

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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Elizabeth A. Brown
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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	5.19.20	20	TJA003453-003456
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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 13th day of April, 2021.

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

/s/ Therese M. Shanks, Esq.
KENT R. ROBISON (SBN #1167)
THERESE M. SHANKS (SBN #12890)
Attorneys for Appellant/Cross-Respondent
Todd B. Jaksick, in his individual capacity

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. 16**, 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.

Christine O'Brien
Employee of Robison, Sharp, Sullivan
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11 *Attorneys for Petitioners*

12
13 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
14
15 IN AND FOR THE COUNTY OF WASHOE

16 In the Matter of the: Case No.: PR17-0445
17 Dept. No.: 15
18 SSI's ISSUE TRUST.

19 _____/ Consolidated

20 In the Matter of the Administration of Case No.: PR17-0446
21 Dept. No.: 15
22 THE SAMUEL S. JAKSICK, JR., FAMILY TRUST.

23
24 **MOTION FOR ATTORNEYS' FEES AND COSTS**

25 MICHAEL S. KIMMEL, individually and as Co-Trustee of The Samuel S. Jaksick, Jr.
26 Family Trust ("Kimmel"), by and through his undersigned counsel of record, hereby files his
27 Motion for Attorneys' Fees pursuant to NRCP 68, NRS 18.010, NRS 18.020, NRS 18.005, and
28 NRS 7.085.

29 This Motion is made based on the pleadings and documents on file and the attached
30 Memorandum of Points and Authorities, and all of the records, documents, pleadings, and papers

1 on file or to be filed in the above-entitled matter, arguments of counsel and any other matters that
2 may properly come before the Court for its consideration of this Motion.

3 Dated this 9th day of April, 2020.

4 MAUPIN, COX & LEGOY

5
6
7 By: 

8 Donald A. Lattin, NSB # 693
9 Carolyn K. Renner, Esq. NSB #9164
10 4785 Caughlin Parkway
11 Reno, NV 89519
12 *Attorneys for Petitioners*

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 **I.**
15 **PREFATORY STATEMENT**

16 Kimmel understands his role as Co-Trustee of the Family Trust and his fiduciary duties
17 to Wendy Jaksick ("Wendy") as a beneficiary under the Family Trust, as well as to all other
18 beneficiaries under the Family Trust.

19 Wendy sued Kimmel in his capacity as Co-Trustee and in his individual capacity thereby
20 creating an adversarial relationship. Kimmel's duty to the other beneficiaries of the Family Trust
21 requires that he pursue all rights and remedies afforded him under Nevada law. Accordingly, he
22 has an obligation to pursue this motion for attorneys' fees and costs incurred as a result of
23 Wendy's failed attempt to hold Kimmel liable in his individual capacity and in his capacity Co-
24 Trustee of the Family Trust in the above-referenced lawsuits.

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**II.
STATEMENT OF RELEVANT FACTS**

These consolidated cases were initiated on August 2, 2017 with the filing of the “Petition for Confirmation of Trustee and Admission of Trust to the Jurisdiction of the Court and for Approval of Accountings and other Trust Administration Matters” in each respective case. Nearly one year later, on April 30, 2018, Kimmel served an Offer of Judgment pursuant to NRCPC 68 on Wendy in an attempt to settle this matter as to him. Wendy rejected the offer. The Offer of Judgment is attached hereto as Exhibit “1.”

The cases went to jury trial for eleven (11) days commencing on Thursday, February 14, 2019. Wendy claimed damages in excess of Eighty Million Dollars (\$80,000,000.00). On March 4, 2019, the jury returned their verdict. *See* Verdict, attached hereto as Exhibit “2.” The jury found in favor of Kimmel on all claims made against him both individually and as Co-Trustee of the Family Trust.

On May 13, 2019, this Court began a bench trial to address the equitable claims in this litigation. The parties stipulated to submit closing trial statements. After supplemental briefing ordered by the Court, this Court entered its Order After Equitable Trial on March 12, 2020. *See* Order, attached hereto as Exhibit “3.” The Court did not assign liability to Kimmel on any claims made against him both individually and as Co-Trustee of the Family Trust.

As set forth in the Lattin Affidavit attached hereto as Exhibit “4,” since service of the Offer of Judgment on April 30, 2018, the Family Trust has incurred the total sum of \$498,646.25 in attorneys’ fees that have been paid to the law firm of Maupin, Cox & LeGoy (the “Law Firm”). The amount of those fees allocated for the defense of Kimmel in his individual capacity and as Co-Trustee of the Family Trust is twenty-five percent (25%), based on his being one of four Co-

1 Trustees and former Co-Trustees of the Family Trust sued in this matter. There was no allocation
2 from Wendy with respect to damages attributable to each respective Co-Trustee, and as such, the
3 Family Trust had to be defended as a whole and one way to split the cost of defense is to divide
4 the total amount by the number of Co-Trustees sued. Accordingly, Kimmel's share would be
5 25% of the total cost. Twenty-five percent of the total amount billed to the Family Trust after
6 service of the Offer of Judgment is $\$498,646.25 \times .25 = \$124,616.56$.

7
8 Since serving the April 30, 2018 Offer of Judgment, Kimmel's share of the fees is
9 $\$124,616.56$. This amount is based on the attorney time as follows:

10 **Family**
11 **Trust**
12 17454.008

Attorney	Hours Post 4/30/18	Fees Post 4/30/18
DAL	723.25	\$ 325,462.50
LRL	53.50	\$ 22,768.75
BCM	24.25	\$ 8,487.50
CKR	293.25	\$ 95,943.75
KDM	219.45	\$ 45,983.75
Total	1,313.70	\$ 498,646.25

17
18 Attached hereto as Exhibit "5," is the Memorandum of Costs and Disbursements filed in
19 this matter. Kimmel's share of these costs is $\$104,279.93 \times 0.25 = \$26,069.98$, based on his 25%
20 allocation.

21 For the reasons set forth below, Kimmel is entitled to recover his fees and costs under
22 both statute and rule. Pursuant to NRS 18.010 (2)(b), Kimmel is entitled to recover all of his
23 fees. Pursuant to NRS 18.020(3), Kimmel is entitled to recover all of his costs. Additionally,
24 pursuant to NRCP 68, Kimmel is entitled to recover all reasonable fees and costs incurred after
25 the date of his offer.
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III.

ARGUMENT

A. Kimmel is entitled to recover costs under NRS 18.020

Nevada Revised Statute 18.020 provides that “[c]osts must be allowed of course to the prevailing party against any adverse party against whom judgement is rendered . . . [i]n an action for the recovery of money or damages, where the plaintiff seeks to recover more than \$2,500.” NRS 18.020(2) (emphasis added). The Nevada Supreme Court has enforced the plain language of this statute. *Schwartz v. Estate of Greenspan*, 110 Nev. 1042, 1050, 818 P.2d 638, 643 (1994) (“An award of costs to the prevailing party is mandated where, as here, damages were sought in an amount in excess of \$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.”). Here, Kimmel is the prevailing party as the jury returned a verdict in favor of Kimmel and against Wendy on all claims asserted against Kimmel both individually and as Co-Trustee of the Family Trust. Wendy sought to recover more than \$80,000,000 in damages. She recovered nothing from Kimmel. As prevailing party, under NRS 18.020(2), Kimmel must be allowed to recover his costs against Wendy.

Attached hereto as Exhibit “5,” is the Memorandum of Costs and Disbursements filed in this matter, which reflects the costs incurred as a result of defending this case against Wendy. Kimmel’s share of those costs is \$26,069.98. Kimmel respectfully requests that his Court award his costs in this matter.

B. Kimmel is entitled to recover fees under NRS 18.010(2)(b).

Nevada Revised Statute 18.010(2)(b) allows a prevailing party to recover all attorneys’ fees when the Court finds that the plaintiff’s claims were “brought or maintained without

1 reasonable ground or to harass the prevailing party.” Additionally, NRS 18.010(2)(b) provides
2 that the “court shall liberally construe the provisions of this paragraph in favor of awarding
3 attorney’s fees in all appropriate situations.” (Emphasis added).

4 Wendy’s claims against Kimmel as an individual and as Co-Trustee of the Family Trust
5 were brought without reasonable grounds and were intended to harass. She did not pursue her
6 claims against Kimmel in good faith. Wendy’s intensions are illustrated by the following
7 observations:
8

- 9 1. When asked why Wendy had sued Kimmel as an individual, she claimed that he
10 “caused her harm by listening to Todd . . . and voting against [her] because he
11 thought that [she] was not a good person.” See Deposition transcript of Wendy,
12 dated June 6, 2018 at 753:8-16, attached hereto as Exhibit “6.”
- 13 2. Wendy admitted that Kimmel should not have been named individually in these
14 lawsuits. See *id.* At 757:6-18.
- 15 3. Wendy’s claims of breach of fiduciary duty involve actions which occurred prior
16 to Kimmel becoming Co-Trustee of the Family Trust. Kimmel became the third
17 Co-Trustee, along with Stanley Jaksick (“Stan”) and Todd Jaksick (“Todd”) on
18 December 23, 2016 and did not become involved with Trust matters until in or
19 around January 2017. See Deposition of Michael Kimmel, dated July 6, 2018 at
20 11:14-20, attached hereto as Exhibit “7.”
 - 21 a. The Second Amendment to the Family Trust, which Wendy claimed was
22 forged was executed in December of 2012, four years before Kimmel
23 became Co-Trustee.
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- b. The Tahoe Property was transferred from the Family Trust to SSJ, LLC in December 2011 (five years before Kimmel became a Co-Trustee) and transferred to Incline TSS, Ltd. in December 2012 (four years before Kimmel became a Co-Trustee).
 - c. The insurance proceeds were used to pay down the mortgage on the Tahoe House in June 2013, more than three years before Kimmel became a Co-Trustee.
 - d. The indemnification agreements were executed in 2008, more than eight years before Kimmel became a Co-Trustee.
 - e. The sale of Fly Ranch occurred in May 2016, several months before Kimmel became Co-Trustee.
 - f. The sale of Bronco Billy's occurred in 2015, more than a year before Kimmel became a Co-Trustee.
4. In spite of the clear evidence of Kimmel's lack of involvement in the actions of which Wendy complained, she proceeded against him in this litigation through to the end of the trial, never dismissing him despite requests from Kimmel's counsel to do so.
5. At trial, Wendy's lawyers simply lumped all of the actions of all Co-Trustees together as if Todd, Stan, Kimmel and Kevin Riley were involved in every bad act that Wendy complained of regardless of when each respective Co-Trustees' term began and/or ended.

- 1 6. Wendy never made specific allegations that would implicate Kimmel
2 individually, yet she proceeded to trial against him individually despite requests
3 from his counsel to dismiss him individually.
4 7. Wendy never identified damages specifically resulting from any breach of
5 Kimmel's fiduciary duty as a Co-Trustee, or from any action by him individually.
6 8. When Wendy filed her Counter-Petition it was not verified by Wendy, but by her
7 counsel.
8

9 The foregoing are clear examples of Wendy's bad faith litigation against Kimmel in these
10 actions and as such NRS 18.010(2)(b) applies and should be liberally construed against Wendy
11 and in favor of awarding attorney's fees. The fees incurred in defending this action against
12 Wendy are set forth in the Lattin Affidavit attached hereto as Exhibit 4. Kimmel's share of those
13 fees is \$124,616.56 based on his 25% share of the total cost to defend the Family Trust since
14 service of the Offer of Judgment. Kimmel respectfully requests that this court award his
15 attorney's fees pursuant to NRS 18.010(2)(b).
16

17 **C. Alternatively, Kimmel is entitled to fees and costs pursuant to NRCP 68.**

18 As a separate and distinct basis to recover fees and costs, Kimmel is entitled to recover
19 reasonable fees and costs under NRCP 68. Nevada Rule of Civil Procedure 68 governs offers of
20 judgment and provides that the district court may award attorney's fees and costs to a party who
21 makes an offer of judgment when the offeree rejects the offer and the judgment ultimately
22 obtained is less favorable than the offer. *See Chavez v. Sievers*, 118 Nev. 288, 296, 43 P.3d 1022
23 (2002). As stated by the Nevada Supreme Court in *Dillard Dep't Stores, Inc. v. Beckwith*, 115
24 Nev. 372, 989 P.2d 882 (1999):
25
26

1 The purpose of NRS 17.115 and NRCP 68 is to save time and money
2 for the court system, the parties and the taxpayers. They reward a
3 party who makes a reasonable offer and punish the party who refuses
4 to accept such an offer.

5 *Dillard*, 115 Nev. at 382.

6 Here, Kimmel obtained a more favorable judgment than the offer, *i.e.*, Kimmel offered
7 to settle this matter for more than what Wendy ultimately received in this case at trial, as related
8 to Kimmel, which was nothing. Kimmel made an Offer of Judgment on April 30, 2018 for \$500.
9 *See* Offer of Judgment, attached hereto as Exhibit "1." The jury found in favor of Kimmel at
10 trial and awarded Wendy nothing for her claims against him individually and as Co-Trustee of
11 the Family Trust. *See* Verdict, attached hereto as Exhibit "2." Likewise, in this Court's Order
12 after the equity trial, Wendy did not prevail on her claims against Kimmel. *See* Ex. 3. Whether
13 to award costs and attorney fees pursuant to NRCP 68 lies within the discretion of the district
14 court. *Chavez*, 118 Nev. at 296. When exercising this discretion, the district court is required to
15 evaluate the following factors from *Beattie v. Thomas*:

16 (1) whether the plaintiff's claim was brought in good faith; (2)
17 whether the defendant's offer of judgment was reasonable and in
18 good faith in both its timing and amount; (3) whether the plaintiff's
19 decision to reject the offer and proceed to trial was grossly
20 unreasonable or in bad faith; and (4) whether the fees sought by the
21 offeror are reasonable and justified in amount.

22 *Id.* (citing *Beattie v. Thomas*, 99 Nev. 579, 588, 668 P.2d 268, 274 (1983)). No one *Beattie* factor
23 is determinative. *Yamaha Motor Co., U.S.A. v. Arnoult*, 114 Nev. 233, 252, n.16, 955 P.2d 661
24 (1998). In this case, the *Beattie* factors weigh heavily in support of granting an award of
25 attorneys' fees for Kimmel.
26

1. Wendy's claims against Kimmel were not brought in good faith.

As set forth in detail above, Wendy's claims against Kimmel, both individually and as Co-Trustee of the Family Trust were not brought in good faith. Wendy expressly stated in her deposition that she had no basis to name Kimmel as an individual. Furthermore, she could not clearly communicate what exactly he did as a Co-Trustee of the Family Trust that resulted in a breach of his fiduciary duties to her. Indeed, all of the actions of which Wendy complained occurred well before Kimmel became Co-Trustee. Wendy knew the dates of Kimmel's involvement as Co-Trustee and she knew that he had no involvement in the actions for which she claimed a breach of fiduciary duties, and she knew all of this well before she initiated the instant litigation.

Furthermore, under Article IV, paragraph C, the Family Trust expressly provides that no successor Trustee is to be liable for any act, omission, or default of a predecessor Trustee, nor is a successor Trustee required to investigate or review any action of a predecessor Trustee. Given all of this evidence, Wendy had no basis to name Kimmel in his individual capacity, or in his capacity as a Co-Trustee. She did so in bad faith, and she persisted in the litigation against him despite efforts by Kimmel's counsel to have him dismissed from the case.

2. Kimmel's Offer of Judgment was reasonable and in good faith in both timing and amount.

Kimmel began his work as Co-Trustee of the Family Trust in January 2017. These cases initiated in August 2017. Kimmel served his Offer of Judgment on April 30, 2018, offering to take judgement against him in the amount of \$500. As set forth above, Wendy's involvement with the Co-Trustees prior to the litigation gave her full knowledge of when Kimmel became Co-Trustee as compared to when the instances of alleged breach of fiduciary duties occurred. She

1 knew that Kimmel was not involved in any of the instances of which she complained. Further,
2 she could not even identify during her deposition why she named Kimmel individually and
3 indeed, admitted that he should not be a named party in this case.

4 At the time Kimmel served his Offer of Judgment, Wendy knew he wasn't involved in
5 any breach and that she had no evidence against him, yet she rejected his Offer of Judgment. The
6 Offer was reasonable in both timing and amount. Wendy had full knowledge at that time of the
7 lack of evidence against Kimmel, yet she proceeded to litigate against him to the end of trial.
8

9 3. Wendy's decision to reject the Offer of Judgment and proceed to trial was
10 grossly unreasonable or in bad faith.

11 Given the clear state of the evidence as set forth above, Wendy's decision to reject the
12 Offer of Judgment was grossly unreasonable. As indicated above, the Nevada Supreme Court in
13 *Dillard* set forth the purpose of NRCP 68 as saving time and money for the court system, the
14 parties and the taxpayers. Wendy had no regard for Kimmel's time or the taxpayers' dollars, as
15 evidenced by her utter refusal to even seriously consider any attempt to settle this matter.
16 Accordingly, Kimmel should be rewarded for making a reasonable offer, and Wendy should bear
17 the burden of his post-Offer attorneys' fees for refusing to even consider the Offer of Judgment
18 or make any serious effort to settle.
19

20 4. The fees sought by Kimmel are reasonable and justified in amount.

21 Regarding the fourth *Beattie* factor, in determining whether the fees sought by Kimmel
22 are reasonable and justified, the proper factors the Court should consider in determining the
23 amount of an attorney's fee award include: (1) the qualities of the advocate - his ability, training,
24 education, experience, professional standing and skill; (2) the character of the work to be done -
25 its difficulty, intricacy, importance, the time and skill required, the responsibility imposed and
26

1 the prominence and character of the parties when they affect the importance of litigation; (3) the
2 work actually performed by the lawyer - the skill, time, and attention given to the work; and (4)
3 the result - whether the attorney was successful and what benefits were derived. *Brunzell v.*
4 *Golden Gate Nat'l Bank*, 85 Nev. 345, 349, 455 P.2d 31 (1969). Good judgment would dictate
5 that each of these factors be given consideration and that no one element should predominate or
6 be given undue weight. *Id.* at 349-50.

7
8 Regarding the qualifications of counsel, the undersigned's law firm as a whole has
9 received an "AV" peer rating from Martindale Hubbell. *See* Lattin Aff. Undersigned counsel,
10 Donald A. Lattin, has legal practice experience exceeding 35 years (admitted in Nevada 1981)
11 including extensive experience in complex civil litigation. He has received a personal Martindale
12 Hubbell "AV" rating, is a member of the Nevada Bar, and is admitted to practice before the
13 United States Supreme Court and various federal District Courts. *Id.* Mr. Lattin's billing rate on
14 this case of \$450 per hour which is commensurate with attorneys with his skill and expertise.
15 The rate is more than reasonable. Mr. Lattin served as lead counsel on this case and was involved
16 in all matters from discovery through trial.

17
18 Mr. LeGoy has more than 40 years of legal experience and expertise in the area of estate
19 planning. He has received a personal Martindale Hubbell "AV" rating, and is a member of the
20 Nevada and California State Bars. Mr. LeGoy's billing rate on this case of \$400 per hour is
21 commensurate with attorneys with his skill and expertise. Mr. LeGoy was involved in the
22 litigation as a resource given that he drafted the trust at issue and given his years of legal work
23 in the areas of trust and estate planning.

24
25 Mr. McQuaid has 20 years of legal experience and expertise in the area of estate planning.
26 He has received a personal Martindale Hubbell "AV" rating, and is a member of the Nevada and

1 California State Bars. Mr. McQuaid's billing rate on this case of \$350 per hour is commensurate
2 with attorneys with his skill and expertise. Mr. McQuaid was involved in the litigation as a
3 resource given that he was involved in some of the trust administration events at issue and given
4 his years of legal work in the areas of trust and estate planning.

5 Carolyn K. Renner has fourteen (14) years of experience with the litigation section of
6 Maupin, Cox & LeGoy. *See Lattin Aff.* Her billing rate of \$325 per hour on this case is more
7 than reasonable and is commensurate with her experience. *Id.* Ms. Renner's time included
8 handling discovery, motion, and pretrial work.
9

10 Kristen Matteoni is a first-year associate at Maupin, Cox & LeGoy. Ms. Matteoni
11 graduated from her law school in the top 5% of her class and began her law career as a clerk for
12 Justice Gibbons, Chief Justice at the Nevada Supreme Court. *See Lattin Aff.* Her billing rate of
13 \$200 per hour on this case is more than reasonable and is commensurate with her experience. *Id.*
14 Ms. Matteoni handled various aspects of the case including discovery, motion, and pretrial work.
15

16 Finally, the result obtained by counsel for Kimmel, *i.e.* a jury verdict in Kimmel's favor,
17 speaks for itself. This verdict was a culmination of hard work and effort on the part of the lawyers
18 involved. The amount of fees sought by Kimmel is reasonable in all respects.

19 **D. This Court may alternatively require Wendy's attorneys to pay Kimmel's costs**
20 **and attorney's fees.**

21 Nevada Revised Statute NRS 7.085 provides that if the court finds that an attorney has
22 "filed maintained or defended a civil action" and "such action or defense is not well-grounded in
23 fact," or the attorney "unreasonably and vexatiously extended a civil action," the court "shall
24 require the attorney personally to pay the additional costs, expenses and attorney's fees
25 reasonably incurred because of such conduct." Here, Wendy's attorneys sued Kimmel
26

1 individually and as Co-Trustee of the Family Trust without a reasonable basis to do so. As set
2 forth above, the information regarding Kimmel's involvement, based merely on the timing of his
3 commencement as Co-Trustee, was readily known by counsel at the initiation of the litigation.
4 There was no evidence of any wrongdoing on Kimmel's part from the very start, and as the
5 litigation progressed, no evidence was discovered to warrant maintaining the litigation against
6 Kimmel. Counsel for Kimmel attempted at various stages in the litigation to have Kimmel
7 dismissed from the lawsuit, and despite the lack of evidence, Wendy's counsel refused to dismiss
8 him. Notably, Wendy did not verify her allegations against Kimmel by signing the Counter-
9 Petition, it was signed by her attorney. When Wendy testified during her deposition that Kimmel
10 should not have been named in the lawsuit individually, her counsel did nothing to dismiss him
11 from the case. Accordingly, the Court should award Kimmel's costs and fees under this provision
12 of the Nevada statutes.
13

14 IV.

15 CONCLUSION

16
17 For reasons set forth above, based on the *Beattie* factors, Kimmel respectfully requests
18 that the Court grant an award of costs and attorney's fees to him in the amount of \$124,616.56
19 in fees, \$26,069.98 in costs for a total amount of \$150,686.54 pursuant to NRCP 68, NRS
20 18.010, NRS18.020, and in the alternative, NRS 7.085.
21

22 ///

23 ///

24 ///

25 ///

NRS 239B.030 Affirmation

Pursuant to NRS 239B.030, the undersigned hereby affirms that this document does not contain the Social Security Number of any person.

Dated this 9th day of April, 2020.

MAUPIN, COX & LEGOY

By: 

Donald A. Lattin, NSB # 693
Carolyn K. Renner, Esq., NSB #9164
4785 Caughlin Parkway
Reno, NV 89519
dlattin@mcllawfirm.com
crenner@mcllawfirm.com
Tel: (775) 827-2000
Fax: (775) 827-2185
Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of MAUPIN, COX & LeGOY, Attorneys at Law, and in such capacity and on the date indicated below I served the foregoing document(s) as follows:

Via E-Flex Electronic filing System:

Philip L. Kreitlein, Esq.
Stephen C. Moss, Esq.
Kreitlein Leeder Moss, Ltd.
1575 Delucchi Lane, Suite 101
Reno, Nevada 89502
philip@klmlawfirm.com
*Attorneys for Stan Jaksick as Co-Trustee of
the Samuel S. Jaksick, Jr. Family Trust*

Mark Connot, Esq.
Fox Rothschild LLP
1980 Festival Plaza Drive, #700
Las Vegas, NV 89135
MConnot@foxrothschild.com

And

R. Kevin Spencer, Esq. (Pro Hac Vice)
Zachary E. Johnson, Esq. (Pro Hac Vice)
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Attorneys for Wendy A. Jaksick

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

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*Attorneys for Stan Jaksick, individually, and
as beneficiary of the Samuel S. Jaksick, Jr.
Family Trust and SSJ's Issue Trust*

Via 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:

Alexi Smrt
3713 Wrexham
St. Frisco, TX 75034

Luke Jaksick
Northern Arizona University
324 E. Pine Knoll Drive #12319
Flagstaff, AZ 86011

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Benjamin Jaksick Amanda Jaksick c/o Dawn E. Jaksick 6220 Rouge Drive Reno, Nevada 89511	Regan Jaksick Sydney Jaksick Sawyer Jaksick c/o Lisa Jaksick 5235 Bellazza Ct. Reno, Nevada 89519
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Dated this 9th day of April, 2020.

Katee Allen
EMPLOYEE

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INDEX OF EXHIBITS

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Clerk of the Court
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EXHIBIT 1

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EXHIBIT 1

1 CODE: 2635
2 Donald A. Lattin, Esq., Bar No. 693
3 Carolyn K. Renner, Esq., Bar No. 9164
4 Maupin, Cox & LeGoy
5 4785 Caughlin Parkway
6 Reno, NV 89519
7 Phone: 775-827-2000
8 Fax: 775-827-2185
9 Email: crenner@mcllawfirm.com
10 Attorneys for Petitioners
11
12

13 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
14
15 IN AND FOR THE COUNTY OF WASHOE
16
17

18 In the Matter of the Administration of the

CASE NO. PR17-00445

19 SSJ'S ISSUE TRUST.
20 _____/

DEPT. NO. 15

21 In the Matter of the Administration of the

CASE NO. PR17-00446

22 SAMUEL S. JAKSICK, JR. FAMILY TRUST
23 _____/

DEPT. NO. 15

24 OFFER OF JUDGMENT

25 TO: Respondent, WENDY A. JAKSICK. ("Respondent"), and her attorney of record,
26 Mark Cannot, Esq., Fox Rothschild LLP, 1980 Festival Plaza Drive, #700, Las
Vegas, NV 89135.

27 Pursuant to Nevada Rule of Civil Procedure 68 and subsection (c)(2) thereof, Petitioner
28 MICHAEL S. KIMMEL ("Petitioner") hereby offers to have judgment taken against him and in
29 favor of Respondent in this action in the total amount of FIVE HUNDRED DOLLARS (\$500.00),
30 inclusive of costs and attorneys' fees accrued to date and any costs which may accrue from this date


1 through the date of acceptance of this Offer by Respondent.

2 This Offer of Judgment is made for the purposes specified in Rule 68 and if accepted by
3 Respondent, is not to be construed either as an admission that Petitioner is liable in this action, or
4 that Respondent has suffered any damage.

5 This Offer shall remain in effect for ten (10) days after service of this Offer upon Respondent.
6 If within ten (10) days after service of the Offer, Respondent does not, pursuant to NRCP 68(d),
7 serve written notice that this Offer is accepted, then pursuant to NRCP 68(e), it shall be considered
8 rejected by Respondent and withdrawn by Petitioner. If it is rejected, and if Respondent fails to
9 obtain a judgment more favorable than this Offer, then the Respondent shall be subject to the
10 penalties set forth in NRCP 68(f), including, but not limited to, liability for Petitioner's post-offer
11 costs and reasonable attorney's fees that are actually incurred by Petitioner from the time of this
12 Offer.
13

14 DATED this 30th day of April, 2018.

15 MAUPIN, COX & LeGOY

16
17
18 By 
19 Donald A. Lattin, Esq., NV Bar #693
20 Carolyn K. Renner, Esq., NV Bar #9164
21 4785 Caughlin Parkway
22 Reno, NV 89519
23 Telephone: (775) 827-2000
24 Facsimile: (775) 827-2185
25 Attorneys for Petitioner
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Maupin, Cox & LeGoy, Attorneys at Law, and in that capacity and on the date indicated below, I deposited for mailing from a point within the State of Nevada a sealed envelope which had enclosed within a true and correct copy of the foregoing document , which envelope had postage fully prepaid thereon, addressed as follows:

Dated this 30th day of April, 2018

Kaitlin Acunui
EMPLOYEE

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Clerk of the Court
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EXHIBIT 2

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EXHIBIT 2

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,
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; SAMMY SUPERCUB
LLC, SERIES A,

CASE NO.: PR17-00446

DEPT. NO.: 15

VERDICT

Respondents.

/ / /

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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 / / /
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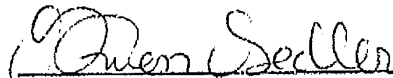
1 1. We, the jury, duly impaneled in the above-entitled
2 action, having found in favor of Petitioner, Wendy Jaksick, on
3 one or more of her claims against one or more of the
4 Respondents, find that she has proven by a preponderance of
5 evidence the amount of her damages, assess her damages to be
6 \$ 15,000.⁰⁰
7

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

(Please circle only one for each line item)

11 KEVIN RILEY	YES	<input checked="" type="radio"/> NO
12 STAN JAKSICK	YES	<input checked="" type="radio"/> NO
13 TODD JAKSICK	YES	<input checked="" type="radio"/> NO
14 MICHAEL KIMMEL	YES	<input checked="" type="radio"/> NO

15 DATED this 4 day of March, 2019.
16

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Clerk of the Court
Transaction # 7828973

EXHIBIT 3

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EXHIBIT 3

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

In the Matter of the Administration of the Case No. PR17-00445
SSJ'S ISSUE TRUST.

CONSOLIDATED
In the Matter of the Administration of the Case No. PR17-00446
SAMUEL S. JAKSICK, JR. FAMILY TRUST. Dept. No. 15

ORDER AFTER EQUITABLE TRIAL

On August 2, 2017, the trustees of the SSJ's Issue Trust ("Issue Trust") and the Samuel S. Jaksick, Jr. Family Trust ("Family Trust") filed Petitions for Confirmation of Trustee and Admission of Trust to the Jurisdiction of the Court, and for Approval of Accountings and Other Trust Administration Matters.¹ October 10, 2017, Wendy Jaksick filed an Opposition and Objection to the Petition. On January 19, 2018, Wendy filed a Counterpetition 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, which was subsequently amended on February 23, 2018. Family Trust co-trustee Stan Jaksick filed an Objection to Approval of Accountings and Other Trust Administration Matters on October 10, 2017. Todd Jaksick, as trustee of the Issue Trust

¹ Family Trust co-trustee Stan Jaksick did not join in the petitions.

1 and co-trustee of the Family Trust, and Michael Kimmel as co-trustee of the Family Trust,
2 are represented by Donald Lattin and Carolyn Renner. Todd is represented in his
3 individual capacity by Kent Robison. Mr. Robison also represents Duck Lake Ranch, LLC,
4 Incline TSS, Ltd., and Sammy Supercub, LLC. Stanley Jaksick, as co-trustee of the Family
5 Trust, is represented by Adam Hosmer-Henner and Philip Kreitlein. Wendy is
6 represented by Mark Connot and Kevin Spencer.

7 1. This Court presided over a jury trial on legal claims between February 14,
8 2019, and March 4, 2019. The jury concluded Todd breached his fiduciary duty as trustee
9 and awarded damages of \$15,000. The jury found no other trustee breached any fiduciary
10 duty. In addition, the jury found Wendy had not proven her claims for 1) civil conspiracy
11 and aiding and abetting, 2) aiding and abetting breach of fiduciary duty, or 3) fraud
12 against any counter-respondent whether individually or as trustee. The jury did not find
13 any counter-respondent acted with fraud, oppression, or malice.

14 2. On May 13, 2019, this Court began a bench trial to resolve the remaining
15 equitable claims. By stipulation, the parties submitted written closing trial statements and
16 replies. This Court authorized supplemental briefing on a narrow issue related to Exhibit
17 561. This Court has considered all briefs and evidence admitted during the equitable trial
18 (including many exhibits previously admitted at jury trial).² This Court is aware that
19 disagreements continue and Wendy alleges ongoing breaches of fiduciary duties, as
20 illustrated by the moving papers relating to post-trial costs, the 2018 annual accountings,
21 and distribution guidance. It now finds and orders as follows:

22 General Findings

23 1. As a factfinder, this Court is authorized to consider its everyday common
24 sense and judgment, and determine what inferences may be properly drawn from direct
25 and circumstantial evidence. See Lewis v. Sea Ray Boats, Inc., 119 Nev. 100, 105, 65 P.3d

26
27 ² On May 13, 2019, the parties stipulated into evidence many exhibits previously admitted during the jury
28 trial. Wendy also offered new evidence during the equitable phase of trial. A list of all documentary
evidence admitted on equitable issues is contained in this Court's Order Addressing Evidence at Equitable
Trial, dated May 20, 2019. This Court has not considered unadmitted documentary evidence. However, this
Court has considered deposition testimony properly part of the trial record pursuant to NRCP 32.

1 245, 248 (2003); Nev. 1GI.5 (2011); Nev. 2EV.3 (2011); Nev. J.I. 1.05 (1986).

2 2. The facts presented in support of the equitable claims inextricably overlap
3 with the legal claims presented to the jury. Despite how the claims are pled, Wendy is
4 attempting to retry her case to obtain a second review of similar facts and an outcome
5 different from the jury verdict.³ This Court may or may not have reached the same
6 decision as the jury. Regardless, it has no authority to dilute or otherwise modify the
7 jury's verdict.

8 3. The file materials compose more than 17,000 pages. There were more than
9 300 separate pleadings, motions, oppositions, replies, joinders, and other substantive
10 papers filed in this proceeding. The parties produced tens of thousands of documents
11 before trial and marked 677 exhibits for the two trials, of which 227 were admitted. The
12 substantive papers (with exhibits and transcripts) filed since the jury's verdict compose
13 more than 4,000 pages. This Court has read and re-read the pending moving papers, to
14 include exhibits and transcripts. It has analyzed every argument presented and carefully
15 studied the cited authorities. It cannot synthesize the competing moving papers, exhibits,
16 and arguments into a single coherent order. It cannot resolve the arguments in minutia.
17 Therefore, this Court elects to make general findings, which are substantially supported by
18 the evidence of record.

19 4. This Court regrets some of its more direct findings, which it must disclose to
20 support its discretionary resolution of equitable claims.

21 5. Sam Jaksick created substantial wealth during his life but his leveraged
22 estate was compromised by the "great recession" during the last season of his life. Sam's
23 estate is exceedingly complex because he used tens of different corporate entities as
24 holding companies for his wealth. Sam also partnered with non-family business entities.

25 6. Sam had three children: Stan, Wendy, and Todd. Sam loved each of his

26
27 ³ On January 3, 2018, Wendy demanded a jury trial on all legal claims. Wendy demanded a jury – at least in
28 part – because she likely suspected a judge's comprehensive, studious examination of all evidence would not
result in the \$80 million compensatory damages and additional punitive damages she asked the jury to
award. This Court honors Wendy's unfettered constitutional right to a jury trial but it will not re-visit the
identical facts to arrive at a different outcome for Wendy.

1 children, despite their different strengths, weaknesses, and personalities. Wendy did not
2 transition well into adulthood and Sam was aware of her inability to provide for herself.
3 Wendy does not understand financial complexities. Sam was more confident in Stan and
4 Todd as he worked with them during his life and designated them to continue
5 participating in his estate and business affairs after his death. Stan's trial participation was
6 not lengthy but he appears to enjoy some financial fluency and business sophistication.
7 Stan also presented as a credible witness and thoughtful sibling. While Todd is most
8 familiar with Sam's business and trust affairs, he is only marginally sophisticated as a
9 trustee. He regularly deferred to the knowledge and expertise of others.⁴ Todd also
10 presented as conflicted by his own interests, influenced by his animus towards Wendy,
11 and confused about his duties as a neutral trustee.

12 7. Sam's estate plan evolved over the years, and its last iteration was influenced
13 by debt, tax avoidance, asset protection, and planning around Stan's divorce. Both Sam
14 and Todd were exposed to personal liabilities on substantial debts Sam had incurred.
15 Some of the estate documents were created in haste because of Sam's heart illness and
16 surgery in December, 2012. (Sam survived his heart illness and tragically died in a water
17 accident in 2013). Some of the 2012-13 estate planning documents are disorganized,
18 internally inconsistent, and complicated by notarial mischief or neglect. This Court was
19 particularly troubled by the notary's abdication of statutory responsibilities, which was an
20 influencing fact in the litigation Wendy pursued. Notaries are given great authority and
21 their actions induce reliance. The notary at issue fell below the statutory standards. This
22 finding alone warrants a substantial financial consequence upon the trust, which this
23 Court includes in its analysis of the no-contest penalty and attorneys' fees requests.

24 8. Todd's participation in Sam's estate beginning in 2012 can be viewed
25 through two opposing lenses: he was either a disconnected participant who yielded to his
26

27 ⁴ This Court understands jury instruction no. 11, which does not alter the fact that Todd struggled under the
28 shadow of his father's business acumen. The dynamic of Todd relying on professionals regarding the
accountings, while the professionals provided accountings with disclaimers and hyphens, created
uncertainty (or at least the appearance of uncertainty) about transactions, values, and who was ultimately
responsible for acts and accountings of trust administration.

1 father's wishes, or he was a subtly strategic participant who enriched himself to the
2 detriment of his siblings. These opposing possibilities are relevant only to understand
3 how this dispute became so bitter. This Court is inclined to find Todd was the former
4 rather than the latter, but regardless, Stan and Wendy had cause to seek answers to
5 questions created by document anomalies, inadequate disclosures, and transactions
6 inuring to Todd's benefit.

7 9. This action began when Stan, Wendy, and Todd were opposed to each other.
8 The dispute was exacerbated by inadequate information and self-interested perspectives.
9 Some of the more personal allegations among siblings reveal a family influenced by
10 misperceptions and individual interests. Wendy was particularly personal in her
11 allegations, the worst of which were harassing, vexatious, and without factual basis. There
12 were at least seven lawyers zealously advocating for their clients, which further
13 entrenched the siblings against each other. The children chose litigation over compromise
14 to work through the complexities of Sam's estate and their disparate financial
15 circumstances. With more effortful disclosures, neutral access to information, and a little
16 sibling patience, they *might* have worked through the messiness of Sam's estate to reach a
17 non-litigation resolution. Instead, the children sued each other, with Todd and Stan
18 settling their dispute just days before the jury trial began. Despite the settlement, this
19 Court is aware of the allegations Stan made against Todd in his deposition and trial
20 testimony. The settlement does not extinguish Stan's pleading allegations and
21 testimony — it merely reflects Todd and Stan's strategic and well-advised decision to
22 compromise their claims before trial. The settlement worked to Wendy's trial detriment,
23 yet she chose trial over settlement and must now accept the consequences of her choice.
24 Stan's allegations and testimony are relevant to contextualize the legal and equitable
25 claims, particularly the request to impose a no-contest penalty and for attorneys' fees
26 under NRS Chapter 18 and NRCP 68.

27 10. Todd and Stan contend they made every effort to avoid litigation but could
28 not persuade Wendy or her attorneys to choose compromise over conflict. This is mostly

1 accurate, as Wendy's litigation position and trial demand were influenced more by animus
2 and avarice than by a desire for balanced justice. In particular, Wendy's \$80 million jury
3 demand revealed her overreach. However, Wendy's litigation zeal does not extinguish
4 her probable cause to seek answers and formulate claims based upon the information she
5 had at the time — the same information that led to Stan's allegations against Todd.

6 11. Throughout trial this Court reflected upon how Sam would respond if he
7 observed his children spending millions of dollars litigating his estate. The parties
8 repeatedly invited this Court to consider Sam's testamentary intentions. Responding to
9 that invitation, this Court has wondered how Sam would react to see his estate
10 disproportionately allocated among his children. There is no way to know how or if Sam
11 would have enlarged Wendy's beneficial interests if he survived the economic recovery.
12 Sam loved Wendy despite her issues, and this Court suspects Sam would have continued
13 his pattern of lifetime largesse in favor of his troubled daughter. But suspicion and
14 speculation are beyond this Court's authority. Death arrives at its own inconvenient time
15 and none can alter its consequences. Wendy is simply without her paternal benefactor and
16 is susceptible to the trustees' actions as governed by documents and transactions Sam
17 approved during his life.

18 12. The trustees' initial petitions were predicated upon accountings that
19 provided inadequate information. The accountings were untimely, and even if technically
20 compliant with the statutes, they failed to provide full and fair notice to Wendy as a
21 beneficiary. This Court acknowledges the trustees attempted to answer Wendy's
22 questions by making their CPA and lawyers available to Wendy, but there is only
23 marginal evidence in the record the trustees invested their own personal efforts to satisfy
24 Wendy's concerns. At some point the trustees' responses became form over function.
25 Todd particularly grew weary of Wendy, which affected his neutral trusteeship, as
26 illustrated by his hope to satisfy Wendy's beneficial interests at a discount that inured to
27 his benefit. In response, Wendy initiated scorched-earth litigation grounded in
28 entitlement and limited self-awareness. This Court cannot now alter the consequences of

1 the trust administration and litigation choices that precede this order.

