400.00	1.15	460.00	ARCH
							(50%) Receive and review Jamison deposition summary for purposes of determining whether lawsuit for defamation should be processed (.4). Develop a chronology of 30(b)(6) documents produced and began reviewing documents produced by Kevin Riley to Stan's counsel responsive to 30(b)(6) depositions (.9). Continue providing outline information regarding Stan's use of \$400,000 and \$434,000 of Bronco Billy sale proceeds (.6). Draft demand letter for return of funds (.4).	
1368.001	09/21/2018	1	A	9	400.00	0.40	160.00	ARCH
							(50%) Email to and from Mark Krought regarding acceptance of service of subpoena duces tecum on Jessica and Nanette. Telephone conference with Todd Jaksick regarding documents produced for Toiyabe Investment Company. Review of documents produced for TIC with Jessica and Todd. Telephone conference with Don regarding Krought's position that Hascheff's future deposition cannot be scheduled until motion to terminate is decided and work on draft of letter responding to Krought's unreasonable position.	
1368.001	09/24/2018	19	A	9	110.00	2.30	253.00	ARCH
							Review & print new documents from Riley (.3). Conference with Kent Robison to review status & assignments (.5). Locate & prepare documents/information/exhibits for Indemnity Agreement/Fee Demand (1.2). Prepare & send documents/information to client (.3).	
1368.001	09/24/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Office conference with Todd regarding corrections to deposition (.8). Review all of Todd's suggested changes (.5). Start notice of corrections format (.3).	
1368.001	09/25/2018	19	A	9	110.00	2.30	253.00	ARCH
							Locate & prepare documents/information/testimony for fee letter (1.0). Attend conference with Kent Robison, Therese Shanks, client (1.0). Locate & prepare documents/information for Kent Robison (.3).	
1368.001	09/25/2018	1	A	9	400.00	2.70	1,080.00	ARCH
							Office conference with Jessica and Todd to review proposed petition for reconveyance of \$400,000 and \$434,000. Review some of the documents scrutinized by Jessica revealing loan transactions between Trust and Lakeridge and Lakeridge and Toiyabe Golf Club. Review Jessica's schedule of what documents were produced for which entities in response to our 30(b)(6) depositions. Work on more specific opposition to subpoena duces tecum and 30(b)(6) notice of Duck Lake.	
1368.001	09/26/2018	19	A	9	110.00	1.10	121.00	ARCH
							Conference with Kent Robison to review assignments	

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Client ID 1368.001 Jaksick/Todd								
1368.001	09/26/2018	1	A	9	400.00	0.90	360.00 (.3). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.001	09/27/2018	19	A	9	110.00	1.80	198.00 (50%) Meeting with Don and Todd to review need for petition for instructions. Work on letter requesting fees be paid by Family and/or Issue Trust.	ARCH
1368.001	09/27/2018	44	A	9	250.00	0.50	125.00 Review deposition changes/corrections from client (.3). Update all document binders and indexes (1.0). Begin organization of documents/information/exhibits not used for depositions (.5).	ARCH
1368.001	09/27/2018	1	A	9	400.00	0.60	240.00 Review emergency motion to continue the trial and extend discovery (50%) Continue work on petition for reconveyance of proceeds diverted by Stan consisting of Bronco Billy's \$400,000 (.8). Telephone conference with Don regarding Kevin's position on 434 being a payment on a loan owed by Family Trust to Lakeridge (.4).	ARCH
1368.001	09/28/2018	19	A	9	110.00	1.50	165.00 Review and organize documents/information prepped for but not marked for depositions (potential trial exhibit) (1.0). Update documents and deposition exhibit binders (.5).	ARCH
1368.001	10/01/2018	1	A	9	400.00	0.60	240.00 (50%) Revise objections to subpoena duces tecum (.3). Work on reviewing Judge Hascheff's deposition for testimony supporting Todd's interpretation of indemnification agreement (.2). Start draft of demand that Family Trust indemnify and/or pay Todd's legal fee and costs (.7).	ARCH
1368.001	10/01/2018	19	A	9	110.00	2.80	308.00 Conference with Kent Robison to review status and assignments (.5). Update deposition and document binders and indexes (.8). Locate and prepare documents/information for Kent Robison (.5). Continue with review and organize of potential trial exhibits (1.0).	ARCH
1368.001	10/02/2018	19	A	9	110.00	2.00	220.00 Conference with Kent Robison to review status (.5). Review Todd's corrections to all deposition transcripts (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/02/2018	44	A	9	250.00	2.00	500.00 Research re diligence in conducting discovery for continuances (0.5); draft opposition to motion to continue trial (1.3); edit (0.2)	ARCH
1368.001	10/02/2018	1	A	9	400.00	0.60	240.00 (50%) Continue review with Todd and Jim of deposition testimony to prepare notice of corrections for all four versions (.8). Continue drafting demand for payment of fees by looking at all time charged and narratives reviewed (.4).	ARCH
1368.001	10/02/2018	1	A	9	400.00	0.50	200.00 (50%) Receive comments from Don Lattin regarding petition for reconveyance of funds diverted by Stanley of Bronco Billy's proceeds (.5). Inter-office conference with Therese to incorporate changes to reinstate 434 based upon Kevin Riley's expected testimony (.5).	ARCH
1368.001	10/03/2018	1	A	9	400.00	1.40	560.00 (50%) Continue to review and scrutiny of testimony from Pierre Hascheff concerning Sam Jaksick's intent that Todd be indemnified from Family Trust for attorney's fees and all claims against him (.8). Work on discovery issues being expressed by Todd Alexander, Mark Connot and Adam Hosmer-Henner concerning continue deposition for Judge Hascheff (.6). Work on more detailed responses and production of documents for subpoena duces tecum to Nanette and Jessica (.7). Work on including insertions concerning \$434,000 dollar misappropriation by Stan into Todd's petition for refund (.7).	ARCH
1368.001	10/03/2018	19	A	9	110.00	2.10	231.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft Notice of Corrections to depositions for Todd (1.0).	ARCH
1368.001	10/04/2018	19	A	9	110.00	2.30	253.00 Conference with Kent Robison to review status (.5). Work on draft deposition corrections notices for Todd (1.0). Update document indexes (.5). Locate and send documents/information for client (.3)	ARCH
1368.001	10/05/2018	19	A	9	110.00	2.40	264.00 Conference with Kent Robison to review status (.3). Review and revise deposition notice corrections (.8). Update deposition roster and indexes (.3).	ARCH
1368.001	10/08/2018	19	A	9	110.00	0.80	88.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/08/2018	1	A	9	400.00	1.80	720.00 (50%) Office conference with Todd Jaksick and Don Lattin regarding discovery issues, expert designation, and request from Wendy's lawyers to continue dates and trial. Work on opposition to emergency motion to extend discovery. Continue to review with Todd regarding corrections to depositions and clarifications to	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	10/09/2018	1	A	9	400.00	1.85	740.00	ARCH
							non-sensical answers. (50%) Work on Supplemental Objections to Nanette & Jessica's SDTs (1.2). Work on Memo to Todd Alexander re: Pierre's continued deposition (1.1). Work with Todd to assemble Hascheff documents for inspection (.6). Communicate to counsel availability of Hascheff's documents available for inspection (.8).	
1368.001	10/10/2018	19	A	9	110.00	2.10	231.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Prepare additional information for Notice of Deposition Corrections (.3). Locate, prepare and send documents/information to Kent Robison (.5). Begin preparation for documents reviewed by Hosmer for production (1.0).	
1368.001	10/11/2018	19	A	9	110.00	1.80	198.00	ARCH
							Telephone conference with Kent Robison to review status (.3). RView Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	10/11/2018	19	A	9	110.00	1.80	198.00	ARCH
							Telephone conference with Kent Robison to review status (.3). Review Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	10/11/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	10/12/2018	1	A	21			0.00	ARCH
1368.001	10/12/2018	19	A	9	110.00	1.80	198.00	ARCH
							review motion to compel Write off finance charges Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on deposition notice corrections with Kent Robison (1.0).	
1368.001	10/12/2018	1	A	9	400.00	2.50	1,000.00	ARCH
							(50%) Office conference with Nanette to review notary book (.8). Made exhibits from pages of Nanette's notary book (.4). Confer with Todd regarding decisions to pay Ag Credit (.4). Telephone conference with Don and Todd and office conference regarding demand on Phil Kreitlin to authorize payment to Ag Credit and for Stan to produce accountings for sales of Montreaux lots in light of Family Trust interest in proceeds therefrom (.8). Prepare indemnification payment for fees demand letter by review of indemnification agreement provisions (.5), Stan's testimony (.4), Wendy's testimony regarding indemnification (.4). Draft Todd's declaration (.4). Review Hascheff testimony to include in demand (.5). Revise letter to MCL citing above as support for Trust and Issue Trust to pay legal fees charged to Todd by RSSB (.4).	
1368.001	10/15/2018	19	A	9	110.00	1.40	154.00	ARCH
							Work on documents/information to supplemental 16.1 disclosure (.3). Review and revise deposition corrections (.3). Revise document index detailed descriptions (.8).	
1368.001	10/16/2018	1	A	9	400.00	1.70	680.00	ARCH
							(50%) Office conference with Todd regarding sanction order, discuss all pending discovery issues, telephone conference with Don Lattin, review documents requested from Pierre's file.	
1368.001	10/16/2018	19	A	9	110.00	3.10	341.00	ARCH
							Conference with Kent Robison to review assignments (.3). Review/organize boxes of documents from client for upcoming inspection (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on detailed document indexes (1.0).	
1368.001	10/16/2018	44	A	9	250.00	1.00	250.00	ARCH
							Review order (0.2); research re potential reconsideration basis (0.2); begin outline to opposition to motion to compel (0.8)	
1368.001	10/17/2018	19	A	9	110.00	2.60	286.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Work on documents to be produced (organize and locate) (1.0). Continue with review and revision of detailed indexes (1.0). Locate, prepare and send documents/information to Kent Robison (.3).	
1368.001	10/18/2018	1	A	9	400.00	1.55	620.00	ARCH
							(50%) Office conference with Todd to review methods by which responses could be made to subpoena duces tecum. Review in detail subpoenas and topics with Todd. Continue review of the 526 RFPs to see if any manageable strategy or procedure could be implemented to draft a response. Review notary book and modify objection to subpoena duces tecum. Work on preparing Todd for additional topics that will be addressed and covered in continued deposition.	
1368.001	10/19/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Work on scheduling Pierre Hascheff's deposition. Participate with Don and Todd in preparing for pending discovery fight and upcoming meeting with Commissioner Ayres.	
1368.001	10/22/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Start draft of motion for protective order on all outstanding discovery issues. Research Rule 37	

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Client ID 1368.001 Jaksick/Todd								
1368.001	10/22/2018	19	A	9	110.00	1.80	198.00	ARCH
							regarding burdens to obtain protective order. Start itemizing individual discovery requests made by Wendy's counsel. Continue to review methodology by which Jessica's emails could be identified and possibly produced.	
1368.001	10/23/2018	50	A	8	220.00	2.00	440.00	ARCH
1368.001	10/23/2018	19	A	9	110.00	2.50	275.00	ARCH
							Review emails from Kent Robison regarding assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Begin review of Hascheff documents (6K pages) (.8). Continue with detailed descriptions in document indexes (.5).	
1368.001	10/23/2018	44	A	9	250.00	4.00	1,000.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information/exhibits for protective order (1.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	10/23/2018	1	A	9	400.00	2.20	880.00	ARCH
							Outline opposition to motion to compel (1); segregate irrelevant requests into specific topic groups (1); draft opposition re facts and standard of review (2); draft opposition to motion to compel re claims on estate administration (1); draft opposition re mental capacity requests (1); begin draft opposition re financial requests (1).	
1368.001	10/24/2018	19	A	9	110.00	1.90	209.00	ARCH
							(50%) Work on opposition to motion to compel and cross-motion for protective order by analyzing the shear number of requests made by Wendy in RFPs, SDTs, and similar requests of Nanette, Jessica, Pierre and Bob Lagoy (1.4). Draft overview and prepare chart for inclusion, motion for protective order (.5). Review allegations and accusations in Wendy's amended counter-petition to compare with relevance of specified requests (.8). Work on determining how many emails are in Jessica's "system" that would have to be reviewed in order to be responsive to the subpoena duces tecum (1.7).	
1368.001	10/24/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	10/24/2018	1	A	9	400.00	1.70	680.00	ARCH
							Update deposition roster and indexes (.3). Continue with review of 6K pages of Hascheff documents (.8). Continue with revision of detailed document indexes (.8).	
1368.001	10/25/2018	44	A	9	250.00	2.70	675.00	ARCH
1368.001	10/25/2018	19	A	9	110.00	4.00	440.00	ARCH
							continue draft opp re financial requests (50%) Telephone conference with Don Lattin (.3). Review disclosure forms produced by Don to allow Kevin Riley to testify concerning Duck Lake Flat, LLC, White Pine, LLC, Home Camp, LLC without tax returns (.3). Telephone conference with Todd regarding disclosure forms (.3). Office conference with Todd to review Duck Lake, LLC documents and financials included in 30(b)(6) production (.6). Work with Todd to prepare for second round of deposition with review of material recovered by Kevin Spencer and forecast of additional topics to be covered in next session (.8). Receive and review and discuss with client Judge Hardy's order addressing motion to extend discovery, expert deadlines, and trial (.3). Commence work on status conference statement for Todd regarding abuse of discovery tactics to be presented at November 16, 2018 hearing (.4). Work on and complete Todd's response to Wendy's fifth request for production of documents (.4).	
1368.001	10/25/2018	1	A	9	400.00	0.90	360.00	ARCH
							draft opp re 6th requests (2); incorporate KRR edits into opp (0.7)	
							Conference with Kent Robison to review status and assignments (.5). Prepare documents/information for Rile deposition (.5). REVIEW 4 days of Todd deposition testimony for information for Kent Robison (3.0).	
							(50%) Continue draft of opposition to motion to compel and counter-motion for active order, including numerical analysis of 1,819 requests served on Todd and Todd Associates (Jessica, Bob Legoy, and PRN Kevin). Continue work on status conference statement to be submitted on behalf of Todd individually for both cases. Continue to review documents Kevin produced to Todd responsive to 30(b)(6) topics according to and formal agreement with Adam.	
1368.001	10/26/2018	44	A	9	250.00	1.25	312.50	ARCH
1368.001	10/29/2018	19	A	9	110.00	2.80	308.00	ARCH
							Draft opp/motion re sanctions (0.5); edit opp/cntrmtn (0.75)	
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare	

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Client ID 1368.001 Jaksick/Todd								
1368.001	10/29/2018	1	A	9	400.00	5.10	2,040.00	documents/information for kent Robison (.8). Locate nd copy 30(b)(6) documents/usb for production to Adam (.5). Update document indexes (.5). Continue with review of Hascheff documents (.5). ARCH
1368.001	10/30/2018	19	A	9	110.00	2.30	253.00	(50%) Prepare for Kevin Riley deposition by review of accountings and documents provided from 30(b)(6) request (1.2). Office conference with Todd and Don to prepare for Kevin's testimony (1.6). Attend deposition of Kevin Riley (6.9). Post deposition debrief with client and Don regarding accounting issues raised by Adam in examination of Kevin Riley (.5). ARCH
1368.001	10/30/2018	1	A	9	400.00	4.90	1,960.00	Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for depositions (Riley and Todd) (.8). Continue with review of Hascheff documents (1.0). ARCH
1368.001	10/31/2018	44	A	9	250.00	0.50	125.00	(50%) Prepare for and attend deposition of accountant Kevin Riley (4.2). Confer with client to prepare for client's deposition in light of Riley testimony (1.1). Attend and defend deposition of Todd Jaksick (3.7). Post deposition review of testimony and exhibits with Todd and debriefing after deposition testimony (.8). ARCH
1368.001	10/31/2018	19	A	9	110.00	2.10	231.00	Incorporate client edits and final edits to opp mtn/countermtm ARCH
1368.001	10/31/2018	1	A	9	400.00	4.10	1,640.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for today's depositions (.8). Update exhibits on system (.5). Work on revisions to detailed document indexes (.5). ARCH
1368.001	11/01/2018	1	A	9	400.00	0.80	320.00	(50%) Prepare Todd for further deposition testimony (.8). Attend and defend Todd's deposition taken by Kevin Spencer (6.3). Post deposition debrief with client (1.1). ARCH
1368.001	11/01/2018	19	A	9	110.00	2.80	308.00	(50%) Work on providing responses to Stan's request for admissions and responses to interrogatories (1.6). Conference with Kent Robison to review status (.5). ARCH
1368.001	11/02/2018	19	A	9	110.00	1.80	198.00	Locate and prepare documents/information for Kent Robison (.5). Review latest deposition exhibit, organize and index (1.0). Work on detailed document index (.8). Conference with Kent Robison to review status (.3). ARCH
1368.001	11/05/2018	1	A	9	400.00	0.70	280.00	Organize and index deposition exhibits (original, working clean) (.8). Meet with court reporter regarding drop box for exhibits (.2). Continue with detailed document index (.5). ARCH
1368.001	11/05/2018	19	A	9	110.00	2.10	231.00	(50%) Work on preparing answers/responses to Stanley's request for admissions (.3). Work on answers to interrogatories (.4). Submit both to Todd and Don for review (.1). Collaborate with Jim on responding to Stanley's two sets of request for production of documents (.8). ARCH
1368.001	11/06/2018	44	A	9	250.00	1.00	250.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison meeting (.5). Continue with detailed document index (.8). ARCH
1368.001	11/06/2018	19	A	9	110.00	3.40	374.00	Draft discovery responses (0.5); research re objections re admissions in discovery requests (0.5) ARCH
1368.001	11/06/2018	1	A	9	400.00	1.80	720.00	Conference with Kent Robison to review status and assignment (.3). Assist with document information to respond to Stan's discovery requests (2.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for telephone conference with expert Green (.3). ARCH
1368.001	11/07/2018	19	A	9	110.00	2.50	275.00	Draft answers with Todd regarding request for admissions regarding Issue Trust (.4). Draft series of explanations for Todd to understand reasons for denials and admissions and why some are misleading (.5). Telephone conference with Don regarding answers to our phase being limited strictly to Todd as an individual (.3). Letter to client requesting payment for legal services (.3). Review, analyze bills submitted to Todd for payment to determine if write offs are necessary (.3). ARCH
1368.001	11/08/2018	19	A	9	110.00	2.40	264.00	Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Review and respond to client emails (.3). Begin review of Todd deposition Vol. 5 (.8). Work on next 16.1 supplement (.8). ARCH
								Telephone conference with Kent Robison to review status and assignments (.3). Work on responses to Stan's requests for production of documents (1.8).

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Client ID 1368.001 Jaksick/Todd								
1368.001	11/09/2018	19	A	9	110.00	2.40	264.00	ARCH
							Prepare and send documents/information to Kent Robison (.3).	
1368.001	11/09/2018	1	A	9	400.00	1.05	420.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft discovery responses (.8). Locate and prepare documents for Judge Hascheff (.3). Update document indexes (.5).	
1368.001	11/12/2018	1	A	9	400.00	0.75	300.00	ARCH
							(50%) Office conference at Don Lattin's to confer with Don and Todd regarding issues raised by Wendy's counsel, ongoing discovery, experts analysis, and strategies on how to apply for or get fees paid.	
1368.001	11/13/2018	19	A	9	110.00	3.40	374.00	ARCH
							(50%) Prepare declaration in support of Todd's demand for fees (.4). Work on first draft of Todd's status conference statement outlining for Court's consideration magnitude of discovery disputes and magnitude of discovery requests (1.1).	
1368.001	11/13/2018	1	A	9	400.00	0.80	320.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 production (.5). Prepare documents/information for Kent Robison (.5). Prepare for and attend conference with Kent Robison and client to work on discovery responses (1.8).	
1368.001	11/14/2018	19	A	9	110.00	4.00	440.00	ARCH
							Prepare and send documents/information to client (.3). Office conference with Todd to work on answers to interrogatories.	
1368.001	11/14/2018	1	A	9	400.00	1.70	680.00	ARCH
							Conference with Kent Robison to review draft discovery responses (1.0). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison and client to assist with documents/information for request for production responses (2.5).	
1368.001	11/15/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Work on supplement to opposition to motion to continue by including overview of discovery request showing chart of number of request for production, number of topics on subpoena duces tecum, number of interrogatories, request for admissions, compared to specific issues raised in counter-petitions (1.6). Review Todd's roles as Trustee of Issue, Trustee of Family, and as individual to restrict and limit issues pertaining to Todd as individual to finalize argument with curtailing discovery is better solution than continuing trial (1.8).	
1368.001	11/15/2018	19	A	9	110.00	1.50	165.00	ARCH
							(50%) Prepared for hearing reading briefs, etc. (1.2). Motion to compel reviewed (.6). Prepare outline and index of discovery demands (.8). D. See emails and stuff to review for hearing (.2).	
1368.001	11/16/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.001	11/16/2018	19	A	9	110.00	1.80	198.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Locate and prepare documents/information/exhibits for Hascheff deposition (.5). Begin work on draft trial exhibit index (.5).	
1368.001	11/16/2018	1	A	9	400.00	2.40	960.00	ARCH
							(50%) Pre-hearing conference with Don, Therese, Carolyn, and client regarding Court's status hearing. Present at Court's status conference. Discussions among counsel on how to proceed with Court's ruling as amended deadlines. Commence collaboration on who to use "two choices" for mediator - agree on Enzenberger and Gamble. Start work on motion to strike Wendy's new petition for exceeding 30 pages, filing without Court permission, and presenting redundant arguments to Court to influence Court at status conference.	
1368.001	11/17/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.001	11/19/2018	44	A	9	250.00	7.30	1,825.00	ARCH
							attend Pierre Hascheff Deposition	
1368.001	11/19/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference call re next steps with co-counsel (0.3); outline dispositive motion filing deadlines (1); finish opposition to motion to join (3); draft motion to strike (3)	
1368.001	11/20/2018	19	A	9	110.00	2.00	220.00	ARCH
							Telephone conference with Kent Robison to review status and assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Contact reporter regarding copy of hearing transcript (.3). Work on draft trial exhibit index (.8).	
1368.001	11/21/2018	19	A	9	110.00	2.60	286.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Review hearing transcript for information/deadlines (.3). Process deposition transcripts (.5). Work on trial exhibit index (1.0).	
							Telephone conference with Kent Robison to review	

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Client ID 1368.001 Jaksick/Todd								
1368.001	11/27/2018	50	A	9	220.00	0.30	66.00 assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on draft trial exhibit index (.5). Process new deposition transcripts (.5). Prepare summary of claims for Kent Robison (.8).	ARCH
1368.001	11/27/2018	19	A	9	110.00	4.20	462.00 Review case plan w/ Kent Robison and Therese Shanks.	ARCH
1368.001	11/28/2018	19	A	9	110.00	2.30	253.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (1.0). Prepare for and attend conference with Kent Robison and client to prepare discovery responses (1.8). Work on draft trial exhibit index (.3).	ARCH
1368.001	11/29/2018	50	A	9	240.00	2.00	480.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft trial exhibit list/index (1.0). Update all document indexes (.5).	ARCH
1368.001	11/29/2018	44	A	9	250.00	4.50	1,125.00 Meet w/ Kent, Therese, and Jim to discuss case strategy. Begin research for trial protocol re: claims for jury and claims for court.	ARCH
1368.001	11/29/2018	19	A	9	110.00	2.80	308.00 Work on trial protocol (0.5); draft MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by statute of limitations (3.25); begin draft argument portion of MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by release (0.75)	ARCH
1368.001	11/29/2018	1	A	9	400.00	2.40	960.00 Locate and prepare documents/information for Kent Robison (1.0). Conference with Kent Robison to review status (.3). Attend conference with Kent Robison, Therese Shanks, Hannah Fuetsch regarding trial protocol preparation (1.0). Locate and prepare documents/information/exhibits for Therese Shanks (.5).	ARCH
1368.001	11/30/2018	1	A	9	400.00	1.35	540.00 (50%) Office conference to prepare motions for summary judgment and related filings with Todd, Jessica and Don. Work on analysis of discovery requests to determine on Incline TSS documents and emails produced versus those that might not have been produced.	ARCH
1368.001	11/30/2018	44	A	9	250.00	2.00	500.00 (50%) Continue work on answers to interrogatories propounded by Stan (.4). Revise and redraft responses to request for admissions (.3). Telephone conference with Don Lattin regarding sufficiency and adequacy of answers to RFA's and interrogatories (.4). Work on trial protocol statement (.3). Work on opposition to motion to compel regarding Jessica subpoena duces tecum (.6). Revise and draft introduction to motion to strike Wendy's petition (.4). Work on changes to opposition to motion to join indispensable party and finalize (.3).	ARCH
1368.001	11/30/2018	19	A	9	110.00	1.30	143.00 Continue draft motion for summary judgment (1.5); review re outstanding motions/opps (0.5)	ARCH
1368.001	12/03/2018	50	A	9	240.00	2.80	672.00 Conference with Kent Robison to review status (.3). Work on trial exhibit index (.5). Locate and prepare documents/information for Kent Robison. (.5).	ARCH
1368.001	12/03/2018	44	A	9	250.00	1.40	350.00 Meet w/ Kent and Therese re: trial protocol statement. Research statutory claims and claims that go to the court for intro. Finish adding authority to trial protocol intro and standard for bifurcation.	ARCH
1368.001	12/03/2018	19	A	9	110.00	1.00	110.00 Review trial protocol (0.2); finish MOTION FOR SUMMARY JUDGMENT re Stan (0.7); edit (0.5)	ARCH
1368.001	12/03/2018	1	A	9	400.00	3.00	1,200.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Kent Robison (.8).	ARCH
1368.001	12/04/2018	44	A	9	250.00	2.00	500.00 (50%) Office conference with Todd and Jessica to have them assist in Todd's opposition to Wendy's motion to compel production (1.8). Work with Deb Harris on formulating methodology to ascertain number of emails in Jessica's system for AOL and Gmail concerning specified topics (1.1). Work with Deb on declaration to show Commissioner and Judge the fact that Jessica needs to review and possibly produce 46,000 emails (.6). Telephone conference with Jim Green regarding issues raised in handwriting samples (.7). Complete Todd's answers to 1st Set of Interrogatories regarding Family Trust (.6). Met and confer with Todd to finish Todd's answers to 1st Set of Interrogatories regarding Issue Trust (1.2)	ARCH
1368.001	12/04/2018	1	A	9	400.00	2.10	840.00 Draft MOTION FOR SUMMARY JUDGMENT re Wendy's claims	ARCH
							(50%) Continue draft of motion for summary judgment	ARCH



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Client ID 1368.001 Jaksick/Todd								
1368.001	12/05/2018	50	A	9	220.00	1.70	374.00	ARCH
							against Stanley (1.2). Assemble accumulated exhibits and testimony for draft of MSJ against Stan (1.4). Work on finalizing motion for summary judgment on Wendy's claims (.8). Work on assembling exhibits to motion from deposition exhibits and deposition testimony (.8).	
1368.001	12/05/2018	19	A	9	110.00	2.40	264.00	ARCH
							Revise trial protocol statement based on Kent's edits. Research statutes to include in trial protocol statement for statutory claims.	
1368.001	12/05/2018	1	A	9	400.00	3.55	1,420.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend telephone conference with Kent Robison and expert Green (1.0). Locate and prepare documents/information for Green (.3). Attend conference with Kent Robison and client (.3).	
1368.001	12/06/2018	1	A	9	400.00	2.75	1,100.00	ARCH
							(50%) Complete final draft with attached exhibits of MSJ against Wendy (1.9). Finish final draft together with final review of exhibits and testimony of Todd's MSJ motion against Stan (2.2). Telephone conference with Jim Green; review each and every known to give Jim basis for reasons why known are in fact known signatures of Sam and/or Wendy; discuss matters to be included in Jim's expert witness report (2.1). Telephone conference with Mike Ivey regarding IT services for trial (.5). Review, finalize, proof read and change minor portions of Todd's opposition to Wendy's motion to join indispensable parties (.4).	
1368.001	12/06/2018	19	A	9	110.00	2.60	286.00	ARCH
							(50%) Continue development of trial protocol (.4). Work on 1st draft of discovery conference statement (.8). Work on and complete opposition to 40 party joinder motion (.6). Office conference with Todd regarding declarations for opposition (.5). Work on Jury Instructions (.9). Letters to expert regarding refinement of assignment (.8). Letter to MCL regarding fees (.5). Office conference with Jessica regarding deposition notice and details regarding Todd's involvement in various companies (.6). Motion in limine list prepared (.4).	
1368.001	12/07/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	12/07/2018	19	A	9	110.00	1.30	143.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for motion (.4). Locate and prepare documents/information/exhibits for discovery status report (1.2). Attend telephone conference with Kent Robison, Lattin and client (.3). Prepare documents/information for Kent Robison conference with client (.5).	
1368.001	12/07/2018	1	A	9	400.00	0.95	380.00	ARCH
							review new motions	
1368.001	12/10/2018	1	A	9	400.00	1.20	480.00	ARCH
1368.001	12/10/2018	19	A	9	110.00	3.10	341.00	ARCH
							Conference with Kent Robison to review status (.3). Deliver courtesy copies of report to court (.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	12/11/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							(50%) Review status of various discovery issues (.8). Draft Todd's (Trustee and Individually) discovery status report, revised, finalized and filed (1.1).	
1368.001	12/11/2018	19	A	9	110.00	1.90	209.00	ARCH
							Loan agreement discovery.	
							Telephone conference with Kent Robison to review status and assignments (.3). Work on 16.1 supplement (1.0). Locate, prepare and send documents/information to Kent Robison (.3). Locate and print Secretary of State information on all entities identified in our motion (1.5).	
							(50%) Office conference with Don and Todd to review pending motions and discovery including motion to compel regarding Jessica Clayton, Wendy's motion for leave to join indispensable parties, motion to strike Wendy's petition to redress Todd's MSJ against Wendy and Stan, Wendy's motion to compel regarding Childers and Legoy (.9). Review trial protocol statement with Todd (.3). Work on confirming settlement conference with Bob Enzenberger and reserving Sunshine Litigation offices (.3). Participate in discovery dispute conference with Commissioner Ayres (1.1). Debrief with Don and Todd (.2). Work on Jackrabbit Capital call (.2).	
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	

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Client ID 1368.001 Jaksick/Todd	12/12/2018	19	A	9	110.00	2.00	220.00	Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplemental document production (1.0).	ARCH
1368.001	12/12/2018	1	A	9	400.00	1.10	440.00	(50%) Draft Todd's second discovery dispute report based on participation in December 11th discovery dispute conference with Discovery Commissioner (1.2). Review law on out of state subpoena duces tecum and analyze Wendy's records subpoenas for Good Samaritan, Los Angeles Cardiologist and Dr. Cannom (1.0).	ARCH
1368.001	12/13/2018	44	A	9	250.00	0.50	125.00	review Dr. Smith records	ARCH
1368.001	12/13/2018	19	A	9	110.00	2.90	319.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Locate original deposition exhibits (.3). Work on next 16.1 disclosure (.8). Begin review of 300 pages of Sam's medical records (1.0).	ARCH
1368.001	12/13/2018	1	A	9	400.00	2.50	1,000.00	(50%) Work on reply to Wendy's opposition to motion to compel production regarding Jessica Clayton (2.1). Receive and review records of Dr. Ronald Smith for any evidence of mental incapacity (.8). Review filings by counsel for Wendy (.3). Receive and thoroughly review with comments asserted therein James Green's expert witness report (1.8).	ARCH
1368.001	12/14/2018	19	A	9	110.00	3.10	341.00	Multiple telephone conferences with Kent Robison regarding status and assignments (.3). Continue with review of medical records from Dr. Smith (1.8). Research drug side effects (1.0).	ARCH
1368.001	12/14/2018	1	A	9	400.00	1.10	440.00	(50%) Receive and review Wendy's 9th Request for Production of Documents regarding documents on which Todd signed Sam's name (.3). Draft responses to 9th Request for Production of Documents (.4). Review Wendy's second set of interrogatories to Todd and prepare answers (.3). Review Wendy's RFPs to Stan and confer with Todd regarding these discovery requests (.3). Receive and review Jim Green's draft of expert report and provide answers to questions asked (.9).	ARCH
1368.001	12/17/2018	49	A	9	120.00	1.00	120.00	Research designation of percipient expert witness to determine what is needed under the rules, discuss the same with Kent	ARCH
1368.001	12/17/2018	19	A	9	110.00	3.40	374.00	Conference with Kent Robison to review assignments (.3). Assist with documents/information/exhibits for expert disclosure (2.0). Review new documents from Trust (.3). Work on 16.1 supplement (.3). Review Pierre deposition Vol. II (.5).	ARCH
1368.001	12/17/2018	1	A	9	400.00	3.20	1,280.00	(50%) Work on preparing expert disclosures concerning James Green and in collaboration with Don concerning recipient experts (1.2). Telephone conference collaboration with Don Lattin (1.1). Receive, review Wendy's replies to our opposition to her motion to join additional parties (.8). Receive, review Wendy's reply to Don Lattin's opposition to Wendy's petition "to redress" (.9). Telephone conference with Nik Palmer regarding subpoena duces tecum and responses available under Rule 45 (.2). Receive and review Wendy's initial expert disclosures; read carefully report of Campagna, Stoltbach and Wallace (2.2).	ARCH
1368.001	12/18/2018	44	A	9	250.00	0.50	125.00	attend discovery conference	ARCH
1368.001	12/18/2018	19	A	9	110.00	4.00	440.00	Review Wendy's expert disclosures (.3). Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Review new documents from client (.8). Locate and prepare documents/information for discovery hearing (.8). Attend pre-hearing conference with Kent Robison and client (1.0).	ARCH
1368.001	12/18/2018	1	A	9	400.00	2.20	880.00	(50%) Office conference with Don Lattin and Todd Jaksick to prepare for discovery dispute conference (1.4). Participation in telephone discovery dispute conference with Commissioner Ayres (1.6). Prepare, file, and serve 30(b)(6) notices (1.4).	ARCH
1368.001	12/19/2018	44	A	9	250.00	3.00	750.00	Draft objection to request for submission (0.5); review reply in support of emergency motion to remove Todd (0.5); review opposition to MOTION FOR SUMMARY JUDGMENT re Stan (0.5); begin draft reply (1.5)	ARCH
1368.001	12/19/2018	19	A	9	110.00	3.60	396.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.8). Work on	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	12/19/2018	1	A	9	400.00	1.40	560.00	ARCH
1368.001	12/20/2018	44	A	9	250.00	2.50	625.00	ARCH
1368.001	12/20/2018	19	A	9	110.00	3.60	396.00	ARCH
1368.001	12/21/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	12/21/2018	19	A	9	110.00	2.70	297.00	ARCH
1368.001	12/21/2018	1	A	9	400.00	2.00	800.00	ARCH
1368.001	12/24/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	12/24/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	12/24/2018	19	A	9	110.00	2.20	242.00	ARCH
1368.001	12/24/2018	1	A	9	400.00	2.70	1,080.00	ARCH
1368.001	12/26/2018	19	A	9	110.00	2.60	286.00	ARCH
1368.001	12/26/2018	1	A	9	400.00	1.35	540.00	ARCH
1368.001	12/26/2018	1	A	9	400.00	2.60	1,040.00	ARCH
1368.001	12/27/2018	19	A	9	110.00	3.00	330.00	ARCH
1368.001	12/27/2018	1	A	9	400.00	4.60	1,840.00	ARCH
1368.001	12/28/2018	19	A	9	110.00	2.00	220.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	12/28/2018	1	A	9	400.00	1.10	440.00	ARCH
							documents/information for Kent Robison (1.0). (50%) Work on designation of rebuttal experts (.7). Receive, review Kevin Riley's second supplement to designation of expert witnesses (.8). Receive, review supplemental expert witness designations from Wendy concerning notices of deposition for Palmer, Childers, and McQuaid (.3). Receive and review Commissioner's recommendations for Jessica to provide certain emails and documents from server (.4).	
1368.001	12/31/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0).	
1368.001	12/31/2018	1	A	9	400.00	2.10	840.00	ARCH
							(50%) Complete rebuttal expert witness disclosure and filed same (.6). Review Therese's version and draft of Todd's reply to Stan's opposition to motion for summary judgment; made corrections and redraft introduction (.3). Telephone conference with Nik Palmer regarding objection to subpoena duces tecum served on Nik December 17, 2018 (.5). Prepare and made revisions to first draft of Jessica's objection to second subpoena duces tecum (.5). Work on draft of Todd's reply to Wendy's opposition to Todd's motion for summary judgment (.4). Draft Todd's discovery status report to Judge Hardy due January 4th (.7). Telephone conference with Don regarding Kevin Riley's deposition and whether to object or postpone (.3). Start draft of Todd's pretrial disclosures due to be filed January 4, 2019 (.6). Start motion for protective order concerning Jessica being deposed for more than 1 day (.3).	
1368.001	01/02/2019	1	A	9	400.00	4.20	1,680.00	ARCH
							(50%) Prepare for settlement conference (3.6). Attendance at settlement conference (3.6).	
1368.001	01/02/2019	44	A	9	250.00	5.25	1,312.50	ARCH
							Research re statute of limitations (0.5); outline reply iso MOTION FOR SUMMARY JUDGMENT re Wendy (0.5); draft reply (1.25); edit (0.25); finish outline to opp to Stan Mtn Strike (0.5); draft opp (1.5); edit (0.5); review mtn to exclude by Trustees (0.25)	
1368.001	01/02/2019	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information/exhibits for upcoming depositions (1.0). Work on trial exhibit index (.8).	
1368.001	01/03/2019	1	A	9	400.00	4.80	1,920.00	ARCH
							(50%) Pre-conference meeting with clients and counsel (1.4). Settlement conference (8.2).	
1368.001	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review status (.2). Work on trial document index (.8). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information/exhibits for Riley deposition (.5). Locate and pickup original deposition exhibits (.5). Print documents/information for Kent Robison (.5).	
1368.001	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.5). Deliver original deposition exhibit binders (.5). Assist with documents/information for pre-trial disclosures (1.8).	
1368.001	01/04/2019	44	A	9	250.00	1.50	375.00	ARCH
							Outline reply to motion to strike (0.5); draft reply (0.75); edit (0.25)	
1368.001	01/04/2019	1	A	9	400.00	4.10	1,640.00	ARCH
							(50%) Kevin Riley deposition.	
1368.001	01/05/2019	1	A	9	400.00	2.90	1,160.00	ARCH
							(50%) Kevin Riley deposition.	
1368.001	01/07/2019	44	A	9	250.00	3.50	875.00	ARCH
							Research re UTA, Restatement and Nevada law on duty to report (2); begin compiling comparative memo for trial re same (1.5)	
1368.001	01/07/2019	19	A	9	110.00	4.40	484.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information for Kent Robison (1.3). Work on trial exhibit index (.5). Assemble and prepare first set of exhibits for duplication (1.0). Locate and prepare documents/information/exhibits for motions (.8).	
1368.001	01/07/2019	1	A	9	400.00	2.70	1,080.00	ARCH
							(50%) Motion to strike Wendy's petition; work on reply; redraft introduction; incorporate provisions from restatement of trusts (.6). Work on our response to Stan's motion to strike (1.4). Work with Jim and Debra on organizing trial exhibits and conforming deposition index to Court Clerk's requirements (2.2). Work on deposition scheduling with letter to all counsel (1.2).	
1368.001	01/08/2019	44	A	9	250.00	5.25	1,312.50	ARCH
							Finish researching and drafting memo re trustee duties under NV law, UTA and Restatement (3.5); edit (1); attend discovery hearing (0.75)	
1368.001	01/08/2019	19	A	9	110.00	4.10	451.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison and	

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/08/2019	1	A	9	400.00	1.45	580.00	ARCH
							Mark Juey (Trial Techo) (.5). Begin preparation of information for mark Juey (.5). Review Wendy's new disclosures (.3). Work on assembly of trial exhibits (1.8).	
1368.001	01/09/2019	44	A	9	250.00	5.50	1,375.00	ARCH
							(50%) Office conference with Mark Ivey to set up IT for display of exhibits and deposition testimony to court and jury (1.4). Prepare for discovery conference with Commissioner Ayres (.3). Participate in discovery conference with Commissioner Ayres (1.2).	
1368.001	01/09/2019	19	A	9	110.00	3.80	418.00	ARCH
							Call with client and co-counsel (0.25); research re trusts being deposed (0.5); outline motion (0.5); pull deposition excerpts (0.5); draft motion (3); edit (0.5); draft affidavits (0.25)	
1368.001	01/09/2019	1	A	9	400.00	1.10	440.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Attend status telephone conference with Kent Robison, Therese Shanks, Lattin (.8). Locate and prepare documents/information/exhibits for Therese Shanks (1.0). Work on trial exhibits and binders (1.0).	
1368.001	01/10/2019	44	A	9	250.00	2.00	500.00	ARCH
							(50%) Conference with Don Lattin, Todd Jaksick regarding allocation and division of assignments for upcoming deposition and discovery issues. Letters to counsel regarding upcoming deposition of experts. Work with Mark Connot to move deposition dates for various experts pursuant to stipulation. Work on jury instructions with Claudia.	
1368.001	01/10/2019	19	A	9	110.00	3.80	418.00	ARCH
							Confer re discovery dispute and discovery dispute statements (1); review Wallace report re what law he relies upon (1)	
1368.001	01/10/2019	1	A	9	400.00	1.10	440.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Attend deposition prep conference with Kent Robison and Childers and Clayton (1.0). Work on next 16.1 disclosure (1.0). Work on trial exhibits (1.0).	
1368.001	01/11/2019	1	A	9	400.00	3.30	1,320.00	ARCH
							(50%) Deposition preparation with Nanette Childers (.5). Work with Jessica on obtaining additional documents concerning exchange between Sam's office and Pierre's office in December 2012 (.4). Research notary laws regarding Nanette's notarization (.3). Work on discovery status report for Judge Hardy and complete same (1.0).	
1368.001	01/11/2019	44	A	9	250.00	4.00	1,000.00	ARCH
							(50%) Continue to draft jury instructions (.2). Research implications of whether restatement third applies to jury instructions (.2). Research specific provisions of restatement cited by Wallace and in Wendy's petition (.4). Work on drafting motion in limine regarding Wendy's experts (1.2). Continue to work on deposition summary of Wendy (3.1). Outline for trial statement (1.5).	
1368.001	01/11/2019	19	A	9	110.00	3.90	429.00	ARCH
							Jury instructions (3); review potential motions in limine and bases for trial statement (1)	
1368.001	01/14/2019	44	A	9	250.00	4.00	1,000.00	ARCH
							Conference with Kent Robison to review assignments (.3). Work on trial exhibit binders (1.3). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplement (.5). Review/prepare Jessica documents (700 pages) (1.0).	
1368.001	01/14/2019	19	A	9	110.00	5.10	561.00	ARCH
							Review Wendy Opp (0.5); research re Wendy authority (0.5); draft reply (2); begin draft MIL (1)	
1368.001	01/14/2019	1	A	9	400.00	2.00	800.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information/exhibits for upcoming expert depositions (2.5). Download documents/information for Mark Juey (.5). Review new documents from Wendy (.8). Deliver and pickup deposition exhibit binders (.5).	
1368.001	01/15/2019	1	A	9	400.00	3.70	1,480.00	ARCH
							(50%) Office conference with Nanette Childers to prepare for deposition (.8). Appearance at and defend Nanette's deposition (3.2).	
1368.001	01/15/2019	44	A	9	250.00	3.50	875.00	ARCH
							(50%) Deposition preparation for Campagna. Deposition of expert Campagna. Conference with Don and Todd. Interrogatories. Telephone conference with Jess. Motions in limine.	
1368.001	01/15/2019	19	A	9	110.00	5.40	594.00	ARCH
							Research re expert testimony on intent, credibility and contract interpretation (0.5); research re exclusion of evidence re discovery disputes (0.5); draft MIL re exclude Stolbach, discovery dispute, pejorative terms, begin re Campagna, Wallace (2.5)	
							Multiple conferences with Kent Robison for deposition prep and status update (.5). Locate and prepare	

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/16/2019	19	A	9	110.00	3.70	407.00 documents/information/exhibits for expert deposition (2.5). Work on trial exhibits (.3). Locate and prepare documents/information for Kent Robison (.8). Work on JC 16.1 supplement (.3). Locate, prepare documents and attend discovery hearing (1.0).	ARCH
1368.001	01/17/2019	44	A	9	250.00	0.50	125.00 Conference with Kent Robison to review status (.2). Update deposition exhibit binders (.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Review latest Wendy disclosure (.5). Locate and prepare documents/information for Kent Robison (1.0).	ARCH
1368.001	01/17/2019	19	A	9	110.00	4.80	528.00 Draft MIL re no expert testimony	ARCH
1368.001	01/17/2019	1	A	9	400.00	2.80	1,120.00 Conference with Kent Robison to review status and deposition exhibits (.5). Locate and prepare additional documents/information/exhibits for deposition (1.0). Update deposition exhibit binders (.3). Attend conference with Kent Robison, Lattin and client (1.0). Work on trial exhibit (1.0). Review Ticor and Bank of America documents (1.0).	ARCH
1368.001	01/17/2019	1	A	9	400.00	0.90	360.00 (50%) Prepare for Stolbach deposition by reviewing all aspects of expert witness report (.4). Review via statutes regarding Todd's duty and obligation to follow testators "intent" (.3). Took deposition of Gary Stolbach (4.9).	ARCH
1368.001	01/18/2019	19	A	9	110.00	3.40	374.00 (50%) Office conference with Jessica Clayton to review all documents that she notarized in preparation for her deposition (1.4). Receive, review Stan's reply to Todd's opposition to motion to strike (.4).	ARCH
1368.001	01/18/2019	1	A	9	400.00	1.10	440.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on preparation of trial exhibit binders (1.8). Work on final 16.1 supplement (.3). Update deposition exhibit binders (.5).	ARCH
1368.001	01/21/2019	1	A	9	400.00	1.10	440.00 (50%) Deposition preparation session with Jessica Clayton. Prepare discovery status report for Judge Hardy.	ARCH
1368.001	01/21/2019	44	A	9	250.00	2.25	562.50 (50%) Worked with Jessica to prepare for deposition. attend deposition of Bob LeGoy	ARCH
1368.001	01/21/2019	19	A	9	110.00	1.00	110.00 Work on trial exhibits (1.0).	ARCH
1368.001	01/22/2019	1	A	9	400.00	5.60	2,240.00 (50%) Met with Jessica Clayton and review documents signed by Sam that she notarized (1.5). Appear at and defend Jessica's deposition (8.5). Prepare for discovery dispute conference with Wesley Ayres (.2). Participate in discovery dispute conference with Commissioner Ayres (.9). Prepare to take deposition of Wendy's expert Wallace (2.1).	ARCH
1368.001	01/22/2019	44	A	9	250.00	1.00	250.00 Review order re motion to strike and trial orders (0.5); discovery conference (0.5)	ARCH
1368.001	01/22/2019	19	A	9	110.00	5.60	616.00 Multiple conferences with Kent Robison to review status and assignments (.8). Attend deposition preparation conference with Kent Robison and Jess (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on documents for Audio/Tech person (.5). Work on trial exhibits and exhibit index (2.5).	ARCH
1368.001	01/23/2019	1	A	9	400.00	4.80	1,920.00 (50%) Prepare for deposition of Bruce Wallace by reviewing report references and favorable testimony of Pierre Hascheff and Bob Legoy (2.2). Took deposition of Bruce Wallace (3.8). Participate in deposition of Bruce Wallace taken by Don Lattin (2.1). Work on motion in limine regarding Wallace testimony (.5). Continue work on jury instructions (.6). Start drafts of demonstrative evidence (.4).	ARCH
1368.001	01/23/2019	44	A	9	250.00	2.00	500.00 Research re jury v. court issue (1); draft MIL re exclusion of equitable evidence (1)	ARCH
1368.001	01/23/2019	19	A	9	110.00	6.00	660.00 Multiple conferences with Kent Robison to review assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information/exhibits for Kent Robison (1.0). Work on trial exhibits and exhibit index (3.5).	ARCH
1368.001	01/24/2019	44	A	9	250.00	1.50	375.00 attend deposition of Brian McQuaid	ARCH
1368.001	01/24/2019	19	A	9	110.00	5.30	583.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Work on trial exhibits and exhibit index (3.5). Organize and prepare depositions for trial (.5). Prepare and send documents/information to client (.3).	ARCH
1368.001	01/24/2019	1	A	9	400.00	0.85	340.00 (50%) Office conference with Todd Jaksick regarding pending issues for settlement discussions (.3). Confer	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/25/2019	19	A	9	110.00	5.00	550.00	ARCH
and discuss regarding need to respond to Wendy's RFPs as recommended by Commissioner Ayres (1.4). Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Work on trial exhibit binders and index (3.2). Locate, prepare and send documents/information to expert Green (.5). (50%) Pre-deposition conference with James Green to go over documents and matters on which James would be deposed on Monday (1.6). Prepare and file discovery status report for Judge Hardy (.5). Work on objections to recommendations made by Wesley Ayres concerning production of financial statements (.3). Work on and finalize objection to subpoena duces tecum sent to me, but not served on James Green (.8). Telephone conference with Judge Hardy as relating to marking of exhibits and pre-trial status of all pending matters (1.4).								ARCH
1368.001	01/25/2019	1	A	9	400.00	2.30	920.00	ARCH
(60%) Trial preparation - Deposition (Wendy) Summary								ARCH
1368.001	01/26/2019	1	A	9	400.00	3.00	1,200.00	ARCH
1368.001	01/27/2019	1	A	9	400.00	3.00	1,200.00	ARCH
1368.001	01/28/2019	19	A	9	110.00	5.60	616.00	ARCH
Multiple conferences with Kent Robison to review status and assignments (1.0). Locate, organize and prepare trial exhibits (2.3). Index trial exhibits (1.5). Locate and prepare transcript for trial (.8).								ARCH
1368.001	01/28/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	01/28/2019	1	A	9	400.00	4.30	1,720.00	ARCH
(50%) Review exhibits submitted to James Green to confer and prepare for Green's deposition (.8). Telephone conference with Todd regarding stamp, certificate of trust, and cutting and pasting Jarad (.7). Participate in deposition of James Green (5.9). Conference with Don and Todd regarding parameters and details of settlement discussions between Todd and Stan (.9). Work on motion in limine regarding authentication of documents and ability of documents not going to jury (.3)								ARCH
1368.001	01/29/2019	19	A	9	110.00	5.50	605.00	ARCH
Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit binders (4.0).								ARCH
1368.001	01/29/2019	44	A	9	250.00	1.50	375.00	ARCH
Review re trial MIL, statement, objections, etc. (0.25); draft additional MIL (0.5); draft objection to subpoena (0.5); draft supplement to discovery dispute report (0.25)								ARCH
1368.001	01/29/2019	1	A	9	400.00	4.70	1,880.00	ARCH
(50%) Work on responding with documents responsive to Commissioner's recommendation with meeting with Todd and Jessica (3.2). Complete motions in limine by including references to testimony of Stolbach Wallace and Campagna (2.2). Prepare for discovery conference with Commissioner Ayres (.8). Participate in discovery dispute conference with Commissioner Ayres (1.5). Email Green regarding originals (.2). Continue work on jury instructions from statutes and pattern regarding evidentiary issues (.6). Telephone conferences with Todd, Don, and Bob Enzenberger regarding settlement issues and points to be raised to find money for settlement (.9).								ARCH
1368.001	01/30/2019	19	A	9	110.00	5.30	583.00	ARCH
Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on/assist with responses to discovery (1.0). Work on trial exhibit binders (2.8).								ARCH
1368.001	01/30/2019	44	A	9	250.00	5.50	1,375.00	ARCH
Review Wendy's and Stan's MIL (1.5); draft response to Stan's MIL (1); draft response to Wendy's omnibus MIL (2); begin draft opp to MIL re prior bad acts (1)								ARCH
1368.001	01/30/2019	1	A	9	400.00	5.00	2,000.00	ARCH
(50%) Work on trial statement (.5). Work on responding to Commissioner Ayres' recommendation to produce documents on specified categories in Wendy's RFPs (4.8). Work on settlement with Todd and Don (1.1). Pre-deposition conference with Jessica Clayton (.5). Attend Jessica Clayton deposition (.4). Modify Todd's responses to Wendy's and Stan's motions in limine (.6). Draft jury instructions for statute of limitations, comparative negligence, statutes into instructions, and start draft of verdict forms (2.1).								ARCH
1368.001	01/31/2019	19	A	9	110.00	5.30	583.00	ARCH
Multiple conferences with Kent Robison to review status (.8). Work on trial exhibit binders (3.0). Work on discovery document disclosures (1.0). Locate and prepare documents/information for Kent Robison (.5).								ARCH
1368.001	01/31/2019	44	A	9	250.00	5.25	1,312.50	ARCH
Finish opp to MIL re prior bad acts (1.5); edit (0.5); edit jury instructions (0.5); research re breach of implied								ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	01/31/2019	1	A	9	400.00	6.75	2,700.00	ARCH
							covenant re trust (0.25); research re non-retained expert witnesses (1); draft opposition to MIL re non-retained expert witnesses (2)	
1368.001	02/01/2019	19	A	9	110.00	5.50	605.00	ARCH
							(50%) Work with Don and Todd on settlement with Stan (2.1). Work on voir dire, jury selection questions (1.8). Work on and draft jury instructions from statutes from pattern instructions and from case law provided by Therese (3.2). Start rough draft of verdict forms (.8). Deposition preparation session with Todd (1.2). Work on and complete Todd's second supplementary responses to Wendy's request for production of documents pursuant to Commissioner's recommendation (3.2). Work on notice of withdraw of petition to have Stan return Bronco Billy's money (1.2). Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information for Kent Robison (.5). Locate original depo transcripts (.5). Work on trial exhibit binders and indexes (4.0).	
1368.001	02/01/2019	44	A	9	250.00	4.20	1,050.00	ARCH
							Review re needed filings (0.5); draft jury instruction re aiding and abetting (0.25); draft supplemental MIL (0.5); edit resp re Stan MIL (0.25); finish opp MIL re non-retained experts (1.5); edit (0.5); draft withdrawal of expert (0.2); review juror questionnaire (0.5)	
1368.001	02/01/2019	1	A	9	400.00	6.45	2,580.00	ARCH
							(50%) Office conference with Don and Todd to prepare for Todd's deposition by review of documents produced in response to Discovery Commissioner's recommendations (1.2). Appear at and defend Todd at deposition (7.0). Arguments to Discovery Commissioner regarding settlement (.3). Work on jury instructions for aiding and abetting damages and wrote out verdict forms (1.8). Post deposition conference with Don and Todd regarding schedule for week of February 4th and allocations of duties, assignments and responsibilities for next week (.8). Finalize supplemental motion in limine regarding settlement (.3). Prepare and file notice to withdraw petition for Stan to return proceeds from Bronco Billy (.2). Receive and start review of jury list (.9). Distribute juror profile characteristics to co-counsel and Todd (.2). Email to Phil and Adam regarding review of jury list for persons with whom Stan has association or knowledge about (.2).	
1368.001	02/02/2019	19	A	9	110.00	2.50	275.00	ARCH
							Conference with Kent Robison (.3). Work on trial binders (2.2).	
1368.001	02/02/2019	44	A	9	250.00	3.00	750.00	ARCH
							Review motion to continue (0.5); outline opp (1); begin draft opp (1.5)	
1368.001	02/02/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/03/2019	19	A	9	110.00	3.80	418.00	ARCH
							(60%) Trial preparation. Multiple conferences with Kent Robison to review status (.2). Work on trial exhibit binders and exhibits (3.5).	
1368.001	02/03/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/04/2019	19	A	9	110.00	6.00	660.00	ARCH
							(60%) Trial preparation. Multiple conferences with Kent Robison to review status and assignments (1.0). Prepare and deliver all exhibit books to courthouse (2.5). Locate and prepare documents/information for Kent Robison (.5). Work on electronic and exhibits for trial (1.0). Attend exhibit marking (1.0).	
1368.001	02/04/2019	44	A	9	250.00	4.25	1,062.50	ARCH
1368.001	02/04/2019	1	A	9	400.00	5.28	2,112.00	ARCH
							Finish opp mtn to continue (2); attend hearings (2.25) (60%) Pre-trial meeting with client regarding motion to continue (.6). Appear at court for marking of exhibits with negotiations concerning marking with Spencer & Johnson (1.8). Continue review of motions, oppositions, and replies in limine to prepare for arguments (1.2). Argue Wendy's motion to continue before Judge Hardy (3.0). Met with Todd to debrief after court (.4). Start review and preparation for argument on motion to exclude Stolbach (1.8).	
1368.001	02/05/2019	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (1.0). Work on documents/information/exhibits for Mark Ivey (2.5). Update working exhibits for Kent Robison (.8).	
1368.001	02/05/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	02/05/2019	1	A	9	400.00	3.75	1,500.00	ARCH
							Attend PTC Hearing (50%) Review motions and cases regarding prior bad acts motion in limine to prepare for argument (2.1). Appearance in court with Judge Hardy regarding ruling on motion to continue (1.4). Attend and participate in settlement efforts with Stan's counsel and Wendy's	



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	02/06/2019	19	A	9	110.00	5.00	550.00	ARCH
1368.001	02/06/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/07/2019	1	A	9	400.00	4.50	1,800.00	ARCH
1368.001	02/07/2019	19	A	9	110.00	4.80	528.00	ARCH
1368.001	02/07/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	02/08/2019	19	A	9	110.00	5.60	616.00	ARCH
1368.001	02/08/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.001	02/08/2019	1	A	9	400.00	4.80	1,920.00	ARCH
1368.001	02/09/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/10/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/11/2019	19	A	9	110.00	4.50	495.00	ARCH
1368.001	02/11/2019	1	A	9	400.00	6.00	2,400.00	ARCH
1368.001	02/12/2019	19	A	9	110.00	5.10	561.00	ARCH
1368.001	02/12/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.001	02/12/2019	1	A	9	400.00	6.00	2,400.00	ARCH
1368.001	02/13/2019	19	A	9	110.00	4.90	539.00	ARCH
1368.001	02/13/2019	19	A	9	110.00	6.30	693.00	ARCH
1368.001	02/13/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.001	02/13/2019	1	A	9	400.00	6.00	2,400.00	ARCH
1368.001	02/14/2019	44	A	9	250.00	4.00	1,000.00	ARCH
1368.001	02/14/2019	1	A	9	400.00	6.00	2,400.00	ARCH
1368.001	02/15/2019	19	A	9	110.00	5.50	605.00	ARCH
1368.001	02/15/2019	44	A	9	250.00	3.25	812.50	ARCH
1368.001	02/15/2019	1	A	9	400.00	6.00	2,400.00	ARCH
1368.001	02/16/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/17/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/18/2019	19	A	9	110.00	1.60	176.00	ARCH
1368.001	02/18/2019	1	A	9	400.00	2.40	960.00	ARCH

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Client ID 1368.001 Jaksick/Todd									
1368.001	02/19/2019	19	A	9	110.00	5.60	616.00	Multiple conferences with Kent Robison to review assignments (.8). Telephone conference with Todd Alexander and prepare and send documents/information (.5). Attend portions of trial (1.5). Update exhibit books with new exhibit (.8). Locate and prepare documents/information for tomorrow (1.0).	ARCH
1368.001	02/19/2019	44	A	9	250.00	4.50	1,125.00	Trial	ARCH
1368.001	02/19/2019	1	A	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/20/2019	19	A	9	110.00	5.10	561.00	Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents/information for Kent Robison (1.0). Deliver documents/information/exhibits to Kent Robison and courthouse (1.0). Revise/update/exhibit binders (1.0). Locate and prepare documents/information/exhibits for tomorrow (1.3).	ARCH
1368.001	02/20/2019	44	A	9	250.00	4.50	1,125.00	Jury trial (1); review Stan Depo testimony and outline topics for KRR (3.5)	ARCH
1368.001	02/20/2019	1	A	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/21/2019	19	A	9	110.00	5.30	583.00	Work on Kent Robison binders of Todd exhibits (1.0). Multiple conferences with Kent Robison to review status (1.0). Attend trial (2.5). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.001	02/21/2019	44	A	9	250.00	3.00	750.00	Review WEndy Depo Testimony	ARCH
1368.001	02/21/2019	1	A	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/22/2019	19	A	9	110.00	5.00	550.00	Multiple conferences with Kent Robison to review status (1.0). Locate and review documents/information for Kent Robison (1.0). Attend trial (3.0).	ARCH
1368.001	02/22/2019	44	A	9	250.00	5.00	1,250.00	Trial (3); further review of Wendy depo (2)	ARCH
1368.001	02/22/2019	1	A	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/23/2019	1	A	9	400.00	2.40	960.00	(60%) Trial preparation.	ARCH
1368.001	02/24/2019	1	A	9	400.00	3.00	1,200.00	(60%) Trial preparation.	ARCH
1368.001	02/25/2019	19	A	9	110.00	5.80	638.00	Multiple conferences with Kent Robison to review status (1.0). Prepare documents/information/exhibits for today's witnesses (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	ARCH
1368.001	02/25/2019	44	A	9	250.00	5.00	1,250.00	trial	ARCH
1368.001	02/25/2019	1	A	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/26/2019	1	P	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	678
1368.001	02/26/2019	19	P	9	110.00	5.80	638.00	Multiple conferences with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibits for Kent Robison (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	684
1368.001	02/26/2019	44	P	9	250.00	4.25	1,062.50	draft motion for directed verdict (1); attend trial (3.25)	689
1368.001	02/27/2019	1	P	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	679
1368.001	02/27/2019	19	P	9	110.00	6.40	704.00	Multiple conference with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibit for Kent Robison & Lattin (1.3). Attend trial (3.3). Locate & prepare documents/information/exhibit for tomorrow (.8).	685
1368.001	02/27/2019	44	P	9	250.00	4.50	1,125.00	Attend Trial	690
1368.001	02/28/2019	1	P	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	680
1368.001	02/28/2019	19	P	9	110.00	6.00	660.00	Multiple conferences with Kent Robison to review status & assignments (1.2). Locate & prepare documents/information/exhibits for Kent Robison (1.3). Attend trial (2.5). Prepare documents/information/exhibits for tomorrow (1.0).	686
1368.001	02/28/2019	44	P	9	250.00	5.25	1,312.50	Attend trial (4.5); review jury instructions (0.75)	691
1368.001	03/01/2019	1	P	9	400.00	6.00	2,400.00	(60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	681
1368.001	03/01/2019	19	P	9	110.00	5.30	583.00	Multiple conferences with Kent Robison to review assignments (1.5). Locate & prepare documents/information/exhibits for Kent Robison (.8).	687

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Client ID 1368.001 Jaksick/Todd								
1368.001	03/01/2019	44	P	9	250.00	4.50	1,125.00	692
							Attend trial (2.0). Work on charts, documents, information exhibits for tomorrow (1.0).	
1368.001	03/02/2019	1	P	9	400.00	2.40	960.00	682
1368.001	03/02/2019	44	P	9	250.00	1.50	375.00	693
1368.001	03/03/2019	1	P	9	400.00	3.48	1,392.00	683
1368.001	03/03/2019	44	P	9	250.00	1.75	437.50	694
							Attend trial (2); meet and confer re instructions (1); begin brief on jury instructions (1.5)	
							(60%) Trial preparation.	
							Draft brief on jury instructions	
							(60%) Trial preparation.	
							Review Wendy's supplemental instructions (0.5); edit jury instruction brief (1); draft competing instruction (0.25)	
1368.001	03/04/2019	19	P	9	110.00	6.50	715.00	688
							Multiple conferences with Kent Robison regarding status & assignments (1.5). Prepare documents/information/exhibits/charts for closing (1.0). Locate & prepare documents/information for Kent Robison (1.0). Attend trial (2.0). Wait for verdict (1.0).	
1368.001	03/04/2019	44	P	9	250.00	7.50	1,875.00	695
1368.001	03/04/2019	1	P	9	400.00	8.10	3,240.00	698
							Attend trial	
							(60%) Worked on diagrams for closing. (.9). Worked on review of exhibits to show during closing (.8). Reviewed and analyzed Petitioners power point slides.(.7). Instruction changes and work with court. (1.9) Closing arguments (5.6). Jury deliberation and appear for jury question and taking verdict. (4.4).	
1368.001	03/06/2019	44	P	9	250.00	0.50	125.00	696
1368.001	03/07/2019	44	P	9	250.00	0.50	125.00	697
							outline next steps	
							Meeting with client	
Total for Client ID 1368.001					Billable	1,635.65	377,060.50	Jaksick/Todd
					Non-billable	0.30	33.00	(445) SSJs Trust
					Total	1,635.95	377,093.50	
GRAND TOTALS								
					Billable	1,635.65	377,060.50	
					Non-billable	0.30	33.00	
					Total	1,635.95	377,093.50	

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PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yviloria

**EXHIBIT 9**

**EXHIBIT 9**

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	12/21/2017	1	A	9	400.00		8,774.50	ARCH
1368.002	12/21/2017	1	A	9	400.00		-5,927.75	ARCH
1368.002	12/28/2017	1	A	9	400.00	0.55	220.00	ARCH
1368.002	01/02/2018	19	A	9	110.00	1.25	137.50	ARCH
1368.002	01/03/2018	19	A	9	110.00	0.60	66.00	ARCH
1368.002	01/04/2018	1	A	9	400.00	1.40	560.00	ARCH
1368.002	01/04/2018	19	A	9	110.00	0.25	27.50	ARCH
1368.002	01/05/2018	49	A	9	120.00	0.15	18.00	ARCH
1368.002	01/08/2018	49	A	9	120.00	1.85	222.00	ARCH
1368.002	01/09/2018	19	A	9	110.00	0.30	33.00	ARCH
1368.002	01/09/2018	49	A	9	120.00	0.85	102.00	ARCH
1368.002	01/10/2018	44	A	9	250.00	0.60	150.00	ARCH
1368.002	01/10/2018	19	A	9	110.00	2.90	319.00	ARCH
1368.002	01/10/2018	49	A	9	120.00	0.45	54.00	ARCH
1368.002	01/11/2018	19	A	9	110.00	2.40	264.00	ARCH
1368.002	01/11/2018	1	A	9	400.00	1.45	580.00	ARCH
1368.002	01/11/2018	49	A	9	120.00	1.00	120.00	ARCH
1368.002	01/11/2018	19	A	9	110.00	1.20	132.00	ARCH
1368.002	01/12/2018	49	A	9	120.00	1.60	192.00	ARCH
1368.002	01/12/2018	19	A	9	110.00	0.65	71.50	ARCH
1368.002	01/17/2018	19	A	9	110.00	0.50	55.00	ARCH
1368.002	01/18/2018	19	A	9	110.00	1.30	143.00	ARCH
1368.002	01/19/2018	19	A	9	110.00	0.80	88.00	ARCH
1368.002	01/22/2018	19	A	9	110.00	0.30	33.00	ARCH
1368.002	01/23/2018	1	A	9	400.00	0.20	80.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd 1368.002	01/24/2018	49	A	9	120.00	0.70	84.00 Research and obtain all cases and statutes that Wendy cites to as basis in her Counter-Petition including: Zastrow v Journal Communications Inc, Wells Fargo Bank v Superior Court, Taylor v Nationsbank Corp, Sierra v Williamson, BANK OF AMERICA NA a national association Plaintiff v Matthew LONG an individual, Bank of Nevada v Speirs, Barmettler v Reno Air Inc, Blue Chip Emerald v Allied Partners, NRS 30.030, NRS 30.040, NRS 153.031, NRS 156.070, NRS 163.100, NRS 163.110, NRS 163.115, NRS 164.005, NRS 164.015	ARCH
1368.002	01/24/2018	49	A	9	120.00	0.30	36.00 Review Wendy's counter-petition to understand the claims therein, which include breach of the trustee's fiduciary duty and request to remove trustee	ARCH
1368.002	01/24/2018	19	A	9	110.00	1.25	137.50 Review new binders of documents from client (1.5). Work on updating time line with new information (.5). Insert/update chart of Jaksick entities/trust (.5).	ARCH
1368.002	01/24/2018	1	A	9	400.00	0.70	280.00 Emails to and from Mark Connot and Don Lattin regarding sufficiency of pre-trial order (.4). Continue to review Wendy's accusations (.8). Schedule meeting with Todd (.2).	ARCH
1368.002	01/25/2018	44	A	9	250.00	1.50	375.00 446 FAMILY TRUST - Review counterpetition (0.75); meeting with client (0.75)	ARCH
1368.002	01/25/2018	1	A	9	400.00	1.70	680.00 446 - Continue review of documents and consolidated petition filed by Wendy. Telephone conference with Connot regarding extension of time. Continue to review pertinent documents raised in joint petition. Comprehensive status conference with client to go over Wendy's joint claims. Telephone conference with Don Lattin (3). Research possibilities of filing motion for summary judgment or motion to dismiss on statute of limitations.	ARCH
1368.002	01/26/2018	1	A	9	400.00	2.30	920.00 Receive and review in detail the amended objection and opposition filed by Stan regarding the subject Trusts (1.1). Analyze and evaluate applicable statutes of limitation for each claim for relief (1.3). Review, analyze, and evaluate impact of exhibits attached to Stan's objection/opposition to be consider for support on motion to dismiss and/or motions for summary judgment (2.2).	ARCH
1368.002	01/26/2018	19	A	9	110.00	0.50	55.00 (01/24/18) Update/revise Incline TSS and life insurance time line/indexes.	ARCH
1368.002	01/26/2018	19	A	9	110.00	1.00	110.00 (01/25/18) Conference with Kent Robison to review status (.2). Locate and print Sam Probate case docket and various pleadings (.5). Contact and communicate with forensic handwriting expert (.3).	ARCH
1368.002	01/26/2018	19	A	9	110.00	0.30	33.00 Multiple emails to and from expert Songer (handwriting) and telephone calls to arrange telephone conference with Kent Robison.	ARCH
1368.002	01/29/2018	44	A	9	250.00	1.50	375.00 review petitions and research re no context clause challenges	ARCH
1368.002	01/30/2018	44	A	9	250.00	2.00	500.00 Begin draft motion to dismiss	ARCH
1368.002	01/31/2018	44	A	9	250.00	0.50	125.00 Review re motion to dismiss for no contest (0.3); draft joint defense agreement (0.2)	ARCH
1368.002	01/31/2018	19	A	9	110.00	1.00	110.00 Prepare for and attend telephone conference with Kent Robison and expert Mark Songer (.5). Confirm Dr. Plasecki retention as expert (.2). Prepare and send documents/information to client (.3).	ARCH
1368.002	02/01/2018	44	A	9	250.00	0.25	62.50 Call with counsel for Trusts	ARCH
1368.002	02/01/2018	19	A	9	110.00	0.60	66.00 Review and respond to emails from Melissa Plasecki (.2). Locate and prepare documents/information for Kent Robison telephone conference with potential expert Mark Songer (.4).	ARCH
1368.002	02/05/2018	44	A	9	250.00	0.30	75.00 Review motion to dismiss	ARCH
1368.002	02/05/2018	19	A	9	110.00	0.20	22.00 Arrange appointment with Kent Robison and expert Dr. Plasecki.	ARCH
1368.002	02/07/2018	19	A	9	110.00	1.30	143.00 Review and respond to Mark Songer (expert) emails (.2). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend conference with expert Dr. Plasecki (.8).	ARCH
1368.002	02/09/2018	1	A	9	400.00	0.85	340.00 Review Don's motion to dismiss (.9). Work with Therese regarding Todd's motion to dismiss (.8).	ARCH
1368.002	02/09/2018	19	A	9	110.00	0.80	88.00 Conference with Kent Robison to review status (.2). Prepare draft retention letter to Dr. Plasecki (.3). Locate alternative handwriting expert (.3).	ARCH
1368.002	02/13/2018	44	A	9	250.00	1.00	250.00 Meeting with client	ARCH
1368.002	02/13/2018	19	A	9	110.00	2.00	220.00 Conference with Kent Robison to review case status (.3). Work on/update TSS Incline, life insurance and general time lines (.7). Locate and prepare documents/information/exhibits for motion (1.0).	ARCH

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Client ID 1368.002 Jaksick/Todd 1368.002	02/14/2018	1	A	9	400.00	1.75	700.00	ARCH
							Extensive interview with and conference with Todd Jaksick. Review Wendy's amended objections. Review Todd's binders, so that an appropriate designation could be made under NRCP 16.1. Review prenup issues with regarding to legitimacy and authenticity of required transfers. Review Stan's initial disclosures to determine what if any documents assist with motions on statutes of limitations and what if any documents augment the motion to dismiss on the no contest clause.	
1368.002	02/14/2018	19	A	9	110.00	3.30	363.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Research and contact handwriting experts (.3). Prepare for and attend conference with clients, Kent Robison and Therese Shanks (1.5). Prepare documents/information for initial disclosures (1.0).	
1368.002	02/15/2018	19	A	9	110.00	2.00	220.00	ARCH
							Work on draft initial disclosures (.5). Conference with Kent Robison to review and revise disclosures (.5). Begin review of documents to be produced (1.0).	
1368.002	02/16/2018	44	A	9	250.00	0.25	62.50	ARCH
1368.002	02/16/2018	19	A	9	110.00	2.60	286.00	ARCH
							Client meeting Review initial disclosures from Lattin (.3). Prepare for and attend strategy and status conference with Kent Robison and Therese Shanks (1.5). Work on detailed index of Jardon documents (.8).	
1368.002	02/16/2018	1	A	9	400.00	0.60	240.00	ARCH
1368.002	02/20/2018	19	A	9	110.00	1.60	176.00	ARCH
							Office meeting with Todd to review all documents. Continue with index of documents produced with our initial disclosures (1.3). Emails to and from handwriting expert (.3).	
1368.002	02/21/2018	19	A	9	110.00	0.50	55.00	ARCH
							Prepare our initial disclosure binders (.2). Review Stan's initial disclosures (.3).	
1368.002	02/22/2018	19	A	9	110.00	0.60	66.00	ARCH
							Work on detailed index of initial disclosures (.3). Locate new potential handwriting experts (.3).	
1368.002	02/23/2018	19	A	9	110.00	0.60	66.00	ARCH
							Update and revise indexes/time lines (.3). Locate and contact new handwriting experts (.3).	
1368.002	02/26/2018	19	A	9	110.00	1.60	176.00	ARCH
1368.002	02/27/2018	1	A	9	400.00	2.25	900.00	ARCH
							Review binder of emails from client (2,000 pages). Review Stan Jaksick's objection to determine whether clarification is needed by way of motion for more definite statement (.3). Review Stan's initial disclosures to determine whether a "challenge" can be discerned (.4). Discuss motion to dismiss with Don Lattin and review need to file answer to Stan's objection/position in light of him not providing an amendment (.4). Office conference with Todd to review production of documents, pending claims, ascertains and allegations and response to Wendy's objection/opposition to motion to dismiss (3.4).	
1368.002	02/27/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend conference with Kent Robison, Therese Shanks and client (1.2). Continue with review of client emails (.5).	
1368.002	02/27/2018	44	A	9	250.00	1.25	312.50	ARCH
1368.002	02/28/2018	19	A	9	110.00	2.10	231.00	ARCH
							Meeting with client Conference with Kent Robison to prepare chart of pleadings/motions filed (1.0). Work on detailed index of our document production (.5). Review latest filing by Wendy (.3). Locate and prepare documents/information for Kent Robison (3).	
1368.002	02/28/2018	44	A	9	250.00	2.30	575.00	ARCH
							Research re Charlson v. Hardesty (0.3); draft protective order (0.4); review transcript re status conference (0.6); draft status report (1)	
1368.002	03/01/2018	19	A	9	110.00	2.50	275.00	ARCH
							Work on revision of detailed document index of our disclosures (1.5). Locate additional information on handwritten experts (.5). Work on chart of all pleadings/motions (.5).	
1368.002	03/02/2018	1	A	9	400.00	0.30	120.00	ARCH
							Continue to review and outline distinctions between MCL's responsibility and our responsibility under Wendy's first amended counter-petition.	
1368.002	03/02/2018	19	A	9	110.00	1.00	110.00	ARCH
							Conference with Kent Robison to review status (.2). Work on revisions to chronological document index (.5). Compare initial document disclosures (.3).	
1368.002	03/05/2018	19	A	9	110.00	0.90	99.00	ARCH
							Conference with Kent Robison to review status (.3). Assist with documents/information for Kent Robison to prepare letters to Palmer/Wendy (.3). Work on revised file set-up (.3).	
1368.002	03/06/2018	1	A	9	400.00	2.05	820.00	ARCH
							Work on reply to Wendy's opposition to motion to dismiss (.6). Outline, analyze, and put on spreadsheet Wendy's causes of actions, transactions questioned, named defendants, pending motions, and list of pleadings (1.1). Meeting with Don Lattin and Carolyn	

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Client ID 1368.002 Jaksick/Todd								
1368.002	03/06/2018	19	A	9	110.00	2.90	319.00 Renner to discuss status conference strategies and how to deal with supplemental and amended "objections and responses" to motions to dismiss (2.4). Conference with Kent Robison to review assignments (.3). Work on chronological document index (.5). Locate and prepare documents/information for Kent Robison (.8). Prepare for and attend conference with Kent Robison, Therese Shanks, Lattin regarding preparation for hearing and case strategy (1.0). Prepare and send documents to expert (.3).	ARCH
1368.002	03/06/2018	44	A	9	250.00	1.90	475.00 Meeting re status conference (1.5); begin draft reply (0.4)	ARCH
1368.002	03/07/2018	1	A	9	400.00	1.05	420.00 Review transcript of previous status conference (.3). Confer with Don Lattin to obtain extensions of time in which to respond to Trustee's petitions in both cases (.3). Appear at and participate in status conference with Judge Hardy (1.1). Pre and post hearing strategy sessions with Todd Jaksick to review additional documents produced to refute Wendy's accusations (.4).	ARCH
1368.002	03/07/2018	19	A	9	110.00	1.80	198.00 Conferene with Kent Robison to review status and assignments (.2). Attend conference with Kent Robison and client (.8). Review new documents/information from client (.5). Begin index of documents to expert (.3).	ARCH
1368.002	03/07/2018	44	A	9	250.00	3.25	812.50 Draft reply ISO motion to dismiss	ARCH
1368.002	03/09/2018	1	A	9	400.00	0.70	280.00 Work on rough draft of interrogatories responsive to Wendy's amended counter-petition against Todd (.9). Research need to file responses to objections and oppositions (.3). Made rough draft of potential counter-petition against Stan should he make individual accusations against Todd on either Trust (.2).	ARCH
1368.002	03/09/2018	19	A	9	110.00	0.30	33.00 Locate and prepare documents/information for Kent Robison.	ARCH
1368.002	03/12/2018	1	A	9	400.00	2.10	840.00 Office conference with Todd Jaksick to review strategy for defending accusations concerning Lake Tahoe house. Work on organizing exhibits in chronological fashion that support all of Todd's defenses and outline the details of ownership and transactions relative to the Lake Tahoe House (3.3). Work on draft of request for production of documents and interrogatories regarding accusations and allegations in Wendy's amended counter-petition (.9).	ARCH
1368.002	03/12/2018	19	A	9	110.00	2.30	253.00 Conference with Kent Robison to review assignments (.3). Prepare for and attend conferene with Kent Robison, Therese Shanks and client (1.5). Assist with documents/information/exhibits for time line (.5).	ARCH
1368.002	03/12/2018	49	A	9	120.00	0.10	12.00 Meet with Kent Robison and discuss the discovery requests needed based off of Wendy's filings (split time with issue trust)	ARCH
1368.002	03/12/2018	49	A	9	120.00	1.00	120.00 Analyze Wendy's Opposition filing and Wendy's Objection filing to pull out information for discovery requests, and draft Requests for Production	ARCH
1368.002	03/12/2018	49	A	9	120.00	0.80	96.00 .4 Analyze Wendy's Answer for information to use for discovery requests; .4 Meet with Kent Robison to discuss and plan format and content of the Requests for Production	ARCH
1368.002	03/12/2018	44	A	9	250.00	1.50	375.00 Meeting with client	ARCH
1368.002	03/13/2018	1	A	9	400.00	1.70	680.00 Receive, analyze, evaluate and review Wendy Jaksick's initial disclosures (.4). Email to Connot regarding deficiencies in disclosure (.2). Respond to Connot's statement that documents do not have to be produced with draft of Todd's first request for production of documents, seeking production of all documents identified by Wendy in initial disclosures (.6). Work on second set of request for production of documents regarding responsive pleadings in issue trust, oppositions, objections, and answers (.3). Work on third set of RFP's regarding allegations and accusations in objection opposition and answer to petition in family trust matter (.3). Draft fourth set of request for production of documents addressing request to accusations in Wendy's amended counter-petition (1.6).	ARCH
1368.002	03/13/2018	1	A	9	400.00	0.40	160.00 Telephone conference with Todd regarding status and procedures with respect to document production and email search (.4). Telephone conference with Jeff Warner and process emails regarding Jeff's ability to obtain relevant and appropriate emails (.4).	ARCH
1368.002	03/13/2018	19	A	9	110.00	1.30	143.00 Conference with Kent Robison to review assignment (.3). Review Wendy disclosures (.5). Review	ARCH



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Client ID 1368.002 Jaksick/Todd								
1368.002	03/13/2018	49	A	9	120.00	0.30	36.00 documents/information from client to see if any documents from Wendy were in our binders (.5). Revise Requests for Production to include Answer information	ARCH
1368.002	03/13/2018	49	A	9	120.00	1.00	120.00 Analyze Wendy's Amended CounterPetition to pull out her allegations for a new set of Requests for Production (Time split with issue Trust)	ARCH
1368.002	03/13/2018	49	A	9	120.00	0.80	96.00 Draft Requests for Production set regarding Wendy's Amended CounterPetition (Time split with Issue Trust)	ARCH
1368.002	03/13/2018	49	A	9	120.00	0.30	36.00 Meet with Kent Robison regarding the Requests for Production; discuss the definitions to include in the requests (Time split with Issue Trust)	ARCH
1368.002	03/14/2018	19	A	9	110.00	1.30	143.00 Update/revise detailed document indexes (.5). Review new documents from client (.8).	ARCH
1368.002	03/14/2018	49	A	9	120.00	0.60	72.00 Draft and revise the Fourth Request for Production based on Wendy's Amended Counterclaim to include Kent Robison's comments from the 3/13 meeting (Time split with Issue Trust)	ARCH
1368.002	03/14/2018	49	A	9	120.00	0.30	36.00 Draft an additional request for production regarding Wendy's objections to the family trust	ARCH
1368.002	03/14/2018	49	A	9	120.00	0.10	12.00 Perform a final revision to the requests for production and send to Latin for his records (Time split with Issue Trust)	ARCH
1368.002	03/14/2018	44	A	9	250.00	1.50	375.00 Meeting with client	ARCH
1368.002	03/16/2018	49	A	9	120.00	0.30	36.00 Meeting with Kent Robison to review clients edits to Requests for Production and what to implement from client edits; discuss potential for a 5th request for production to Wendy based on the Opposition to Motion to Dismiss (time split with issue trust)	ARCH
1368.002	03/16/2018	1	A	9	400.00	1.00	400.00 (40%) Work on second, third, fourth, and fifth request for production of documents (1.7). Telephone conference with consultant (.3). Telephone conference with Todd regarding there is issues raised in pleadings and in opposition to motion to dismiss (.5).	ARCH
1368.002	03/17/2018	49	A	9	120.00	1.00	120.00 .5 Edit the Requests for Production using client and Kent Robison edits; .5 Analyze Wendy's Opposition to Motion to Dismiss and make list of topics not previously covered by other requests for a potential 5th request for production (Time split with Issue Trust)	ARCH
1368.002	03/19/2018	1	A	9	400.00	1.60	640.00 Telephone conference with all counsel, except Hosmer-Henner regarding need for confidentiality order (.2). Review suggested changes by Connot (.1). Incorporate changes. Review need for confidentiality order with client (.2). Office conference with Todd Jaksick regarding additional requests for production of documents (.4). Continue office conference with Todd Jaksick concerning need for additional documents from Nik Palmer (.3). Continue conference with Todd Jaksick to review list of documents identified by Connot and initial disclosures (.3). Continue office conference with client organizing Lake Tahoe documents chronologically for clearer depiction of evolution of title (.8). Telephone conference with Becky Rich at Tior to request Grantee/Grantor index and escrow documents, title documents regarding transfers of title to Lake Tahoe house (.9).	ARCH
1368.002	03/19/2018	19	A	9	110.00	1.20	132.00 Prepare for and attend status and strategy conference with Kent Robison, Therese Shanks and client.	ARCH
1368.002	03/19/2018	44	A	9	250.00	1.00	250.00 Client meeting	ARCH
1368.002	03/20/2018	19	A	9	110.00	0.50	55.00 Locate and print documents/information/exhibits for Tahoe time line (.5).	ARCH
1368.002	03/21/2018	19	A	9	110.00	0.80	88.00 Locate and prepare information on new handwriting experts (.3). Attend telephone conference with Kent Robison and exert (.5).	ARCH
1368.002	03/21/2018	49	A	9	120.00	0.20	24.00 Meeting with Kent Robison to discuss potential requests for production when Stan files his Counter petition; discuss preparations for Interrogatories to send to Wendy (Time split with issue trust)	ARCH
1368.002	03/21/2018	1	A	9	400.00	1.68	672.00 (40%) Office conference with Todd Jaksick to continue review of documents to be produced (1.3). Office conference with Jeff Warner to review word search protocol for Todd's emails and determination of programs and servers used to preserve email traffic (1.1). Continue to discuss and negotiate retention of consultant and further discuss documents needed by consultant for analysis of factual issues pertaining to case, included competence (1.8).	ARCH
1368.002	03/22/2018	19	A	9	110.00	0.80	88.00 Research and print Stan divorce docket (.3). Begin organization and index of TSS/Tahoe documents (.5).	ARCH

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<b>Client ID 1368.002 Jaksick/Todd</b>								
1368.002	03/26/2018	1	A	1	400.00	0.52	208.00 (40%) Evaluated Stan's objection/counter Petition (.7). Start draft of RFPs to specific accusations (.6).	ARCH
1368.002	03/26/2018	44	A	9	250.00	1.50	375.00 Review Stan objection and counterpetition (1); research re deceptive trade practices applying to trust administration matters (0.5)	ARCH
1368.002	03/26/2018	19	A	9	110.00	1.30	143.00 Review and index documents (.5). Review client's time line and incorporate into ours (.5). Review Wendy disclosures (.3).	ARCH
1368.002	03/27/2018	49	A	9	120.00	0.30	36.00 Create document for interrogatories to send to Wendy and begin drafting interrogatories. (time split between trusts)	ARCH
1368.002	03/27/2018	19	A	9	110.00	2.10	231.00 Access documents from Wendy, disclosures and begin index and comparison (1.8). Telephone conference with Kent Robison to review status (.3).	ARCH
1368.002	03/28/2018	49	A	9	120.00	1.00	120.00 analyze Stan's amended objection regarding the family trust to prepare to draft discovery requests.	ARCH
1368.002	03/28/2018	44	A	9	250.00	0.50	125.00 Begin draft answer to Wendy's counterpetition	ARCH
1368.002	03/28/2018	19	A	9	110.00	1.80	198.00 Continue with review of Wendy and Stan disclosures, indexing and comparison to our document disclosures (1.0). Work on indexing/organization of Trust document production (.8).	ARCH
1368.002	03/29/2018	19	A	9	110.00	1.80	198.00 Review, index and reconcile Trust document disclosures with our disclosures (1.0). Review, organize and compare documents from client to documents produced by Wendy and Stan (.8).	ARCH
1368.002	03/30/2018	49	A	9	120.00	1.40	168.00 Draft requests for production regarding stan's amended objection and counter petition in the family trust.	ARCH
1368.002	03/30/2018	19	A	9	110.00	1.00	110.00 Update/revise index of Petitioner's disclosures (1.0).	ARCH
1368.002	04/02/2018	1	A	9	400.00	0.66	264.00 (370%) Continue work on Request For Production of documents to Stan Jaksick regarding Family Trust (1.1) (30%) Draft more interrogatories and proof read and changed in order to include more specificity (1.1)	ARCH
1368.002	04/02/2018	49	A	9	120.00	0.40	48.00 Finalize both requests for production regarding Stan. Time is split between both trusts.	ARCH
1368.002	04/02/2018	49	A	9	120.00	1.10	132.00 Phone call with Kent Robison regarding interrogatories to Wendy. (.2) Draft interrogatories for Wendy. (.9) (Time is split between trusts)	ARCH
1368.002	04/03/2018	1	A	9	400.00	0.60	240.00 Telephone conference with Don to work on motion to dismiss and allocate duties.	ARCH
1368.002	04/03/2018	1	A	9	400.00	0.60	240.00 Work on study and outlining of Stan's petition and objections.	ARCH
1368.002	04/03/2018	44	A	9	250.00	2.50	625.00 Convert motion to dismiss for family trust into motion to dismiss for issue trust and add all issue trust arguments (2); edit (0.5)	ARCH
1368.002	04/03/2018	19	A	9	110.00	0.30	33.00 Locate, prepare and send documents/information to Kent Robison.	ARCH
1368.002	04/04/2018	1	A	9	400.00	0.55	220.00 Conference with Todd. Work on underlying conflict issues. Continued work on discovery requests on both.	ARCH
1368.002	04/04/2018	44	A	9	250.00	1.00	250.00 Draft answer to Wendy Counterpetition	ARCH
1368.002	04/05/2018	49	A	9	120.00	0.30	36.00 Teleconference with Kent Robison to go over discovery requests including joint request with Don Lattin to Stan and Wendy, and how those should be formatted. (Time split between trusts)	ARCH
1368.002	04/05/2018	49	A	9	120.00	0.90	108.00 Draft request for production to Stan regarding both the issue trust in the family trust. (Time split between trusts)	ARCH
1368.002	04/05/2018	44	A	9	250.00	0.25	62.50 Call with client	ARCH
1368.002	04/06/2018	49	A	9	120.00	0.20	24.00 Implement Kent Robison's edits and suggestions into the First Set of Interrogatories to Wendy. (Time split between both trusts)	ARCH
1368.002	04/06/2018	44	A	9	250.00	0.60	150.00 Meet with client	ARCH
1368.002	04/08/2018	1	A	9	400.00	1.20	480.00 Work on objections and answer to Wendy's counter petition to include affirmative defenses, mitigation, third party causation, Wendy's breach of good faith, spoliation, comparative negligence, breach of duties, justifiable reliance, fraud as an affirmative defense, co-trustee's can't co-conspire similar to employees of corporation and reasonable reliance of counsel (1.5). Conduct research of elements concerning each new affirmative defense added to answer (.9).	ARCH
1368.002	04/09/2018	1	A	9	400.00	0.80	320.00 Review, corrected, and added to motion to dismiss regarding family (.2). Review applicability of exhibits to motion to dismiss on issue trust (.2). Telephone conference with James Green regarding timing of exemplars (.4). Draft additional interrogatories concerning Wendy's background, involvement with Sam and interaction with Stanley to add additional 20 interrogatories (.8).	ARCH
1368.002	04/09/2018	49	A	9	120.00	0.50	60.00 Meeting with Kent, Therese, and Jim on the Motion to Dismiss and Stan's RFP's regarding the family trust.	ARCH
1368.002	04/09/2018	49	A	9	120.00	0.20	24.00 Meeting with Kent Robison to go over Wendy's	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	04/09/2018	44	A	9	250.00	0.50	125.00 Interrogatories and discuss things to be added (Time split between trusts)	ARCH
1368.002	04/09/2018	19	A	9	110.00	1.50	165.00 Review outstanding discovery/briefing/ issues to be addressed while motion to dismiss pending	ARCH
1368.002	04/10/2018	49	A	9	120.00	0.50	60.00 Attend conference with Kent Robison, Therese Shanks, Lindsay Liddell to review status and assignments (1.0). Assist with documents/information for draft discovery to Wendy (.5).	ARCH
1368.002	04/10/2018	19	A	9	110.00	0.80	88.00 Draft additional interrogatories for Wendy. (Time split between trusts)	ARCH
1368.002	04/12/2018	1	A	9	400.00	0.40	160.00 Conference with Kent Robison to review status (.3). Work on binder of documents/information for Kent Robison (.5)	ARCH
1368.002	04/16/2018	19	A	9	110.00	2.10	231.00 Draft additional requests for production of documents to the ones already drafted (.3). Review outline and chronology with attached exhibits provided by client regarding conduct pursued as Trustee for issue Trust (.1).	ARCH
1368.002	04/17/2018	49	A	9	120.00	0.30	36.00 Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison document binder (.8). Update all document production indexes and work on detailed working versions of same (.8).	ARCH
1368.002	04/17/2018	49	A	9	120.00	0.40	48.00 Meeting with Kent Robison on Wendy Interrogatories (Time split between trusts)	ARCH
1368.002	04/17/2018	19	A	9	110.00	2.30	253.00 Draft additional interrogatories to send to Wendy based on meeting with Kent Robison and Client's edits/ suggestions (Time split between trusts)	ARCH
1368.002	04/18/2018	49	A	9	120.00	0.70	84.00 Conference with Kent Robison to review assignments (.3). Review and revise detailed index of Wendy documents (1.0). Prepare documents from client to be produced (1.0).	ARCH
1368.002	04/18/2018	1	A	9	400.00	2.90	1,160.00 Meeting with client to go over Interrogatories to Wendy (Time split between trusts)	ARCH
1368.002	04/18/2018	19	A	9	110.00	2.40	264.00 Office conference with Todd Jaksick to review additional interrogatories request by client (1.6). Redraft last interrogatories to accommodate client's request (.4). Research documents provided regarding Stan's obligations to Family Trust as a result of diverting funds from the sale of Bronco Billy's to Montreux Golf, Montreux Development, Lakeridge, and/or Montreux Land (.9).	ARCH
1368.002	04/19/2018	49	A	9	120.00	1.40	168.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for client meeting (.3). Attend conference with client, Kent Robison, Lindsay Liddell (1.0). Locate and prepare documents/information for Kent Robison (.5). Copy, prepare and send documents to client (.3).	ARCH
1368.002	04/19/2018	49	A	9	120.00	0.20	24.00 Research NRS 86 as basis for letter requesting corporation documents from Stan (.2) Meet with Kent Robison about Wendy's Interrogatories and what to remove to meet court ordered limit (.2) Revise Wendy's Interrogatories to meet limit of 60, send draft to client and Kent (.3) Meeting with Kent Robison on the letter to Stand regarding Montreux related documents, phone call with client (.7) (Time split between trusts)	ARCH
1368.002	04/19/2018	1	A	9	400.00	0.50	200.00 Implement edits and suggestions into Stan's Family Trust Request for Production per meeting with Kent Robison	ARCH
1368.002	04/19/2018	1	A	9	400.00	0.90	360.00 Telephone conference with Todd to include additional reworded interrogatories to Wendy regarding her claims on both trusts.	ARCH
1368.002	04/19/2018	19	A	9	110.00	1.00	110.00 Review legislation allowing access to records for shareholders and members of limited liability company (.3). Review Secretary of State records regarding Montreux Development, Montreux Holdings, Montreux Golf Club, Lakeridge, and Toiyabe Investments (.2). Draft affidavit for Todd (.4), draft Power of Attorney for Todd (.3), draft demand letter to Stanley's counsel (.6).	ARCH
1368.002	04/20/2018	49	A	9	120.00	0.90	108.00 Locate and prepare documents/information for Kent Robison and review same (.5). Print PG sale documents from Trust production (.5).	ARCH
							Respond to client emails and revise Wendy Interrogatories accordingly (.2) Meeting with Kent Robison to go over client emails on new LLCs and trusts to include in letter and possible Request for Production to Stan (.3) Perform final revisions to Wendy Interrogatories, renumber and perform a final read through before sending to Don Lattin (.4) (Time	