2 13. Wendy's legal and equitable claims are grounded in the same common facts
3 and are exceedingly difficult to segregate. As this Court reviewed the hundreds of pages
4 of written arguments relating to the equitable claims, it was taken back to the evidence
5 and arguments presented to the jury. Through the misty fog of painfully voluminous
6 allegations and varied claims, the core of Wendy's complaint is that Todd breached his
7 fiduciary duties by self-dealing and failing to disclose information relevant to Wendy as a
8 beneficiary. No matter how Wendy frames or argues her equitable claims, she asks this
9 Court to remedy the identical facts and transactions she placed before the jury. This Court
10 must look to the substance of the claims, not just the labels used in the pleading document.
11 Nev. Power Co. v. District Court, 120 Nev. 948, 960; 102 P.3d 578, 586 (2004).

12 14. The complexity of Sam's estate warranted extraordinary disclosures,
13 explanations, and compliance with discovery rules. There were significant discovery
14 disputes, such that this Court created a schedule for recurring access to the Discovery
15 Commissioner. This Court also ordered the production of disputed discovery. Discovery
16 continued to the very eve of trial and Wendy was still attempting to discern her beneficial
17 interests when trial began.

18 15. There were several sports references and metaphors argued to the jury.
19 Consistent with that theme, Wendy "swung for the fences" when she asked the jury to
20 award \$80 million to her (plus punitive damages), an amount that exceeds the evidentiary
21 value of this estate and would deprive Todd and Stan of any beneficial interests. She now
22 seeks a "mulligan" by re-arguing to this Court what was over-argued to the jury.⁵ The
23 jury found that Todd breached his fiduciary duties but only awarded \$15,000 to Wendy. It
24 found against Wendy on all other claims and against all other counter-respondents. This
25 Court may have been authorized to award additional equitable relief upon the same facts
26

27 ⁵ To illustrate, Wendy argued in her omnibus opposition to the cost memoranda filed before the equitable
28 claims trial that "damages may still be awarded, transactions may be set-aside, further breaches of fiduciary
duty may be found, and the ACPAs and other documents may be found fraudulent or invalid, ab initio."
These were all claims and requests rejected by the jury.

1 if the jury found for Wendy on more claims and against more counter-respondents. But
2 constitutional and decisional authorities prevent this Court from entering a subsequent
3 order diluting or altering the jury's verdict.

4 16. Todd asks this Court to contextualize the \$15,000 as a *de minimis* award. This
5 Court will not infuse qualitative meaning into the jury's verdict. To do so would be
6 impermissible speculation. Todd breached his fiduciary duties to Wendy. And Wendy
7 was not awarded the damages she sought. These two facts are integral to this Court's
8 resolution of equitable claims and fees requests.

9 General Legal References

10 1. This Court cannot supplant or alter a jury's verdict by relying upon common
11 facts to reach a different outcome. See generally Lehrer McGovern Bovis, Inc. v. Bullock
12 Insulation, Inc., 124 Nev. 1102, 197 P.3d 1032, 1038 (2008) (discussing special interrogatory
13 verdicts). In Acosta v. City of Costa Mesa, 718 F.3d 800 (9th Cir. 2013), the plaintiff
14 submitted his equitable claim for declaratory relief to the bench after the jury rejected his
15 legal claims. The court held "it would be a violation of the Seventh Amendment right to
16 jury trial for the court to disregard a jury's findings of fact. Thus, in a case where legal
17 claims are tried by a jury and equitable claims are tried by a judge, and the claims are
18 based on the same facts, in deciding the equitable claims, the Seventh Amendment
19 requires the trial judge to follow the jury's implicit or explicit factual determinations." Id.
20 at 828-29 (citations omitted).

21 2. In Sturgis Motorcycle Rally, Inc. v. Rushmore Photo & Gifts, Inc., 908 F.3d
22 313, 343 (8th Cir. 2018), the jury found for the plaintiff on legal intellectual property claims,
23 but the bench subsequently applied the equitable defenses of laches and acquiescence.
24 The appellate court reversed, holding "[t]o bind the district court's equitable powers, a
25 jury's findings must be on an issue 'common' to the action's legal and equitable claims;
26 otherwise, the court is free to treat the jury's findings as 'merely advisory'" Id.
27 Further, "[i]f the jury's findings were on a common issue, the court, in fashioning equitable
28 relief, may take into account facts that were not determined by the jury, but it may not

1 base its decision on factual findings that conflict with the jury's findings." Id. at 344
2 (citations omitted); see also Haynes Trane Serv. Agency, Inc. v. Am. Standard, Inc., 573
3 F.3d 947, 959 (10th Cir. 2009) (noting a court cannot grant equitable relief on facts rejected
4 explicitly or implicitly by a jury verdict); Avitia v. Metro Club of Chicago, Inc., 49 F.3d
5 1219, 1231 (7th Cir. 1995) ("[A] judge who makes equitable determinations in a case in
6 which the plaintiff's legal claims have been tried to a jury is bound by any factual findings
7 made or inescapably implied by the jury's verdict.").

8 3. Among prescribed form and content, an accounting must provide a
9 beneficiary with the ability to evaluate his or her interests. NRS 165.135(3). See also NRS
10 153.041. The cost of preparing an accounting is presumptively borne by the trust. NRS
11 165.1214(5). Unless acting in good faith, a trustee can be personally liable for failing to
12 provide an accounting. NRS 165.148. A beneficiary may petition the court to order a
13 trustee to perform his or her accounting duties. NRS 165.190. This Court may order a
14 trustee's compensation be reduced or forfeited, or enter other civil penalty, when a trustee
15 fails to perform his duties. NRS 165.200.

16 4. The trustees' just and reasonable expenses are presumptively governed by
17 the trust instruments and borne by the trust. However, this Court has authority to review
18 and settle the trustees' expenses and compensation. NRS 153.070. This Court may also
19 reduce a trustee's compensation or order a trustee to pay a beneficiary's reasonable
20 attorneys' fees and costs when the beneficiary compels redress for a breach of trust or
21 compliance with trust terms. NRS 153.031(3). See also In re Estate of Anderson, No.
22 58227, 2012 WL4846488 (Oct. 9, 2012). This Court may order the trust expenses defending
23 against a beneficiary's successful claims be borne by a trustee individually. NRS 18.090.
24 See also Estate of Bowlds, 120 Nev. 990, 1,000, 102 P.3d 593, 600 (2004) (concluding
25 payment of attorney's fees from trust assets only when litigation generally benefits the
26 trust); NRS 153.031(3)(b) (stating if court grants relief to petitioner, it may order trustee to
27 pay fees and costs); RESTATEMENT (THIRD) OF TRUSTS § 100 (2012) (examining denial of
28 compensation to breaching trustee).

1 5. NRS 163.00195 governs no-contest provisions. It begins by emphasizing this
2 Court's duty to enforce no-contest clauses to effectuate a settlor's intent. NRS 163.00195(1).
3 However, the statute then creates a wide exception when it provides a no-contest clause
4 must not be enforced when a beneficiary acts to enforce her legal rights, obtain court
5 instruction regarding proper administration, seeks to enforce the trustee's fiduciary duties,
6 or institutes and maintains a legal action in good faith and based on probable cause. NRS
7 163.00195(4). See also Matter of ATS 1998 Tr., No. 68748, 2017 WL3222533, at *4 ("[T]he
8 purpose of a no-contest clause is to enforce the settlor(s)' wishes, not to discourage a
9 beneficiary from seeking his or her rights."). A legal action is based on probable cause
10 when the facts and circumstances *available to the beneficiary*, or a properly informed and
11 advised reasonable person, "would conclude that the trust, the transfer of property into
12 the trust, any document referenced in or affected by the trust or any other trust-related
13 instrument is invalid." NRS 163.00195(4)(e) (emphasis added).

14 6. A trustee has a duty to act impartially, based on what is fair and reasonable
15 to all beneficiaries. Specifically, "the trustee shall act impartially in investing and
16 managing the trust property, taking into account any differing interests of the
17 beneficiaries." NRS 164.720(1). "[I]t is the trustee's duty, reasonably and without personal
18 bias, to seek to ascertain and to give effect to the rights and priorities of the various
19 beneficiaries or purposes as expressed or implied by the terms of the trust." RESTATEMENT
20 (THIRD) OF TRUSTS § 79 (2007).

21 7. "In all matters connected with [the] trust, a trustee is bound to act in the
22 highest good faith toward all beneficiaries and may not obtain any advantage over the
23 latter by the slightest misrepresentation, concealment, threat, or adverse pressure of any
24 kind." Charleson v. Hardesty, 108 Nev. 878, 882, 839 P.2d 1303, 1306 (1992) (quoting
25 Morales v. Field, 160 Cal.Rptr. 239, 244 (1980)).

26 8. This Court may remove a trustee for good cause, including breach of
27 fiduciary duties. NRS 156.070; NRS 163.115; NRS 163.190; NRS 163.180; NRS 164.040(2);
28 see also Diotallevi v. Sierra Dev. Co., 95 Nev. 164, 591 P.2d 270 (1979) (explaining court has

1 "full equitable powers" to redress breach of trust). Removal may be appropriate when
2 there is significant animosity between the trustee and a beneficiary, such that it has the
3 potential to materially interfere with the proper administration of the trust. Acorn v.
4 Monecchi, 386 P.3d 739, 760 (Wyo. 2016) (explaining the relevant question is whether
5 "hostility, in combination with existing circumstances, materially interferes with the
6 administration of the trust or is likely to cause that result"); In re Estate of Stuchlik, 857
7 N.W.2d 57, 70 (Neb. 2014) (stating a trustee cannot act impartially when "influenced by . . .
8 animosity toward individual beneficiaries"); BOGERT, LAW OF TRUSTS AND TRUSTEES § 129
9 (3d rev. ed. 2019) (explaining where there is potential for a conflict of interest to arise from
10 the dual status of a trustee who is also a beneficiary, removal of the trustee may be
11 appropriate); see also Dennis v. R.I. Hosp. Trust Nat. Bank, 571 F. Supp. 623, 639 (D.R.I.
12 1983) (discussing removal may be appropriate when the court could expect "that future
13 Trust transactions will be scrutinized by the beneficiaries" as a result of lengthy and
14 antagonistic litigation). Additionally, conflict between the trustee and beneficiary may
15 form a basis for removal when personal contact or collaboration is required for the
16 administration of the trust. Blumenstiel v. Morris, 180 S.W.2d 107, 109 (Ark. 1944). "The
17 purpose of removing a trustee is not to inflict a penalty for past action, but to preserve
18 trust assets." Getty v. Getty, 205 Cal.App.3d 134, 140 (1988).

19 9. Attorney's fees are not allowed to a prevailing party absent a contract,
20 statute, or rule to the contrary. See Smith v. Crown Fin. Servs., 111 Nev. 277, 890 P.2d 769
21 (1995) (analyzing the American and English rules regarding attorney's fees and their
22 intersection with Nevada Law). NRS 18.010(2)(b) provides that this Court may award
23 attorney's fees when it finds a claim was brought or maintained without reasonable
24 ground, or to harass the prevailing party. Pursuant to NRCP 68(a), "[a]t any time more
25 than 21 days before trial, any party may serve an offer in writing to allow judgment to be
26 taken in accordance with its terms and conditions." If an offer is not accepted within the
27 prescribed time period, it will be considered rejected by the offeree. NRCP 68(e). If an
28 offeree rejects an offer and fails to obtain a more favorable judgment, "the offeree must

1 pay the offeror's post-offer costs and expenses, including . . . reasonable attorney fees, if
2 any be allowed, actually incurred by the offeror from the time of the offer." NRCP
3 68(f)(1)(B) (emphasis added).

4 10. "[T]he purpose of NRCP 68 is to encourage settlement . . . not to force
5 plaintiffs unfairly to forego legitimate claims." Beattie v. Thomas, 99 Nev. 579, 588, 668
6 P.2d 268, 274 (1983). To determine whether an award of fees is appropriate, a court must
7 consider and weigh the following factors: (1) whether the claim was brought in good faith;
8 (2) whether the offer of judgment was reasonable and in good faith in both its timing and
9 amount; (3) whether the decision to reject the offer and proceed to trial was grossly
10 unreasonable or in bad faith; and (4) whether the fees sought by the offeror are reasonable
11 and justified in amount.⁶ Beattie, 99 Nev. at 588-89, 668 P.2d at 274. No one Beattie factor
12 is outcome determinative, and each should be given appropriate consideration. Yamaha
13 Motor Co., USA v. Arnoult, 114 Nev. 233, 252 n.16, 955 P.2d 661, 673 n.16 (1998).

14 11. A proceeding concerning a trust "does not result in continuing supervisory
15 proceedings, and the administration of the trust must proceed expeditiously in a manner
16 consistent with the terms of the trust, without judicial intervention or the order, approval
17 or other action of any court, unless the jurisdiction of the court is [properly] invoked . . . as
18 provided by other law." NRS 164.015(7).

19 Equitable Issues

20 The following equitable issues and arguments are before this Court:

21 1. Approval of accountings

22 The trustees ask this Court to settle, allow, and approve the Issue and Family Trust
23 accountings without further examination, to include approval of trustees' fees, attorneys'
24

25 ⁶ When considering the fourth Beattie factor, the court must consider the Brunzell factors. See Shuette v.
26 Beazer Homes Holdings Corp., 121 Nev. 837, 864-65, 124 P.3d 530, 548-49 (2005). These factors include the
27 following: "(1) the qualities of the advocate: his or her ability, training, education, experience, professional
28 standing, and skill; (2) the character of the work to be done: its difficulty, intricacy, importance, time and
skill required, the responsibility imposed and the prominence and character of the parties where they affect
the importance of litigation; (3) the work actually performed by the lawyer: the skill, time, and attention
given to the work; and (4) the result: whether the attorney was successful and what benefits were derived."
Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

1 fees, and payment of other professional fees and administrative expenses.⁷ Wendy
2 opposes and asks this Court to order the trustees to prepare statutory compliant
3 accountings that disclose assets, values, transactions, and other acts of trust
4 administration. Wendy further argues that if the amended accountings are untimely or
5 noncompliant, this Court should find and remedy the trustees' breach of fiduciary duties.

6 The timing and form of accountings are prescribed by statute. But an accounting is
7 more than a formulaic compilation of data. An accounting is given to provide notice. Just
8 as facts in controversy vary from case to case, an accounting must be adjusted as the trust
9 estate requires. The trusts before this Court are complex because of the multiple layers of
10 entity and fractional ownership. They are further complicated by fluid and often
11 unknown values. This Court generally agrees with Wendy that the accountings fail to
12 provide adequate notice because they reveal only a portion of Sam's complex affairs—they
13 are mere pieces in a much larger puzzle and are ineffective when only reviewed in
14 isolation.⁸ Instead, the accountings created confusion and engendered suspicion. The
15 trustees attempted to answer Wendy's questions informally and made their professionals
16 available to answer Wendy's questions. But the accountings should have included more
17 explanatory details. The best example of how the accountings failed to provide actual and
18 adequate notice occurred when Todd testified Wendy could expect to receive \$4 million
19 from a variety of sources. While the trustees may have provided explanations through
20 accountants and settlement offers, Wendy's beneficial expectancy is not apparent from the
21 accountings or evidence of the trustees' pre-trial explanations.

22 However, this Court also notes that Wendy's complaints about the content and
23 general timing of the accountings were presented to the jury in the legal phase of trial and
24 are therefore facts common to the equitable claims. The jury presumably considered all
25 evidence when deliberating its verdict. The verdict is an express or implicit rejection of

26
27 ⁷ The relevant accountings are for the Issue and Family Trusts (April, 2013 through December, 2017) and
Wendy's subtrust (2013 – 2016).

28 ⁸ Wendy argues: "While in some circumstances, preparing and delivering accountings in the format
provided by NRS 165.135 may fully satisfy a fiduciary's requirement to account and fully disclose, that is not
and cannot be the case for these very complex trusts."

1 Wendy's complaints about the accountings. Accordingly, this Court will not provide
2 equitable relief regarding the accountings, which were constructively approved and
3 confirmed by the jury's verdict. In so doing, this Court does not countenance the trustees'
4 arguments that all accountings and disclosures complied with Nevada law, to include
5 NRS 165.135(4)(a), which allows for a statement prepared by a CPA containing summaries
6 of the information required by NRS 165.135(1). This Court simply orders that all litigation
7 regarding the accountings in existence at the time of the jury trial must end.⁹ The nature of
8 the accountings influence this Court's decision regarding attorneys' fees and the no-
9 contest provisions of the trust.

10 2. *Validity of the Agreements and Consents to Proposed Actions (ACPAs) and*
11 *Indemnification Agreements*

12 Todd as trustee of the Issue Trust, and Todd and Michael Kimmel as co-trustees of
13 the Family Trust, ask this Court to ratify and approve the ACPAs, thus relieving them of
14 liability for actions reasonably taken in reliance upon them. They (and Todd individually)
15 also ask this Court to affirm the indemnification agreements. Wendy opposes and asks
16 this Court to invalidate the ACPAs and rescind any transactions accomplished through
17 them. She also contests Stan and Todd's indemnification agreements and asks that any
18 transactions accomplished through them be invalidated and set aside. Each party presents
19 substantial arguments supporting their respective positions. This Court again returns to
20 the scope and content of the jury trial and the facts common to legal and equitable claims.
21 While the attorneys argued to the jury that this Court would decide the validity of the
22 ACPAs and indemnification agreements, each of the challenged documents and related
23 transactions were thoroughly presented and argued to the jury – including document
24 preparation, execution, and other formation irregularities. Thus, at least, the jury verdict is
25 an implicit rejection of Wendy's arguments.

26 Having considered all arguments, this Court concludes it will neither affirm nor

27
28 ⁹ The trustees may wish to modify the form of future accountings to provide better notice and explanations
to the beneficiaries. Otherwise, they risk objections this Court may be inclined to grant, including an award
of attorney's fees.

1 reject the ACPAs and indemnification agreements. They cannot be segregated from the
2 legal claims presented to the jury and now subsequently argued in support of equitable
3 relief. The jury constructively approved and affirmed the ACPAs and indemnification
4 agreements when it reached its verdict. The verdict prevents additional litigation and
5 precludes liability exposure for actions taken in reliance upon these documents. All claims
6 involving the disputed ACPAs and indemnification agreements shall end with the jury's
7 verdict. Nonetheless, the ACPAs and indemnification agreements also influence this
8 Court's decision regarding attorneys' fees and the no-contest provisions.

9 3. *Violation of the no-contest provisions of the trusts*

10 All trustees except Stan ask this Court to declare that Wendy violated the no-contest
11 provisions of the trusts when she initiated and maintained this litigation. Wendy opposes
12 and asks this Court to declare that Todd violated the no-contest provisions when he filed
13 the initial petition and later moved to dismiss her litigation. The trustees' request deserves
14 analysis, whereas Wendy's request is retaliatory and made with little legal basis or
15 support from the trust instruments.

16 Wendy sought to enforce her rights, obtain instructions, and remedy a breach of
17 fiduciary duties. The jury agreed that Todd breached his fiduciary duties. Further, based
18 upon the information she possessed, she had probable cause to seek invalidation of
19 transfers and other acts of trust administration. This Court must distinguish between the
20 *existence* of probable cause for initiating and maintaining this action with the manner in
21 which the probable cause was *litigated*. As noted elsewhere, Wendy and Stan had
22 probable cause to seek answers to questions raised by the accountings and other events of
23 trust administration. Thus, while Wendy's litigation zeal and overreaching jury demand
24 may implicate Sam's intention to disincentivize litigation, Wendy's legal actions were
25 authorized and do not create a bar to her beneficial rights.

26 4. *Unjust enrichment and constructive trust*

27 Wendy asks this Court to impress a constructive trust to cure unjust enrichment
28 caused by fraud, breach of fiduciary duty, and self-dealing. Todd, Stan, and the trustees

1 make several arguments in opposition to Wendy's request. This Court disagrees with
2 Wendy's position. Wendy's allegations of misconduct, document impropriety, and self-
3 dealing underlying her request for equitable relief are inseparable from the legal claims
4 she presented to the jury. Wendy has been awarded damages for Todd's breach of
5 fiduciary duties. Any other equitable relief would constitute double recovery and alter the
6 jury's verdict in violation of the Seventh Amendment and its interpretative decisions.

- 7 5. *Removal of trustees*
8 *Disgorgement of trustee fees*
9 *Use of trust funds to initiate petition and defend against Wendy's counterpetition*
 Award of attorneys' fees

10 Wendy relies upon her same arguments when asking this Court to remove the
11 trustees, order the trustees to disgorge trustee fees, and deny the use of trust funds to
12 present their petitions and defend against her counterpetition. The parties present
13 substantial authorities and arguments (and other moving papers) relating to attorneys'
14 fees.

15 There is no basis to consider the removal of any trustee except Todd. The two bases
16 to remove Todd are 1) the jury's verdict that Todd breached his fiduciary duties, and 2)
17 this Court's observation that Todd's neutrality is conflicted by his own interests and
18 animus towards Wendy. This Court concludes removal would be unjust and
19 incommensurate for several reasons: 1) Todd is Sam's designated and preferred trustee, 2)
20 other trustees will diffuse Todd's conflicts and reduce the personal contact between Todd
21 and Wendy, 3) the remedy against Todd's breaches and conflicts are made through other
22 orders regarding attorneys' fees, disgorgement of trustee's fees, and inapplicability of the
23 no-contest provisions, 4) Todd's own affairs are inseparable from trust administration and
24 his removal as trustee will not sever him from trust business; he will remain involved in
25 Jaksick family affairs through his ongoing management and ownership of several other
26 related entities, 5) the expenses of removing Todd and educating a successor trustee
27 would be expensive and inefficient, and 6) Wendy's suggestion that a commercial trustee
28 serve as successor trustee for all trustees is neither warranted nor workable.

 However, based upon the jury's verdict that Todd breached his fiduciary duties

1 (and secondarily, this Court's findings about the timing and content of the accountings),
2 this Court grants Wendy's request that Todd disgorge or disclaim all trustee's fees from
3 the inception of his trusteeship through the date when final judgment is entered. The
4 amount disgorged or otherwise forfeited may serve as an offset against the 25% of
5 trustees' attorneys' fees Todd is ordered to pay, as set forth below. This Court confirms
6 trustee fees to all other trustees.

7 There are several requests regarding attorney's fees as a trust expense. This Court's
8 discretionary resolution of the fees requests is bound by all facts of record and influenced
9 by the entirety of the pre-trial, legal, and equitable proceedings (including the settlement
10 agreement between Todd and Stan) and uncertainties created by notarial malfeasance.

11 This Court first orders that Stan Jaksick and Michael Kimmel's attorneys' fees be
12 chargeable to the trust and paid from trust corpus. This Court's decision regarding
13 Wendy and Todd's fees (both as trustee and individually) are more complicated. There
14 are competing facts and legal principles, which this Court analyzes in the aggregate and
15 not in isolation. In particular, the NRCP 68 request cannot be considered narrowly, but
16 instead, must be viewed by a totality of the case proceedings and statutory authorities
17 governing trustees. There are several options before this Court:

- 18 - Order the trust to pay all, some, or none of Wendy's fees
19 because she successfully obtained a verdict that Todd breached
20 his fiduciary duties as trustee.
- 21 - Order the trust to pay all, some, or none of the fees Todd
22 incurred as trustee because, even though he breached his
23 fiduciary duties, he qualitatively and quantitatively prevailed
24 against other claims asserted by Wendy.
- 25 - Order Wendy to pay fees Todd incurred because she brought
26 or maintained her action without reasonable grounds or to
27 harass.
- 28 - Order Wendy to pay fees Todd incurred as trustee of the Issue
Trust because she rejected his \$25,000 offer of judgment.
- Order Wendy to pay fees Todd incurred individually because

1 she rejected his \$25,000 offer of judgment.

2 Discretionarily decline to order Wendy to pay fees pursuant to
3 the offers of judgment.

4 On August 29, 2018, Todd offered Wendy to have judgment entered against him
5 individually in the amount of \$25,000. He also offered Wendy to have judgment entered
6 against him as trustee of the Issue Trust in the amount of \$25,000. The jury did not make
7 any adverse findings against Todd individually, but it concluded Todd breached his
8 fiduciary duties as trustee and awarded \$15,000 to Wendy. With adjustments for interest,
9 the amount Wendy will receive is almost indistinguishable from the \$25,000 Todd offered
10 as trustee. To the extent there is a *de minimis* distinction, the difference is not enough in a
11 dispute that incurred several million dollars of fees and involved tens of millions in
12 controversy.

13 An offer of judgment must be an authentic attempt to settle a dispute. The offer of
14 judgment benefit is not automatically conferred. Instead, this Court must carefully
15 analyze the offer and discretionarily apply it to the unique facts of each case. This Court
16 and counsel are familiar with the American Rule of attorneys' fees and discretionary
17 application of NRCP 68. This Court's discretion exists to encourage parties to convey
18 legitimate offers to resolve their disputes. Of course, judicial discretion is controversial to
19 those who are aggrieved, and it is unpredictable to all.

20 On one side, offers that are appropriate in time and amount will cause the non-
21 offering party to become realistic and engage in genuine risk/benefit analyses. These
22 offers shift a calculated risk as trial approaches. To be an effective mechanism to resolve
23 disputes before trial, they should be in an amount the non-offering party cannot decline in
24 good faith. Defendants who perceive no liability exposure chafe against making time- and
25 amount-appropriate offers because they resent the payment of any money to a party they
26 perceive will not prevail at trial. On the other side, offering parties sometimes make time-
27 and amount-inappropriate offers *they expect to be rejected*. These offers do not facilitate
28 settlement--they are strategic devices to shift the risk of fees by offering illusory

1 consideration to end litigation.

2 This Court's discretion is guided by the unique facts and procedural history of this
3 case. This Court analyzes the Beattie factors as follows:

4 *Whether Wendy's claims were brought in good faith?* Wendy believed in good faith that
5 she suffered damages from Todd's individual and fiduciary misconduct. She trusted the
6 court system and exercised her constitutional right to jury trial. This Court concludes that
7 Wendy's claims against Todd as trustee of the Issue Trust were brought in good faith.
8 Wendy's concerns are countenanced, in large part, by the questions raised by the
9 accountings, Stan's separate allegations against Todd, document anomalies, and the optics
10 of Todd's disproportionate benefit from Sam's business and trust affairs. The good-faith
11 nature of Wendy's claims against Todd individually are more difficult to discern. In the
12 final analysis, Wendy had some cause to initiate the claims against Todd individually, but
13 as discovery progressed, Wendy's cause to pursue Todd individually diminished. This
14 factor weighs slightly in Wendy's favor regarding the Issue Trust offer of judgment and is
15 neutral regarding Todd's individual offer of judgment.¹⁰

16 *Whether Todd's offers were reasonable and in good faith in both timing and amount?* This
17 Court has wrestled with the question of whether the offers of judgment were brought in
18 good faith in both timing and amount. These offers of judgment were made six months
19 after Wendy filed her amended counter-petition, when discovery was still in its infancy.
20 This Court concludes the amounts offered were neither good faith/reasonable nor
21 strategic bad faith/unreasonable. They fall within the continuum between those two
22 categories. Todd knew, or should have known, the fees incurred through continuing
23 litigation alone would substantially overshadow the offered amounts. Todd knew, or
24 should have known, that Wendy would never accept \$25,000 to resolve her claims against
25 him as trustee of the Issue Trust.

26 However, Todd also had cause to believe he would prevail at trial, a fact now
27

28 ¹⁰ Because this Court finds Wendy brought her claims in good faith, this Court concludes fees under NRS
18.010(2)(b) are not warranted.

1 proven with respect to the claims against him individually. Todd's subjective belief about
2 the strength of his position is legally relevant. "[W]here the offeror has a reasonable basis
3 to believe that exposure to liability is minimal, a nominal offer is appropriate." Arrowood
4 Indem. Co. v. Acosta, Inc., 58 So. 3d 286, 289 (Fla. Dist. Ct. App. 2011) (discussing the good
5 faith prong of an offer of judgment from a Florida statute analogous to NRCP 68). At the
6 time Todd made his individual offer, Wendy had been unable to present coherent facts
7 underlying her claims against him personally. He therefore had reason to believe
8 Wendy's claims against him individually were weak or lacked merit. See Beach, 958 F.
9 Supp. at 1171 (holding defendant's offer was reasonable even though plaintiff's alleged
10 damages exceeded the offer's amount "given the weaknesses defendant perceived in
11 plaintiff's case."); see also Scott-Hop v. Bassek, Nos. 60501, 61943, 2014 WL 859181 at *6
12 (Feb. 28, 2014) (holding reasonable an offer of \$25,000 even though plaintiff's alleged
13 medical expenses were over \$150,000 because of the uncertainty of plaintiff's case and
14 defendant's summary judgment motion); Max Bear Productions, Ltd. v. Riverwood
15 Partners, LLC, No. 3:09-CV-00512-RCJ-RAM, 2012 WL 5944767 (D. Nev. Nov. 26, 2012)
16 ("The token \$1,000 offer may appear to have been made simply for the procedural purpose
17 of preserving rights to fees . . . should Defendant win a judgment. However, the
18 weaknesses of Plaintiff's case made this token offer reasonable."); Arrowood, 58 So. 3d at
19 289-90 (holding a court is required to consider an offeror's subjective belief that an offer is
20 reasonable and not just objective factors).

21 This Court concludes the second factor to consider is neutral regarding the Issue
22 Trust and does not inure to any party's favor or disfavor. Todd hoped he would prevail at
23 trial, but given the financial and documentary complexity, discovery delays and disputes
24 (including Todd's continued depositions long after the offers of judgment were made), the
25 untimely accountings, incomplete discovery, and the amounts in controversy, the offer
26 does not appear to be made with the good-faith intention of settling Wendy's claims. In
27 contrast, Todd's offer to settle Wendy's claims against him individually for the payment of
28 \$25,000 appears more reflective of the circumstances and was made with a good-faith

1 intention to settle the claims. Thus, this factor favors Todd individually.

2 *Whether Wendy's decision to reject the offer and proceed to trial was grossly unreasonable*
3 *or in bad faith?* Wendy's decision to reject Todd's offer as trustee of the Issue Trust was not
4 grossly unreasonable or in bad faith. The offer arrived early in discovery. Wendy had
5 incurred substantially more in fees than the offered amount and she was entitled to
6 examine her legal position after discovery was received. In contrast, her decision to reject
7 Todd's individual offer is less reasonable, yet this Court cannot conclude her rejection was
8 grossly unreasonable or made in bad faith. Her decision was simply unwise in retrospect
9 and she cannot now be relieved of its consequences. This third factor weighs in favor of
10 Wendy regarding the Issue Trust and is neutral regarding Todd's personal liability.

11 *Whether the fees sought are reasonable and justified in amount?* Todd's individual and
12 trustee attorneys are experienced in law and trial. They have exemplary records of service
13 in our legal community and they obtained a positive outcome for their clients. After
14 considering each of the Brunzell factors, this Court finds the fees sought by Todd
15 individually from the date of the offer are reasonable in light of his experienced and
16 effective attorneys, duration and scope of litigation, and the result obtained. However,
17 the aggregate fees this Court expects Todd to seek as trustee of the Issue Trust are not
18 justified when the offered \$25,000 is compared to the jury verdict. Shifting substantial
19 attorneys' fees to Wendy is unjustified in this instance. Regarding Todd's individual fees,
20 the amounts are reasonable and justified when charged against Wendy. This factor is
21 neutral with respect to the Issue Trustee offer and favors Todd with respect to his
22 individual offer of judgment.

23 For these reasons, this Court orders as follows:

- 24 a. The trusts shall pay 100% of the fees incurred by their attorneys in
25 representation of the trustees. However, Todd shall reimburse the
26 trusts from his personal resources for 25% of the amount paid because
27 the jury determined he breached his fiduciary duties. Provided,
28 however, Todd is entitled to reduce this 25% personal obligation by

1 the amount of trustee's fees he is ordered to disgorge.

2 b. Wendy is *not* required to pay fees Todd incurred as trustee because
3 she rejected the \$25,000 offer of judgment.

4 c. Wendy *shall* pay 100% of fees Todd incurred individually from the
5 date the offer of judgment was made. Provided, however, Todd shall
6 be Wendy's judgment creditor and have no greater access to payment
7 than any other judgment creditor. Todd may attach or anticipate
8 Wendy's distributive share only if there are no spendthrift provisions
9 within the trust instruments that prohibit such creditor collection
10 efforts. If such spendthrift provisions exist, distributions shall be
11 made to Wendy and Todd may seek collection efforts against Wendy
12 personally, subsequent to the distribution. The trustees (including
13 Todd) shall carefully measure Todd's rights as an individual
14 judgment creditor with their fiduciary duties owed to Wendy as a
15 beneficiary.

16 d. The Trusts shall pay a combined attorneys' fee of \$300,000 to Wendy's
17 attorneys for prevailing in the claim against Todd for breach of
18 fiduciary duties. This payment shall be made directly to Wendy's
19 attorneys without Wendy's signatory participation as a client or trust
20 beneficiary.

21 e. All fees ordered shall be treated as general trust administration
22 expenses and not allocated to any beneficiary's distributive share.

23 f. Todd is not required to indemnify the trust for the \$300,000 payable to
24 Wendy's attorneys because he is already ordered to pay 25% of the
25 aggregate fees incurred in representation of the trustees.

26 g. The request for oral arguments is denied.

27 **Other Issues**

28 1. *Second supplement to first amended counterpetition*

1 On May 9, 2019 (after the legal phase of trial but before the equitable trial), Wendy
2 filed a Second Supplement to her First Amended Counterpetition in which she continued
3 her theme about untimely accountings. Wendy asks this Court to consider the new fact
4 allegation the Family Trust co-trustees failed to prepare and deliver accountings for the
5 Family Trust and Wendy Subtrust for the period from January 1, 2018, to December 31,
6 2018. She requests the production and delivery of these accountings and asks that the
7 trustees be sanctioned. The trustees (including Todd and Stan individually) moved to
8 strike Wendy's supplement because it was filed after the August 2, 2018, deadline to file
9 motions to amend pleadings and violated NRCP 15(d).¹¹ The 2018 accountings were
10 provided to Wendy in early July, 2019, thus rendering Wendy's request to compel moot.

11 It appears the accountings were untimely and this Court agrees Wendy could not
12 have filed the supplement until after the deadline for providing the 2018 accountings had
13 passed. However, the 2018 accountings are not part of the underlying litigation. This
14 Court declines Wendy's invitation to enlarge this litigation to satisfy judicial economy.
15 This litigation is bounded by the pleadings and cannot remain an open receptacle to
16 receive real-time allegations of inappropriate trust administration. The supplement is
17 stricken as beyond the scope of claims before this Court. Wendy may file a separate action
18 challenging the timing and content of the 2018 accountings if she is so inclined. This Court
19 neither encourages nor discourages such litigation.

20 2. *The Lake Tahoe property*

21 Though not placed within a certain claim for relief within her pleadings, Wendy
22 asks this Court to rescind all transactions involving the Lake Tahoe home and restore title
23 to the SSJ LLC, which was 100% owned by the Family Trust. Wendy continues to
24 overwhelm this Court with repetitive and lengthy arguments about the option
25 agreements, forgery, fraud, fiduciary duties, unjust enrichment, trustor intentions,
26 consideration, etc. All of Wendy's arguments were presented to the jury and rejected in
27

28 ¹¹ Stan filed an additional Motion to Dismiss or Motion to Strike, arguing Wendy's supplement alleged a new claim for breach of fiduciary duty that has not been discovered. Todd joined in Stan's motion.

1 the jury's verdict. This Court will not enter any order granting relief to Wendy regarding
2 the Lake Tahoe home.

3 3. *Future distributions*

4 On July 23, 2019, Wendy filed an Emergency Motion to Compel Distribution from
5 the Family Trust. She alleged she was being evicted from her home in Texas and needed
6 money to relocate to either Arizona or Reno. Wendy asked this Court to order the trustees
7 of the Family Trust to distribute \$6,000 for a deposit on a new apartment and \$5,000 per
8 month for living expenses. Wendy further asks this Court to advise the trustees regarding
9 the schedule of other distributions for living expenses. Wendy's motion is denied. This
10 Court will not supervise trust administration on an ongoing basis. It will not provide
11 advisory guidance or otherwise order the trustees regarding administration and
12 distributions. Instead, it will adjudicate disputes through normal judicial processes.
13 Wendy may initiate separate litigation if she is so inclined.

14 4. *Costs.*

15 Todd Jaksick as an individual, Duck Lake Ranch, LLC, and Incline TSS, are the
16 prevailing parties entitled to statutory and reasonable costs. All other parties may file cost
17 memoranda as authorized by law.

18 **Conclusions**

19 1. This Court does not confirm the accountings. However, the substance of the
20 accountings were presented to the jury and fall within the jury's verdict. Thus, this Court
21 will not allow additional litigation as to any accounting that formed the basis for Wendy's
22 legal claims. All future accountings shall be timely and formulated to provide the
23 beneficiaries with adequate notice of values, transactions, and other acts of trust
24 administration. The trustees are authorized to pay, at Wendy's request, a portion of
25 Wendy's distributive shares to Wendy's designated financial professional who will assist
26 her to understand the accountings and interact with the trustees.

27 2. This Court does not confirm the ACPAs or indemnification agreements.
28 However, the substance of the ACPAs and indemnification agreements were presented to

1 the jury and fall within the jury's verdict. This Court will not allow additional litigation as
2 to any of the ACPAs and indemnification agreements that formed the basis for Wendy's
3 legal claims.

4 3. The trustees' request to impose no-contest penalties against Wendy is
5 denied.

6 4. Wendy's claims for unjust enrichment and constructive trust are denied.

7 5. Todd is confirmed as trustee of Issue Trust and co-trustee of Family Trust.
8 All other trustees are also confirmed.

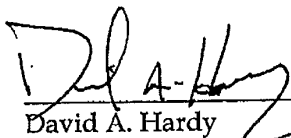
9 6. Todd shall disgorge all trustee fees he received or otherwise earned, subject
10 to the fees award provisions.

11 7. This Court anticipates the parties will seek clarification and other relief
12 through additional motion work. The attorneys' fees provisions in this order reflect the
13 entirety of this Court's intentions regarding fees. This order also reflects the entirety of
14 this Court's intentions regarding all other pending matters.

15 8. Todd and the trustees may submit a proposed judgment consistent with the
16 jury's verdict and this order on equitable claims.

17 **IT IS SO ORDERED.**

18 Dated: March 12, 2020.

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21 David A. Hardy
22 District Court Judge
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EXHIBIT 4

EXHIBIT 4

22

1 CODE: 1075
2 DONALD A. LATTIN, ESQ.
3 Nevada Bar No. 693
4 CAROLYN K. RENNER, ESQ.
5 Nevada Bar No. 9164
6 MAUPIN, COX & LeGOY
7 4785 Caughlin Parkway
8 Reno, Nevada 89519
9 Telephone: (775) 827-2000
10 Facsimile: (775) 827-2185
11 *Attorneys for Petitioners*

12
13 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

14 IN AND FOR THE COUNTY OF WASHOE

15 In the Matter of the: Case No.: PR17-0445
16 SSJ's ISSUE TRUST. Dept. No.: 15

17 _____ / Consolidated

18 In the Matter of the Administration of Case No.: PR17-0446
19 THE SAMUEL S. JAKSICK, JR., FAMILY TRUST. Dept. No.: 15

20 **AFFIDAVIT OF DONALD A. LATTIN, ESQ.**

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

25 I, Donald A. Lattin, do hereby affirm under penalty of perjury that the assertions of this
26 Affidavit are true and based upon personal knowledge of the facts stated herein:

1. I am a shareholder attorney in the law firm of Maupin, Cox & LeGoy.
2. I am the attorney principally responsible for representing Michael Kimmel in the above-entitled action, and have represented Mr. Kimmel since the onset of this matter.
3. On April 30, 2018, we served an Offer of Judgment upon Wendy Jaksick ("Wendy") through her counsel of record. Wendy rejected the Offer of Judgment by virtue of its nonacceptance. No counter-offer was made.
4. Since service of the Offer of Judgment, the Family Trust has incurred the total sum of \$498,646.25 in attorneys' fees that have been paid to the law firm of Maupin, Cox & LeGoy (the "Law Firm"). See Exhibit A attached hereto. The amount of those fees allocated for the defense of Kimmel in his individual capacity and as Co-Trustee of the Family Trust is twenty-five percent (25%), based on him being one of four Co-Trustees of the Family Trust sued in this matter. There was no allocation from Wendy with respect to damages attributable to each respective Co-Trustee, and as such, the Family Trust had to be defended as a whole and one way to split the cost of defense is to divide the total amount by the number of Co-Trustees sued. Accordingly, Kimmel's share would be 25% of the total cost. Twenty-five percent of the total amount billed to the Family Trust since serving the April 30, 2018 Offer of Judgment is $\$498,646.25 \times .25 = \$124,616.56$.
5. Regarding the qualifications of counsel, the undersigned's law firm as a whole has received an "AV" peer rating from Martindale Hubbell.
6. I have legal practice experience exceeding 35 years (admitted in Nevada 1981) including extensive experience in complex civil litigation. I have received a personal

1 Martindale Hubbell "AV" rating, I am a member of the Nevada Bar, and I am admitted
2 to practice before the United States Supreme Court and various federal District Courts.
3 I served as lead counsel on this case and was involved in all matters from discovery
4 through trial.