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Client ID 1368.002 Jaksick/Todd								
1368.002	04/20/2018	1	A	9	400.00	1.85	740.00	ARCH
							split between trusts) Research document production requirements under limited liability statutory mandates (.4). Research statute and cases regarding requirements for production of corporate records for shareholders (.5). Draft affidavit (.4). Draft Power of Attorney (.3). Prepare letter demand to Stanley's counsel (1.3). Research Secretary of State records for Corporations and LLCs managed by Stan in which Todd has interest for status and confirmation that Stan is Director or Manager (.8).	
1368.002	04/20/2018	19	A	9	110.00	1.00	110.00	ARCH
							Conference with Kent Robison to review status and assignments (.2). Locate, prepare and send documents/information to client (.3). Work on potential documents to be produced (.5).	
1368.002	04/23/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review assignments (.3). Update document binders and indexes (.8). Organize documents fro Trust (1.5 K pages) (1.0). Begin location and preparation of potential Wendy deposition exhibits (.5).	
1368.002	04/24/2018	44	A	9	250.00	3.50	875.00	ARCH
							Client meeting (1); review stan opposition to motion to dismiss (0.5); outline potential argument (0.25); legislative history research re NRS 41.600 and NRS Chapter 598 (1.25); draft status conference statement (0.5)	
1368.002	04/24/2018	1	A	9	400.00	1.20	480.00	ARCH
							Continue to work on statutory demand letters under and pursuant to NRS 78.257 and NRS 86.241(6). Office conference with Jessica and Todd regarding formation, operation development and respective holdings of Jaksick Family Trust LLC, Montreux Development Group LLC, Montreux Golf Club Ltd., Lakeridge Golf Course Ltd., Montreux Golf Club Holding Company LLC, and Tolyabe Investment Company. Work on redraft of request for production of documents regarding those companies and documents needed in discovery. Made modifications to Limited Power of Attorney and to affidavit required by NRS 78.257(3). Work on flow chart for Todd and Jessica concerning accusations made by Wendy and Stan on Issue Trust and Stan on Family Trust for clients' ability to organize documents and defenses accordingly.	
1368.002	04/24/2018	19	A	9	110.00	2.30	253.00	ARCH
							Review and organize 1.5K pages of Trust documents for binders (1.0). Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison for client meeting (.3). Review Wendy supplemental document disclosure and compare to prior discovery (.8).	
1368.002	04/25/2018	44	A	9	250.00	0.75	187.50	ARCH
1368.002	04/25/2018	19	A	9	110.00	2.00	220.00	ARCH
							Finish legislative history research Conference with Kent Robison to review status and assignments (.2). Continue with review and organization of Trust documents (1.0). Locate and copy potential documents/information/exhibits for Wendy deposition (.8).	
1368.002	04/25/2018	1	A	9	400.00	2.20	880.00	ARCH
							Work on statutory demand letters to make document request more specific (.2). Redraft and correct Todd's Limited Power of Attorney in support of document request (.9). Revise Todd's affidavit of good faith to comply with Chapter 78 (.4). Draft request for production of documents requesting documents subject of the letter demands (1.1). Office conference with Todd Jaksick to prepare for status conference (.4). Debrief with Don Lattin, Todd Jaksick, and Therese regarding attorney/client privilege with regard to emails Stan sent to Wendy (1.4).	
1368.002	04/26/2018	1	A	9	400.00	2.20	880.00	ARCH
							(40%) Statement for court (.6). Record demand letter revised and finalized (.8). Prepared for hearing (.5). RFPs drafted for companies controlled by Stanley (.9). Flow chart for Wendy's claims prepared for client (.7). Conference with Don regarding privilege issues (1.1). Work on motion to terminate Stan's position as trustee (.9).	
1368.002	04/26/2018	19	A	9	110.00	2.90	319.00	ARCH
							Locate, copy and prepare documents/information/exhibits for Wendy deposition (1.0). Assist with documents/information for charts for clients regarding claims and damages (1.0). Locate and prepare documents/information for Kent Robison and Therese Shanks (.3). Attend conference with Kent Robison and Therese Shanks (.3). Locate and prepare documents/information for hearing (.3).	
1368.002	04/26/2018	44	A	9	250.00	2.25	562.50	ARCH
							Outline reply (1.5); prepare for and attend status	

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Client ID 1368.002 Jaksick/Todd								
1368.002	04/27/2018	19	A	9	110.00	1.30	143.00	ARCH
							conference (0.5); meeting with client (0.25)	
1368.002	04/30/2018	19	A	9	110.00	1.30	143.00	ARCH
							Conference with Kent Robison to review Status (.3). Organize and review documents from client for possible production (1.0).	
1368.002	05/01/2018	19	A	9	110.00	2.80	308.00	ARCH
							Continue with index and organization of all client documents for possible production (.8). Begin review of Wendy discovery responses and documents (.5).	
1368.002	05/02/2018	19	A	1	110.00	2.90	319.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Continue with review of Wendy document production (1.0). Transfer Wendy documents to system (.3). Prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.002	05/03/2018	1	A	9	400.00	0.30	120.00	ARCH
							Conference with Kent Robison to review case status and assignments (.3). Continue with review and assembly of client emails for production (1.3). Continue with review of Wendy documents (12,000 pages) (1.3).	
1368.002	05/03/2018	19	A	9	110.00	1.50	165.00	ARCH
							Receive and continue to review documents produced by Wendy. Review documents sent by Don Lattin evidencing collusion between Wendy and Stan. Research implications of Stan's conduct against Todd while Todd still serving as Trust to Stan as a beneficiary in the Issue Trust.	
1368.002	05/04/2018	1	A	9	400.00	2.10	840.00	ARCH
							Continued review of documents provided by Wendy showing collusion between Stan and Wendy (1.3). Office conference with Todd and Jessica to review documents and separate into House, CPAs, Indemnity Agreements and General documents showing collusion (2.9)	
1368.002	05/04/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status (.3). Continue with review and organization of Wendy documents (12,000 pages) (2.5).	
1368.002	05/07/2018	1	A	9	400.00	0.70	280.00	ARCH
							Telephone conference with Don Lattin regarding discovery issues to be argued on May 8th. Receive Wendy's opposition to petitioners' motion to return privilege material. Continue work on document organization and retrieval based upon new documents provided by Wendy.	
1368.002	05/07/2018	19	A	9	110.00	4.00	440.00	ARCH
							Continue with review and organization of Wendy documents (12,000 pages) (3.5). Begin dictation of detailed document index (.5).	
1368.002	05/08/2018	1	A	9	400.00	2.20	880.00	ARCH
							Prepare for hearing on discovery issues regarding attorney/client privilege associated with Stan's emails to Wendy (.5). Telephonic appearance at hearing on motion to discourage confidential attorney/client privilege documents (.6). Receive additional documents from Wendy's counsel showing more communications from Stan to Wendy about attorney advise and comments (.3). Office meeting with Don Lattin, Carolyn Renner, Jim, Therese, Todd, Jessica regarding attorney/client privilege production strategy on deposition schedule, review of document retrieval process and allocation of duties with respect to pending discovery issues.	
1368.002	05/08/2018	19	A	9	110.00	4.10	451.00	ARCH
							Conference with Kent Robison to review case status and assignments (.5). Continue with review of 12,000 pages of Wendy documents (1.3). Prepare for and attend status conference with Kent Robison, Therese Shanks, Don Lattin and clients (1.5). Locate and prepare documents/information for Kent Robison (.8).	
1368.002	05/08/2018	44	A	9	250.00	1.00	250.00	ARCH
							meeting with client	
1368.002	05/09/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.8). Continue with review of Wendy documents (1.0). Prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.002	05/10/2018	19	A	9	110.00	3.80	418.00	ARCH
							Continue with review and organization of Wendy documents (1.3). Multiple conferences with Kent Robison to review assignments (.5). Review documents/information from clients for production (1.0). Locate and prepare documents/information/exhibits for upcoming depositions (1.0).	
1368.002	05/11/2018	19	A	9	110.00	2.50	275.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Arrange for duplication of extra ACPA USB drive (.3). Work on detailed index of Wendy documents (1.0). Work on documents/information/exhibits for upcoming depositions (1.0).	
1368.002	05/14/2018	19	A	9	110.00	3.50	385.00	ARCH
							Work on detailed index of Wendy documents (1.0). Locate and prepare documents/information/exhibits for	

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Client ID 1368.002 Jaksick/Todd								
1368.002	05/14/2018	1	A	9	400.00	2.20	880.00	ARCH
upcoming depositions (1.5). Work on draft supplemental document production (.5). Begin review of ACPA documents (.5). Work with Jim Stewart on packaging "Tahoe documents" for production. Review McGoy and Hascheff communications to determine whether they are privileged. Review and analyze the following for production and use of exhibits at deposition and trial: premarital agreement, schedule A to Family Trust, Deeds transferring Tahoe to and from Sam, appraisal, option, restraining order regarding Stan for molestation and violence, divorce proceeding docket, MOA regarding option, option payment, Deed to SSJ, extension for option payment, management agreement, second option agreement, Sam's notes regarding \$9.5 million, next listing agreement, next Pierre's letter to Riley, amended assignment of option, proposal to Erickson, Deat's email, Sam's notes, notarization documents regarding second amendment, residual lease, durable power, notice of exercise, unsecured note, deed to TSS, rental agreement, texts regarding Tahoe discussions, and life insurance money, CPA regarding insurance proceeds, Wendy's admission of delivery of binder, Kimmel appraisal, Todd's and Stan's texts about how Stan will pay, Wendy's texts regarding talking to accountants and attorneys, Wendy's texts acknowledging how Tahoe is not in Sam's estate and that Todd's ownership is different than hers, text email showing Stan's involvement in listing property, Stan's email regarding Montreaux use of buy-in on Tahoe.								
1368.002	05/15/2018	1	A	9	400.00	2.60	1,040.00	ARCH
Review, analysis, organize, and summarize exhibits pertaining to indemnification and contribution agreement, mainly. Continue review of Tahoe documents for use at trial, including the following documents: Lexi's signature on buy-in documents, Wendy's support of Stan's buy-in, Wendy's signature on ACPA, email from Stan regarding payment, amended note, pledge agreement, emails to BofA, refinance applications, BofA's approval, Todd's personal guarantee, BofA refinance statement, efforts to get Stan's guarantee, Kreitlin's counter, Sam's email regarding losing TSS file, capital call to TSS, email to Wendy regarding need to resolve Stan's buy-in, comparison chart regarding Stan's renegotiated efforts to buy-in, emails to Wendy regarding Kreitlin's proposed buy-in, Stan's emails attempting to finalize, personal guarantee for Stan with discount analysis, emails to Stan regarding counter being unacceptable, Stan's email regarding ownership proportionite to 235k he invested.								
1368.002	05/15/2018	19	A	9	110.00	2.70	297.00	ARCH
Conference with Kent Robison to review assignments (.2). Locate and print documents/information for Kent Robison (.5). Work on organization of Wendy document production (1.0). Work on location, preparation and organization of documents/information/exhibits for depositions (1.0).								
1368.002	05/16/2018	19	A	9	110.00	4.00	440.00	ARCH
Conference with Kent Robison to review status and assignments (.5). Review and prepare Tahoe documents from client for production (1.0). Review ACPA document disk from client and remove potential privileged documents (1.5). Work on documents/information/exhibits for depositions (1.0).								
1368.002	05/17/2018	1	A	9	400.00	1.30	520.00	ARCH
Meet with Jim to organize documents provided by clients into respective binders for evidence on each issue raised (.6). Met with client to prepare statutory demands, RFPs, 30(b)(6) topics regarding companies operated by Stan (1.2). Telephone conference with Don Lattin reviewing positions to take on upcoming discovery disputes (.8).								
1368.002	05/17/2018	19	A	9	110.00	4.60	506.00	ARCH
Conference with Kent Robison to review status and assignments (.5). Prepare for and attend client conference with Kent Robison (2.8). Locate and prepare documents/information for Kent Robison (.3). Review indemnity documents disk from client (.5). Review and prepare documents/information/exhibits for depositions (.5).								
1368.002	05/18/2018	19	A	9	110.00	1.50	165.00	ARCH
Locate and prepare documents/information/exhibits for upcoming depositions (1.0). Telephone conference with Caroline Reinner (MCL) and locate documents/information (.5).								

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Client ID 1368.002 Jaksick/Todd									
1368.002	05/19/2018	19	A	9	110.00	3.60	396.00	Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for upcoming depositions (1.3). Review Wendy exhibits with Kent Robison (1.5). Locate and prepare additional exhibits per Kent Robison (.5).	ARCH
1368.002	05/21/2018	1	A	9	400.00	1.10	440.00	Work on preparing for Wendy's deposition. Review documents produced to select deposition exhibits. Help organize Todd's documents into specific binders for depositions.	ARCH
1368.002	05/22/2018	19	A	9	110.00	4.30	473.00	Conference with Kent Robison to review case status and assignments (.8). Continue with review and organization of documents from client for possible disclosure (2.0). Locate and prepare documents/information for Kent Robison (1.5).	ARCH
1368.002	05/23/2018	19	A	9	110.00	4.80	528.00	Multiple conferences with Kent Robison to review case status and assignments (1.0). Locate, review and prepare documents/information/exhibits for upcoming depositions (2.0). Locate, review and prepare documents/information for 16.1 supplemental disclosure (1.8).	ARCH
1368.002	05/24/2018	1	A	9	400.00	1.80	720.00	Prepare agenda for meeting with client. Prepare outline and analysis of eight binders of evidence for accusations concerning Tahoe, indemnification, second amended trust, ACPA's cattle accusations, super cub accusations, and evidence showing collusion and conspiracy between Stan and Wendy to falsely accuse Todd of misconduct. Help Jim organize pleading files for Wendy's counter-petition, Stan's petition regarding Family Trust and Stan's petition regarding Issue Trust. Prepare list of tasks to be completed within the next week. Telephone conference Don Lattin regarding strategy meeting. Respond to Stan's letter regarding 30(b)(6) depositions. Commence overview of available counter-claims to be filed in each trust case against Stan. Commence work on motion for order to compel discovery.	ARCH
1368.002	05/24/2018	19	A	9	110.00	5.40	594.00	Multiple conferences with Kent Robison to review assignments (.3). Prepare for and attend conference with Kent Robison, Therese Shanks and client (2.0). Locate and prepare documents/information for Kent Robison and Therese Shanks (.5). Locate and prepare documents for disclosure (1.0). Work on deposition exhibits (.8). Begin review of new documents from client (.8).	ARCH
1368.002	05/24/2018	44	A	9	250.00	5.10	1,275.00	Meeting with client (1.1); research re 30(b)(6) (0.4); begin draft petition for family trust (3.6)	ARCH
1368.002	05/25/2018	19	A	9	110.00	3.10	341.00	Conference with Kent Robison to review deposition exhibits (.8). Locate and prepare documents/information for Kent Robison (.5). Review new documents from client (1.5). Prepare and send documents for duplication (.3).	ARCH
1368.002	05/25/2018	44	A	9	250.00	3.40	850.00	Meet and confer (0.2); draft status conference p&a (0.2); draft petition (3)	ARCH
1368.002	05/25/2018	1	A	9	400.00	1.60	640.00	Office conference with client to review client's proposed deposition questions of Wendy Jaksick. Topics discussed included accusations that Janene killed Sam, Todd killed Sam, Wendy's troubles with the law - both criminal and civil. Review documents 403, 409, 405, 412, 413, 11, 975, 2253, 2450 through 2461, 2419. Continue to review documents produced by Todd concerning Supercub and Duck Lake Ranch note and prepare deposition package for 19 Series, including documents 1799, 1812, 1897, and 1896. Participate in meet and confer with counsel and finalize and serve NRCP 30(b)(6) notices for Jaksick Family LLC, Lakeridge Golf Course, Toiyabe, Montreaux Golf Club, Montreaux Golf Club Holding, and Montreaux Development Group.	ARCH
1368.002	05/28/2018	1	A	9	400.00	0.85	340.00	(50%) Receive and review Wendy's responses to Don's request for production of documents (.9). Telephone conference with Don regarding significance and relevance of documents produced (.8).	ARCH
1368.002	05/29/2018	19	A	9	110.00	4.80	528.00	Review, organize and prepare documents, information, exhibits for upcoming depositions (2.0). Review, organize and prepare documents/information for next 16.1 Supplemental Disclosure (2.0). Work on Kent Robison documents binders (.8).	ARCH
1368.002	05/29/2018	44	A	9	250.00	1.20	300.00	Continue Drafting petition	ARCH
1368.002	05/29/2018	1	A	9	400.00	0.90	360.00	(50%) Work on scheduling hearing with Judge Hardy and Commissioner Ayres regarding discovery disputes.	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	05/30/2018	19	A	9	110.00	5.60	616.00	ARCH
							Receive letter regarding refusal and problems with Stanley Jaksick producing corporate documents pursuant to statutory demand. Telephone conference with Don regarding next step with regarding to corporate documents.	
1368.002	05/30/2018	44	A	9	250.00	2.50	625.00	ARCH
1368.002	05/30/2018	44	A	9	250.00	2.25	562.50	ARCH
1368.002	05/30/2018	1	A	9	400.00	1.10	440.00	ARCH
							Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents, information and exhibits for upcoming depositions (2.0). Prepare for and attend conference with Kent Robison, Don Lattin and client (1.8). Locate and prepare documents and information for next 16.1 Supplemental Disclosures (1.0).	
1368.002	05/31/2018	19	A	9	110.00	5.60	616.00	ARCH
							finish draft family petition (1.5); begin edits to family petition (1)	
1368.002	05/31/2018	44	A	9	250.00	0.20	50.00	ARCH
1368.002	06/01/2018	19	A	9	110.00	2.60	286.00	ARCH
1368.002	06/01/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	06/01/2018	1	A	9	400.00	2.35	940.00	ARCH
							Meeting with client and co-counsel (1.25); draft status conference report (1); (50%) Office conference with Todd Jaksick and Don Lattin to review production of documents produced by Jessica after her review and production of documents from file cabinet. Work on discovery planning and preparation for meeting with Commissioner Ayres.	
							Multiple conferences with Kent Robison to review case status (1.0). Locate and organize and prepare documents, information and exhibits for Wendy's Deposition (2.5). Review documents, information and exhibits with Kent Robison (.8). Telephone conferences with clients, prepare and send documents and information (.3). Work on documents and information for 16.1 disclosure (1.0).	
							Emails re Montreux Golf Club	
							Conference with Kent Robison to review documents, information and exhibits for Wendy deposition (1.3). Locate and prepare additional documents, information and exhibits per Kent Robison (1.3).	
							meeting with client	
							(50%) Telephone conference with expert with regard to documents needed, timing of discovery, discovery cut-off, and retention as consultant (.9). Prepare status conference statement for Todd as individual for June 4th hearing (1.1). Office conference with Todd Jaksick to obtain documents responsive to discovery requests and to prepare for additional documents and outlines concerning each category of counter-petitions (1.9). Review Supercub issues and ACPA with Todd, review cattle issue with Todd in light of ACPA (.8).	
1368.002	06/02/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.002	06/03/2018	1	A	9	400.00	1.60	640.00	ARCH
							begin review of Wendy RFP	
							Review and assemble exhibits 1 - 25 to be used at deposition of Wendy Jaksick (1.8). Read and highlighted significant contents of each exhibit to be used (1.4).	
1368.002	06/04/2018	19	A	9	110.00	5.80	638.00	ARCH
							Multiple conferences with Kent Robison to review documents, information and exhibits for Wendy deposition (2.0). Locate and prepare documents and information for Kent Robison (1.0). Attend conference with Kent Robison, Don Lattin, and client (.5). Review client emails and prepare documents and information for deposition.	
1368.002	06/04/2018	44	A	9	250.00	2.40	600.00	ARCH
1368.002	06/04/2018	1	A	9	400.00	4.50	1,800.00	ARCH
							Finish review of RFP (1.4); draft memo re division of labor and potential objections (1)	
							(50%) Morning meeting with Todd to review tactics for commencing Wendy's deposition and review of exhibit 1 & 2 to get clarity (1.2). Took deposition of Wendy Jaksick covering issues related to both Family Trust and Issue Trust (6.7). Strategy conferences and debriefing with Don and Todd (1.1).	
1368.002	06/05/2018	1	A	9	400.00	3.65	1,460.00	ARCH
							(50%) Review additional exhibits to be used at Wendy's continued deposition, including judgments and criminal charges (.9). Continue taking deposition of Wendy Jaksick (6.4).	
1368.002	06/06/2018	19	A	9	110.00	4.30	473.00	ARCH
							Multiple conferences with Kent Robison to prepare and review documents, information and exhibits for Wendy deposition (2.0). Locate and prepare documents, information and exhibits from client (1.0). Attend conferences with Kent Robison and client (.3)	
1368.002	06/06/2018	44	A	9	250.00	1.25	312.50	ARCH
1368.002	06/06/2018	1	A	9	400.00	2.80	1,120.00	ARCH
							Meeting with client (0.5); attend Wendy's deposition (0.75)	
							(50%) Pre-deposition conference with Don and Todd regarding time allocation for remaining period of time for Wendy's deposition and joint review of additional exhibits consisting of email traffic and texts (1.0).	



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Client ID 1368.002 Jaksick/Todd								
1368.002	06/07/2018	19	A	9	110.00	2.50	275.00	ARCH
							Continue taking deposition of Wendy Jaksick concerning both Family & Issue Trust allegations (4.1). Debrief with Don and Todd regarding Don's examination of Wendy (.5).	
1368.002	06/08/2018	44	A	9	250.00	2.25	562.50	ARCH
1368.002	06/08/2018	1	A	9	400.00	2.30	920.00	ARCH
							Conference with Kent Robison to review status (.5). Organize and begin index of deposition exhibits (1.0). Locate and prepare documents/information for Kent Robison (1.0).	
							meeting with client (0.75); edit proposed petition (1.5) (50%) Participate in discovery conference with counsel to arrange and schedule pending discovery and deposition (1.1). Prepare for meeting with Pierre Hascheff by reviewing letters and documents Pierre authored, received, or prepared (.8). Meeting with Pierre Hascheff and Don Lattin to discuss thoroughly the involvement, thoughts, and opinions with Pierre with indemnification and Lake Tahoe issues (2.7).	
1368.002	06/13/2018	44	A	9	250.00	0.70	175.00	ARCH
1368.002	06/14/2018	1	A	9	400.00	1.70	680.00	ARCH
							Outline discovery commissioner statement (0.5); meet and confer re Wendy requests (0.2) (50%) Review status conference statements filed by other parties in preparation for discovery conference with Commissioner Ayres (.4). Pre-conference discussion with Don Lattin (.4). Attend discovery conference with parties and Commissioner Ayres to argue motions and get reading from Commissioner Ayres on perspective discovery rulings (2.6).	
1368.002	06/18/2018	19	A	9	110.00	3.40	374.00	ARCH
							Review request for production of documents (2.0). Telephone conference with Kent Robison (.2). Attend telephone conference with Kent Robison and Therese Shanks (.2). Work on deposition exhibit index (.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	06/19/2018	49	A	9	120.00	0.10	12.00	ARCH
							Meeting with Kent Robison regarding the RFP to Todd, need to redact attorney client privileged info from the various firm bills (Time split)	
1368.002	06/19/2018	49	A	9	120.00	1.40	168.00	ARCH
1368.002	06/19/2018	19	A	9	110.00	4.20	462.00	ARCH
							Begin redacting privileged information from the firm's bill location and assembly of responsive documents already produced (2.0). Conference with Kent Robison to review status (.3). Attend conference with Kent Robison and Therese Shanks (.8). Attend conference with Kent Robison and clients (.8). Locate and prepare documents/information for Kent Robison (.3).	
1368.002	06/19/2018	44	A	9	250.00	1.40	350.00	ARCH
1368.002	06/19/2018	1	A	9	400.00	1.90	760.00	ARCH
							meeting re RFP (0.4); meeting with client (1) Met with Todd to review documents pertinent to his individual status as it pertains to Wendy's four sets of Request for Production of Documents and work on list of documents to be produced in response to those RFPs.	
1368.002	06/20/2018	49	A	9	120.00	0.50	60.00	ARCH
1368.002	06/20/2018	49	A	9	120.00	1.00	120.00	ARCH
							Continue redacting attorney bill to ensure no attorney client privileged information is on the bill Continue redacting attorney bills, ensure that any reference to work product including charts and indexes are redacted, references to experts or consultants are redacted	
1368.002	06/20/2018	19	A	9	110.00	4.30	473.00	ARCH
							Conference with Kent Robison to review status and assignments (.8). Review request for production of documents and continue with location and assembly of responsive documents/information (3.0). Locate, prepare and send documents/information to handwriting expert Green (.5).	
1368.002	06/20/2018	1	A	9	400.00	1.45	580.00	ARCH
							(50%) Work on structuring the 30(b)(6) depositions and allocating responsibility for companies (.8). Schedule and subpoena 30(b)(6)/records deposition deponents for companies managed by Stan (.4). Work on review of bills to determine whether bills contain work product and attorney/client communications to determine whether any should be produced in response to Stan's discovery requests (.9). Telephone conference with Todd regarding Wendy's accusations of murder coupled with Jamison's comments to determine whether Jamison's deposition should proceed or be included in separate lawsuit (.8). Update and revise document indexes (.5). Continue with review of request for production of documents and location of responsive documents (2.5). Conference with Kent Robison to review status (.5). Prepare and deliver documents/information for expert to to Federal Express (.8). Locate and prepare documents/information for Kent Robison (.3).	
1368.002	06/21/2018	19	A	9	110.00	4.60	506.00	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	06/21/2018	1	A	9	400.00	0.60	240.00 (50%) Receive and carefully reviewed Judge Hardy's decision on consumer fraud (.3). Work on initial draft of answer to Stan's petitions addressing with some degree of specificity each affirmative defense available (.9).	ARCH
1368.002	06/22/2018	19	A	9	110.00	2.80	308.00 Continue with review of all requests for production of documents and locate and list responsive documents/information (2.8).	ARCH
1368.002	06/25/2018	19	A	9	110.00	4.50	495.00 Conference with Kent Robison and Therese Shanks to review status and revise responses to requests for production of documents (.5). Continue with review of all requests for production of documents and locate and list responsive document/information (4.0).	ARCH
1368.002	06/25/2018	44	A	9	250.00	4.30	1,075.00 Review emails and update memo re who should respond to RFPs (0.2); begin draft responses to RFPs (4.1).	ARCH
1368.002	06/26/2018	1	A	9	400.00	0.55	220.00 (50%) Receive, review Stan Jaksick's response to Todd's third request for production of documents (.4). Start draft of letter to initiate the meet and confer obligations (.7).	ARCH
1368.002	06/26/2018	19	A	9	110.00	3.80	418.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Work on location and listing of responsive documents to requests for production (2.0). Review Wendy deposition transcripts (.5). Update document indexes (.5).	ARCH
1368.002	06/27/2018	44	A	9	250.00	0.90	225.00 Edit RFPs, and outline what client needs (0.75); call with counsel and obtain an extension to respond (0.15).	ARCH
1368.002	06/27/2018	1	A	9	400.00	1.20	480.00 Continue to work on objections and responses to Wendy's 1st, 2nd, 3rd, and 4th request for production of documents. Telephone conference with Todd regarding missing documents that are appropriate for disclosure.	ARCH
1368.002	06/27/2018	19	A	9	110.00	3.60	396.00 Conference with Kent Robison to review status (.3). Work on location and listing of responsive documents for request for production of documents (2.0). Attend status conference with Kent Robison and Therese Shanks (.5). Prepare and send documents/information to client (.3). Update indexes (.5).	ARCH
1368.002	06/28/2018	44	A	9	250.00	1.50	375.00 Meeting with clients re RFPs	ARCH
1368.002	06/28/2018	19	A	9	110.00	3.60	396.00 Work on location of and prepare of responsive documents for requests for production (1.0). Prepare for and attend conference with Therese Shanks and client to review all requests for production and responses (1.8). Telephone conference with expert J. Greene (.3). Review trust document disclosure (.5).	ARCH
1368.002	06/29/2018	1	A	9	400.00	2.30	920.00 (50%) Office conference with Todd Jaksick to prepare Todd for upcoming deposition (1.4). Dress rehearsal for mock examination of Todd under simulated deposition circumstances (1.9). Review exhibits with Todd that he is sure to be questioned about (1.3).	ARCH
1368.002	06/29/2018	19	A	9	110.00	3.60	396.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Review and print client emails and documents (.8). Review and organize new documents (.5). Work on new information for requests for production (.5). Meet with client and Therese Shanks (1.0).	ARCH
1368.002	06/30/2018	44	A	9	250.00	0.60	150.00 Review SDT (0.4); outline objections (0.2)	ARCH
1368.002	07/02/2018	44	A	9	250.00	0.70	175.00 Draft objections to SDT to (1) WSR (2) Incline TSS (3) Duck Lake (4) TBJ SC Trust and (5) Todd Family Trust	ARCH
1368.002	07/02/2018	19	A	9	110.00	3.40	374.00 Locate and prepare documents/information for Therese Shanks (.3). Work on requests for production responses (.8). Locate and prepare documents/information/exhibits for Kimmel deposition (1.5). Review and revise document indexes (.8).	ARCH
1368.002	07/03/2018	1	A	9	400.00	0.90	360.00 Continue review, outline, analysis, evaluation of Wendy deposition as it pertains to upcoming Kimmel deposition (.9).	ARCH
1368.002	07/03/2018	19	A	9	110.00	2.90	319.00 Telephone conference with Kent Robison to review assignment (.3). Work on location and preparation of documents/information/exhibits for Kimmel deposition (1.8). Update indexes (.8).	ARCH
1368.002	07/05/2018	1	A	9	400.00	1.90	760.00 Work on Todd's objections to subpoena duces tecum (1.9).	ARCH
1368.002	07/05/2018	19	A	9	110.00	3.80	418.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information/exhibits for Kimmel deposition (2.0). Assist with documents/information for objections to Subpoena (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	07/06/2018	1	A	9	400.00	5.60	2,240.00	ARCH
							Prepare exhibits for Kimmel deposition (.4). Pre-deposition conference with Don Lattin (.2). Review highlighted portions of Wendy's deposition taken by Don Lattin (.5). Took deposition of Mike Kimmel (3.6). Debrief Don Lattin and Mike Kimmel regarding potential motion to disqualify Stan based on his betrayal of duties to Trust (.4). Work on rearranging 30(b)(6) depositions given Stanley's position that they are to be scheduled for July 16th (.5).	
1368.002	07/06/2018	19	A	9	110.00	2.50	275.00	ARCH
							Conference with Kent Robison to review documents/information/exhibits for Kimmel deposition (1.5). Locate and prepare additional documents/information/exhibits (1.0).	
1368.002	07/09/2018	19	A	9	110.00	3.30	363.00	ARCH
							Review and update all document indexes (2.3). Print and review new documents/information from client (1.0).	
1368.002	07/10/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status (.2). Print, review and organize documents/information from client (1.3). Update deposition exhibit binders (.8). Work on responses to Wendy requests for production (.5).	
1368.002	07/11/2018	1	A	9	400.00	2.80	1,120.00	ARCH
							Telephone conference with Don Lattin regarding advisability of making offers of judgment and amounts thereof (.5). Continue discussions with Todd (T/C) concerning access to bank statements for Stanley Jaksick Family Trust of which Todd is co-trustee (1.0). Office conference with Todd to discuss status of document production, advisability of separate petition for damages against Stanley and conference with Pierre and 30(b)(6)/subpoena duces tecum productions (1.3).	
1368.002	07/11/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	07/11/2018	19	A	9	110.00	3.10	341.00	ARCH
							client meeting Continue with assembly and listing of documents for requests for production responses (1.5). Conference with Kent Robison to review status (.3). Print, review and organize documents/information from client (1.0). Locate, prepare and send documents/information to client (.3).	
1368.002	07/12/2018	19	A	9	110.00	3.30	363.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Update all requests for production with new documents and proposed changes (2.0). Print, review and organize documents from client (.8).	
1368.002	07/13/2018	19	A	9	110.00	3.70	407.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Work on documents/information/responses to requests for production of documents (1.8). Attend conference with Kent Robison and client (.8). Locate and prepare documents/information for Kent Robison (.8).	
1368.002	07/13/2018	1	A	9	400.00	1.70	680.00	ARCH
							(50%) Work with Todd on deposition preparation and did mock cross examination and rehearsal of examination concerning pertinent and relevant documents.	
1368.002	07/16/2018	19	A	9	110.00	4.50	495.00	ARCH
							Conference with Kent Robison to review status (.3). Work on preparing revised responses to requests for production with new documents (3.5). Conference with Therese Shanks to review status (.2). Work on final version (.5).	
1368.002	07/16/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Work on formulating objections to documents being requested by Stan's SDTs in preparation for scheduled met and confer with Adam. Telephone conference with Don Lattin regarding allocation of responsibility for responding to Stan's SDTs. Review and analyze Family Trust membership interest in Duck Lake and WSR (if any). Confirmation that Family Trust has no interest in WSR.	
1368.002	07/17/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.002	07/17/2018	19	A	9	110.00	2.60	286.00	ARCH
							Draft answer petition re Family Trust Conference with Kent Robison to review assignments (.5). Update document indexes with new documents (1.3). Review additional documents from client for possible disclosure (.8).	
1368.002	07/18/2018	23	A	9	325.00	1.15	373.75	ARCH
1368.002	07/18/2018	1	A	9	400.00	2.80	1,120.00	ARCH
							Deposition prep with Todd. Met with Todd Jaksick to review series of documents (both indemnification agreements, ACPA's, emails and texts) that will likely be topics at Todd's deposition. Deposition rehearsal with Frank Gilmore and Todd primarily concerning Incline TSS option and transfer of ownership from SSJ to Incline TSS.	
1368.002	07/18/2018	19	A	9	110.00	4.10	451.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5).	

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Client ID 1368.002 Jaksick/Todd								
1368.002	07/19/2018	19	A	9	110.00	4.10	451.00 Telephone conference with expert Green (.3). Work on next 16.1 supplement (1.0). Continue with index and organization of Wendy documents (12K pages) (2.0). Continue with review and revision of Wendy document indexes (12K pages) (2.5). Conference with Kent Robison to review assignments (.3). REview Kimmel deposition (.5). Work on next 16.1 supplement (.8).	ARCH
1368.002	07/20/2018	1	A	9	400.00	1.00	400.00 Telephone conference with Pierre Hascheff regarding deposition dates, discussions, background, and Todd's involvement in drafts and execution of indemnification agreements (.4). Work on scheduling Pierre's deposition (.3). Analyze and color coordinated maps for use as exhibit at hearing (.3).	ARCH
1368.002	07/20/2018	19	A	9	110.00	2.60	286.00 Continue with review and revision of all document indexes and creation/revision of chronological index (2.3). Conference with Kent Robison to review assignments (.3).	ARCH
1368.002	07/23/2018	19	A	9	110.00	3.10	341.00 Conference with Kent Robison to review status (.3). Continue with indexing of all documents produced (2.0). Locate, prepare and send documents/information to client (.3). Update deposition roster and binders (.5).	ARCH
1368.002	07/24/2018	1	A	9	400.00	0.70	280.00 Meet and confer with Don regarding objection to SDTs. Prepare for arguments on motion to compel.	ARCH
1368.002	07/24/2018	19	A	9	110.00	2.60	286.00 Locate, prepare and send documents/information to client (.3). Continue with review and revisions to all document indexes (2.0). Locate and prepare documents/information for Kent Robison (.3).	ARCH
1368.002	07/25/2018	44	A	9	250.00	0.40	100.00 meet and confer re subpoenas	ARCH
1368.002	07/26/2018	1	A	9	400.00	1.60	640.00 (50%) Participate in "Meet and Confer" with Adam (1.1). Work on Document Request Letter to Don (.4). Work on revisions to Answer to Stan's Petition (.8). Continued preparation for Stan's deposition (.9).	ARCH
1368.002	07/26/2018	19	A	9	110.00	2.30	253.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.8). WOrk on documents for next 16.1 supplemental disclosure (1.2).	ARCH
1368.002	07/27/2018	19	A	9	110.00	2.10	231.00 Telephone conference with Kent Robison to review assignments (.2). Review 30(b)(6) notices (.3). Locate, prepare and send documents/information for Kent Robison (.3). Continue with organization and indexing of all documents (.3).	ARCH
1368.002	07/30/2018	1	A	9	400.00	1.80	720.00 (50%) Work on document search for responses to Stan's SDTs. Telephone conference with Don Lattin regarding progress being made with Kevin Riley. Office conference with Todd to review documents necessary to respond to RSG, SDT. Review documents produced for Incline to determine whether documents are responsive. Work on preparation for deposition. Work on outline of topics to be covered on Stan's deposition. Office conference with Todd and Nik Palmer to review Nik Palmer's involvement with Sam, Wendy, Stan, and Todd and the various entities including Buckhorn, WSR, TSS, and Geyser.	ARCH
1368.002	07/30/2018	44	A	9	250.00	0.20	50.00 meeting with client and review letter from counsel	ARCH
1368.002	07/30/2018	19	A	9	110.00	3.30	363.00 Multiple conferences with Kent Robison to review status and assignments (.5). Prepare for and attend conference with Kent Robison and client (1.3). Locate and prepare documents/information for Kent Robison (.5). Begin assembly of Stan deposition exhibits (1.0).	ARCH
1368.002	07/31/2018	19	A	9	110.00	3.60	396.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information/exhibits for Stan deposition (3.3).	ARCH
1368.002	08/01/2018	1	A	9	400.00	1.20	480.00 Deposition notice. Work on responses to set and RFPs. Telephone conference with expert.	ARCH
1368.002	08/01/2018	19	A	9	110.00	1.80	198.00 Conference with Kent Robison to review status and assignments (.2). Locate and prepare documents/information/exhibits for Stan deposition (1.0). Contact expert Green and telephone conference (.3). Locate and prepare document/information for Kent Robison (.3).	ARCH
1368.002	08/02/2018	1	A	9	400.00	0.60	240.00 (50%) Telephone conference with Don Lattin regarding need for executed waiver waiving potential conflicts of interest between MCL and Todd. Telephone conference with Todd. Review document and finalize conflict waiver.	ARCH
1368.002	08/02/2018	19	A	9	110.00	2.80	308.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Stan deposition (1.5). Work on 16.1 document supplement (.3). Locate and prepare	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	08/03/2018	19	A	9	110.00	1.80	198.00	ARCH
							documents/information for Kent Robison (.3). Attend deposition preparation conference with Kent Robison and Todd Jaksick (.5).	
1368.002	08/06/2018	1	A	9	400.00	5.60	2,240.00	ARCH
							Telephone conference with Kent Robison to review assignment (.3). Locate, organize and prepare documents/information/exhibits for Stan deposition (1.5).	
1368.002	08/06/2018	19	A	9	110.00	5.30	583.00	ARCH
							Met with Todd and Don to review approach and plan for Stan's deposition (1.5). Took Stan's deposition regarding Wendy deal, pleading, indemnification, ACPAs on trust matters (4.1).	
1368.002	08/07/2018	1	A	9	400.00	4.10	1,640.00	ARCH
							Multiple conferences with Kent Robison (1.0). Attend conference with Kent Robison, client, Lattin (.5). Locate and prepare documents/information for Kent Robison (1.0). Locate and prepare additional documents/information/exhibits for Stan deposition (2.8).	
1368.002	08/07/2018	19	A	9	110.00	3.30	363.00	ARCH
							Pre deposition briefing with Don and Todd (1.2). Deposed Stan on trust issues relating to ACPAs, cattle, plane, tax etc (2.9).	
1368.002	08/08/2018	1	A	9	400.00	0.70	280.00	ARCH
							Review and print documents/information from client (.3). Conference with Kent Robison to review assignments (.5). Locate and prepare additional documents/information/exhibits for Stan deposition (2.0). Locate and prepare documents/information for Kent Robison. (.5).	
1368.002	08/08/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	08/08/2018	19	A	9	110.00	2.80	308.00	ARCH
							(50%) Work on offers of judgments. Research Rule 68 cases to see if one 68 Offer of Judgment, affects the other.	
1368.002	08/09/2018	44	A	9	250.00	3.75	937.50	ARCH
1368.002	08/09/2018	19	A	9	110.00	2.60	286.00	ARCH
							attend Stan deposition	
							Conference with Kent Robison to review assignments (.8). Locate and prepare documents/information for Kent Robison (1.0). Update deposition exhibit index and binders (.5). RReview and print documents/information from client (.5)	
1368.002	08/10/2018	44	A	9	250.00	2.25	562.50	ARCH
1368.002	08/10/2018	19	A	9	110.00	3.10	341.00	ARCH
							attend Wendy deposition	
							Work on revision of all documents produced indexes, chronological and bates stamp order (1.5). Locate and prepare documents/information for Therese Shanks (.5). Locate and prepare documents/information for clients (.3). Update deposition exhibit binders with new exhibits (.8).	
1368.002	08/13/2018	1	A	9	400.00	4.70	1,880.00	ARCH
							(50%) Met with Todd and Don to prepare for deposition by reviewing allegations in counter petitions (1.1). Attend and defend Todd at deposition taken by Adam (7.4). Lunch break conference with Todd and Mike to debrief (.9).	
1368.002	08/13/2018	19	A	9	110.00	3.20	352.00	ARCH
							Conference with Kent Robison to review status (.3). Prepare and deliver original deposition exhibits (.8). Locate and prepare documents/information for reporter (.3). Update/revise all document indexes (1.0). Review new documents form client (.8).	
1368.002	08/14/2018	1	A	9	400.00	5.65	2,260.00	ARCH
							(50%) Met with Todd and Don to review and debrief regarding Monday's deposition (1.3). Defend and attend Todd's deposition taken by Adam (6.9). Debrief with Todd and Don at tend of day (.9). Worked on motion to revoke Johnson's pro hac vice (2.2).	
1368.002	08/14/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.002	08/14/2018	19	A	9	110.00	3.40	374.00	ARCH
							research re grounds for pro hac vice admission revocation (1.5); outline motion (0.5)	
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Review and organize additional documents from client (.8). Work on deposition/witness files (1.8).	
1368.002	08/15/2018	1	A	9	400.00	3.90	1,560.00	ARCH
							(50%) Pre-deposition conference with Todd Jaksick to review nature and scope of Spencer's questions and to work on preparing Todd for further deposition examination (.9). Attend and defend Todd's deposition (6.1). Post deposition debriefing with Don, Todd, and Mike (.8).	
1368.002	08/15/2018	44	A	9	250.00	2.50	625.00	ARCH
							research re Rule 3.3 and 8.4 (0.5); draft facts and argument portion for motion re pro hac vice (1.5); edit (0.5)	
1368.002	08/15/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status (.3).	

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Client ID 1368.002 Jaksick/Todd								
1368.002	08/16/2018	1	A	9	400.00	3.85	1,540.00	ARCH
							Locate and prepare documents/information for Kent Robison (.5). Update deposition exhibit binders (.5). Work on witness files for upcoming depositions (1.5). (50%) Pre-deposition conference with Don and Todd (.7). Attend and defend Todd's deposition (5.1). Work on draft of motion to terminate deposition pursuant to NRCP 30(d); prepare Lattin declaration, Robison declaration, and Todd's declaration in support thereof (1.9)	
1368.002	08/16/2018	44	A	9	250.00	1.00	250.00	ARCH
							research re terminate deposition (0.5); draft motion and affidavit (0.5)	
1368.002	08/16/2018	19	A	9	110.00	3.40	374.00	ARCH
							Update deposition exhibit binders (.3). Attend conference with Kent Robison, Lattin, client (.8). Locate and prepare documents/information for Kent Robison (.8). Telephone conference with expert Green and send documents/information via Fed Ex (.5). Locate and prepare and send Stan transcripts to Dan (.5). Arrange for video duplication (.5).	
1368.002	08/17/2018	1	A	9	400.00	2.25	900.00	ARCH
							(50%) Work on and complete Rule 30(d) motion to terminate Todd's deposition (1.1). Work on motion to disqualify (1.6). Letter to client, MCL, and Kevin regarding production for 30(b)(6) (.7). Review, organize, and index Stan's deposition (1.1).	
1368.002	08/17/2018	44	A	9	250.00	2.50	625.00	ARCH
							Finish draft motion (1.5); incorporate KRR briefing into motion (0.5); edit (0.5)	
1368.002	08/17/2018	19	A	9	110.00	1.60	176.00	ARCH
							Conference with Kent Robison to review status (.3). Attend telephone conference with Kent Robison and Lattin (.5). Locate and prepare documents/information for Kent Robison (.8).	
1368.002	08/20/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Continue reading newly produced deposition transcripts of Wendy and Stan to find testimony impeaching sworn amended counter-petition to support motion to revoke pro hac vice admission.	
1368.002	08/20/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.8). Review Stan deposition (.5).	
1368.002	08/20/2018	19	A	9	110.00	3.10	341.00	ARCH
							Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Conference with Kent Robison to review status (.8). Prepare documents to be reviewed for production (.8).	
1368.002	08/23/2018	1	A	9	400.00	2.05	820.00	ARCH
							(50%) Continue review of notes and emails produced by Todd for our review (1.1). Office conference with Don Lattin, Todd Jaksick to review newly discovered documents including Sam's notes and new emails and to discuss status of motion to terminate deposition (1.6). Office conference with Todd and Stan to discuss and strategize responses to and compliance with NRCP 30(b)(6) deposition topics and subjects identified for Todd's Trusts and Companies (1.4).	
1368.002	08/23/2018	19	A	9	110.00	3.30	363.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Prepare for and attend conference with Kent Robison, Lattin, clients (1.5). Locate and prepare documents/information for Pierre (.5).	
1368.002	08/24/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Help Jim prepare chronology of events concerning Tahoe House binder for Pierre (.2). Assemble timeline and exhibits for Judge Hascheff's review in preparation for September 7th deposition (.2). Office conference with Pierre Hascheff and Don Lattin to review documents covered by Wendy's counsel at deposition and status of litigation with Judge Hascheff (2.0)	
1368.002	08/24/2018	19	A	9	110.00	3.25	357.50	ARCH
							Conference with Kent Robison to review status and assignments (.2). Locate and prepare documents/information for Kent Robison meeting with Hascheff (1.8). Work on next 16.1 document supplement (.5). Locate documents/information/exhibits for motion to disqualify (.3). Attend conference with Kent Robison and Lattin (.4).	
1368.002	08/27/2018	1	A	9	400.00	0.70	280.00	ARCH
							(50%) Telephone conference with Todd regarding meeting with Jim Corica and whether Corica's testimony will be helpful and whether deposition should be made given his age to preserve testimony (.6). Telephone conference with Don Lattin regarding position being taken by Wendy and Stan for dismissal of Michael Kimmel from lawsuits (.5). Confirmation to authorize electronic signature provided (.3).	
1368.002	08/27/2018	19	A	9	110.00	0.50	55.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent	

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Client ID 1368.002 Jaksick/Todd								
1368.002	08/28/2018	1	A	9	400.00	1.40	560.00	ARCH
							Robison (.3). Revised offers of judgment as instructed by client and obtain written authority to process and serve all offers of judgment (.5). Continue inserting defenses in Todd's proposed objection/answer to Stan's counter-petition in both cases (.4). Continue drafting objections and partial answers to interrogatories served by Wendy on Todd as an individual (.6). Continue working on responses and accumulating documents responsive to Jessica's contributions to answers to 30(b)(6) notices (.7). Office conference with Jessica to review issues and production mandates (.6).	
1368.002	08/28/2018	19	A	9	110.00	2.00	220.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison for deposition prep (.5). Work on 16.1 document supplement index (1.2).	
1368.002	08/29/2018	19	A	9	110.00	3.10	341.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Locate original deposition exhibit binders (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Work on 16.1 production (1.0).	
1368.002	08/30/2018	1	A	9	400.00	0.95	380.00	ARCH
							(50%) Evaluated Connot's push back letter and started draft of response (.7). Work on deposition schedule (.3). Start draft of reply to motion to terminate and opposition to motion for sanctions (.9).	
1368.002	08/30/2018	19	A	9	110.00	3.30	363.00	ARCH
							Telephone conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5).	
1368.002	08/31/2018	19	A	9	110.00	1.80	198.00	ARCH
							Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Update documents/exhibit/indexes (.3).	
1368.002	08/31/2018	44	A	9	250.00	2.00	500.00	ARCH
							Outline reply (0.5); research re termination of depositions (0.5); begin draft reply (1)	
1368.002	09/04/2018	19	A	9	110.00	4.30	473.00	ARCH
							Locate and prepare documents/information/exhibits for 30(b)(6) depositions (.8). Multiple conferences with Kent Robison to review status (1.0). Locate and prepare additional documents/information/exhibits for Kent Robison (1.0). Print and prepare documents/information from client (.5). Begin review of new Stan documents (5K pages) (1.0).	
1368.002	09/04/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/04/2018	1	A	9	400.00	3.40	1,360.00	ARCH
							continue draft reply (50%) Prepare for and took deposition of Stan Jaksick as 30(b)(6) witness for Toiyabe and 30(b)(6) witness for Jaksick Family LLC. Post deposition conferences with Adam and Don regarding more efficient way to obtain 30(b)(6) information through accountant. Email confirmation. Conference with Don and Adam regarding potential initiation of settlement discussions.	
1368.002	09/05/2018	19	A	9	110.00	2.00	220.00	ARCH
							Update all deposition exhibit binders (.5). Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Prepare documents for production (.5).	
1368.002	09/05/2018	44	A	9	250.00	0.70	175.00	ARCH
							emails re depositions (0.2); finish reply ISO mtn to terminate (0.5)	
1368.002	09/05/2018	1	A	9	400.00	1.20	480.00	ARCH
							(50%) Work on rescheduling 30(b)(6) depositions. Telephone conference with Don Lattin regarding availability of Kevin Riley to answer 30(b)(6) questions. Email traffic to Adam and Don regarding initiation of settlement negotiations. Receive Todd's outline and incorporate outline deal points into deposition questions for Pierre Haschef.	
1368.002	09/06/2018	19	A	9	110.00	2.50	275.00	ARCH
							Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0).	
1368.002	09/06/2018	44	A	9	250.00	2.00	500.00	ARCH
							Review depo transcripts re agitated or improper comments, length of breaks, etc. (0.5); outline opp to motion to compel (0.5); began draft opp (1)	
1368.002	09/06/2018	1	A	9	400.00	0.50	200.00	ARCH
							(50%) Work on objections to interrogatories served on Todd (.4). Telephone conference with Pierre Haschef's office regarding confirmation of deposition for 9/14/18 (.3). Process amended notice of deposition for Judge Haschef (.3).	
1368.002	09/06/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Request to help with response to 30(b)(6) notices on Todd. Email to Don to be directed and forwarded to Kevin, requesting documents for Todd	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	09/07/2018	19	A	9	110.00	1.50	165.00	ARCH
entities similar or identical to those produced by Stan for Stan entities. Commence review of Stan's deposition testimony regarding tracing of \$400,000 Bronco Billy proceeds and \$434,000 Bronco Billy proceeds to determine whether discouragement or reimbursement is appropriate.								
1368.002	09/07/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.002	09/10/2018	19	A	9	110.00	4.30	473.00	ARCH
Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0). Telephone conference with expert Green (.3). Finish draft opp (0.75); edit reply to match opp (0.75) Multiple conferences with Kent Robison to review status and deposition preparation (1.2). Attend conference with Kent Robison, client, Lattin (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.3). Print and process documents/information from client (.3). Locate and prepare documents/information for Kent Robison conference with Todd Alexander (1.0).								
1368.002	09/10/2018	1	A	9	400.00	4.00	1,600.00	ARCH
(50%) Office conference with Todd Jaksick to review pertinent documents and exhibits to be used for Pierre Haschef's deposition (3.2). Office conference with Todd Alexander, counsel for Pierre Haschef, to enlighten and educate Todd with respect to pleadings, allegations, accusations, and documents relevant to Pierre's involvement with Jaksick family and Todd (.8). Work on obtaining dates for mediation from Judge Gamble and Bob Eisenberg (.1)								
1368.002	09/11/2018	1	A	9	400.00	2.00	800.00	ARCH
(50%) Office conference with Todd Jaksick to review pertinent documents and exhibits to be used for Pierre Haschef's deposition (3.2). Office conference with Todd Alexander, counsel for Pierre Haschef, to enlighten and educate Todd with respect to pleadings, allegations, accusations, and documents relevant to Pierre's involvement with Jaksick family and Todd (.8).								
1368.002	09/12/2018	19	A	9	110.00	2.60	286.00	ARCH
Conference with Kent Robison to review status (.3). Update deposition exhibit binders (.3). Locate and prepare documents/information/exhibits for Pierre deposition (1.5). Locate and prepare documents/information for and attend telephone conference with Kent Robison and expert Green (.5).								
1368.002	09/13/2018	19	A	9	110.00	3.80	418.00	ARCH
Multiple conferences with Kent Robison to review assignments and prepare for upcoming depositions (1.5). Locate and prepare additional documents/information/exhibits for Pierre deposition (1.8). Locate documents/information for expert Green (.3). Locate, prepare and send documents/information to Todd Alexander (.3).								
1368.002	09/13/2018	1	A	9	400.00	1.10	440.00	ARCH
(50%) Prepare for meet and confer with Texas counsel regarding discovery issues, including request for production of documents, subpoena duces tecum, and Todd's deposition. Participate in meet and confer with counsel regarding discovery issues. Work on reply to motion to terminate and motion to challenge pro hac vice admission. Analyze water right deeds provided by Jessica.								
1368.002	09/14/2018	19	A	9	110.00	3.40	374.00	ARCH
Locate and prepare additional documents/information/exhibits for Pierre deposition (.8). Attend multiple conferences with Kent Robison, Lattin, client regarding deposition documents/information (1.5). Update deposition exhibit binders (.3). Review new documents from client (.8).								
1368.002	09/14/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/17/2018	19	A	9	110.00	2.30	253.00	ARCH
client meeting Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Update deposition roster and indexes (.5). Locate and prepare documents/information/exhibits for motion (.8).								
1368.002	09/17/2018	1	A	9	400.00	0.60	240.00	ARCH
(50%) Work on reviewing documents provided by Kevin Riley to Adam responsive to Todd's 30(b)(6) notice requests (.3). Email Don Lattin requesting Kevin provide same to Adam for 30(b)(6) noticed for Todd (.2). Work on stipulation to extend expert disclosures and discovery cutoff by and through court approved stipulation (.3). Work on demand for indemnification from Issue Trust and Family Trust for legal fees (.4).								
1368.002	09/18/2018	19	A	9	110.00	1.50	165.00	ARCH
Conference with Kent Robison to review status (.5). Update deposition exhibit and transcript binders (.5). Update Kent Robison working document binders (.5).								
1368.002	09/19/2018	19	A	9	110.00	0.50	55.00	ARCH
Conference with Kent Robison to review status (.2).								



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Client ID 1368.002 Jaksick/Todd								
1368.002	09/19/2018	44	A	9	250.00	1.80	450.00	ARCH
1368.002	09/19/2018	1	A	9	400.00	1.20	480.00	ARCH
1368.002	09/20/2018	19	A	9	110.00	1.70	187.00	ARCH
1368.002	09/20/2018	44	A	9	250.00	2.50	625.00	ARCH
1368.002	09/21/2018	1	A	9	400.00	1.15	460.00	ARCH
1368.002	09/21/2018	1	A	9	400.00	0.40	160.00	ARCH
1368.002	09/24/2018	19	A	9	110.00	2.30	253.00	ARCH
1368.002	09/24/2018	1	A	9	400.00	0.80	320.00	ARCH
1368.002	09/24/2018	1	A	9	400.00	2.00	800.00	ARCH
1368.002	09/25/2018	44	A	9	250.00	2.60	650.00	ARCH
1368.002	09/25/2018	19	A	9	110.00	2.30	253.00	ARCH
1368.002	09/26/2018	19	A	9	110.00	1.10	121.00	ARCH
1368.002	09/26/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/26/2018	1	A	9	400.00	0.90	360.00	ARCH
1368.002	09/27/2018	19	A	9	110.00	1.80	198.00	ARCH
1368.002	09/27/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/27/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/27/2018	1	A	9	400.00	0.60	240.00	ARCH
1368.002	09/28/2018	19	A	9	110.00	1.50	165.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	10/01/2018	1	A	9	400.00	0.60	240.00 (1.0). Update documents and deposition exhibit binders (.5). (50%) Revise objections to subpoena duces tecum (.3). Work on reviewing Judge Hascheff's deposition for testimony supporting Todd's interpretation of indemnification agreement (.2). Start draft of demand that Family Trust indemnify and/or pay Todd's legal fee and costs (.7).	ARCH
1368.002	10/01/2018	19	A	9	110.00	2.80	308.00 Conference with Kent Robison to review status and assignments (.5). Update deposition and document binders and indexes (.8). Locate and prepare documents/information for Kent Robison (.5). Continue with review and organize of potential trial exhibits (1.0).	ARCH
1368.002	10/01/2018	44	A	9	250.00	0.30	75.00 Finish draft Nano objections	ARCH
1368.002	10/02/2018	19	A	9	110.00	2.00	220.00 Conference with Kent Robison to review status (.5). Review Todd's corrections to all deposition transcripts (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.002	10/02/2018	44	A	9	250.00	1.00	250.00 Finish editing petition for reconveyance	ARCH
1368.002	10/02/2018	44	A	9	250.00	2.00	500.00 Research re diligence in conducting discovery for continuances (0.5); draft opposition to motion to continue trial (1.3); edit (0.2)	ARCH
1368.002	10/02/2018	1	A	9	400.00	0.60	240.00 (50%) Continue review with Todd and Jim of deposition testimony to prepare notice of corrections for all four versions (.8). Continue drafting demand for payment of fees by looking at all time charged and narratives reviewed (.4).	ARCH
1368.002	10/02/2018	1	A	9	400.00	0.50	200.00 (50%) Receive comments from Don Lattin regarding petition for reconveyance of funds diverted by Stanley of Bronco Billy's proceeds (.5). Inter-office conference with Therese to incorporate changes to reinstate 434 based upon Kevin Riley's expected testimony (.5).	ARCH
1368.002	10/03/2018	1	A	9	400.00	1.40	560.00 (50%) Continue to review and scrutiny of testimony from Pierre Hascheff concerning Sam Jaksick's intent that Todd be indemnified from Family Trust for attorney's fees and all claims against him (.8). Work on discovery issues being expressed by Todd Alexander, Mark Connot and Adam Hosmer-Henner concerning continue deposition for Judge Hascheff (.6). Work on more detailed responses and production of documents for subpoena duces tecum to Nanette and Jessica (.7). Work on including insertions concerning \$434,000 dollar misappropriation by Stan into Todd's petition for refund (.7).	ARCH
1368.002	10/03/2018	19	A	9	110.00	2.10	231.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft Notice of Corrections to depositions for Todd (1.0).	ARCH
1368.002	10/04/2018	1	A	9	400.00	0.80	320.00 Continue review and revisions of Todd's petition to have Bronco Billy's money returned to Family Trust.	ARCH
1368.002	10/04/2018	19	A	9	110.00	2.30	253.00 Conference with Kent Robison to review status (.5). Work on draft deposition corrections notices for Todd (1.0). Update document indexes (.5). Locate and send documents/information for client (.3).	ARCH
1368.002	10/05/2018	19	A	9	110.00	2.40	264.00 Conference with Kent Robison to review status (.3). Review and revise deposition notice corrections (.8). Update deposition roster and indexes (.3).	ARCH
1368.002	10/08/2018	19	A	9	110.00	0.80	88.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.002	10/08/2018	1	A	9	400.00	1.80	720.00 (50%) Office conference with Todd Jaksick and Don Lattin regarding discovery issues, expert designation, and request from Wendy's lawyers to continue dates and trial. Work on opposition to emergency motion to extend discovery. Continue to review with Todd regarding corrections to depositions and clarifications to non-sensical answers.	ARCH
1368.002	10/09/2018	1	A	9	400.00	1.85	740.00 (50%) Work on Supplemental Objections to Nanette & Jessica's SDTs (1.2). Work on Memo to Todd Alexander re: Pierre's continued deposition (1.1). Work with Todd to assemble Hascheff documents for inspection (.6). Communicate to counsel availability of Hascheff's documents available for inspection (.8).	ARCH
1368.002	10/10/2018	19	A	9	110.00	2.10	231.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Prepare additional information for Notice of Deposition Corrections (.3). Locate, prepare and send documents/information to Kent Robison (.5). Begin preparation for documents reviewed by Hosmer for production (1.0).	ARCH
1368.002	10/11/2018	19	A	9	110.00	1.80	198.00 Telephone conference with Kent Robison to reivew	ARCH

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	10/11/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	10/12/2018	1	A	21			0.00	ARCH
1368.002	10/12/2018	19	A	9	110.00	1.80	198.00	ARCH
							status (.3). Review Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	
							review motion to compel	
							Write off prior finance charges	
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on deposition notice corrections with Kent Robison (1.0).	
1368.002	10/12/2018	1	A	9	400.00	2.50	1,000.00	ARCH
							(50%) Office conference with Nanette to review notary book (.8). Made exhibits from pages of Nanette's notary book (.4). Confer with Todd regarding decisions to pay Ag Credit (.4). Telephone conference with Don and Todd and office conference regarding demand on Phil Kreitlin to authorize payment to Ag Credit and for Stan to produce accountings for sales of Montreaux lots in light of Family Trust interest in proceeds therefrom (.8). Prepare indemnification payment for fees demand letter by review of indemnification agreement provisions (.5). Stan's testimony (.4). Wendy's testimony regarding indemnification (.4). Draft Todd's declaration (.4). Review Hascheff testimony to include in demand (.5). Revise letter to MCL citing above as support for Trust and Issue Trust to pay legal fees charged to Todd by RSSB (.4).	
1368.002	10/15/2018	19	A	9	110.00	1.40	154.00	ARCH
							Work on documents/information to supplemental 16.1 disclosure (.3). Review and revise deposition corrections (.3). Revise document index detailed descriptions (.8).	
1368.002	10/16/2018	1	A	9	400.00	1.70	680.00	ARCH
							(50%) Office conference with Todd regarding sanction order, discuss all pending discovery issues, telephone conference with Don Lattin, review documents requested from Pierre's file.	
1368.002	10/16/2018	19	A	9	110.00	3.10	341.00	ARCH
							Conference with Kent Robison to review assignments (.3). Review/organize boxes of documents from client for upcoming inspection (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on detailed document indexes (1.0).	
1368.002	10/16/2018	44	A	9	250.00	1.00	250.00	ARCH
							Review order (0.2); research re potential reconsideration basis (0.2); begin outline to opposition to motion to compel (0.8)	
1368.002	10/17/2018	19	A	9	110.00	2.60	286.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Work on documents to be produced (organize and locate) (1.0). Continue with review and revision of detailed indexes (1.0). Locate, prepare and send documents/information to Kent Robison (.3).	
1368.002	10/18/2018	1	A	9	400.00	1.55	620.00	ARCH
							(50%) Office conference with Todd to review methods by which responses could be made to subpoena duces tecum. Review in detail subpoenas and topics with Todd. Continue review of the 526 RFPs to see if any manageable strategy or procedure could be implemented to draft a response. Review notary book and modify objection to subpoena duces tecum. Work on preparing Todd for additional topics that will be addressed and covered in continued deposition.	
1368.002	10/19/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Work on scheduling Pierre Hascheff's deposition. Participate with Don and Todd in preparing for pending discovery fight and upcoming meeting with Commissioner Ayres.	
1368.002	10/22/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Start draft of motion for protective order on all outstanding discovery issues. Research Rule 37 regarding burdens to obtain protective order. Start itemizing individual discovery requests made by Wendy's counsel. Continue to review methodology by which Jessica's emails could be identified and possibly produced.	
1368.002	10/22/2018	19	A	9	110.00	1.80	198.00	ARCH
							Review emails from Kent Robison regarding assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Begin review of Hascheff documents (6K pages) (.8). Continue with detailed descriptions in document indexes (.5).	
1368.002	10/23/2018	19	A	9	110.00	2.50	275.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information/exhibits for protective order (1.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	10/23/2018	44	A	9	250.00	3.00	750.00	ARCH
							draft opposition to motion to compel re claims on estate administration (1); draft opposition re mental capacity	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	10/23/2018	1	A	9	400.00	2.20	880.00	ARCH
							requests (1); begin draft opposition re financial requests (1) (50%) Work on opposition to motion to compel and cross-motion for protective order by analyzing the sheer number of requests made by Wendy in RFPs, SDTs, and similar requests of Nanette, Jessica, Pierre and Bob Legoy (1.4). Draft overview and prepare chart for inclusion, motion for protective order (.5). Review allegations and accusations in Wendy's amended counter-petition to compare with relevance of specified requests (.8). Work on determining how many emails are in Jessica's "system" that would have to be reviewed in order to be responsive to the subpoena duces tecum (1.7).	
1368.002	10/24/2018	19	A	9	110.00	1.90	209.00	ARCH
							Update deposition roster and indexes (.3). Continue with review of 6K pages of Hascheff documents (.8). Continue with revision of detailed document indexes (.8).	
1368.002	10/24/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.002	10/24/2018	1	A	9	400.00	1.70	680.00	ARCH
							finish draft opp re financial requests (50%) Telephone conference with Don Lattin (.3). Review disclosure forms produced by Don to allow Kevin Riley to testify concerning Duck Lake Flat, LLC, White Pine, LLC, Home Camp, LLC without tax returns (.3). Telephone conference with Todd regarding disclosure forms (.3). Office conference with Todd to review Duck Lake, LLC documents and financials included in 30(b)(6) production (.6). Work with Todd to prepare for second round of deposition with review of material recovered by Kevin Spencer and forecast of additional topics to be covered in next session (.8). Receive and review and discuss with client Judge Hardy's order addressing motion to extend discovery, expert deadlines, and trial (.3). Commence work on status conference statement for Todd regarding abuse of discovery tactics to be presented at November 16, 2018 hearing (.4). Work on and complete Todd's response to Wendy's fifth request for production of documents (.4).	
1368.002	10/25/2018	44	A	9	250.00	6.00	1,500.00	ARCH
							Draft opp re unrelated entities (2); draft opp re other unrelated requests (3); review 6, 7, and 8 document requests (1);	
1368.002	10/25/2018	19	A	9	110.00	4.00	440.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Prepare documents/information for Rile deposition (.5). RReview 4 days of Todd deposition testimony for information for Kent Robison (3.0).	
1368.002	10/25/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Continue draft of opposition to motion to compel and counter-motion for active order, including numerical analysis of 1,819 requests served on Todd and Todd Associates (Jessica, Bob Legoy, and PRN Kevin). Continue work on status conference statement to be submitted on behalf of Todd individually for both cases. Continue to review documents Kevin produced to Todd responsive to 30(b)(6) topics according to and formal agreement with Adam.	
1368.002	10/26/2018	44	A	9	250.00	1.25	312.50	ARCH
							Draft opp/motion re sanctions (0.5); edit opp/cntrmtn (0.75)	
1368.002	10/29/2018	1	A	9	400.00	5.10	2,040.00	ARCH
							(50%) Prepare for Kevin Riley deposition by review of accountings and documents provided from 30(b)(6) request (1.2). Office conference with Todd and Don to prepare for Kevin's testimony (1.6). Attend deposition of Kevin Riley (6.9). Post deposition debrief with client and Don regarding accounting issues raised by Adam in examination of Kevin Riley (.5).	
1368.002	10/29/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Locate and copy 30(b)(6) documents/usb for production to Adam (.5). Update document indexes (.5). Continue with review of Hascheff documents (.5).	
1368.002	10/30/2018	1	A	9	400.00	4.90	1,960.00	ARCH
							(50%) Prepare for and attend deposition of accountant Kevin Riley (4.2). Confer with client to prepare for client's deposition in light of Riley testimony (1.1). Attend and defend deposition of Todd Jaksick (3.7). Post deposition review of testimony and exhibits with Todd and debriefing after deposition testimony (.8).	
1368.002	10/30/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for depositions (Riley and Todd) (.8). Continue with review of Hascheff documents (1.0).	
1368.002	10/31/2018	1	A	9	400.00	4.10	1,640.00	ARCH
							(50%) Prepare Todd for further deposition testimony	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
							(.8). Attend and defend Todd's deposition taken by Kevin Spencer (6.3). Post deposition debrief with client (1.1).	
1368.002	10/31/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	10/31/2018	19	A	9	110.00	2.10	231.00	ARCH
							Incorporate client edits and final edits to opp mtn/countermtm	
1368.002	11/01/2018	1	A	9	400.00	0.80	320.00	ARCH
1368.002	11/01/2018	19	A	9	110.00		0.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for today's depositions (.8). Update exhibits on system (.5). Work on revisions to detailed document indexes (.5).	
1368.002	11/02/2018	19	A	9	110.00	1.80	198.00	ARCH
							(50%) Work on providing responses to Stan's request for admissions and responses to interrogatories (1.6) Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Review latest deposition exhibit, organize and index (1.0). Work on detailed document index (.8).	
1368.002	11/05/2018	1	A	9	400.00	0.70	280.00	ARCH
							Conference with Kent Robison to review status (.3). Organize and index deposition exhibits (original, working clean) (.8). Meet with court reporter regarding drop box for exhibits (.2). Continue with detailed document index (.5).	
1368.002	11/05/2018	19	A	9	110.00	2.10	231.00	ARCH
							(50%) Work on preparing answers/responses to Stanley's request for admissions (.3). Work on answers to interrogatories (.4). Submit both to Todd and Don for review (.1). Collaborate with Jim on responding to Stanley's two sets of request for production of documents (.8).	
1368.002	11/06/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.002	11/06/2018	19	A	9	110.00	3.40	374.00	ARCH
							Conference with Kent Robison to review status and assignment (.3). Assist with document information to respond to Stan's discovery requests (2.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for telephone conference with expert Green (.3).	
1368.002	11/06/2018	1	A	9	400.00	1.30	520.00	ARCH
							Draft responses to request for admissions for Family Trust with Todd (.7). Prepare memo for Todd explaining reasons for each denial and admission (.6).	
1368.002	11/07/2018	19	A	9	110.00	2.50	275.00	ARCH
							Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Review and respond to client emails (.3). Begin review of Todd deposition Vol. 5 (.8). Work on next 16.1 supplement (.8).	
1368.002	11/08/2018	19	A	9	110.00	2.40	264.00	ARCH
							Telephone conference with Kent Robison to review status and assignments (.3). Work on responses to Stan's requests for production of documents (1.8). Prepare and send documents/information to Kent Robison (.3).	
1368.002	11/09/2018	19	A	9	110.00	2.40	264.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft discovery responses (.8). Locate and prepare documents for Judge Hascheff (.3). Update document indexes (.5).	
1368.002	11/09/2018	1	A	9	400.00	1.05	420.00	ARCH
							(50%) Office conference at Don Lattin's to confer with Don and Todd regarding issues raised by Wendy's counsel, ongoing discovery, experts analysis, and strategies on how to apply for or get fees paid.	
1368.002	11/12/2018	1	A	9	400.00	0.75	300.00	ARCH
							(50%) Prepare declaration in support of Todd's demand for fees (.4). Work on first draft of Todd's status conference statement outlining for Court's consideration magnitude of discovery disputes and magnitude of discovery requests (1.1).	
1368.002	11/13/2018	19	A	9	110.00	3.40	374.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 production (.5). Prepare documents/information for Kent Robison (.5). Prepare for and attend conference with Kent Robison and client to work on discovery responses (1.8).	
1368.002	11/13/2018	1	A	9	400.00	0.70	280.00	ARCH
							Prepare and send documents/information to client (.3). Office conference with Todd to work on answers to interrogatories.	
1368.002	11/14/2018	19	A	9	110.00	4.00	440.00	ARCH
							Conference with Kent Robison to review draft discovery responses (1.0). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison and client to assist with documents/information for request for production	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	11/14/2018	1	A	9	400.00	1.70	680.00 responses (2.5). (50%) Work on supplement to opposition to motion to continue by including overview of discovery request showing chart of number of request for production, number of topics on subpoena duces tecum, number of interrogatories, request for admissions, compared to specific issues raised in counter-petitions (1.6). Review Todd's roles as Trustee of Issue, Trustee of Family, and as individual to restrict and limit issues pertaining to Todd as individual to finalize argument with curtailing discovery is better solution than continuing trial (1.8). (50%) Prepared for hearing reading briefs, etc. (1.2.) Motion to compel reviewed (.6). Prepare outline and index of discovery demands (.8). D. See emails and stuff to review for hearing (.2)	ARCH
1368.002	11/15/2018	1	A	9	400.00	1.40	560.00	ARCH
1368.002	11/15/2018	19	A	9	110.00	1.50	165.00	ARCH
1368.002	11/16/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.002	11/16/2018	19	A	9	110.00	1.80	198.00	ARCH
1368.002	11/16/2018	1	A	9	400.00	2.40	960.00	ARCH
1368.002	11/17/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	11/19/2018	19	A	9	110.00	1.70	187.00	ARCH
1368.002	11/20/2018	19	A	9	110.00	2.00	220.00	ARCH
1368.002	11/21/2018	19	A	9	110.00	2.60	286.00	ARCH
1368.002	11/27/2018	19	A	9	110.00	4.20	462.00	ARCH
1368.002	11/28/2018	19	A	9	110.00	2.30	253.00	ARCH
1368.002	11/29/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	11/29/2018	19	A	9	110.00	2.80	308.00	ARCH
1368.002	11/29/2018	1	A	9	400.00	2.40	960.00	ARCH
1368.002	11/30/2018	1	A	9	400.00	1.35	540.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
							propounded by Stan (.4). Revise and redraft responses to request for admissions (.3). Telephone conference with Don Lattin regarding sufficiency and adequacy of answers to RFA's and interrogatories (.4). Work on trial protocol statement (.3). Work on opposition to motion to compel regarding Jessica subpoena duces tecum (.6). Revise and draft introduction to motion to strike Wendy's petition (.4). Work on changes to opposition to motion to join indispensable party and finalize (.3).	
1368.002	11/30/2018	19	A	9	110.00	1.30	143.00	ARCH
1368.002	12/03/2018	44	A	9	250.00	1.40	350.00	ARCH
1368.002	12/03/2018	19	A	9	110.00	1.00	110.00	ARCH
1368.002	12/03/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							(50%) Office conference with Todd and Jessica to have them assist in Todd's opposition to Wendy's motion to compel production (1.8). Work with Deb Harris on formulating methodology to ascertain number of emails in Jessica's system for AOL and Gmail concerning specified topics (1.1). Work with Deb on declaration to show Commissioner and Judge the fact that Jessica needs to review and possibly produce 46,000 emails (.6). Telephone conference with Jim Green regarding issues raised in handwriting samples (.7). Complete Todd's answers to 1st Set of Interrogatories regarding Family Trust (.6). Met and confer with Todd to finish Todd's answers to 1st Set of Interrogatories regarding Issue Trust (1.2)	
1368.002	12/04/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.002	12/04/2018	1	A	9	400.00	2.10	840.00	ARCH
							(50%) Continue draft of motion for summary judgment against Stanley (1.2). Assemble accumulated exhibits and testimony for draft of MSJ against Stan (1.4). Work on finalizing motion for summary judgment on Wendy's claims (.8). Work on assembling exhibits to motion from deposition exhibits and deposition testimony (.8).	
1368.002	12/05/2018	19	A	9	110.00	2.40	264.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend telephone conference with Kent Robison and expert Green (1.0). Locate and prepare documents/information for Green (.3). Attend conference with Kent Robison and client (.3).	
1368.002	12/05/2018	1	A	9	400.00	3.55	1,420.00	ARCH
							(50%) Complete final draft with attached exhibits of MSJ against Wendy (1.9). Finish final draft together with final review of exhibits and testimony of Todd's MSJ motion against Stan (2.2). Telephone conference with Jim Green; review each and every known to give Jim basis for reasons why known are in fact known signatures of Sam and/or Wendy; discuss matters to be included in Jim's expert witness report (2.1). Telephone conference with Mike Ivey regarding IT services for trial (.5). Review, finalize, proof read and change minor portions of Todd's opposition to Wendy's motion to join indispensable parties (.4).	
1368.002	12/06/2018	1	A	9	400.00	2.75	1,100.00	ARCH
							(50%) Continue development of trial protocol (.4). Work on 1st draft of discovery conference statement (.8). Work on and complete opposition to 40 party joinder motion (.6). Office conference with Todd regarding declarations for opposition (.5). Work on Jury Instructions (.9). Letters to expert regarding refinement of assignment (.8). Letter to MCL regarding fees (.5). Office conference with Jessica regarding deposition notice and details regarding Todd's involvement in various companies (.6). Motion in limine list prepared (.4).	
1368.002	12/06/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for motion (.4). Locate and prepare documents/information/exhibits for discovery status report (1.2). Attend telephone conference with Kent Robison, Lattin and client (.3). Prepare documents/information for Kent Robison conference with client (.5).	
1368.002	12/07/2018	44	A	9	250.00	0.50	125.00	ARCH
							review new motions	

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1368.002	Jaksick/Todd	12/07/2018	19	A	9	110.00	1.30	143.00	Conference with Kent Robison to review status (.3). Deliver courtesy copies of report to court (.5). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.002		12/07/2018	1	A	9	400.00	0.95	380.00	(50%) Review status of various discovery issues (.8). Draft Todd's (Trustee and Individually) discovery status report, revised, finalized and filed (1.1).	ARCH
1368.002		12/10/2018	19	A	9	110.00	3.10	341.00	Telephone conference with Kent Robison to review status and assignments (.3). Work on 16.1 supplement (1.0). Locate, prepare and send documents/information to Kent Robison (.3). Locate and print Secretary of State information on all entities identified in our motion (1.5).	ARCH
1368.002		12/11/2018	1	A	9	400.00	3.00	1,200.00	(50%) Office conference with Don and Todd to review pending motions and discovery including motion to compel regarding Jessica Clayton, Wendy's motion for leave to join indispensable parties, motion to strike Wendy's petition to redress Todd's MSJ against Wendy and Stan, Wendy's motion to compel regarding Childers and Legoy (.9). Review trial protocol statement with Todd (.3). Work on confirming settlement conference with Bob Enzenberger and reserving Sunshine Litigation offices (.3). Participate in discovery dispute conference with Commissioner Ayres (1.1). Debrief with Don and Todd (.2). Work on Jackrabbit Capital call (.2).	ARCH
1368.002		12/11/2018	19	A	9	110.00	1.90	209.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	ARCH
1368.002		12/11/2018	19	A	9	110.00	1.90	209.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	ARCH
1368.002		12/12/2018	19	A	9	110.00	2.00	220.00	Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplemental document production (1.0).	ARCH
1368.002		12/12/2018	1	A	9	400.00	1.10	440.00	(50%) Draft Todd's second discovery dispute report based on participation in December 11th discovery dispute conference with Discovery Commissioner (1.2). Review law on out of state subpoena duces tecum and analyze Wendy's records subpoenas for Good Samaritan, Los Angeles Cardiologist and Dr. Cannom (1.0).	ARCH
1368.002		12/13/2018	44	A	9	250.00	0.50	125.00	Meeting with clients (1); research re time for final action order (1); edit memo to client (1)	ARCH
1368.002		12/13/2018	19	A	9	110.00	2.90	319.00	Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Locate original deposition exhibits (.3). Work on next 16.1 disclosure (.8). Begin review of 300 pages of Sam's medical records (1.0).	ARCH
1368.002		12/13/2018	1	A	9	400.00	2.50	1,000.00	(50%) Work on reply to Wendy's opposition to motion to compel production regarding Jessica Clayton (2.1). Receive and review records of Dr. Ronald Smith for any evidence of mental incapacity (.8). Review filings by counsel for Wendy (.3). Receive and thoroughly review with comments asserted therein James Green's expert witness report (1.8).	ARCH
1368.002		12/14/2018	19	A	9	110.00	3.10	341.00	Multiple telephone conferences with Kent Robison regarding status and assignments (.3). Continue with review of medical records from Dr. Smith (1.8). Research drug side effects (1.0).	ARCH
1368.002		12/14/2018	1	A	9	400.00	1.10	440.00	(50%) Receive and review Wendy's 9th Request for Production of Documents regarding documents on which Todd signed Sam's name (.3). Draft responses to 9th Request for Production of Documents (.4). Review Wendy's second set of interrogatories to Todd and prepare answers (.3). Review Wendy's RFPs to Stan and confer with Todd regarding these discovery requests (.3). Receive and review Jim Green's draft of expert report and provide answers to questions asked (.9).	ARCH
1368.002		12/17/2018	19	A	9	110.00	3.40	374.00	Conference with Kent Robison to review assignments (.3). Assist with documents/information/exhibits for expert disclosure (2.0). Review new documents from Trust (.3). Work on 16.1 supplement (.3). Review Pierre	ARCH



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Client ID 1368.002 Jaksick/Todd								
1368.002	12/17/2018	1	A	9	400.00	3.20	1,280.00	ARCH
							deposition Vol. II (.5). (50%) Work on preparing expert disclosures concerning James Green and in collaboration with Don concerning recipient experts (1.2). Telephone conference collaboration with Don Lattin (1.1). Receive, review Wendy's replies to our opposition to her motion to join additional parties (.8). Receive, review Wendy's reply to Don Lattin's opposition to Wendy's petition "to redress" (.9). Telephone conference with Nik Palmer regarding subpoena duces tecum and responses available under Rule 45 (.2). Receive and review Wendy's initial expert disclosures; read carefully report of Campagna, Stolbach and Wallace (2.2).	
1368.002	12/18/2018	19	A	9	110.00	4.00	440.00	ARCH
							Review Wendy's expert disclosures (.3). Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Review new documents from client (.8). Locate and prepare documents/information for discovery hearing (.8). Attend pre-hearing conference with Kent Robison and client (1.0).	
1368.002	12/18/2018	1	A	9	400.00	2.20	880.00	ARCH
							(50%) Office conference with Don Lattin and Todd Jaksick to prepare for discovery dispute conference (1.4). Participation in telephone discovery dispute conference with Commissioner Ayres (1.6). Prepare, file, and serve 30(b)(6) notices (1.4).	
1368.002	12/19/2018	44	A	9	250.00	3.00	750.00	ARCH
							Draft objection to request for submission (0.5); review reply in support of emergency motion to remove Todd (0.5); review opposition to MOTION FOR SUMMARY JUDGMENT re Stan (0.5); begin draft reply (1.5)	
1368.002	12/19/2018	19	A	9	110.00	3.60	396.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft trial exhibit index (.5). Attend telephone conference with Kent Robison and client (.5). Prepare second amended indemnity time line documents (1.0). Work on 16.1 disclosures (.5).	
1368.002	12/19/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Done notices of deposition preparation. Continue to review outline and summarize depositions of Stanley Jaksick and Pierre Hascheff.	
1368.002	12/20/2018	44	A	9	250.00	2.50	625.00	ARCH
							Review motion to strike (0.5); continue draft reply ISO MOTION FOR SUMMARY JUDGMENT re Stan (1.5); review SDT to Tigor Title and outline objections (0.5)	
1368.002	12/20/2018	19	A	9	110.00	3.60	396.00	ARCH
							Multiple telephone conferences/emails with Kent Robison to review assignments (.3). Review, print and organize new photographs from client (.5). Work on 16.1 disclosures (1.0). Prepare and send documents/information to Alexander (.3). Contact and email documents/information to Green (.5). Review and prepare Chrisman documents (1.0).	
1368.002	12/21/2018	44	A	9	250.00	1.00	250.00	ARCH
							research re motion to strike for untimeliness (0.5); outline opposition (0.5)	
1368.002	12/21/2018	19	A	9	110.00	2.70	297.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Work on 16.1 supplement (1.0). Update deposition/trial exhibit indexes (.8). Review and print documents/information from client (.3).	
1368.002	12/24/2018	19	A	9	110.00	2.20	242.00	ARCH
							Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison, Therese Shanks and client (1.5).	
1368.002	12/24/2018	1	A	9	400.00	2.70	1,080.00	ARCH
							(50%) Finalize, review by proof read and changes Todd's opposition to Wendy's motion to compel production from Nanette Childers (1.4). Receive and review Wendy's opposition to Todd's motion to dismiss petition for redress (.8). Receive, review Stan's opposition to Todd's motion for summary judgment (.9). Start outline and draft of reply to Stan's opposition (.6). Meeting with Therese to review and correct Todd Jaksick's reply to Wendy's opposition to our motion to strike petition for redress (.5). Complete all portions of finalized trial protocol statement (.9). Discuss proposed trial protocol statement with Don and agreed to file on December 26th (.3).	
1368.002	12/26/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 disclosures (.8). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0).	
1368.002	12/26/2018	1	A	9	400.00	1.35	540.00	ARCH
							(50%) Receive, review Wendy's opposition (50 pages)	

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Client ID 1368.002 Jaksick/Todd								
1368.002	12/26/2018	1	A	9	400.00	2.60	1,040.00	ARCH
							to Todd's motion regarding Issue Trust (2.1). Commence outline preparation for reply (.6). (50%) Telephone conference with Don and Jessica regarding pending deposition and status of procedure regarding objection to Rule 45 subpoena served on Jessica (.5). Receive Zack's December 26, 2018 letter outlining the number of requests for production that should be responded to first for mediation purposes, regarding "mission critical requests" (2.3). Conference with Todd and Don regarding same (1.2). Continue to review initial 4 sets of requests to determine if response to these 88 are feasible (.9). Prepare demand on Family Trust to cover Jack Rabbit capitol call (.3).	
1368.002	12/27/2018	19	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review assignments (.5). Assist with documents/information/exhibits for settlement conference statement (2.5).	
1368.002	12/28/2018	19	A	9	110.00	2.00	220.00	ARCH
							Work on next 16.1 document disclosure (.5). Conference with Kent Robison (.5). Locate and prepare documents/information for Kent Robison (1.0).	
1368.002	12/28/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Work on designation of rebuttal experts (.7). Receive, review Kevin Riley's second supplement to designation of expert witnesses (.8). Receive, review supplemental expert witness designations from Wendy concerning notices of deposition for Palmer, Childers, and McQuaid (.3). Receive and review Commissioner's recommendations for Jessica to provide certain emails and documents from server (.4).	
1368.002	12/31/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0).	
1368.002	12/31/2018	1	A	9	400.00	2.10	840.00	ARCH
							(50%) Complete rebuttal expert witness disclosure and filed same (.6). Review Therese's version and draft of Todd's reply to Stan's opposition to motion for summary judgment; made corrections and redraft introduction (.3). Telephone conference with Nik Palmer regarding objection to subpoena duces tecum served on Nik December 17, 2018 (.5). Prepare and made revisions to first draft of Jessica's objection to second subpoena duces tecum (.5). Work on draft of Todd's reply to Wendy's opposition to Todd's motion for summary judgment (.4). Draft Todd's discovery status report to Judge Hardy due January 4th (.7). Telephone conference with Don regarding Kevin Riley's deposition and whether to object or postpone (.3). Start draft of Todd's pretrial disclosures due to be filed January 4, 2019 (.6). Start motion for protective order concerning Jessica being deposed for more than 1 day (.3).	
1368.002	01/02/2019	1	A	9	400.00	4.20	1,680.00	ARCH
							(50%) Prepare for settlement conference (.6). Attendance at settlement conference (3.6).	
1368.002	01/02/2019	44	A	9	250.00	5.25	1,312.50	ARCH
							Research re statute of limitations (0.5); outline reply iso MOTION FOR SUMMARY JUDGMENT re Wendy (0.5); draft reply (1.25); edit (0.25); finish outline to opp to Stan Mtn Strike (0.5); draft opp (1.5); edit (0.5); review mtn to exclude by Trustees (0.25)	
1368.002	01/02/2019	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information/exhibits for upcoming depositions (1.0). Work on trial exhibit index (.8).	
1368.002	01/03/2019	1	A	9	400.00	4.80	1,920.00	ARCH
							(50%) Pre-conference meeting with clients and counsel (1.4). Settlement conference (8.2).	
1368.002	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review status (.2). Work on trial document index (.8). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information/exhibits for Riley deposition (.5). Locate and pickup original deposition exhibits (.5). Print documents/information for Kent Robison (.5).	
1368.002	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.5). Deliver original deposition exhibit binders (.5). Assist with documents/information for pre-trial disclosures (1.8).	
1368.002	01/04/2019	44	A	9	250.00	1.50	375.00	ARCH
							Outline reply to motion to strike (0.5); draft reply (0.75); edit (0.25)	
1368.002	01/04/2019	1	A	9	400.00	4.10	1,640.00	ARCH
							(50%) Kevin Riley deposition.	
1368.002	01/05/2019	1	A	9	400.00	2.90	1,160.00	ARCH
							(50%) Kevin Riley deposition.	
1368.002	01/07/2019	44	A	9	250.00	3.50	875.00	ARCH
							Research re UTA, Restatement and Nevada law on duty to report (2); begin compiling comparative memo for trial re same (1.5)	
1368.002	01/07/2019	19	A	9	110.00	4.40	484.00	ARCH
							Multiple conferences with Kent Robison to review	

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Client ID 1368.002 Jaksick/Todd								
1368.002	01/07/2019	1	A	9	400.00	2.70	1,080.00	ARCH
							status and assignments (.8). Locate and prepare documents/information for Kent Robison (1.3). Work on trial exhibit index (.5). Assemble and prepare first set of exhibits for duplication (1.0). Locate and prepare documents/information/exhibits for motions (.8). (50%) Motion to strike Wendy's petition; work on reply; redraft introduction; incorporate provisions from restatement of trusts (.6). Work on our response to Stan's motion to strike (1.4). Work with Jim and Debra on organizing trial exhibits and conforming deposition index to Court Clerk's requirements (2.2). Work on deposition scheduling with letter to all counsel (1.2).	
1368.002	01/08/2019	44	A	9	250.00	5.25	1,312.50	ARCH
							Finish researching and drafting memo re trustee duties under NV law, UTA and Restatement (3.5); edit (1); attend discovery hearing (0.75)	
1368.002	01/08/2019	19	A	9	110.00	4.10	451.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison and Mark Juey (Trial Techo) (.5). Begin preparation of information for mark Juey (.5). Review Wendy's new disclosures (.3). Work on assembly of trial exhibits (1.8).	
1368.002	01/08/2019	1	A	9	400.00	1.45	580.00	ARCH
							(50%) Office conference with Mark Ivey to set up IT for display of exhibits and deposition testimony to court and jury (1.4). Prepare for discovery conference with Commissioner Ayres (.3). Participate in discovery conference with Commissioner Ayres (1.2).	
1368.002	01/09/2019	44	A	9	250.00	5.50	1,375.00	ARCH
							Call with client and co-counsel (0.25); research re trusts being deposed (0.5); outline motion (0.5); pull deposition excerpts (0.5); draft motion (3); edit (0.5); draft affidavits (0.25)	
1368.002	01/09/2019	19	A	9	110.00	3.80	418.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Attend status telephone conference with Kent Robison, Therese Shanks, Lattin (.8). Locate and prepare documents/information/exhibits for Therese Shanks (1.0). Work on trial exhibits and binders (1.0).	
1368.002	01/09/2019	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Conference with Don Lattin, Todd Jaksick regarding allocation and division of assignments for upcoming deposition and discovery issues. Letters to counsel regarding upcoming deposition of experts. Work with Mark Connot to move deposition dates for various experts pursuant to stipulation. Work on jury instructions with Claudia.	
1368.002	01/10/2019	19	A	9	110.00	3.80	418.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Attend deposition prep conference with Kent Robison and Childers and Clayton (1.0). Work on next 16.1 disclosure (1.0). Work on trial exhibits (1.0).	
1368.002	01/10/2019	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Deposition preparation with Nanette Childers (.5). Work with Jessica on obtaining additional documents concerning exchange between Sam's office and Pierre's office in December 2012 (.4). Research notary laws regarding Nanette's notarization (.3). Work on discovery status report for Judge Hardy and complete same (1.0).	
1368.002	01/11/2019	1	A	9	400.00	3.30	1,320.00	ARCH
							(50%) Continue to draft jury instructions (.2). Research implications of whether restatement third applies to jury instructions (.2). Research specific provisions of restatement cited by Wallace and in Wendy's petition (.4). Work on drafting motion in limine regarding Wendy's experts (1.2). Continue to work on deposition summary of Wendy (3.1). Outline for trial statement (1.5).	
1368.002	01/11/2019	44	A	9	250.00	4.00	1,000.00	ARCH
							Jury instructions (3); review potential motions in limine and bases for trial statement (1)	
1368.002	01/11/2019	19	A	9	110.00	3.90	429.00	ARCH
							Conference with Kent Robison to review assignments (.3). Work on trial exhibit binders (1.3). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplement (.5). Reivew/prepare Jessica documents (700 pages) (1.0).	
1368.002	01/14/2019	44	A	9	250.00	4.00	1,000.00	ARCH
							Review Wendy Opp (0.5); research re Wendy authority (0.5); draft reply (2); begin draft MIL (1)	
1368.002	01/14/2019	19	A	9	110.00	5.10	561.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information/exhibits for upcoming expert depositions (2.5). Download documents/information for Mark Juey (.5). Review new documents from Wendy	