5 7. Mr. LeGoy has more than 40 years of legal experience and expertise in the area of
6 estate planning. He has received a personal Martindale Hubbell "AV" rating and is a
7 member of the Nevada and California State Bars. Mr. LeGoy was involved in the
8 litigation as a resource given that he drafted the trust at issue and given his years of
9 legal work in the areas of trust and estate planning.

10 8. Mr. McQuaid has 20 years of legal experience and expertise in the area of estate
11 planning. He has received a personal Martindale Hubbell "AV" rating and is a member
12 of the Nevada and California State Bars. Mr. McQuaid was involved in the litigation
13 as a resource given that he was involved in some of the trust administration events at
14 issue and given his years of legal work in the areas of trust and estate planning.

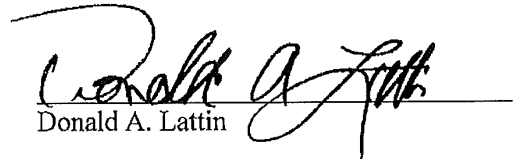
15 9. Carolyn K. Renner has fourteen (14) years of experience with the litigation section of
16 Maupin, Cox & LeGoy. She is a member of the Nevada Bar and is admitted to practice
17 before all Nevada State and Federal courts. Ms. Renner's time included handling
18 discovery, motion, and pretrial work.

19 10. Kristen Matteoni is a first-year associate at Maupin, Cox & LeGoy. Ms. Matteoni
20 graduated from her law school in the top 5% of her class and began her law career as a
21 clerk for Justice Gibbons, Chief Justice at the Nevada Supreme Court. Ms. Matteoni
22 handled various aspects of the case including discovery, motion, and pretrial work.
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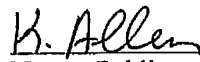
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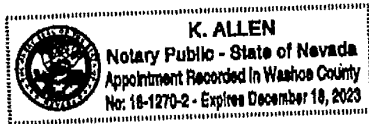
11. The Law Firm as a whole has received an "AV" peer rating from Martindale Hubbell.

DATED this 9th day of April, 2020.


Donald A. Lattin

Signed and Affirmed before me on
this 9th day of April, 2020,
by Donald A. Lattin.


Notary Public



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EXHIBIT A

EXHIBIT A

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Fees for Donald A. Lattin, Esq.

Fees for Donald A. Lattin, Esq.

#	Type	Date	Atty	Description	Hours	Amount
729141	H	05/01/18	308	REVIEW OF DOCUMENTS DISCLOSED BY WENDY IN RESPONSE TO REQUEST FOR PRODUCTION; CORRESPONDENCE TO MIKE AND TODD RE: [REDACTED]	3.25	1462.50
729286	H	05/02/18	308	CONTINUED REVIEW OF WENDY DOCUMENTS.	1.00	450.00
729321	H	05/03/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF REPLY TO OPPOSITION TO MOTION TO DISMISS TO DETERMINE; RESPONSE TO DISCOVERY COMMISSIONER ON UPCOMING HEARING; CONTINUED REVIEW OF DOCUMENTS FOR DEPOSITIONS.	3.25	1462.50
729537	H	05/04/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM ADAM HOSMER-HENNER RE: STAN JAKSICK DEPOSITION; CORRESPONDENCE TO KENT.	1.75	787.50
729772	H	05/07/18	308	REVIEW OF ADDITIONAL DOCUMENTS PRODUCED BY WENDY; REVIEW AND REVISE POSITION LETTER TO DISCOVERY COMMISSIONER ON ATTORNEY CLIENT PRIVILEGE; REVIEW OF WENDY'S POSITION STATEMENT ON ATTORNEY PRIVILEGE ISSUES.	2.25	1012.50
729859	H	05/08/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] CORRESPONDENCE TO PHIL AND ADAM RE: REPRESENTATION OF STAN BY PHIL KREITELIN; ATTEND HEARING WITH DISCOVERY COMMISSIONER; MEETING WITH KENT AND TODD TO DISCUSS [REDACTED]	3.00	1350.00
730434	H	05/09/18	308	TELEPHONE CONFERENCE WITH ADAM RE: REPRESENTATION OF STAN AS TRUSTEE BY PHIL KREITELIN; REVIEW OF ADDITIONAL PRIVILEGED DOCUMENTS REVEALED BY WENDY'S COUNSEL.	2.75	1237.50
730453	H	05/15/18	308	REVIEW OF CORRESPONDENCE FROM WENDY'S COUNSEL RE: REQUEST FOR AN EXTENSION OF TIME.	0.50	225.00
730492	H	05/16/18	308	REVIEW OF MASTER'S RECOMMENDATION RE: PRIVILEGED DOCUMENTS; CORRESPONDENCE TO TRUSTEES RE: DISCOVERY MASTERS DECISION.	0.25	112.50
730607	H	05/17/18	308	REVIEW OF CORRESPONDENCE FROM KENT ON [REDACTED] REVIEW	3.25	1462.50

#	Type	Date	Atty	Description	Hours	Amount
				OF WENDY'S DOCUMENTS FOR DEPOSITION; TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED]		
730830	H	05/21/18	308	REVIEW OF ADDITIONAL WENDY DOCUMENTS.	1.50	675.00
731001	H	05/22/18	308	REVIEW OF CONVERSATION WITH ADAM RE: STAN'S REPRESENTATION; CORRESPONDENCE TO ADAM AND PHIL RE: CONFERENCE CALL.	0.75	337.50
731268	H	05/23/18	308	REVIEW OF OBJECTIONS FILED BY ADAM HOSMER-HENNER; REVIEW OF CORRESPONDENCE FROM ADAM TO KENT RE: DEPOSITION OF STAN JAKSICK; CONFERENCE CALL WITH PHIL KREITLEIN AND ADAM.	2.50	1125.00
731358	H	05/24/18	308	TELEPHONE CONFERENCE WITH KENT TO DISCUSS [REDACTED] REVIEW AND REVISE CORRESPONDENCE TO PHIL AND ADAM RE: REPRESENTATION; REVIEW OF CORRESPONDENCE FROM KENT TO COUNSEL FOR STAN RE: DEPOSITION.	1.50	675.00
731444	H	05/25/18	308	REVIEW AND FINALIZE CORRESPONDENCE TO COUNSEL FOR WENDY RE: DECLARATIONS AND PRIVILEGED DOCUMENTS.	0.75	337.50
731667	H	05/29/18	308	REVIEW OF WENDY'S RESPONSES TO INTERROGATORIES; REVIEW OF CORRESPONDENCE FROM KENT ROBISON TO JUDGE HARDY; CORRESPONDENCE TO TRUSTEES RE: [REDACTED]	1.75	787.50
731693	H	05/30/18	308	REVIEW OF CORRESPONDENCE FROM ADAM HOSMER-HENNER RE: DOCUMENTS REQUESTED FROM VARIOUS ENTITIES; CORRESPONDENCE TO KEVIN RE: DOCUMENT REQUESTS; MEETING WITH KENT TO DISCUSS [REDACTED]	2.75	1237.50
731770	H	05/31/18	308	REVIEW OF WENDY'S VERIFIED PETITION AND NRS PROVISIONS ON PROPER VERIFICATION; CORRESPONDENCE TO ALL TRUSTEES RE: [REDACTED]	3.00	1350.00
731972	H	06/01/18	308	REVIEW AND REVISE STATUS REPORT.	0.50	225.00
732436	H	06/04/18	308	HEARING WITH DISCOVERY COMMISSIONER ON DISCOVERY ISSUES; BEGIN DEPOSITION OF WENDY JAKSICK.	4.00	1800.00
732439	H	06/05/18	308	ATTEND DEPOSITION OF WENDY JAKSICK.	4.00	1800.00
732442	H	06/06/18	308	ATTEND DEPOSITION OF WENDY JAKSICK.	4.00	1800.00
732645	H	06/07/18	308	DICTATE CORRESPONDENCE TO WENDY'S COUNSEL RE: DISMISSAL OF MIKE	1.75	787.50

#	Type	Date	Atty	Description	Hours	Amount
				KIMMEL FROM LAWSUIT; CORRESPONDENCE TO TRUSTEES RE: [REDACTED] MEETING WITH BOB LEGOY AND BRIAN MCOUAID RE: [REDACTED]		
732656	H	06/08/18	308	TELEPHONE CONFERENCE WITH ALL COUNSEL TO REVIEW DISCOVERY SCHEDULE AND ISSUES; MEETING WITH TODD; MEETING WITH PIERRE HASCHEFF TO DISCUSS [REDACTED]	4.50	2025.00
732852	H	06/11/18	308	REVIEW OF DEPOSITION NOTES FOR WENDY'S CONTINUED DEPOSITION; REVIEW OF VOL. 1 OF WENDY'S DEPOSITION.	1.75	787.50
732918	H	06/12/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.50	225.00
733028	H	06/13/18	308	REVIEW OF CORRESPONDENCE FROM STAN TO BILL DOUGLAS RE: JACKRABBIT; REVIEW OF PAYMENTS TO WENDY FROM LIFE INSURANCE TRUST AND FAMILY TRUST FROM DATE OF DEATH TO 2016; MEET AND CONFER WITH ALL COUNSEL RE: DISCOVERY REQUEST; REVIEW OF TODD JAKSICK'S DISCOVERY ISSUE STATEMENT.	2.00	900.00
733211	H	06/14/18	308	APPEARANCE BEFORE DISCOVERY COMMISSIONER; STATUS REPORT TO TRUSTEES ON [REDACTED]	1.00	450.00
733268	H	06/18/18	308	CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED] REVIEW OF MINUTE NOTES FOR DISCLOSURES; CORRESPONDENCE TO ADAM RE: KEVIN'S DOCUMENTS.	1.00	450.00
733583	H	06/19/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL TO DISCUSS [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM TODD RE: [REDACTED]	1.00	450.00
733633	H	06/20/18	308	REVIEW AND REVISE CORRESPONDENCE FROM TODD RE: [REDACTED] REVIEW AND REVISE CORRESPONDENCE TO PHIL KREITLEIN.	0.75	337.50
733693	H	06/21/18	308	REVIEW OF CORRESPONDENCE FROM MARK CONNOT RE" TERMS OF DISMISSAL FOR MIKE KIMMEL; MEETING WITH DEFENSE COUNSEL; CORRESPONDENCE TO KENT RE: [REDACTED]	2.75	1237.50
733809	H	06/22/18	308	REVIEW OF CORRESPONDENCE FROM MIKE	0.75	337.50

#	Type	Date	Atty	Description	Hours	Amount
735001	H	06/26/18	308	KIMMEL ON [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW AND REVISE RESPONSE TO WENDY'S FIRST REQUEST FOR PRODUCTION; MEETING WITH KENT AND TODD.	1.25	562.50
735031	H	07/05/18	308	REVIEW OF CORRESPONDENCE FROM KENT ROBISON ON OBJECTIONS TO SUBPOENAS; MEETING WITH MIKE KIMMEL TO DISCUSS [REDACTED]	4.25	1912.50
735060	H	07/06/18	308	ATTEND AND DEFEND DEPOSITION OF MIKE KIMMEL; REVIEW OF EMAIL CORRESPONDENCE FROM ADAM RE: 30(b)(6) DEPOSITIONS; MEETING WITH KENT ROBISON RE: [REDACTED]	6.00	2700.00
735177	H	07/09/18	308	REVIEW OF SUBPOENAS TO VARIOUS ENTITIES TO FORMULATE OBJECTIONS; REVIEW AND REVISE LETTER TO KREITLEIN AND CORRESPONDENCE TO TODD RE: [REDACTED]	1.25	562.50
735253	H	07/10/18	308	REVIEW AND REVISE CORRESPONDENCE TO PHIL KREITLEIN RE: TRUST ADMINISTRATION ITEMS; CORRESPONDENCE TO KENT RE: [REDACTED]	1.00	450.00
735348	H	07/11/18	308	CONFERENCE CALL WITH KENT AND TODD RE: [REDACTED] MEETING WITH TODD RE: [REDACTED]	1.75	787.50
735483	H	07/12/18	308	REVIEW OF CORRESPONDENCE TO JUDGE HASCHIEFF RE: DEPOSITION; PREPARE DEPOSITION POINTS FOR TODD.	1.00	450.00
735560	H	07/13/18	308	REVIEW OF TODD JAKSICK FAMILY TRUST OBJECTIONS TO SUBPOENA DUCES TECUM.	0.75	337.50
735862	H	07/16/18	308	MEETING WITH TODD TO [REDACTED] [REDACTED]	1.00	450.00
736472	H	07/23/18	308	REVIEW OF CORRESPONDENCE FROM ADAM RE: MEET AND CONFER ISSUES.	0.25	112.50
736511	H	07/24/18	308	CONFERENCE CALL WITH ADAM TO REVIEW OBJECTIONS TO SUBPOENAS.	0.75	337.50
736882	H	07/27/18	308	TELEPHONE CONFERENCE WITH TODD TO DISCUSS [REDACTED] [REDACTED] REVIEW AND REVISE OBJECTIONS TO SUBPOENAS.	1.50	675.00
737065	H	07/30/18	308	REVIEW OF CORRESPONDENCE FROM WENDY'S COUNSEL RE: REQUEST FOR PRODUCTION:	0.50	225.00
737268	H	07/31/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] TELEPHONE CONFERENCE WITH KENT ROBISON RE: [REDACTED]	1.25	562.50

#	Type	Date	Atty	Description	Hours	Amount
				[REDACTED] FINALIZE OBJECTIONS TO SUBPOENAS.		
737713	H	08/03/18	308	MEETING WITH TODD TO REVIEW [REDACTED]	2.50	1125.00
737717	H	08/06/18	308	ATTEND DEPOSITION OF STAN JAKSICK.	5.00	2250.00
738156	H	08/07/18	308	CORRESPONDENCE TO KEVIN RILEY RE: DEPOSITION; ATTEND 2ND DAY OF STAN JAKSICK DEPOSITION; REVIEW OF VARIOUS SUBPOENA DUCES TECUM FILED BY MARK CONNOT.	6.00	2700.00
738160	H	08/08/18	308	ATTEND STAN JAKSICK DEPOSITION.	6.00	2700.00
738163	H	08/09/18	308	ATTEND STAN JAKSICK DEPOSITION.	6.00	2700.00
738582	H	08/10/18	308	COMPLETE DEPOSITION OF WENDY JAKSICK.	3.25	1462.50
738586	H	08/13/18	308	MEETING WITH TODD JAKSICK; DEPOSITION OF TODD JAKSICK.	5.50	2475.00
738589	H	08/14/18	308	DEPOSITION OF TODD JAKSICK.	5.00	2250.00
738591	H	08/15/18	308	DEPOSITION OF TODD JAKSICK.	3.50	1575.00
738722	H	08/16/18	308	DEPOSITION OF TODD JAKSICK.	4.00	1800.00
738731	H	08/17/18	308	TELEPHONE CONFERENCE WITH ADAM HOSMER-HENNER RE: DEPOSITION OF KEVIN RILEY; CORRESPONDENCE TO ADAM RE: DEPOSITION DATES; CORRESPONDENCE TO PHIL KREITLEIN RE: TRUST ACCOUNTING; MEETING WITH TODD TO REVIEW DEPOSITION ISSUES; REVIEW MOTION TO STOP DEPOSITION.	2.75	1237.50
738950	H	08/20/18	308	REVIEW OF SUBPOENA; REVIEW AND REVISE OBJECTIONS TO SUBPOENAS; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.75	787.50
739166	H	08/21/18	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED] CORRESPONDENCE TO KENT RE: [REDACTED] [REDACTED]	0.75	337.50
739338	H	08/23/18	308	MEETING WITH TODD AND KENT TO [REDACTED] REVIEW OF DOCUMENTS TO PRODUCE FOR FAMILY TRUST.	1.75	787.50
739413	H	08/24/18	308	REVIEW OF STAN'S OBJECTION TO MONTREUX AND TOIYABE SUBPOENAS; MEETING WITH KENT AND PIERRE HASCHEFF.	2.25	1012.50
739535	H	08/27/18	308	REVIEW OF EMAIL FROM MARK CONNOT RE: DISMISSAL OF MIKE KIMMEL; MEETING WITH TODD, JESSICA AND JIM CORICA; MEETING WITH TODD AND JESSICA TO [REDACTED] [REDACTED]	2.25	1012.50
739620	H	08/28/18	308	MEETING WITH ADAM TO DISCUSS LITIGATION ISSUES; TELEPHONE	1.75	787.50

#	Type	Date	Atty	Description	Hours	Amount
				CONFERENCE WITH MIKE KIMMEL TO [REDACTED] CORRESPONDENCE TO ALL PARTIES RE: PROPOSED STIPULATION TO DISMISS; TELEPHONE CONFERENCE WITH KENT RE: [REDACTED]		
739749	H	08/29/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.00	450.00
739949	H	08/30/18	308	CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM OPPOSING COUNSEL RE: DEPOSITIONS. MEETING WITH TRUSTEES RE: [REDACTED]	0.75	337.50
740078	H	08/31/18	308	ATTEND 30(b)(6) DEPOSITIONS OF JAKSICK FAMILY, LLC AND TOIYABE; CONFERENCE WITH OPPOSING COUNSEL RE: SETTLEMENT STRATEGIES.	0.75	337.50
740309	H	09/04/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF VARIOUS EMAIL OBJECTIONS TO PIERRE HASCHOFF'S DEPOSITION.	3.00	1350.00
740620	H	09/06/18	308	CORRESPONDENCE TO ADAM AND KENT RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.75	337.50
740687	H	09/07/18	308	REVIEW OF CORRESPONDENCE FROM KEVIN RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO ADAM AND KENT RE: [REDACTED]	0.75	337.50
740759	H	09/10/18	308	ATTEND MEETING WITH TODD AND KENT ATTEND DEPOSITION OF DAVE JAMISON; MEETING WITH KENT AND ADAM TO DISCUSS SETTLEMENT ISSUES; REVIEW AND REVISE REPLY IN SUPPORT OF MOTION TO TERMINATE OR LIMIT DEPOSITION.	3.50	1575.00
740833	H	09/11/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL TO DISCUSS [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH KEVIN SPENCER AND ZACH JOHNSON RE: DISCOVERY ISSUES; CORRESPONDENCE TO ADAM AND KENT RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD AND KENT RE: [REDACTED]	2.00	900.00
740899	H	09/12/18	308	REVIEW OF CORRESPONDENCE FROM DALLAS COUNCIL RE: A "MEET AND CONFER" TO BE PRODUCED; REVIEW OF	2.00	900.00

#	Type	Date	Atty	Description	Hours	Amount
741114	H	09/13/18	308	VARIOUS DOCUMENTS PROVIDED BY JESSICA. CONFERENCE CALL WITH KENT TO DISCUSS [REDACTED]	1.00	450.00
741123	H	09/14/18	308	TELEPHONE CONFERENCE WITH STAN. ATTEND DEPOSITION OF PIERRE HASCHEFF; MEETING WITH TODD AND MIKE TO DISCUSS [REDACTED]	3.00	1350.00
741721	H	09/17/18	308	REVIEW OF CORRESPONDENCE RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO TODD AND MIKE RE: [REDACTED]	1.75	787.50
741729	H	09/18/18	308	MEETING WITH TODD TO DISCUSS [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH DAVE REID AT SHAKEYS AND CORRESPONDENCE TO DAVE RE: SALE DOCUMENTS.	2.00	900.00
741738	H	09/19/18	308	REVIEW OF EMAILS RE: REVISED DISCOVERY STIPULATION; REVIEW AND REVISE SUPPLEMENTAL PETITION FOR FAMILY TRUST ACCOUNTING; REVIEW OF CORRESPONDENCE FROM COUNSEL FOR PIERRE HASCHEFF RE: CONTINUED DEPOSITION OF PIERRE.	1.75	787.50
741740	H	09/20/18	308	MEETING WITH TODD TO [REDACTED] [REDACTED] CONFERENCE CALL WITH TODD AND KEVIN TO DISCUSS [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD AND MIKE TO DISCUSS [REDACTED]	2.25	1012.50
741750	H	09/21/18	308	REVIEW OF CORRESPONDENCE FROM WENDY'S COUNSEL RE: MOTION TO TERMINATE AND CONTINUED DEPOSITION OF PIERRE HASCHEFF.	0.75	337.50
742024	H	09/24/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] REVIEW OF BUCKHORN DOCUMENTS TO BE PRODUCED.	0.75	337.50
742087	H	09/25/18	308	REVIEW OF PETITION TO RECOVER MONEY PREPARED BY KENT ROBISON; FINAL REVIEW OF BUCKHORN DISCLOSURES.	0.75	337.50
742157	H	09/26/18	308	TELEPHONE CONFERENCE WITH KENT TO [REDACTED] [REDACTED] PETITION FOR RETURN OF MONEY AND DISCOVERY ISSUES; TELEPHONE CONFERENCE WITH TODD TO [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH KEVIN.	1.00	450.00

#	Type	Date	Atty	Description	Hours	Amount
742243	H	09/27/18	308	TELEPHONE CONFERENCE WITH TODD TO DISCUSS [REDACTED]	0.25	112.50
742315	H	09/28/18	308	TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED]	1.00	450.00
742648	H	10/02/18	308	REVIEW AND REVISE OPPOSITION TO EMERGENCY MOTION TO CONTINUE TRIAL; REVIEW OF CORRESPONDENCE FROM TODD ALEXANDER RE: CONTINUED DEPOSITION OF PIERRE HASCHEFF; TELEPHONE CONFERENCE WITH PHIL KREITLIEIN RE: TRUST ADMINISTRATION ISSUES; REVIEW OF PETITION FOR RECONVEYANCE OF FUNDS AND CORRESPONDENCE TO TRUSTEES; REVIEW OF CORRESPONDENCE FROM ADAM RE: DEPOSITION OF HASCHEFF.	2.00	900.00
742896	H	10/03/18	308	REVIEW OF INTERROGATORIES FROM WENDY TO STAN AND CORRESPONDENCE TO TODD AND MIKE RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM KENT ROBISON RE: [REDACTED]	1.00	450.00
742945	H	10/04/18	308	CORRESPONDENCE TO KENT RE: [REDACTED] CORRESPONDENCE TO TODD RE: [REDACTED]	0.50	225.00
743003	H	10/05/18	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO PHIL KRIETLIEN RE: CHECKS; CORRESPONDENCE TO MIKE KIMMEL RE: [REDACTED]	0.75	337.50
743053	H	10/08/18	308	REVIEW OF CORRESPONDENCE FROM KEVIN RE: [REDACTED] CORRESPONDENCE TO PHIL KRIETLIEN RE: FAMILY TRUST PAYMENTS; REVIEW AND REVISE COVENANT ISSUES; MEETING WITH KENT AND TODD TO [REDACTED] CONFERENCE CALL WITH KENT AND ZAC JOHNSON TO "MEET AND CONFER" ON SUBPOENA ISSUES.	2.75	1237.50
743069	H	10/09/18	308	CONFERENCE CALL WITH TODD AND MIKE RE: [REDACTED] CORRESPONDENCE TO PHIL KREITLIEIN RE: AG CREDIT LOAN.	1.50	675.00
743130	H	10/10/18	308	TELEPHONE CONFERENCE WITH PHIL KREITLIEIN RE: PAYMENT TO AG CREDIT;	1.25	562.50

#	Type	Date	Atty	Description	Hours	Amount
743236	H	10/11/18	308	CONFERENCE CALL WITH MIKE AND TODD TO DISCUSS [REDACTED] REVIEW OF CORRESPONDENCE FROM COUNSEL FOR WENDY ON HASCHEFF DOCUMENTS. CORRESPONDENCE TO TODD AND MIKE RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM ADAM HOSMER-HENNER RE: DEPOSITION OF PIERRE HASCHEFF; REVIEW OF PIERRE DOCUMENTS PROVIDED TO ADAM FROM PIERRE'S FILES.	1.75	787.50
743282	H	10/12/18	308	CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED] [REDACTED] REVIEW OF MOTION FOR SUMMARY JUDGMENT; REVIEW OF CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] [REDACTED]	1.00	450.00
743642	H	10/15/18	308	CORRESPONDENCE TO KEVIN RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM KEVIN; TELEPHONE CONFERENCE WITH ADAM AND PHIL RE: TRUST ADMINISTRATION ISSUES.	1.00	450.00
743765	H	10/16/18	308	CONFERENCE CALL WITH ALL COUNSEL WITH DISCOVERY COMMISSIONER RE: JUDGE HARDY ORDER ON DEPOSITIONS.	3.00	1350.00
743842	H	10/17/18	308	CORRESPONDENCE TO TRUSTEES RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] [REDACTED]	1.50	675.00
743942	H	10/18/18	308	REVIEW OF ADDITIONAL DOCUMENTS TO BE PRODUCED; CONFERENCE CALL WITH DISCOVERY COMMISSIONER AND ALL COUNSEL.	3.00	1350.00
744137	H	10/22/18	308	REVIEW AND REVISE MOTION FOR SUMMARY JUDGMENT RELATIVE TO MIKE KIMMEL; CONFERENCE CALL WITH TODD AND JESSICA [REDACTED] [REDACTED]	2.00	900.00
744248	H	10/23/18	308	REVIEW AND REVISE MOTION FOR SUMMARY JUDGMENT ON BEHALF OF MIKE KIMMEL FOR FILING.	1.75	787.50
744282	H	10/24/18	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED] [REDACTED] REVIEW OF ORDER FROM THE COURT DENYING MOTION FOR	2.50	1125.00

#	Type	Date	Atty	Description	Hours	Amount
				CONTINUANCE AND FOR SCHEDULING CONFERENCE; TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: TRUST CHECKS.		
744452	H	10/25/18	308	REVIEW OF OFFER FROM LITTLE BIRD, ENTERPRISES AND CORRESPONDENCE TO KREITLEIN RE: OFFER TO PURCHASE FERRARI; CORRESPONDENCE TO KENT RE: [REDACTED]	2.00	900.00
744543	H	10/26/18	308	MEETING WITH KENT AND TODD RE: [REDACTED]	0.61	274.50
744548	H	10/29/18	308	ATTEND DEPOSITION OF KEVIN RILEY AND MEETING WITH KEVIN TO DISCUSS [REDACTED]	3.34	1503.00
744641	H	10/30/18	308	DEPOSITION OF KEVIN RILEY AND TODD JAKSICK.	3.00	1350.00
744739	H	10/31/18	308	DEPOSITION OF TODD JAKSICK.	3.00	1350.00
744874	H	11/01/18	308	REVIEW AND REVISE OPPOSITION TO WENDY'S MOTION TO COMPEL; TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	2.00	900.00
745135	H	11/02/18	308	TELEPHONE CONFERENCE WITH LITTLE BIRD (ELI ZELTZER) RE: PURCHASE OF FERRARI; REVIEW OF LIMITED OPPOSITION TO TODD'S PETITION FOR RETURN OF FUNDS.	0.50	225.00
745226	H	11/05/18	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED]	0.50	225.00
745479	H	11/06/18	308	REVIEW OF CORRESPONDENCE FROM KEVIN RILEY TO [REDACTED] [REDACTED]	0.25	112.50
745679	H	11/08/18	308	REVIEW OF CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE RE: [REDACTED]	0.50	225.00
745887	H	11/09/18	308	MEETING WITH TODD AND KENT TO DISCUSS [REDACTED] [REDACTED]	2.00	900.00
746020	H	11/13/18	308	CONFERENCE CALL WITH KEVIN RILEY AND BOB LEGOY RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH MIKE AND TODD RE: [REDACTED] CORRESPONDENCE TO TRUSTEES RE: [REDACTED] [REDACTED]	1.75	787.50
746329	H	11/15/18	308	REVIEW OF MOTION TO COMPEL FILED BY WENDY AGAINST JESSICA CLAYTON; REVIEW AND REVISE STATUS REPORT TO	2.00	900.00

#	Type	Date	Atty	Description	Hours	Amount
746331	H	11/16/18	308	THE COURT; PREPARE FOR STATUS CONFERENCE WITH ALL COUNSEL INCLUDING MOTION TO COMPEL AND OPPOSITION. ATTEND STATUS CONFERENCE WITH JUDGE HARDY; MEETING WITH TODD AND CAROLYN RENNER TO DISCUSS [REDACTED] [REDACTED] CORRESPONDENCE TO ALL COUNSEL RE: KEVIN RILEY DEPOSITION; TELEPHONE CONFERENCE WITH KEVIN TO DISCUSS [REDACTED]	4.00	1800.00
746334	H	11/17/18	308	ATTEND DEPOSITION OF PIERRE HASCHEFF.	2.90	1305.00
746574	H	11/19/18	308	CONFERENCE CALL WITH KENT AND THERESE TO DISCUSS [REDACTED]	0.75	337.50
746583	H	11/20/18	308	REVIEW OF REQUEST FOR PRODUCTIONS FROM WENDY FOR 81 ENTITIES; CORRESPONDENCE TO COMMISSIONER AYERS RE: APPROVED SETTLEMENT JUDGES.	1.00	450.00
746996	H	11/26/18	308	REVIEW AND REVISE REPLY TO OPPOSITION TO MOTION FOR SUMMARY JUDGMENT (FOR KIMMEL); REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED] [REDACTED] CORRESPONDENCE TO LITTLE BIRD ENTERPRISE RE: FERRARI SALE.	1.75	787.50
747068	H	11/27/18	308	MEETING WITH TODD; CONFERENCE CALL WITH KEVIN AND TODD RE: [REDACTED] [REDACTED] REVIEW OF DISCOVERY RESPONSES TO WENDY'S REQUESTS.	2.25	1012.50
747223	H	11/28/18	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] [REDACTED] REVIEW OF RESPONSES TO DISCOVERY REQUESTS TO STANS REQUESTS FOR ADMISSIONS AND INTERROGATORIES; CONFERENCE CALL WITH CAROLYN RENNER AND TODD TO DISCUSS [REDACTED]	2.75	1237.50
747349	H	11/29/18	308	TELEPHONE CONFERENCE WITH KENT RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM MARK CONNOT ON TRIAL PROTOCOL; BEGIN REVIEW OF DEPOSITION EXHIBITS; MEETING WITH TODD AND KENT TO DISCUSS [REDACTED]	2.75	1237.50
747495	H	11/30/18	308	REVIEW OF CORRESPONDENCE FROM ZACH JOHNSON RE: REQUEST FOR ACCOUNTING ON SUBTRUSTS; REVIEW OF CORRECTED	2.25	1012.50

#	Type	Date	Atty	Description	Hours	Amount
				ORDER FROM JUDGE HARDY; TELEPHONE CONFERENCE WITH ADAM HOSMER-HENNER . RE: SUBTRUST ISSUES; TELEPHONE CONFERENCE WITH BILL PETERSON RE: JACKRABBIT CAPITAL CALL; TELEPHONE CONFERENCE WITH KENT RE [REDACTED] [REDACTED] FINAL REVIEW OF DISCOVERY RESPONSES TO STAN'S REQUEST FOR ADMISSION.		
747732	H	12/03/18	308	REVIEW OF CORRESPONDENCE FROM KIMMEL RE: [REDACTED] [REDACTED] STATUS REPORT TO KIMMEL ON [REDACTED] REVIEW OF CORRESPONDENCE FROM KENT ROBISON RE: [REDACTED]	1.00	450.00
747968	H	12/04/18	308	CONFERENCE WITH CAROLYN RENNER TO DISCUSS [REDACTED] TELEPHONE CONFERENCE WITH TODD TO [REDACTED] CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED]	3.00	1350.00
748035	H	12/05/18	308	TELEPHONE CONFERENCE WITH KENT TO DISCUSS [REDACTED] [REDACTED]	2.00	900.00
748135	H	12/06/18	308	REVIEW OF CORRESPONDENCE FROM LITTLE BYRD ENTERPRISES RE: STATUS OF TITLE; REVIEW AND REVISE RESPONSE TO EMERGENCY MOTIONS; REVIEW OF 706 ESTATE TAX RETURN; CONFERENCE CALL WITH TODD AND KENT; FINAL REVIEW OF RESPONSE TO EMERGENCY MOTION.	2.25	1012.50
748191	H	12/07/18	308	TELEPHONE CONFERENCE WITH KENT RE: [REDACTED] [REDACTED] REVIEW OF STATUS REPORT FILED BY STAN JAKSICK; TELEPHONE CONFERENCE WITH TODD RE [REDACTED] [REDACTED] REVIEW OF WENDY JAKSICK'S STATUS REPORT ON DISCOVERY.	1.25	562.50
748421	H	12/10/18	308	REVIEW OF SUBPOENAS TO SAM'S DOCTORS; CORRESPONDENCE TO TRUSTEES RE: [REDACTED] [REDACTED] CORRESPONDENCE TO KENT RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD AND MIKE RE: [REDACTED]	2.25	1012.50
748474	H	12/11/18	308	CORRESPONDENCE TO ALL PARTIES RE: SETTLEMENT CONFERENCE;	4.00	1800.00

#	Type	Date	Atty	Description	Hours	Amount
				CORRESPONDENCE TO MIKE, TODD AND KEVIN RE: [REDACTED] EMAIL CORRESPONDENCE TO TODD, MIKE AND KEVIN RE: [REDACTED] [REDACTED] MEETING WITH KENT AND TODD TO DISCUSS [REDACTED] CONFERENCE WITH ALL COUNSEL BEFORE DISCOVERY COMMISSIONER. CORRESPONDENCE TO KEVIN IN RE: [REDACTED]	3.00	1350.00
748559	H	12/12/18	308	[REDACTED] TELEPHONE CONFERENCE WITH KEVIN AND TODD TO DISCUSS [REDACTED] [REDACTED] BEGIN REVIEW OF KEVIN RILEY DOCUMENTS FOR DISCLOSURES. REVIEW OF CORRESPONDENCE FROM KEVIN RE: [REDACTED] TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED] REVIEW OF PROPOSED JOINT DISCOVERY STATUS REPORT; CALL WITH TODD AND KEVIN TO DISCUSS [REDACTED]	3.00	1350.00
748745	H	12/13/18	308	REVIEW OF CORRESPONDENCE FROM PHIL KREITLEIN; CONTINUED REVIEW OF RILEY DOCUMENTS FOR DISCLOSURE; CORRESPONDENCE TO KEVIN RILEY RE: 706 ISSUES.	2.00	900.00
748811	H	12/14/18	308	TELEPHONE CONFERENCE WITH KENT AND TODD RE: [REDACTED] REVIEW AND REVISE SUPPLEMENTAL DISCLOSURES FOR SSJ ISSUE TRUST AND KEVIN RILEY; REVIEW OF ADDITIONAL DOCUMENTS TO BE DISCLOSED.	1.75	787.50
748922	H	12/17/18	308	REVIEW OF REPLY TO OPPOSITION TO MOTION TO AMEND FILED BY WENDY JAKSICK; REVIEW OF WENDY JAKSICK'S INITIAL EXPERT DISCLOSURES; ARGUMENTS BEFORE DISCOVERY COMMISSIONER ON DISCOVERY ISSUES.	1.75	787.50
749197	H	12/18/18	308	REVIEW OF EXPERT DISCLOSURES FROM STAN JAKSICK; REVIEW OF CORRESPONDENCE FROM KENTON JACK RABBIT CAPITAL CALL; CORRESPONDENCE TO PHIL KREITLEIN RE: SJ RANCH, LLC; REVIEW OF PROPOSED SETTLEMENT SCENARIOS; MEETING WITH TODD.	2.00	900.00
749247	H	12/19/18	308	REVIEW OF RECOMMENDATION FOR ORDER RE: KEVIN RILEY DEPOSITION; CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE:	3.75	1687.50

#	Type	Date	Atty	Description	Hours	Amount
749458	H	12/21/18	308	<p>TELEPHONE CONFERENCE WITH TODD TO DISCUSS CONTINUED REVIEW OF TRIAL EXHIBITS FOR TRIAL PREPARATION. REVIEW OF BRIAN MCQUAID DOCUMENTS; TELEPHONE CONFERENCE WITH TODD RE: REVIEW AND REPLY OPPOSITION TO WENDY'S MOTION TO COMPEL FROM BOB LEGOY AND MCL.</p>	2.50	1125.00
749490	H	12/24/18	308	REVIEW OF ADDITIONAL DISCLOSURES MADE BY STAN; REVIEW OF PIERRE HASCHEFF ISSUES WITH TODD.	1.00	450.00
749587	H	12/26/18	308	REVIEW OF ERRATA FILED BY WENDY SUBSTITUTING WENDY'S VERIFICATION FOR ZACH JOHNSON'S VERIFICATION; CONFERENCE CALL WITH KENT AND TODD TO DISCUSS STRATEGY; TELEPHONE CONFERENCE WITH TODD TO DISCUSS	2.50	1125.00
749664	H	12/27/18	308	REVIEW OF CORRESPONDENCE FROM ZACH JOHNSON ON DISCOVERY REQUESTS; CORRESPONDENCE TO PHIL KREITLEIN RE: TAHOE APPRAISAL; REVIEW OF KENT RE: REVIEW AND REVISE MOTION IN LIMINE ON LEGAL EXPERTS.	1.75	787.50
749902	H	12/28/18	308	DICTATE PORTION OF MEDIATION STATEMENT PERTAINING TO SETTLEMENT CONCEPTS; REVIEW AND REVISE MEDIATION STATEMENT; TELEPHONE CONFERENCE WITH TODD RE:	2.50	1125.00
749906	H	12/29/18	308	REVIEW OF KEVIN RILEY BALANCE SHEETS; REVIEW AND REVISE REBUTTAL EXPERT DISCLOSURES. REVIEW OF MEDIATION STATEMENT; REVIEW OF LETTER FROM KENT ON	0.50	225.00
750035	H	12/31/18	308	REVIEW OF WENDY'S PROTOCOL STATEMENT; REVIEW OF KEVIN RILEY SETTLEMENT HYPOTHETICALS; CORRESPONDENCE TO PHIL KREITLEIN RE: JACKRABBIT CAPITAL CASE; CORRESPONDENCE TO MIKE KIMMEL RE:	1.75	787.50
750296	H	01/01/19	308	MEETING AT KENT ROBISON'S OFFICE.	0.65	292.50
750299	H	01/02/19	308	MEDIATION WITH BOB ENZENBERGER AND	3.00	1350.00

#	Type	Date	Atty	Description	Hours	Amount
750302	H	01/03/19	308	ALL PARTIES. MEDIATION WITH BOB ENZENBERGER AND ALL PARTIES.	3.00	1350.00
750305	H	01/04/19	308	DEPOSITION OF KEVIN RILEY.	3.00	1350.00
750308	H	01/05/19	308	FINAL DAY OF DEPOSITION OF KEVIN RILEY.	2.00	900.00
750583	H	01/07/19	308	REVIEW OF CORRESPONDENCE FROM KEVIN RE: [REDACTED] [REDACTED] REVIEW OF RECOMMENDATION AND ORDER; REVIEW OF NICK PALMER OBJECTIONS TO SUBPOENA; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.00	450.00
750590	H	01/08/19	308	REVIEW OF CORRESPONDENCE FROM OPPOSING PARTY ON 30(b)(6); TELEPHONE CONFERENCE WITH CAROLYN RENNER RE: [REDACTED]	0.75	337.50
750778	H	01/09/19	308	REVIEW OF LIST FROM KENT ON [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD AND KEVIN RE: [REDACTED] [REDACTED] CONTINUES REVIEW OF EXHIBITS FOR TRIAL PREPARATION.	1.75	787.50
750785	H	01/10/19	308	ATTEND MEETING WITH TODD, ADAM AND STAN TO DISCUSS SETTLEMENT; TELEPHONE CONFERENCE WITH KEVIN TO DISCUSS [REDACTED]	2.00	900.00
750899	H	01/11/19	308	TELEPHONE CONFERENCE WITH TODD AND KENT RE: [REDACTED] [REDACTED] MEETING WITH TODD AND STAN RE: SETTLEMENT; CONFERENCE WITH KEVIN TO DISCUSS [REDACTED]	3.00	1350.00
751052	H	01/14/19	308	TELEPHONE CONFERENCE WITH BOB ENZENBERGER RE: SETTLEMENT; ATTEND DEPOSITION OF NANETTE CHILDER; TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED] REVIEW OF EXPERT REPORT TO PREPARE FOR DEPOSITION.	2.00	900.00
751336	H	01/15/19	308	ATTEND AND TAKE DEPOSITION OF ACCOUNTING EXPERT; TELEPHONE CONFERENCE WITH KEVIN RILEY TO DISCUSS [REDACTED] CONFERENCE CALL WITH ADAM, PHIL, STAN, KEVIN AND TODD; ATTEND DISCOVERY COMMISSIONER HEARING; REVIEW OF ORDER ISSUED BY THE COURT ON MIKE KIMMEL.	3.00	1350.00
751509	H	01/16/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] [REDACTED]	2.00	900.00