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Client ID 1368.002 Jaksick/Todd								
1368.002	01/14/2019	1	A	9	400.00	2.00	800.00 (.8). Deliver and pickup deposition exhibit binders (.5). (50%) Office conference with Nanette Childers to prepare for deposition (.8). Appearance at and defend Nanette's deposition (3.2).	ARCH
1368.002	01/15/2019	1	A	9	400.00	3.70	1,480.00 (50%) Deposition preparation for Campagna. Deposition of expert Campagna. Conference with Don and Todd. Interrogatories. Telephone conference with Jess. Motions in limine.	ARCH
1368.002	01/15/2019	44	A	9	250.00	3.50	875.00 Research re expert testimony on intent, credibility and contract interpretation (0.5); research re exclusion of evidence re discovery disputes (0.5); draft MIL re exclude Stolbach, discovery dispute, pejorative terms, begin re Campagna, Wallace (2.5)	ARCH
1368.002	01/15/2019	19	A	9	110.00	5.40	594.00 Multiple conferences with Kent Robison for deposition prep and status update (.5). Locate and prepare documents/information/exhibits for expert deposition (2.5). Work on trial exhibits (.3). Locate and prepare documents/information for Kent Robison (.8). Work on JC 16.1 supplement (.3). Locate, prepare documents and attend discovery hearing (1.0).	ARCH
1368.002	01/16/2019	19	A	9	110.00	3.70	407.00 Conference with Kent Robison to review status (.2). Update deposition exhibit binders (.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Review latest Wendy disclosure (.5). Locate and prepare documents/information for Kent Robison (1.0).	ARCH
1368.002	01/17/2019	19	A	9	110.00	4.80	528.00 Conference with Kent Robison to review status and deposition exhibits (.5). Locate and prepare additional documents/information/exhibits for deposition (1.0). Update deposition exhibit binders (.3). Attend conference with Kent Robison, Lattin and client (1.0). Work on trial exhibit (1.0). Review Ticor and Bank of America documents (1.0).	ARCH
1368.002	01/17/2019	1	A	9	400.00	2.80	1,120.00 (50%) Prepare for Stolbach deposition by reviewing all aspects of expert witness report (.4). Review via statutes regarding Todd's duty and obligation to follow testators "intent" (.3). Took deposition of Gary Stolbach (4.9).	ARCH
1368.002	01/17/2019	1	A	9	400.00	0.90	360.00 (50%) Office conference with Jessica Clayton to review all documents that she notarized in preparation for her deposition (1.4). Receive, review Stan's reply to Todd's opposition to motion to strike (.4).	ARCH
1368.002	01/18/2019	19	A	9	110.00	3.40	374.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on preparation of trial exhibit binders (1.8). Work on final 16.1 supplement (.3). Update deposition exhibit binders (.5).	ARCH
1368.002	01/18/2019	1	A	9	400.00	1.10	440.00 (50%) Deposition preparation session with Jessica Clayton. Prepare discovery status report for Judge Hardy.	ARCH
1368.002	01/21/2019	1	A	9	400.00	1.10	440.00 (50%) Worked with Jessica to prepare for deposition.	ARCH
1368.002	01/21/2019	44	A	9	250.00	2.25	562.50 attend deposition of Bob LeGoy	ARCH
1368.002	01/21/2019	19	A	9	110.00	1.00	110.00 Work on trial exhibits (1.0).	ARCH
1368.002	01/22/2019	1	A	9	400.00	5.60	2,240.00 (50%) Met with Jessica Clayton and review documents signed by Sam that she notarized (1.5). Appear at and defend Jessica's deposition (6.5). Prepare for discovery dispute conference with Wesley Ayres (.2). Participate in discovery dispute conference with Commissioner Ayres (.9). Prepare to take deposition of Wendy's expert Wallace (2.1).	ARCH
1368.002	01/22/2019	19	A	9	110.00	5.60	616.00 Multiple conferences with Kent Robison to review status and assignments (.8). Attend deposition preparation conference with Kent Robison and Jess (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on documents for Audio/Tech person (.5). Work on trial exhibits and exhibit index (2.5).	ARCH
1368.002	01/23/2019	1	A	9	400.00	4.80	1,920.00 (50%) Prepare for deposition of Bruce Wallace by reviewing report references and favorable testimony of Pierre Hascheff and Bob Legoy (2.2). Took deposition of Bruce Wallace (3.8). Participate in deposition of Bruce Wallace taken by Don Lattin (2.1). Work on motion in limine regarding Wallace testimony (.5). Continue work on jury instructions (.6). Start drafts of demonstrative evidence (.4).	ARCH
1368.002	01/23/2019	19	A	9	110.00	6.00	660.00 Multiple conferences with Kent Robison to review assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information/exhibits for Kent	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	01/24/2019	19	A	9	110.00	5.30	583.00 Robison (1.0). Work on trial exhibits and exhibit index (3.5). Multiple conferences with Kent Robison to review status and assignments (1.0). Work on trial exhibits and exhibit index (3.5). Organize and prepare depositions for trial (.5). Prepare and send documents/information to client (.3).	ARCH
1368.002	01/24/2019	1	A	9	400.00	0.85	340.00 (50%) Office conference with Todd Jaksick regarding pending issues for settlement discussions (.3). Confer and discuss regarding need to respond to Wendy's RFPs as recommended by Commissioner Ayres (1.4).	ARCH
1368.002	01/25/2019	19	A	9	110.00	5.00	550.00 Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Work on trial exhibit binders and index (3.2). Locate, prepare and send documents/information to expert Green (.5).	ARCH
1368.002	01/25/2019	1	A	9	400.00	2.30	920.00 (50%) Pre-deposition conference with James Green to go over documents and matters on which James would be deposed on Monday (1.6). Prepare and file discovery status report for Judge Hardy (.5). Work on objections to recommendations made by Wesley Ayres concerning production of financial statements (.3). Work on and finalize objection to subpoena duces tecum sent to me, but not served on James Green (.8). Telephone conference with Judge Hardy as relating to marking of exhibits and pre-trial status of all pending matters (1.4).	ARCH
1368.002	01/26/2019	1	A	9	400.00	2.00	800.00 (40%) Trial preparation - deposition summary Wendy.	ARCH
1368.002	01/27/2019	1	A	9	400.00	2.00	800.00 (40%) Trial preparation - deposition summary Stan.	ARCH
1368.002	01/28/2019	19	A	9	110.00	5.60	616.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate, organize and prepare trial exhibits (2.3). Index trial exhibits (1.5). Locate and prepare transcript for trial (.8).	ARCH
1368.002	01/28/2019	44	A	9	250.00	1.00	250.00 Edit MIL	ARCH
1368.002	01/28/2019	1	A	9	400.00	4.30	1,720.00 (50%) Review exhibits submitted to James Green to confer and prepare for Green's deposition (.8). Telephone conference with Todd regarding stamp, certificate of trust, and cutting and pasting Jarad (.7). Participate in deposition of James Green (5.9). Conference with Don and Todd regarding parameters and details of settlement discussions between Todd and Stan (.9). Work on motion in limine regarding authentication of documents and ability of documents not going to jury (.3)	ARCH
1368.002	01/29/2019	19	A	9	110.00	5.50	605.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit binders (4.0).	ARCH
1368.002	01/29/2019	44	A	9	250.00	1.50	375.00 Review re trial MIL, statement, objections, etc. (0.25); draft additional MIL (0.5); draft objection to subpoena (0.5); draft supplement to discovery dispute report (0.25)	ARCH
1368.002	01/29/2019	1	A	9	400.00	4.70	1,880.00 (50%) Work on responding with documents responsive to Commissioner's recommendation with meeting with Todd and Jessica (3.2). Complete motions in limine by including references to testimony of Stolbach Wallace and Campagna (2.2). Prepare for discovery conference with Commissioner Ayres (.8). Participate in discovery dispute conference with Commissioner Ayres (1.5). Email Green regarding originals (.2). Continue work on jury instructions from statutes and pattern regarding evidentiary issues (.6). Telephone conferences with Todd, Don, and Bob Enzenberger regarding settlement issues and points to be raised to find money for settlement (.9).	ARCH
1368.002	01/30/2019	19	A	9	110.00	5.30	583.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on/assist with responses to discovery (1.0). Work on trial exhibit binders (2.8).	ARCH
1368.002	01/30/2019	44	A	9	250.00	5.50	1,375.00 Review Wendy's and Stan's MIL (1.5); draft response to Stan's MIL (1); draft response to Wendy's omnibus MIL (2); begin draft opp to MIL re prior bad acts (1)	ARCH
1368.002	01/30/2019	1	A	9	400.00	5.00	2,000.00 (50%) Work on trial statement (.5). Work on responding to Commissioner Ayres' recommendation to produce documents on specified categories in Wendy's RFPs (4.8). Work on settlement with Todd and Don (1.1). Pre-deposition conference with Jessica Clayton (.5). Attend Jessica Clayton deposition (.4). Modify Todd's responses to Wendy's and Stan's motions in	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	01/31/2019	19	A	9	110.00	5.30	583.00	ARCH
1368.002	01/31/2019	44	A	9	250.00	5.25	1,312.50	ARCH
1368.002	01/31/2019	1	A	9	400.00	6.75	2,700.00	ARCH
1368.002	02/01/2019	19	A	9	110.00	5.50	605.00	ARCH
1368.002	02/01/2019	44	A	9	250.00	4.20	1,050.00	ARCH
1368.002	02/01/2019	1	A	9	400.00	6.45	2,580.00	ARCH
1368.002	02/02/2019	19	A	9	110.00	2.50	275.00	ARCH
1368.002	02/02/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.002	02/02/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/03/2019	19	A	9	110.00	3.80	418.00	ARCH
1368.002	02/03/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/04/2019	19	A	9	110.00	6.00	660.00	ARCH
1368.002	02/04/2019	44	A	9	250.00	4.25	1,062.50	ARCH
1368.002	02/04/2019	1	A	9	400.00	3.52	1,408.00	ARCH
1368.002	02/05/2019	19	A	9	110.00	5.30	583.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #	
Client ID 1368.002 Jaksick/Todd									
							documents/information for Kent Robison (1.0). Work on documents/information/exhibits for Mark Ivey (2.5). Update working exhibits for Kent Robison (.8).		
1368.002	02/05/2019	44	A	9	250.00	1.00	250.00	Attend PTC Hearing	ARCH
1368.002	02/05/2019	1	A	9	400.00	3.75	1,500.00	(50%) Review motions and cases regarding prior bad acts motion in limine to prepare for argument (2.1). Appearance in court with Judge Hardy regarding ruling on motion to continue (1.4). Attend and participate in settlement efforts with Stan's counsel and Wendy's counsel (2.2). Start review, highlighting, and study of Wendy's marked exhibits 400 - 457 (1.8).	ARCH
1368.002	02/06/2019	19	A	9	110.00	5.00	550.00	Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (1.0). Continue with review and revision of exhibits (1.5). Prepare documents/information for Mark Ivey (1.5).	ARCH
1368.002	02/06/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/07/2019	1	A	9	400.00	1.90	760.00	(30%) Jury list scrutiny analysis (2.0). Charts (2.2). Conference with Don and Todd - trial preparation (1.2). Prepare and file clarification regarding exhibits (1.0).	ARCH
1368.002	02/07/2019	19	A	9	110.00	4.80	528.00	Multiple conferences with Kent Robison (1.3). Locate and prepare documents/information for Kent Robison (1.0). Attend conference with Kent Robison and Lattin (.5). Work on new exhibits (1.0). Meet with Mark Ivey and prepare documents/information for him (1.0).	ARCH
1368.002	02/08/2019	19	A	9	110.00	5.60	616.00	Multiple conferences with Kent Robison to review assignments (1.3). Locate and prepare documents/information for Kent Robison (.8). Review and revise trial exhibit binders and indexes (1.0). Assist with documents/information for charts (1.0). review jury list (.5). Locate and organize depositions (1.0).	ARCH
1368.002	02/08/2019	44	A	9	250.00	1.50	375.00	Draft answers to supplement (1); trial prep (0.5)	ARCH
1368.002	02/08/2019	1	A	9	400.00	3.20	1,280.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/09/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/10/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/11/2019	19	A	9	110.00	4.50	495.00	Review and respond to Kent Robison emails (.2). Print and organize charts (.8). Work on location and organization of depositions for trial (1.5). Work on new exhibits for Lattin (.5). Continue with review and revision of trial exhibit and indexes (1.5).	ARCH
1368.002	02/11/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/12/2019	19	A	9	110.00	5.10	561.00	Multiple conferences with Kent Robison to review status and assignments (1.3). Work on charts (1.0). Work on review and revision of trial exhibits (1.0). Locate and prepare documents/information for Kent Robison (.8). Work on Kent Robison trial book (1.0).	ARCH
1368.002	02/12/2019	44	A	9	250.00	3.00	750.00	Review Wendy affidavit (0.5); draft response to affidavit (1.5); edit (1)0.5); further prep (0.5)	ARCH
1368.002	02/12/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/13/2019	19	A	9	110.00	4.90	539.00	Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information for Kent Robison (.8). Attend conference with Kent Robison, Lattin, client (1.3). Prepare jury selection board (1.0). Prepare and send documents/information to Mark Ivey (.5). Work on Kent Robison trial book (.5).	ARCH
1368.002	02/13/2019	19	A	9	110.00	6.30	693.00	Multiple conferences with Kent Robison to review status (1.0). Attend and assist with jury selection (4.3). Locate and prepare documents/information for tomorrow (1.0).	ARCH
1368.002	02/13/2019	44	A	9	250.00	3.00	750.00	Hearing on MIL (2.25), meeting with client (.75)	ARCH
1368.002	02/13/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/14/2019	44	A	9	250.00	4.00	1,000.00	Jury selection	ARCH
1368.002	02/14/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/15/2019	19	A	9	110.00	5.50	605.00	Multiple conferences with Kent Robison to review status (1.0). Prepare for and attend opening (4.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.002	02/15/2019	44	A	9	250.00	3.25	812.50	Trial (2.25); begin draft mtns for DV re release and damages (1.5)	ARCH

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Client ID 1368.002 Jaksick/Todd									
1368.002	02/15/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/16/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/17/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/18/2019	19	A	9	110.00	1.60	176.00	Prepare original depositions for court (.8). Review and revise exhibit binders (.8).	ARCH
1368.002	02/18/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/19/2019	19	A	9	110.00	5.60	616.00	Multiple conferences with Kent Robison to review assignments (.8). Telephone conference with Todd Alexander and prepare and send documents/information (.5). Attend portions of trial (1.5). Update exhibit books with new exhibit (.8). Locate and prepare documents/information for tomorrow (1.0).	ARCH
1368.002	02/19/2019	44	A	9	250.00	4.50	1,125.00	Trial	ARCH
1368.002	02/19/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/20/2019	19	A	9	110.00	5.10	561.00	Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents/information for Kent Robison (1.0). Deliver documents/information/exhibits to Kent Robison and courthouse (1.0). Revise/update/exhibit binders (1.0). Locate and prepare documents/information/exhibits for tomorrow (1.3).	ARCH
1368.002	02/20/2019	44	A	9	250.00	4.50	1,125.00	Jury trial (1); review Stan depo testimony and outline topics for KRR (3.5)	ARCH
1368.002	02/20/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/21/2019	19	A	9	110.00	5.30	583.00	Work on Kent Robison binders of Todd exhibits (1.0). Multiple conferences with Kent Robison to review status (1.0). Attend trial (2.5). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.002	02/21/2019	44	A	9	250.00	3.00	750.00	Review Wendy Depo Testimony	ARCH
1368.002	02/21/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/22/2019	19	A	9	110.00	5.00	550.00	Multiple conferences with Kent Robison to review status (1.0). Locate and review documents/information for Kent Robison (1.0). Attend trial (3.0).	ARCH
1368.002	02/22/2019	44	A	9	250.00	5.00	1,250.00	Trial (3); further review of Wendy depo (2)	ARCH
1368.002	02/22/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/23/2019	1	A	9	400.00	1.60	640.00	(40%) Trial preparation.	ARCH
1368.002	02/24/2019	1	A	9	400.00	2.00	800.00	(40%) Trial preparation.	ARCH
1368.002	02/25/2019	19	A	9	110.00	5.80	638.00	Multiple conferences with Kent Robison to review status (1.0). Prepare documents/information/exhibits for today's witnesses (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	ARCH
1368.002	02/25/2019	44	A	9	250.00	5.00	1,250.00	Trial	ARCH
1368.002	02/25/2019	1	A	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.002	02/26/2019	1	P	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	622
1368.002	02/26/2019	19	P	9	110.00	5.80	638.00	Multiple conferences with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibits for Kent Robison (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	628
1368.002	02/26/2019	44	P	9	250.00	4.25	1,062.50	draft motion for directed verdict (1); attend trial (3.25)	633
1368.002	02/27/2019	1	P	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	623
1368.002	02/27/2019	19	P	9	110.00	6.40	704.00	Multiple conference with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibit for Kent Robison & Lattin (1.3). Attend trial (3.3). Locate & prepare documents/information/exhibit for tomorrow (.8).	629
1368.002	02/27/2019	44	P	9	250.00	4.50	1,125.00	Attend Trial	634
1368.002	02/28/2019	1	P	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	624
1368.002	02/28/2019	19	P	9	110.00	6.00	660.00	Multiple conferences with Kent Robison to review status & assignments (1.2). Locate & prepare documents/information/exhibits for Kent Robison (1.3). Attend trial (2.5). Prepare	630



Date: 03/11/2019

**Detail Fee Transaction File List**  
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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 1368.002 Jaksick/Todd</b>								
1368.002	02/28/2019	44	P	9	250.00	5.25	1,312.50	documents/information/exhibits for tomorrow (1.0). Attend trial (4.5); review jury instructions (0.75) 635
1368.002	03/01/2019	1	P	9	400.00	4.00	1,600.00	(40%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial. 625
1368.002	03/01/2019	19	P	9	110.00	5.30	583.00	Multiple conferences with Kent Robison to review assignments (1.5). Locate & prepare documents/information/exhibits for Kent Robison (.8). Attend trial (2.0). Work on charts, documents, information exhibits for tomorrow (1.0). 631
1368.002	03/01/2019	44	P	9	250.00	4.50	1,125.00	Attend trial (2); meet and confer re instructions (1); begin brief on jury instructions (1.5) 636
1368.002	03/02/2019	1	P	9	400.00	1.60	640.00	(40%) Trial preparation. 626
1368.002	03/02/2019	44	P	9	250.00	1.50	375.00	draft brief on jury instructions 637
1368.002	03/03/2019	1	P	9	400.00	2.32	928.00	(40%) Trial preparation. 627
1368.002	03/03/2019	44	P	9	250.00	1.75	437.50	Review Wendy's supplemental instructions (0.5); edit jury instruction brief (1); draft competing discovery rule instruction (0.25) 638
1368.002	03/04/2019	19	P	9	110.00	6.50	715.00	Multiple conferences with Kent Robison regarding status & assignments (1.5). Prepare documents/information/exhibits/charts for closing (1.0). Locate & prepare documents/information for Kent Robison (1.0). Attend trial (2.0). Wait for verdict (1.0). 632
1368.002	03/04/2019	44	P	9	250.00	7.50	1,875.00	Attend trial 639
1368.002	03/04/2019	1	P	9	400.00	5.40	2,160.00	(40%) Worked on diagrams for closing. (.9). Worked on review of exhibits to show during closing (.8). Reviewed and analyzed Petitioners power point slides.(.7). Instruction changes and work with court. (1.9) Closing arguments (5.6). Jury deliberation and appear for jury question and taking verdict. (4.4). 642
1368.002	03/06/2019	44	P	9	250.00	0.50	125.00	outline next steps 640
1368.002	03/07/2019	44	P	9	250.00	0.50	125.00	meeting with client 641
<b>Total for Client ID 1368.002</b>					<b>Billable</b>	<b>1,472.40</b>	<b>328,597.00</b>	<b>Jaksick/Todd (446) Jaksick Family Trust</b>
<b>GRAND TOTALS</b>								
					<b>Billable</b>	<b>1,472.40</b>	<b>328,597.00</b>	

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**EXHIBIT 10**

**EXHIBIT 10**

From 8/30/18 - Present 445

Date: 03/11/2019

Detail Fee Transaction File List  
Robison, Sharp, Sullivan & Brust

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	08/30/2018	1	A	9	400.00	0.95	380.00 (50%) Evaluated Connot's push back letter and started draft of response (.7). Work on deposition schedule (.3). Start draft of reply to motion to terminate and opposition to motion for sanctions (.9).	ARCH
1368.001	08/30/2018	19	A	9	110.00	3.30	363.00 Telephone conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5).	ARCH
1368.001	08/30/2018	44	A	9	250.00	1.00	250.00 Analyze re whether can object to subpoena issued to Hascheff (0.2); respond to email re termination of deposition (0.2); review opposition to motion to terminate deposition (0.6)	ARCH
1368.001	08/31/2018	19	A	9	110.00	1.80	198.00 Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Update documents/exhibit/indexes (.3).	ARCH
1368.001	08/31/2018	44	A	9	250.00	2.00	500.00 Outline reply (0.5); research re termination of depositions (0.5); begin draft reply (1)	ARCH
1368.001	09/04/2018	19	A	9	110.00	4.30	473.00 Locate and prepare documents/information/exhibits for 30(b)(6) depositions (.8). Multiple conferences with Kent Robison to review status (1.0). Locate and prepare additional documents/information/exhibits for Kent Robison (1.0). Print and prepare documents/information from client (.5). Begin review of new Stan documents (5K pages) (1.0).	ARCH
1368.001	09/04/2018	44	A	9	250.00	0.50	125.00 continue draft reply	ARCH
1368.001	09/04/2018	1	A	9	400.00	3.40	1,360.00 (50%) Prepare for and took deposition of Stan Jaksick as 30(b)(6) witness for Toiyabe and 30(b)(6) witness for Jaksick Family LLC. Post deposition conferences with Adam and Don regarding more efficient way to obtain 30(b)(6) information through accountant. Email confirmation. Conference with Don and Adam regarding potential initiation of settlement discussions. Update all deposition exhibit binders (.5). Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Prepare documents for production (.5).	ARCH
1368.001	09/05/2018	19	A	9	110.00	2.00	220.00 emails re depositions (0.2); finish reply ISO mtn to terminate (0.5)	ARCH
1368.001	09/05/2018	44	A	9	250.00	0.70	175.00 (50%) Work on rescheduling 30(b)(6) depositions. Telephone conference with Don Lattin regarding availability of Kevin Riley to answer 30(b)(6) questions. Email traffic to Adam and Don regarding initiation of settlement negotiations. Receive Todd's outline and incorporate outline deal points into deposition questions for Pierre Hascheff.	ARCH
1368.001	09/06/2018	19	A	9	110.00	2.50	275.00 Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0).	ARCH
1368.001	09/06/2018	44	A	9	250.00	2.00	500.00 Review depo transcripts re agitated or improper comments, length of breaks, etc. (0.5); outline opp to motion to compel (0.5); began draft opp (1)	ARCH
1368.001	09/06/2018	1	A	9	400.00	0.50	200.00 (50%) Work on objections to interrogatories served on Todd (.4). Telephone conference with Pierre Hascheff's office regarding confirmation of deposition for 9/14/18 (.3). Process amended notice of deposition for Judge Hascheff (.3).	ARCH
1368.001	09/06/2018	1	A	9	400.00	0.90	360.00 (50%) Request to help with response to 30(b)(6) notices on Todd. Email to Don to be directed and forwarded to Kevin, requesting documents for Todd entities similar or identical to those produced by Stan for Stan entities. Commence review of Stan's deposition testimony regarding tracing of \$400,000 Bronco Billy proceeds and \$434,000 Bronco Billy proceeds to determine whether discouragement or reimbursement is appropriate.	ARCH
1368.001	09/07/2018	19	A	9	110.00	1.50	165.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0). Telephone conference with expert Green (.3).	ARCH
1368.001	09/07/2018	44	A	9	250.00	1.50	375.00 Finish draft opp (0.75); edit reply to match opp (0.75)	ARCH
1368.001	09/10/2018	19	A	9	110.00	4.30	473.00 Multiple conferences with Kent Robison to review status and deposition preparation (1.2). Attend conference with Kent Robison, client, Lattin (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.3). Print and process documents/information from client (.3). Locate and	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	09/10/2018	1	A	9	400.00	4.00	1,600.00	ARCH
							prepare documents/information for Kent Robison conference with Todd Alexander (1.0). (50%) Review Wendy's transcripts regarding accusations that Todd murdered his father (.6). Review documents provided to office by Todd regarding Sam's interactions and deals with Jamison (1.2). Organize exhibits for Jamison deposition (.4). Office conference with Todd to prepare for Jamison deposition (.8). Participate in taking deposition of Dave Jamison (4.1). Conference with Don Lattin regarding effect if any of Jamison's role (.4). Telephone conference with Todd Alexander regarding representation of Pierre Haschef (.4). Work on obtaining dates for mediation from Judge Gamble and Bob Isenberg (.1)	
1368.001	09/11/2018	1	A	9	400.00	2.00	800.00	ARCH
							(50%) Office conference with Todd Jaksick to review pertinent documents and exhibits to be used for Pierre Haschef's deposition (3.2). Office conference with Todd Alexander, counsel for Pierre Haschef, to enlighten and educate Todd with respect to pleadings, allegations, accusations, and documents relevant to Pierre's involvement with Jaksick family and Todd (.8).	
1368.001	09/12/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.3). Update deposition exhibit binders (.3). Locate and prepare documents/information/exhibits for Pierre deposition (1.5). Locate and prepare documents/information for and attend telephone conference with Kent Robison and expert Green (.5).	
1368.001	09/13/2018	19	A	9	110.00	3.80	418.00	ARCH
							Multiple conferences with Kent Robison to review assignments and prepare for upcoming depositions (1.5). Locate and prepare additional documents/information/exhibits for Pierre deposition (1.8). Locate documents/information for expert Green (.3). Locate, prepare and send documents/information to Todd Alexander (.3).	
1368.001	09/13/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Prepare for meet and confer with Texas counsel regarding discovery issues, including request for production of documents, subpoena duces tecum, and Todd's deposition. Participate in meet and confer with counsel regarding discovery issues. Work on reply to motion to terminate and motion to challenge pro hac vice admission. Analyze water right deeds provided by Jessica.	
1368.001	09/14/2018	19	A	9	110.00	3.40	374.00	ARCH
							Locate and prepare additional documents/information/exhibits for Pierre deposition (.8). Attend multiple conferences with Kent Robison, Lattin, client regarding deposition documents/information (1.5). Update deposition exhibit binders (.3). Review new documents from client (.8).	
1368.001	09/14/2018	1	A	9	400.00	9.20	3,680.00	ARCH
							Assemble new exhibits with Jim Stewart for deposition of Pierre Haschef. Took deposition of Pierre Haschef regarding indemnification, creation, evolution, and ultimate ownership of Lake Tahoe House by Incline TSS Ltd. Took Judge Haschef's deposition regarding all issues alleged in petition pertaining to Todd individually. Debrief with Don Lattin and Todd Alexander and Todd Jaksick.	
1368.001	09/17/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Update deposition roster and indexes (.5). Locate and prepare documents/information/exhibits for motion (.8).	
1368.001	09/17/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Work on reviewing documents provided by Kevin Riley to Adam responsive to Todd's 30(b)(6) notice requests (.3). Email Don Lattin requesting Kevin provide same to Adam for 30(b)(6) noticed for Todd (.2). Work on stipulation to extend expert disclosures and discovery cutoff by and through court approved stipulation (.3). Work on demand for indemnification from Issue Trust and Family Trust for legal fees (.4).	
1368.001	09/18/2018	19	A	9	110.00	1.50	165.00	ARCH
							Conference with Kent Robison to review status (.5). Update deposition exhibit and transcript binders (.5). Update Kent Robison working document binders (.5).	
1368.001	09/19/2018	19	A	9	110.00	0.50	55.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.3).	
1368.001	09/19/2018	1	A	9	400.00	1.20	480.00	ARCH
							Prepare for meeting with Todd Jaksick to review status of production for companies and trusts. Work on conceptual components of demand letter to obtain payment from Family Trust for Todd's fees and costs. Work conceptually on petition to compel Stan to refund	

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Client ID 1368.001 Jaksick/Todd								
1368.001	09/20/2018	19	A	9	110.00	1.70	187.00	ARCH
							\$400,000 of Bronco Billy's funds and \$434,000 used to pay loans owed by Family Trust to Lakeridge. Telephone conference with Don Lattin. Conference with Kent Robison to review status (.2). Update deposition exhibit binders (.2). Review Pierre deposition (1.0). Prepare documents/information/exhibits for upcoming 30(b)(6) depositions (.3).	
1368.001	09/21/2018	1	A	9	400.00	1.15	460.00	ARCH
							(50%) Receive and review Jamison deposition summary for purposes of determining whether lawsuit for defamation should be processed (.4). Develop a chronology of 30(b)(6) documents produced and began reviewing documents produced by Kevin Riley to Stan's counsel responsive to 30(b)(6) depositions (.9). Continue providing outline information regarding Stan's use of \$400,000 and \$434,000 of Bronco Billy sale proceeds (.6). Draft demand letter for return of funds (.4).	
1368.001	09/21/2018	1	A	9	400.00	0.40	160.00	ARCH
							(50%) Email to and from Mark Knought regarding acceptance of service of subpoena duces tecum on Jessica and Nanette. Telephone conference with Todd Jaksick regarding documents produced for Toiyabe Investment Company. Review of documents produced for TIC with Jessica and Todd. Telephone conference with Don regarding Knought's position that Hascheff's future deposition cannot be scheduled until motion to terminate is decided and work on draft of letter responding to Knought's unreasonable position.	
1368.001	09/24/2018	19	A	9	110.00	2.30	253.00	ARCH
							Review & print new documents from Riley (.3). Conference with Kent Robison to review status & assignments (.5). Locate & prepare documents/information/exhibits for Indemnity Agreement/Fee Demand (1.2). Prepare & send documents/information to client (.3).	
1368.001	09/24/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Office conference with Todd regarding corrections to deposition (.8). Review all of Todd's suggested changes (.5). Start notice of corrections format (.3).	
1368.001	09/25/2018	19	A	9	110.00	2.30	253.00	ARCH
							Locate & prepare documents/information/testimony for fee letter (1.0). Attend conference with Kent Robison, Therese Shanks, client (1.0). Locate & prepare documents/information for Kent Robison (.3).	
1368.001	09/25/2018	1	A	9	400.00	2.70	1,080.00	ARCH
							Office conference with Jessica and Todd to review proposed petition for reconveyance of \$400,000 and \$434,000. Review some of the documents scrutinized by Jessica revealing loan transactions between Trust and Lakeridge and Lakeridge and Toiyabe Golf Club. Review Jessica's schedule of what documents were produced for which entities in response to our 30(b)(6) depositions. Work on more specific opposition to subpoena duces tecum and 30(b)(6) notice of Duck Lake.	
1368.001	09/26/2018	19	A	9	110.00	1.10	121.00	ARCH
							Conference with Kent Robison to review assignments (.3). Locate and prepare documents/information for Kent Robison (.8).	
1368.001	09/26/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Meeting with Don and Todd to review need for petition for instructions. Work on letter requesting fees be paid by Family and/or Issue Trust.	
1368.001	09/27/2018	19	A	9	110.00	1.80	198.00	ARCH
							Review deposition changes/corrections from client (.3). Update all document binders and indexes (1.0). Begin organization of documents/information/exhibits not used for depositions (.5).	
1368.001	09/27/2018	44	A	9	250.00	0.50	125.00	ARCH
							Review emergency motion to continue the trial and extend discovery	
1368.001	09/27/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Continue work on petition for reconveyance of proceeds diverted by Stan consisting of Bronco Billy's \$400,000 (.8). Telephone conference with Don regarding Kevin's position on 434 being a payment on a loan owed by Family Trust to Lakeridge (.4).	
1368.001	09/28/2018	19	A	9	110.00	1.50	165.00	ARCH
							Review and organize documents/information prepped for but not marked for depositions (potential trial exhibit) (1.0). Update documents and deposition exhibit binders (.5).	
1368.001	10/01/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Revise objections to subpoena duces tecum (.3). Work on reviewing Judge Hascheff's deposition for testimony supporting Todd's interpretation of indemnification agreement (.2). Start draft of demand that Family Trust indemnify and/or pay Todd's legal fee and costs (.7).	
1368.001	10/01/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and	

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Client ID 1368.001 Jaksick/Todd								
1368.001	10/02/2018	19	A	9	110.00	2.00	220.00 assignments (.5). Update deposition and document binders and indexes (.8). Locate and prepare documents/information for Kent Robison (.5). Continue with review and organize of potential trial exhibits (1.0). Conference with Kent Robison to review status (.5). Review Todd's corrections to all deposition transcripts (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/02/2018	44	A	9	250.00	2.00	500.00 Research re diligence in conducting discovery for continuances (0.5); draft opposition to motion to continue trial (1.3); edit (0.2)	ARCH
1368.001	10/02/2018	1	A	9	400.00	0.60	240.00 (50%) Continue review with Todd and Jim of deposition testimony to prepare notice of corrections for all four versions (.8). Continue drafting demand for payment of fees by looking at all time charged and narratives reviewed (.4).	ARCH
1368.001	10/02/2018	1	A	9	400.00	0.50	200.00 (50%) Receive comments from Don Lattin regarding petition for reconveyance of funds diverted by Stanley of Bronco Billy's proceeds (.5). Inter-office conference with Therese to incorporate changes to reinstate 434 based upon Kevin Riley's expected testimony (.5).	ARCH
1368.001	10/03/2018	1	A	9	400.00	1.40	560.00 (50%) Continue to review and scrutiny of testimony from Pierre Hascheff concerning Sam Jaksick's intent that Todd be indemnified from Family Trust for attorney's fees and all claims against him (.8). Work on discovery issues being expressed by Todd Alexander, Mark Connot and Adam Hosmer-Henner concerning continue deposition for Judge Hascheff (.6). Work on more detailed responses and production of documents for subpoena duces tecum to Nanette and Jessica (.7). Work on including insertions concerning \$434,000 dollar misappropriation by Stan into Todd's petition for refund (.7).	ARCH
1368.001	10/03/2018	19	A	9	110.00	2.10	231.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft Notice of Corrections to depositions for Todd (1.0).	ARCH
1368.001	10/04/2018	19	A	9	110.00	2.30	253.00 Conference with Kent Robison to review status (.5). Work on draft deposition corrections notices for Todd (1.0). Update document indexes (.5). Locate and send documents/information for client (.3)	ARCH
1368.001	10/05/2018	19	A	9	110.00	2.40	264.00 Conference with Kent Robison to review status (.3). Review and revise deposition notice corrections (.8). Update deposition roster and indexes (.3).	ARCH
1368.001	10/08/2018	19	A	9	110.00	0.80	88.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/08/2018	1	A	9	400.00	1.80	720.00 (50%) Office conference with Todd Jaksick and Don Lattin regarding discovery issues, expert designation, and request from Wendy's lawyers to continue dates and trial. Work on opposition to emergency motion to extend discovery. Continue to review with Todd regarding corrections to depositions and clarifications to non-sensical answers.	ARCH
1368.001	10/09/2018	1	A	9	400.00	1.85	740.00 (50%) Work on Supplemental Objections to Nanette & Jessica's SDTs (1.2). Work on Memo to Todd Alexander re: Pierre's continued deposition (1.1). Work with Todd to assemble Hascheff documents for inspection (.6). Communicate to counsel availability of Hascheff's documents available for inspection (.8).	ARCH
1368.001	10/10/2018	19	A	9	110.00	2.10	231.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Prepare additional information for Notice of Deposition Corrections (.3). Locate, prepare and send documents/information to Kent Robison (.5). Begin preparation for documents reviewed by Hosmer for production (1.0).	ARCH
1368.001	10/11/2018	19	A	9	110.00	1.80	198.00 Telephone conference with Kent Robison to review status (.3). REview Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/11/2018	19	A	9	110.00	1.80	198.00 Telephone conference with Kent Robison to reivew status (.3). Review Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/11/2018	44	A	9	250.00	0.50	125.00 review motion to compel	ARCH
1368.001	10/12/2018	1	A	21			0.00 Write off finance charges	ARCH
1368.001	10/12/2018	19	A	9	110.00	1.80	198.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on deposition notice corrections with Kent Robison (1.0).	ARCH

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Client ID 1368.001 Jaksick/Todd 1368.001	10/12/2018	1	A	9	400.00	2.50	1,000.00 (50%) Office conference with Nanette to review notary book (.8). Made exhibits from pages of Nanette's notary book (.4). Confer with Todd regarding decisions to pay Ag Credit (.4). Telephone conference with Don and Todd and office conference regarding demand on Phil Kreitlin to authorize payment to Ag Credit and for Stan to produce accountings for sales of Montreaux lots in light of Family Trust interest in proceeds therefrom (.8). Prepare indemnification payment for fees demand letter by review of indemnification agreement provisions (.5). Stan's testimony (.4). Wendy's testimony regarding indemnification (.4). Draft Todd's declaration (.4). Review Hascheff testimony to include in demand (.5). Revise letter to MCL citing above as support for Trust and Issue Trust to pay legal fees charged to Todd by RSSB (.4).	ARCH
1368.001	10/15/2018	19	A	9	110.00	1.40	154.00 Work on documents/information to supplemental 16.1 disclosure (.3). Review and revise deposition corrections (.3). Revise document index detailed descriptions (.8).	ARCH
1368.001	10/16/2018	1	A	9	400.00	1.70	680.00 (50%) Office conference with Todd regarding sanction order, discuss all pending discovery issues, telephone conference with Don Lattin, review documents requested from Pierre's file.	ARCH
1368.001	10/16/2018	19	A	9	110.00	3.10	341.00 Conference with Kent Robison to review assignments (.3). Review/organize boxes of documents from client for upcoming inspection (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on detailed document indexes (1.0).	ARCH
1368.001	10/16/2018	44	A	9	250.00	1.00	250.00 Review order (0.2); research re potential reconsideration basis (0.2); begin outline to opposition to motion to compel (0.8)	ARCH
1368.001	10/17/2018	19	A	9	110.00	2.60	286.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Work on documents to be produced (organize and locate) (1.0). Continue with review and revision of detailed indexes (1.0). Locate, prepare and send documents/information to Kent Robison (.3).	ARCH
1368.001	10/18/2018	1	A	9	400.00	1.55	620.00 (50%) Office conference with Todd to review methods by which responses could be made to subpoena duces tecum. Review in detail subpoenas and topics with Todd. Continue review of the 526 RFPs to see if any manageable strategy or procedure could be implemented to draft a response. Review notary book and modify objection to subpoena duces tecum. Work on preparing Todd for additional topics that will be addressed and covered in continued deposition.	ARCH
1368.001	10/19/2018	1	A	9	400.00	0.80	320.00 (50%) Work on scheduling Pierre Hascheff's deposition. Participate with Don and Todd in preparing for pending discovery fight and upcoming meeting with Commissioner Ayres.	ARCH
1368.001	10/22/2018	1	A	9	400.00	0.90	360.00 (50%) Start draft of motion for protective order on all outstanding discovery issues. Research Rule 37 regarding burdens to obtain protective order. Start itemizing individual discovery requests made by Wendy's counsel. Continue to review methodology by which Jessica's emails could be identified and possibly produced.	ARCH
1368.001	10/22/2018	19	A	9	110.00	1.80	198.00 Review emails from Kent Robison regarding assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Begin review of Hascheff documents (6K pages) (.8). Continue with detailed descriptions in document indexes (.5).	ARCH
1368.001	10/23/2018	50	A	8	220.00	2.00	440.00 Research caselaw re: motion for protective order & abusive discovery.	ARCH
1368.001	10/23/2018	19	A	9	110.00	2.50	275.00 Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information/exhibits for protective order (1.5). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	10/23/2018	44	A	9	250.00	4.00	1,000.00 Outline opposition to motion to compel (1); segregate irrelevant requests into specific topic groups (1); draft opposition re facts and standard of review (2); draft opposition to motion to compel re claims on estate administration (1); draft opposition re mental capacity requests (1); begin draft opposition re financial requests (1)	ARCH
1368.001	10/23/2018	1	A	9	400.00	2.20	880.00 (50%) Work on opposition to motion to compel and cross-motion for protective order by analyzing the shear	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	10/24/2018	19	A	9	110.00	1.90	209.00	ARCH
1368.001	10/24/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.001	10/24/2018	1	A	9	400.00	1.70	680.00	ARCH
							number of requests made by Wendy in RFPs, SDTs, and similar requests of Nanette, Jessica, Pierre and Bob Lagoy (1.4). Draft overview and prepare chart for inclusion, motion for protective order (.5). Review allegations and accusations in Wendy's amended counter-petition to compare with relevance of specified requests (.8). Work on determining how many emails are in Jessica's "system" that would have to be reviewed in order to be responsive to the subpoena duces tecum (1.7).	
							Update deposition roster and indexes (.3). Continue with review of 6K pages of Hascheff documents (.8). Continue with revision of detailed document indexes (.8).	
							continue draft opp re financial requests (50%) Telephone conference with Don Lattin (.3). Review disclosure forms produced by Don to allow Kevin Riley to testify concerning Duck Lake Flat, LLC, White Pine, LLC, Home Camp, LLC without tax returns (.3). Telephone conference with Todd regarding disclosure forms (.3). Office conference with Todd to review Duck Lake, LLC documents and financials included in 30(b)(6) production (.6). Work with Todd to prepare for second round of deposition with review of material recovered by Kevin Spencer and forecast of additional topics to be covered in next session (.8). Receive and review and discuss with client Judge Hardy's order addressing motion to extend discovery, expert deadlines, and trial (.3). Commence work on status conference statement for Todd regarding abuse of discovery tactics to be presented at November 16, 2018 hearing (.4). Work on and complete Todd's response to Wendy's fifth request for production of documents (.4).	
1368.001	10/25/2018	44	A	9	250.00	2.70	675.00	ARCH
1368.001	10/25/2018	19	A	9	110.00	4.00	440.00	ARCH
1368.001	10/25/2018	1	A	9	400.00	0.90	360.00	ARCH
							draft opp re 6th requests (2); incorporate KRR edits into opp (0.7)	
							Conference with Kent Robison to review status and assignments (.5). Prepare documents/information for Rile deposition (.5). REview 4 days of Todd deposition testimony for information for Kent Robison (3.0).	
							(50%) Continue draft of opposition to motion to compel and counter-motion for active order, including numerical analysis of 1,819 requests served on Todd and Todd Associates (Jessica, Bob Legoy, and PRN Kevin). Continue work on status conference statement to be submitted on behalf of Todd individually for both cases. Continue to review documents Kevin produced to Todd responsive to 30(b)(6) topics according to and formal agreement with Adam.	
1368.001	10/26/2018	44	A	9	250.00	1.25	312.50	ARCH
1368.001	10/29/2018	19	A	9	110.00	2.80	308.00	ARCH
1368.001	10/29/2018	1	A	9	400.00	5.10	2,040.00	ARCH
							Draft opp/motion re sanctions (0.5); edit opp/cntrmtn (0.75)	
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for kent Robison (.8). Locate nd copy 30(b)(6) documents/usb for production to Adam (.5). Update document indexes (.5). Continue with review of Hascheff documents (.5).	
							(50%) Prepare for Kevin Riley deposition by review of accountings and documents provided from 30(b)(6) request (1.2). Office conference with Todd and Don to prepare for Kevin's testimony (1.6). Attend deposition of Kevin Riley (6.9). Post deposition debrief with client and Don regarding accounting issues raised by Adam in examination of Kevin Riley (.5).	
1368.001	10/30/2018	19	A	9	110.00	2.30	253.00	ARCH
1368.001	10/30/2018	1	A	9	400.00	4.90	1,960.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for depositions (Riley and Todd) (.8). Continue with review of Hascheff documents (1.0).	
							(50%) Prepare for and attend deposition of accountant Kevin Riley (4.2). Confer with client to prepare for client's deposition in light of Riley testimony (1.1). Attend and defend deposition of Todd Jaksick (3.7). Post deposition review of testimony and exhibits with Todd and debriefing after deposition testimony (.8).	
1368.001	10/31/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	10/31/2018	19	A	9	110.00	2.10	231.00	ARCH
							Incorporate client edits and final edits to opp mtn/countermtn	
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for today's depositions (.8). Update exhibits on system (.5). Work on revisions to detailed document indexes (.5).	



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1368.001	Jaksick/Todd	10/31/2018	1	A	9	400.00	4.10	1,640.00 (50%) Prepare Todd for further deposition testimony (.8). Attend and defend Todd's deposition taken by Kevin Spencer (6.3). Post deposition debrief with client (1.1).	ARCH
1368.001		11/01/2018	1	A	9	400.00	0.80	320.00 (50%) Work on providing responses to Stan's request for admissions and responses to interrogatories (1.6)	ARCH
1368.001		11/01/2018	19	A	9	110.00	2.80	308.00 Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Review latest deposition exhibit, organize and index (1.0). Work on detailed document index (.8).	ARCH
1368.001		11/02/2018	19	A	9	110.00	1.80	198.00 Conference with Kent Robison to review status (.3). Organize and index deposition exhibits (original, working clean) (.8). Meet with court reporter regarding drop box for exhibits (.2). Continue with detailed document index (.5).	ARCH
1368.001		11/05/2018	1	A	9	400.00	0.70	280.00 (50%) Work on preparing answers/responses to Stanley's request for admissions (.3). Work on answers to interrogatories (.4). Submit both to Todd and Don for review (.1). Collaborate with Jim on responding to Stanley's two sets of request for production of documents (.6).	ARCH
1368.001		11/05/2018	19	A	9	110.00	2.10	231.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for Kent Robison meeting (.5). Continue with detailed document index (.8).	ARCH
1368.001		11/06/2018	44	A	9	250.00	1.00	250.00 Draft discovery responses (0.5); research re objections re admissions in discovery requests (0.5)	ARCH
1368.001		11/06/2018	19	A	9	110.00	3.40	374.00 Conference with Kent Robison to review status and assignment (.3). Assist with document information to respond to Stan's discovery requests (2.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for telephone conference with expert Green (.3).	ARCH
1368.001		11/06/2018	1	A	9	400.00	1.80	720.00 Draft answers with Todd regarding request for admissions regarding Issue Trust (.4). Draft series of explanations for Todd to understand reasons for denials and admissions and why some are misleading (.5). Telephone conference with Don regarding answers to our phase being limited strictly to Todd as an individual (.3). Letter to client requesting payment for legal services (.3). Review, analyze bills submitted to Todd for payment to determine if write offs are necessary (.3).	ARCH
1368.001		11/07/2018	19	A	9	110.00	2.50	275.00 Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Review and respond to client emails (.3). Begin review of Todd deposition Vol. 5 (.8). Work on next 16.1 supplement (.8).	ARCH
1368.001		11/08/2018	19	A	9	110.00	2.40	264.00 Telephone conference with Kent Robison to review status and assignments (.3). Work on responses to Stan's requests for production of documents (1.8). Prepare and send documents/information to Kent Robison (.3).	ARCH
1368.001		11/09/2018	19	A	9	110.00	2.40	264.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft discovery responses (.8). Locate and prepare documents for Judge Hascheff (.3). Update document indexes (.5).	ARCH
1368.001		11/09/2018	1	A	9	400.00	1.05	420.00 (50%) Office conference at Don Lattin's to confer with Don and Todd regarding issues raised by Wendy's counsel, ongoing discovery, experts analysis, and strategies on how to apply for or get fees paid.	ARCH
1368.001		11/12/2018	1	A	9	400.00	0.75	300.00 (50%) Prepare declaration in support of Todd's demand for fees (.4). Work on first draft of Todd's status conference statement outlining for Court's consideration magnitude of discovery disputes and magnitude of discovery requests (1.1).	ARCH
1368.001		11/13/2018	19	A	9	110.00	3.40	374.00 Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 production (.5). Prepare documents/information for Kent Robison (.5). Prepare for and attend conference with Kent Robison and client to work on discovery responses (1.8). Prepare and send documents/information to client (.3).	ARCH
1368.001		11/13/2018	1	A	9	400.00	0.80	320.00 Office conference with Todd to work on answers to interrogatories.	ARCH
1368.001		11/14/2018	19	A	9	110.00	4.00	440.00 Conference with Kent Robison to review draft discovery responses (1.0). Locate and prepare documents/information for Kent Robison (.5). Attend	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	11/14/2018	1	A	9	400.00	1.70	680.00	ARCH
							conference with Kent Robison and client to assist with documents/information for request for production responses (2.5).	
1368.001	11/15/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Work on supplement to opposition to motion to continue by including overview of discovery request showing chart of number of request for production, number of topics on subpoena duces tecum, number of interrogatories, request for admissions, compared to specific issues raised in counter-petitions (1.6). Review Todd's roles as Trustee of Issue, Trustee of Family, and as individual to restrict and limit issues pertaining to Todd as individual to finalize argument with curtailing discovery is better solution than continuing trial (1.8).	
1368.001	11/15/2018	19	A	9	110.00	1.50	165.00	ARCH
							(50%) Prepared for hearing reading briefs, etc. (1.2.) Motion to compel reviewed (.8). Prepare outline and index of discovery demands (.8). D. See emails and stuff to review for hearing (.2)	
1368.001	11/16/2018	44	A	9	250.00	1.50	375.00	ARCH
1368.001	11/16/2018	19	A	9	110.00	1.80	198.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Locate and prepare documents/information/exhibits for Hascheff deposition (.5). Begin work on draft trial exhibit index (.5).	
1368.001	11/16/2018	1	A	9	400.00	2.40	960.00	ARCH
							(50%) Pre-hearing conference with Don, Therese, Carolyn, and client regarding Court's status hearing. Present at Court's status conference. Discussions among counsel on how to proceed with Court's ruling as amended deadlines. Commence collaboration on who to use "two choices" for mediator - agree on Enzenberger and Gamble. Start work on motion to strike Wendy's new petition for exceeding 30 pages, filing without Court permission, and presenting redundant arguments to Court to influence Court at status conference.	
1368.001	11/17/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.001	11/19/2018	44	A	9	250.00	7.30	1,825.00	ARCH
							attend Pierre Hascheff Deposition	
1368.001	11/19/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference call re next steps with co-counsel (0.3); outline dispositive motion filing deadlines (1); finish opposition to motion to join (3); draft motion to strike (3)	
1368.001	11/20/2018	19	A	9	110.00	2.00	220.00	ARCH
							Telephone conference with Kent Robison to review status and assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Contact reporter regarding copy of hearing transcript (.3). Work on draft trial exhibit index (.8).	
1368.001	11/21/2018	19	A	9	110.00	2.60	286.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Review hearing transcript for information/deadlines (.3). Process deposition transcripts (.5). Work on trial exhibit index (1.0).	
1368.001	11/27/2018	50	A	9	220.00	0.30	66.00	ARCH
1368.001	11/27/2018	19	A	9	110.00	4.20	462.00	ARCH
							Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on draft trial exhibit index (.5). Process new deposition transcripts (.5). Prepare summary of claims for Kent Robison (.8).	
1368.001	11/28/2018	19	A	9	110.00	2.30	253.00	ARCH
							Review case plan w/ Kent Robison and Therese Shanks.	
1368.001	11/29/2018	50	A	9	240.00	2.00	480.00	ARCH
1368.001	11/29/2018	44	A	9	250.00	4.50	1,125.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (1.0). Prepare for and attend conference with Kent Robison and client to prepare discovery responses (1.8). Work on draft trial exhibit index (.3).	
1368.001	11/29/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft trial exhibit list/index (1.0). Update all document indexes (.5).	
							Meet w/ Kent, Therese, and Jim to discuss case strategy. Begin research for trial protocol re: claims for jury and claims for court.	
							Work on trial protocol (0.5); draft MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by statute of limitations (3.25); begin draft argument portion of MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by release (0.75)	
							Locate and prepare documents/information for Kent Robison (1.0). Conference with Kent Robison to review	

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Client ID 1368.001 Jaksick/Todd								
1368.001	11/29/2018	1	A	9	400.00	2.40	960.00	ARCH
							status (.3). Attend conference with Kent Robison, Therese Shanks, Hannah Fuetsch regarding trial protocol preparation (1.0). Locate and prepare documents/information/exhibits for Therese Shanks (.5).	
1368.001	11/30/2018	1	A	9	400.00	1.35	540.00	ARCH
							(50%) Office conference to prepare motions for summary judgment and related filings with Todd, Jessica and Don. Work on analysis of discovery requests to determine on Incline TSS documents and emails produced versus those that might not have been produced.	
1368.001	11/30/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.001	11/30/2018	19	A	9	110.00	1.30	143.00	ARCH
1368.001	12/03/2018	50	A	9	240.00	2.80	672.00	ARCH
							(50%) Continue work on answers to interrogatories propounded by Stan (.4). Revise and redraft responses to request for admissions (.3). Telephone conference with Don Lattin regarding sufficiency and adequacy of answers to RFA's and interrogatories (.4). Work on trial protocol statement (.3). Work on opposition to motion to compel regarding Jessica subpoena duces tecum (.6). Revise and draft introduction to motion to strike Wendy's petition (.4). Work on changes to opposition to motion to join indispensable party and finalize (.3).	
1368.001	12/03/2018	44	A	9	250.00	1.40	350.00	ARCH
1368.001	12/03/2018	19	A	9	110.00	1.00	110.00	ARCH
1368.001	12/03/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							Conference with Kent Robison to review status (.3). Work on trial exhibit index (.5). Locate and prepare documents/information for Kent Robison. (.5). Meet w/ Kent and Therese re: trial protocol statement. Research statutory claims and claims that go to the court for intro. Finish adding authority to trial protocol intro and standard for bifurcation.	
							Review trial protocol (0.2); finish MOTION FOR SUMMARY JUDGMENT re Stan (0.7); edit (0.5)	
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Kent Robison (.8).	
							(50%) Office conference with Todd and Jessica to have them assist in Todd's opposition to Wendy's motion to compel production (1.8). Work with Deb Harris on formulating methodology to ascertain number of emails in Jessica's system for AOL and Gmail concerning specified topics (1.1). Work with Deb on declaration to show Commissioner and Judge the fact that Jessica needs to review and possibly produce 46,000 emails (.8). Telephone conference with Jim Green regarding issues raised in handwriting samples (.7). Complete Todd's answers to 1st Set of Interrogatories regarding Family Trust (.6). Met and confer with Todd to finish Todd's answers to 1st Set of Interrogatories regarding Issue Trust (1.2)	
1368.001	12/04/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.001	12/04/2018	1	A	9	400.00	2.10	840.00	ARCH
							Draft MOTION FOR SUMMARY JUDGMENT re Wendy's claims	
							(50%) Continue draft of motion for summary judgment against Stanley (1.2). Assemble accumulated exhibits and testimony for draft of MSJ against Stan (1.4). Work on finalizing motion for summary judgment on Wendy's claims (.8). Work on assembling exhibits to motion from deposition exhibits and deposition testimony (.8).	
1368.001	12/05/2018	50	A	9	220.00	1.70	374.00	ARCH
1368.001	12/05/2018	19	A	9	110.00	2.40	264.00	ARCH
1368.001	12/05/2018	1	A	9	400.00	3.55	1,420.00	ARCH
							Revise trial protocol statement based on Kent's edits. Research statutes to include in trial protocol statement for statutory claims.	
							Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend telephone conference with Kent Robison and expert Green (1.0). Locate and prepare documents/information for Green (.3). Attend conference with Kent Robison and client (.3).	
							(50%) Complete final draft with attached exhibits of MSJ against Wendy (1.9). Finish final draft together with final review of exhibits and testimony of Todd's MSJ motion against Stan (2.2). Telephone conference with Jim Green; review each and every known to give Jim basis for reasons why known are in fact known signatures of Sam and/or Wendy; discuss matters to be included in Jim's expert witness report (2.1). Telephone conference with Mike Ivey regarding IT services for trial (.5). Review, finalize, proof read and change minor portions of Todd's opposition to Wendy's	

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Client ID 1368.001 Jaksick/Todd								
1368.001	12/06/2018	1	A	9	400.00	2.75	1,100.00	ARCH
							motion to join indispensable parties (.4). (50%) Continue development of trial protocol (.4). Work on 1st draft of discovery conference statement (.8). Work on and complete opposition to 40 party joinder motion (.6). Office conference with Todd regarding declarations for opposition (.5). Work on Jury Instructions (.9). Letters to expert regarding refinement of assignment (.8). Letter to MCL regarding fees (.5). Office conference with Jessica regarding deposition notice and details regarding Todd's involvement in various companies (.6). Motion in limine list prepared (.4).	
1368.001	12/06/2018	19	A	9	110.00	2.60	286.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for motion (.4). Locate and prepare documents/information/exhibits for discovery status report (1.2). Attend telephone conference with Kent Robison, Lattin and client (.3). Prepare documents/information for Kent Robison conference with client (.5).	
1368.001	12/07/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	12/07/2018	19	A	9	110.00	1.30	143.00	ARCH
							review new motions Conference with Kent Robison to review status (.3). Deliver courtesy copies of report to court (.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	12/07/2018	1	A	9	400.00	0.95	380.00	ARCH
							(50%) Review status of various discovery issues (.8). Draft Todd's (Trustee and Individually) discovery status report, revised, finalized and filed (1.1).	
1368.001	12/10/2018	1	A	9	400.00	1.20	480.00	ARCH
1368.001	12/10/2018	19	A	9	110.00	3.10	341.00	ARCH
							Loan agreement discovery. Telephone conference with Kent Robison to review status and assignments (.3). Work on 16.1 supplement (1.0). Locate, prepare and send documents/information to Kent Robison (.3). Locate and print Secretary of State information on all entities identified in our motion (1.5).	
1368.001	12/11/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							(50%) Office conference with Don and Todd to review pending motions and discovery including motion to compel regarding Jessica Clayton, Wendy's motion for leave to join indispensable parties, motion to strike Wendy's petition to redress Todd's MSJ against Wendy and Stan, Wendy's motion to compel regarding Childers and Legoy (.9). Review trial protocol statement with Todd (.3). Work on confirming settlement conference with Bob Enzenberger and reserving Sunshine Litigation offices (.3). Participate in discovery dispute conference with Commissioner Ayres (1.1). Debrief with Don and Todd (.2). Work on Jackrabbit Capital call (.2).	
1368.001	12/11/2018	19	A	9	110.00	1.90	209.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	
1368.001	12/12/2018	19	A	9	110.00	2.00	220.00	ARCH
							Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplemental document production (1.0).	
1368.001	12/12/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Draft Todd's second discovery dispute report based on participation in December 11th discovery dispute conference with Discovery Commissioner (1.2). Review law on out of state subpoena duces tecum and analyze Wendy's records subpoenas for Good Samaritan, Los Angeles Cardiologist and Dr. Cannom (1.0).	
1368.001	12/13/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.001	12/13/2018	19	A	9	110.00	2.90	319.00	ARCH
							review Dr. Smith records Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Locate original deposition exhibits (.3). Work on next 16.1 disclosure (.8). Begin review of 300 pages of Sam's medical records (1.0).	
1368.001	12/13/2018	1	A	9	400.00	2.50	1,000.00	ARCH
							(50%) Work on reply to Wendy's opposition to motion to compel production regarding Jessica Clayton (2.1). Receive and review records of Dr. Ronald Smith for any evidence of mental incapacity (.8). Review filings by counsel for Wendy (.3). Receive and thoroughly review with comments asserted therein James Green's expert witness report (1.8).	
1368.001	12/14/2018	19	A	9	110.00	3.10	341.00	ARCH
							Multiple telephone conferences with Kent Robison regarding status and assignments (.3). Continue with	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	12/14/2018	1	A	9	400.00	1.10	440.00	ARCH
							review of medical records from Dr. Smith (1.8). Research drug side effects (1.0). (50%) Receive and review Wendy's 9th Request for Production of Documents regarding documents on which Todd signed Sam's name (.3). Draft responses to 9th Request for Production of Documents (.4). Review Wendy's second set of interrogatories to Todd and prepare answers (.3). Review Wendy's RFPs to Stan and confer with Todd regarding these discovery requests (.3). Receive and review Jim Green's draft of expert report and provide answers to questions asked (.9).	
1368.001	12/17/2018	49	A	9	120.00	1.00	120.00	ARCH
							Research designation of percipient expert witness to determine what is needed under the rules, discuss the same with Kent	
1368.001	12/17/2018	19	A	9	110.00	3.40	374.00	ARCH
							Conference with Kent Robison to review assignments (.3). Assist with documents/information/exhibits for expert disclosure (2.0). Review new documents from Trust (.3). Work on 16.1 supplement (.3). Review Pierre deposition Vol. II (.5).	
1368.001	12/17/2018	1	A	9	400.00	3.20	1,280.00	ARCH
							(50%) Work on preparing expert disclosures concerning James Green and in collaboration with Don concerning recipient experts (1.2). Telephone conference collaboration with Don Lattin (1.1). Receive, review Wendy's replies to our opposition to her motion to join additional parties (.8). Receive, review Wendy's reply to Don Lattin's opposition to Wendy's petition "to redress" (.9). Telephone conference with Nik Palmer regarding subpoena duces tecum and responses available under Rule 45 (.2). Receive and review Wendy's initial expert disclosures; read carefully report of Campagna, Stolbach and Wallace (2.2).	
1368.001	12/18/2018	44	A	9	250.00	0.50	125.00	ARCH
							attend discovery conference	
1368.001	12/18/2018	19	A	9	110.00	4.00	440.00	ARCH
							Review Wendy's expert disclosures (.3). Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Review new documents from client (.8). Locate and prepare documents/information for discovery hearing (.8). Attend pre-hearing conference with Kent Robison and client (1.0).	
1368.001	12/18/2018	1	A	9	400.00	2.20	880.00	ARCH
							(50%) Office conference with Don Lattin and Todd Jaksick to prepare for discovery dispute conference (1.4). Participation in telephone discovery dispute conference with Commissioner Ayres (1.6). Prepare, file, and serve 30(b)(6) notices (1.4).	
1368.001	12/19/2018	44	A	9	250.00	3.00	750.00	ARCH
							Draft objection to request for submission (0.5); review reply in support of emergency motion to remove Todd (0.5); review opposition to MOTION FOR SUMMARY JUDGMENT re Stan (0.5); begin draft reply (1.5)	
1368.001	12/19/2018	19	A	9	110.00	3.60	396.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft trial exhibit index (.5). Attend telephone conference with Kent Robison and client (.5). Prepare second amended indemnity time line documents (1.0). Work on 16.1 disclosures (.5).	
1368.001	12/19/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Done notices of deposition preparation. Continue to review outline and summarize depositions of Stanley Jaksick and Pierre Hascheff.	
1368.001	12/20/2018	44	A	9	250.00	2.50	625.00	ARCH
							Review motion to strike (0.5); continue draft reply ISO MOTION FOR SUMMARY JUDGMENT re Stan (1.5); review SDT to Tigor Title and outline objections (0.5)	
1368.001	12/20/2018	19	A	9	110.00	3.60	396.00	ARCH
							Multiple telephone conferences/emails with Kent Robison to review assignments (.3). Review, print and organize new photographs from client (.5). Work on 16.1 disclosures (1.0). Prepare and send documents/information to Alexander (.3). Contact and email documents/information to Green (.5). Review and prepare Chrisman documents (1.0).	
1368.001	12/21/2018	44	A	9	250.00	1.00	250.00	ARCH
							research re motion to strike for untimeliness (0.5); outline opposition (0.5)	
1368.001	12/21/2018	19	A	9	110.00	2.70	297.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Work on 16.1 supplement (1.0). Update deposition/trial exhibit indexes (.8). Review and print documents/information from client (.3).	
1368.001	12/21/2018	1	A	9	400.00	2.00	800.00	ARCH
							Start working on instructions. Draft some fiduciary duty instructions.	

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Client ID 1368.001 Jaksick/Todd								
1368.001	12/24/2018	44	A	9	250.00	1.00	250.00	Review Wendy Opp MOTION FOR SUMMARY JUDGMENT re Tahoe House ARCH
1368.001	12/24/2018	44	A	9	250.00	1.00	250.00	research re statute of limitations as objective standard (0.5); review re filings need to be completed (0.5) ARCH
1368.001	12/24/2018	19	A	9	110.00	2.20	242.00	Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison, Therese Shanks and client (1.5). ARCH
1368.001	12/24/2018	1	A	9	400.00	2.70	1,080.00	(50%) Finalize, review by proof read and changes Todd's opposition to Wendy's motion to compel production from Nanette Childers (1.4). Receive and review Wendy's opposition to Todd's motion to dismiss petition for redress (.8). Receive, review Stan's opposition to Todd's motion for summary judgment (.9). Start outline and draft of reply to Stan's opposition (.6). Meeting with Therese to review and correct Todd Jaksick's reply to Wendy's opposition to our motion to strike petition for redress (.5). Complete all portions of finalized trial protocol statement (.9). Discuss proposed trial protocol statement with Don and agreed to file on December 26th (.3). ARCH
1368.001	12/26/2018	19	A	9	110.00	2.60	286.00	Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 disclosures (.8). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0). ARCH
1368.001	12/26/2018	1	A	9	400.00	1.35	540.00	(50%) Receive, review Wendy's opposition (50 pages) to Todd's motion regarding Issue Trust (2.1). Commence outline preparation for reply (.6). ARCH
1368.001	12/26/2018	1	A	9	400.00	2.60	1,040.00	(50%) Telephone conference with Don and Jessica regarding pending deposition and status of procedure regarding objection to Rule 45 subpoena served on Jessica (.5). Receive Zack's December 26, 2018 letter outlining the number of requests for production that should be responded to first for mediation purposes, regarding "mission critical requests" (2.3). Conference with Todd and Don regarding same (1.2). Continue to review initial 4 sets of requests to determine if response to these 88 are feasible (.9). Prepare demand on Family Trust to cover Jack Rabbit capitol call (.3). ARCH
1368.001	12/27/2018	19	A	9	110.00	3.00	330.00	Conference with Kent Robison to review assignments (.5). Assist with documents/information/exhibits for settlement conference statement (2.5). ARCH
1368.001	12/27/2018	1	A	9	400.00	4.60	1,840.00	Preparation of Todd's confidential mediation statement for Bob Enzenberger (2.8). Review documents provided by Todd regarding Montreux lots, Montreux value sales, history, and settlement ideas presented by Todd (.9). Receive Don's proposed motion to exclude Wallace as expert; provide comments in response thereto (.5). Prepare and distribute letter withdrawing objections to subpoena served on medical providers (.4). ARCH
1368.001	12/28/2018	19	A	9	110.00	2.00	220.00	Work on next 16.1 document disclosure (.5). Conference with Kent Robison (.5). Locate and prepare documents/information for Kent Robison (1.0). ARCH
1368.001	12/28/2018	1	A	9	400.00	1.10	440.00	(50%) Work on designation of rebuttal experts (.7). Receive, review Kevin Riley's second supplement to designation of expert witnesses (.8). Receive, review supplemental expert witness designations from Wendy concerning notices of deposition for Palmer, Childers, and McQuaid (.3). Receive and review Commissioner's recommendations for Jessica to provide certain emails and documents from server (.4). ARCH
1368.001	12/31/2018	19	A	9	110.00	1.70	187.00	Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0). ARCH
1368.001	12/31/2018	1	A	9	400.00	2.10	840.00	(50%) Complete rebuttal expert witness disclosure and filed same (.6). Review Therese's version and draft of Todd's reply to Stan's opposition to motion for summary judgment; made corrections and redraft introduction (.3). Telephone conference with Nik Palmer regarding objection to subpoena duces tecum served on Nik December 17, 2018 (.5). Prepare and made revisions to first draft of Jessica's objection to second subpoena duces tecum (.5). Work on draft of Todd's reply to Wendy's opposition to Todd's motion for summary judgment (.4). Draft Todd's discovery status report to Judge Hardy due January 4th (.7). Telephone conference with Don regarding Kevin Riley's deposition and whether to object or postpone (.3). Start draft of Todd's pretrial disclosures due to be filed January 4, ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	01/02/2019	1	A	9	400.00	4.20	1,680.00	ARCH
1368.001	01/02/2019	44	A	9	250.00	5.25	1,312.50	ARCH
1368.001	01/02/2019	19	A	9	110.00	2.60	286.00	ARCH
1368.001	01/03/2019	1	A	9	400.00	4.80	1,920.00	ARCH
1368.001	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
1368.001	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
1368.001	01/04/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.001	01/04/2019	1	A	9	400.00	4.10	1,640.00	ARCH
1368.001	01/05/2019	1	A	9	400.00	2.90	1,160.00	ARCH
1368.001	01/07/2019	44	A	9	250.00	3.50	875.00	ARCH
1368.001	01/07/2019	19	A	9	110.00	4.40	484.00	ARCH
1368.001	01/07/2019	1	A	9	400.00	2.70	1,080.00	ARCH
1368.001	01/08/2019	44	A	9	250.00	5.25	1,312.50	ARCH
1368.001	01/08/2019	19	A	9	110.00	4.10	451.00	ARCH
1368.001	01/08/2019	1	A	9	400.00	1.45	580.00	ARCH
1368.001	01/09/2019	44	A	9	250.00	5.50	1,375.00	ARCH
1368.001	01/09/2019	19	A	9	110.00	3.80	418.00	ARCH
1368.001	01/09/2019	1	A	9	400.00	1.10	440.00	ARCH

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Client ID 1368.001 Jaksick/Todd	01/10/2019	44	A	9	250.00	2.00	500.00	ARCH
1368.001	01/10/2019	19	A	9	110.00	3.80	418.00	ARCH
1368.001	01/10/2019	1	A	9	400.00	1.10	440.00	ARCH
1368.001	01/11/2019	1	A	9	400.00	3.30	1,320.00	ARCH
1368.001	01/11/2019	44	A	9	250.00	4.00	1,000.00	ARCH
1368.001	01/11/2019	19	A	9	110.00	3.90	429.00	ARCH
1368.001	01/14/2019	44	A	9	250.00	4.00	1,000.00	ARCH
1368.001	01/14/2019	19	A	9	110.00	5.10	561.00	ARCH
1368.001	01/14/2019	1	A	9	400.00	2.00	800.00	ARCH
1368.001	01/15/2019	1	A	9	400.00	3.70	1,480.00	ARCH
1368.001	01/15/2019	44	A	9	250.00	3.50	875.00	ARCH
1368.001	01/15/2019	19	A	9	110.00	5.40	594.00	ARCH
1368.001	01/16/2019	19	A	9	110.00	3.70	407.00	ARCH
1368.001	01/17/2019	44	A	9	250.00	0.50	125.00	ARCH
1368.001	01/17/2019	19	A	9	110.00	4.80	528.00	ARCH
1368.001	01/17/2019	1	A	9	400.00	2.80	1,120.00	ARCH
1368.001	01/17/2019	1	A	9	400.00	0.90	360.00	ARCH



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	01/18/2019	19	A	9	110.00	3.40	374.00	ARCH
							opposition to motion to strike (.4). Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on preparation of trial exhibit binders (1.8). Work on final 16.1 supplement (.3). Update deposition exhibit binders (.5).	
1368.001	01/18/2019	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Deposition preparation session with Jessica Clayton. Prepare discovery status report for Judge Hardy.	
1368.001	01/21/2019	1	A	9	400.00	1.10	440.00	ARCH
1368.001	01/21/2019	44	A	9	250.00	2.25	562.50	ARCH
1368.001	01/21/2019	19	A	9	110.00	1.00	110.00	ARCH
1368.001	01/22/2019	1	A	9	400.00	5.60	2,240.00	ARCH
							(50%) Met with Jessica Clayton and review documents signed by Sam that she notarized (1.5). Appear at and defend Jessica's deposition (6.5). Prepare for discovery dispute conference with Wesley Ayres (.2). Participate in discovery dispute conference with Commissioner Ayres (.9). Prepare to take deposition of Wendy's expert Wallace (2.1).	
1368.001	01/22/2019	44	A	9	250.00	1.00	250.00	ARCH
							Review order re motion to strike and trial orders (0.5); discovery conference (0.5)	
1368.001	01/22/2019	19	A	9	110.00	5.60	616.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Attend deposition preparation conference with Kent Robison and Jess (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on documents for Audio/Tech person (.5). Work on trial exhibits and exhibit index (2.5).	
1368.001	01/23/2019	1	A	9	400.00	4.80	1,920.00	ARCH
							(50%) Prepare for deposition of Bruce Wallace by reviewing report references and favorable testimony of Pierre Hascheff and Bob Legoy (2.2). Took deposition of Bruce Wallace (3.8). Participate in deposition of Bruce Wallace taken by Don Lattin (2.1). Work on motion in limine regarding Wallace testimony (.5). Continue work on jury instructions (.6). Start drafts of demonstrative evidence (.4).	
1368.001	01/23/2019	44	A	9	250.00	2.00	500.00	ARCH
							Research re jury v. court issue (1); draft MIL re exclusion of equitable evidence (1)	
1368.001	01/23/2019	19	A	9	110.00	6.00	660.00	ARCH
							Multiple conferences with Kent Robison to review assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information/exhibits for Kent Robison (1.0). Work on trial exhibits and exhibit index (3.5).	
1368.001	01/24/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.001	01/24/2019	19	A	9	110.00	5.30	583.00	ARCH
							attend deposition of Brian McQuaid Multiple conferences with Kent Robison to review status and assignments (1.0). Work on trial exhibits and exhibit index (3.5). Organize and prepare depositions for trial (.5). Prepare and send documents/information to client (.3).	
1368.001	01/24/2019	1	A	9	400.00	0.85	340.00	ARCH
							(50%) Office conference with Todd Jaksick regarding pending issues for settlement discussions (.3). Confer and discuss regarding need to respond to Wendy's RFPs as recommended by Commissioner Ayres (1.4).	
1368.001	01/25/2019	19	A	9	110.00	5.00	550.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Work on trial exhibit binders and index (3.2). Locate, prepare and send documents/information to expert Green (.5).	
1368.001	01/25/2019	1	A	9	400.00	2.30	920.00	ARCH
							(50%) Pre-deposition conference with James Green to go over documents and matters on which James would be deposed on Monday (1.6). Prepare and file discovery status report for Judge Hardy (.5). Work on objections to recommendations made by Wesley Ayres concerning production of financial statements (.3). Work on and finalize objection to subpoena duces tecum sent to me, but not served on James Green (.8). Telephone conference with Judge Hardy as relating to marking of exhibits and pre-trial status of all pending matters (1.4).	
1368.001	01/26/2019	1	A	9	400.00	3.00	1,200.00	ARCH
1368.001	01/27/2019	1	A	9	400.00	3.00	1,200.00	ARCH
1368.001	01/28/2019	19	A	9	110.00	5.60	616.00	ARCH
							(60%) Trial preparation - Deposition (Wendy) Summary (60%) Trial preparation - Stan deposition summary. Multiple conferences with Kent Robison to review status and assignments (1.0). Locate, organize and prepare trial exhibits (2.3). Index trial exhibits (1.5). Locate and prepare transcript for trial (.8).	
1368.001	01/28/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	01/28/2019	1	A	9	400.00	4.30	1,720.00	ARCH
							Edit MIL (50%) Review exhibits submitted to James Green to confer and prepare for Green's deposition (.8).	

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Client ID 1368.001 Jaksick/Todd								
							Telephone conference with Todd regarding stamp, certificate of trust, and cutting and pasting Jarad (.7). Participate in deposition of James Green (5.9). Conference with Don and Todd regarding parameters and details of settlement discussions between Todd and Stan (.9). Work on motion in limine regarding authentication of documents and ability of documents not going to jury (.3)	
1368.001	01/29/2019	19	A	9	110.00	5.50	605.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit binders (4.0).	
1368.001	01/29/2019	44	A	9	250.00	1.50	375.00	ARCH
							Review re trial MIL, statement, objections, etc. (0.25); draft additional MIL (0.5); draft objection to subpoena (0.5); draft supplement to discovery dispute report (0.25)	
1368.001	01/29/2019	1	A	9	400.00	4.70	1,880.00	ARCH
							(50%) Work on responding with documents responsive to Commissioner's recommendation with meeting with Todd and Jessica (3.2). Complete motions in limine by including references to testimony of Stolbach Wallace and Campagna (2.2). Prepare for discovery conference with Commissioner Ayres (.8). Participate in discovery dispute conference with Commissioner Ayres (1.5). Email Green regarding originals (.2). Continue work on jury instructions from statutes and pattern regarding evidentiary issues (.6). Telephone conferences with Todd, Don, and Bob Enzenberger regarding settlement issues and points to be raised to find money for settlement (.9).	
1368.001	01/30/2019	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on/assist with responses to discovery (1.0). Work on trial exhibit binders (2.8).	
1368.001	01/30/2019	44	A	9	250.00	5.50	1,375.00	ARCH
							Review Wendy's and Stan's MIL (1.5); draft response to Stan's MIL (1); draft response to Wendy's omnibus MIL (2); begin draft opp to MIL re prior bad acts (1)	
1368.001	01/30/2019	1	A	9	400.00	5.00	2,000.00	ARCH
							(50%) Work on trial statement (.5). Work on responding to Commissioner Ayres' recommendation to produce documents on specified categories in Wendy's RFPs (4.8). Work on settlement with Todd and Don (1.1). Pre-deposition conference with Jessica Clayton (.5). Attend Jessica Clayton deposition (.4). Modify Todd's responses to Wendy's and Stan's motions in limine (.6). Draft jury instructions for statute of limitations, comparative negligence, statutes into instructions, and start draft of verdict forms (2.1).	
1368.001	01/31/2019	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison to review status (.8). Work on trial exhibit binders (3.0). Work on discovery document disclosures (1.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	01/31/2019	44	A	9	250.00	5.25	1,312.50	ARCH
							Finish opp to MIL re prior bad acts (1.5); edit (0.5); edit jury instructions (0.5); research re breach of implied covenant re trust (0.25); research re non-retained expert witnesses (1); draft opposition to MIL re non-retained expert witnesses (2)	
1368.001	01/31/2019	1	A	9	400.00	6.75	2,700.00	ARCH
							(50%) Work with Don and Todd on settlement with Stan (2.1). Work on voir dire, jury selection questions (1.8). Work on and draft jury instructions from statutes from pattern instructions and from case law provided by Therese (3.2). Start rough draft of verdict forms (.8). Deposition preparation session with Todd (1.2). Work on and complete Todd's second supplementary responses to Wendy's request for production of documents pursuant to Commissioner's recommendation (3.2). Work on notice of withdraw of petition to have Stan return Bronco Billy's money (1.2).	
1368.001	02/01/2019	19	A	9	110.00	5.50	605.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information for Kent Robison (.5). Locate original depo transcripts (.5). Work on trial exhibit binders and indexes (4.0).	
1368.001	02/01/2019	44	A	9	250.00	4.20	1,050.00	ARCH
							Review re needed filings (0.5); draft jury instruction re aiding and abetting (0.25); draft supplemental MIL (0.5); edit resp re Stan MIL (0.25); finish opp MIL re non-retained experts (1.5); edit (0.5); draft withdrawal of expert (0.2); review juror questionnaire (0.5)	
1368.001	02/01/2019	1	A	9	400.00	6.45	2,580.00	ARCH
							(50%) Office conference with Don and Todd to prepare for Todd's deposition by review of documents produced	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
							in response to Discovery Commissioner's recommendations (1.2). Appear at and defend Todd at deposition (7.0). Arguments to Discovery Commissioner regarding settlement (.3). Work on jury instructions for aiding and abetting damages and wrote out verdict forms (1.8). Post deposition conference with Don and Todd regarding schedule for week of February 4th and allocations of duties, assignments and responsibilities for next week (.8). Finalize supplemental motion in limine regarding settlement (.3). Prepare and file notice to withdraw petition for Stan to return proceeds from Bronco Billy (.2). Receive and start review of jury list (.9). Distribute juror profile characteristics to co-counsel and Todd (.2). Email to Phil and Adam regarding review of jury list for persons with whom Stan has association or knowledge about (.2).	
1368.001	02/02/2019	19	A	9	110.00	2.50	275.00	ARCH
1368.001	02/02/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.001	02/02/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/03/2019	19	A	9	110.00	3.80	418.00	ARCH
1368.001	02/03/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/04/2019	19	A	9	110.00	6.00	660.00	ARCH
							Multiple conferences with Kent Robison to review status (.2). Work on trial exhibit binders and exhibits (3.5).	
1368.001	02/04/2019	44	A	9	250.00	4.25	1,062.50	ARCH
1368.001	02/04/2019	1	A	9	400.00	5.28	2,112.00	ARCH
							Finish opp mtn to continue (2); attend hearings (2.25) (60%) Pre-trial meeting with client regarding motion to continue (.6). Appear at court for marking of exhibits with negotiations concerning marking with Spencer & Johnson (1.8). Continue review of motions, oppositions, and replies in limine to prepare for arguments (1.2). Argue Wendy's motion to continue before Judge Hardy (3.0). Met with Todd to debrief after court (.4). Start review and preparation for argument on motion to exclude Stolbach (1.8).	
1368.001	02/05/2019	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (1.0). Work on documents/information/exhibits for Mark Ivey (2.5). Update working exhibits for Kent Robison (.8).	
1368.001	02/05/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	02/05/2019	1	A	9	400.00	3.75	1,500.00	ARCH
							Attend PTC Hearing (50%) Review motions and cases regarding prior bad acts motion in limine to prepare for argument (2.1). Appearance in court with Judge Hardy regarding ruling on motion to continue (1.4). Attend and participate in settlement efforts with Stan's counsel and Wendy's counsel (2.2). Start review, highlighting, and study of Wendy's marked exhibits 400 - 457 (1.8).	
1368.001	02/06/2019	19	A	9	110.00	5.00	550.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (1.0). Continue with review and revision of exhibits (1.5). Prepare documents/information for Mark Ivey (1.5).	
1368.001	02/06/2019	1	A	9	400.00	2.40	960.00	ARCH
1368.001	02/07/2019	1	A	9	400.00	4.50	1,800.00	ARCH
							(60%) Trial preparation. (70%) Jury list scrutiny analysis (2.0). Charts (2.2). Conference with Don and Todd - trial preparation (1.2). Prepare and file clarification regarding exhibits (1.0).	
1368.001	02/07/2019	19	A	9	110.00	4.80	528.00	ARCH
							Multiple conferences with Kent Robison (1.3). Locate and prepare documents/information for Kent Robison (1.0). Attend conference with Kent Robison and Latin (.5). Work on new exhibits (1.0). Meet with Mark Ivey and prepare documents/information for him (1.0).	
1368.001	02/07/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.001	02/08/2019	19	A	9	110.00	5.60	616.00	ARCH
							trial prep meeting Multiple conferences with Kent Robison to review assignments (1.3). Locate and prepare documents/information for Kent Robison (.8). Review and revise trial exhibit binders and indexes (1.0). Assist with documents/information for charts (1.0). review jury list (.5). Locate and organize depositions (1.0).	
1368.001	02/08/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.001	02/08/2019	1	A	9	400.00	4.80	1,920.00	ARCH
							Draft answers to supplement (1); trial prep (0.5) (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	

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Client ID 1368.001 Jaksick/Todd								
1368.001	02/09/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/10/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/11/2019	19	A	9	110.00	4.50	495.00 Review and respond to Kent Robison emails (.2). Print and organize charts (.8). Work on location and organization of depositions for trial (1.5). Work on new exhibits for Lattin (.5). Continue with review and revision of trial exhibit and indexes (1.5).	ARCH
1368.001	02/11/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/12/2019	19	A	9	110.00	5.10	561.00 Multiple conferences with Kent Robison to review status and assignments (1.3). Work on charts (1.0). Work on review and revision of trial exhibits (1.0). Locate and prepare documents/information for Kent Robison (.8). Work on Kent Robison trial book (1.0).	ARCH
1368.001	02/12/2019	44	A	9	250.00	3.00	750.00 Review Wendy affidavit (0.5); draft response to affidavit (1.5); edit (1)0.5; further prep (0.5)	ARCH
1368.001	02/12/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/13/2019	19	A	9	110.00	4.90	539.00 Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information for Kent Robison (.8). Attend conference with Kent Robison, Lattin, client (1.3). Prepare jury selection board (1.0). Prepare and send documents/information to Mark Ivey (.5). Work on Kent Robison trial book (.5).	ARCH
1368.001	02/13/2019	19	A	9	110.00	6.30	693.00 Multiple conferences with Kent Robison to review status (1.0). Attend and assist with jury selection (4.3). Locate and prepare documents/information for tomorrow (1.0).	ARCH
1368.001	02/13/2019	44	A	9	250.00	3.00	750.00 Hearing on MIL (2.25), meeting with client (.75)	ARCH
1368.001	02/13/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/14/2019	44	A	9	250.00	4.00	1,000.00 jury selection	ARCH
1368.001	02/14/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/15/2019	19	A	9	110.00	5.50	605.00 Multiple conferences with Kent Robison to review status (1.0). Prepare for and attend opening (4.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.001	02/15/2019	44	A	9	250.00	3.25	812.50 Trial (2.25); begin draft mtns for DV re release and damages (1.5)	ARCH
1368.001	02/15/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/16/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/17/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/18/2019	19	A	9	110.00	1.60	176.00 Prepare original depositions for court (.8). Review and revise exhibit binders (.8).	ARCH
1368.001	02/18/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/19/2019	19	A	9	110.00	5.60	616.00 Multiple conferences with Kent Robison to review assignments (.8). Telephone conference with Todd Alexander and prepare and send documents/information (.5). Attend portions of trial (1.5). Update exhibit books with new exhibit (.8). Locate and prepare documents/information for tomorrow (1.0).	ARCH
1368.001	02/19/2019	44	A	9	250.00	4.50	1,125.00 Trial	ARCH
1368.001	02/19/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/20/2019	19	A	9	110.00	5.10	561.00 Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents/information for Kent Robison (1.0). Deliver documents/information/exhibits to Kent Robison and courthouse (1.0). Revise/update/exhibit binders (1.0). Locate and prepare documents/information/exhibits for tomorrow (1.3).	ARCH
1368.001	02/20/2019	44	A	9	250.00	4.50	1,125.00 Jury trial (1); review Stan depo testimony and outline topics for KRR (3.5)	ARCH
1368.001	02/20/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/21/2019	19	A	9	110.00	5.30	583.00 Work on Kent Robison binders of Todd exhibits (1.0). Multiple conferences with Kent Robison to review status (1.0). Attend trial (2.5). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.001	02/21/2019	44	A	9	250.00	3.00	750.00 Review WEndy Depo Testimony	ARCH

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Client ID 1368.001 Jaksick/Todd								
1368.001	02/21/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/22/2019	19	A	9	110.00	5.00	550.00 Multiple conferences with Kent Robison to review status (1.0). Locate and review documents/information for Kent Robison (1.0). Attend trial (3.0).	ARCH
1368.001	02/22/2019	44	A	9	250.00	5.00	1,250.00 Trial (3); further review of Wendy depo (2)	ARCH
1368.001	02/22/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/23/2019	1	A	9	400.00	2.40	960.00 (60%) Trial preparation.	ARCH
1368.001	02/24/2019	1	A	9	400.00	3.00	1,200.00 (60%) Trial preparation.	ARCH
1368.001	02/25/2019	19	A	9	110.00	5.80	638.00 Multiple conferences with Kent Robison to review status (1.0). Prepare documents/information/exhibits for today's witnesses (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	ARCH
1368.001	02/25/2019	44	A	9	250.00	5.00	1,250.00 trial	ARCH
1368.001	02/25/2019	1	A	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	ARCH
1368.001	02/26/2019	1	P	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	678
1368.001	02/26/2019	19	P	9	110.00	5.80	638.00 Multiple conferences with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibits for Kent Robison (1.0). Attend trial (3.0). Prepare documents/information/exhibits for tomorrow (.8).	684
1368.001	02/26/2019	44	P	9	250.00	4.25	1,062.50 draft motion for directed verdict (1); attend trial (3.25)	689
1368.001	02/27/2019	1	P	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	679
1368.001	02/27/2019	19	P	9	110.00	6.40	704.00 Multiple conference with Kent Robison to review status & assignments (1.0). Locate & prepare documents/information/exhibit for Kent Robison & Lattin (1.3). Attend trial (3.3). Locate & prepare documents/information/exhibit for tomorrow (.8).	685
1368.001	02/27/2019	44	P	9	250.00	4.50	1,125.00 Attend Trial	690
1368.001	02/28/2019	1	P	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	680
1368.001	02/28/2019	19	P	9	110.00	6.00	660.00 Multiple conferences with Kent Robison to review status & assignments (1.2). Locate & prepare documents/information/exhibits for Kent Robison (1.3). Attend trial (2.5). Prepare documents/information/exhibits for tomorrow (1.0).	686
1368.001	02/28/2019	44	P	9	250.00	5.25	1,312.50 Attend trial (4.5); review jury instructions (0.75)	691
1368.001	03/01/2019	1	P	9	400.00	6.00	2,400.00 (60%) Trial preparation, witness preparation, trial conferences with client pre-trial, conferences with client post-trial.	681
1368.001	03/01/2019	19	P	9	110.00	5.30	583.00 Multiple conferences with Kent Robison to review assignments (1.5). Locate & prepare documents/information/exhibits for Kent Robison (.8). Attend trial (2.0). Work on charts, documents, information exhibits for tomorrow (1.0).	687
1368.001	03/01/2019	44	P	9	250.00	4.50	1,125.00 Attend trial (2); meet and confer re instructions (1); begin brief on jury instructions (1.5)	692
1368.001	03/02/2019	1	P	9	400.00	2.40	960.00 (60%) Trial preparation.	682
1368.001	03/02/2019	44	P	9	250.00	1.50	375.00 Draft brief on jury instructions	693
1368.001	03/03/2019	1	P	9	400.00	3.48	1,392.00 (60%) Trial preparation.	683
1368.001	03/03/2019	44	P	9	250.00	1.75	437.50 Review Wendy's supplemental instructions (0.5); edit jury instruction brief (1); draft competing instruction (0.25)	694
1368.001	03/04/2019	19	P	9	110.00	6.50	715.00 Multiple conferences with Kent Robison regarding status & assignments (1.5). Prepare documents/information/exhibits/charts for closing (1.0). Locate & prepare documents/information for Kent Robison (1.0). Attend trial (2.0). Wait for verdict (1.0).	688
1368.001	03/04/2019	44	P	9	250.00	7.50	1,875.00 Attend trial	695
1368.001	03/04/2019	1	P	9	400.00	8.10	3,240.00 (60%) Worked on diagrams for closing (.9). Worked on review of exhibits to show during closing (.8). Reviewed and analyzed Petitioners power point slides (.7). Instruction changes and work with court. (1.9) Closing arguments (5.6). Jury deliberation and appear for jury question and taking verdict. (4.4).	698
1368.001	03/06/2019	44	P	9	250.00	0.50	125.00 outline next steps	696
1368.001	03/07/2019	44	P	9	250.00	0.50	125.00 Meeting with client	697

Date: 03/11/2019

Detail Fee Transaction File List  
Robison, Sharp, Sullivan & Brust

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Total for Client ID 1368.001					Billable	951.66	233,754.00	Jaksick/Todd (445) SSJs Trust
GRAND TOTALS								
					Billable	951.66	233,754.00	

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 11**

**EXHIBIT 11**

From 8/30/18 - Present - 446

Date: 03/11/2019

Detail Fee Transaction File List  
Robison, Sharp, Sullivan & Brust

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Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	08/30/2018	1	A	9	400.00	0.95	380.00 (50%) Evaluated Connot's push back letter and started draft of response (.7). Work on deposition schedule (.3). Start draft of reply to motion to terminate and opposition to motion for sanctions (.9).	ARCH
1368.002	08/30/2018	19	A	9	110.00	3.30	363.00 Telephone conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for motion to disqualify (1.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5).	ARCH
1368.002	08/31/2018	19	A	9	110.00	1.80	198.00 Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Update documents/exhibit/indexes (.3).	ARCH
1368.002	08/31/2018	44	A	9	250.00	2.00	500.00 Outline reply (0.5); research re termination of depositions (0.5); begin draft reply (1)	ARCH
1368.002	09/04/2018	19	A	9	110.00	4.30	473.00 Locate and prepare documents/information/exhibits for 30(b)(6) depositions (.8). Multiple conferences with Kent Robison to review status (1.0). Locate and prepare additional documents/information/exhibits for Kent Robison (1.0). Print and prepare documents/information from client (.5). Begin review of new Stan documents (5K pages) (1.0).	ARCH
1368.002	09/04/2018	44	A	9	250.00	0.50	125.00 continue draft reply	ARCH
1368.002	09/04/2018	1	A	9	400.00	3.40	1,360.00 (50%) Prepare for and took deposition of Stan Jaksick as 30(b)(6) witness for Toiyabe and 30(b)(6) witness for Jaksick Family LLC. Post deposition conferences with Adam and Don regarding more efficient way to obtain 30(b)(6) information through accountant. Email confirmation. Conference with Don and Adam regarding potential initiation of settlement discussions.	ARCH
1368.002	09/05/2018	19	A	9	110.00	2.00	220.00 Update all deposition exhibit binders (.5). Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Prepare documents for production (.5).	ARCH
1368.002	09/05/2018	44	A	9	250.00	0.70	175.00 emails re depositions (0.2); finish reply ISO mtn to terminate (0.5)	ARCH
1368.002	09/05/2018	1	A	9	400.00	1.20	480.00 (50%) Work on rescheduling 30(b)(6) depositions. Telephone conference with Don Lattin regarding availability of Kevin Riley to answer 30(b)(6) questions. Email traffic to Adam and Don regarding initiation of settlement negotiations. Receive Todd's outline and incorporate outline deal points into deposition questions for Pierre Haschef.	ARCH
1368.002	09/06/2018	19	A	9	110.00	2.50	275.00 Locate and prepare documents/information/exhibits for motion to disqualify (1.0). Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0).	ARCH
1368.002	09/06/2018	44	A	9	250.00	2.00	500.00 Review depo transcripts re agitated or improper comments, length of breaks, etc. (0.5); outline opp to motion to compel (0.5); began draft opp (1)	ARCH
1368.002	09/06/2018	1	A	9	400.00	0.50	200.00 (50%) Work on objections to interrogatories served on Todd (.4). Telephone conference with Pierre Haschef's office regarding confirmation of deposition for 9/14/18 (.3). Process amended notice of deposition for Judge Haschef (.3).	ARCH
1368.002	09/06/2018	1	A	9	400.00	0.90	360.00 (50%) Request to help with response to 30(b)(6) notices on Todd. Email to Don to be directed and forwarded to Kevin, requesting documents for Todd entities similar or identical to those produced by Stan for Stan entities. Commence review of Stan's deposition testimony regarding tracing of \$400,000 Bronco Billy proceeds and \$434,000 Bronco Billy proceeds to determine whether discouragement or reimbursement is appropriate.	ARCH
1368.002	09/07/2018	19	A	9	110.00	1.50	165.00 Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Jamieson deposition (1.0). Telephone conference with expert Green (.3).	ARCH
1368.002	09/07/2018	44	A	9	250.00	1.50	375.00 Finish draft opp (0.75); edit reply to match opp (0.75)	ARCH
1368.002	09/10/2018	19	A	9	110.00	4.30	473.00 Multiple conferences with Kent Robison to review status and deposition preparation (1.2). Attend conference with Kent Robison, client, Lattin (.5). Locate and prepare documents/information/exhibits for Jamieson deposition (1.3). Print and process documents/information from client (.3). Locate and prepare documents/information for Kent Robison conference with Todd Alexander (1.0).	ARCH
1368.002	09/10/2018	1	A	9	400.00	4.00	1,600.00 (50%) Office conference with Todd Jaksick to review pertinent documents and exhibits to be used for Pierre	ARCH