#	Type	Date	Atty	Description	Hours	Amount
751516	H	01/17/19	308	TELEPHONE CONFERENCE WITH KENT TO DISCUSS [REDACTED]	3.00	1350.00
751885	H	01/18/19	308	ATTEND DEPOSITION OF GARY STOLBACH. REVIEW OF DISCOVERY STATUS REPORT; REVIEW OF DOCUMENTS PROVIDED BY KEVIN RILEY; TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED]	3.00	1350.00
751894	H	01/21/19	308	REVIEW OF DEAL POINTS FROM STAN AND TELEPHONE CONFERENCE WITH ADAM; REVIEW OF DEAL POINTS WITH TODD. ATTEND DEPOSITION OF BOB LEGOY; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	2.00	900.00
752521	H	01/22/19	308	ATTEND DISCOVERY CONFERENCE WITH ALL PARTIES AND COMMISSIONER AYERS.	2.00	900.00
752524	H	01/23/19	308	ATTEND DEPOSITION OF BRUCE WALLACE.	2.00	900.00
752528	H	01/24/19	308	ATTEND DEPOSITION OF BRIAN MCQUAID.	3.00	1350.00
752535	H	01/25/19	308	TELEPHONE CONFERENCE WITH KEVIN HARDUNG RE: [REDACTED] CONFERENCE WITH KENT AND TODD TO DISCUSS [REDACTED] CONFERENCE CALL WITH ALL PARTIES AND JUDGE HARDY RE: DOCUMENTS; PREPARE SUPPLEMENTAL DISCLOSURES FOR KEVIN.	2.00	900.00
752538	H	01/26/19	308	TRIAL PREPARATION AND CONTINUED REVIEW OF TRIAL EXHIBITS.	2.00	900.00
752542	H	01/28/19	308	ATTEND DEPOSITION OF HANDWRITING EXPERT; MEETING WITH KENT AND TODD; CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED]	3.00	1350.00
752546	H	01/29/19	308	TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: TRIAL ISSUES; TELEPHONE CONFERENCE WITH KENT AND TODD RE: [REDACTED] ATTEND SETTLEMENT CONFERENCE WITH TODD, BOB ENZENBERGER AND STAN; CORRESPONDENCE TO MILE KIMMEL RE: [REDACTED] ATTEND HEARING WITH DISCOVERY COMMISSIONER.	3.00	1350.00
752624	H	01/30/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW AND REVISE DRAFT SETTLEMENT; TELEPHONE CONFERENCE WITH ADAM RE: SETTLEMENT TERMS; TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED] CONTINUED TRIAL PREP; REVIEW OF ORDER DENYING MOTION TO STRIKE.	3.00	1350.00
752992	H	01/31/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CONFERENCE CALL WITH STAN, ADAM, PHIL AND TODD TO	2.75	1237.50

#	Type	Date	Atty	Description	Hours	Amount
				██████████ FINAL REVIEW OF SETTLEMENT AGREEMENT FOR EXECUTION BY ALL PARTIES; CORRESPONDENCE TO KEVIN RILEY RE: ██████████ REVIEW AND REVISE INFORMED CONSENT WAIVER DOCUMENT.		
752998	H	02/01/19	308	ATTEND DEPOSITION OF TODD JAKSICK AND NICOLAS PALMER; MEETING WITH KENT AND TODD.	4.00	1800.00
753001	H	02/02/19	308	TRIAL PREPARATION- PREPARE OPENING STATEMENT; BEGIN PREPARATION FOR TRIAL STATEMENT; REVIEW OF MOTION TO CONTINUE TRIAL; PREPARE JURY QUESTIONS.	2.00	900.00
753004	H	02/03/19	308	TRIAL PREPARATION.	1.75	787.50
753334	H	02/04/19	308	ATTEND PRETRIAL WITH JUDGE HARDY AND ALL COUNSEL; CONTINUED TRIAL PREPARATION.	3.00	1350.00
753337	H	02/05/19	308	ATTEND PRETRIAL CONFERENCE AND SETTLEMENT DISCUSSIONS WITH BOB ENZENBERGER.	3.00	1350.00
753447	H	02/06/19	308	TELEPHONE CONFERENCE WITH TODD RE: ██████████ TELEPHONE CONFERENCE WITH KEVIN RE: ██████████ TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: ██████████	1.75	787.50
753479	H	02/07/19	308	TELEPHONE CONFERENCE WITH TODD RE: ██████████ TELEPHONE CONFERENCE WITH KENT RE: ██████████ CORRESPONDENCE TO ADAM RE: ██████████ REVIEW OF KEVIN RILEY'S ORDER ON ACCOUNTING; CONFERENCE WITH ADAM TO DISCUSS SETTLEMENT; CONFERENCE WITH KENT. CONTINUED TRIAL PREPARATION; TELEPHONE CONFERENCE WITH TODD AND KENT RE: ██████████ ATTEND HEARING BEFORE DISCOVERY COMMISSIONER; REVIEW OF SUBTRUST ACCOUNTING AND CORRESPONDENCE FROM KEVIN.	3.00	1350.00
753598	H	02/08/19	308	TELEPHONE CONFERENCE WITH TODD AND KENT RE: ██████████ ATTEND HEARING BEFORE DISCOVERY COMMISSIONER; REVIEW OF SUBTRUST ACCOUNTING AND CORRESPONDENCE FROM KEVIN.	2.25	1012.50
753623	H	02/09/19	308	TRIAL PREPARATION.	2.00	900.00
753626	H	02/10/19	308	TRIAL PREPARATION.	1.00	450.00
753691	H	02/11/19	308	REVIEW OF CORRESPONDENCE FROM KENT RE: ██████████ CORRESPONDENCE TO KEVIN RE: ██████████ TELEPHONE CONFERENCE WITH PHIL RE:	5.00	2250.00

#	Type	Date	Atty	Description	Hours	Amount
753858	H	02/12/19	308	STATUS OF TRIAL; PREPARE SUPPLEMENTAL DISCLOSURE FOR DISCLOSURE OF WENDY'S SUBTRUST FINANCIALS; CORRESPONDENCE TO TODD, KEVIN, AND MIKE RE: TRIAL ISSUES; CONTINUED TRIAL PREPARATION. CONTINUED TRIAL PREPARATION; CONFERENCE CALL WITH TODD AND KENT TO REVIEW [REDACTED] TELEPHONE CONFERENCE WITH KEVIN TO REVIEW [REDACTED]	5.00	2250.00
754248	H	02/13/19	308	PRETRIAL CONFERENCE WITH ALL PARTIES AND CONTINUED ARGUMENTS OVER MOTION IN LIMINE; CONTINUED TRIAL PREPARATION.	5.00	2250.00
754251	H	02/14/19	308	PICK JURY BEFORE JUDGE HARDY.	5.00	2250.00
754254	H	02/15/19	308	PREPARE OPENING ARGUMENT; OPENING ARGUMENTS BEFORE JUDGE.	5.00	2250.00
754259	H	02/16/19	308	TELEPHONE CONFERENCE WITH TODD; CONTINUED TRIAL PREPARATION.	2.00	900.00
754261	H	02/18/19	308	CONFERENCE CALL WITH TODD AND KENT TO REVIEW [REDACTED] REVIEW OF EMAIL FROM ADAM RE: [REDACTED] CONTINUED TRIAL PREPARATION.	2.75	1237.50
754670	H	02/19/19	308	ATTEND TRIAL.	4.00	1800.00
754674	H	02/20/19	308	ATTEND TRIAL.	4.00	1800.00
754682	H	02/21/19	308	ATTEND TRIAL. MEETING WITH TODD, KENT AND PIERRE.	4.00	1800.00
754686	H	02/22/19	308	ATTEND TRIAL.	4.00	1800.00
755244	H	02/23/19	308	TRIAL PREPARATION.	2.00	900.00
754695	H	02/24/19	308	PREPARE DIRECT EXAM FOR KEVIN RILEY; TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED] MEETING WITH KENT AND PIERRE.	3.00	1350.00
755247	H	02/24/19	308	TRIAL PREPARATION. MEETING WITH PIERRE HASCHEFF.	2.00	900.00
755253	H	02/25/19	308	ATTEND TRIAL.	5.00	2250.00
755256	H	02/26/19	308	ATTEND TRIAL.	5.00	2250.00
755259	H	02/27/19	308	ATTEND TRIAL.	5.00	2250.00
755262	H	02/28/19	308	ATTEND TRIAL.	5.00	2250.00
755266	H	03/01/19	308	ATTEND TRIAL.	3.00	1350.00
755628	H	03/02/19	308	PREPARE FOR CLOSING ARGUMENT.	1.00	450.00
755631	H	03/03/19	308	PREPARE FOR CLOSING ARGUMENT.	1.00	450.00
755634	H	03/04/19	308	ATTEND TRIAL; RETURN OF JURY VERDICT.	5.00	2250.00
755956	H	03/06/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH KENT RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] CORRESPONDENCE TO	2.00	900.00

#	Type	Date	Atty	Description	Hours	Amount
				PHIL KREITLEIN RE: [REDACTED]		
755965	H	03/07/19	308	REVIEW OF CORRESPONDENCE FROM PHIL KREITLEIN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH KENT RE: [REDACTED]	0.75	337.50
755973	H	03/07/19	308	REVIEW AND REVISE MEMORANDUM OF COSTS; CORRESPONDENCE TO KENT RE: [REDACTED]	1.00	450.00
756253	H	03/11/19	308	TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: [REDACTED] FINAL REVIEW OF COST MEMORANDUM FOR FILING; MEETING WITH MIKE KIMMEL AND TODD JAKSICK TO DISCUSS [REDACTED]	1.00	450.00
756261	H	03/12/19	308	REVIEW OF CORRESPONDENCE FROM ADAM RE: [REDACTED] CORRESPONDENCE TO TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH KENT RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.00	450.00
756378	H	03/13/19	308	TELEPHONE CONFERENCE WITH KENT RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.75	337.50
756510	H	03/15/19	308	REVIEW OF MOTION TO RETAX COSTS; MEETING WITH STAN AND TODD TO DISCUSS [REDACTED]	1.75	787.50
756838	H	03/18/19	308	REVIEW OF EMAIL FROM KEVIN RILEY RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] LETTER TO TODD RE: [REDACTED] [REDACTED] MEETING WITH KENT AND TODD TO DISCUSS [REDACTED]	2.00	900.00
756985	H	03/19/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED] CORRESPONDENCE TO PHIL AND ADAM RE: [REDACTED] DICTATE RESPONSE TO ZACH JOHNSON LETTER REQUESTING TODD RESIGN AS TRUSTEE; CONFERENCE CALL WITH TRUSTEES RE: [REDACTED]	1.75	787.50
757142	H	03/20/19	308	FINALIZE LETTER TO ZACH JOHNSON; CORRESPONDENCE TO PHIL KREITLEIN RE: [REDACTED]	0.75	337.50
757375	H	03/21/19	308	REVIEW OF CORRESPONDENCE FROM ADAM	1.00	450.00

#	Type	Date	Atty	Description	Hours	Amount
				ON [REDACTED] CORRESPONDENCE TO ADAM AND PHIL [REDACTED] CORRESPONDENCE TO ADAM RE: [REDACTED]		
757379	H	03/22/19	308	REVIEW OF CORRESPONDENCE FROM ADAM RE: [REDACTED] TELEPHONE CONFERENCE WITH ADAM RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM PHIL RE: [REDACTED] CORRESPONDENCE TO PHIL RE: [REDACTED]	1.00	450.00
757546	H	03/25/19	308	CONFERENCE RE: [REDACTED] [REDACTED] REVIEW AND REVISE MOTION FOR ATTORNEY'S FEES; REVIEW OF CORRESPONDENCE FROM ADAM RE: [REDACTED] REVIEW OF CORRESPONDENCE FORM KEVIN RE: [REDACTED]	1.00	450.00
757695	H	03/27/19	308	REVIEW OF CORRESPONDENCE FROM MIKE KIMMEL RE: [REDACTED]	0.50	225.00
757760	H	03/28/19	308	REVIEW OF STAN'S EMAIL TO KEVIN RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM MIKE KIMMEL TO CO-TRUSTEES; REVIEW OF CORRESPONDENCE FROM KENT TO COUNSEL FOR PIERRE HASCHEFF.	0.75	337.50
757855	H	03/29/19	308	REVIEW OF CORRESPONDENCE FORM MIKE KIMMEL TO CO-TRUSTEES.	0.50	225.00
758213	H	04/01/19	308	REVIEW OF CORRESPONDENCE FROM ADAM RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	0.75	337.50
758340	H	04/02/19	308	REVIEW OF EMAIL FROM MIKE KIMMEL TO ALL TRUSTEES; TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED]	0.50	225.00
758515	H	04/04/19	308	TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: [REDACTED] [REDACTED] CORRESPONDENCE TO ADAM RE: [REDACTED] [REDACTED] CORRESPONDENCE RE: [REDACTED]	1.00	450.00
758549	H	04/05/19	308	CORRESPONDENCE TO ADAM AND PHIL RE: [REDACTED]	0.25	112.50

#	Type	Date	Atty	Description	Hours	Amount
758729	H	04/08/19	308	REVIEW OF EMAIL FROM PHIL KREITLEIN RE: [REDACTED]	0.75	337.50
758828	H	04/09/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO PHIL RE: [REDACTED] [REDACTED] MEETING WITH TODD AND KENT TO DISCUSS UPCOMING TRIAL; TELEPHONE CONFERENCE WITH MIKE KIMMEL TO DISCUSS TRIAL ISSUES.	2.00	900.00
758925	H	04/10/19	308	REVIEW OF KEVIN RILEY [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO TODD RE: [REDACTED] [REDACTED]	1.50	675.00
759060	H	04/11/19	308	CONFERENCE CALL WITH MIKE AND TODD RE: [REDACTED]	1.00	450.00
759161	H	04/12/19	308	TELEPHONE CONFERENCE WITH TODD AND MIKE RE: [REDACTED] [REDACTED] CORRESPONDENCE TO ADAM AND PHIL RE: [REDACTED]	1.00	450.00
759340	H	04/15/19	308	TELEPHONE CONFERENCE WITH PHIL KREITLEIN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED]	0.75	337.50
759564	H	04/16/19	308	CORRESPONDENCE TO ADAM AND PHIL RE: [REDACTED]	0.25	112.50
759730	H	04/17/19	308	REVIEW OF JOINT MOTION FOR STATUS CONFERENCE AND CORRESPONDENCE TO KENT RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] REVIEW OF COURT ORDER ON CLAIMS TO BE HEARD BY COURT; TELEPHONE CONFERENCE WITH KENT RE: [REDACTED]	2.75	1237.50
759789	H	04/18/19	308	REVIEW OF CORRESPONDENCE FROM PHIL KREITLEIN RE: [REDACTED] CORRESPONDENCE TO PHIL RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW [REDACTED] PREPARED BY KEVIN RILEY; REVIEW OF CORRESPONDENCE FROM STAN TO CO TRUSTEES RE: [REDACTED]	2.50	1125.00
759866	H	04/19/19	308	REVIEW OF MOTION IN LIMINE/ SUMMARY JUDGMENT FILED BY KENT ROBISON; PREPARE JOINDER TO MOTION; CORRESPONDENCE TO ADAM AND PHIL RE: [REDACTED]	0.75	337.50

#	Type	Date	Atty	Description	Hours	Amount
760148	H	04/22/19	308	CORRESPONDENCE TO ADAM AND PHIL RE: [REDACTED] REVIEW OF EMAIL FROM TODD RE: [REDACTED]	0.75	337.50
760230	H	04/23/19	308	REVIEW OF CORRESPONDENCE FROM ADAM HOSMER-JENNER RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] CONFERENCE CALL WITH TRUSTEES RE: [REDACTED]	2.00	900.00
760369	H	04/24/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] REVIEW OF MIKE KIMMEL EMIAL TO STAN.	0.75	337.50
760422	H	04/25/19	308	CONFERENCE WITH BOB RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.75	337.50
760653	H	04/29/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	1.00	450.00
761161	H	05/01/19	308	CORRESPONDENCE TO PHIL RE: [REDACTED] [REDACTED] CORRESPONDENCE TO MIKE AND TODD RE: [REDACTED] [REDACTED] REVIEW OF OPPOSITION TO JOINDER FILED BY WENDY; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	2.25	1012.50
761281	H	05/02/19	308	ATTEND STATUS CONFERENCE WITH JUDGE HARDY AND ALL PARTIES; MEETING WITH KENT TO DISCUSS [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	3.25	1462.50
761357	H	05/03/19	308	CORRESPONDENCE TO MIKE AND TODD RE: [REDACTED] [REDACTED] REVIEW OF COURT PRETRIAL ORDER ON EQUITABLE CLAIMS; REVIEW OF EXHIBIT LIST TO DETERMINE RELEVANT EXHIBITS FOR TRIAL.	2.50	1125.00
761466	H	05/06/19	308	BEGIN PREPARATION FOR TRIAL ON EQUITABLE ISSUES; TELEPHONE CONFERENCE WITH PHIL KREITTEIN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD AND JESSICA RE: [REDACTED]	2.75	1237.50
761500	H	05/07/19	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED]	4.00	1800.00

#	Type	Date	Atty	Description	Hours	Amount
761503	H	05/08/19	308	REVIEW AND REVISE TRIAL STATEMENTS; DRAFT OFFER TO WENDY FOR TODD'S REVIEW; REVIEW AND REVISE TRIAL STATEMENT; MEETING WITH TODD AND KENT. PREPARE OFFER TO WENDY AND CORRESPONDENCE TO ADAM AND PHIL; TELEPHONE CONFERENCE WITH TODD RE: CORRESPONDENCE TO MARK CONNOT RE: TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CONTINUED TRIAL PREPARATION. REVIEW AND REVISE TRIAL STATEMENT; REVIEW OF NEW EXHIBITS IDENTIFIED FOR TRIAL; CONTINUED TRIAL PREPARATION; REVIEW OF CORRESPONDENCE FROM ADAM ON CORRESPONDENCE TO ALL TRUSTEES RE: TELEPHONE CONFERENCE WITH TODD. TELEPHONE CONFERENCE WITH KENT TO DISCUSS REVIEW OF SUPPLEMENTAL PETITION FILED BY WENDY; ONGOING TRIAL PREPARATION. FIRST DAY OF TRIAL WITH JUDGE HARDY ON EQUITABLE ISSUES; MEETING WITH KENT AND TODD TO DISCUSS REVIEW OF OFFER FROM CONNOT AND RESPOND TO OFFER. TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CORRESPONDENCE TO TODD RE: CORRESPONDENCE TO TRUSTEES RE: REVIEW OF RILEY CHANGES TO STIPULATION; REVIEW OF EXHIBIT LIST TO ENSURE ALL DOCUMENTS ADMITTED. TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	4.25	1912.50
761536	H	05/09/19	308	CONTINUED TRIAL PREPARATION. REVIEW AND REVISE TRIAL STATEMENT; REVIEW OF NEW EXHIBITS IDENTIFIED FOR TRIAL; CONTINUED TRIAL PREPARATION; REVIEW OF CORRESPONDENCE FROM ADAM ON CORRESPONDENCE TO ALL TRUSTEES RE: TELEPHONE CONFERENCE WITH TODD. TELEPHONE CONFERENCE WITH KENT TO DISCUSS REVIEW OF SUPPLEMENTAL PETITION FILED BY WENDY; ONGOING TRIAL PREPARATION. FIRST DAY OF TRIAL WITH JUDGE HARDY ON EQUITABLE ISSUES; MEETING WITH KENT AND TODD TO DISCUSS REVIEW OF OFFER FROM CONNOT AND RESPOND TO OFFER. TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CORRESPONDENCE TO TODD RE: CORRESPONDENCE TO TRUSTEES RE: REVIEW OF RILEY CHANGES TO STIPULATION; REVIEW OF EXHIBIT LIST TO ENSURE ALL DOCUMENTS ADMITTED. TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	5.00	2250.00
761673	H	05/10/19	308	TELEPHONE CONFERENCE WITH TODD. TELEPHONE CONFERENCE WITH KENT TO DISCUSS REVIEW OF SUPPLEMENTAL PETITION FILED BY WENDY; ONGOING TRIAL PREPARATION. FIRST DAY OF TRIAL WITH JUDGE HARDY ON EQUITABLE ISSUES; MEETING WITH KENT AND TODD TO DISCUSS REVIEW OF OFFER FROM CONNOT AND RESPOND TO OFFER. TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CORRESPONDENCE TO TODD RE: CORRESPONDENCE TO TRUSTEES RE: REVIEW OF RILEY CHANGES TO STIPULATION; REVIEW OF EXHIBIT LIST TO ENSURE ALL DOCUMENTS ADMITTED. TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	5.00	2250.00
761678	H	05/13/19	308	TELEPHONE CONFERENCE WITH TODD. TELEPHONE CONFERENCE WITH KENT TO DISCUSS REVIEW OF SUPPLEMENTAL PETITION FILED BY WENDY; ONGOING TRIAL PREPARATION. FIRST DAY OF TRIAL WITH JUDGE HARDY ON EQUITABLE ISSUES; MEETING WITH KENT AND TODD TO DISCUSS REVIEW OF OFFER FROM CONNOT AND RESPOND TO OFFER. TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CORRESPONDENCE TO TODD RE: CORRESPONDENCE TO TRUSTEES RE: REVIEW OF RILEY CHANGES TO STIPULATION; REVIEW OF EXHIBIT LIST TO ENSURE ALL DOCUMENTS ADMITTED. TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	5.00	2250.00
762033	H	05/14/19	308	TELEPHONE CONFERENCE WITH TODD. TELEPHONE CONFERENCE WITH KENT TO DISCUSS REVIEW OF SUPPLEMENTAL PETITION FILED BY WENDY; ONGOING TRIAL PREPARATION. FIRST DAY OF TRIAL WITH JUDGE HARDY ON EQUITABLE ISSUES; MEETING WITH KENT AND TODD TO DISCUSS REVIEW OF OFFER FROM CONNOT AND RESPOND TO OFFER. TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: CORRESPONDENCE TO TODD RE: CORRESPONDENCE TO TRUSTEES RE: REVIEW OF RILEY CHANGES TO STIPULATION; REVIEW OF EXHIBIT LIST TO ENSURE ALL DOCUMENTS ADMITTED. TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	3.00	1350.00
762302	H	05/15/19	308	TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	1.00	450.00
762426	H	05/16/19	308	TELEPHONE CONFERENCE WITH TODD RE: TELEPHONE CONFERENCE WITH JOEL AT DMV; CORRESPONDENCE TO MIKE RE: REVIEW AND REVISE OBJECTIONS TO OFFER OF PROOF; TELEPHONE CONFERENCE WITH TODD RE: REVIEW OF CORRESPONDENCE FROM KENT TO JUDGE HARDY. REVIEW OF STAN'S OBJECTIONS TO	1.75	787.50
762466	H	05/17/19	308	REVIEW OF STAN'S OBJECTIONS TO	3.00	1350.00

#	Type	Date	Atty	Description	Hours	Amount
762739	H	05/20/19	308	SETTLEMENT AGREEMENT; MEETING WITH TODD AND MIKE RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH KEVIN RE: [REDACTED] REVIEW OF ORDER ON EVIDENCE; MEETING WITH TODD AND KENT TO DISCUSS [REDACTED] TELEPHONE CONFERENCE TO PHIL RE: [REDACTED]	3.00	1350.00
762804	H	05/21/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF PROPOSED LANGUAGE FOR FINANCIALS; REVIEW OF CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] [REDACTED] REVIEW OF TEXT MESSAGES FROM WENDY.	1.00	450.00
762880	H	05/22/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM PHIL; MEETING WITH TODD AND MIKE TO DISCUSS [REDACTED]	2.00	900.00
762977	H	05/22/19	308	CONFERENCE CALL WITH PHIL AND ADAM RE: [REDACTED] CONFERENCE CALL WITH MIKE AND TODD RE: [REDACTED]	3.00	1350.00
763152	H	05/24/19	308	REVIEW OF CORRESPONDENCE FROM ADAM RE: [REDACTED] CORRESPONDENCE TO ADAM RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM MIKE KIMMEL TO KEVIN RILEY RE: [REDACTED] [REDACTED] REVIEW OF CORRESPONDENCE FROM KEVIN TO MIKE RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL.	2.50	1125.00
763278	H	05/28/19	308	REVIEW OF CORRESPONDENCE FROM ZACH JOHNSON ON BRIEFING DATE; REVIEW OF CORRESPONDENCE FROM TODD ON [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.00	450.00
763346	H	05/29/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH PHIL RE: [REDACTED] [REDACTED]	1.00	450.00
763465	H	05/30/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] MEETING WITH PHIL AND STAN RE: [REDACTED] CORRESPONDENCE TO MARK CONNOT AND	2.25	1012.50

#	Type	Date	Atty	Description	Hours	Amount
763773	H	06/03/19	308	ZACH JOHNSON RE: STAND-DOWN AGREEMENT. REVIEW OF CORRESPONDENCE FROM BOB ENZENBERGER RE: MEDIATION; CORRESPONDENCE TO BOB RE: DETAILS; TELEPHONE CONFERENCE WITH KENT AND TODD RE: [REDACTED]	1.00	450.00
763868	H	06/04/19	308	REVIEW OF CORRESPONDENCE FROM MARK CONNOT RE: MEDIATION ISSUES; CORRESPONDENCE TO TODD AND MIKE RE: [REDACTED] [REDACTED] REVIEW AND REVISE REPLY TO OPPOSITION TO MOTION TO STRIKE.	1.75	787.50
764008	H	06/05/19	308	MEETING WITH CO-TRUSTEES RE: [REDACTED] [REDACTED] CORRESPONDENCE TO PHIL RE: [REDACTED]	2.75	1237.50
764016	H	06/06/19	308	REVIEW OF DEMANDS FOR MDG AND TOIYABE PREPARED BY TRUSTEES; REVIEW OF CORRESPONDENCE FROM PHIL RE: [REDACTED]	1.00	450.00
764066	H	06/07/19	308	TELEPHONE CONFERENCE WITH NIC PALMER RE: INCLINE TSS ISSUES; CORRESPONDENCE TO OPPOSING COUNSEL RE: STAND DOWN AND 10K CHECK.	0.75	337.50
764823	H	06/17/19	308	REVIEW OF EMAIL FROM CONNOT RE: STANDDOWN AGREEMENT; REVIEW AND REVISE BRIEF ON EQUITABLE CLAIMS; CONFERENCE CALL WITH TODD AND MIKE.	1.50	675.00
765041	H	06/18/19	308	REVIEW OF PROPOSED CHANGES AND ADDITIONS TO BRIEF; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.75	337.50
765218	H	06/19/19	308	CONFERENCE CALL WITH TODD JAKSICK AND JESSICA CLAYTON; REVIEW AND REVISE BRIEF; DICTATE OPPOSITION TO EMERGENCY MOTION; TELEPHONE CONFERENCE WITH TODD AND MIKE RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED]	4.25	1912.50
765913	H	06/21/19	308	TELEPHONE CONFERENCE WITH TODD AND MIKE RE: [REDACTED]	0.50	225.00
766014	H	06/27/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] CORRESPONDENCE TO KEVIN RILEY RE: [REDACTED] [REDACTED] CONFERENCE CALL WITH TODD AND MIKE RE: [REDACTED]	3.25	1462.50
766067	H	06/28/19	308	REVIE OF ORDER ON BRIEFING	1.00	450.00

#	Type	Date	Atty	Description	Hours	Amount
766310	H	07/01/19	308	SCHEDULE; FINAL REVIEW OF BRIEF ON EQUITABLE ISSUES; TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM ADAM HOSMER TO MIKE KIMMEL; TELEPHONE CONFERENCE WITH TODD AND MIKE RE: [REDACTED] REVIEW AND FINAIZE TRIAL BRIEF.	3.25	1462.50
766437	H	07/02/19	308	CONFERENCE CALL WITH TODD AND MIKE TO DISCUSS [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH PHIL KREITLEIN REGARDING [REDACTED] [REDACTED] REVIEW OF BRIEFS FILED BY ALL PARTIES.	3.50	1575.00
766466	H	07/03/19	308	CONFERENCE CALL WITH ADAM AND PHIL AND BOB RE: [REDACTED] [REDACTED] REVIEW OF ORDER FROM COURT RE: ABEYANCE OF MOTIONS TO STRIKE.	1.75	787.50
766899	H	07/09/19	308	MEETING WITH TODD AND KENT TO DISCUSS [REDACTED]	1.75	787.50
766901	H	07/10/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	0.50	225.00
767478	H	07/15/19	308	TELEPHONE CONFERENCE WITH TODD REGARDING [REDACTED] CONFERENCE CALL WITH TODD AND MIKE RE: [REDACTED]	1.50	675.00
767655	H	07/16/19	308	REVIEW OF CORRESPONDENCE FROM TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED] CONTINUED CALL WITH MIKE AND TODD RE: [REDACTED]	2.00	900.00
767664	H	07/17/19	308	TELEPHONE CONFERENCE WITH KEVIN RILEY; REVIEW OF PROPOSED EMAIL FROM MIKE KIMMEL TO LUKE, LEXI AND WENDY; TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED] REVIEW OF WENDY'S POST TRIAL BRIEF AND CONFERENCE WITH KRISTEN REGARDING [REDACTED]	3.75	1687.50
768177	H	07/22/19	308	CONFERENCE CALL WITH MIKE AND BOB RE: [REDACTED] CORRESPONDENCE TO ALL TRUSTEES RE: [REDACTED]	1.00	450.00

#	Type	Date	Atty	Description	Hours	Amount
768182	H	07/23/19	308	REVIEW OF CORRESPONDENCE FROM MIKE KIMMEL RE: [REDACTED]	0.50	225.00
768361	H	07/25/19	308	REVIEW OF ORDER ISSUED BY THE COURT ON REDACTION AND ORDER SHORTENING TIME; REVIEW AND REVISE REPLY BRIEF; CONFERENCE WITH KRISTEN AND CAROLYN TO [REDACTED]	3.00	1350.00
768664	H	07/29/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL TO [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] COURT CALL WITH MIKE AND TODD TO DISCUSS [REDACTED]	3.00	1350.00
768681	H	07/30/19	308	REVIEW OF CORRESPONDENCE FROM INSURANCE COMPANY RE: PAYMENT FOR REPLACEMENT COST; TELEPHONE CONFERENCE WITH TODD AND JESS RE: [REDACTED]	1.00	450.00
768688	H	07/30/19	308	REVIEW OF CORRESPONDENCE FROM OPPOSING COUNSEL RE: DEPOSITION. TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.00	450.00
768704	H	07/31/19	308	REVIEW OF PROPOSED AGENDA FOR MEETING AND CORRESPONDENCE TO MIKE KIMMEL. FIND REVIEW OF BRIEF; REVIEW AND REVISE SAR AND CORRESPONDENCE TO KEVIN RILEY; TELEPHONE CONFERENCE WITH TODD AND MIKE TO DISCUSS [REDACTED]	3.25	1462.50
768922	H	08/01/19	308	TELEPHONE CONFERENCE WITH KEVIN RILEY RE: [REDACTED]	0.25	112.50
768927	H	08/02/19	308	REVIEW AND REVISE OPPOSITION TO COMPEL DISTRIBUTION; FINAL REVISED FOR FINAL WITH COURT.	1.00	450.00
769492	H	08/07/19	308	REVIEW OF EMAILS FROM KIMMEL ON [REDACTED]	0.75	337.50
769861	H	08/09/19	308	CONFERENCE CALL WITH TODD AND MIKE TO DISCUSS [REDACTED]	1.00	450.00
769875	H	08/12/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED]	0.75	337.50
770010	H	08/13/19	308	CORRESPONDENCE TO ADAM RE: [REDACTED] CONFERENCE WITH MIKE AND TODD RE: [REDACTED]	2.25	1012.50

#	Type	Date	Atty	Description	Hours	Amount
				MEETING WITH TODD TO		
770636	H	08/20/19	308	TELEPHONE CONFERENCE WITH TODD AND MIKE RE:	0.75	337.50
770682	H	08/21/19	308	CORRESPONDENCE TO BOB ENZENBERGER RE: MEDIATION ; REVIEW OF CORRESPONDENCE FROM ADAM RE: CORRESPONDENCE TO TODD AND MIKE RE:	1.75	787.50
771014	H	08/22/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE:	0.75	337.50
771202	H	08/26/19	308	CORRESPONDENCE TO KENT RE:	0.50	225.00
771637	H	08/28/19	308	REVIEW AND REVISE MEDIATION STATEMENT; CORRESPONDENCE TO PHIL KREITLEIN RE:	1.75	787.50
771639	H	08/29/19	308	MEDIATION WITH ENZENBERGER AND STAN RE:	11.00	4950.00
771641	H	08/30/19	308	CORRESPONDENCE TO KEVIN RILEY REGARDING CONFERENCE CALL WITH TODD AND KENT.	1.00	450.00
772012	H	09/04/19	308	CORRESPONDENCE TO TRUSTEES RE: FAMILY TRUST ACCOUNTINGS.	0.50	225.00
772098	H	09/05/19	308	REVIEW AND REVISE PROPOSED ORDER REGARDING TITLE TO FERRARI. CORRESPONDENCE TO TODD RE:	3.00	1350.00
772366	H	09/06/19	308	CORRESPONDENCE TO TODD AND MIKE RE:	0.50	225.00
772371	H	09/09/19	308	TELEPHONE CONFERENCE WITH TODD RE: CORRESPONDENCE TO TRUSTEES RE:	0.75	337.50
772601	H	09/10/19	308	TELEPHONE CONFERENCE WITH KEVIN RE:	0.25	112.50
772715	H	09/11/19	308	TELEPHONE CONFERENCE WITH TODD RE:	0.50	225.00
772721	H	09/13/19	308	REVIEW OF ORDER FROM JUDGE HARDY ON EMERGENCY MOTION; CORRESPONDENCE TO TRUSTEES ON	0.75	337.50
773036	H	09/16/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL REGARDING REVIEW OF CORRESPONDENCE FROM STAN AND MIKE ON	0.75	337.50
773046	H	09/17/19	308	EMAIL CORRESPONDENCE TO KEVIN RE: CORRESPONDENCE TO TRUSTEES RE:	0.75	337.50
773089	H	09/18/19	308	REVIEW OF EMAIL FROM KEVIN RILEY	0.50	225.00

#	Type	Date	Atty	Description	Hours	Amount
				AND CORRESPONDENCE TO ALL TRUSTEES RE: [REDACTED]		
773207	H	09/19/19	308	CONFERENCE WITH STAN RE: [REDACTED]	0.25	112.50
773425	H	09/20/19	308	CORRESPONDENCE TO KEVIN RE: [REDACTED] [REDACTED] REVIEW	0.50	225.00
773430	H	09/23/19	308	OF CORRESPONDENCE FROM KEVIN REGARDING [REDACTED] CORRESPONDENCE TO TRUSTEES REGARDING [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	1.00	450.00
773462	H	09/24/19	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED] CONFERENCE WITH STAN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO TRUSTEES RE: [REDACTED] [REDACTED]	1.75	787.50
774222	H	09/25/19	308	MEETING WITH TODD, MIKE, AND BOB LEGOY TO DISCUSS [REDACTED] [REDACTED]	1.25	562.50
773825	H	09/26/19	308	CORRESPONDENCE TO TRUSTEES REGARDING [REDACTED] REVIEW OF EMAIL FROM KEVIN RILEY REGARDING [REDACTED]	0.75	337.50
774393	H	10/01/19	308	REVIEW OF PROPOSED EMAIL ON [REDACTED] PREPARED BY KIMMEL; TELEPHONE CONFERENCE WITH MIKE KIMMEL TO DISCUSS [REDACTED]	0.50	225.00
774397	H	10/02/19	308	CONFERENCE CALL WITH BOB LEGOY AND KEVIN RILEY REGARDING [REDACTED] [REDACTED] CORRESPONDENCE TO TRUSTEES REGARDING [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL REGARDING [REDACTED]	1.25	562.50
774597	H	10/03/19	308	CORRESPONDENCE TO PHIL KREITLIN. TELEPHONE CONFERENCE WITH TODD REGARDING [REDACTED] [REDACTED]	0.50	225.00
774691	H	10/04/19	308	REVIEW OF CORRESPONDENCE FROM ZACH JOHNSON RE: ACCOUNTING.	0.50	225.00
774700	H	10/08/19	308	CORRESPONDENCE TO ALL TRUSTEES REGARDING [REDACTED] [REDACTED] CORRESPONDENCE TO ALL TRUSTEES REGARDING [REDACTED]	1.00	450.00
774808	H	10/10/19	308	TELEPHONE CONFERENCE WITH TODD	0.75	337.50

#	Type	Date	Atty	Description	Hours	Amount
775176	H	10/14/19	308	[REDACTED] CORRESPONDENCE TO TRUSTEES REGARDING [REDACTED] CONFERENCE CALL WITH TRUSTEES TO DISCUSS [REDACTED] CORRESPONDENCE TO ADAM REGARDING [REDACTED]	2.00	900.00
775576	H	10/18/19	308	REVIEW AND REVISE CORRESPONDENCE TO ZACH JOHNSON REGARDING ACCOUNTING ISSUES.	0.75	337.50
775578	H	10/21/19	308	TELEPHONE CONFERENCE WITH KIMMEL RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM STAN JAKSICK.	0.75	337.50
776008	H	10/22/19	308	PREPARE EMAIL RESPONSE TO STAN ON [REDACTED] CONFERENCE CALL WITH BOB LEGOY RE: [REDACTED] [REDACTED]	1.00	450.00
776430	H	10/28/19	308	REVIEW OF EMAILS FROM STAN RE: [REDACTED] CONFERENCE CALL WITH TRUSTEES ON [REDACTED]	2.00	900.00
776434	H	10/30/19	308	REVIEW OF EMAIL FROM STAN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH ELI REGARDING TITLE TO FERRARI.	1.00	450.00
776634	H	11/01/19	308	REVIEW OF CORRESPONDENCE FROM TODD [REDACTED]	0.25	112.50
776957	H	11/04/19	308	REVIEW OF COURT ORDER ON TRANSCRIPTS; TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	0.75	337.50
777019	H	11/05/19	308	TELEPHONE CONFERENCE WITH ELI AT LITTLE BIRD ENTERPRISES; CORRESPONDENCE TO ALL TRUSTEES.	0.75	337.50
777130	H	11/06/19	308	CORRESPONDENCE TO STAN RE: [REDACTED] CORRESPONDENCE TO ADAM RE: [REDACTED] MEETING WITH, TODD AND KENT TO DISCUSS [REDACTED]	3.25	1462.50
777209	H	11/07/19	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED]	0.50	225.00
777406	H	11/08/19	308	CORRESPONDENCE TO ALL TRUSTEES RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	1.00	450.00
777655	H	11/13/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.50	225.00
778182	H	11/20/19	308	TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED]	0.75	337.50