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	09/11/2018	1	A	9	400.00	2.00	800.00	ARCH
							Haschef's deposition (3.2). Office conference with Todd Alexander, counsel for Pierre Haschef, to enlighten and educate Todd with respect to pleadings, allegations, accusations, and documents relevant to Pierre's involvement with Jaksick family and Todd (.8). Work on obtaining dates for mediation from Judge Gamble and Bob Eisenberg (.1)	
1368.002	09/12/2018	19	A	9	110.00	2.60	286.00	ARCH
							(50%) Office conference with Todd Jaksick to review pertinent documents and exhibits to be used for Pierre Haschef's deposition (3.2). Office conference with Todd Alexander, counsel for Pierre Haschef, to enlighten and educate Todd with respect to pleadings, allegations, accusations, and documents relevant to Pierre's involvement with Jaksick family and Todd (.8). Conference with Kent Robison to review status (.3). Update deposition exhibit binders (.3). Locate and prepare documents/information/exhibits for Pierre deposition (1.5). Locate and prepare documents/information for and attend telephone conference with Kent Robison and expert Green (.5).	
1368.002	09/13/2018	19	A	9	110.00	3.80	418.00	ARCH
							Multiple conferences with Kent Robison to review assignments and prepare for upcoming depositions (1.5). Locate and prepare additional documents/information/exhibits for Pierre deposition (1.8). Locate documents/information for expert Green (.3). Locate, prepare and send documents/information to Todd Alexander (.3).	
1368.002	09/13/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Prepare for meet and confer with Texas counsel regarding discovery issues, including request for production of documents, subpoena duces tecum, and Todd's deposition. Participate in meet and confer with counsel regarding discovery issues. Work on reply to motion to terminate and motion to challenge pro hac vice admission. Analyze water right deeds provided by Jessica.	
1368.002	09/14/2018	19	A	9	110.00	3.40	374.00	ARCH
							Locate and prepare additional documents/information/exhibits for Pierre deposition (.8). Attend multiple conferences with Kent Robison, Lattin, client regarding deposition documents/information (1.5). Update deposition exhibit binders (.3). Review new documents from client (.8).	
1368.002	09/14/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/17/2018	19	A	9	110.00	2.30	253.00	ARCH
							client meeting Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Update deposition roster and indexes (.5). Locate and prepare documents/information/exhibits for motion (.8).	
1368.002	09/17/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Work on reviewing documents provided by Kevin Riley to Adam responsive to Todd's 30(b)(6) notice requests (.3). Email Don Lattin requesting Kevin provide same to Adam for 30(b)(6) noticed for Todd (.2). Work on stipulation to extend expert disclosures and discovery cutoff by and through court approved stipulation (.3). Work on demand for indemnification from Issue Trust and Family Trust for legal fees (.4).	
1368.002	09/18/2018	19	A	9	110.00	1.50	165.00	ARCH
							Conference with Kent Robison to review status (.5). Update deposition exhibit and transcript binders (.5). Update Kent Robison working document binders (.5).	
1368.002	09/19/2018	19	A	9	110.00	0.50	55.00	ARCH
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information for Kent Robison (.3).	
1368.002	09/19/2018	44	A	9	250.00	1.80	450.00	ARCH
							Client meeting (0.8); review subpoenas to Jessica and Nannette (1)	
1368.002	09/19/2018	1	A	9	400.00	1.20	480.00	ARCH
							Prepare for meeting with Todd Jaksick to review status of production for companies and trusts. Work on conceptual components of demand letter to obtain payment from Family Trust for Todd's fees and costs. Work conceptually on petition to compel Stan to refund \$400,000 of Bronco Billy's funds and \$434,000 used to pay loans owed by Family Trust to Lakeridge. Telephone conference with Don Lattin.	
1368.002	09/20/2018	19	A	9	110.00	1.70	187.00	ARCH
							Conference with Kent Robison to review status (.2). Update deposition exhibit binders (.2). Review Pierre deposition (1.0). Prepare documents/information/exhibits for upcoming 30(b)(6) depositions (.3).	
1368.002	09/20/2018	44	A	9	250.00	2.50	625.00	ARCH
							Draft petition for reconveyance (1); draft responses to SDT for Jessica (1.5)	
1368.002	09/21/2018	1	A	9	400.00	1.15	460.00	ARCH
							(50%) Receive and review Jamison deposition summary for purposes of determining whether lawsuit	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	09/21/2018	1	A	9	400.00	0.40	160.00	ARCH
							for defamation should be processed (.4). Develop a chronology of 30(b)(6) documents produced and began reviewing documents produced by Kevin Riley to Stan's counsel responsive to 30(b)(6) depositions (.9). Continue providing outline information regarding Stan's use of \$400,000 and \$434,000 of Bronco Billy sale proceeds (.6). Draft demand letter for return of funds (.4).	
1368.002	09/24/2018	19	A	9	110.00	2.30	253.00	ARCH
							(50%) Email to and from Mark Knought regarding acceptance of service of subpoena duces tecum on Jessica and Nanette. Telephone conference with Todd Jaksick regarding documents produced for Toiyabe Investment Company. Review of documents produced for TIC with Jessica and Todd. Telephone conference with Don regarding Knought's position that Hascheff's future deposition cannot be scheduled until motion to terminate is decided and work on draft of letter responding to Knought's unreasonable position. Review & print new documents from Riley (.3). Conference with Kent Robison to review status & assignments (.5). Locate & prepare documents/information/exhibits for Indemnity Agreement/Fee Demand (1.2). Prepare & send documents/information to client (.3).	
1368.002	09/24/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Office conference with Todd regarding corrections to deposition (.8). Review all of Todd's suggested changes (.5). Start notice of corrections format (.3).	
1368.002	09/24/2018	1	A	9	400.00	2.00	800.00	ARCH
							Continue research concerning Stan's testimony as to location and whereabouts of Bronco Billy proceeds by review of transcript (.8). Work on petition to have Stan's discouragement (.8). Made revisions to Therese's final draft to finalize for filing (.4).	
1368.002	09/25/2018	44	A	9	250.00	2.60	650.00	ARCH
1368.002	09/25/2018	19	A	9	110.00	2.30	253.00	ARCH
							Begin Nanette draft objections (1); client meeting (1.6) Locate & prepare documents/information/testimony for fee letter (1.0). Attend conference with Kent Robison, Therese Shanks, client (1.0). Locate & prepare documents/information for Kent Robison (.3).	
1368.002	09/26/2018	19	A	9	110.00	1.10	121.00	ARCH
							Conference with Kent Robison to review assignments (.3). Locate and prepare documents/information for Kent Robison (.8).	
1368.002	09/26/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/26/2018	1	A	9	400.00	0.90	360.00	ARCH
							Edit petition for reconveyance (50%) Meeting with Don and Todd to review need for petition for instructions. Work on letter requesting fees be paid by Family and/or Issue Trust.	
1368.002	09/27/2018	19	A	9	110.00	1.80	198.00	ARCH
							Review deposition changes/corrections from client (.3). Update all document binders and indexes (1.0). Begin organization of documents/information/exhibits not used for depositions (.5).	
1368.002	09/27/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	09/27/2018	44	A	9	250.00	0.50	125.00	ARCH
							Incorporate client edits into petition, and email to client Review emergency motion to continue the trial and extend discovery	
1368.002	09/27/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Continue work on petition for reconveyance of proceeds diverted by Stan consisting of Bronco Billy's \$400,000 (.8). Telephone conference with Don regarding Kevin's position on 434 being a payment on a loan owed by Family Trust to Lakeridge (.4).	
1368.002	09/28/2018	19	A	9	110.00	1.50	165.00	ARCH
							Review and organize documents/information prepped for but not marked for depositions (potential trial exhibit) (1.0). Update documents and deposition exhibit binders (.5).	
1368.002	10/01/2018	1	A	9	400.00	0.60	240.00	ARCH
							(50%) Revise objections to subpoena duces tecum (.3). Work on reviewing Judge Hascheff's deposition for testimony supporting Todd's interpretation of indemnification agreement (.2). Start draft of demand that Family Trust indemnify and/or pay Todd's legal fee and costs (.7).	
1368.002	10/01/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Update deposition and document binders and indexes (.8). Locate and prepare documents/information for Kent Robison (.5). Continue with review and organize of potential trial exhibits (1.0).	
1368.002	10/01/2018	44	A	9	250.00	0.30	75.00	ARCH
1368.002	10/02/2018	19	A	9	110.00	2.00	220.00	ARCH
							Finish draft Nano objections Conference with Kent Robison to review status (.5). Review Todd's corrections to all deposition transcripts (1.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	10/02/2018	44	A	9	250.00	1.00	250.00	ARCH
1368.002	10/02/2018	44	A	9	250.00	2.00	500.00	ARCH
							Finish editing petition for reconveyance Research re diligence in conducting discovery for continuances (0.5); draft opposition to motion to	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	10/02/2018	1	A	9	400.00	0.60	240.00	ARCH
							continue trial (1.3); edit (0.2) (50%) Continue review with Todd and Jim of deposition testimony to prepare notice of corrections for all four versions (.8). Continue drafting demand for payment of fees by looking at all time charged and narratives reviewed (.4).	
1368.002	10/02/2018	1	A	9	400.00	0.50	200.00	ARCH
							(50%) Receive comments from Don Lattin regarding petition for reconveyance of funds diverted by Stanley of Bronco Billy's proceeds (.5). Inter-office conference with Therese to incorporate changes to reinstate 434 based upon Kevin Riley's expected testimony (.5).	
1368.002	10/03/2018	1	A	9	400.00	1.40	560.00	ARCH
							(50%) Continue to review and scrutiny of testimony from Pierre Hascheff concerning Sam Jaksick's intent that Todd be indemnified from Family Trust for attorney's fees and all claims against him (.8). Work on discovery issues being expressed by Todd Alexander, Mark Connot and Adam Hosmer-Henner concerning continue deposition for Judge Hascheff (.6). Work on more detailed responses and production of documents for subpoena duces tecum to Nanette and Jessica (.7). Work on including insertions concerning \$434,000 dollar misappropriation by Stan into Todd's petition for refund (.7).	
1368.002	10/03/2018	19	A	9	110.00	2.10	231.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft Notice of Corrections to depositions for Todd (1.0).	
1368.002	10/04/2018	1	A	9	400.00	0.80	320.00	ARCH
							Continue review and revisions of Todd's petition to have Bronco Billy's money returned to Family Trust.	
1368.002	10/04/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status (.5). Work on draft deposition corrections notices for Todd (1.0). Update document indexes (.5). Locate and send documents/information for client (.3).	
1368.002	10/05/2018	19	A	9	110.00	2.40	264.00	ARCH
							Conference with Kent Robison to review status (.3). Review and revise deposition notice corrections (.8). Update deposition roster and indexes (.3).	
1368.002	10/08/2018	19	A	9	110.00	0.80	88.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	10/08/2018	1	A	9	400.00	1.80	720.00	ARCH
							(50%) Office conference with Todd Jaksick and Don Lattin regarding discovery issues, expert designation, and request from Wendy's lawyers to continue dates and trial. Work on opposition to emergency motion to extend discovery. Continue to review with Todd regarding corrections to depositions and clarifications to non-sensical answers.	
1368.002	10/09/2018	1	A	9	400.00	1.85	740.00	ARCH
							(50%) Work on Supplemental Objections to Nanette & Jessica's SDTs (1.2). Work on Memo to Todd Alexander re: Pierre's continued deposition (1.1). Work with Todd to assemble Hascheff documents for inspection (.6). Communicate to counsel availability of Hascheff's documents available for inspection (.8).	
1368.002	10/10/2018	19	A	9	110.00	2.10	231.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Prepare additional information for Notice of Deposition Corrections (.3). Locate, prepare and send documents/information to Kent Robison (.5). Begin preparation for documents reviewed by Hosmer for production (1.0).	
1368.002	10/11/2018	19	A	9	110.00	1.80	198.00	ARCH
							Telephone conference with Kent Robison to review status (.3). Review Hascheff documents and prepare for duplication/production (1.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	10/11/2018	44	A	9	250.00	0.50	125.00	ARCH
							review motion to compel	
1368.002	10/12/2018	1	A	21			0.00	ARCH
							Write off prior finance charges	
1368.002	10/12/2018	19	A	9	110.00	1.80	198.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on deposition notice corrections with Kent Robison (1.0).	
1368.002	10/12/2018	1	A	9	400.00	2.50	1,000.00	ARCH
							(50%) Office conference with Nanette to review notary book (.8). Made exhibits from pages of Nanette's notary book (.4). Confer with Todd regarding decisions to pay Ag Credit (.4). Telephone conference with Don and Todd and office conference regarding demand on Phil Kreitlin to authorize payment to Ag Credit and for Stan to produce accountings for sales of Montreaux lots in light of Family Trust interest in proceeds therefrom (.8). Prepare indemnification payment for fees demand letter by review of indemnification agreement provisions (.5). Stan's testimony (.4). Wendy's testimony regarding indemnification (.4). Draft Todd's declaration (.4).	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	10/15/2018	19	A	9	110.00	1.40	154.00	ARCH
							Review Hascheff testimony to include in demand (.5). Revise letter to MCL citing above as support for Trust and Issue Trust to pay legal fees charged to Todd by RSSB (.4).	
1368.002	10/16/2018	1	A	9	400.00	1.70	680.00	ARCH
							Work on documents/information to supplemental 16.1 disclosure (.3). Review and revise deposition corrections (.3). Revise document index detailed descriptions (.8).	
1368.002	10/16/2018	19	A	9	110.00	3.10	341.00	ARCH
							(50%) Office conference with Todd regarding sanction order, discuss all pending discovery issues, telephone conference with Don Lattin, review documents requested from Pierre's file.	
1368.002	10/16/2018	44	A	9	250.00	1.00	250.00	ARCH
							Conference with Kent Robison to review assignments (.3). Review/organize boxes of documents from client for upcoming inspection (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on detailed document indexes (1.0).	
1368.002	10/17/2018	19	A	9	110.00	2.60	286.00	ARCH
							Review order (0.2); research re potential reconsideration basis (0.2); begin outline to opposition to motion to compel (0.8)	
1368.002	10/18/2018	1	A	9	400.00	1.55	620.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Work on documents to be produced (organize and locate) (1.0). Continue with review and revision of detailed indexes (1.0). Locate, prepare and send documents/information to Kent Robison (.3).	
1368.002	10/19/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Office conference with Todd to review methods by which responses could be made to subpoena duces tecum. Review in detail subpoenas and topics with Todd. Continue review of the 526 RFPs to see if any manageable strategy or procedure could be implemented to draft a response. Review notary book and modify objection to subpoena duces tecum. Work on preparing Todd for additional topics that will be addressed and covered in continued deposition.	
1368.002	10/22/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Work on scheduling Pierre Hascheff's deposition. Participate with Don and Todd in preparing for pending discovery fight and upcoming meeting with Commissioner Ayres.	
1368.002	10/22/2018	19	A	9	110.00	1.80	198.00	ARCH
							(50%) Start draft of motion for protective order on all outstanding discovery issues. Research Rule 37 regarding burdens to obtain protective order. Start itemizing individual discovery requests made by Wendy's counsel. Continue to review methodology by which Jessica's emails could be identified and possibly produced.	
1368.002	10/23/2018	19	A	9	110.00	2.50	275.00	ARCH
							Review emails from Kent Robison regarding assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Begin review of Hascheff documents (6K pages) (.8). Continue with detailed descriptions in document indexes (.5).	
1368.002	10/23/2018	44	A	9	250.00	3.00	750.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information/exhibits for protective order (1.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	10/23/2018	1	A	9	400.00	2.20	880.00	ARCH
							draft opposition to motion to compel re claims on estate administration (1); draft opposition re mental capacity requests (1); begin draft opposition re financial requests (1)	
1368.002	10/24/2018	19	A	9	110.00	1.90	209.00	ARCH
							(50%) Work on opposition to motion to compel and cross-motion for protective order by analyzing the sheer number of requests made by Wendy in RFPs, SDTs, and similar requests of Nanette, Jessica, Pierre and Bob Legoy (1.4). Draft overview and prepare chart for inclusion, motion for protective order (.5). Review allegations and accusations in Wendy's amended counter-petition to compare with relevance of specified requests (.8). Work on determining how many emails are in Jessica's "system" that would have to be reviewed in order to be responsive to the subpoena duces tecum (1.7).	
1368.002	10/24/2018	44	A	9	250.00	1.00	250.00	ARCH
							Update deposition roster and indexes (.3). Continue with review of 6K pages of Hascheff documents (.8). Continue with revision of detailed document indexes (.8).	
1368.002	10/24/2018	1	A	9	400.00	1.70	680.00	ARCH
							finish draft opp re financial requests (50%) Telephone conference with Don Lattin (.3). Review disclosure forms produced by Don to allow	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
							Kevin Riley to testify concerning Duck Lake Flat, LLC, White Pine, LLC, Home Camp, LLC without tax returns (.3). Telephone conference with Todd regarding disclosure forms (.3). Office conference with Todd to review Duck Lake, LLC documents and financials included in 30(b)(6) production (.6). Work with Todd to prepare for second round of deposition with review of material recovered by Kevin Spencer and forecast of additional topics to be covered in next session (.8). Receive and review and discuss with client Judge Hardy's order addressing motion to extend discovery, expert deadlines, and trial (.3). Commence work on status conference statement for Todd regarding abuse of discovery tactics to be presented at November 16, 2018 hearing (.4). Work on and complete Todd's response to Wendy's fifth request for production of documents (.4).	
1368.002	10/25/2018	44	A	9	250.00	6.00	1,500.00	ARCH
							Draft opp re unrelated entities (2); draft opp re other unrelated requests (3); review 6, 7, and 8 document requests (1);	
1368.002	10/25/2018	19	A	9	110.00	4.00	440.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Prepare documents/information for Rile deposition (.5). RReview 4 days of Todd deposition testimony for information for Kent Robison (3.0).	
1368.002	10/25/2018	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Continue draft of opposition to motion to compel and counter-motion for active order, including numerical analysis of 1,819 requests served on Todd and Todd Associates (Jessica, Bob Legoy, and PRN Kevin). Continue work on status conference statement to be submitted on behalf of Todd individually for both cases. Continue to review documents Kevin produced to Todd responsive to 30(b)(6) topics according to and formal agreement with Adam.	
1368.002	10/26/2018	44	A	9	250.00	1.25	312.50	ARCH
							Draft opp/motion re sanctions (0.5); edit opp/cntrmtln (0.75)	
1368.002	10/29/2018	1	A	9	400.00	5.10	2,040.00	ARCH
							(50%) Prepare for Kevin Riley deposition by review of accountings and documents provided from 30(b)(6) request (1.2). Office conference with Todd and Don to prepare for Kevin's testimony (1.6). Attend deposition of Kevin Riley (6.9). Post deposition debrief with client and Don regarding accounting issues raised by Adam in examination of Kevin Riley (.5).	
1368.002	10/29/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Locate and copy 30(b)(6) documents/usb for production to Adam (.5). Update document indexes (.5). Continue with review of Hascheff documents (.5).	
1368.002	10/30/2018	1	A	9	400.00	4.90	1,960.00	ARCH
							(50%) Prepare for and attend deposition of accountant Kevin Riley (4.2). Confer with client to prepare for client's deposition in light of Riley testimony (1.1). Attend and defend deposition of Todd Jaksick (3.7). Post deposition review of testimony and exhibits with Todd and debriefing after deposition testimony (.8).	
1368.002	10/30/2018	19	A	9	110.00	2.30	253.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information/exhibits for depositions (Riley and Todd) (.8). Continue with review of Hascheff documents (1.0).	
1368.002	10/31/2018	1	A	9	400.00	4.10	1,640.00	ARCH
							(50%) Prepare Todd for further deposition testimony (.8). Attend and defend Todd's deposition taken by Kevin Spencer (6.3). Post deposition debrief with client (1.1).	
1368.002	10/31/2018	44	A	9	250.00	0.50	125.00	ARCH
							Incorporate client edits and final edits to opp mtn/countermtln	
1368.002	10/31/2018	19	A	9	110.00	2.10	231.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information/exhibits for today's depositions (.8). Update exhibits on system (.5). Work on revisions to detailed document indexes (.5).	
1368.002	11/01/2018	1	A	9	400.00	0.80	320.00	ARCH
							(50%) Work on providing responses to Stan's request for admissions and responses to interrogatories (1.6)	
1368.002	11/01/2018	19	A	9	110.00		0.00	ARCH
							Conference with Kent Robison to review status (.5). Locate and prepare documents/information for Kent Robison (.5). Review latest deposition exhibit, organize and index (1.0). Work on detailed document index (.8).	
1368.002	11/02/2018	19	A	9	110.00	1.80	198.00	ARCH
							Conference with Kent Robison to review status (.3). Organize and index deposition exhibits (original, working clean) (.8). Meet with court reporter regarding drop box for exhibits (.2). Continue with detailed document index (.5).	
1368.002	11/05/2018	1	A	9	400.00	0.70	280.00	ARCH
							(50%) Work on preparing answers/responses to	

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Client ID 1368.002 Jaksick/Todd								
1368.002	11/05/2018	19	A	9	110.00	2.10	231.00 Stanley's request for admissions (.3). Work on answers to interrogatories (.4). Submit both to Todd and Don for review (.1). Collaborate with Jim on responding to Stanley's two sets of request for production of documents (.6). Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for Kent Robison meeting (.5). Continue with detailed document index (.8).	ARCH
1368.002	11/06/2018	44	A	9	250.00	1.00	250.00 Draft discovery responses (0.5); research re objections re admissions in discovery requests (0.5)	ARCH
1368.002	11/06/2018	19	A	9	110.00	3.40	374.00 Conference with Kent Robison to review status and assignment (.3). Assist with document information to respond to Stan's discovery requests (2.3). Locate and prepare documents/information for Kent Robison (.5). Prepare documents/information for telephone conference with expert Green (.3).	ARCH
1368.002	11/06/2018	1	A	9	400.00	1.30	520.00 Draft responses to request for admissions for Family Trust with Todd (.7). Prepare memo for Todd explaining reasons for each denial and admission (.6).	ARCH
1368.002	11/07/2018	19	A	9	110.00	2.50	275.00 Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Review and respond to client emails (.3). Begin review of Todd deposition Vol. 5 (.8). Work on next 16.1 supplement (.8).	ARCH
1368.002	11/08/2018	19	A	9	110.00	2.40	264.00 Telephone conference with Kent Robison to review status and assignments (.3). Work on responses to Stan's requests for production of documents (1.8). Prepare and send documents/information to Kent Robison (.3).	ARCH
1368.002	11/09/2018	19	A	9	110.00	2.40	264.00 Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft discovery responses (.8). Locate and prepare documents for Judge Hascheff (.3). Update document indexes (.5).	ARCH
1368.002	11/09/2018	1	A	9	400.00	1.05	420.00 (50%) Office conference at Don Lattin's to confer with Don and Todd regarding issues raised by Wendy's counsel, ongoing discovery, experts analysis, and strategies on how to apply for or get fees paid.	ARCH
1368.002	11/12/2018	1	A	9	400.00	0.75	300.00 (50%) Prepare declaration in support of Todd's demand for fees (.4). Work on first draft of Todd's status conference statement outlining for Court's consideration magnitude of discovery disputes and magnitude of discovery requests (1.1).	ARCH
1368.002	11/13/2018	19	A	9	110.00	3.40	374.00 Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 production (.5). Prepare documents/information for Kent Robison (.5). Prepare for and attend conference with Kent Robison and client to work on discovery responses (1.8). Prepare and send documents/information to client (.3).	ARCH
1368.002	11/13/2018	1	A	9	400.00	0.70	280.00 Office conference with Todd to work on answers to interrogatories.	ARCH
1368.002	11/14/2018	19	A	9	110.00	4.00	440.00 Conference with Kent Robison to review draft discovery responses (1.0). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison and client to assist with documents/information for request for production responses (2.5).	ARCH
1368.002	11/14/2018	1	A	9	400.00	1.70	680.00 (50%) Work on supplement to opposition to motion to continue by including overview of discovery request showing chart of number of request for production, number of topics on subpoena duces tecum, number of interrogatories, request for admissions, compared to specific issues raised in counter-petitions (1.6). Review Todd's roles as Trustee of Issue, Trustee of Family, and as individual to restrict and limit issues pertaining to Todd as individual to finalize argument with curtailing discovery is better solution than continuing trial (1.8).	ARCH
1368.002	11/15/2018	1	A	9	400.00	1.40	560.00 (50%) Prepared for hearing reading briefs, etc. (1.2.) Motion to compel reviewed (.6). Prepare outline and index of discovery demands (.8). D. See emails and stuff to review for hearing (.2)	ARCH
1368.002	11/15/2018	19	A	9	110.00	1.50	165.00 Conference with Kent Robison to review status (.2). Begin draft request for production of documents to Stan (.5). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.002	11/16/2018	44	A	9	250.00	1.50	375.00 attend hearing	ARCH
1368.002	11/16/2018	19	A	9	110.00	1.80	198.00 Conference with Kent Robison to review status and	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	11/16/2018	1	A	9	400.00	2.40	960.00	ARCH
							assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Locate and prepare documents/information/exhibits for Hascheff deposition (.5). Begin work on draft trial exhibit index (.5).	
1368.002	11/17/2018	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	11/19/2018	19	A	9	110.00	1.70	187.00	ARCH
							(50%) Pre-hearing conference with Don, Therese, Carolyn, and client regarding Court's status hearing. Present at Court's status conference. Discussions among counsel on how to proceed with Court's ruling as amended deadlines. Commence collaboration on who to use "two choices" for mediator - agree on Enzenberger and Gamble. Start work on motion to strike Wendy's new petition for exceeding 30 pages, filing without Court permission, and presenting redundant arguments to Court to influence Court at status conference.	
1368.002	11/20/2018	19	A	9	110.00	2.00	220.00	ARCH
							attend Pierre Hascheff deposition	
1368.002	11/21/2018	19	A	9	110.00	2.60	286.00	ARCH
							Telephone conference with Kent Robison to review status and assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Contact reporter regarding copy of hearing transcript (.3). Work on draft trial exhibit index (.8).	
1368.002	11/27/2018	19	A	9	110.00	4.20	462.00	ARCH
							Telephone conference with Kent Robison to review assignments (.2). Review hearing transcript for information/deadlines (.3). Process deposition transcripts (.5). Work on trial exhibit index (1.0).	
1368.002	11/28/2018	19	A	9	110.00	2.30	253.00	ARCH
							Telephone conference with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on draft trial exhibit index (.5). Process new deposition transcripts (.5). Prepare summary of claims for Kent Robison (.8).	
1368.002	11/29/2018	44	A	9	250.00	4.50	1,125.00	ARCH
							Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (1.0). Prepare for and attend conference with Kent Robison and client to prepare discovery responses (1.8). Work on draft trial exhibit index (.3).	
1368.002	11/29/2018	19	A	9	110.00	2.80	308.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Work on draft trial exhibit list/index (1.0). Update all document indexes (.5).	
1368.002	11/29/2018	1	A	9	400.00	2.40	960.00	ARCH
							Work on trial protocol (0.5); draft MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by statute of limitations (3.25); begin draft argument portion of MOTION FOR SUMMARY JUDGMENT re Stan's claims barred by release (0.75)	
1368.002	11/30/2018	1	A	9	400.00	1.35	540.00	ARCH
							to review status (.3). Attend conference with Kent Robison, Therese Shanks, Hannah Fuetsch regarding trial protocol preparation (1.0). Locate and prepare documents/information/exhibits for Therese Shanks (.5).	
1368.002	12/03/2018	44	A	9	250.00	1.40	350.00	ARCH
							(50%) Office conference to prepare motions for summary judgment and related filings with Todd, Jessica and Don. Work on analysis of discovery requests to determine on Incline TSS documents and emails produced versus those that might not have been produced.	
1368.002	12/03/2018	19	A	9	110.00	1.00	110.00	ARCH
							(50%) Continue work on answers to interrogatories propounded by Stan (.4). Revise and redraft responses to request for admissions (.3). Telephone conference with Don Lattin regarding sufficiency and adequacy of answers to RFA's and interrogatories (.4). Work on trial protocol statement (.3). Work on opposition to motion to compel regarding Jessica subpoena duces tecum (.6). Revise and draft introduction to motion to strike Wendy's petition (.4). Work on changes to opposition to motion to join indispensable party and finalize (.3).	
1368.002	12/03/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							Conference with Kent Robison to review status (.3). Work on trial exhibit index (.5). Locate and prepare documents/information for Kent Robison (.5).	
							Review trial protocol (0.2); finish MOTION FOR SUMMARY JUDGMENT re Stan (0.7); edit (0.5)	
							Conference with Kent Robison to review status (.2). Locate and prepare documents/information/exhibits for Kent Robison (.8).	
							(50%) Office conference with Todd and Jessica to have them assist in Todd's opposition to Wendy's motion to compel production (1.8). Work with Deb	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
							Harris on formulating methodology to ascertain number of emails in Jessica's system for AOL and Gmail concerning specified topics (1.1). Work with Deb on declaration to show Commissioner and Judge the fact that Jessica needs to review and possibly produce 46,000 emails (.6). Telephone conference with Jim Green regarding issues raised in handwriting samples (.7). Complete Todd's answers to 1st Set of Interrogatories regarding Family Trust (.6). Met and confer with Todd to finish Todd's answers to 1st Set of Interrogatories regarding Issue Trust (1.2)	
1368.002	12/04/2018	44	A	9	250.00	2.00	500.00	ARCH
1368.002	12/04/2018	1	A	9	400.00	2.10	840.00	ARCH
							Draft MOTION FOR SUMMARY JUDGMENT re Wendy's claims	
1368.002	12/05/2018	19	A	9	110.00	2.40	264.00	ARCH
							(50%) Continue draft of motion for summary judgment against Stanley (1.2). Assemble accumulated exhibits and testimony for draft of MSJ against Stan (1.4). Work on finalizing motion for summary judgment on Wendy's claims (.8). Work on assembling exhibits to motion from deposition exhibits and deposition testimony (.8).	
1368.002	12/05/2018	1	A	9	400.00	3.55	1,420.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.3). Prepare for and attend telephone conference with Kent Robison and expert Green (1.0). Locate and prepare documents/information for Green (.3). Attend conference with Kent Robison and client (.3).	
1368.002	12/06/2018	1	A	9	400.00	2.75	1,100.00	ARCH
							(50%) Complete final draft with attached exhibits of MSJ against Wendy (1.9). Finish final draft together with final review of exhibits and testimony of Todd's MSJ motion against Stan (2.2). Telephone conference with Jim Green; review each and every known to give Jim basis for reasons why known are in fact known signatures of Sam and/or Wendy; discuss matters to be included in Jim's expert witness report (2.1). Telephone conference with Mike Ivey regarding IT services for trial (.5). Review, finalize, proof read and change minor portions of Todd's opposition to Wendy's motion to join indispensable parties (.4).	
1368.002	12/06/2018	19	A	9	110.00	2.60	286.00	ARCH
							(50%) Continue development of trial protocol (.4). Work on 1st draft of discovery conference statement (.8). Work on and complete opposition to 40 party joinder motion (.6). Office conference with Todd regarding declarations for opposition (.5). Work on Jury Instructions (.9). Letters to expert regarding refinement of assignment (.8). Letter to MCL regarding fees (.5). Office conference with Jessica regarding deposition notice and details regarding Todd's involvement in various companies (.6). Motion in limine list prepared (.4).	
1368.002	12/07/2018	44	A	9	250.00	0.50	125.00	ARCH
1368.002	12/07/2018	19	A	9	110.00	1.30	143.00	ARCH
							Conference with Kent Robison to review status (.3). Deliver courtesy copies of report to court (.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	12/07/2018	1	A	9	400.00	0.95	380.00	ARCH
							(50%) Review status of various discovery issues (.8). Draft Todd's (Trustee and Individually) discovery status report, revised, finalized and filed (1.1).	
1368.002	12/10/2018	19	A	9	110.00	3.10	341.00	ARCH
							Telephone conference with Kent Robison to review status and assignments (.3). Work on 16.1 supplement (1.0). Locate, prepare and send documents/information to Kent Robison (.3). Locate and print Secretary of State information on all entities identified in our motion (1.5).	
1368.002	12/11/2018	1	A	9	400.00	3.00	1,200.00	ARCH
							(50%) Office conference with Don and Todd to review pending motions and discovery including motion to compel regarding Jessica Clayton, Wendy's motion for leave to join indispensable parties, motion to strike Wendy's petition to redress Todd's MSJ against Wendy and Stan, Wendy's motion to compel regarding Childers and Legoy (.9). Review trial protocol statement with Todd (.3). Work on confirming	



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Client ID 1368.002 Jaksick/Todd								
1368.002	12/11/2018	19	A	9	110.00	1.90	209.00	ARCH
							settlement conference with Bob Enzenberger and reserving Sunshine Litigation offices (.3). Participate in discovery dispute conference with Commissioner Ayres (1.1). Debrief with Don and Todd (.2). Work on Jackrabbit Capital call (.2).	
1368.002	12/11/2018	19	A	9	110.00	1.90	209.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	
1368.002	12/12/2018	19	A	9	110.00	2.00	220.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison and attend conference with Kent Robison, Lattin and client (.8). Continue with work on 16.1 supplement (.8).	
1368.002	12/12/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Draft Todd's second discovery dispute report based on participation in December 11th discovery dispute conference with Discovery Commissioner (1.2). Review law on out of state subpoena duces tecum and analyze Wendy's records subpoenas for Good Samaritan, Los Angeles Cardiologist and Dr. Cannom (1.0).	
1368.002	12/13/2018	44	A	9	250.00	0.50	125.00	ARCH
							Meeting with clients (1); research re time for final action order (1); edit memo to client (1)	
1368.002	12/13/2018	19	A	9	110.00	2.90	319.00	ARCH
							Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Locate original deposition exhibits (.3). Work on next 16.1 disclosure (.8). Begin review of 300 pages of Sam's medical records (1.0).	
1368.002	12/13/2018	1	A	9	400.00	2.50	1,000.00	ARCH
							(50%) Work on reply to Wendy's opposition to motion to compel production regarding Jessica Clayton (2.1). Receive and review records of Dr. Ronald Smith for any evidence of mental incapacity (.8). Review filings by counsel for Wendy (.3). Receive and thoroughly review with comments asserted therein James Green's expert witness report (1.8).	
1368.002	12/14/2018	19	A	9	110.00	3.10	341.00	ARCH
							Multiple telephone conferences with Kent Robison regarding status and assignments (.3). Continue with review of medical records from Dr. Smith (1.8). Research drug side effects (1.0).	
1368.002	12/14/2018	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Receive and review Wendy's 9th Request for Production of Documents regarding documents on which Todd signed Sam's name (.3). Draft responses to 9th Request for Production of Documents (.4). Review Wendy's second set of interrogatories to Todd and prepare answers (.3). Review Wendy's RFPs to Stan and confer with Todd regarding these discovery requests (.3). Receive and review Jim Green's draft of expert report and provide answers to questions asked (.9).	
1368.002	12/17/2018	19	A	9	110.00	3.40	374.00	ARCH
							Conference with Kent Robison to review assignments (.3). Assist with documents/information/exhibits for expert disclosure (2.0). Review new documents from Trust (.3). Work on 16.1 supplement (.3). Review Pierre deposition Vol. II (.5).	
1368.002	12/17/2018	1	A	9	400.00	3.20	1,280.00	ARCH
							(50%) Work on preparing expert disclosures concerning James Green and in collaboration with Don concerning recipient experts (1.2). Telephone conference collaboration with Don Lattin (1.1). Receive, review Wendy's replies to our opposition to her motion to join additional parties (.8). Receive, review Wendy's reply to Don Lattin's opposition to Wendy's petition "to redress" (.9). Telephone conference with Nik Palmer regarding subpoena duces tecum and responses available under Rule 45 (.2). Receive and review Wendy's initial expert disclosures; read carefully report of Campagna, Stolbach and Wallace (2.2).	
1368.002	12/18/2018	19	A	9	110.00	4.00	440.00	ARCH
							Review Wendy's expert disclosures (.3). Conference with Kent Robison to review status (.3). Locate and prepare documents/information for Kent Robison (.8). Review new documents from client (.8). Locate and prepare documents/information for discovery hearing (.8). Attend pre-hearing conference with Kent Robison and client (1.0).	

Client	Trans. Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd	12/18/2018	1	A	9	400.00	2.20	880.00 (50%) Office conference with Don Lattin and Todd Jaksick to prepare for discovery dispute conference (1.4). Participation in telephone discovery dispute conference with Commissioner Ayres (1.6). Prepare, file, and serve 30(b)(6) notices (1.4).	ARCH
1368.002	12/19/2018	44	A	9	250.00	3.00	750.00 Draft objection to request for submission (0.5); review reply in support of emergency motion to remove Todd (0.5); review opposition to MOTION FOR SUMMARY JUDGMENT re Stan (0.5); begin draft reply (1.5)	ARCH
1368.002	12/19/2018	19	A	9	110.00	3.60	396.00 Conference with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.8). Work on draft trial exhibit index (.5). Attend telephone conference with Kent Robison and client (.5). Prepare second amended indemnity time line documents (1.0). Work on 16.1 disclosures (.5).	ARCH
1368.002	12/19/2018	1	A	9	400.00	1.40	560.00 (50%) Done notices of deposition preparation. Continue to review outline and summarize depositions of Stanley Jaksick and Pierre Hascheff.	ARCH
1368.002	12/20/2018	44	A	9	250.00	2.50	625.00 Review motion to strike (0.5); continue draft reply ISO MOTION FOR SUMMARY JUDGMENT re Stan (1.5); review SDT to Tigor Title and outline objections (0.5)	ARCH
1368.002	12/20/2018	19	A	9	110.00	3.60	396.00 Multiple telephone conferences/emails with Kent Robison to review assignments (.3). Review, print and organize new photographs from client (.5). Work on 16.1 disclosures (1.0). Prepare and send documents/information to Alexander (.3). Contact and email documents/information to Green (.5). RReview and prepare Chrisman documents (1.0).	ARCH
1368.002	12/21/2018	44	A	9	250.00	1.00	250.00 research re motion to strike for untimeliness (0.5); outline opposition (0.5)	ARCH
1368.002	12/21/2018	19	A	9	110.00	2.70	297.00 Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.3). Work on 16.1 supplement (1.0). Update deposition/trial exhibit indexes (.8). Review and print documents/information from client (.3).	ARCH
1368.002	12/24/2018	19	A	9	110.00	2.20	242.00 Conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison, Therese Shanks and client (1.5).	ARCH
1368.002	12/24/2018	1	A	9	400.00	2.70	1,080.00 (50%) Finalize, review by proof read and changes Todd's opposition to Wendy's motion to compel production from Nanette Childers (1.4). Receive and review Wendy's opposition to Todd's motion to dismiss petition for redress (.8). Receive, review Stan's opposition to Todd's motion for summary judgment (.9). Start outline and draft of reply to Stan's opposition (.6). Meeting with Therese to review and correct Todd Jaksick's reply to Wendy's opposition to our motion to strike petition for redress (.5). Complete all portions of finalized trial protocol statement (.9). Discuss proposed trial protocol statement with Don and agreed to file on December 26th (.3).	ARCH
1368.002	12/26/2018	19	A	9	110.00	2.60	286.00 Conference with Kent Robison to review status and assignments (.3). Work on next 16.1 disclosures (.8). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit index (1.0).	ARCH
1368.002	12/26/2018	1	A	9	400.00	1.35	540.00 (50%) Receive, review Wendy's opposition (50 pages) to Todd's motion regarding Issue Trust (2.1). Commence outline preparation for reply (.6).	ARCH
1368.002	12/26/2018	1	A	9	400.00	2.60	1,040.00 (50%) Telephone conference with Don and Jessica regarding pending deposition and status of procedure regarding objection to Rule 45 subpoena served on Jessica (.5). Receive Zack's December 26, 2018 letter outlining the number of requests for production that should be responded to first for mediation purposes, regarding "mission critical requests" (2.3). Conference with Todd and Don regarding same (1.2). Continue to review initial 4 sets of requests to determine if response to these 88 are feasible (.9). Prepare demand on Family Trust to cover Jack Rabbit capitol call (.3).	ARCH
1368.002	12/27/2018	19	A	9	110.00	3.00	330.00 Conference with Kent Robison to review assignments (.5). Assist with documents/information/exhibits for settlement conference statement (2.5).	ARCH
1368.002	12/28/2018	19	A	9	110.00	2.00	220.00 Work on next 16.1 document disclosure (.5). Conference with Kent Robison (.5). Locate and prepare documents/information for Kent Robison (1.0).	ARCH
1368.002	12/28/2018	1	A	9	400.00	1.10	440.00 (50%) Work on designation of rebuttal experts (.7). Receive, review Kevin Riley's second supplement to	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	12/31/2018	19	A	9	110.00	1.70	187.00	ARCH
1368.002	12/31/2018	1	A	9	400.00	2.10	840.00	ARCH
1368.002	01/02/2019	1	A	9	400.00	4.20	1,680.00	ARCH
1368.002	01/02/2019	44	A	9	250.00	5.25	1,312.50	ARCH
1368.002	01/02/2019	19	A	9	110.00	2.60	286.00	ARCH
1368.002	01/03/2019	1	A	9	400.00	4.80	1,920.00	ARCH
1368.002	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
1368.002	01/03/2019	19	A	9	110.00	3.00	330.00	ARCH
1368.002	01/04/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.002	01/04/2019	1	A	9	400.00	4.10	1,640.00	ARCH
1368.002	01/05/2019	1	A	9	400.00	2.90	1,160.00	ARCH
1368.002	01/07/2019	44	A	9	250.00	3.50	875.00	ARCH
1368.002	01/07/2019	19	A	9	110.00	4.40	484.00	ARCH
1368.002	01/07/2019	1	A	9	400.00	2.70	1,080.00	ARCH
1368.002	01/08/2019	44	A	9	250.00	5.25	1,312.50	ARCH
1368.002	01/08/2019	19	A	9	110.00	4.10	451.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	01/08/2019	1	A	9	400.00	1.45	580.00 (1.8). (50%) Office conference with Mark Ivey to set up IT for display of exhibits and deposition testimony to court and jury (1.4). Prepare for discovery conference with Commissioner Ayres (.3). Participate in discovery conference with Commissioner Ayres (1.2).	ARCH
1368.002	01/09/2019	44	A	9	250.00	5.50	1,375.00 Call with client and co-counsel (0.25); research re trusts being deposed (0.5); outline motion (0.5); pull deposition excerpts (0.5); draft motion (3); edit (0.5); draft affidavits (0.25)	ARCH
1368.002	01/09/2019	19	A	9	110.00	3.80	418.00 Telephone conference with Kent Robison to review assignments (.2). Locate and prepare documents/information for Kent Robison (.8). Attend status telephone conference with Kent Robison, Therese Shanks, Lattin (.8). Locate and prepare documents/information/exhibits for Therese Shanks (1.0). Work on trial exhibits and binders (1.0).	ARCH
1368.002	01/09/2019	1	A	9	400.00	1.10	440.00 (50%) Conference with Don Lattin, Todd Jaksick regarding allocation and division of assignments for upcoming deposition and discovery issues. Letters to counsel regarding upcoming deposition of experts. Work with Mark Connot to move deposition dates for various experts pursuant to stipulation. Work on jury instructions with Claudia.	ARCH
1368.002	01/10/2019	19	A	9	110.00	3.80	418.00 Multiple conferences with Kent Robison to review status and assignments (.3). Locate and prepare documents/information for Kent Robison (.5). Attend deposition prep conference with Kent Robison and Childers and Clayton (1.0). Work on next 16.1 disclosure (1.0). Work on trial exhibits (1.0).	ARCH
1368.002	01/10/2019	1	A	9	400.00	1.10	440.00 (50%) Deposition preparation with Nanette Childers (.5). Work with Jessica on obtaining additional documents concerning exchange between Sam's office and Pierre's office in December 2012 (.4). Research notary laws regarding Nanette's notarization (.3). Work on discovery status report for Judge Hardy and complete same (1.0).	ARCH
1368.002	01/11/2019	1	A	9	400.00	3.30	1,320.00 (50%) Continue to draft jury instructions (.2). Research implications of whether restatement third applies to jury instructions (.2). Research specific provisions of restatement cited by Wallace and in Wendy's petition (.4). Work on drafting motion in limine regarding Wendy's experts (1.2). Continue to work on deposition summary of Wendy (3.1). Outline for trial statement (1.5).	ARCH
1368.002	01/11/2019	44	A	9	250.00	4.00	1,000.00 Jury instructions (3); review potential motions in limine and bases for trial statement (1)	ARCH
1368.002	01/11/2019	19	A	9	110.00	3.90	429.00 Conference with Kent Robison to review assignments (.3). Work on trial exhibit binders (1.3). Locate and prepare documents/information for Kent Robison (.8). Work on next 16.1 supplement (.5). Reivew/prepare Jessica documents (700 pages) (1.0).	ARCH
1368.002	01/14/2019	44	A	9	250.00	4.00	1,000.00 Review Wendy Opp (0.5); research re Wendy authority (0.5); draft reply (2); begin draft MIL (1)	ARCH
1368.002	01/14/2019	19	A	9	110.00	5.10	561.00 Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information/exhibits for upcoming expert depositions (2.5). Download documents/information for Mark Juey (.5). Review new documents from Wendy (.8). Deliver and pickup deposition exhibit binders (.5).	ARCH
1368.002	01/14/2019	1	A	9	400.00	2.00	800.00 (50%) Office conference with Nanette Childers to prepare for deposition (.8). Appearance at and defend Nanette's deposition (3.2).	ARCH
1368.002	01/15/2019	1	A	9	400.00	3.70	1,480.00 (50%) Deposition preparation for Campagna. Deposition of expert Campagna. Conference with Don and Todd. Interrogatories. Telephone conference with Jess. Motions in limine.	ARCH
1368.002	01/15/2019	44	A	9	250.00	3.50	875.00 Research re expert testimony on intent, credibility and contract interpretation (0.5); research re exclusion of evidence re discovery disputes (0.5); draft MIL re exclude Stolbach, discovery dispute, pejorative terms, begin re Campagna, Wallace (2.5)	ARCH
1368.002	01/15/2019	19	A	9	110.00	5.40	594.00 Multiple conferences with Kent Robison for deposition prep and status update (.5). Locate and prepare documents/information/exhibits for expert deposition (2.5). Work on trial exhibits (.3). Locate and prepare documents/information for Kent Robison (.8). Work on JC 16.1 supplement (.3). Locate, prepare documents and attend discovery hearing (1.0).	ARCH
1368.002	01/16/2019	19	A	9	110.00	3.70	407.00 Conference with Kent Robison to review status (.2).	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	01/17/2019	19	A	9	110.00	4.80	528.00	ARCH
							Update deposition exhibit binders (.5). Locate and prepare documents/information/exhibits for upcoming depositions (1.5). Review latest Wendy disclosure (.5). Locate and prepare documents/information for Kent Robison (1.0).	
1368.002	01/17/2019	1	A	9	400.00	2.80	1,120.00	ARCH
							Conference with Kent Robison to review status and deposition exhibits (.5). Locate and prepare additional documents/information/exhibits for deposition (1.0). Update deposition exhibit binders (.3). Attend conference with Kent Robison, Lattin and client (1.0). Work on trial exhibit (1.0). Review Tigor and Bank of America documents (1.0).	
1368.002	01/17/2019	1	A	9	400.00	0.90	360.00	ARCH
							(50%) Prepare for Stolbach deposition by reviewing all aspects of expert witness report (.4). Review via statutes regarding Todd's duty and obligation to follow testators "intent" (.3). Took deposition of Gary Stolbach (4.9).	
1368.002	01/18/2019	19	A	9	110.00	3.40	374.00	ARCH
							(50%) Office conference with Jessica Clayton to review all documents that she notarized in preparation for her deposition (1.4). Receive, review Stan's reply to Todd's opposition to motion to strike (.4).	
1368.002	01/18/2019	1	A	9	400.00	1.10	440.00	ARCH
							Multiple telephone conferences with Kent Robison to review assignments (.3). Locate, prepare and send documents/information to Kent Robison (.5). Work on preparation of trial exhibit binders (1.8). Work on final 18.1 supplement (.3). Update deposition exhibit binders (.5).	
1368.002	01/21/2019	1	A	9	400.00	1.10	440.00	ARCH
							(50%) Deposition preparation session with Jessica Clayton. Prepare discovery status report for Judge Hardy.	
1368.002	01/21/2019	44	A	9	250.00	2.25	562.50	ARCH
							(50%) Worked with Jessica to prepare for deposition. attend deposition of Bob LeGoy	
1368.002	01/21/2019	19	A	9	110.00	1.00	110.00	ARCH
							Work on trial exhibits (1.0).	
1368.002	01/22/2019	1	A	9	400.00	5.60	2,240.00	ARCH
							(50%) Met with Jessica Clayton and review documents signed by Sam that she notarized (1.5). Appear at and defend Jessica's deposition (6.5). Prepare for discovery dispute conference with Wesley Ayres (.2). Participate in discovery dispute conference with Commissioner Ayres (.9). Prepare to take deposition of Wendy's expert Wallace (2.1).	
1368.002	01/22/2019	19	A	9	110.00	5.60	616.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Attend deposition preparation conference with Kent Robison and Jess (.8). Locate and prepare documents/information for Kent Robison (1.0). Work on documents for Audio/Tech person (.5). Work on trial exhibits and exhibit index (2.5).	
1368.002	01/23/2019	1	A	9	400.00	4.80	1,920.00	ARCH
							(50%) Prepare for deposition of Bruce Wallace by reviewing report references and favorable testimony of Pierre Hascheff and Bob Legoy (2.2). Took deposition of Bruce Wallace (3.8). Participate in deposition of Bruce Wallace taken by Don Lattin (2.1). Work on motion in limine regarding Wallace testimony (.5). Continue work on jury instructions (.6). Start drafts of demonstrative evidence (.4).	
1368.002	01/23/2019	19	A	9	110.00	6.00	660.00	ARCH
							Multiple conferences with Kent Robison to review assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Locate and prepare documents/information/exhibits for Kent Robison (1.0). Work on trial exhibits and exhibit index (3.5).	
1368.002	01/24/2019	19	A	9	110.00	5.30	583.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.0). Work on trial exhibits and exhibit index (3.5). Organize and prepare depositions for trial (.5). Prepare and send documents/information to client (.3).	
1368.002	01/24/2019	1	A	9	400.00	0.85	340.00	ARCH
							(50%) Office conference with Todd Jaksick regarding pending issues for settlement discussions (.3). Confer and discuss regarding need to respond to Wendy's RFPs as recommended by Commissioner Ayres (1.4).	
1368.002	01/25/2019	19	A	9	110.00	5.00	550.00	ARCH
							Conference with Kent Robison to review status and assignments (.5). Locate and prepare documents/information for Kent Robison (.8). Work on trial exhibit binders and index (3.2). Locate, prepare and send documents/information to expert Green (.5).	
1368.002	01/25/2019	1	A	9	400.00	2.30	920.00	ARCH
							(50%) Pre-deposition conference with James Green to go over documents and matters on which James would be deposed on Monday (1.6). Prepare and file discovery status report for Judge Hardy (.5). Work on objections to recommendations made by Wesley Ayres	

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Client ID 1368.002 Jaksick/Todd								
							concerning production of financial statements (.3). Work on and finalize objection to subpoena duces tecum sent to me, but not served on James Green (.8). Telephone conference with Judge Hardy as relating to marking of exhibits and pre-trial status of all pending matters (1.4).	
1368.002	01/26/2019	1	A	9	400.00	2.00	800.00 (40%) Trial preparation - deposition summary Wendy.	ARCH
1368.002	01/27/2019	1	A	9	400.00	2.00	800.00 (40%) Trial preparation - deposition summary Stan.	ARCH
1368.002	01/28/2019	19	A	9	110.00	5.60	616.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate, organize and prepare trial exhibits (2.3). Index trial exhibits (1.5). Locate and prepare transcript for trial (.8).	ARCH
1368.002	01/28/2019	44	A	9	250.00	1.00	250.00 Edit MIL	ARCH
1368.002	01/28/2019	1	A	9	400.00	4.30	1,720.00 (50%) Review exhibits submitted to James Green to confer and prepare for Green's deposition (.8). Telephone conference with Todd regarding stamp, certificate of trust, and cutting and pasting Jarad (.7). Participate in deposition of James Green (5.9). Conference with Don and Todd regarding parameters and details of settlement discussions between Todd and Stan (.9). Work on motion in limine regarding authentication of documents and ability of documents not going to jury (.3)	ARCH
1368.002	01/29/2019	19	A	9	110.00	5.50	605.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on trial exhibit binders (4.0).	ARCH
1368.002	01/29/2019	44	A	9	250.00	1.50	375.00 Review re trial MIL, statement, objections, etc. (0.25); draft additional MIL (0.5); draft objection to subpoena (0.5); draft supplement to discovery dispute report (0.25)	ARCH
1368.002	01/29/2019	1	A	9	400.00	4.70	1,880.00 (50%) Work on responding with documents responsive to Commissioner's recommendation with meeting with Todd and Jessica (3.2). Complete motions in limine by including references to testimony of Stolbach Wallace and Campagna (2.2). Prepare for discovery conference with Commissioner Ayres (.8). Participate in discovery dispute conference with Commissioner Ayres (1.5). Email Green regarding originals (.2). Continue work on jury instructions from statutes and pattern regarding evidentiary issues (.6). Telephone conferences with Todd, Don, and Bob Enzenberger regarding settlement issues and points to be raised to find money for settlement (.9).	ARCH
1368.002	01/30/2019	19	A	9	110.00	5.30	583.00 Multiple conferences with Kent Robison to review status and assignments (1.0). Locate and prepare documents/information for Kent Robison (.5). Work on/assist with responses to discovery (1.0). Work on trial exhibit binders (2.8).	ARCH
1368.002	01/30/2019	44	A	9	250.00	5.50	1,375.00 Review Wendy's and Stan's MIL (1.5); draft response to Stan's MIL (1); draft response to Wendy's omnibus MIL (2); begin draft opp to MIL re prior bad acts (1)	ARCH
1368.002	01/30/2019	1	A	9	400.00	5.00	2,000.00 (50%) Work on trial statement (.5). Work on responding to Commissioner Ayres' recommendation to produce documents on specified categories in Wendy's RFPs (4.8). Work on settlement with Todd and Don (1.1). Pre-deposition conference with Jessica Clayton (.5). Attend Jessica Clayton deposition (.4). Modify Todd's responses to Wendy's and Stan's motions in limine (.6). Draft jury instructions for statute of limitations, comparative negligence, statutes into instructions, and start draft of verdict forms (2.1).	ARCH
1368.002	01/31/2019	19	A	9	110.00	5.30	583.00 Multiple conferences with Kent Robison to review status (.8). Work on trial exhibit binders (3.0). Work on discovery document disclosures (1.0). Locate and prepare documents/information for Kent Robison (.5).	ARCH
1368.002	01/31/2019	44	A	9	250.00	5.25	1,312.50 opp to MIL re prior bad acts (1.5); edit (0.5); edit jury instructions (0.5); research re breach of implied covenant re trust (0.25); research re non-retained expert witnesses (1); draft opposition to MIL re non-retained expert witnesses (2)	ARCH
1368.002	01/31/2019	1	A	9	400.00	6.75	2,700.00 (50%) Work with Don and Todd on settlement with Stan (2.1). Work on voir dire, jury selection questions (1.8). Work on and draft jury instructions from statutes from pattern instructions and from case law provided by Therese (3.2). Start rough draft of verdict forms (.8). Deposition preparation session with Todd (1.2). Work on and complete Todd's second supplementary responses to Wendy's request for production of documents pursuant to Commissioner's	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	02/01/2019	19	A	9	110.00	5.50	605.00	ARCH
1368.002	02/01/2019	44	A	9	250.00	4.20	1,050.00	ARCH
1368.002	02/01/2019	1	A	9	400.00	6.45	2,580.00	ARCH
1368.002	02/02/2019	19	A	9	110.00	2.50	275.00	ARCH
1368.002	02/02/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.002	02/02/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/03/2019	19	A	9	110.00	3.80	418.00	ARCH
1368.002	02/03/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/04/2019	19	A	9	110.00	6.00	660.00	ARCH
1368.002	02/04/2019	44	A	9	250.00	4.25	1,062.50	ARCH
1368.002	02/04/2019	1	A	9	400.00	3.52	1,408.00	ARCH
1368.002	02/05/2019	19	A	9	110.00	5.30	583.00	ARCH
1368.002	02/05/2019	44	A	9	250.00	1.00	250.00	ARCH
1368.002	02/05/2019	1	A	9	400.00	3.75	1,500.00	ARCH
1368.002	02/06/2019	19	A	9	110.00	5.00	550.00	ARCH
1368.002	02/06/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/07/2019	1	A	9	400.00	1.90	760.00	ARCH
1368.002	02/07/2019	19	A	9	110.00	4.80	528.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	02/08/2019	19	A	9	110.00	5.60	616.00	ARCH
							and prepare documents/information for Kent Robison (1.0). Attend conference with Kent Robison and Lattin (.5). Work on new exhibits (1.0). Meet with Mark Ivey and prepare documents/information for him (1.0).	
1368.002	02/08/2019	44	A	9	250.00	1.50	375.00	ARCH
1368.002	02/08/2019	1	A	9	400.00	3.20	1,280.00	ARCH
							Multiple conferences with Kent Robison to review assignments (1.3). Locate and prepare documents/information for Kent Robison (.8). Review and revise trial exhibit binders and indexes (1.0). Assist with documents/information for charts (1.0). review jury list (.5). Locate and organize depositions (1.0).	
1368.002	02/09/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/10/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/11/2019	19	A	9	110.00	4.50	495.00	ARCH
							Draft answers to supplement (1); trial prep (0.5) (40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
							(40%) Trial preparation.	
							(40%) Trial preparation.	
							Review and respond to Kent Robison emails (.2). Print and organize charts (.8). Work on location and organization of depositions for trial (1.5). Work on new exhibits for Lattin (.5). Continue with review and revision of trial exhibit and indexes (1.5).	
1368.002	02/11/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/12/2019	19	A	9	110.00	5.10	561.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (1.3). Work on charts (1.0). Work on review and revision of trial exhibits (1.0). Locate and prepare documents/information for Kent Robison (.8). Work on Kent Robison trial book (1.0).	
1368.002	02/12/2019	44	A	9	250.00	3.00	750.00	ARCH
							Review Wendy affidavit (0.5); draft response to affidavit (1.5); edit (1)0.5; further prep (0.5)	
1368.002	02/12/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/13/2019	19	A	9	110.00	4.90	539.00	ARCH
							Multiple conferences with Kent Robison to review status and assignments (.8). Locate and prepare documents/information for Kent Robison (.8). Attend conference with Kent Robison, Lattin, client (1.3). Prepare jury selection board (1.0). Prepare and send documents/information to Mark Ivey (.5). Work on Kent Robison trial book (.5).	
1368.002	02/13/2019	19	A	9	110.00	6.30	693.00	ARCH
							Multiple conferences with Kent Robison to review status (1.0). Attend and assist with jury selection (4.3). Locate and prepare documents/information for tomorrow (1.0).	
1368.002	02/13/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.002	02/13/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							Hearing on MIL (2.25), meeting with client (.75) (40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/14/2019	44	A	9	250.00	4.00	1,000.00	ARCH
1368.002	02/14/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							Jury selection (40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/15/2019	19	A	9	110.00	5.50	605.00	ARCH
							Multiple conferences with Kent Robison to review status (1.0). Prepare for and attend opening (4.0). Locate and prepare documents/information for Kent Robison (.5).	
1368.002	02/15/2019	44	A	9	250.00	3.25	812.50	ARCH
							Trial (2.25); begin draft mtns for DV re release and damages (1.5)	
1368.002	02/15/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/16/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/17/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/18/2019	19	A	9	110.00	1.60	176.00	ARCH
							Prepare original depositions for court (.8). Review and revise exhibit binders (.8).	
1368.002	02/18/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/19/2019	19	A	9	110.00	5.60	616.00	ARCH
							(40%) Trial preparation.	
							Multiple conferences with Kent Robison to review assignments (.8). Telephone conference with Todd Alexander and prepare and send documents/information (.5). Attend portions of trial (1.5). Update exhibit books with new exhibit (.8). Locate and prepare documents/information for tomorrow (1.0).	
1368.002	02/19/2019	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	02/19/2019	1	A	9	400.00	4.00	1,600.00	ARCH
							(40%) Trial preparation, witness preparation, trial, conferences with client pre-trial, conferences with client post-trial.	
1368.002	02/20/2019	19	A	9	110.00	5.10	561.00	ARCH
							Multiple conferences with Kent Robison to review status (.8). Locate and prepare documents/information for Kent Robison (1.0). Deliver	



Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	02/20/2019	44	A	9	250.00	4.50	1,125.00	ARCH
1368.002	02/20/2019	1	A	9	400.00	4.00	1,600.00	ARCH
1368.002	02/21/2019	19	A	9	110.00	5.30	583.00	ARCH
1368.002	02/21/2019	44	A	9	250.00	3.00	750.00	ARCH
1368.002	02/21/2019	1	A	9	400.00	4.00	1,600.00	ARCH
1368.002	02/22/2019	19	A	9	110.00	5.00	550.00	ARCH
1368.002	02/22/2019	44	A	9	250.00	5.00	1,250.00	ARCH
1368.002	02/22/2019	1	A	9	400.00	4.00	1,600.00	ARCH
1368.002	02/23/2019	1	A	9	400.00	1.60	640.00	ARCH
1368.002	02/24/2019	1	A	9	400.00	2.00	800.00	ARCH
1368.002	02/25/2019	19	A	9	110.00	5.80	638.00	ARCH
1368.002	02/25/2019	44	A	9	250.00	5.00	1,250.00	ARCH
1368.002	02/25/2019	1	A	9	400.00	4.00	1,600.00	ARCH
1368.002	02/26/2019	1	P	9	400.00	4.00	1,600.00	622
1368.002	02/26/2019	19	P	9	110.00	5.80	638.00	628
1368.002	02/26/2019	44	P	9	250.00	4.25	1,062.50	633
1368.002	02/27/2019	1	P	9	400.00	4.00	1,600.00	623
1368.002	02/27/2019	19	P	9	110.00	6.40	704.00	629
1368.002	02/27/2019	44	P	9	250.00	4.50	1,125.00	634
1368.002	02/28/2019	1	P	9	400.00	4.00	1,600.00	624
1368.002	02/28/2019	19	P	9	110.00	6.00	660.00	630
1368.002	02/28/2019	44	P	9	250.00	5.25	1,312.50	635
1368.002	03/01/2019	1	P	9	400.00	4.00	1,600.00	625
1368.002	03/01/2019	19	P	9	110.00	5.30	583.00	631
1368.002	03/01/2019	44	P	9	250.00	4.50	1,125.00	636
1368.002	03/02/2019	1	P	9	400.00	1.60	640.00	626
1368.002	03/02/2019	44	P	9	250.00	1.50	375.00	637
1368.002	03/03/2019	1	P	9	400.00	2.32	928.00	627
1368.002	03/03/2019	44	P	9	250.00	1.75	437.50	638
1368.002	03/04/2019	19	P	9	110.00	6.50	715.00	632

Date: 03/11/2019

**Detail Fee Transaction File List**  
Robison, Sharp, Sullivan & Brust

Page: 19

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
<b>Client ID 1368.002 Jaksick/Todd</b>								
1368.002	03/04/2019	44	P	9	250.00	7.50	1,875.00	639
1368.002	03/04/2019	1	P	9	400.00	5.40	2,160.00	642
							Locate & prepare documents/information for Kent Robison (1.0). Attend trial (2.0). Wait for verdict (1.0). Attend trial (40%) Worked on diagrams for closing. (.9). Worked on review of exhibits to show during closing (.8). Reviewed and analyzed Petitioners power point slides.(.7). Instruction changes and work with court. (1.9) Closing arguments (5.6). Jury deliberation and appear for jury question and taking verdict. (4.4).	
1368.002	03/06/2019	44	P	9	250.00	0.50	125.00	640
1368.002	03/07/2019	44	P	9	250.00	0.50	125.00	641
							outline next steps meeting with client	
<b>Total for Client ID 1368.002</b>					Billable	864.04	202,577.00	Jaksick/Todd (446) Jaksick Family Trust
<b>GRAND TOTALS</b>								
					Billable	864.04	202,577.00	

FILED  
Electronically  
PR17-00445  
2019-03-13 06:45:01 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7165263 : yvilorla

**EXHIBIT 12**

**EXHIBIT 12**

## **KENT R. ROBISON**

### **EDUCATION**

University of Nevada, Reno - 1969 (B.A.)

University of San Francisco, School of Law - 1972 (J.D.)

### **OCCUPATIONAL BACKGROUND**

1971 - Carson City District Attorney's Office

1972-1975 - Washoe County Public Defender's Office

1975-1979 - Johnson, Belaustegui & Robison

1979-1981 - Johnson, Belaustegui, Robison and Adams

1981-1988 - Robison, Lyle, Belaustegui & Robb

1988 to 1999 - Robison, Belaustegui, Robb & Sharp

1999 to present - Robison, Belaustegui, Sharp & Low

### **COURTS ADMITTED TO PRACTICE**

Nevada Supreme Court - 1972

Nevada Federal District Court - 1973

Ninth Circuit Court of Appeals - 1976

Court of Claims - 1973

United States Tax Court - 1982

United States Supreme Court - 1977

Northern District of California Federal Court

Eastern District of California Federal Court

Southern District of California Federal Court

District of Arizona Federal Court

District of Kansas Federal Court

District of Hawaii Federal Court

District of Western Washington Federal Court

District of New Mexico Federal Court

### **PROFESSIONAL AFFILIATIONS & ACTIVITIES**

Nevada Supreme Court Trial Judge Seminar - Judge's Relationship With Lawyers -  
2009 & 2012

Nevada Supreme Court - Bench Bar Committee - 2009-2011

Member - Nevada Supreme Court's Committee on Court Costs and Speedy Trials

Member - State Commission on Sentencing Felony Offenders

Member - Executive Committee to Establish Appellate Court

Member - Commission to Implement Cameras in the Courtroom

Member - Committee on Rules of Civil Procedure

Member - Ad Hoc Committee for Improved Technology in Nevada Federal Court Rooms

American Trial Lawyer's Association - ATLA Sustaining Member - ATLA Stalwart

Member - Professional Liability Section of ATLA

Roscoe Pound Foundation

National Association of Criminal Defense Lawyers

Nevada Trial Lawyer's Association - Past President - 1979

Member of NTLA Board of Governors 1973-1983

NTLA Pillar of Justice

American Board of Trial Advocates - President, Reno Chapter, 1991-1993

Nevada State Board of Bar Governors - 1980 to 1990

Northern Nevada Legal - Medical Screening Panel (1981-1985)

Washoe County Juvenile Master Pro Tem (1975-1977)

Diplomat - National Board of Trial Advocacy - Civil  
Diplomat - National Board of Trial Advocacy - Criminal  
American Bar Association (1972-present)  
Member - ABA Litigation Section  
Nevada State Bar Association (1972-present)  
Washoe County Bar Association  
American Board of Criminal Lawyers  
Nevada State Bar Ethics Committee - Ex-officio  
Nevada State Bar Jury Instruction Committee - Ex-officio  
American Inns of Court (Charter Member and as Master)  
Honorable Bruce R. Thompson Chapter  
American College of Barristers  
Member - Board of Trustees - Justice League of Nevada (2012-2013)  
(Formerly Nevada Law Foundation)

### **RECOGNITION**

The Best Lawyers in America - 1993-2013 (21 years) (Personal Injury/Commercial Litigation)  
Named Top Attorneys - "Super Lawyers" of the Mountain States - 2007-2017 - Top 5%  
Named by the American Law Journal to the Nation's Top 100 Commercial Litigation Lawyers  
Chambers USA Leading Litigation and Business Lawyers - Tier I Nevada Trial Lawyers  
Outstanding Lawyers of America = 2003  
American College of Barristers - Senior Counsel  
College of Master Advocates  
Martindale's "Bar Registry of Preeminent Lawyers" in five categories  
(Business Litigation, Personal Injury (Plaintiff and Defense), Domestic and Criminal)  
Who's Who in the Law  
Who's Who in the West  
Who's Who in America  
Certified Criminal Trial Advocate - National Board of Trial Advocacy - 1980  
Certified Civil Trial Advocate - National Board of Trial Advocacy -1980  
National College of Trial Advocacy - Faculty Advanced Course  
Category I (Highest Rating) National Directory of Criminal Lawyers  
"AV" Martindale-Hubbell "Preeminent" Rating - Highest Rating in Ability and Ethics  
Master (Emeritus) and Charter Member of The American Inns of Court - Reno Chapter  
Litigation Counsel of America - Trial Lawyer Honorary Society  
Fellow - Litigation Counsel of America  
Corporate Counsel Top Lawyers -2010  
Top Commercial Litigation Lawyers - 2006 - 2011  
National Trial Lawyers - Top 100 Trial Lawyers - 2011 - 2013  
Robison, Belaustegui, Sharp & Low - U.S. News - Best Law Firms - Reno Tier 1 - 2011  
Commercial Litigation, Corporate Law and Personal Injury  
America's Top 100 Attorneys - Lifetime Achievement - 2016  
Fellow - American College of Trial Attorneys - Top 1% Trial Lawyers

### **AUTHORSHIP**

Cameras in the Courtroom (Advocate - Vol. IV., No. 2, February 1980)  
Nevada's Comparative Negligence (Advocate - Vol. I., No. 9, January 1977)  
Psychology and Eye Witness Identification (Advocate - Vol. II., No. 2, November, 1977)  
Juries & Verdicts - Nevada Handbook on Civil Procedure

The Gaming Industry's Other Gamble - Tort Litigation  
 The Law of Jury Selection (NBI 1996)  
 Special Tools for Selecting the Right Jury (NBI 1996)  
 Inadequate Security Issues in the Intentional Tort Arena  
 (Professional Educational Systems 1996)  
 Inadequate Security Cases Involving Violent Crimes - From a Defense View  
 (ATLA January 1997)  
 Direct Examination and Demonstrative Evidence "Tools For Proving" (Consumer Attorneys of  
 San Diego 1998)  
 "Initial Considerations Regarding Use of Expert Witnesses" (NBI 1998)  
 Comparative Cross-Examination and Strategies For Impeachment (NBI 1998)  
 The Defense Attorney's "Dirty Dozen" (Defense Considerations in Negligent Security Cases)  
 (ATLA January 1999)  
 Damages: The Art of Asking for Money (NTLA Annual Seminar)  
 Jury Trials - Nevada Civil Practice Manual (2000-2013)  
 Trial Lawyers' Relationship with the Trial Judge in Civil Actions  
 (2008 & 2012 Nev. S. Ct. Trial College)  
 Complex Themes and Opening Statements (NBI 12/14/16)

### **DEFENSE EXPERIENCE**

Since 1991 extensive defense work has been provided for the Mandalay Resort Group, General  
 Star Management Company, ALAS, Allianz Insurance Company and individuals in the areas of  
 negligent security, toxic mold, unnecessary force, professional liability, defective construction,  
 intentional torts and negligence.

### **LECTURES**

Western Nevada Community College - Annual "Criminal Defense Trial Tactics"  
 Reno Police Academy - 1976 - "Motions to Suppress Evidence"  
 California Legal Secretaries Association - 1979 - "Capital Punishment"  
 Nevada Trial Lawyers Annual Convention - 1977 - "Closing Arguments in Criminal Trials"  
 University of Nevada, Reno, Department of Criminal Science - 1978 - "Defense Strategy"  
 Reno Business College - "Organization of Criminal Files" - 1980  
 Nevada Society of Safety Engineers  
 ATLA's 1984 Annual Convention, Seattle, Washington, Belli Seminar - "Lay  
 Use of the Psychological Stress Evaluator as a Civil Cause of Action"  
 Washoe County Bar Association - May 14, 1985 - "Preparation of Personal Injury Cases"  
 Legal Aspects of Mandatory Drug Testing of Collegiate Athletes - 1986  
 Psychology and Jury Selection - 1987  
 New Rules of Civil Procedure - 1987  
 Psychology of Jury Selection - Nevada Trial Lawyers Annual Convention - 1988  
 Nevada Law on Bad Faith Insurance Practices - Nevada Trial Lawyers - 1993  
 Gaming Industry and Tort Litigation - 1994  
 Premises Liability: Inadequate or Negligent Security - 1996  
 Strategies for Selecting Juries - 1996  
 Premises Liability - Defense View - ATLA Mega Seminar - 1997  
 Expert Witness - Selection, Preparation and Presentation - NBI 1998  
 Direct Examination and Demonstrative Evidence - 1998  
 Premises Liability Cases - From a Defense View - ATLA - Phoenix - Feb. 1999  
 Damages - "How to Ask for Money" - NTLA Annual Convention - Oct. 1999

Masters in Trial - Closing Argument (ABOTA-Masters in Trial) - Dec. 1999  
Damages: How to Minimize; How to Maximize - Inns of Court - Jan. 2000  
Masters in Trial - 2002 - 2005 - 2006  
Inns of Court Presentations: Jury Selection; Opening Statements; Child Witnesses;  
Eye Witness Testimony; Expert Witness Examinations  
Presenter for Difficult Voir Dire Issues (2009 Nev. S. Ct. Trial College)  
UNR Medical School Presenter - "Interaction Between Legal and Medical Professions" - 2/2011  
"Role of the Judge" (new judge orientation) (2012 Nev. S. Ct. Trial College)  
Presenter - Nevada State Bar Convention - "Direct Examination" - July 2013  
Advanced Civil Litigation Skills of Nevada Introducing Complex Themes and Technology During  
Opening Statements (NBI 2016)

### **NEVADA SUPREME COURT / APPELLATE CASES**

*City of Reno v. David Evans* (Case No. 63266)  
*Renown v. Arger et als* (Case No. 64455)  
*Matthew Boga v. TMC Group, Inc. / Matthew J. Fuller* (Case No. 62738/63531)  
*Patraw v. Nevada System of Higher Education, Milton Glick, Cary Groth*  
(Case No. 53918/54573)  
*Patraw v. Nevada System of Higher Education , Milton Glick, Cary Groth* (Injunction)  
(Case No. 55433)  
*Furer v. Furer* (Case No. 51198)  
*EES v. Gunnerman, Sulphco, Inc.* (Case No. 50324)  
*Darren Mack v. Michael E. Fondi* (Case No. 51536)  
*Landmark Homes v. Sierra Gateway*, 121 Nev. 1143, 152 P.3d 783 (2005)  
*Ferguson v. Sierra Gateway / Landmark* - 2007 (appeal from U.S. Bankruptcy Court)  
*Lexey Parker v. St. Mary's*, 121 Nev. 1174, 152 P.3d 809 (2005)  
*Farhadi v. CB Commercial*, 118 Nev. 1089, 106 P.3d 1209 (2002)  
*Farhadi v. CB Commercial*, 131 P.3d 589 (2004)  
*Hazelwood v. Harrah's*, 109 Nev. 1005, 862 P.2d 189 (1993)  
*Oak Grove Investors v. Bell & Gossett*, 108 Nev. 958, 843 P.2d 351 (1992)  
*Williams v. State Farm/Sierra Foods v. Williams*, 107 Nev. 574, 816 P.2d 466  
*State v. Batt*, 111 Nev. 1127, 901 P.2d 664 (1995)  
*Amoroso v. L & L Roofing*, 107 Nev. 294, 810 P.2d 775  
*Swain v. Meyer*, 104 Nev. 595, 763 P.2d 337 (1988)  
*State v. Kaplan*, 96 Nev. 798, 618 P.2d 354 (1980)  
*State v. Kaplan*, 99 Nev. 449, 663 P.2d 1190 (1983)  
*Bell v. ATO*  
*Eikelberger v. Tolotti*, 96 Nev. 525, 611 P.2d 1086 (1980)  
*Friedas v. Quinn River*, 101 Nev. 471, 705 P.2d 673 (1985)  
*Fondi v. Fondi*, 106 Nev. 856, 802 P.2d 1264 (1990)  
*State v. Fogarty*, 108 Nev. 1234, 872 P.2d 817 (1992)  
*State v. Bishop* (Death Penalty)  
*State v. Biederstadt / Hurt*, 92 Nev. 80, 545 P.2d 202 (1976)  
*State v. Lendon*, 92 Nev. 112, 546 P.2d 234 (1976)  
*Grand Sierra Resort v. Peppermill Casinos, Inc.* (pending)

**NINTH CIRCUIT COURT OF APPEALS:**

*Talisman Capital Talon Fund, Ltd. v. Gunnerman, Sulphco, Inc.* (Case No. 09-16256)

*Wild Game Ng v. Wong's International (USA) Corp.* (Case No. 08-15616)

*Hussein v. Dugan* (Case No. 08-17443)

*Montreux v. Pitts*, 130 Fed. Appx. 80 WL 663810CA9 (Nev. 2005)

*Shipman v. Allstate*

**GENERAL**

Born in Reno, Nevada 1947. Raised and educated in Reno, Nevada. Jury trials in state in and federal courts of six states. Received verdicts in over 100 jury trials. Ten Judgments over \$1,000,000 with total value in excess of \$600,000,000. Tried over 500 non-jury (court) trials.

Practice has included litigation experience in medical malpractice cases, both for plaintiffs and for defendants, and legal malpractice cases for both plaintiffs and defendants. Practice has included substantial experience in litigating premises liability cases for both plaintiffs and defendants. Practice has included substantial family law litigation. Practice has included substantial and extensive litigation for both plaintiffs and defendants with a focus on business torts. Practice has included substantial employment litigation. Practice has included substantial experience in litigating financial transactions, lender liability and collection efforts in commercial transactions for both plaintiffs and defendants. Practice has included substantial experience in litigating complex real estate transactions. Practice has included litigating environmental claims of substantial magnitude. Practice has included high profile criminal matters. Practice has included the representation of lawyers, judges and elected officials. Practice has included substantial and extensive litigation in personal injury matters for both plaintiffs and defendants. Practice has included challenging and defending regulatory agencies and political subdivisions of the State of Nevada.

Practice also includes substantial experience in handling trade secret litigation for Nevada gaming properties and other commercial entities. This practice includes representation of St. Mary's Hospital, Resolute Security Group and Nevada gaming properties concerning lists of priority players.



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6 (702) 597-5503 fax  
7 mconnot@foxrothschild.com

8 R. KEVIN SPENCER (*Admitted PHV*)  
9 Texas Bar Card No. 00786254  
10 ZACHARY E. JOHNSON (*Admitted PHV*)  
11 Texas Bar Card No. 24063978  
12 **SPENCER & JOHNSON, PLLC**  
13 500 N. Akard Street, Suite 2150  
14 Dallas, Texas 75201  
15 kevin@dallasprobate.com  
16 zach@dallasprobate.com  
17 *Attorneys for Petitioner Wendy A. Jaksick*

12 **SECOND JUDICIAL DISTRICT COURT**

13 **WASHOE COUNTY, NEVADA**

14 WENDY JAKSICK,  
15

16 Petitioner,

17 v.

18 TODD B. JAKSICK, INDIVIDUALLY, AS CO-  
19 TRUSTEE OF THE SAMUEL S. JAKSICK, JR.  
20 FAMILY TRUST, AND AS TRUSTEE OF THE  
21 SSJ'S ISSUE TRUST; MICHAEL S. KIMMEL,  
22 INDIVIDUALLY AND AS CO-TRUSTEE OF  
23 THE SAMUEL S. JAKSICK, JR. FAMILY  
24 TRUST; KEVIN RILEY, INDIVIDUALLY, AS  
25 FORMER TRUSTEE OF THE SAMUEL S.  
26 JAKSICK, JR. FAMILY TRUST, AND AS  
27 TRUSTEE OF THE WENDY A. JAKSICK 2012  
28 BHC FAMILY TRUST, INCLINE TSS, LTD.;  
DUCK LAKE RANCH, LLC; SAMMY  
SUPERCLUB, LLC SERIES A,

Respondents.

**CASE NO. PR17-00445**

**DEPT. NO. 15**

**CASE NO. PR17-00446**

**DEPT. NO. 15**

**PETITIONER WENDY A. JAKSICK'S**  
**OPPOSITION TO MOTION FOR**  
**ATTORNEY'S FEES**

//

//

1 Petitioner Wendy Jaksick (“Wendy”) hereby opposes the *Motion for Order Awarding*  
2 *Costs and Attorneys’ Fees for Todd B. Jaksick’s, Individually, Duck Lake Ranch, LLC’s and*  
3 *Incline TSS, LTD’s*<sup>1</sup> (the “Motion”). Wendy’s Opposition is based upon the papers and  
4 pleadings on file and the following memorandum of points and authorities.

5 **POINTS AND AUTHORITIES**

6 Todd begins his Motion stating that he has “a duty to other beneficiaries to pursue this  
7 motion and recover fees and costs that have been incurred as a result of Wendy’s failed attempt  
8 to hold Todd liable individually.” *See* Motion page 3 lines 2-3. This statement, and the rest of  
9 the contents of the Motion, show how self-interested Todd’s worldview and management of the  
10 Trusts have been. Todd fails to explain how seeking attorneys’ fees for *himself* is fulfilling his  
11 fiduciary duties as a Trustee of the Trusts; because it does not. Although the Court has not entered  
12 a final judgment on any of the claims in these cases, Todd has now filed a memorandum of costs,  
13 a motion to enter judgment on the jury verdict (contrary to Rule 54(b)) and well before this case  
14 is over – knowing this Court has set the equitable phase of the proceeding in May 2019. The  
15 equitable trial was set separate and after the jury trial at the request of Todd and now he wants  
16 to take advantage of that request by seeking a final ruling on certain issues before a final decision  
17 has been made. The latter is solely designed to cloud and confuse the appellate time-tables and  
18 deadlines and to gain a perceived advantage. Todd’s this Motion seeking a total of \$705,690.50  
19 in attorney’s fees against Wendy which represents his continued attempt to coerce Wendy into  
20 settlement. The Motion fails because (1) there is no basis to award attorneys’ fees pursuant to  
21 Rule 68 of the Nevada Rules of Civil Procedure; (2) Wendy had a reasonable basis for filing her  
22 counter-petition; and (3) the Motion is premature and, even if none of the latter were true, (4)  
23 the requested fees are not segregated and, as stated in his premature motion, he attempts to

24  
25  
26  
27 <sup>1</sup> Todd B. Jaksick, Individually, Duck Lake Ranch, LLC and Incline TSS, LTD are collectively  
28 referred to as “Todd.”

bootstrap fees of the SSJ Issue Trust with those of himself individually because each was represented by the same law firm.<sup>2</sup>

**A. Todd is not entitled to attorneys' fees based upon his offer of judgment.**

NRCP 68 governs offers of judgments and the penalties for rejecting such an offer. It is a mechanism to encourage settlement however it is not to be used "force plaintiffs to unfairly forego legitimate claims." *See Beattie v. Thomas* 99 Nev. 579, 587 668 P.2d 268, 274 (Nev. 1983)(citing *Armstrong v. Riggi*, 549 P.2d 753 (Nev. 1976). Rule 68(g) governs what is considered to determine whether the offeree of an offer of judgment, failed to obtain a more favorable judgment; it provides in relevant part:

If a party made an offer in a set amount that precluded a separate award of costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, the court must compare the amount of the offer, together with the offeree's pre-offer taxable costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, with the principal amount of the judgment.

Here, both of Todd's offers of judgment were for the "total sum of TWENTY-FIVE THOUSAND DOLLARS and 00/100 (\$25,000.00) and no more, which sum includes all interest, costs, attorneys' fee or otherwise which have accrued to date. *See Exhibits 4 and 5 to the Motion.* Wendy does not dispute that the jury awarded her \$15,000 through its verdict, however, that amount taken with any prejudgment interest, her attorneys' fees and costs far exceeds the \$25,000.00 offer made by Todd. As of August 29, 2018, the date the offers of judgment were served upon Wendy, Wendy had incurred approximately \$17,700 in costs alone.<sup>3</sup> *See detail of expenses incurred through August 29, 2018 attached hereto as Exhibit "1".* Wendy incurred well

<sup>2</sup> "All costs incurred by Todd, individually, and as Trustee of the SSJ Issue Trust, should be awarded under Rule 68. Maupin, Cox & LeGoy represent Todd as Trustee of the SSJ Issue Trust. Hence, to the extent these points and Authorities refer to Todd as Trustee of the SSJ Issue Trust, it is intended that the actual fees and costs to which Todd is entitled and should be awarded are governed by the Memorandum of Costs and Motion for Costs and Attorneys Fees filed herein by Maupin, Cox & LeGoy." *See Motion for Order Awarding Costs and Attorneys' Fees for Todd Jaksick, Individually, Duck Lake Ranch, LLC and Incline TSS, Ltd., Page 4.*

<sup>3</sup> This figure is exclusive of travel costs.

1 in excess of that amount in attorneys' fees. Thus, Wendy well exceeded the amount offered by  
2 Todd and therefore Todd is not entitled to attorneys' fees pursuant to NRCP 68.<sup>4</sup>

3 **B. Todd is not entitled to attorneys' fees because Wendy's counter-petition was not**  
4 **filed in bad faith or to harass Todd.**

5 A district court has discretion to award attorney fees to a prevailing party when it finds  
6 that the opposing party brought or maintained a claim without reasonable grounds, however,  
7 there must be evidence supporting the court's finding that the claim was unreasonable or brought  
8 to harass. *See Frederic and Barbara Rosenberg Living Trust v. MacDonald Highlands Realty,*  
9 *LLC*, 427 P.3d 104, 134 Nev. Adv. Op 68 (Nev. 2018). Generally, a claim is groundless if the  
10 allegations in the complaint are not supported by any credible evidence at trial. *N.R.S. 18.010,*  
11 *subd. 2(b). Bobby Berosini, Ltd. v. People for the Ethical Treatment of Animals*, 971 P.2d 383,  
12 114 Nev. 1348 (Nev. 1998).

13 There is no evidence before the Court that Wendy brought or maintained her case to  
14 harass Todd or without any reasonable basis; in fact, the evidence illustrated that Todd did  
15 everything in his power to take a position opposite of his beneficiary. *First*, there is no evidence  
16 that the fact that her counter petition was signed by her counsel, who was admitted to practice in  
17 this state, was prejudicial in any way to Todd. Additionally, Wendy filed a *Notice of Errata*  
18 verifying her *First Amended Counter-Petition* correcting any purported deficiency with the  
19 Verification included in her original pleading. This is just a red-herring to tack on to the other  
20 inaccurate references in the Motion intended to inflame the Court against Wendy.

21  
22  
23 <sup>4</sup> Even assuming Wendy failed to obtain a more reasonable judgment, the court must carefully  
24 consider four factors in exercising its discretion to allow fees and costs pursuant to NRCP 68.  
25 *See Beattie* 99 Nev. 587, 274. These factors include: (1) whether the plaintiff's claim was  
26 brought in good faith; (2) whether the defendants' offer of judgment was reasonable and in  
27 good faith in both its timing and amount; (3) whether the plaintiff's decision to reject the offer  
28 and proceed to trial was grossly unreasonable or in bad faith; and (4) whether the fees sought  
by the offeror are reasonable and justified in amount. *See Id.* For reasons stated in elsewhere in  
this Opposition, the factors do not weigh in favor of awarding attorneys' fees and costs  
Wendy's claims were brought in good faith, Todd's offer was not reasonable in its amount and  
Wendy did not reject it in bad faith because Wendy incurred significant attorneys' fees and  
costs prior to the offers of judgment.

1       *Second*, Todd individually is an indispensable party<sup>5</sup> to this action because he benefited  
2 personally from the ACPAs and the Indemnification Agreement, all of which Wendy is seeking  
3 to be set aside. To the extent that those documents are declared void and the transactions undone,  
4 Todd as an individual would be impacted and his rights affected. Additionally, Wendy sought  
5 damages, fees and costs from Todd, in his Individual capacity, for his breaches of fiduciary duty  
6 in his capacity as Trustee and Co-Trustee. Any award of damages, fees or costs for Todd's  
7 actions as Trustee and Co-Trustee should be paid by Todd, personally, not the Trusts. It is legally  
8 impossible to get money of any trust back from a trustee – Todd in this case – without due  
9 process. If he possesses property that belongs to or formerly belonged to any Trust, then in order  
10 for the Court to require it to be returned or disgorged, Todd must be sued and offered due process.  
11 Therefore, he had to be named a party to this action.

12       *Third*, with respect to the production of documents, it is without argument that Todd and  
13 the Trustees failed to produce documents to Wendy in a timely manner. There were  
14 approximately 18,000 pages of documents that were produced to Wendy approximately two  
15 months prior to trial. Most of the documents were produced by Todd or through his agents.  
16 Further, Wendy had to move for orders from the Court requiring the production of these  
17 documents, and documents were still being produced a week before trial. Their conduct was  
18 deliberate and designed to harm Wendy and deprive her of her due process rights. Todd, as  
19 trustee of both trusts, had the knowledge, information and documents, which he was required to  
20 provide to the beneficiaries of the Trusts. Now, one basis for which he seeks to be awarded  
21 individually, is that Wendy requested those documents and pursued her discovery rights. There  
22 is no evidence that Wendy acted “vexatiously” filing a lawsuit against her Trustees. If a  
23 beneficiary of a trust cannot sue her fiduciary trustee or she will be punished when she believes  
24 that trustee is not performing or is mismanaging or about to mismanage trust property, then all  
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27       <sup>5</sup> Stanley Jaksick also sued Todd in his individual capacity and as Trustee of the Family and  
28 Issue trusts. *See* Amended Objection and Counter-Petitions filed by Stanly Jaksick.

1 trustees have a license to steal the trust with impunity. Wendy should not be punished for  
2 pursuing her rights.

3 *Fourth*, Wendy's accusations of forgery against Todd were well supported by the  
4 evidence presented at trial by Wendy as well as by Stan, a Co-Trustee of the Family Trust.  
5 Additionally, the file of Todd's own expert James Green, which was admitted as Trial Exhibit  
6 221, confirmed the numerous irregularities concerning the Second Amendment to the Family  
7 Trust (Trial Exs. 13 & 202). There were clear alterations made to numerous documents after  
8 they were originally signed including, but not limited to, the Todd's purported Indemnification  
9 Agreement (Trial Exhibits 11, 11A, 11B & 548), the Lake Tahoe Option Agreement (Trial  
10 Exhibit 23.5 & 542), and the Second Amendment to the Family Trust.

11 *Fifth*, Wendy's financial responsibility or irresponsibility, and any previous actions and  
12 allegations are irrelevant. Todd was Wendy's fiduciary and the Jury Verdict confirms he  
13 breached his fiduciary. Implicit in that decision is that Todd did not show that his conduct in  
14 relation to the Trusts benefitted all of the beneficiaries of the Trusts. Todd initiated these cases  
15 seeking a Court order approval his (and the other co-trustees of the Family Trust) actions and  
16 administration of the Trusts. The Accountings are deficient on their face and neither Todd nor  
17 Michael Kimmel could swear to their contents. Stan refused to join the co-trustees' petition, filed  
18 his own objections to the original petitions, and sued Todd for breaching his fiduciary duties as  
19 well. Throughout trial, and this Motion, Todd attempts to use Wendy's alleged prior acts which  
20 have no probative value in this case, to prejudice Wendy. For example, Todd admitted an exhibit  
21 into evidence (Exhibit 23.41) for the sole purpose of prejudicing and inflaming the jury's  
22 emotions. Todd he affirmatively asserted the statement to the Court that "Wendy maliciously  
23 accused her brother Stan of molesting his children." See Motion, Page 7. Exhibit 23.41 was the  
24 only evidence that even mentions the accusation and does not say what Todd misrepresents to  
25 the Court it says. It, apparently, was Stan's ex-wife, not Wendy, that made that accusation.

26 *Sixth*, Wendy produced a detailed NRCP 16.1 computation of damages. If Todd or any  
27 other party thought same was deficient, they failed to seek to compel Wendy to amend or  
28

1 supplement same. Wendy was never provided full disclosure concerning the administration of  
2 the Trusts and the assets of the Trusts and was forced to compel the production of much of the  
3 information she did received. Todd's actions made it impossible for Wendy to prepare a more  
4 detailed NRCP 16.1 computation of damages. Todd first provided Wendy with information  
5 regarding water rights less than a month before trial. Further, without providing anything  
6 substantiate his claim prior to trial, Todd testified he was about ready to distribute \$4,000,000.00  
7 to Wendy. Despite requesting any evidence or information that the latter was true or where it  
8 might come from, Todd has refused to provide that information. Wendy should not be punished  
9 for not producing a computation of damages when she was actively prevented from obtaining  
10 information regarding the administration of the Trusts.

11 *Seventh*, it was impossible to develop discovery and to find out information from Duck  
12 Lake, LLC, Incline TSS or Sammy Supercub, LLC or any of the other entities because each of  
13 those entities are controlled by Todd. Despite Todd telling this Court and this jury that Kevin  
14 Riley was an "open-book" and "always available to Wendy and the beneficiaries to find out  
15 information", the truth is that he was not. For example there are e-mails saying Riley could not  
16 provide information to Wendy without Todd authorizing it. Further, Riley testified in his  
17 deposition he could not reveal information regarding certain entities without the Manager of that  
18 entity – Todd – authorizing it because he had a duty of confidentiality to preserve as the  
19 accountant for those entities. Notwithstanding that Riley was the Trustee of the 2012 BHC Trusts  
20 that owns an interest in Bright-Holland, he decided his duty of confidentiality with the entity  
21 was more important than providing the information to the BHC Trusts' beneficiaries. The point  
22 is: Riley was not the "open-book" Todd claimed and Todd intentionally prohibited disclose of  
23 information regarding entities. Then, he used his deliberate refusal to comply with discovery  
24 rules and his legal requirement to disclose information and his refusal to produce documents  
25 against Wendy claiming she had no evidence implicating the entities.

26 *Eighth*, the damages amount sought by Wendy was reasonable in light of the undisputed  
27 and uncontroverted evidence regarding the value of the water rights. The evidence regarding the  
28

1 Lake Tahoe Property, the Bright-Holland/Fly-Geyser sale and the Bronco Billy's sale was  
2 prominent in the record and reflected Wendy's one-third interest at no less than \$10,000,000.  
3 The evidence related to the water rights was that were 140,000 acre/feet and that Todd's  
4 testimony regarding the average price was \$7,000.00 per acre/foot. On the low-side of that value,  
5 Wendy's one-third interest in the Jaksick water rights are worth more than \$70,000,000.00. The  
6 evidence supported these numbers.

7 As discussed above and as is supported by the record, Wendy had a reasonable basis to  
8 bring and maintain her counter-petition, thus an award of attorneys' fees is not warranted.

9 **C. The Motion is premature as a final judgment has not been entered on all of the**  
10 **claims in these cases.**

11 Wendy has addressed this argument in both her opposition to Todd's *Memorandum of*  
12 *Costs* as well as in her opposition to Todd's *Motion for Entry of Judgment on Jury Verdict*.  
13 Wendy incorporates her previous oppositions fully hereto and states that Todd is not entitled to  
14 any fees and costs because he is not a prevailing party to this matter. Wendy incorporates fully  
15 both arguments in her oppositions.

16 In the event, the Court would consider awarding attorneys' fees and expenses, Wendy is  
17 a beneficiary of the Trusts and is entitled a credit for her share of any amount found to be owed  
18 to the Trust, which she pleads for and claims herein.

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III.

CONCLUSION

For the reasons stated above, Todd is not entitled to attorneys' fees and costs under any theory of available to him under Nevada law. Therefore, Wendy respectfully requests the Court to deny Todd's Motion.

AFFIRMATION

Pursuant to NRS 239B.030

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 25<sup>th</sup> day of March, 2019.

FOX ROTHSCHILD LLP

/s/ Mark J. Connot

Mark J. Connot (10010)  
1980 Festival Plaza Drive, #700  
Las Vegas, NV 89135  
mconnot@foxrothschild.com

SPENCER & JOHNSON, PLLC

/s/ R. Kevin Spencer

R. Kevin Spencer (*Admitted PHV*)  
Zachary E. Johnson (*Admitted PHV*)  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasproabte.com  
zach@dallasprobate.com  
*Attorneys for Respondent Wendy A. Jaksick*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of FOX ROTHSCHILD LLP and that on this 25<sup>th</sup> day of March, 2019, I served a true and correct copy of **PETITIONER WENDY A. JAKSICK'S OPPOSITION TO TODD JAKSICK'S MOTION FOR ATTORNEYS' FEES AND COSTS** by the Court's electronic file and serve system addressed to the following:

Kent Robison, Esq.  
Therese M. Shanks, Esq.  
Robison, Sharp, Sullivan & Brust  
71 Washington Street  
Reno, NV 89503  
*Attorneys for Todd B. Jaksick, Beneficiary  
SSJ's Issue Trust and Samuel S. Jaksick, Jr.,  
Family Trust*

Donald A. Lattin, Esq.  
L. Robert LeGoy, Jr., Esq.  
Brian C. McQuaid, Esq.  
Carolyn K. Renner, Esq.  
Maupin, Cox & LeGoy  
4785 Caughlin Parkway  
Reno, NV 89519  
*Attorneys for Todd B. Jaksick and  
Michael S. Kimmel as Trustees of the  
SSJ's Issue Trust and Samuel S. Jaksick,  
Jr., Family Trust*

Philip L. Kreitlein, Esq.  
Kreitlein Law Group  
1575 Delucchi Lane, Ste. 101  
Reno, NV 89502  
*Attorneys for Stanley S. Jaksick*

Adam Hosmer-Henner, Esq.  
McDonald Carano  
100 West Liberty Street, 10<sup>th</sup> Fl.  
P.O. Box 2670  
Reno, NV 89505  
*Attorneys for Stanley S. Jaksick*

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 25<sup>th</sup> day of March, 2019.

/s/ Amanda Hunt  
An Employee of Fox Rothschild LLP

LIST OF EXHIBITS

<u>EXHIBIT NO.</u>	<u>DOCUMENT</u>	<u>PAGES</u>
1	W. Jaksick's incurred expenses through August 29, 2018	4

FILED  
Electronically  
PR17-00445  
2019-03-25 09:05:37 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7184268 : csulezic

## **Exhibit 1**

# SPENCER LAW, P.C.

Ross Tower  
500 N. Akard St., Ste 2150  
Dallas, TX 75201-3302  
(214) 965-9999  
(214) 965-9500 Fax

Wendy Jaksick  
6501 Meyers Way, Apt. 705  
McKinney, TX 75070

Statement Date:	March 25, 2019
Statement No.	4544
Account No.	2645.00
Page:	1

Estate of Samuel S. Jaksick, Jr.

**DRAFT**

Wendy Jaksick  
Account No. 2645.00

Statement Date: 03/25/2019  
Statement No. 4544  
Page No. 13

EXPENSES

11/09/2017	Litigation Support - Applications of Association (SLPC Ck # 1896 & 1897)	1,100.00
11/10/2017	Litigation Support - State Bar of Texas, Letter of Good Standing (SLPC ck # 1898)	50.00

Wendy Jaksick  
Account No. 2645.00

Statement Date: 03/25/2019  
Statement No. 4544  
Page No. 14

12/19/2017	Litigation Support - State Bar of Texas - Letters of Good Standing x4 (SLPC ck#1925)	100.00
12/19/2017	Postage - State Bar of Texas	1.34
03/09/2018	Wifi/Internet charge - ZEJ	12.00
05/02/2018	Outside photocopy charges - Pinnacle Reprographics - documents for Discover (Inv#D-13119)	2,373.62
05/25/2018	Travel expense - RKS & ZEJ flights to Reno for Wendy depositions (American Airlines \$726 Kevin and \$778.40 ZEJ and bag fees o AA \$100	1,604.80
05/31/2018	Travel expense - Hotel in Reno for Wendy's Depo (6/3/18-6/7/18)	781.51
06/04/2018	Outside photocopy charges - Fedex in Reno for Depo of Wendy	54.16
07/06/2018	Travel expense - SWA to Reno For RKS & ZEJ for Aug 12-18	1,548.76
07/18/2018	Travel expense - Kevin's & Zach flight to Reno for Aug 5-9th	837.56
07/18/2018	Travel expense - SWA to Reno RKS & ZEJ on Aug 28-Sept 1	1,006.20
07/20/2018	Postage - CMRRR - Notary Demand	6.78
07/30/2018	Postage - CMRRR - Notary Demand	6.78
08/01/2018	Postage - CMRRR - Notary Demand	13.16
08/03/2018	Postage - CMRRR - Notary Demand	6.58
08/06/2018	Travel expense - Pepermill Hotel for the week (Stan's Depo)	1,237.90
08/07/2018	Travel expense - ZEJ cab at airport	20.00
08/09/2018	Travel expense - week of Aug 6 Reno for Stan's Depo - Food, Ubers (\$45)and Fed ex copies (\$43.60)	450.00
08/09/2018	Photocopy charges - paper and binders to prepare for Depos	50.00
08/10/2018	Travel expense - ZEJ additional days for Wendy's Depo - \$575+110 American Airlines, \$267 Hotel and \$100 food	1,052.00
08/13/2018	Travel expense - SWA flight for this week depos - ZEJ	397.96
08/13/2018	Travel expense - Hotel for week of depo of Todd - Peppermill	1,271.97
08/14/2018	Travel expense -Zach SWA \$545+ \$147/Fedex \$42.40/Food \$100/Uber from Airport \$30	864.40
08/17/2018	Travel expense - 2 American Airlines tickets back early from Todds deps	1,148.40
08/17/2018	Travel expense - for week - food, parking etc for the stay	1,000.00
	Total Expenses	16,995.88

ADVANCES

11/09/2017	Filing fee - State Bar of Texas for Letter in Good Standing for Kevin & Zach (SLPC ck#1895)	150.00
01/02/2018	Filing fee - 2 Jury Demands (\$320 ea) to Fox Rothschild LLP	640.00
	Total Advances	790.00

**Jaksick 180963**

<b>Date of Service</b>	<b>Vendor</b>	<b>Amount</b>	<b>Date Paid</b>
5/8/18	Veritext	445.00	7/25/18
6/20/18	Captions Unlimited	1,730.08	7/24/18
7/26/18	Captions Unlimited	394.80	8/1/18
8/13/18	Nationwide Legal	65.00	9/19/18
8/13/18	Bonanza Reporting	547.10	8/31/18
8/13/18	Nationwide Legal	150.00	9/19/18
8/14/18	Bonanza Reporting	508.35	9/5/18
8/15/18	Veritext	1,885.70	10/1/18
8/16/18	Seneca dba Holo Discovery	132.28	8/31/18
8/15/18	Nationwide Legal	150.00	9/19/18
8/16/18	Nationwide Legal	175.00	9/19/18
8/16/18	Veritext	1,483.80	10/1/18
8/17/18	Seneca dba Holo Discovery	613.89	8/31/18
8/17/18	A Corrao Video Service Company	1,754.99	8/24/18
8/23/18	Captions Unlimited	1,808.10	8/31/18
8/23/18	Captions Unlimited	1,096.55	9/26/18
	<b>Subtotal:</b>	<b>12,940.64</b>	
8/7/18	Inhouse photocopying	394.40	
8/15/18	Westlaw Research	13.69	
8/16/18	Westlaw Research	4.51	
	<b>Subtotal:</b>	<b>412.60</b>	
	<b>Total:</b>	<b>13,353.24</b>	



**Jayne Ferretto**

---

**From:** eflex@washoecourts.us  
**Sent:** Tuesday, March 26, 2019 10:29 AM  
**To:** Kent Robison  
**Cc:** Jayne Ferretto  
**Subject:** NEF: CONS: TRUST: SSJ'S ISSUE TRUST: Opposition to: PR17-00445

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*

**PROOF OF SERVICE OF ELECTRONIC FILING**

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**A filing has been submitted to the court RE: PR17-00445**

**Judge:** HONORABLE DAVID A. HARDY

**Official File Stamp:** 03-25-2019:21:05:37  
**Clerk Accepted:** 03-26-2019:10:27:56  
**Court:** Second Judicial District Court - State of Nevada  
Civil  
**Case Title:** CONS: TRUST: SSJ'S ISSUE TRUST  
**Document(s) Submitted:** Opposition to  
- \*\*Continuation  
**Filed By:** Mark Connot

You may review this filing by clicking on the following link to take you to your [cases](#).

This notice was automatically generated by the courts auto-notification system.

---

If service is not required for this document (e.g., Minutes), please disregard the below language.

**The following people were served electronically:**

PHILIP L. KREITLEIN, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST  
ADAM HOSMER-HENNER, ESQ. for STANLEY JAKSICK  
DONALD ALBERT LATTIN, ESQ. for KEVIN RILEY, MICHAEL S. KIMMEL, TODD B. JAKSICK  
STEPHEN C. MOSS, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST  
CAROLYN K. RENNER, ESQ. for KEVIN RILEY, MICHAEL S. KIMMEL, TODD B. JAKSICK  
MARK J. CONNOT, ESQ. for WENDY A. JAKSICK  
THERESE M. SHANKS, ESQ. for DUCK LAKE RANCH LLC et al  
SARAH FERGUSON, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST, SSJ'S ISSUE TRUST  
KENT RICHARD ROBISON, ESQ. for DUCK LAKE RANCH LLC et al

**The following people have not been served electronically and must be served by traditional means (see Nevada Electronic Filing Rules.):**

R. KEVIN SPENCER, ESQ. for WENDY A. JAKSICK

ZACHARY JOHNSON, ESQ. for WENDY A. JAKSICK