#	Type	Date	Atty	Description	Hours	Amount
778308	H	11/21/19	308	REVIEW OF CORRESPONDENCE FROM TODD AND MIKE RE: [REDACTED]	0.25	112.50
778313	H	11/22/19	308	CONFERENCE CALL WITH MIKE AND TODD TO DISCUSS [REDACTED]	1.25	562.50
778802	H	12/02/19	308	REVIEW OF CORRESPONDENCE FROM STAN RE: [REDACTED]	0.50	225.00
779071	H	12/03/19	308	REVIEW OF CORRESPONDENCE RE: [REDACTED]	0.25	112.50
779365	H	12/06/19	308	REVIEW OF FERRARI TITLE ISSUE AND TELEPHONE CONFERENCE WITH DNN RE: ODOMETER INSPECTION.	0.75	337.50
779946	H	12/10/19	308	CONFERENCE WITH TRUSTEES TO DISCUSS [REDACTED] CONFERENCE WITH TODD TO DISCUSS [REDACTED]	2.00	900.00
779963	H	12/11/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	0.75	337.50
780422	H	12/17/19	308	REVIEW OF JACK RABBIT CAPITAL CALL INFORMATION.	0.75	337.50
780440	H	12/18/19	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] CORRESPONDENCE TO ZACH JOHNSON RE: PAYMENT OF STORAGE UNIT.	1.00	450.00
780605	H	12/19/19	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED]	0.50	225.00
780784	H	12/20/19	308	TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED]	0.50	225.00
781151	H	12/23/19	308	REVIEW OF CORRESPONDENCE FROM KEVIN RILEY RE: [REDACTED] CORRESPONDENCE TO TRUSTEES RE: [REDACTED]	0.75	337.50
781216	H	12/26/19	308	CONFERENCE CALL WITH KENT AND TODD RE: [REDACTED] REVIEW OF CORRESPONDENCE FROM BILL PETERSON RE: JACK RABBIT CAPITAL CALL; CORRESPONDENCE TO TRUSTEES RE: [REDACTED]	1.50	675.00
781251	H	12/27/19	308	REVIEW OF CORRESPONDENCE FROM KEVIN RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED]	1.75	787.50
781627	H	01/02/20	308	REVIEW OF CORRESPONDENCE FROM KENT RE: [REDACTED]	1.75	787.50

#	Type	Date	Atty	Description	Hours	Amount
				[REDACTED] CORRESPONDENCE TO TRUSTEES RE: [REDACTED]		
782184!	H	01/03/20	308	REVIEW OF BILL OF SALE FOR SALE OF FERRARI; CORRESPONDENCE TO TRUSTEES RE: [REDACTED] CORRESPONDENCE TO LITTLE BIRD RE: BILL OF SALE.	1.75	787.50
782190!	H	01/06/20	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] PREPARE AGENDA FOR TRUSTEE MEETING.	0.75	337.50
782192!	H	01/07/20	308	MEETING WITH KEVIN RILEY TO DISCUSS [REDACTED] REVIEW OF CORRESPONDENCE FROM WENDY RE: [REDACTED] REVIEW OF HART CAMP ADDENDUM AND EMAIL TO TODD.	1.50	675.00
782197!	H	01/08/20	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW AND REVISE BILL OF SALE; REVIEW OF FINANCIAL INFORMATION PROVIDED BY KEVIN.	1.25	562.50
782202!	H	01/09/20	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED] [REDACTED] CORRESPONDENCE TO LITTLE BYRD.	1.75	787.50
782210!	H	01/13/20	308	REVIEW OF CORRESPONDENCE FROM TODD RE: [REDACTED] CORRESPONDENCE TO TRUSTEES RE: [REDACTED]	1.00	450.00
782390!	H	01/14/20	308	CORRESPONDENCE TO LITTLE BYRD ENTERPRISE RE: FERRARI SALE; CONFERENCE WITH TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH LEE SMITH RE: APPRAISALS.	1.25	562.50
782691!	H	01/15/20	308	REVIEW OF INFORMATION FROM ELI ON VALUE OF FERRARI; CORRESPONDENCE TO TRUSTEES.	1.00	450.00
782695!	H	01/16/20	308	CORRESPONDENCE TO TRUSTEES RE: [REDACTED] [REDACTED] CORRESPONDENCE TO ELI RE: [REDACTED] REVIEW AND REVISE BILL OF SALE AND CORRESPONDENCE TO TRUSTEES RE: [REDACTED]	1.75	787.50
782699!	H	01/17/20	308	REVIEW OF EMAIL FROM ELI RE: W-9 AND CORRESPONDENCE TO KEVIN RE: [REDACTED] [REDACTED]	0.75	337.50
782962!	H	01/21/20	308	REVIEW OF CORRESPONDENCE FROM ELI ON FERRARI PURCHASE; REVIEW OF PROPOSED PURCHASE AGREEMENT;	2.00	900.00

#	Type	Date	Atty	Description	Hours	Amount
				TELEPHONE CONFERENCE WITH TODD AND EMAIL TO ALL TRUSTEES RE: [REDACTED]		
783280!	H	01/26/20	308	MEETING WITH TODD ON FERRARI TITLE; TELEPHONE CONFERENCE WITH ELI OF LITTLE BYRD ENTERPRISES.	1.00	450.00
783320!	H	01/28/20	308	MEETING WITH ELI RE: [REDACTED]	0.50	225.00
783749!	H	01/30/20	308	TELEPHONE CONFERENCE WITH LEE SMITH RE: APPRAISAL OF FARM AND MONTREUX PROPERTY; TELEPHONE CONFERENCE WITH KEVIN RILEY.	0.75	337.50
784818!	H	02/07/20	308	REVIEW OF EMERGENCY ORDER; CORRESPONDENCE TO TRUSTEES RE: [REDACTED] TELEPHONE CONFERENCE WITH MIKE KIMMEL AND MEETING WITH TODD.	1.75	787.50
784825!	H	02/10/20	308	CONFERENCE CALL WITH KENT, TODD AND KRISTEN RE: [REDACTED]	2.00	900.00
784852!	H	02/11/20	308	REVIEW OF TRIAL EXHIBITS TO FIND TESTIMONY FOR SUPPLEMENTAL BRIEF. CONFERENCE CALL WITH KRISTEN AND TODD TO DISCUSS [REDACTED]	2.00	900.00
784932!	H	02/12/20	308	[REDACTED] REVIEW AND REVISE BRIEF. REVIEW OF ACCOUNTING FOR SUPPLEMENTAL BRIEF.	1.00	450.00
785155!	H	02/13/20	308	REVIEW AND REVISE BRIEF.	1.00	450.00
785257!	H	02/18/20	308	FINAL REVIEW AND REVISIONS TO SUPPLEMENTAL BRIEF; TELEPHONE CONFERENCE WITH KENT RE: [REDACTED]	1.25	562.50
785313!	H	02/19/20	308	TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] REVIEW OF EMERGENCY MOTION; TELEPHONE CONFERENCE WITH KENT.	1.25	562.50
785507!	H	02/21/20	308	CONFERENCE CALL WITH MIKE AND TODD TO [REDACTED]	1.00	450.00
785770!	H	02/24/20	308	REVIEW OF PROPOSED EMAILS FROM KIMMEL TO KEVIN RE: [REDACTED] [REDACTED] TELEPHONE CONFERENCE WITH MIKE RE: [REDACTED]	1.00	450.00
786027!	H	02/26/20	308	REVIEW OF SUPPLEMENTAL BRIEF FILED BY WENDY'S COUNSEL AND CORRESPONDENCE TO TRUSTEES; TELEPHONE CONFERENCE WITH LEE SMITH RE: APPRAISAL ISSUES; REVIEW OF CORRESPONDENCE FROM KIMMEL TO KEVIN RE: [REDACTED]	1.75	787.50

#	Type	Date	Atty	Description	Hours	Amount
7880491	H	03/13/20	308	REVIEW OF ORDER FROM THE COURT.	1.00	450.00
7883551	H	03/16/20	308	TELEPHONE CONFERENCE WITH MIKE KIMMEL RE: [REDACTED] [REDACTED] CORRESPONDENCE TO KENT RE: [REDACTED]	0.75	337.50
7883861	H	03/18/20	308	CONFERENCE WITH KENT AND TODD TO [REDACTED] REVIEW AND REVISE JUDGMENT.	3.50	1575.00
7888841	H	03/19/20	308	REVIEW AND REVISE PROPOSED JUDGMENT; CONFERENCE CALL WITH TODD AND MIKE RE: [REDACTED]	2.25	1012.50
7888891	H	03/19/20	308	CONFERENCE CALL WITH MIKE, TODD AND KEVIN RE: [REDACTED] PREPARE LANGUAGE FOR SSJ ISSUE TRUST FINANCIALS.	1.00	450.00
7888921	H	03/23/20	308	REVIEW OF MEMO OF COSTS FILED BY WENDY.	0.75	337.50
7891431	H	03/24/20	308	CORRESPONDENCE TO TRUSTEE ON [REDACTED]	0.50	225.00
7891801	H	03/25/20	308	CONFERENCE CALL WITH KENT AND TODD RE: [REDACTED] TELEPHONE CONFERENCE WITH TODD RE: [REDACTED] [REDACTED] CONFERENCE WITH CAROLYN RENNER TO DISCUSS [REDACTED] REVIEW OF CORRESPONDENCE FROM LEE SMITH ON DUCK FLAT PROPERTY.	2.50	1125.00
7892851	H	03/26/20	308	REVIEW OF REDLINE VERSION OF JUDGMENT TO BE SUBMITTED TO THE COURT; REVIEW AND REVISE MOTION TO STRIKE AND RETAX COSTS.	1.75	787.50
7894021	H	03/27/20	308	REVIEW OF ORDER FROM JUDGE HARDY ON EXECUTION OF ORDER AND CORRESPONDENCE TO MIKE AND TODD RE: [REDACTED]	1.00	450.00
7895271	H	03/30/20	308	CORRESPONDENCE TO LEE SMITH RE: DUCK FLAT PROPERTY.	0.50	225.00
GRAND TOTAL					<u>723.25</u>	<u>325462.50</u>

I - Transaction Not Yet Billed
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Fees for L. Robert LeGoy, Jr., Esq.

Fees for L. Robert LeGoy, Jr., Esq.

#	Type	Date	Atty	Description	Hours	Amount
730618	H	05/01/18	107	EMAILS REGARDING [REDACTED]	0.25	106.25
730628	H	05/03/18	107	CONFERENCES AND REVIEW DOCUMENTS REGARDING [REDACTED]	0.50	212.50
730640	H	05/07/18	107	CONFERENCE AND CORRESPONDENCE.	0.25	106.25
730643	H	05/08/18	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	106.25
730652	H	05/09/18	107	CONFERENCES REGARDING [REDACTED]	0.50	212.50
730656	H	05/10/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
732179	H	05/16/18	107	CONFERENCES AND REVIEW ORDER REGARDING [REDACTED]	1.00	425.00
732190	H	05/21/18	107	REVIEW THE SAMUEL JAKSICK FAMILY TRUST AGREEMENT AND PREPARE LETTER REGARDING SAME.	1.00	425.00
732200	H	05/22/18	107	REVIEW AND REVISE LETTER.	0.50	212.50
732202	H	05/23/18	107	EMAILS, LETTER AND CONFERENCES REGARDING [REDACTED]	0.75	318.75
733420	H	06/07/18	107	CONFERENCES [REDACTED]	0.25	106.25
733448	H	06/12/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
734903	H	06/16/18	107	REVIEW DOCUMENTS AND CORRESPONDENCE.	0.25	106.25
734906	H	06/18/18	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.50	212.50
734917	H	06/19/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
737339	H	07/19/18	107	EMAILS REGARDING [REDACTED]	0.25	106.25
736642	H	07/25/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
737357	H	07/30/18	107	CONFERENCES REGARDING [REDACTED]	0.50	212.50
737366	H	07/31/18	107	CONFERENCES REGARDING [REDACTED]	0.50	212.50
738855	H	08/02/18	107	CONFERENCES AND EMAIL REGARDING [REDACTED]	0.50	212.50
738858	H	08/03/18	107	CONFERENCES AND EMAIL REGARDING [REDACTED]	0.75	318.75
753209	H	08/06/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
738866	H	08/07/18	107	CONFERENCES AND REVIEW PLEADINGS REGARDING [REDACTED]	0.25	106.25
753211	H	08/20/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753214	H	08/29/18	107	CONFERENCES REGARDING [REDACTED]	0.50	212.50
753215	H	08/30/18	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	106.25
753218	H	08/31/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753220	H	09/04/18	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	106.25
753221	H	09/05/18	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	106.25
753223	H	10/09/18	107	CONFERENCES.	0.25	106.25
753225	H	10/10/18	107	CONFERENCES AND REVISE DOCUMENT.	0.75	318.75
753227	H	10/11/18	107	CONFERENCES AND REVISE DOCUMENT.	0.25	106.25
753229	H	10/12/18	107	CONFERENCES AND REVISE DOCUMENT.	0.50	212.50
753231	H	10/15/18	107	CONFERENCES, EMAILS AND REVISE DOCUMENT.	0.50	212.50

#	Type	Date	Atty	Description	Hours	Amount
753233	H	10/17/18	107	EMAILS AND REVISE DOCUMENT.	0.75	318.75
753234	H	10/19/18	107	CONFERENCES AND EMAILS.	0.25	106.25
753235	H	10/29/18	107	CONFERENCES.	0.25	106.25
753237	H	11/01/18	107	EMAILS REGARDING [REDACTED] CONFERENCES REGARDING [REDACTED]	0.50	212.50
753241	H	11/13/18	107	CONFERENCES REGARDING [REDACTED]	0.75	318.75
753243	H	11/14/18	107	CONFERENCES, EMAILS AND REVIEW DOCUMENTS REGARDING [REDACTED]	0.25	106.25
753244	H	11/15/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753246	H	11/19/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753247	H	11/23/18	107	REVIEW DOCUMENTS.	0.25	106.25
753249	H	11/26/18	107	REVIEW DOCUMENTS AND CONFERENCES REGARDING [REDACTED]	0.50	212.50
753250	H	11/29/18	107	CONFERENCE REGARDING [REDACTED]	0.25	106.25
753252	H	12/04/18	107	CONFERENCE REGARDING [REDACTED]	0.25	106.25
753254	H	12/05/18	107	REVIEW DOCUMENTS AND EMAILS REGARDING [REDACTED]	0.25	106.25
753256	H	12/06/18	107	REVIEW DOCUMENTS AND EMAIL AND CONFERENCES REGARDING [REDACTED]	0.25	106.25
753258	H	12/12/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753260	H	12/17/18	107	CONFERENCES REGARDING LITIGATION [REDACTED]	0.50	212.50
753262	H	12/18/18	107	REVIEW DOCUMENTS AND CONFERENCES REGARDING [REDACTED]	0.50	212.50
753264	H	12/20/18	107	REVIEW DOCUMENTS AND CONFERENCES REGARDING [REDACTED]	0.25	106.25
753265	H	12/21/18	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753267	H	01/06/19	107	REVIEW FILES.	0.25	106.25
753268	H	01/08/19	107	EMAILS REGARDING [REDACTED]	0.25	106.25
753270	H	01/09/19	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.50	212.50
753272	H	01/16/19	107	CONFERENCES REGARDING [REDACTED]	0.50	212.50
753274	H	01/17/19	107	CONFERENCES AND REVIEW DOCUMENTS REGARDING [REDACTED]	1.25	531.25
753276	H	01/20/19	107	RESEARCH AND REVIEW DOCUMENTS REGARDING [REDACTED]	1.00	425.00
753278	H	01/21/19	107	TESTIFY AT DEPOSITION.	3.00	1275.00
753282	H	01/22/19	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.50	212.50
753288	H	01/23/19	107	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	106.25

#	Type	Date	Atty	Description	Hours	Amount
753293	H	01/24/19	107	CONFERENCES AND EMAILS [REDACTED]	0.50	212.50
753297	H	01/25/19	107	CONFERENCES, DOCUMENTS AND EMAILS REGARDING [REDACTED]	0.50	212.50
753302	H	01/28/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
753308	H	01/29/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
754274	H	02/05/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
754278	H	02/06/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
754287	H	02/07/19	107	CONFERENCES AND CORRESPONDENCE.	0.25	106.25
754294	H	02/11/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
754305	H	02/13/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
754317	H	02/15/19	107	CONFERENCES REGARDING [REDACTED]	0.25	106.25
755444	H	02/17/19	107	REVIEW DOCUMENTS.	0.75	318.75
755447	H	02/18/19	107	REVIEW DOCUMENTS AND CONFERENCES REGARDING [REDACTED]	1.25	531.25
755451	H	02/19/19	107	REVIEW DOCUMENTS.	1.25	531.25
755456	H	02/20/19	107	REVIEW DOCUMENTS AND EMAILS.	0.25	106.25
755493	H	02/27/19	107	PREPARE FOR TESTIMONY.	0.50	212.50
755495	H	02/28/19	107	PREPARE FOR TESTIMONY AND APPEAR AT COURT TO TESTIFY.	3.75	1593.75
755500	H	03/01/19	107	APPEAR IN COURT TO TESTIFY AS PERCIPIENT EXPERT WITNESS.	1.50	637.50
756719	H	03/05/19	107	COMMUNICATIONS REGARDING LITIGATIONS AND ADMINISTRATIONS.	0.50	212.50
758248	H	03/22/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
759651	H	04/17/19	107	COMMUNICATIONS REGARDING [REDACTED]	1.25	531.25
761831	H	05/01/19	107	COMMUNICATIONS AND REVIEW DOCUMENTS REGARDING [REDACTED]	0.25	106.25
761843	H	05/03/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.50	212.50
763935	H	05/14/19	107	COMMUNICATIONS ABOUT [REDACTED]	0.25	106.25
764843	H	06/05/19	107	CONFERENCE REGARDING [REDACTED]	0.75	318.75
764854	H	06/06/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.50	212.50
766096	H	06/19/19	107	WORK ON CASES.	0.25	106.25
766119	H	06/27/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
766564	H	07/01/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.50	212.50
766569	H	07/02/19	107	COMMUNICATIONS REGARDING [REDACTED]	1.25	531.25
766574	H	07/03/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.50	212.50
768735	H	07/19/19	107	COMMUNICATION REGARDING [REDACTED]	0.25	106.25
768742	H	07/22/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25

#	Type	Date	Atty	Description	Hours	Amount
770530	H	08/12/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.50	212.50
770555	H	08/19/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
774406	H	09/25/19	107	COMMUNICATIONS REGARDING [REDACTED]	1.50	637.50
775172	H	10/14/19	107	COMMUNICATIONS REGARDING [REDACTED]	1.25	531.25
777228	H	10/22/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
777260	H	10/30/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
780695	H	12/09/19	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	106.25
785183!	H	02/04/20	107	COMMUNICATION REGARDING [REDACTED]	0.25	112.50
785201!	H	02/07/20	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	112.50
786086!	H	02/24/20	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	112.50
788911!	H	03/09/20	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	112.50
788949!	H	03/19/20	107	COMMUNICATIONS REGARDING [REDACTED]	0.25	112.50
GRAND TOTAL					<u>53.50</u>	<u>22768.75</u>

I - Transaction Not Yet Billed
H - Billable Time

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Fees for Carolyn K. Renner, Esq.

Fees for Carolyn K. Renner, Esq.

#	Type	Date	Atty	Description	Hours	Amount
729496	H	05/03/18	324	REVIEW VARIOUS EMAILS FROM D. LATTIN CONCERNING [REDACTED] BRIEF OFFICE CONFERENCE WITH D. LATTIN REGARDING [REDACTED]	0.50	162.50
729508	H	05/04/18	324	BEGIN RESEARCHING NEVADA LAW ON THE ATTORNEY CLIENT PRIVILEGE ISSUE.	0.75	243.75
729526	H	05/06/18	324	CONTINUE RESEARCHING NEVADA LAW ON THE ATTORNEY CLIENT PRIVILEGE ISSUE; DRAFT MEMO/LETTER TO DISCOVERY COMMISSIONER IN ANTICIPATION OF TELEPHONIC HEARING.	1.50	487.50
732035	H	05/07/18	324	REVIEW AND REVISE LETTER TO DISCOVERY COMMISSIONER.	0.25	81.25
732049	H	05/10/18	324	REVIEW DOCUMENTS; PREPARE DOCUMENT DISCLOSURE ON [REDACTED]	1.25	406.25
732066	H	05/17/18	324	REVIEW EMAIL AND DOCUMENTS FROM KENT ROBISON REGARDING [REDACTED] REVIEW RECOMMENDATION OF THE DISCOVERY COMMISSIONER REGARDING PRIVILEGE; REVIEW ADDITIONAL EMAILS HELD BY STAN'S ATTORNEY.	1.00	325.00
732100	H	05/18/18	324	DRAFT DEPOSITION NOTICE OF TODD JAKSICK; REVIEW DOCUMENTS ON CONSENT AGREEMENT FLASH DRIVE FOR DISCLOSURE PER KENT ROBISON'S EMAIL; OFFICE CONFERENCE WITH D. LATTIN REGARDING [REDACTED] TELEPHONE COMMUNICATION WITH KENT ROBISON'S OFFICE REGARDING [REDACTED]	1.25	406.25
732114	H	05/23/18	324	REVIEW OF INDEMNIFICATION DOCUMENTS IN ORDER TO PREPARE RESPONSE TO KENT ROBISON REGARDING [REDACTED]	0.50	162.50
732117	H	05/24/18	324	DRAFT LETTER TO MARK CONNOT REGARDING DISCOVERY COMMISSIONER'S RECOMMENDATION FOR ORDER AND STATUS OF PRIVILEGED DOCUMENTS.	0.50	162.50
732123	H	05/29/18	324	REVIEW EMAIL AND RELEVANT CORRESPONDENCE FROM KENT ROBISON CONCERNING [REDACTED]	0.25	81.25
732125	H	05/30/18	324	BRIEF REVIEW OF REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY WENDY JAKSICK TO TODD JAKSICK IN ALL OF HIS CAPACITIES; ATTEND MEETING WITH TODD JAKSICK'S COUNSEL AT KENT ROBISON'S OFFICE.	2.00	650.00
732130	H	05/31/18	324	OFFICE CONFERENCE WITH D. LATTIN REGARDING [REDACTED]	0.50	162.50

#	Type	Date	Atty	Description	Hours	Amount
732133	H	06/01/18	324	REVIEW TODD JAKSICK'S STATUS CONFERENCE STATEMENT. DRAFT STATUS REPORT; VARIOUS EMAIL COMMUNICATIONS TO AND FROM THERESE SHANKS REGARDING	1.00	325.00
733974	H	06/08/18	324	ATTEND CONFERENCE CALL ON WITH ALL COUNSEL; FOLLOW UP CALL WITH KENT ROBISON.	0.75	243.75
733980	H	06/11/18	324	REVIEW EMAIL FROM KENT ROBISON REGARDING	0.25	81.25
733986	H	06/12/18	324	REVIEW FOLLOW UP EMAIL FROM COUNSEL FOR STAN JAKSICK INDIVIDUALLY. REVIEW MEMO FROM KENT ROBISON CONCERNING	1.75	568.75
733992	H	06/13/18	324	REVIEW STAN JAKSICK'S RESPONSES TO TODD'S DISCOVERY REQUESTS; REVIEW WENDY JAKSICK'S RESPONSES TO TODD'S DISCOVERY REQUESTS; REVIEW WENDY JAKSICK'S DISCOVERY REQUESTS TO TODD, FIRST SET. ATTEND MEET AND CONFER ON THE ISSUE OF WENDY'S REQUESTS FOR PRODUCTION OF DOCUMENTS; REVIEW STATUS REPORTS FOR UPCOMING HEARING BEFORE DISCOVERY COMMISSIONER.	0.75	243.75
733997	H	06/14/18	324	ATTEND DISCOVERY HEARING BEFORE COMMISSIONER AYERS VIA TELEPHONE.	0.75	243.75
734013	H	06/20/18	324	REVIEW EMAIL CORRESPONDENCE FROM KENT ROBISON REGARDING REVIEW AND DISCUSS	0.75	243.75
734017	H	06/21/18	324	OFFICE CONFERENCE WITH D. LATTIN, K. ROBISON AND TODD JAKSICK.	1.25	406.25
734021	H	06/22/18	324	BEGIN DRAFTING RESPONSES TO DOCUMENT REQUESTS FROM WENDY JAKSICK.	2.25	731.25
734029	H	06/23/18	324	REVIEW ORDER DISMISSING CLAIMS FOR CONSUMER FRAUD; CONTINUE DRAFTING RESPONSES TO DOCUMENT REQUESTS FROM WENDY JAKSICK.	4.50	1462.50
734031	H	06/24/18	324	CONTINUE DRAFTING RESPONSES TO DOCUMENT REQUESTS FROM WENDY JAKSICK.	6.00	1950.00
734450	H	06/25/18	324	DRAFT AND RESPOND TO VARIOUS EMAIL COMMUNICATIONS FROM CO-COUNSEL REGARDING CONTINUE DRAFTING RESPONSES TO DOCUMENT REQUESTS FROM WENDY; OFFICE CONFERENCE WITH D.	4.75	1543.75

#	Type	Date	Atty	Description	Hours	Amount
734465	H	06/26/18	324	LATTIN REGARDING [REDACTED] FINISH DRAFTING RESPONSES TO DOCUMENT REQUESTS FROM WENDY.	7.50	2437.50
735544	H	07/10/18	324	REVIEW SUBPOENAS DUCES TECUM AND SUBPOENAS OF PERSON MOST KNOWLEDGEABLE ISSUED BY COUNSEL FOR STANLEY JAKSICK; DRAFT OBJECTIONS TO SUBPOENA AND SUBPOENA DUCES TECUM SERVED ON HOME CAMP LAND AND LIVESTOCK CO.	1.50	487.50
736703	H	07/17/18	324	DRAFT OFFER OF JUDGMENT TO STANLEY JAKSICK.	0.50	162.50
736704	H	07/17/18	324	REVIEW EMAIL FROM ADAM HOSMER HENNER REGARDING [REDACTED] [REDACTED] REVIEW NECESSARY INFORMATION IN ORDER TO RESPOND TO EMAIL; DRAFT EMAIL IN RESPONSE REGARDING [REDACTED]	0.50	162.50
736709	H	07/18/18	324	REVIEW RESPONSES TO DISCOVERY REQUESTS FROM WENDY JAKSICK PRODUCED BY TODD IN HIS INDIVIDUAL CAPACITY.	0.50	162.50
737585	H	07/27/18	324	REVIEW SUBPOENAS SERVED BY STANLEY JAKSICK AND BEGIN TO PREPARE RESPONSES.	2.00	650.00
737587	H	07/28/18	324	FINISH PREPARING RESPONSES TO SUBPOENAS DUCES TECUM SERVED BY STANLEY JAKSICK.	1.50	487.50
737594	H	07/31/18	324	DRAFT OBJECTIONS TO SUBPOENAS FOR PMK DEPOSITIONS SERVED BY STANLEY JAKSICK; REVIEW AND REVISE RESPONSES TO OBJECTIONS TO SUBPOENAS DUCES TECUM SERVED BY STANLEY JAKSICK.	1.50	487.50
738552	H	08/05/18	324	REVIEW OF DOCUMENTS IN PREPARATION TO DRAFT SUPPLEMENT TO VARIOUS ENTITY RESPONSES TO SUBPOENAS DUCES TECUM.	0.75	243.75
738566	H	08/09/18	324	DRAFT SUPPLEMENTAL DOCUMENT DISCLOSURE FOR SUBPOENA DUCES TECUM SERVED ON BASECAMP; DRAFT SUPPLEMENTAL DOCUMENT DISCLOSURE FOR SUBPOENA DUCES TECUM SERVED ON BRIGHT HOLLAND.	0.50	162.50
739978	H	08/18/18	324	REVIEW DOCUMENTS TO BE DISCLOSED AS SUPPLEMENT TO RESPONSE TO SUBPOENA TO DUCK LAKE RANCH AND WSR; DRAFT EMAIL COMMUNICATION TO CO-COUNSEL REGARDING [REDACTED]	0.25	81.25
739980	H	08/19/18	324	DRAFT RESPONSES TO LEGOY SUBPOENA.	3.75	1218.75

#	Type	Date	Atty	Description	Hours	Amount
739956	H	08/20/18	324	REVIEW AND REVISE RESPONSES TO LEGOY SUBPOENA; DRAFT SUPPLEMENT TO FOURTH REQUEST FOR PRODUCTION PROPOUNDED BY WENDY TO TODD.	2.25	731.25
739995	H	08/31/18	324	REVIEW DOCUMENTS FOR DISCLOSURE.	0.50	162.50
741762	H	09/04/18	324	REVIEW RELEVANT DOCUMENT FOR PRODUCTION; DRAFT RESPONSES TO INTERROGATORIES TO TODD JAKSICK PROPOUNDED BY WENDY JAKSICK; DRAFT SECOND SUPPLEMENTAL DISCLOSURE OF DOCUMENTS.	2.00	650.00
741768	H	09/06/18	324	REVIEW MOTION TO TERMINATE DEPOSITION; REVIEW OPPOSITION TO MOTION TO TERMINATE FILED BY WENDY JAKSICK; BEGIN DRAFTING REPLY.	1.00	325.00
741771	H	09/07/18	324	DRAFT REPLY IN SUPPORT OF MOTION TO TERMINATE OR LIMIT DEPOSITION AND REQUEST FOR SANCTIONS.	1.75	568.75
741784	H	09/11/18	324	REVIEW DOCUMENTS FOR DISCLOSURE ON BEHALF OF THE FAMILY TRUST.	0.50	162.50
741787	H	09/13/18	324	ATTEND MEET AND CONFER PHONE CALL ON DISCOVERY ISSUES WITH COUNSEL FOR WENDY JAKSICK.	1.00	325.00
741794	H	09/18/18	324	REVIEW OPPOSITION AND CROSS MOTION FOR SANCTIONS FILED BY COUNSEL FOR TODD IN HIS INDIVIDUAL CAPACITY; DRAFT JOINDER.	0.50	162.50
741800	H	09/19/18	324	DRAFT SUPPLEMENT TO PETITION FOR APPROVAL OF FINANCIAL STATEMENT; REVIEW DOCUMENTS IN PREPARATION FOR DISCLOSURE AND SUPPLEMENT TO SUBPOENA REQUESTS.	2.00	650.00
741807	H	09/21/18	324	REVIEW VARIOUS FILINGS MADE BY COUNSEL FOR WENDY JAKSICK; REVIEW VARIOUS DOCUMENTS FOR DISCLOSURE; DRAFT SUPPLEMENTAL RESPONSE TO SUBPOENA DUCES TECUM FOR BUCKHORN RANCH LLC.	1.00	325.00
742406	H	09/29/18	324	REVIEW WENDY'S EMERGENCY MOTION AND EX PARTE MOTION FOR ORDER SHORTENING TIME IN PREPARATION TO DRAFT RESPONSE.	0.75	243.75
742999	H	10/01/18	324	DRAFT RESPONSE TO WENDY'S EMERGENCY MOTION TO EXTEND DISCOVERY DEADLINES.	2.00	650.00
743359	H	10/09/18	324	REVIEW TODD JAKSICK'S OPPOSITION TO EMERGENCY MOTION TO EXTEND DISCOVERY, EXPERT DESIGNATION DEADLINES, AND TRIAL.	0.50	162.50
743978	H	10/16/18	324	REVIEW ORDER DENYING MOTION TO TERMINATE OR LIMIT DEPOSITION;	0.50	162.50

#	Type	Date	Atty	Description	Hours	Amount
743986	H	10/18/18	324	REVIEW WENDY'S OMNIBUS RESPONSE TO THE OPPOSITION TO THE EMERGENCY MOTION TO EXTEND DISCOVERY. DRAFT RESPONSEs TO WENDY'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS TO TODD JAKSICK.	1.00	325.00
744428	H	10/24/18	324	REVIEW ORDER ENTERED BY THE COURT CONCERNING MOTION TO EXTEND DISCOVERY DEADLINES.	0.25	81.25
744434	H	10/25/18	324	REVIEW DOCUMENTS; PREPARE FOURTH SUPPLEMENTAL DISCLOSURE.	0.50	162.50
744779	H	10/29/18	324	BEGIN DRAFTING OPPOSITION TO MOTION TO COMPEL.	1.50	487.50
744783	H	10/30/18	324	CONTINUE DRAFTING OPPOSITION TO MOTION TO COMPEL; CONDUCT RELEVANT RESEARCH NECESSARY TO RESPOND TO MOTION TO COMPEL; REVIEW RELEVANT DOCUMENTS NECESSARY TO RESPOND TO MOTION TO COMPEL.	3.50	1137.50
744785	H	10/31/18	324	CONTINUE RESEARCHING, REVIEWING DOCUMENTS TO PREPARE OPPOSITION TO MOTION TO COMPEL; CONTINUE DRAFTING OPPOSITION TO MOTION TO COMPEL.	3.00	975.00
745146	H	11/01/18	324	FINISH DRAFTING OPPOSITION TO MOTION TO COMPEL.	1.50	487.50
746034	H	11/06/18	324	REVIEW DOCUMENTS AND BEGIN DRAFTING PETITION FOR INSTRUCTIONS.	2.00	650.00
746039	H	11/07/18	324	CONTINUE DRAFTING PETITION FOR INSTRUCTIONS.	1.75	568.75
746045	H	11/08/18	324	FINISH DRAFTING PETITION FOR INSTRUCTIONS.	1.00	325.00
746411	H	11/12/18	324	DRAFT STATUS REPORT IN PREPARATION FOR STATUS HEARING ON NOVEMBER 16.	1.00	325.00
746415	H	11/13/18	324	DRAFT RESPONSES TO STANLEY JAKSICK'S FIRST SET OF REQUESTS FOR PRODUCTION TO TODD JAKSICK, INDIVIDUALLY AND AS CO-TRUSTEE OF THE SAMUEL S. JAKSICK JR. FAMILY TRUST.	5.50	1787.50
746421	H	11/14/18	324	REVIEW, REVISE AND FINALIZE DISCOVERY RESPONSES TO STANLEY JAKSICK'S FIRST SET OF REQUESTS FOR PRODUCTION TO TODD JAKSICK, INDIVIDUALLY AND AS TRUSTEE OF THE SSJ's ISSUE TRUST.	1.00	325.00
746428	H	11/15/18	324	REVIEW OMNIBUS REPLY TO MOTION TO COMPEL FILED BY COUNSEL FOR WENDY JAKSICK; REVIEW AND REVISE PETITIONER'S STATUS REPORT TO THE COURT.	1.75	568.75
746432	H	11/16/18	324	ATTEND STATUS HEARING BEFORE JUDGE	2.75	893.75

#	Type	Date	Atty	Description	Hours	Amount
				HARDY ON OUTSTANDING DISCOVERY ISSUES; OFFICE CONFERENCE WITH D. LATTIN AND TODD JAKSICK; DRAFT EMAIL TO D. LATTIN AND STAFF REGARDING [REDACTED]		
746691	H	11/20/18	324	DRAFT RESPONSES TO WENDY'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO THE FAMILY TRUST.	4.50	1462.50
747424	H	11/26/18	324	REVIEW OF INFORMATION TO BE INCLUDED IN THE TRIAL PROTOCOL REPORT TO BE PREPARED FOR THE JUDGE.	0.25	81.25
747427	H	11/27/18	324	REVIEW MEMO ON STATUTE OF LIMITATIONS ISSUE; REVIEW AND REVISE RESPONSES TO WENDY'S 7TH REQUEST FOR PRODUCTION OF DOCUMENTS; BEGIN PREPARING RESPONSES TO INTERROGATORIES PROPOUNDED BY STAN TO TODD AS CO-TRUSTEE OF THE FAMILY TRUST.	2.50	812.50
747431	H	11/28/18	324	BEGIN PREPARATION OF RESPONSES TO WRITTEN DISCOVERY REQUESTS SERVED BY STANLEY JAKSICK TO TODD JAKSICK AS CO-TRUSTEE OF THE FAMILY TRUST.	1.00	325.00
747435	H	11/29/18	324	DRAFT OBJECTIONS AND RESPONSES TO STAN'S REQUEST FOR ADMISSIONS AND INTERROGATORIES TO TODD AS CO-TRUSTEE OF THE FAMILY TRUST.	4.00	1300.00
747437	H	11/30/18	324	REVIEW AND REVISE WRITTEN RESPONSES TO DISCOVERY REQUESTS PROPOUNDED BY STANLEY JAKSICK; REVIEW COUNTERPETITION FILED BY WENDY IN PREPARATION TO RESPOND TO PETITION AND EMERGENCY MOTION; BEGIN REVIEW OF PETITION AND EMERGENCY MOTION	2.50	812.50
748199	H	12/02/18	324	REVIEW TODD'S RESPONSE AND OBJECTION TO STAN'S AMENDED OBJECTION AND COUNTERPETITION REGARDING FAMILY TRUST AND ISSUE TRUST (AS AN INDIVIDUAL AND BENEFICIARY).	0.25	81.25
748209	H	12/03/18	324	REVIEW 102 PAGE PETITION AND MOTION IN ORDER TO PREPARE RESPONSIVE BRIEF.	2.50	812.50
748212	H	12/04/18	324	REVIEW DOCUMENTS AND BEGIN PREPARING RESPONSE TO 102 PAGE PETITION AND MOTION FILED BY COUNSEL FOR WENDY JAKSICK.	3.50	1137.50
748219	H	12/05/18	324	CONTINUE PREPARING RESPONSE TO 102 PAGE PETITION AND MOTION FILED BY	3.00	975.00

#	Type	Date	Atty	Description	Hours	Amount
748222	H	12/06/18	324	COUNSEL FOR WENDY JAKSICK. REVIEW AND REVISE RESPONSE TO 102 PAGE PETITION AND MOTION FILED BY COUNSEL FOR WENDY JAKSICK; ATTEND PHONE CONFERENCE WITH D. LATTIN, K. ROBISON AND TODD JAKSICK; DRAFT SUBSTANTIVE JOINDER TO KENT'S MOTION FOR SUMMARY JUDGMENT ON WENDY'S CLAIMS PERTAINING TO THE LAKE HOUSE; REVIEW SECOND MOTION FOR SUMMARY JUDGMENT FILED BY KENT.	3.00	975.00
748224	H	12/07/18	324	REVIEW ORDER APPOINTING MEDIATOR; REVIEW TODD JAKSICK'S OPPOSITION TO WENDY'S MOTION FOR LEAVE TO JOIN INDESPENSABLE PARTIES.	0.25	81.25
749470	H	12/10/18	324	REVIEW SUBPOENAS DUCES TECUM TO THIRD PARTIES IN CALIFORNIA SENT BY COUNSEL FOR WENDY JAKSICK; REVIEW PROPER PROCEDURE FOR OUT OF STATE DISCOVERY.	0.50	162.50
749475	H	12/11/18	324	REVIEW TRIAL PROTOCOL STATEMENT; DRAFT EXPERT DISCLOSURE; ATTEND CONFERENCE CALL WITH DISCOVERY COMMISSIONER.	1.25	406.25
749478	H	12/12/18	324	REVIEW LEGOY FILES FOR RESPONSIVE DOCUMENTS TO SUBPOENA DUCES TECUM.	2.75	893.75
749480	H	12/13/18	324	CONTINUE REVIEW OF LEGOY FILES FOR RESPONSIVE DOCUMENTS TO SUBPOENA DUCES TECUM; TELEPHONE COMMUNICATION WITH ZACHERY JOHNSON REGARDING DISCOVERY ISSUES; BEGIN DRAFTING EXPERT DISCLOSURES.	3.00	975.00
749486	H	12/14/18	324	CONTINUE REVIEW OF LEGOY FILES FOR RESPONSE TO SUBPOENA DUCES TECUM.	3.25	1056.25
749499	H	12/17/18	324	CONTINUE DRAFTING EXPERT DISCLOSURES; REVIEW AND REVISE EXPERT DISCLOSURES.	1.00	325.00
749503	H	12/18/18	324	REVIEW HOME CAMP DOCUMENTS FOR ADDITIONAL DOCUMENTS RESPONSIVE TO REQUEST FOR PRODUCTION; REVIEW STATUS REPORTS FILED BY THE PARTIES IN PREPARATION FOR THE STATUS CONFERENCE TO BE HELD THIS AFTERNOON WITH THE DISCOVERY COMMISSIONER; TELEPHONE COMMUNICATION WITH WILLIAM KIMMEL, LEE SMITH AND BRUCE THEE REGARDING [REDACTED] REVIEW WENDY JAKSICK'S REPLY IN SUPPORT OF HER PETITION AND EMERGENCY MOTION AND LEAVE TO JOIN	3.75	1218.75

#	Type	Date	Atty	Description	Hours	Amount
749507	H	12/19/18	324	INDISPENSIBLE PARTIES; PARTICIPATE IN STATUS CONFERENCE CALL WITH DISCOVERY COMMISSIONER. TELEPHONE COMMUNICATION WITH KURT HARDUNG REGARDING [REDACTED]	0.75	243.75
749512	H	12/20/18	324	[REDACTED] DRAFT SUPPLEMENT TO EXPERT PRODUCTION. REVIEW OPPOSITION TO TODD'S MOTION FOR SUMMARY JUDGMENT REGARDING STAN JAKSICK INDEMNIFICATION AND LAKE HOUSE; REVIEW TRUST AGREEMENTS FOR ATTORNEY-CLIENT PRIVILEGE PRESERVATION; REVIEW RELEVANT PROVISIONS OF NEVADA REVISED STATUTES; DRAFT OPPOSITION TO MOTION TO COMPEL LEGOY FILES.	2.50	812.50
749514	H	12/21/18	324	REVIEW AND REVISE OPPOSITION TO MOTION TO COMPEL LEGOY SUBPOENA PRODUCTION; DRAFT SUPPLEMENT TO EXPERT WITNESS DISCLOSURES.	1.50	487.50
749945	H	12/27/18	324	REVIEW DOCUMENTS; BEGIN DRAFTING MEDIATION STATEMENT.	3.00	975.00
749947	H	12/28/18	324	REVIEW AND REVISE MEDIATION STATEMENT; REVIEW SETTLEMENT CONCEPTS; DRAFT REBUTTAL EXPERT DISCLOSURES; DRAFT SUPPLEMENT TO EXPERT DISCLOSURES.	2.00	650.00
750006	H	12/31/18	324	REVIEW MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY OF WALLACE; REVIEW WENDY'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT FILED BY TODD INDIVIDUALLY; REVIEW RECOMMENDATION FOR ORDER FILED BY DISCOVERY COMMISSIONER AYERS REGARDING MOTION TO COMPEL PRODUCTION FROM JESSICA CLAYTON; REVIEW SUBPOENA FOR DEPOSITION OF BRIAN MCQUAID; REVIEW STANLEY'S TRIAL PROTOCOL STATEMENT; REVIEW WENDY'S TRIAL PROTOCOL STATEMENT.	0.75	243.75
750341	H	01/02/19	324	DRAFT PRETRIAL DISCLOSURES AS REQUIRED BY RULES.	0.75	243.75
750347	H	01/04/19	324	REVIEW, REVISE AND FINALIZE PRETRIAL DISCLOSURES AND PREPARE FOR FILING AS REQUIRED BY COURT RULES; REVIEW TODD'S (AS AN INDIVIDUAL) REPLY IN SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT AGAINST WENDY'S CLAIMS REGARDING THE TAHOE HOUSE; PREPARE JOINDER TO MOTION FOR SUMMARY JUDGMENT.	2.50	812.50

#	Type	Date	Atty	Description	Hours	Amount
751026	H	01/07/19	324	REVIEW INFORMATION CONCERNING MEDIATION, SCHEDULED DEPOSITIONS, AND DISCOVERY DISPUTES; REVIEW LETTER FROM ZAC JOHNSON REGARDING ACCOUNTING DEMANDS; REVIEW RECOMMENDATION FOR ORDER REGARDING KEVIN RILEY DISCLOSURES; REVIEW VARIOUS CORRESPONDENCE FROM KENT ROBISON REGARDING [REDACTED]	1.50	487.50
751029	H	01/08/19	324	REVIEW REQUEST FOR SUBMISSION OF MOTION TO COMPEL DOCUMENTS FROM L. ROBERT LEGOY AND LAW FIRM; REVIEW DISCOVERY STATUS REPORTS FILED BY THE PARTIES IN ANTICIPATION OF THE DISCOVERY STATUS CONFERENCE; ATTEND DISCOVERY STATUS CONFERENCE WITH DISCOVERY COMMISSIONER.	1.75	568.75
751038	H	01/09/19	324	TELEPHONE CONFERENCE CALL WITH ROBISON'S OFFICE AND TODD JAKSICK REGARDING [REDACTED] REVIEW AND REVISE SUMMARY OF PRIOR DISCLOSURES AS REQUESTED BY STAN AND WENDY'S COUNSEL DURING DISCOVERY STATUS CONFERENCE; REVIEW VARIOUS EMAIL COMMUNICATIONS BETWEEN COUNSEL REGARDING [REDACTED]	1.00	325.00
751040	H	01/10/19	324	REVIEW MEMO ON PAYMENT OF EXPERT WITNESS TRAVEL EXPENSES; REVIEW MOTION FOR PROTECTIVE ORDER ON ISSUE OF DESIGNATION OF 30(B)(6) FOR TRUST.	0.50	162.50
751902	H	01/14/19	324	PREPARE DOCUMENTS FOR DEPOSITION OF WENDY'S ACCOUNTING EXPERT; REVIEW DISCOVERY REPORT FILED BY STAN JAKSICK; REVIEW WENDY'S OPPOSITION TO TODD'S MOTION FOR PROTECTIVE ORDER ON THE 30(B)(6) NOTICES; REVIEW TODD'S FOURTH DISCOVERY STATUS REPORT; REVIEW WENDY'S DISCOVERY DISPUTE CONFERENCE STATEMENT; REVIEW RILEY V. ROCKWELL NEVADA CASE ON TRUST DISPUTE.	1.00	325.00
751911	H	01/15/19	324	BEGIN DRAFTING RESPONSES TO DISCOVERY COMMISSIONERS' ORDER TO PRODUCE REGARDING RILEY DOCUMENTS; ATTEND DISCOVERY STATUS CONFERENCE.	1.50	487.50
751915	H	01/16/19	324	REVIEW ORDER ON KIMMEL SUMMARY JUDGMENT MOTION; REVIEW VARIOUS EMAIL COMMUNICATIONS TO AND FROM KEVIN RILEY REGARDING [REDACTED]	1.50	487.50

#	Type	Date	Atty	Description	Hours	Amount
751923	H	01/17/19	324	REVIEW WENDY'S SUPPLEMENTAL PRODUCTION OF DOCUMENTS. REVIEW PRELIMINARY RESPONSES RECEIVED FROM KEVIN RILEY FOR SUPPLEMENTAL PRODUCTION; BEGIN DRAFTING SUPPLEMENTAL RESPONSES TO DOCUMENT REQUESTS FROM WENDY TO KEVIN RILEY.	2.00	650.00
751925	H	01/18/19	324	FINISH, REVIEW AND FINALIZE SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION OF KEVIN RILEY; REVIEW ORDER GRANTING IN PART AND DENYING IN PART MOTION FOR LEAVE TO JOIN INDISPENSABLE PARTIES; REVIEW MINUTES OF DISCOVERY CONFERENCE.	4.00	1300.00
752201	H	01/22/19	324	REVIEW MINUTES FOR INFORMATION REGARDING DEPOSITION OF TODD JAKSICK; REVIEW TRANSCRIPT FOR SAME; ATTEND DEPOSITION OF JESSICA CLAYTON.	3.75	1218.75
752205	H	01/23/19	324	REVIEW EXPERT REPORT AND ATTEND DEPOSITION OF BRUCE WALLACE; REVIEW ORDERS OF THE COURT ON DISCOVERY ISSUES.	2.75	893.75
752209	H	01/24/19	324	DRAFT SETTLEMENT AGREEMENT BETWEEN STAN AND TODD JAKSICK; REVIEW ORDER OF THE COURT ON DISCOVERY ISSUES RELATED TO ADDED PARTIES; REVIEW VARIOUS EMAIL COMMUNICATION BETWEEN COUNSEL ON	2.00	650.00
752216	H	01/25/19	324	PREPARE FOR AND ATTEND TELEPHONIC CONFERENCE WITH KURT HARDUNG IN PREPARATION FOR HIS UPCOMING DEPOSITION; DRAFT EMAIL TO ZACH JOHNSON REGARDING NOTICE OF CHANGE IN DATE AND TIME OF DEPOSITION; TELEPHONE COMMUNICATION WITH PHILIP KREITLEIN REGARDING SETTLEMENT.	1.50	487.50
752902	H	01/28/19	324	ATTEND DEPOSITION OF JAMES GREEN; ATTEND DEPOSITION OF KURT HARDUNG.	2.50	812.50
752908	H	01/29/19	324	REVIEW AND REVISE PRIVILEGE LOG FOR LEGOY PRODUCTION; REVIEW AND REVISE MOTION IN LIMINE TO EXCLUDE EXPERT CAMPAGNA; ATTEND DISCOVERY STATUS CONFERENCE.	2.00	650.00
752913	H	01/30/19	324	REVIEW COURT'S MINUTES FROM DISCOVERY CONFERENCE HELD ON JANUARY 8; REVIEW MOTION IN LIMINE FILED BY WENDY'S COUNSEL TO PRECLUDE CERTAIN PREJUDICIAL	2.50	812.50

#	Type	Date	Atty	Description	Hours	Amount
752919	H	01/31/19	324	MATTERS; REVIEW MINUTES OF THE COURT FOR DISCOVERY CONFERENCE HELD ON JANUARY 22; REVIEW ADDITIONAL MOTIONS IN LIMINE FILED BY WENDY AND STAN; REVIEW WENDY'S EMERGENCY MOTION TO COMPEL ACCOUNTINGS FOR SUBTRUST ACCOUNTS; BEGIN DRAFTING OPPOSITION TO EMERGENCY MOTION. REVIEW ORDER DENYING MOTION TO STRIKE; REVIEW WENDY'S REPORT ON STATUS OF DISCOVERY; DRAFT INFORMED CONSENT AND WAIVER.	1.00	325.00
752923	H	02/01/19	324	FINISH DRAFTING OPPOSITION TO WENDY'S EMERGENCY MOTION TO COMPEL SUBTRUST ACCOUNTINGS; ATTEND DEPOSITION OF TODD JAKSICK.	4.00	1300.00
753601	H	02/02/19	324	REVIEW AND SUMMARIZE DEPOSITION OF WENDY JAKSICK FOR KEY ISSUES.	2.50	812.50
753603	H	02/03/19	324	CONTINUE REVIEW AND SUMMARY OF DEPOSITION OF WENDY JAKSICK FOR KEY ISSUES.	1.00	325.00
753605	H	02/04/19	324	CONTINUE REVIEW AND SUMMARY OF DEPOSITION OF WENDY JAKSICK FOR KEY ISSUES; MARK TRIAL EXHIBITS; ATTEND HEARING ON MOTION TO CONTINUE TRIAL.	4.00	1300.00
753607	H	02/05/19	324	REVIEW PRIVILEGE LOG TO DETERMINE WHETHER DOCUMENTS NEED TO BE DISCLOSED; REVIEW RECENT FILINGS WITH THE COURT.	2.00	650.00
753612	H	02/06/19	324	REVIEW RELEVANT DEPOSITION TESTIMONY.	1.25	406.25
753614	H	02/07/19	324	CONDUCT RELEVANT RESEARCH AND DRAFT RESPONSE TO WENDY'S POSITION ON ATTORNEY/CLIENT PRIVILEGED DOCUMENTS; MEET AND CONFER WITH ZACH JOHNSON ON PRIVILEGE ISSUE.	2.50	812.50
753618	H	02/08/19	324	REVIEW ARGUMENT CONCERNING PRIVILEGE; ATTEND HEARING BEFORE DISCOVERY COMMISSIONER ON PRIVILEGE ISSUE; ADDRESS ISSUES RELATED TO DISCLOSURE OF DOCUMENTS ON PRIVILEGE LOG; RESEARCH ISSUE OF VIOLATION OF THE NON-COMPETE CLAUSE; DRAFT NOTICE TO THE COURT REGARDING PRETRIAL ORDER.	2.00	650.00
754319	H	02/11/19	324	DRAFT PLEADING FOR DISCLOSURE OF WENDY'S SUBTRUST ACCOUNTING; FOLLOWING UP WITH KURT HARDUNG FOR INVOICE FOLLOWING DEPOSITION.	1.00	325.00
754322	H	02/12/19	324	REVIEW DECLARATION OF MARK CONNOT;	1.50	487.50

#	Type	Date	Atty	Description	Hours	Amount
				REVIEW RELEVANT DOCUMENTS IN PREPARATION TO DRAFT RESPONSE; DRAFT RESPONSE TO DECLARATION OF MARK CONNOT; DRAFT JOINDER TO RESPONSE FILED BY TODD INDIVIDUALLY.		
754326	H	02/13/19	324	ATTEND PRETRIAL HEARING ON CONTINUANCE OF TRIAL DATE AND MOTIONS IN LIMINE; FOLLOW UP COMMUNICATION WITH ROBERT LEGOY REGARDING [REDACTED]	2.00	650.00
754342	H	02/17/19	324	REVIEW EXHIBIT LIST TO LOCATE SPECIFIC TRIAL EXHIBIT FOR TRIAL COUNSEL; REVIEW LEGOY DOCUMENT PRODUCTION; REVIEW NEWLY MARKED EXHIBITS BY WENDY'S COUNSEL AND DISCUSS THE SAME WITH ROBERT LEGOY.	2.00	650.00
754788	H	02/20/19	324	REVIEW JURY INSTRUCTIONS AND VERDICT FORMS PROPOSED BY COUNSEL FOR WENDY JAKSICK.	2.50	812.50
754792	H	02/21/19	324	DRAFT MEMO REGARDING OBJECTIONS TO JURY INSTRUCTIONS PROVIDED BY COUNSEL FOR WENDY JAKSICK.	1.00	325.00
755068	H	02/26/19	324	SEND AND RECEIVE VARIOUS EMAILS CONCERNING [REDACTED]	0.25	81.25
755072	H	02/27/19	324	REVIEW MOTIONS FOR DIRECTED VERDICT ON ISSUE OF DAMAGES AND ON THE RELEASE LANGUAGE OF THE ACPAs.	0.50	162.50
755979	H	03/08/19	324	PARTICIPATION IN REVIEW AND REVISION OF MEMORANDUM OF COSTS.	0.75	243.75
757445	H	03/19/19	324	REVIEW RELEVANT DOCUMENTS, TRANSCRIPTS, ETC. IN PREPARATION TO DRAFT MOTION FOR FEES AND COSTS; BEGIN DRAFTING MOTION FOR ATTORNEYS' FEES AND COSTS ON BEHALF OF MICHAEL KIMMEL INDIVIDUALLY AND AS CO-TRUSTEE OF THE FAMILY TRUST.	5.00	1625.00
757448	H	03/20/19	324	CONTINUE WORK ON MOTION FOR FEES; RESEARCH AND ANALYZE FEES EXPENDED.	3.00	975.00
757452	H	03/21/19	324	REVIEW AND REVISE MOTION FOR FEES AND COSTS FOR KIMMEL.	3.00	975.00
757457	H	03/22/19	324	DRAFT AFFIDAVIT OF DONALD A. LATTIN IN SUPPORT OF MOTION TO FEES FOR KIMMEL.	1.00	325.00
757461	H	03/23/19	324	REVIEW AND REVISE MOTION FOR FEES AND COSTS AND AFFIDAVIT OF D. LATTIN IN SUPPORT OF FEES AND COSTS FOR MICHAEL KIMMEL.	1.00	325.00
757650	H	03/26/19	324	DRAFT WITHDRAWAL OF MEMORANDUM OF	0.50	162.50

#	Type	Date	Atty	Description	Hours	Amount
761683	H	05/02/19	324	FEES AND COSTS; DRAFT RESPONSE TO MOTION TO RETAX. PARTICIPATE IN CONFERENCE CALL WITH COURT ON ISSUES RELATED TO BENCH TRIAL.	0.25	81.25
761685	H	05/03/19	324	MEETING WITH D. LATTIN AND K. MATTEONI TO DISCUSS [REDACTED]	1.00	325.00
761693	H	05/06/19	324	REVIEW TRIAL STATEMENT FOR EQUITABLE CLAIMS.	0.50	162.50
761698	H	05/07/19	324	BEGIN REVIEW OF SEVENTH AMENDMENT ARGUMENT IN PREPARATION FOR BENCH TRIAL	0.50	162.50
761703	H	05/08/19	324	REVIEW CLOSING ARGUMENTS OF KEVIN SPENCER; REVIEW WENDY'S OBJECTIONS TO APPROVAL OF ACCOUNTINGS; REVIEW WENDY'S AMENDED COUNTERPETITION; REVIEW RELEVANT CASE LAW RE: SEVENTH AMENDMENT ARGUMENT.	1.50	487.50
761706	H	05/09/19	324	DRAFT ADDITIONS TO TRIAL STATEMENT ADDRESSING SEVENTH AMENDMENT ARGUMENT AND WENDY'S REQUEST FOR DECLARATORY JUDGMENT THAT TODD JAKSICK AND MICHAEL KIMMEL VIOLATED THE NO-CONTEST PROVISION OF THE FAMILY AND ISSUE TRUSTS.	1.25	406.25
761753	H	05/10/19	324	REVIEW TRIAL STATEMENT AND SUPPLEMENT TO AMENDED PETITION FILED BY WENDY'S COUNSEL; DISCUSS ISSUES RE: BENCH TRIAL WITH D. LATTIN.	0.50	162.50
763037	H	05/13/19	324	ADDRESS ISSUES CONCERNING TRIAL EXHIBITS; TRANSPORT EXHIBITS TO COURT AND ATTEND MORNING ARGUMENTS; REVIEW PROPOSED STIPULATION BETWEEN COUNSEL REGARDING BRIEFING SCHEDULE; FOLLOW UP DISCUSSION WITH D. LATTIN.	1.25	406.25
763043	H	05/14/19	324	VARIOUS DISCUSSIONS [REDACTED]	3.00	975.00
763049	H	05/15/19	324	REVIEW OF VARIOUS TRIAL EXHIBITS IN PREPARATION FOR EQUITABLE BRIEFING. REVIEW OF WENDY JAKSICK'S OFFER OF PROOF FOR ADMISSION OF EVIDENCE FOR TRIAL OF EQUITABLE CLAIMS.	0.25	81.25
763059	H	05/20/19	324	DRAFT MOTION TO STRIKE "SECOND SUPPLEMENT TO FIRST AMENDED COUNTER	1.25	406.25

#	Type	Date	Atty	Description	Hours	Amount
				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."		
763541	H	05/31/19	324	REVIEW MOTION TO REDACT FILED BY COUNSEL FOR STANLEY JAKSICK; REVIEW MOTION TO STRIKE FILED BY COUNSEL FOR STANLEY JAKSICK; REVIEW OPPOSITION TO MOTIONS TO STRIKE FILED BY COUNSEL FOR WENDY JAKSICK.	0.50	162.50
764078	H	06/03/19	324	REVIEW OF TRIAL TRANSCRIPT AND PRIOR PLEADINGS IN PREPARATION TO BEGIN DRAFTING REPLY IN SUPPORT OF MOTION TO STRIKE; BEGIN DRAFTING REPLY IN SUPPORT OF MOTION TO STRIKE.	1.50	487.50
764082	H	06/04/19	324	FINISH DRAFTING REPLY IN SUPPORT OF MOTION TO STRIKE.	2.50	812.50
764091	H	06/07/19	324	REVIEW DRAFT OF PETITIONER'S BRIEF ON EQUITABLE ISSUES.	1.50	487.50
766150	H	06/25/19	324	REVIEW WENDY JAKSICK'S EMERGENCY MOTION TO EXTEND DEADLINE TO FILE BRIEF OF OPENING ARGUMENTS IN THE EQUITABLE CLAIMS TRIAL AND OPPOSITIONS FILED ON BEHALF OF TODD JAKSICK.	0.50	162.50
766160	H	06/27/19	324	TELEPHONE COMMUNICATION WITH TODD JAKSICK CONCERNING REVISIONS TO TRIAL BRIEF ON EQUITABLE ISSUES.	0.50	162.50
768519	H	07/09/19	324	BEGIN REVIEW OF TRIAL STATEMENTS SUBMITTED BY COUNSEL FOR STAN JAKSICK AND COUNSEL FOR TODD JAKSICK INDIVIDUALLY.	1.00	325.00
768525	H	07/11/19	324	CONTINUE REVIEW OF TRIAL STATEMENTS SUBMITTED BY COUNSEL FOR STAN JAKSICK AND COUNSEL FOR TODD JAKSICK INDIVIDUALLY.	0.50	162.50
768534	H	07/15/19	324	CONTINUE READING OPENING BRIEF FILED BY WENDY JAKSICK ON ISSUES TO BE DECIDED BY THE JUDGE.	0.50	162.50
768537	H	07/17/19	324	DETAILED DISCUSSION WITH D. LATTIN AND K. MATTEONI CONCERNING [REDACTED]	0.75	243.75
768553	H	07/24/19	324	FINISH REVIEW OF BRIEF FILED BY WENDY JAKSICK ON BENCH TRIAL ISSUES.	0.50	162.50
768558	H	07/25/19	324	OFFICE CONFERENCE WITH D. LATTIN	0.75	243.75

#	Type	Date	Atty	Description	Hours	Amount
				AND K. MATTEONI CONCERNING [REDACTED]		
768564	H	07/29/19	324	REVIEW FINAL BRIEF ON EQUITABLE ISSUES TO BE TRIED BY THE COURT; REVIEW WENDY'S EMERGENCY MOTION TO COMPEL DISTRIBUTIONS FROM THE FAMILY TRUST.	1.50	487.50
768684	H	07/31/19	324	REVIEW RELEVANT DOCUMENTS AND BEGIN DRAFTING OPPOSITION TO WENDY'S EMERGENCY MOTION TO COMPEL DISTRIBUTION.	3.00	975.00
769026	H	08/01/19	324	FINISH DRAFTING OPPOSITION TO WENDY'S EMERGENCY MOTION FOR DISTRIBUTION.	4.50	1462.50
770017	H	08/05/19	324	REVIEW OBJECTION FILED BY COUNSEL FOR WENDY JAKSICK; OFFICE CONFERENCE WITH K. MATTEONI RE: [REDACTED]	0.50	162.50
770320	H	08/13/19	324	REVIEW WENDY'S REPLY IN SUPPORT OF MOTION TO COMPEL DISTRIBUTION FROM FAMILY TRUST.	0.50	162.50
770324	H	08/15/19	324	REVIEW OUR RESPONSE TO WENDY'S OBJECTION AND MOTION TO STRIKE.	0.25	81.25
771580	H	08/23/19	324	OFFICE CONFERENCE WITH D. LATTIN TO DISCUSS [REDACTED]	0.25	81.25
771591	H	08/28/19	324	DRAFT MEDIATION STATEMENT FOR MEDIATION BETWEEN TODD AND STAN JAKSICK.	0.50	162.50
776710	H	10/15/19	324	REVIEW LETTER FROM ZACH JOHNSON; CONFERENCE WITH D.LATTIN; DRAFT PROPOSED RESPONSE LETTER TO JOHNSON RE: ACCOUNTING FOR FAMILY TRUST.	1.00	325.00
785660	H	02/07/20	324	REVIEW ORDER FROM THE COURT REQUESTING SUPPLEMENTAL BRIEFING; OFFICE CONFERENCE WITH D. LATTIN AND K. MATTEONI RE: [REDACTED] CONFERENCE CALL WITH K. ROBINSON RE: [REDACTED]	1.50	525.00
				[REDACTED] DRAFT EMAIL TO K. MATTEONI DISCUSSING [REDACTED]		
785671	H	02/20/20	324	REVIEW EMERGENCY MOTION FOR CLARIFICATION OF ORDER FOR SUPPLEMENTAL BRIEFING AND MOTION TO STRIKE EVIDENCE OUTSIDE TRIAL RECORD FILED BY COUNSEL FOR WENDY JAKSICK AND APPLICATION FOR ORDER	0.75	262.50

#	Type	Date	Atty	Description	Hours	Amount
				SHORTENING TIME; OFFICE CONFERENCE WITH K. MATTEONI AND D. LATTIN REGARDING [REDACTED]		
786312!	H	02/26/20	324	REVIEW WENDY JAKSICK'S SUPPLEMENTAL BRIEF IN THE EQUITABLE CLAIMS TRIAL.	0.50	175.00
788587!	H	03/12/20	324	BRIEF REVIEW/SCAN OF ORDER ON EQUITABLE ISSUES; CONFERENCE WITH K. MATTEONI; TELEPHONE COMMUNICATION WITH TODD JAKSICK; TELEPHONE COMMUNICATION WITH MICHAEL KIMMEL; DRAFT UPDATE TO D. LATTIN.	2.00	700.00
788588!	H	03/13/20	324	REVIEW ORDER AFTER EQUITABLE TRIAL; CONFERENCE WITH D. LATTIN AND K. MATTEONI RE: [REDACTED]	2.75	962.50
788608!	H	03/18/20	324	OFFICE CONFERENCE REGARDING [REDACTED]	1.00	350.00
788610!	H	03/19/20	324	CONFERENCE WITH D. LATTIN CONCERNING [REDACTED]	1.00	350.00
				[REDACTED] OBTAIN UPDATED INFORMATION FOR MEMO OF COSTS.		
789798!	H	03/24/20	324	REVIEW MEMORANDUM OF COSTS FILED BY WENDY'S COUNSEL; REVIEW COURT'S ORDER ON EQUITABLE CLAIMS; DISCUSSION WITH D. LATTIN RE: [REDACTED]	5.50	1925.00
				[REDACTED] REVIEW MEMO OF COSTS FILED BY STAN JAKSICK; CONDUCT RELEVANT RESEARCH ON SPECIFIC REQUIREMENTS TO BE CONTAINED IN A MEMORANDUM OF COSTS.		
789800!	H	03/25/20	324	BEGIN DRAFTING MOTION TO RETAX; CONTINUE NECESSARY RESEARCH.	4.50	1575.00
789802!	H	03/26/20	324	FINISH DRAFTING MOTION TO RETAX; CONTINUE NECESSARY RESEARCH.	5.50	1925.00
789804!	H	03/27/20	324	REVIEW MOTION TO RETAX FILED BY COUNSEL FOR STAN JAKSICK.	0.50	175.00
GRAND TOTAL					<u>293.25</u>	<u>95943.75</u>

I - Transaction Not Yet Billed
H - Billable Time

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Fees for Brian C. McQuaid, Esq.

Fees for Brian C. McQuaid, Esq.

#	Type	Date	Atty	Description	Hours	Amount
729730	H	05/01/18	321	EMAILS AND CONFERENCES REGARDING [REDACTED]	0.50	175.00
730307	H	05/03/18	321	REVIEW DOCUMENTS DISCLOSED BY WENDY AND CONFERENCES REGARDING [REDACTED]	1.50	525.00
730272	H	05/07/18	321	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.50	175.00
730280	H	05/08/18	321	EMAILS AND CONFERENCE REGARDING [REDACTED] REVIEW NEW DEPOSITION NOTICES FILED BY KENT ROBISON FOR VARIOUS ENTITIES.	0.50	175.00
730475	H	05/15/18	321	REVIEW RECOMMENDATION FOR ORDER ISSUED BY DISCOVERY COMMISSIONER.	0.25	87.50
731564	H	05/16/18	321	CONFERENCES AND EMAILS REGARDING [REDACTED]	0.25	87.50
731561	H	05/25/18	321	REVIEW WENDY'S REQUESTS FOR PRODUCTION OF DOCUMENTS.	0.25	87.50
731792	H	05/31/18	321	CONFERENCE WITH DON LATTIN [REDACTED] [REDACTED] TELEPHONE CALL WITH TODD JAKSICK AND DON LATTIN.	0.75	262.50
733101	H	06/07/18	321	CONFERENCE REGARDING [REDACTED] [REDACTED]	0.50	175.00
733126	H	06/12/18	321	CONFERENCE REGARDING [REDACTED] [REDACTED]	0.50	175.00
733135	H	06/14/18	321	REVIEW VARIOUS DISCOVERY DISCLOSURES AND DEPOSITION TRANSCRIPT.	1.50	525.00
734295	H	06/19/18	321	REVIEW DISCOVERY MATERIALS.	0.50	175.00
734316	H	06/21/18	321	CONFERENCE REGARDING [REDACTED] [REDACTED] REVIEW ORDER DISMISSING CONSUMER FRAUD CLAIM ISSUED BY THE COURT. REVIEW AND ANALYZE DISCOVERY MATERIALS.	2.50	875.00
735224	H	07/09/18	321	EMAILS AND CONFERENCE REGARDING [REDACTED]	0.25	87.50
738483	H	08/07/18	321	CONFERENCE REGARDING [REDACTED] [REDACTED]	0.50	175.00
738509	H	08/10/18	321	CONFERENCES REGARDING [REDACTED] [REDACTED]	0.50	175.00
740987	H	09/05/18	321	RESEARCH ATTORNEY-CLIENT PRIVILEGE ISSUES AND CONFERENCES REGARDING SAME.	1.00	350.00
743628	H	10/15/18	321	CONFERENCE WITH DON LATTIN REGARDING [REDACTED] REVIEW ORDER REGARDING TODD JAKSICK'S DEPOSITION.	0.50	175.00
744571	H	10/19/18	321	EMAILS REGARDING [REDACTED]	0.25	87.50

#	Type	Date	Atty	Description	Hours	Amount
744587	H	10/23/18	321	[REDACTED] REVIEW VARIOUS ISSUES REGARDING INDEMNIFICATION AGREEMENT AND LITIGATION STRATEGY AND CONFERENCES REGARDING [REDACTED]	0.25	87.50
747317	H	11/26/18	321	TELEPHONE CALL WITH TODD JAKSICK REGARDING [REDACTED]	0.25	87.50
751247	H	01/15/19	321	DEPOSITION PREPARATION.	0.50	175.00
751627	H	01/17/19	321	DEPOSITION PREPARATION.	1.50	525.00
752748	H	01/22/19	321	DEPOSITION PREPARATION.	2.00	700.00
752750	H	01/23/19	321	DEPOSITION PREPARATION.	0.50	175.00
752755	H	01/24/19	321	ATTEND DEPOSITION AT MCDONALD CARANO.	4.00	1400.00
755133	H	02/19/19	321	EMAIL FROM CAROLYN RENNER REGARDING [REDACTED]	0.50	175.00
756048	H	03/05/19	321	CONFERENCES REGARDING [REDACTED] [REDACTED]	0.50	175.00
756054	H	03/06/19	321	EMAILS AND CONFERENCES REGARDING [REDACTED]	0.50	175.00
756059	H	03/07/19	321	EMAILS AND CONFERENCES REGARDING [REDACTED]	0.25	87.50
762323	H	05/06/19	321	CONFERENCES REGARDING [REDACTED] [REDACTED]	0.50	175.00
GRAND TOTAL					<u>24.25</u>	<u>8487.50</u>

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Fees for Kristen D. Matteoni, Esq.

Fees for Kristen D. Matteoni, Esq.

#	Type	Date	Atty	Description	Hours	Amount
743017	H	10/03/18	332	REVIEW CASE FILE IN PREPARATION OF DRAFTING MOTION FOR SUMMARY JUDGMENT (MIKE KIMMEL).	2.15	430.00
743316	H	10/08/18	332	LEGAL RESEARCH ON [REDACTED]	4.75	950.00
743323	H	10/09/18	332	LEGAL RESEARCH ON [REDACTED] [REDACTED] CONTINUE DRAFTING MOTION FOR SUMMARY JUDGMENT TO [REDACTED] [REDACTED] REVIEWED DEPOSITION TESTIMONY [REDACTED] [REDACTED] REVIEW DEPOSITION TESTIMONY [REDACTED] [REDACTED] BEGAN DRAFTING [REDACTED] [REDACTED] CONTINUED DRAFTING [REDACTED] [REDACTED]	6.00	1200.00
743329	H	10/10/18	332	REVIEW DEPOSITION TESTIMONY [REDACTED] [REDACTED] BEGAN DRAFTING [REDACTED] [REDACTED] CONTINUED DRAFTING [REDACTED] [REDACTED]	5.00	1000.00
743332	H	10/11/18	332	CONTINUED DRAFTING [REDACTED] [REDACTED]	2.00	400.00
743334	H	10/12/18	332	EDIT AND COMPILE RECORD CITATIONS [REDACTED]	1.00	200.00
746355	H	11/16/18	332	REVIEW WENDY JAKSICK'S OPPOSITION [REDACTED]	5.75	1150.00

#	Type	Date	Atty	Description	Hours	Amount
746883	H	11/19/18	332	TO MOTION FOR SUMMARY JUDGMENT IN PREPARATION OF DRAFTING REPLY BRIEF; BEGIN DRAFTING REPLY TO OPPOSITION TO MOTION FOR SUMMARY JUDGMENT REGARDING MR. KIMMEL; TRAVEL TO AND PARTICIPATE IN PRETRIAL HEARING. CONDUCT LEGAL RESEARCH AS TO [REDACTED] [REDACTED] DRAFT AND EDIT REPLY BRIEF TO WENDY'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT RE: MICHAEL KIMMEL; CONDUCT LEGAL RESEARCH AS TO [REDACTED] [REDACTED]	4.65	930.00
746890	H	11/20/18	332	COMPILE AND ATTACH EXHIBITS FOR REPLY TO MOTION FOR SUMMARY JUDGMENT; ADDITIONAL RESEARCH CONCERNING [REDACTED] [REDACTED]	2.25	450.00
746896	H	11/21/18	332	REVIEW RELEVANT DOCUMENTS PERTAINING TO NOTICE; DRAFT MEMORANDUM PERTAINING TO [REDACTED] [REDACTED] REVIEW WENDY'S MOTION FOR LEAVE TO JOIN INDISPENSABLE PARTIES AND PETITION TO REDRESS BREACH & EMERGENCY MOTION TO REMOVE TODD IN PREPARATION OF [REDACTED] RESEARCH PERTAINING TO [REDACTED] [REDACTED]	2.50	500.00
747498	H	11/26/18	332	EDIT MEMORANDUM PERTAINING TO [REDACTED] [REDACTED] REVIEW EMAILS FROM CO-COUNSEL REGARDING [REDACTED] [REDACTED] MEET WITH DON LATTIN TO DISCUSS	3.00	600.00

#	Type	Date	Atty	Description	Hours	Amount
				[REDACTED] DRAFT AND EDIT [REDACTED] RESEARCH [REDACTED] RESEARCH STANDARD FOR [REDACTED] [REDACTED] REVIEW CASE DOCUMENTS RELEVANT TO [REDACTED] [REDACTED]		
747502	H	11/27/18	332	FINISH DRAFTING AND EDIT OPPOSITION TO MOTION TO JOIN INDISPENSABLE PARTIES; RESEARCH [REDACTED]	1.00	200.00
				[REDACTED]		
747512	H	11/29/18	332	CONTINUE DRAFTING AND EDIT RESEARCH MEMORANDUM CONCERNING [REDACTED]	0.50	100.00
				[REDACTED]		
749918	H	12/26/18	332	REVIEW WENDY JAKSICK'S INITIAL DISCLOSURES OF EXPERT WITNESSES; LEGAL RESEARCH AS TO [REDACTED] [REDACTED]	1.75	350.00
				[REDACTED]		
749921	H	12/27/18	332	CONTINUE DRAFTING AND EDIT MOTION IN LIMINE TO [REDACTED] [REDACTED]	1.75	350.00
				[REDACTED]		
750338	H	12/31/18	332	INCORPORATE EDITS FROM CAROLYN RENNER INTO MOTION IN LIMINE TO [REDACTED]	0.25	50.00
				[REDACTED]		
750353	H	01/03/19	332	CONDUCT LEGAL RESEARCH AS TO [REDACTED] [REDACTED] COMPILE BUSINESS JUDGE RULE JURY INSTRUCTION. RESEARCH RELATED TO [REDACTED]	0.75	150.00
				[REDACTED]		
751077	H	01/07/19	332	OFFICER CONFERENCE AND EMAIL COMMUNICATION WITH DON LATTIN AND CAROLYN RENNER [REDACTED] [REDACTED] [REDACTED] BEGIN DRAFTING DEMAND LETTER REGARDING SAME. LEGAL RESEARCH RELATED TO [REDACTED]	1.00	200.00
				[REDACTED]		
751080	H	01/08/19	332	LEGAL RESEARCH RELATED TO [REDACTED]	2.50	500.00

#	Type	Date	Atty	Description	Hours	Amount
				[REDACTED]		
				LEGAL RESEARCH AND DRAFTING OF [REDACTED]		
				[REDACTED] REVIEW		
				EMAIL CORRESPONDENCE MARK CONNOT		
				AND KENT ROBISON [REDACTED]		
751084	H	01/09/19	332	CONDUCT LEGAL RESEARCH AND DRAFT A MEMORANDUM RELATED TO [REDACTED]	1.25	250.00
751091	H	01/10/19	332	REVIEW [REDACTED]	1.25	250.00
751932	H	01/14/19	332	CONTINUED [REDACTED]	1.00	200.00
752563	H	01/22/19	332	RESEARCH FOR [REDACTED]	1.50	300.00
				REVIEW 222 PAGES OF DISPOSITION TRANSCRIPT OF FRANK CAMPAGNA FOR [REDACTED]		
752566	H	01/23/19	332	REVIEW FINANCIAL STATEMENTS FOR [REDACTED]	2.00	400.00
				[REDACTED] LEGAL RESEARCH		
				RELATED TO [REDACTED]		
752575	H	01/24/19	332	EDIT MOTION IN LIMINE TO STRIKE OR EXCLUDE FRANK CAMPAGNA; COMPILE EXHIBITS FOR SAME.	0.75	150.00
753721	H	02/04/19	332	REVIEW MOTION TO CONTINUE; REVIEW CASE STATUS/UPDATE WITH CAROLYN RENNER AND KATIE ALLEN.	0.50	100.00

#	Type	Date	Atty	Description	Hours	Amount
753741	H	02/07/19	332	CONFERENCE WITH CAROLYN RENNER AS TO RESEARCH RELATED TO [REDACTED]	0.90	180.00
753748	H	02/08/19	332	OFFICE CONFERENCE WITH DON LATTIN AS TO [REDACTED]	0.50	100.00
754770	H	02/11/19	332	OFFICE CONFERENCE WITH DON LATTIN AS TO [REDACTED]	0.25	50.00
754783	H	02/15/19	332	ATTEND JAKSICK TRIAL OPENING STATEMENTS; POST-TRIAL BREAKDOWN WITH DON LATTIN.	6.00	1200.00
754804	H	02/19/19	332	JAKSICK TRIAL DEBRIEFING WITH DON LATTIN AND CAROLYN RENNER.	0.25	50.00
754809	N	02/20/19	332	ATTEND JAKSICK TRIAL - TODD JAKSICK TRIAL TESTIMONY.	1.50	300.00X
754812	H	02/20/19	332	ATTEND TRIAL AND TAKE NOTES FOR [REDACTED]	2.00	400.00
754817	H	02/21/19	332	ATTEND AND PARTICIPATE IN TRIAL; TAKE NOTES RELATED [REDACTED]	3.50	700.00
754823	H	02/22/19	332	ATTEND AND PARTICIPATE IN TRIAL (PIERRE DIRECT AND CROSS); TAKE NOTES RELATED TO SAME.	1.50	300.00
755593	H	02/25/19	332	ATTEND AND DENOTE TRIAL FOR [REDACTED]	2.25	450.00
755597	H	02/26/19	332	PARTICIPATE IN COURT MANDATED CONFERENCE AS TO PROPOSED JURY INSTRUCTIONS; ATTEND AND DENOTE TRIAL FOR [REDACTED]	3.00	600.00
755601	H	02/27/19	332	EDIT MASTER JURY INSTRUCTIONS CONSISTENT WITH COURT ORDERED MEETING WITH OPPOSING COUNSEL. GENERATE DEMONSTRATIVE EXHIBIT FOR CLOSING ARGUMENTS - [REDACTED]	2.50	500.00

#	Type	Date	Atty	Description	Hours	Amount
761452	H	05/02/19	332	CONTINUE LEGAL RESEARCH RELATED TO [REDACTED]	1.50	300.00
761458	H	05/03/19	332	CONFERENCE WITH CAROLYN RENNER, ESQ. AND DON LATTIN, ESQ. AS TO [REDACTED] DRAFT LIST OF WITNESSES FOR TRIAL STATEMENT; DRAFT LIST OF EXHIBITS (ADMITTED AND NEW) FOR TRIAL STATEMENT; BEGIN DRAFTING TRIAL STATEMENT.	3.00	600.00
761463	H	05/04/19	332	CONTINUE DRAFTING TRIAL STATEMENT; CONDUCT LEGAL RESEARCH RELATED TO [REDACTED]	2.75	550.00
762040	H	05/06/19	332	CONFERENCE WITH DON LATTIN, ESQ. AND CAROLYN RENNER, ESQ. AS TO [REDACTED] FINISH DRAFTING TRIAL STATEMENT; UPDATE EXHIBIT LIST TO TRIAL STATEMENT; LEGAL RESEARCH AS TO [REDACTED] COMMUNICATION WITH COURT CLERK AS TO JURY INSTRUCTIONS.	2.25	450.00
762047	H	05/07/19	332	CONFERENCE WITH DON LATTIN AS TO [REDACTED] UPDATE TRIAL STATEMENT TO REFLECT SAME; CREATE MASTER EXHIBIT LIST.	0.75	150.00
762052	H	05/08/19	332	FINAL REVIEW AND UPDATE OF RELEVANT TRIAL EXHIBITS; REVIEW CLOSING ARGUMENT OF KEVIN SPENCER, ESQ.; REVIEW DEPOSITION TESTIMONY OF KEVIN RILEY; REVIEW DEPOSITION TESTIMONY OF FRANK CAMPAGNA; REVIEW EXPERT REPORT OF JAMES GREEN.	1.50	300.00
762063	H	05/09/19	332	FINALIZE AND FILE TRIAL STATEMENT; TRIAL PREPARATION AS TO [REDACTED] REVIEW AND DENOTE KEY POINTS OF DEPOSITION TRANSCRIPT OF BRUCE WALLACE FOR USE IN TRIAL; REVIEW MOTIONS FILED BY WENDY'S COUNSEL INCLUDING PRETRIAL DISCLOSURES AND SUPPLEMENTAL PETITION.	1.50	300.00
762500	H	05/13/19	332	MARK EXHIBITS; ATTEND AND PARTICIPATE IN EQUITABLE CLAIMS TRIAL; DEBRIEFING OF SAME.	3.25	650.00
762507	H	05/14/19	332	REVIEW AND FINALIZE MASTER EXHIBIT LIST FOR EQUITABLE JURY TRIAL; REVIEW OF NEW EXHIBITS PROPOSED BY WENDY; BEGIN DRAFTING BRIEF ON	2.75	550.00

#	Type	Date	Atty	Description	Hours	Amount
				[REDACTED] CONFERENCE WITH CAROLYN RENNER, ESQ. AND DON LATTIN, ESQ. AS TO [REDACTED] [REDACTED] REVIEW MATERIALS REQUIRED TO [REDACTED] [REDACTED] CONFERENCE WITH BRIAN MCQUAID RELATED TO [REDACTED]		
762514	H	05/15/19	332	REVIEW EVIDENTIARY EXHIBITS BRIEF FROM WENDY'S COUNSEL; CONTINUE DRAFTING TRUSTEE'S BRIEF ON EVIDENTIARY OBJECTIONS; EDIT AND REVISE SAME FOR FILING; DRAFT HEGGSTAP PETITION CONCERNING [REDACTED]	5.50	1100.00
762519	H	05/16/19	332	BEGIN DRAFTING FINAL TRIAL BRIEF AS TO ACCOUNTINGS; REVIEW OF OPENING STATEMENTS AND TRIAL AND DEPOSITION TRANSCRIPTS AS NEEDED; EDIT AND REVISE [REDACTED]	2.50	500.00
762524	H	05/17/19	332	DRAFT, EDIT AND REVISE MOTION TO STRIKE WENDY JAKSICK'S REPLY TO OBJECTIONS TO ADMISSION OF ADDITIONAL DOCUMENTARY EVIDENCE IN REGARD TO EQUITABLE CLAIMS; FILE SAME.	0.75	150.00
763282	H	05/20/19	332	REVIEW CLOSING ARGUMENT TRIAL TRANSCRIPTS FOR USE IN FINAL BRIEF.	1.50	300.00
763288	H	05/21/19	332	LEGAL RESEARCH AS TO [REDACTED]	2.50	500.00
				[REDACTED]		
763299	H	05/23/19	332	DRAFT EQUITABLE CLAIMS BRIEF AS RELATED TO [REDACTED] [REDACTED] [REDACTED] EDIT AND REVISE [REDACTED]	1.50	300.00
763304	H	05/24/19	332	DRAFT DECLARATIONS OF K. ALLEN AND T. JAKSICK IN CONJUNCTION WITH PETITION RE: [REDACTED] COMPILE EXHIBITS FOR FERRARI PETITION; DRAFT NO-CONTEST CLAUSE PROVISIONS OF EQUITABLE CLAIMS TRIAL BRIEF.	1.50	300.00
763778	H	05/27/19	332	DRAFT INTRODUCTION TO EQUITABLE CLAIMS BRIEF; DRAFT ROUGH SECTION ON VALIDITY OF ACPAS.	1.50	300.00

#	Type	Date	Atty	Description	Hours	Amount
763784	N	05/28/19	332	CONFERENCE WITH D. LATTIN AND C. RENNER AS TO [REDACTED]	2.00	400.00X
763787	H	05/29/19	332	CREATE [REDACTED] BEGIN DRAFTING [REDACTED]	1.00	200.00
763801	H	06/01/19	332	FINISH DRAFTING ROUGH DRAFT OF EQUITABLE CLAIMS BRIEF.	1.50	300.00
763803	H	06/02/19	332	EDIT AND REVISE ROUGH DRAFT OF EQUITABLE CLAIMS BRIEF FOR EDITING BY C. RENNER, ESQ.	1.25	250.00
764978	H	06/11/19	332	INCORPORATE EDITS FROM CAROLYN RENNER, ESQ; REVIEW OF JURY TRIAL DAYS 1-3 AS NEEDED FOR SUPPORT IN FINAL EQUITABLE CLAIMS BRIEF.	2.50	500.00
765001	H	06/14/19	332	REVIEW JURY TRIAL TRANSCRIPTS AND ADMITTED TRIAL EXHIBITS TO SUPPORT CLAIMS IN FINAL EQUITABLE CLAIMS TRIAL BRIEF; MAKE REVISIONS TO BRIEF AS NECESSARY.	1.00	200.00
765009	H	06/15/19	332	REVIEW JURY TRIAL TRANSCRIPTS AND ADMITTED TRIAL EXHIBITS TO SUPPORT CLAIMS IN FINAL EQUITABLE CLAIMS TRIAL BRIEF; MAKE REVISIONS TO BRIEF AS NECESSARY.	1.25	250.00
765476	H	06/17/19	332	CONFERENCE WITH D. LATTIN RELATED TO [REDACTED]	3.00	600.00
765495	H	06/18/19	332	T/C WITH CLIENT TODD AND DON LATTIN ESQ. RELATED TO [REDACTED]	2.75	550.00
765509	H	06/19/19	332	FINALIZE CITATIONS AND EXHIBITS IN EQUITABLE CLAIMS BRIEF; T/C WITH JESSICA CLAYTON AND TODD JAKSICK AS TO [REDACTED] MAKE FINAL	1.50	300.00

#	Type	Date	Atty	Description	Hours	Amount
766505	H	07/01/19	332	REVISIONS AS NECESSARY AND FINAL READ THROUGH FOR FILING. REVIEW OF EQUITABLE CLAIMS BRIEF PRIOR TO FILING.	0.25	50.00
766533	H	07/07/19	332	DRAFT STIPULATION REGARDING [REDACTED] [REDACTED] BEGIN REVIEW OF WENDY'S EQUITABLE CLAIMS TRIAL BRIEF RELATED TO [REDACTED]	1.00	200.00
767521	H	07/09/19	332	EDIT AND REVISE STIPULATION RELATED TO TRUSTEES.	0.50	100.00
768244	H	07/15/19	332	FINISH REVIEW OF WENDY'S EQUITABLE CLAIMS BRIEF I PREPARATION OF DRAFTING RESPONSE.	2.00	400.00
768273	H	07/17/19	332	T/C WITH K. RILEY; T/C WITH TODD JAKSICK; CONFERENCE WITH C. RENNER AND D. LATTIN RELATED TO [REDACTED] [REDACTED]	2.00	400.00
768285	H	07/19/19	332	DRAFT REPLY BRIEF RELATED TO [REDACTED]	3.00	600.00
768891	H	07/22/19	332	CONTINUE DRAFTING REPLY BRIEF RELATED TO [REDACTED]	3.25	650.00
768898	H	07/23/19	332	REVIEW EMERGENCY MOTION FOR DISTRIBUTION FILED BY W. JAKSICK.	0.25	50.00
768903	H	07/24/19	332	CONTINUE DRAFTING REPLY BRIEF RELATED TO REMAINING CLAIMS.	3.25	650.00
768910	H	07/25/19	332	CONFERENCE WITH D. LATTIN AND C. RENNER TO [REDACTED] [REDACTED]	0.50	100.00
768913	H	07/25/19	332	FINISH DRAFTING REPLY BRIEF.	2.50	500.00
768920	H	07/26/19	332	EDIT AND REVISE REPLY BRIEF; INSERT EXHIBIT INFORMATION AND GATHER EXHIBITS FOR SAME.	2.00	400.00
769375	H	07/29/19	332	T/C WITH MICHAEL KIMMEL RELATED TO [REDACTED]	0.50	100.00
769379	H	07/30/19	332	EDIT REPLY BRIEF CONSISTENT WITH EDITS FROM D. LATTIN AND C. RENNER; COMPILE AND REDACT EXHIBITS FOR SAME.	1.00	200.00
769390	H	07/31/19	332	FINALIZE REPLY BRIEF FOR FILING. LEGAL RESEARCH RELATED TO [REDACTED] [REDACTED]	1.00	200.00
769395	H	08/01/19	332	REVIEW REPLY BRIEFS FILED BY STANLY	1.00	200.00

#	Type	Date	Atty	Description	Hours	Amount
769962	H	08/05/19	332	JAKSICK AND TODD JAKSICK CONFERENCE WITH C. RENNER RELATED TO [REDACTED] [REDACTED] LEGAL RESEARCH RELATED TO [REDACTED] [REDACTED]	1.00	200.00
769976	H	08/07/19	332	REVIEW WENDY'S REPLY TO MOTION FOR EMERGENCY DISTRIBUTION.	0.25	50.00
769985	H	08/08/19	332	BEGIN LEGAL RESEARCH RELATED TO [REDACTED]	0.25	50.00
770580	H	08/13/19	332	CONTINUE LEGAL RESEARCH RELATED TO [REDACTED] [REDACTED]	2.50	500.00
770582	H	08/14/19	332	DRAFT OPPOSITION TO WENDY'S OBJECTION AND MOTION TO STRIKE. EDIT AND REVISE OPPOSITION TO WENDY'S OBJECTION AND MOTION TO STRIKE.	0.25	50.00
770594	H	08/15/19	332	INCORPORATE EDITS FROM CAROLYN RENNER, ESQ. [REDACTED] [REDACTED]	0.25	50.00
772191	H	09/04/19	332	DRAFT EDIT AND REVISE PROPOSED ORDER GRANTING PETITION TO CONFIRM TRUST OWNERSHIP OF VEHICLE.	0.50	100.00
774249	H	09/23/19	332	REVIEW NEVADA SUPREME COURT DECISION [REDACTED] [REDACTED]	0.25	50.00
774264	H	09/25/19	332	CONFERENCE WITH ATTORNEY DON LATTIN RELATED TO [REDACTED] [REDACTED]	0.50	100.00
7848031	H	02/06/20	332	REVIEW ORDER FOR SUPPLEMENTAL BRIEFING.	0.25	68.75
7848061	H	02/07/20	332	INTRA OFFICE CONFERENCE WITH CAROLYN RENNER, ESQ. AND DON LATTIN, ESQ. RELATED TO [REDACTED] [REDACTED]	1.00	275.00
7852691	H	02/10/20	332	TELEPHONE CONFERENCE WITH DON LATTIN, KENT ROBISON, AND TODD JAKSICK REGARDING [REDACTED] [REDACTED]	5.25	1443.75

#	Type	Date	Atty	Description	Hours	Amount
785275!	H	02/11/20	332	TELEPHONE COMMUNICATION WITH TODD REGARDING [REDACTED]	8.00	2200.00
785286!	H	02/12/20	332	TELEPHONE COMMUNICATION WITH TODD JAKSICK REGARDING [REDACTED] CONTINUE REVIEW OF TRIAL EXHIBITS FOR USE IN [REDACTED]	4.00	1100.00
785287!	H	02/13/20	332	LOCATE, REVIEW AND UTILIZE ADDITIONAL FINANCIAL STATEMENT ACCOUNTINGS AND DISCLOSURES; EMAIL COMMUNICATION WITH KENT ROBISON, TODD JAKSICK, AND JESSICA CLAYTON REGARDING [REDACTED] FINISH DRAFTING, EDIT AND REVISE SUPPLEMENTAL BRIEF.	4.50	1237.50
785296!	H	02/14/20	332	TELEPHONE COMMUNICATION WITH TODD REGARDING [REDACTED] REVIEW SUPPLEMENTAL BRIEF BY TODD'S INDIVIDUAL COUNSEL; EDIT AND REVISE SUPPLEMENTAL BRIEF AS NECESSARY.	1.00	275.00
785932!	H	02/19/20	332	REVIEW TODD'S INDIVIDUAL BRIEF AND STAN'S BRIEF.	0.50	137.50
785940!	H	02/20/20	332	REVIEW EMERGENCY MOTION FILED BY WENDY JAKSICK AND REQUEST FOR ORDER SHORTENING TIME; CONFERENCE WITH CAROLYN RENNER, ESQ. AND DON LATTIN, ESQ. RELATED TO [REDACTED]	3.50	962.50
787695!	H	02/26/20	332	REVIEW WENDY'S SUPPLEMENTAL BRIEFING FILED FEB 25, 2019.	0.50	137.50
788170!	H	03/12/20	332	CAREFULLY REVIEW LENGTHY ORDER FORM THE COURT ON EQUITABLE CLAIMS; INTRAOFFICE CONFERENCE WITH DON LATTIN AND CAROLYN RENNER [REDACTED] TELEPHONE COMMUNICATION WITH TODD RELATED TO [REDACTED]	1.75	481.25
789559!	H	03/24/20	332	BRIEFLY CONDUCT LEGAL RESEARCH REGARDING [REDACTED]	1.00	275.00

04/02/2020 FEES FOR FEES FOR STAFF 332 FOR 17454.008 FROM 05/01/18 TO
04/01/20

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#	Type	Date	Atty	Description	Hours	Amount
				COMPILATION OF REQUIRED EXHIBITS FOR SAME.		
789570!	H	03/25/20	332	CONTINUE COMPILATION OF REQUIRED EXHIBITS FOR MEMORANDUM OF COSTS.	2.00	550.00
789577!	H	03/27/20	332	FINALIZE COMPILATION OF RECEIPTS AND EVIDENCE FOR USE IN MEMO OF COSTS.	4.00	1100.00
GRAND TOTAL					<u>219.45</u>	<u>45983.75</u>

X - No Charge Item
! - Transaction Not Yet Billed
H - Billable Time
N - Nonbillable Time

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Clerk of the Court
Transaction # 7828973

EXHIBIT 5

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EXHIBIT 5

23

1 CODE: 1952
2 DONALD A. LATTIN, ESQ.
3 Nevada Bar No. 693
4 CAROLYN K. RENNER, ESQ.
5 Nevada Bar No. 9164
6 KRISTEN D. MATTEONI
7 Nevada Bar No. 14581
8 MAUPIN, COX & LeGOY
4785 Caughlin Parkway
Reno, Nevada 89519
Telephone: (775) 827-2000
Facsimile: (775) 827-2185
Attorneys for Petitioners

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

10 IN AND FOR THE COUNTY OF WASHOE

11
12 In the Matter of the: Case No.: PR17-0445
Dept. No.: 15
13 SSJ's ISSUE TRUST.

14 _____ / Consolidated

15 In the Matter of the Administration of Case No.: PR17-0446
Dept. No.: 15
16 THE SAMUEL S. JAKSICK, JR., FAMILY TRUST.

17 _____ /

18 **PETITIONERS' VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS**

19 TODD B. JAKSICK, as sole Trustee of the SSJ Issue Trust and as Co-Trustee of the
20 Samuel S. Jaksick, Jr. Family Trust (hereafter the "Family Trust"), MICHAEL S. KIMMEL,
21 individually and as Co-Trustee of the Family Trust, and KEVIN RILEY, individually, as former
22 Trustee of the Family Trust, and Trustee of the Wendy A. Jaksick 2012 BHC Family Trust
23 (hereafter "Petitioners"), by and through their undersigned counsel, pursuant to NRS 18.005, *et*
24 *seq.*, hereby submit their Verified Memorandum of Costs and Disbursements incurred in this
25 action. A firm expense report and back-up documentation is attached hereto as Exhibits 1-6.
26

Summary of Costs and Disbursements

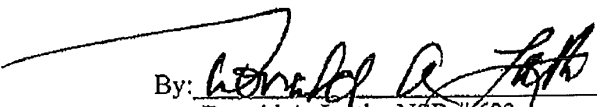
Court Filing Fees \$1,455.00
Reporter Fees For Depositions/Transcripts \$27,118.39
Petitioners' Expert Witness Fees \$33,938.47¹
Official Court Reporter Fees (hearing transcript) \$11,281.08
Legal Research Fees \$6,118.47
Other \$24,368.50
TOTAL \$104,279.93

NRS 239B.030 Affirmation

Pursuant to NRS 239B.030, the undersigned hereby affirms that this document does not contain the Social Security Number of any person.

Dated this 2nd day of April, 2020.

MAUPIN, COX & LEGOY

By: 
Donald A. Latin, NSB #693
Carolyn K. Renner, Esq., NSB #9164
Kristen D. Matteoni, Esq., NSB #14581
4785 Caughlin Parkway
Reno, NV 89519
Attorneys for Petitioners

¹Todd B. Jaksick, individually, by and through his counsel Robison, Sharp, Sullivan and Brust, claims a 1/8th interest in all expert witness costs recovered, as well as the expert deposition costs of Mr. Bruce Wallace. For the sake of efficiency, Maupin, Cox & LeGoy paid these invoices in full and thus notes the entire balance in its costs.

AFFIDAVIT OF DONALD A. LATTIN

STATE OF NEVADA)
)
COUNTY OF WASHOE) ss:

DONALD A. LATTIN, being first duly sworn, deposes and says:

1. That affiant is an attorney duly licensed to practice law in the State of Nevada and before the Court, that affiant is a shareholder with the law firm of Maupin, Cox & LeGoy, and counsel for PETITIONERS in this action. That affiant makes this Affidavit in support of Petitioners Verified Memorandum of Costs and Disbursements.

2. That affiant has personal knowledge of the above costs and disbursements expended in this matter by Maupin, Cox & LeGoy.

3. That the items contained in the above memorandum, which are supported by the Billed Costs Report of Maupin, Cox & LeGoy, are true and correct to the best of this affiant's knowledge and belief of the costs incurred in this litigation; and

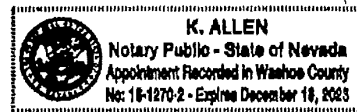
4. Affiant believes that the costs and disbursements are reasonable and have been necessarily incurred and paid in this action.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


DONALD A. LATTIN, ESQ.

SUBSCRIBED AND SWORN to before me
this 2 day of April, 2020.

K. Allen
Notary Public in and for said County and State



CERTIFICATE OF SERVICE

I hereby certify that I am an employee of MAUPIN, COX & LeGOY, Attorneys at Law,
and in such capacity and on the date indicated below I served the foregoing document(s) as follows:

Via E-Flex Electronic filing System:

Philip L. Kreitlein, Esq.
Stephen C. Moss, Esq.
Kreitlein Leeder Moss, Ltd.
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Reno, Nevada 89502
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*Attorneys for Stan Jaksick as Co-Trustee of
the Samuel S. Jaksick, Jr. Family Trust*

Mark Connot, Esq.
Fox Rothschild LLP
1980 Festival Plaza Drive, #700
Las Vegas, NV 89135
MConnot@foxrothschild.com

And

R. Kevin Spencer, Esq. (Pro Hac Vice)
Zachary E. Johnson, Esq. (Pro Hac Vice)
Spencer & Johnson PLLC
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kevin@dallasprobate.com
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Attorneys for Wendy A. Jaksick

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and as beneficiary, SSJ's Issue Trust and
Samuel S. Jaksick, Jr., Family Trust*

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sferguson@mcdonaldcarano.com
*Attorneys for Stan Jaksick, Individually, and
as beneficiary of the Samuel S. Jaksick, Jr.
Family Trust and SSJ's Issue Trust*

Via 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:

Alexi Smrt
3713 Wrexham
St Frisco, TX 75034

Luke Jaksick
Northern Arizona University
324 E. Pine Knoll Drive #12319
Flagstaff, AZ 86011

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Regan Jaksick Sydney Jaksick Sawyer Jaksick c/o Lisa Jaksick 5235 Bellazza Ct. Reno, Nevada 89519	Benjamin Jaksick Amanda Jaksick c/o Dawn E. Jaksick 6220 Rouge Drive Reno, Nevada 89511
--	---

Dated this 2 day of April, 2020.

B. Allen
EMPLOYEE

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4.	Official Court Reporter Fees (hearing transcript)	35
5.	Legal Research Fees	18
6.	Other	10

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Transaction # 7828973

EXHIBIT 6

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EXHIBIT 6

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4	AND SAMUEL S. JAKSICK, JR. FAMILY TRUST:		4	BY MR. LATTIN	732
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10	Reno, Nevada 89503			23.2 TJ1005 - TJ1007	
11			9	23.3 TJ1008 - TJ1034	
12	FOR PETITIONERS/CO-TRUSTEES TODD B. JAKSICK AND			23.4 TJ2572	
13	MICHAEL S. KIMMEL OF THE SSJ'S ISSUE TRUST AND SAMUEL		10	23.5 TJ1053 - TJ1057	
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15	MAUPIN, COX & LEGOV		11	23.7 TJ1062	
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23	470 E. Plumb Lane, Suite 310		15	23.15 TJ2575 - TJ2578	
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5	BY: MARK J. CONNOT, ESQ.		4	23.38 TJ1444 - TJ1445	
6	1980 Festival Plaza Drive, Suite 700			23.39 TJ1457 - TJ1458	
7	Las Vegas, Nevada 89135		5	23.40 TJ1547 - TJ1549	
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9	SPENCER & JOHNSON		6	23.42 TJ1079	
10	BY: R. KEVIN SPENCER, ESQ.			23.43 TJ1268	
11	- and -		7	23.44 TJ1270	
12	ZACHARY E. JOHNSON, ESQ.			23.45 TJ2252 - TJ2253	
13	500 N. Akard Street, Suite 2150		8	23.46 TJ1436	
14	Dallas, Texas 75201				
15	ALSO PRESENT:		9	27A TJ2416 - TJ2419	
16				27B TJ2420 - TJ2421	
17	TODD B. JAKSICK		10	27C TJ1585 - TJ1587	
18	STANLEY S. JAKSICK			27D TJ1579 - TJ1580	
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1 RENO, NEVADA, WEDNESDAY, JUNE 6, 2018, 9:00 A.M.
2 -000-
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6
7 THE VIDEOGRAPHER: We are going on record.
8 The date is Wednesday, June 6th, 2018, and the monitor
9 time is approximately 9:24 a.m.
0025:43 10 This is the video deposition of Wendy
11 Jaksick, Volume III, in the matter of SSJ's Issue
12 Trust. The case number is PR17-00445 as filed in the
13 Second Judicial District Court of the State of Nevada
14 in and for the County of Washoe.
0026:04 15 This deposition is being held at Robison,
16 Sharp, Sullivan & Brust, 71 Washington Street, Reno,
17 Nevada. The court reporter is Becky Van Auken of
18 Captions Unlimited. I am a certified court video
19 specialist. My name is Dejon Durlo of A Corrao Video.
0026:29 20 Counsel may proceed.
21 MR. ROBISON: Thank you.
22 /////
23 /////
24 /////
25 /////
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1 WENDY JAKSICK,
2 having been previously sworn, testified as follows:
3
4 CONTINUED EXAMINATION
0026:30 5 BY MR. ROBISON:
6 Q Good morning. I want to revisit one thing
7 we talked about yesterday, and that's that Quail Rock
8 transaction used as collateral for a loan to the
9 trust.
0026:43 10 A Yes.
11 Q Do you recall that dialogue that we had?
12 A Somewhat, yes.
13 Q Okay. As I understood your testimony --
14 correct me if I'm wrong -- you're of the understanding
0026:56 15 that the Quail Rock residence/office was used to
16 collateralize a loan that was made to the trust.
17 A It was -- from what I remember, it was used
18 as security for one of the either 115- or \$150,000
19 loan from the issue trust to the family trust.
0027:27 20 Q All right. And then I believe you said
21 that you were not pleased with that because the
22 security wound up with Todd?
23 A I -- I was not -- I didn't understand why,
24 first of all, that we had something that was valued at
0027:47 25 quite a bit more than the security, which I understand
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1 is, you know, necessary, but in this situation, when
2 Todd is the one who could make the -- make sure it was
3 paid on time, repaid on time, how it went into
4 default.
0028:03 5 Q Are you aware of the fact that the loan was
6 repaid?
7 A Um, that the loan was repaid? No. That
8 was not my understanding.
9 Q Are you aware that Quail Rock was not
0028:18 10 foreclosed on?
11 A Oh, no, I'm not talking about Quail Rock
12 being foreclosed on. I was talking about the de --
13 the loan went in -- the loan went into default, um,
14 and Quail Rock was sold.
0028:30 15 Q Right.
16 A Yeah.
17 Q But Todd didn't get any of that.
18 A Todd didn't get any of the proceeds from
19 Quail Rock?
0028:34 20 Q Right.
21 A He didn't.
22 Q The money went into the trust.
23 A The money went into the trust and then out
24 to Todd.
0028:44 25 Q The money from the sale of Quail Rock --
CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

499

1 A Right.
2 Q -- was paid -- the sale proceeds, net --
3 A Right.
4 Q -- was paid to the family trust. Okay?
0028:54 5 A Uh-huh.
6 Q Can you answer yes or no, please.
7 A Yes. I'm sorry. Yes.
8 Q I need to make sure that we have a record
9 on the exhibits that we've marked before I start again
0029:08 10 on 23.
11 MR. ROBISON: So that we're all on the same
12 page, Exhibit No. 1 is -- we've discussed at length,
13 as we have No. 2.
14 For the record, Exhibit No. 3 is the
0029:24 15 petition filed on behalf of the trustees dated
16 August 2nd, 2017.
17 Exhibit 4 that we've premarked is the
18 petition for confirmation of the trustees and
19 admission of trust to the jurisdiction of the court
0029:47 20 for the family trust. Exhibit 4 was the issue trust.
21 Exhibit 5 is the counterpetition filed by
22 Wendy Jaksick.
23 Exhibit No. 6 --
24 MR. CONNOT: Just -- If I could clarify --
25 MR. ROBISON: Sure.
CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

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1 fiduciary duties to the benefit of the beneficiaries
 2 of the trust?
 3 A Can you repeat that, please?
 4 Q Sure.
 5 Do you have anything that you can testify
 6 to of your own knowledge that Mr. Kimmel has done that
 7 is a breach of a fiduciary duty to you?
 8 MR. CONNOT: I'll just object to the form
 9 of the question to the extent it calls for a legal
 10 conclusion.
 11 But if you know, you can go ahead and
 12 answer.
 13 THE WITNESS: That I can discuss, no.
 14 BY MR. LATTIN:
 15 Q Okay. So you only have one bit of
 16 information that forms the basis for your claim
 17 against Mr. Kimmel, and it was in an email?
 18 A An email and then with conversation as
 19 well, yes.
 20 Q Conversation with who?
 21 A Stan.
 22 Q Now, we started this out by distinguishing
 23 between Mr. Kimmel as a trustee, and as a trustee he
 24 has certain duties to all beneficiaries of the trust.
 25 Not just you, all --
 CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

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1 A Right.
 2 Q -- beneficiaries.
 3 And you've sued him in his individual
 4 capacity; again, meaning separate and distinct from
 5 his duties as a trustee. Do you understand the
 6 distinction?
 7 A I do.
 8 Q Okay. Why have you sued him in his
 9 individual capacity?
 10 A Because he caused me harm by not -- well, I
 11 guess I don't know if this is the trustee part or
 12 the -- I guess I don't -- it's kind of a, you know,
 13 close -- a crossover, but he caused me harm by
 14 listening to Todd and never getting to know me and
 15 therefore voting against me because he thought that I
 16 was not a good person.
 17 Q How do you know that he voted against you
 18 because he thought you weren't a good person?
 19 A Um, well, I don't know that's why he voted
 20 against me, but his comments that I can't discuss were
 21 pretty -- they pretty much made you feel that way.
 22 Q So as you sit here, you do not know that
 23 Mr. Kimmel voted against you because he doesn't like
 24 you, do you?
 25 A I don't know.
 CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

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1 Q You don't know?
 2 A I don't know.
 3 Q Okay. And you could not testify under oath
 4 to the jury of anything that he did because he didn't
 5 like you, can you?
 6 A I thought his position was to protect me
 7 because he was a co-trustee, and that -- and he was
 8 not protecting me in -- in any way, shape, or form.
 9 Q Just because he voted against you or a
 10 position that you took, you think that he was wrong
 11 because he voted against you?
 12 A The extremes were -- yes.
 13 Q Do you know what the votes were?
 14 A Um, off the top of my head, no. I -- I
 15 know they were concerning helping me out and getting
 16 me money.
 17 Q Okay. And is this all information that's
 18 coming to you from Stan?
 19 A Yes.
 20 Q Because you weren't in the meetings.
 21 A I was not.
 22 Q Okay. Do you know if Stan attended all the
 23 meetings?
 24 A I believe they were by telephone. I'm not
 25 sure if he attend -- if he attended -- I know that
 CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

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1 they were on conference calls, I believe.
 2 Q Okay. And you have never picked up the
 3 phone to call Mr. Kimmel and have a discussion with
 4 him about anything related to the trust, have you?
 5 A No, I have not. I didn't -- I don't know
 6 him.
 7 Q And you have no basis to sue him in his
 8 individual capacity aside from being the trust
 9 fiduciary, do you?
 10 MR. CONNOT: Object to the form of the
 11 question.
 12 But if you know, you can answer.
 13 THE WITNESS: I don't know.
 14 BY MR. LATTIN:
 15 Q You don't know?
 16 A I don't know.
 17 Q Well, do you understand that you've put a
 18 man at risk and his personal assets at risk by suing
 19 him individually?
 20 A Yes.
 21 Q And you don't know why you did that?
 22 A I'm not -- I'm -- you asked me if I
 23 understand. I don't understand the law. I'm not a
 24 lawyer. I don't understand the specifics of what that
 25 position means.
 CAPTIONS UNLIMITED OF NEVADA, INC. (775) 746-3534

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1 Q You don't understand when you sue somebody
 2 individually, that you put their assets at risk?
 3 A What I understand is that there was a duty
 4 for him to perform and protect me, and he did not.
 5 Q We're talking about him as an individual,
 6 aside from his position as a trustee.
 7 A I see.
 8 Q Do you understand that?
 9 A That we're talking about him
 10 individually --
 11 Q Yes.
 12 A -- instead of -- instead of as a
 13 co-trustee --
 14 Q Yeah.
 15 A -- of my dad's trust.
 16 Q And do you understand that when you sue
 17 someone in their individual capacity, you put their
 18 assets at risk?
 19 A Yes.
 20 Q Okay. So when you sued him individually,
 21 you knew that you were putting his personal assets at
 22 risk; is that correct?
 23 A I -- I know that that's what that means.
 24 So I would assume yes.
 25 Q Okay. You knew that?

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1 A I -- I know -- I know what it means to sue
 2 someone and --
 3 Q Okay.
 4 A -- that that means that they can lose some
 5 assets, yes.
 6 Q Okay. And you cannot tell me what he's
 7 done -- I mean, the only reason he's here is because
 8 he's a trustee.
 9 A Correct.
 10 Q Not because of anything that he's done
 11 individually; is that correct?
 12 A That's correct.
 13 Q Okay. So he should not be named
 14 individually, should he?
 15 MR. CONNOT: Object to the form of the
 16 question.
 17 If you know, you can answer.
 18 THE WITNESS: Probably not.
 19 BY MR. LATTIN:
 20 Q Okay. Thank you.
 21 What about Mr. Riley? Mr. Riley has also
 22 been named individually. Has he done anything
 23 individually to harm you?
 24 A Yes.
 25 Q I'm talking now aside from his position as

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1 a trustee of either the family trust or the BHC trust.
 2 A So explain that to me.
 3 Q It's the same -- same process as I just
 4 went through with Mr. Kimmel.
 5 You know what it means to sue a person
 6 individually because you've told me you know that,
 7 correct?
 8 A I do know that. So what you're -- what
 9 you're saying with -- with Kevin is has he done
 10 anything when I've talked to him or has he done
 11 anything to harm me personally? Yes, he has.
 12 Q What -- what I'm talking about is you're
 13 suing yet another person in their individual capacity,
 14 putting their personal assets at risk.
 15 You understand that, correct?
 16 A Can I ask you a question?
 17 Q No, just --
 18 A Okay.
 19 Q -- I want you to answer my question.
 20 A Um --
 21 Q You've already told me --
 22 A -- yes.
 23 Q -- with regard -- okay. So you understand
 24 that. You understand --
 25 A Yes.

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1 Q -- by suing --
 2 A Yes.
 3 Q -- Mr. Riley --
 4 A Yes, I do.
 5 Q -- individually -- okay, thank you.
 6 A Absolutely.
 7 Q And, again, look at the two separate
 8 responsibilities that Mr. Riley has. He has a
 9 responsibility as a trustee, and then there's his
 10 individual capacity.
 11 What has he done in his individual
 12 capacity, aside from being a trustee, that has harmed
 13 you?
 14 A He's done a lot to me.
 15 Q Well --
 16 A He's caused me a lot of pain and suffering.
 17 Q Okay.
 18 A And my family.
 19 Q Okay. There is a day I see in this case
 20 when we're going to be sitting in front of a jury.
 21 A Yes.
 22 Q And I'm going to be asking you the same
 23 questions.
 24 A Okay.
 25 Q And I need to know what those are.

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EXHIBIT 7

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EXHIBIT 7

25

Case No. PR17-00445

Dept. No. 15

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

-oOo-

In the Matter of the:)
SSJ's ISSUE TRUST.)
AND RELATED ACTIONS.)

DEPOSITION OF MICHAEL STEPHEN KIMMEL

called for examination by counsel for Todd B. Jaksick,
Beneficiary SSJ's Issue Trust and Samuel S. Jaksick,
Jr., Family Trust pursuant to Notice, at the offices of
Robison, Sharp, Sullivan & Brust, 71 Washington Street,
Reno, Nevada, at 9:00 a.m., Friday July 6, 2018, before
Denise Hinxman, a Certified Court Reporter.

APPEARANCES: (See separate page)

COPY

Reported by:

DENISE HINXMAN, CCR No. 234, RDR, CRR, CRC

APPEARANCES:

FOR TODD B. JAKSICK, BENEFICIARY, SSJ'S ISSUE TRUST AND
SAMUEL S. JAKSICK, JR. FAMILY TRUST:

ROBISON, SHARP, SULLIVAN AND BRUST
BY: KENT R. ROBISON, ESQ
71 Washington Street
Reno, Nevada 89503

FOR PETITIONERS/CO-TRUSTEES TODD B. JAKSICK AND MICHAEL
S. KIMMEL OF THE SSJ'S ISSUE TRUST AND SAMUEL S.
JAKSICK, JR., FAMILY TRUST:

MAUPIN, COX & LEGOY
BY: DONALD A. LATTIN, ESQ.
4785 Caughlin Parkway
Reno, Nevada 89519

FOR STANLEY S. JAKSICK:
Not Present

MCDONALD CARANO
BY: SARAH FERGUSON, ESQ.
100 West Liberty Street, 10th Floor
P.O. Box 2670
Reno, Nevada 89505

FOR RESPONDENT WENDY A. JAKSICK:

FOX ROTHSCHILD LLP
BY: MARK J. CONNOT, ESQ.
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135

I N D E XEXAMINATION

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By Ms. Ferguson	142
By Mr. Connot	147

EXHIBITS (Originals retained by Robison's office)

28 Email from Carnival to Jaksick June 30, 2016	20
29 Email from W. Jaksick to S. Jaksick July 7, 2016	24
30 Email from W. Jaksick to Clayton June 20, 2017	79
31 Email from Carnival to Jaksick June 30, 2016	84
32 Email from S. Jaksick to Jessica Clayton July 28, 2017	87
33 Email from Bob LeGoy to Clayton July 29, 2017	91
34 Email from Bob LeGoy to Clayton August 1, 2017	100
35 Email from Bob LeGoy to Clayton August 4, 2017	105
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37 Meeting Notes November 29, 2017	110
38 Email from S. Jaksick to Jessica Clayton December 14, 2017	112
39 Email from W. Jaksick to S. Jaksick September 23, 2016	125
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1 RENO, NEVADA, FRIDAY, JULY 6, 2018, 9:00 A.M.

2 -000-

3
4 MICHAEL STEPHEN KIMMEL

5 (Witness sworn.)

6
7 EXAMINATION

8 BY MR. ROBISON:

9 Q Sir, would you please tell us your full
10 name.

11 A Yes. Michael Stephen, S-t-e-p-h-e-n,
12 Kimmel, K-i-m-m-e-l.

13 Q And what is your business or occupation?

14 A I'm an attorney.

15 Q And are you licensed to practice in the
16 state of Nevada?

17 A Yes, I am. Nevada and California.

18 Q When were you licensed in California?

19 A I sat for the bar exam in California in
20 February of 2005. I did not fill out and submit the
21 rest of the application, which is called the moral
22 character side of it, until probably the end of 2008 or
23 the beginning of 2009. So that's when I became
24 licensed in California.

25 Q And when were you licensed in Nevada?

1 me if my compensation equaled what that opportunity
2 cost was.

3 So what I proposed was I would just track
4 my time and bill it essentially on an hourly basis so
5 the trust could see what exactly what I did and how
6 much time I spent.

7 And he said he would have to go back to the
8 trustees and they would talk about it and have a vote.
9 And then --

10 Q I'm sorry, go ahead.

11 A I was going to say the next time I heard
12 from him was when he told me that the trustees had
13 voted to add me as a co-trustee.

14 Q And from that point on, when did you become
15 a co-trustee?

16 A I don't know when they formally voted on
17 it. My understanding is basically January of 2017.
18 That's the first time in early January of 2017 that I
19 had interaction with the other trustees as a group to
20 discuss trust matters.

21 Q Got it. You mentioned in your answer that
22 Todd provided you, I think, before your first meeting,
23 with trust documents. Would you look at Exhibit 13,
24 please.

25 A Yes.

Jayne Ferretto

From: eflex@washoecourts.us
Sent: Thursday, April 09, 2020 3:15 PM
To: Kent Robison
Cc: Jayne Ferretto
Subject: NEF: CONS: TRUST: SSJ'S ISSUE TRUST: Mtn for Attorney's Fee: PR17-00445

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
PROOF OF SERVICE OF ELECTRONIC FILING

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

Judge: HONORABLE DAVID A. HARDY

Official File Stamp: 04-09-2020:15:12:36
Clerk Accepted: 04-09-2020:15:13:43
Court: Second Judicial District Court - State of Nevada
Civil
Case Title: CONS: TRUST: SSJ'S ISSUE TRUST
Document(s) Submitted: Mtn for Attorney's Fee
- **Continuation
- **Continuation
- **Continuation
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- **Continuation
Filed By: Donald A Lattin

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

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

The following people were served electronically:

STEPHEN C. MOSS, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST
CAROLYN K. RENNER, ESQ. for KEVIN RILEY, TODD B. JAKSICK, MICHAEL S. KIMMEL
DONALD ALBERT LATTIN, ESQ. for KEVIN RILEY, TODD B. JAKSICK, MICHAEL S. KIMMEL
PHILIP L. KREITLEIN, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST

KENT RICHARD ROBISON, ESQ. for DUCK LAKE RANCH LLC, SAMMY SUPERCUB, LLC,
SERIES A, TODD B. JAKSICK, INCLINE TSS, LTD.

SARAH FERGUSON, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY
TRUST, SSJ'S ISSUE TRUST

MARK J. CONNOT, ESQ, for WENDY A. JAKSICK

THERESE M. SHANKS, ESQ. for DUCK LAKE RANCH LLC, SAMMY SUPERCUB, LLC,
SERIES A, TODD B. JAKSICK, INCLINE TSS, LTD.

ADAM HOSMER-HENNER, ESQ. for STANLEY JAKSICK

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

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16 zach@dallasprobate.com
17 *Attorneys for Respondent/Counter-Petitioner*
18 Wendy A. Jaksick

11 **SECOND JUDICIAL DISTRICT COURT**

12 **WASHOE COUNTY, NEVADA**

13 In the Matter of the Administration of the
14 SSJ'S ISSUE TRUST,

CASE NO.: PR17-00445
DEPT. NO. 15

15 In the Matter of the Administration of the
16 SAMUEL S. JAKSICK, JR. FAMILY TRUST,

CASE NO.: PR17-00446
DEPT. NO. 15

16 WENDY JAKSICK,

17 Respondent and Counter-Petitioner,

18 v.

19 TODD B. JAKSICK, INDIVIDUALLY, AS CO-
20 TRUSTEE OF THE SAMUEL S. JAKSICK, JR.
21 FAMILY TRUST, AND AS TRUSTEE OF THE
22 SSJ'S ISSUE TRUST; MICHAEL S. KIMMEL,
23 INDIVIDUALLY AND AS CO-TRUSTEE OF
24 THE SAMUEL S. JAKSICK, JR. FAMILY
25 TRUST; AND STANLEY S. JAKSICK,
26 INDIVIDUALLY AND AS CO-TRUSTEE OF
27 THE SAMUEL S. JAKSICK, JR. FAMILY
28 TRUST; KEVIN RILEY, INDIVIDUALLY AND
AS FORMER TRUSTEE OF THE SAMUEL S.
JAKSICK, JR. FAMILY TRUST AND TRUSTEE
OF THE WENDY A. JAKSICK 2012 BHC
FAMILY TRUST,

Petitioners and Counter-Respondents.

OMNIBUS OPPOSITION TO
MOTIONS TO STRIKE WENDY
JAKSICK'S VERIFIED
MEMORANDUM OF COSTS FILED
BY TRUSTEES

//

Wendy A. Jaksick (“Wendy”), by and through her undersigned counsel, files this *Omnibus Opposition to Motions to Strike Wendy Jaksick’s Verified Memorandums of Costs Filed by Trustees* (the “Opposition”) in opposition to the: (i) *Motion to Strike Verified Memorandum of Costs*, which was filed by Todd Jaksick, as Trustee of the SSJ’s Issue Trust and as Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust (“Family Trust”), Michael S. Kimmel, individually and as Co-Trustee of the Family Trust and Kevin Riley, Individually, as former Trustee of the Family Trust, and Trustee of the Wendy A. Jaksick 2012 BHC Family Trust, and (ii) *Motion to Retax Costs and Joinder to Motions to Strike*, which was filed by Stanley Jaksick, as Co-Trustee for the Family Trust. The Motions shall collectively be referred to herein as the “Motions to Strike”. As set forth below, the Court should deny the Trustees’ *Motions to Strike*.

I. ARGUMENT

1. Premature Filing of Wendy’s Memorandum of Costs. Trustees argue Wendy’s *Verified Memorandum of Costs* (“Memorandum of Costs”) should be stricken because it was filed before the judgment was entered. The Court entered its *Order After Equitable Trial* on March 12, 2020. On March 17, 2020, Stanley Jaksick, as Co-Trustee of the Family Trust, filed his *Verified Memorandum of Costs* (“Stan’s Memorandum of Costs”). On March 23, 2020, Wendy filed her *Memorandum of Costs*. The Court entered the *Judgment on Jury Verdict and Court Order on Equitable Claims* (“Judgment”) on April 1, 2020.

2. A judgment has been entered upon which Wendy is entitled to file a verified memorandum of costs. There is no authority confirming or supporting Trustees’ position that a verified memorandum of costs filed prior to the entry of judgment can or must be stricken when a judgment is ultimately entered. In fact, there is direct authority confirming that a memorandum of costs filed before a court enters its judgment is well within NRS 18.110’s deadline and is not improper. *Las Vegas Fetish & Fantasy Halloween Ball, Inc. v. Ahern Rentals, Inc.*, 124 Nev. 272, 278, 182 P.3d 764, 768 (2008) (“Although some parties may wait to file a memorandum of costs until after the district court enters judgment, waiting is not a

1 requirement. Here, Ahern filed its memorandum of costs even before the district court had
2 entered its judgment—well within NRS 18.110's deadline.”).

3 3. In the alternative, NRS 18.110 provides that a memorandum of costs may be
4 filed within “such further time as the court or judge may grant.” NRS 18.110. If the Court
5 determines it is necessary for Wendy to file her *Memorandum of Costs* after the entry of
6 judgment, Wendy requests the Court enter an order granting her leave to refile her
7 *Memorandum of Costs*. All parties received Wendy’s *Memorandum of Costs* and have filed
8 pleadings responding to same. Granting Wendy leave to refile her *Memorandum of Costs* will
9 not harm or disadvantage any other party.

10 4. Wendy Prevailing Party for Purposes of Costs. Trustees argue Wendy was not
11 a prevailing party because she did not prevail on all claims. *Motion to Strike*, p. 4, lines 6-7
12 (emphasis added).

13 5. Nevada’s statute governing the recovery of costs states that costs may be sought
14 by a “prevailing party” in whose favor a judgment is rendered. NRS 18.110. The statute does
15 require the “prevailing party” prevail on all claims. NRS 18.110. Nevada case law confirms
16 that a party qualifies as a “prevailing party” when it “succeed[s] on any significant issue in the
17 litigation which achieves some of the benefit sought in bringing the suit.” *City of Henderson*
18 *v. Las Vegas Review-Journal*, 450 P.3d 387 (Nev. 2019) (confirming that the party “‘need not
19 succeed on every issue’ to prevail.”).

20 6. The Trustees of the SSJ’s Issue Trust and Family Trust instituted this matter
21 seeking confirmation of: (i) their accountings, (ii) multiple Agreements and Consents to
22 Proposed Actions (“ACPAs”), (iii) Indemnification Agreements and (iv) their actions as
23 Trustees of the SSJ’s Issue Trust and Family Trust covering the period April, 2013 through
24 December, 2017. Wendy had no choice but to file claims concerning the accountings, ACPAs,
25 Indemnification Agreements and the Trustees’ administration of the Trusts or risk waiving her
26 claims and her opportunity to obtain information she was entitled to and otherwise protect her
27 rights.

1 7. The Jury returned a verdict after trial for Wendy against Todd Jaksick, as
2 Trustee of the SSJ's Issue Trust and the Family Trust, for breach of fiduciary duty and awarded
3 Wendy damages. *See Jury Verdict*. Additionally, after the equitable trial, the Court entered
4 the *Order*, which was incorporated into the *Judgment*, refusing to confirm the Accountings¹,
5 the ACPAs, the Indemnification Agreements, and denying Trustees' claims against Wendy for
6 violating the no-contest provisions of SSJ's Issue Trust and the Family. Additionally, the
7 Court, as confirmed in the *Judgment*, awarded Wendy equitable relief including: (i) the
8 disgorgement of Todd Jaksick's fees as Trustee of the SSJ Issue Trust and as Co-Trustee of
9 the Family Trust from the inception of his trusteeships, (ii) requiring Todd Jaksick, as Trustee
10 of the SSJ Issue Trust and as Co-Trustee of the Family Trust, to pay/reimburse twenty-five
11 (25%) of the attorney's fees paid by the SSJ Issue Trust and Family Trust associated with this
12 litigation, and (iii) ordering the SJJ Issue Trust and Family Trust to pay Wendy's attorney's
13 \$300,000 in attorney's fees. *See Judgment*.

14 8. The heart of this litigation was Wendy's claims related to the administration of
15 the Trusts including the preparation, content and delivery of the Accountings. The Jury
16 returning a verdict finding Todd Jaksick, as Trustee of the SSJ's Issue Trust and the Family
17 Trusts, breached his fiduciary duties in relation to the administration of the Trusts and awarded
18 damages. A result of Wendy's lawsuit, Wendy was: (i) awarded damages, (ii) awarded
19 Attorney's fees for pursuing this lawsuit to protect her rights a beneficiary, (iii) obtained the
20 disgorgement of all Trustees' fees paid to Todd Jaksick from the inception of his trusteeships
21 (because "Todd breached his fiduciary duties (and secondarily, this Court's findings about the
22 timing and contest of the accountings)," and (iv) obtained an order requiring all future Trust
23 accountings to be "timely and formulated to provide the beneficiaries with adequate notice of
24 values, transaction, and other acts of trust administration." *Order*, pages 16-17, lines 29-1; p.
25

26 ¹ The accountings sought to be confirmed by Trustees in their original Petitions instituting this
27 litigation were for the Issue Trust and Family Trust for the period April, 2013 through December,
28 2017 and Wendy's Sub-Trust for the period 2013 through 2016 (collectively, the
"Accountings").

24, lines 22-24. The above establishes that Wendy succeeded in her lawsuit on a significant issue in the litigation and achieved some of the benefit sought in bringing the lawsuit. *See City of Henderson*, 450 P.3d at 387 (confirming that a party qualifies as a “prevailing party” when it “succeed[s] on any significant issue in the litigation which achieves some of the benefit sought in bringing the suit.”) Accordingly, for purposes of costs statutes, Wendy was a “prevailing party” in relation to the SSJ’s Issue Trust and the Family Trust through Todd Jaksick, as Trustee of the SSJ’s Issue Trust and Co-Trustee of the Family Trust.

9. Invoices Supporting Wendy’s Memorandum of Costs. Trustees argue Wendy did not attach and submit actual invoices with her *Memorandum of Costs*, therefore it is impossible for the Court to determine whether the costs were actual and reasonable and award costs. Wendy has prepared and filed a *Motion for Leave and First Supplement to Verified Memorandum of Costs* (“Supplement”) that includes invoices and other documents evidencing and supporting the costs identified and outlined in her *Memorandum of Costs*. Wendy’s *Supplement* seeks leave for her filing, so that that the invoices and documents submitted with her *Supplement* maybe considered with and support of her *Memorandum of Costs*.

II. CONCLUSION

For the reasons set forth above, Wendy respectfully requests the court to deny Trustees’ *Motions to Strike*.

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AFFIRMATION STATEMENT

Pursuant to NRS 239B.030

The undersigned does hereby affirm that this **OMNIBUS OPPOSITION TO MOTIONS TO STRIKE WENDY JAKSICK'S VERIFIED MEMORANDUM OF COSTS FILED BY TRUSTEES** filed by Wendy A. Jaksick in the above-captioned matter does not contain the social security number of any person.

DATED this 9th day of April, 2020.

FOX ROTHSCHILD LLP

/s/ Mark J. Connot

Mark J. Connot (10010)
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135

SPENCER & JOHNSON, PLLC

/s/ R. Kevin Spencer

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Attorneys for Respondent/Counter-Petitioner
Wendy A. Jaksick d

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of FOX ROTHSCHILD LLP and that on this 9th day of April, 2020, I served a true and correct copy of **OMNIBUS OPPOSITION TO MOTIONS TO STRIKE WENDY JAKSICK'S VERIFIED MEMORANDUM OF COSTS FILED BY TRUSTEES** by the Court's electronic file and serve system addressed to the following:

Kent Robison, Esq.
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Samuel S. Jaksick, Jr. Family Trust*

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Attorneys for Stanley S. Jaksick

DATED this 9th day of April, 2020.

/s/ Doreen Loffredo
An Employee of Fox Rothschild LLP

2010
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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:

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, FOR
TRIAL ON EQUITABLE CLAIMS**

1 Todd Jaksick, individually, ("Todd") moves this Honorable Court for its order awarding
2 attorneys' fees and costs. On March 13, 2019, Todd filed his Motion for Order Awarding Costs
3 and Attorneys' Fees for himself individually, Duck Lake Ranch, LLC and Incline TSS, Ltd. That
4 motion was granted as set forth in the Court's Judgment filed in this matter on April 1, 2020. The
5 fees and costs awarded in the Court's Judgment are for the period of time from August 29, 2018
6 through and including March 4, 2019, the date of the jury's verdict. Based on the reasoning set
7 forth in the Court's Judgment and based upon Rule 68 of the Nevada Rules of Civil Procedure,
8 Todd is also entitled to an award of attorneys' fees and costs incurred from March 13, 2019 to and
9 including April 1, 2020, the date the Judgment herein was filed.

10 This motion is also based upon the attached points and authorities.

11 DATED this 10th day of April, 2020.

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

16 
17 KENT R. ROBISON
18 THERESE M. SHANKS
19 Attorneys for Todd B. Jaksick, Individually,
20 Incline TSS, Ltd., and Duck Lake Ranch, LLC

21 **POINTS AND AUTHORITIES**

22 Todd submits the following as and for his points and authorities in support of his motion
23 for an award of costs and attorneys' fees.

24 **I.**

25 **PROCEDURAL BACKGROUND**

26 1. On January 19, 2018, Wendy Jaksick ("Wendy") filed her improperly Verified
27 Counter-Petition against Todd individually. Thereafter, Todd responded and extensive discovery
28 and motion practice ensued.

2. On August 29, 2018, Todd served Wendy with Offers of Judgment affording her

1 the opportunity to be paid \$50,000 if she accepted the Offers of Judgment. Wendy rejected the
2 Offers.

3 3. On March 4, 2019, the Jury Verdict was entered in favor of Todd individually
4 against Wendy. (**Exhibit 1**)

5 4. On March 13, 2019, based on his Offers of Judgment (**Exhibits 2 and 3**), Todd,
6 Duck Lake Ranch, LLC and Incline TSS, Ltd. filed a Motion for Order Awarding Costs and
7 Attorneys' Fees. The motion was fully briefed.

8 5. On May 13, 2019, the Court commenced the trial on Wendy's equitable claims.
9 Additional exhibits were submitted, and Wendy's equitable claims were fully and completely
10 briefed by the parties.

11 6. On March 12, 2020, the Court entered its Order After Equitable Trial ("Court's
12 Order"). In the Court's Order, the Court granted Todd's Motion for Order Awarding Costs and
13 Attorneys' Fees. The Judgment awarded Todd \$68,834.07 in costs and \$436,331 for attorneys'
14 fees incurred by Todd individually from August 29, 2018, to and including March 13, 2019.

15 7. Todd has incurred additional costs from March 13, 2019, to April 1, 2020, the date
16 Judgment was entered, in an amount of \$4,749.67 (**Exhibits 6 and 7**). Todd has incurred
17 additional attorneys' fees from March 13, 2019, to April 1, 2020, the date Judgment was entered
18 in the amount of \$103,375.00 (**Exhibits 4 and 5**).

19 **II.**

20 **RELIEF REQUESTED**

21 The total costs and attorneys' fees incurred by Todd individually from March 13, 2019, to
22 and including April 1, 2020 is \$108,124.67. Todd is entitled to an order awarding \$108,124.67
23 against Wendy based on Todd's NRCP 68 Offers of Judgment and the Court's analysis thereof as
24 set forth in the Court's Order After Equitable Trial filed in this matter on March 12, 2020.

25 **III.**

26 **ANALYSIS**

27 The Court has thoroughly analyzed Todd's Offers of Judgment made pursuant to NRCP 68
28 in its Order After Equitable Trial. In doing so, the Court awarded Todd's costs and fees he

1 incurred up to the date of the Jury's Verdict. The same analysis applies to this motion. Wendy
2 refused to accept Offers of Judgment served upon her pursuant to NRCP 68. She did so in bad
3 faith. She had no reason to sue Todd individually. Soon after filing her Counter-Petition, Wendy
4 knew that her claims against Todd as an individual were frivolous and meritless. Not once in
5 these proceedings has Wendy identified a legitimate good faith basis for having sued Todd as an
6 individual.

7 The Court has astutely determined that Wendy was "particularly personal in her
8 allegations, the worst of which were harassing, vexatious **and without factual basis.**" (Emphasis
9 added, p. 5, Ins. 9-11 – Order After Equitable Trial ("Court's Order").) Likewise, the Court noted
10 that Wendy chose litigation over compromise. The Court also acknowledged that Wendy's legal
11 and equitable claims are grounded in the same common facts. The Court further explained that it
12 was asked by Wendy to consider her equitable claims based on identical facts and transactions she
13 placed before the jury. (*Id.*, p. 7, Ins. 7-9.) The Court referred to Wendy's attempt to reargue facts
14 and evidence for her equitable claims that were over argued to the jury as a "mulligan". (*Id.*, Ins.
15 20-22.)

16 Wendy was not awarded **any** money in the Court's Order. Wendy is awarded no money in
17 the Judgment filed in this matter. Wendy neither accepted the Offers of Judgment nor recovered
18 sums equal to or in excess of those offered in Todd's Offers of Judgment. Accordingly, pursuant
19 to NRCP 68(f)(1), Wendy cannot recover any costs or attorneys' fees and shall not recover any
20 interest. However, she must pay Todd's post-offer costs, applicable interest on the Judgment from
21 the time of the Offer to the time of entry of Judgment, in addition to reasonable attorneys' fees.
22 NRCP 68(f)(2).

23 IV.

24 CONCLUSION

25 The Court has thoroughly considered and aptly applied the factors set forth in *Beatty v.*
26 *Thomas*, 99 Nev. 579, 668 P.2d 268 (1983) to Wendy's rejection of Todd's Rule 68 Offers of
27 Judgment. That same analysis applies to the post-verdict costs and fees incurred by Todd
28 individually in defending against Wendy's claims in equity. The Offers of Judgment Todd served

1 on Wendy allowed Wendy to take judgment against Todd for \$50,000. The Court's Judgment
2 makes no monetary finding or award of money in favor of Wendy. Therefore, pursuant to the
3 Court's analysis, reasoning and application of NRCP 68, Todd is entitled to an additional award of
4 attorneys' fees and costs in the total amount of \$108,124.67. This amount is shown and verified in
5 the attached affidavit and exhibit affixed thereto.

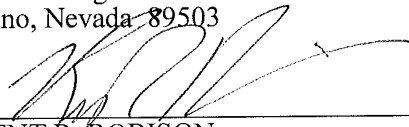
6 **AFFIRMATION**

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

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

10 Respectfully submitted this 10th day of April, 2020.

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

15 
16 KENT R. ROBISON
17 THERESE M. SHANKS
18 *Attorneys for Todd B. Jaksick, Individually,*
19 *Incline TSS, Ltd., and Duck Lake Ranch, LLC*

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

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.

4. Attached hereto as **Exhibit 3** 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.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of Robison, Sharp, Sullivan & Brust's "Detail Fee Transaction File List" of the attorneys' fees incurred by Todd Jaksick, individually, in Case No. PR17-00446 (Account No. 1368.002) from March 13, 2019, to and including April 1, 2020, in the total amount of 38,397.50, which includes time for attorneys Kent R. Robison, Therese M. Shanks and Hannah E. Winston.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of Robison, Sharp, Sullivan & Brust's "Detail Cost Transaction File List" of the costs incurred by Todd Jaksick,

1 individually, in Case No. PR17-00445 (Account No. 1368.001) from March 13, 2019, to and
2 including April 1, 2020, in the total amount of \$4,730.44.

3 8. Attached hereto as **Exhibit 7** is a true and accurate copy of Robison, Sharp,
4 Sullivan & Brust's "Detail Cost Transaction File List" of the costs incurred by Todd Jaksick,
5 individually, in Case No. PR17-00446 (Account No. 1368.002) from March 13, 2019, to and
6 including April 1, 2020, in the total amount of \$19.23.

7 DATED this 16th day of April, 2020.

8

9

10

11 STATE OF NEVADA)
12 COUNTY OF WASHOE) ss

13 Subscribed and Sworn to Before me this
14 16th day of April, 2020, by
Kent R. Robison.

15

16 NOTARY PUBLIC

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Robison, Sharp,
Sullivan & Brust
71 Washington St.
Reno, NV 89503
(775) 329-3151

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 **MOTION FOR ORDER AWARDING COSTS AND ATTORNEYS' FEES FOR TODD JAKSICK, INDIVIDUALLY, FOR TRIAL ON EQUITABLE CLAIMS** on all parties to this action by the method(s) indicated below:

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:

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

Donald A. Lattin, Esq.

Carolyn K. Renner, Esq.

Kristen D. Matteoni, Esq.

Maupin, Cox & LeGoy

4785 Caughlin Parkway

P. O. Box 30000

Reno, Nevada 89519

Email: dlattin@mcllawfirm.com

crenner@mcllawfirm.com

kmatteoni@mcllawfirm.com

Attorneys for Petitioners/Co-Trustees

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

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Kreitlein Law Group

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Sarah A. Ferguson, Esq.

McDonald Carano

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Reno, NV 89505

Email: ahosmerhenner@mcdonalddcarano.com / sferguson@mcdonalddcarano.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

Mark J. Connot, Esq.

Fox Rothschild LLP

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Email: mconnot@foxrothschild.com

Attorney for Respondent Wendy A. Jaksick

R. Kevin Spencer, Esq. / Zachary E. Johnson, Esq.

Spencer & Johnson PLLC

500 N. Akard Street, Suite 2150

Dallas, Texas 75201

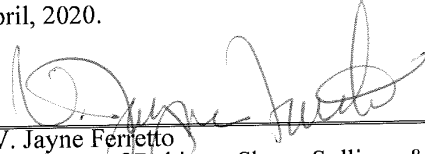
Email: kevin@dallasprobate.com / zach@dallasprobate.com

Attorneys for Respondent Wendy A. Jaksick

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- _____ 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 10th day of April, 2020.



V. Jayne Ferretto
Employee of Robison, Sharp, Sullivan & Brust

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EXHIBIT LIST

<u>Exhibit No.</u>	<u>Description</u>	<u>Pages</u>
1	Verdict	4
2	Offer of Judgment	5
3	Offer of Judgment	5
4	RSSB Detail Fee Transaction File List – PR17-00445 Account No. 1368.001	11
5	RSSB Detail Fee Transaction File List – PR17-00446 Account No. 1368.002	11
6	RSSB Detail Cost Transaction File List – PR17-00445 Account No. 1368.001	1
7	RSSB Detail Cost Transaction File List – PR17-00446 Account No. 1368.002	1

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2020-04-10 02:52:40 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

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,
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; SAMMY SUPERCUB
LLC, SERIES A,

CASE NO.: PR17-00446

DEPT. NO.: 15

VERDICT

Respondents.

/ / /

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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.)

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1 1. We, the jury, duly impaneled in the above-entitled
2 action, having found in favor of Petitioner, Wendy Jaksick, on
3 one or more of her claims against one or more of the
4 Respondents, find that she has proven by a preponderance of
5 evidence the amount of her damages, assess her damages to be
6 \$ 15,000.⁰⁰
7

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

(Please circle only one for each line item)

11 KEVIN RILEY	YES	<input checked="" type="radio"/> NO
12 STAN JAKSICK	YES	<input checked="" type="radio"/> NO
13 TODD JAKSICK	YES	<input checked="" type="radio"/> NO
14 MICHAEL KIMMEL	YES	<input checked="" type="radio"/> NO

15 DATED this 4 day of March, 2019.
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Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

EXHIBIT 2

EXHIBIT 2

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,

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

22 Respondent and Counter-Petitioner,
23 v.

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 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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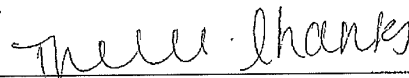
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AFFIRMATION
Pursuant to NRS 239B.030

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, 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
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blegoy@mcllawfirm.com
bmcquaid@mcllawfirm.com
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*

Phil Kreitlein, Esq.
Stephen C. Moss, Esq.
Kreitlein Law Group
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Attorneys for Stanley S. Jaksick, Co-Trustee Samuel S. Jaksick Jr., Family Trust

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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*

Mark J. Connot, Esq.
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Las Vegas, Nevada 89135
Email: 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 / zach@spencerlawpc.com
7 *Attorneys for Respondent Wendy A. Jaksick*

8 ☐ by using the Court's CM/ECTF 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 29th day of August, 2018.

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

FILED
Electronically
PR17-00445
2020-04-10 02:52:40 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

EXHIBIT 3

EXHIBIT 3

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

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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

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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.

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,

Petitioners and Counter-Respondents

CASE NO.: PR17-00446

DEPT. NO.: 15

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

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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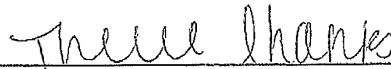
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AFFIRMATION
Pursuant to NRS 239B.030

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



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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:

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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 29th day of August, 2018.

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

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EXHIBIT 4

EXHIBIT 4

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	03/18/2019	KRR	A	9	400.00	1.10	440.00 (50%) Receive, review Zach Johnson's May 15th letters and start draft of response to both (.4). Office conference with Don Lattin and Todd Jaksick concerning post verdict matters and developments (1.8).	ARCH
1368.001	03/18/2019	JS	A	9	110.00	0.80	88.00 Review and update trial exhibit binders for missing/incomplete exhibits (.8).	ARCH
1368.001	03/19/2019	JS	A	9	110.00	0.50	55.00 Continue with updating trial exhibits binders.	ARCH
1368.001	03/20/2019	JS	A	9	110.00	0.80	88.00 Continue with review and updating of trial exhibit binders (.8).	ARCH
1368.001	03/21/2019	TMS	A	9	250.00	1.50	375.00 Review opposition to memorandum of costs (0.5); research re same (0.5); analysis re best next steps (0.5)	ARCH
1368.001	03/21/2019	KRR	A	9	400.00	2.64	1,056.00 (60%) Work on withdraw of memorandum of costs (.7). Receive response from Wendy's counsel concerning Todd's request for judgment on jury verdict (.7). Start preparation of reply thereto (.8). Response to letter suggesting that Todd resign (.7). Redraft, revise and finalize and sent to all counsel (.7). Search 54(b) certification finality issues with regard to bifurcation of equitable claims versus legal claims (.8).	ARCH
1368.001	03/22/2019	TMS	A	9	250.00	2.50	625.00 Review and analyze opposition to motion for judgment (0.5); Draft notice of withdrawal of memo of costs and emails re same (0.2); draft reply ISO mtn for entry of judgment (1.5); edit (0.3)	ARCH
1368.001	03/22/2019	JS	A	9	110.00	1.00	110.00 Continue with review and updating of trial exhibit binders (working and clean).	ARCH
1368.001	03/25/2019	JS	A	9	110.00	0.50	55.00 Continue with updating and completing trial exhibit binders.	ARCH
1368.001	03/25/2019	KRR	A	9	400.00	2.76	1,104.00 (60%) Work on Todd's opposition with Therese to Wendy's motion to retax costs and her opposition to memorandum of costs (1.8). Work on Jen & research concerning availability of motions for summary judgment concerning res judicata/claim preclusion/issue preclusion for indemnification claims and all claims pertinent to "unjust enrichment" otherwise categorized as a claim inequity (2.8)	ARCH
1368.001	03/26/2019	TMS	A	9	250.00	1.00	250.00 Review Wendy opposition to motion for fees, outline areas research (0.5); research re pre-offer and post-offer costs (0.5)	ARCH
1368.001	03/26/2019	KRR	A	9	400.00	1.08	432.00 (60%) Finalize, proof read of Todd Jaksick's reply to Wendy's opposition for motion for entry of judgment on jury verdict. Read and review GSR Points and Authorities to incorporate best cases in reply.	ARCH
1368.001	03/27/2019	TMS	A	9	250.00	2.50	625.00 Research re whether fees and pre-offer costs are considered in determining whether judgment obtained was better (1); outline reply (0.5); begin draft reply (1)	ARCH
1368.001	03/27/2019	JS	A	9	110.00	1.00	110.00 Continue with review of all trial exhibit binders to update and complete binders.	ARCH
1368.001	03/28/2019	TMS	A	9	250.00	2.00	500.00 Finish draft reply (1); edit (0.5); further research re offer of judgment comparison and pre-offer interest, fees and costs (0.5)	ARCH
1368.001	03/28/2019	JS	A	9	110.00	0.50	55.00 Update/revise trial exhibit binders.	ARCH
1368.001	04/01/2019	KRR	A	9	400.00	1.44	576.00 (60%) Continue work on reply to Wendy's opposition to motions for attorney's fees. Dictate affidavit concerning credentials and qualifications. Work on distinguishing De's interpretation of "court prevailing party".	ARCH
1368.001	04/09/2019	KRR	A	9	400.00	2.40	960.00 (60%) Review all pending motions in preparation for meeting with client, including memorandum of	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	04/16/2019	KRR	A	9	400.00	1.10	440.00	ARCH
							costs, motion for fees, motion for entry of judgment on jury verdict (.6). Office conference with Don Lattin and Todd Jaksick to review status of preparation for claims and equity (2.2). Start work on NRCP 16 request for status conference (.4). Work on preliminary research regarding availability of summary judgment motion based on res judicata for unjust enrichment claim (.8).	
1368.001	04/17/2019	TMS	A	9	250.00	0.70	175.00	ARCH
1368.001	04/17/2019	KRR	A	9	400.00	1.32	528.00	ARCH
							(50%) Prepare for office conference with Jessica and Todd by reviewing court's orders for May trial. Draft motion for pre-trial status conference. Office conference with Jessica and Todd.	
							edit MIL re inconsistent verdicts	
							(60%) Prepare motion for rule 16 pre-trial status conference (.9). Sent to Don and incorporated changes suggested (.5). Draft first iteration of Motion in Limine/MSJ regarding unjust enrichment (.8).	
1368.001	04/19/2019	KRR	A	9	400.00	1.10	440.00	ARCH
							Finished MSJ/motion in limine regarding Wendy's unjust enrichment claims. Filed same.	
1368.001	04/30/2019	KRR	A	9	400.00	1.80	720.00	ARCH
							(60%) Start work on trial statement (.9). Research Nevada law on constructive trust and unjust enrichment (1.1). Receive and start analysis of Wendy's opposition to motion in limine/MSJ (.8). Process request for submission on motion for status conference (.2).	
1368.001	05/01/2019	KRR	A	9	400.00	1.92	768.00	ARCH
							(60%) Receive and thoroughly review Wendy's opposition to Todd's motion in limine/MSJ; start rough draft of reply; analyze cases cited by Wendy in her opposition (.9). Did additional research on Nevada cases concerning constructive trust and unjust enrichment blended with contract (.5). Inter-office conference with Therese regarding trial statement and reply (.4). Work with Jim on retrieving exhibit books and exhibit list to determine which exhibits, if any, Todd will use at equity trial (.8). Review pleadings both by Todd and Wendy to determine whether declaratory relief action applies to indemnification agreement interpretation and enforceability thereof (.6).	
1368.001	05/01/2019	JS	A	9	110.00	1.00	110.00	ARCH
							Attend conference with Kent Robison and Therese Shanks to review status and strategy for trial (.5). Locate and prepare documents/information for Kent Robison (.5).	
1368.001	05/01/2019	TMS	A	9	250.00	1.00	250.00	ARCH
							Review opposition to MIL (0.5); meeting re next steps for upcoming trial (0.5)	
1368.001	05/02/2019	JS	A	9	110.00	2.10	231.00	ARCH
							Prepare for and attend conferences with Kent Robison, Therese Shanks, Lattin to review status and trial strategy (.8). Attend phone status hearing (.5). Locate and prepare documents/information for Kent Robison (.8).	
1368.001	05/02/2019	TMS	A	9	250.00	2.00	500.00	ARCH
							Meeting with co-counsel (0.5); court call (0.5); meeting with client (0.5); begin research re trial statement (0.5)	
1368.001	05/02/2019	KRR	A	9	400.00	1.62	648.00	ARCH
							(60%) Meeting with Don Lattin and Todd Jaksick to prepare for telephone conference with Judge Hardy (.7). Pre-trial status conference with Judge Hardy regarding trial on equitable claims (.8). Strategy conference with Todd and Don Lattin for trial strategy evidence and witness identification (1.2).	
1368.001	05/03/2019	JS	A	9	110.00	1.80	198.00	ARCH
							Telephone conference with Kent Robison to review my assignments (.3). Review and revise 500 trial exhibits for completeness (1.0). Locate, prepare and send documents/information to Kent Robison (.3).	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	05/03/2019	TMS	A	9	250.00	4.00	1,000.00	ARCH
							Contact Mark Ivey regarding A.V. for trial (.2). Research re trusts as contracts (0.25); research re seventh amendment right to jury (0.25); draft reply (1.5); edit (0.5); research re constructive trust and unjust enrichment issues (0.5); draft new trial statement (1)	
1368.001	05/06/2019	KRR	A	9	400.00	1.26	504.00	ARCH
							(70%) Work on trial statement (1.1). Review exhibit list to determine which exhibits will be relied on and correspondence with Linda Shaw concerning transcripts (.7).	
1368.001	05/06/2019	JS	A	9	110.00	3.80	418.00	ARCH
							Conference with Kent Robison to review my assignments and case status (.3). Locate and prepare documents/information for Kent Robison (.5). Review trial exhibits for new exhibits and marked exhibits (1.5). Begin lists of exhibits marked and admitted (1.5).	
1368.001	05/06/2019	TMS	A	9	250.00	1.50	375.00	ARCH
							Research re failure to supplement prior to eve of trial and inclusion in trial statement (1); review with KRR re upcoming trial (0.5)	
1368.001	05/07/2019	JS	A	9	110.00	4.10	451.00	ARCH
							Multiple conferences with Kent Robison to review my assignments and exhibits for trial statement (1.0). Work on lists of admitted excluded exhibits (1.0). Prepare for and attend conference with Kent Robison, Lattin, client (1.3). Locate and prepare document/information for Kent Robison (.5). Three telephone conferences with court clerk (.3).	
1368.001	05/07/2019	TMS	A	9	250.00	1.00	250.00	ARCH
1368.001	05/07/2019	KRR	A	9	400.00	3.85	1,540.00	ARCH
							edit trial statement (0.25); client meeting (0.75) (70%) Emails regarding retention of Mark Ivey for equity trial (.5). Telephone conference with Todd (.25). Telephone conference with Don (.25). Arrange for meeting (1). Office conference with Todd and Don to coordinate preparation of trial statement in response to Judge Hardy's directives (2.2). Start draft of trial statement (facts/introduction/overview) in conjunction with Therese's work on legal issues (2.2).	
1368.001	05/08/2019	JS	A	9	110.00	3.80	418.00	ARCH
							Multiple conferences with Kent Robison to review case status and my assignments (.8). Review and update exhibit binders (working and clean) (1.5). Review and revise exhibit index for court (1.5).	
1368.001	05/08/2019	KRR	A	9	400.00	0.60	240.00	ARCH
							(50%) Trial preparation by reviewing various portions of Wendy's testimony and review of pertinent exhibits to be presented, finished, worked on and prepare rough draft of Todd's trial statement.	
1368.001	05/09/2019	JS	A	9	110.00	2.70	297.00	ARCH
							Continue with review and updating of all exhibit binders (.8). Continue with review and revision of court trial exhibit index (1.0). Review Lattin trial statement (.2). Locate and prepare new exhibit (.5). Two telephone conferences with Mark Ivey (.2).	
1368.001	05/09/2019	KRR	A	9	400.00	0.96	384.00	ARCH
							(80%) Complete Trial Statement regarding Claims in Equity. Work on list of witnesses and additional exhibits to be admitted showing as stipulated.	
1368.001	05/10/2019	JS	A	9	110.00	4.30	473.00	ARCH
							Review Wendy trial statement and assemble exhibits (1.0). Review, revise and update or exhibit binders (1.0). Organize and prepare deposition transcripts (.5). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison, Lattin, client regarding preparation for trial (1.3).	
1368.001	05/11/2019	JS	A	9	110.00	2.30	253.00	ARCH
							Review, revise and update trial exhibit list (.8). Prepare exhibit copies for trial (1.5).	
1368.001	05/12/2019	KRR	A	9	400.00	1.80	720.00	ARCH
							(60%) Study, evaluate, and outline trial statements submitted by parties (.6). Prepare opening	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	05/13/2019	KRR	A	9	400.00	4.98	1,992.00	statement regarding pending equitable claims filed against Todd (1.3). Telephone conference with Todd regarding charts utilized during jury trial to be marked as exhibits for claims and equity (.8). Work with Mark Ivey to utilize IT for demonstration of exhibits to court (.3).
1368.001	05/13/2019	JS	A	9	110.00	4.50	495.00	(60%) Prepare for trial (1.8). Appear at trial, made presentations and confer with co-counsel for stipulated process (3.4). Meeting with Don and Todd to orchestrate strategies for briefs on evidence and briefs on issues raised by Judge Hardy (3.1). Prepare for and attend trial (2.5). Attend conference with Kent Robison, Lattin, client regarding strategy and plan (.8). Begin assembly and analysis of document/information for brief per Kent Robison (1.2).
1368.001	05/14/2019	JS	A	9	110.00	3.10	341.00	Conference with Kent Robison to review case status and my assignments (.3). Review trial transcripts for testimony for trial briefs (2.5). Locate, prepare and send documents/information for Lattin (.3).
1368.001	05/14/2019	KRR	A	9	400.00	0.60	240.00	(50%) Started drafting stipulation regarding admission of evidence. Receive redline version back from Spencer. Rejected redline version. Work on Todd's objections to admission of documents and exhibits newly identified and marked by Spencer.
1368.001	05/15/2019	JS	A	9	110.00	2.00	220.00	Conference with Kent Robison to review status of my assignments (.2). Continue with review of trial transcripts and exhibits for trial brief (1.8).
1368.001	05/15/2019	KRR	A	9	400.00	1.44	576.00	(60%) Draft opposition to Wendy's offer of exhibits (.8). Work up outline for brief with Hannah (1.2). Telephone conference with Todd and Don regarding potential ongoing settlement discussions precluding need to brief (4).
1368.001	05/16/2019	KRR	A	9	400.00	1.38	552.00	(60%) Work on stipulation (.3). Work on evidence objections (.7). Office conference Todd regarding meeting with Wendy (1.3)
1368.001	05/16/2019	JS	A	9	110.00	1.00	110.00	Conference with Kent Robison to review status of my assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Attend status/strategy conference with Kent Robison and client (.5).
1368.001	05/17/2019	KRR	A	9	400.00	1.28	512.00	(80%) Receive and review a series of texts exchanged between Wendy and Todd (4). Office conference with Todd regarding texts and Wendy's new strategy to use Todd against Stan (9). Review Don's Motion to Strike - Joinder (3).
1368.001	05/20/2019	TMS	A	9	250.00	3.00	750.00	Review order and underlying briefing (1); review transcript of trial (1); meeting with client (1)
1368.001	05/20/2019	JS	A	9	110.00	1.90	209.00	Conference with Kent Robison to review case status and strategy (.2). Locate and prepare documents/information for Kent Robison (2). Attend strategy conference with Kent Robison, Lattin and client (1.0). Print and organize tests from Wendy (5).
1368.001	05/24/2019	KRR	A	9	400.00	1.28	512.00	(80%) Work on closing brief regarding analysis of all documents creating Incline TSS, the option, the option payments, Hascheff testimony regarding need to exercise and exercise of option.
1368.001	05/28/2019	JS	A	9	110.00	2.00	220.00	Conference with Kent Robison to review status of my assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Review and research trial transcripts to confirm official copies (1.5).
1368.001	05/29/2019	JS	A	9	110.00	3.00	330.00	Conference with Kent Robison to review case status

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 1368.001 Jaksick/Todd									
								and my assignments (.2). Prepare for and attend conference with Kent Robison, Therese Shanks and client to work on trial brief (1.8). Locate and prepare documents/information for Kent Robison (1.0).	
1368.001	05/29/2019	TMS	A	9	250.00	0.25	62.50	Meeting with client	ARCH
1368.001	05/29/2019	KRR	A	9	400.00	2.38	952.00	(70%) Office conference with Todd and Jessica to write introduction overview and first portion of "fact" sections for Todd's brief. Review language in Trust Agreements to emphasize scope and nature of Todd's powers.	ARCH
1368.001	05/30/2019	KRR	A	9	400.00	1.08	432.00	(60%) Continue to draft fact section of Todd's brief on Wendy's equitable claims.	ARCH
1368.001	06/04/2019	KRR	A	9	400.00	1.76	704.00	(80%) Continue work on closing brief by drafting facts relevant to December documents with factual explanation for complications and shortcomings. Correspondence with Bob Enzenberger regarding likelihood or unlikelihood of mediation going forward. Receive, review correspondence from Wendy and Mark Connot.	ARCH
1368.001	06/05/2019	KRR	A	9	400.00	1.76	704.00	(80%) Continue to review exhibits and testimony to prepare that portion of brief dedicated to 2012 documentation.	ARCH
1368.001	06/10/2019	JS	A	9	110.00	1.00	110.00	Attend strategy conferene with Kent Robison and Therese Shanks regarding our closing argument brief (.5). Begin preparation of exhibits for same (.5).	ARCH
1368.001	06/10/2019	TMS	A	9	250.00	3.90	975.00	Begin editing facts/overview of brief (3); meet with KRR re new structure (1); outline draft argument portion of brief (2); begin draft brief re unjust enrichment and constructive trust (1); research re notary publics (0.8)	ARCH
1368.001	06/10/2019	KRR	A	9	400.00	0.84	336.00	(60%) Continue draft of "facts" and introduction on Todd's initial closing brief.	ARCH
1368.001	06/11/2019	JS	A	9	110.00	1.10	121.00	Locate and prepare documents/information/exhibits for closing argument brief (.8). Check on trial transcript status (.3).	ARCH
1368.001	06/12/2019	TMS	A	9	250.00	3.00	750.00	Draft closing argument portion re enforceability of ACPAs (2.6); draft closing argument portion re enforceability of Tahoe, Indemnification and No Contest (3.4)	ARCH
1368.001	06/13/2019	KRR	A	9	400.00	0.78	312.00	(60%) Exhibits, testimony continued in fact section.	ARCH
1368.001	06/13/2019	JS	A	9	110.00	1.20	132.00	Telephone conferences with Kent Robison to review status of my assignments (.2). Continue with locating and preparing documents/information/exhibits for brief (1.0).	ARCH
1368.001	06/13/2019	TMS	A	9	250.00	1.50	375.00	Edit closing argument brief	ARCH
1368.001	06/14/2019	JS	A	9	110.00	1.00	110.00	Telephone conference with Kent Robison to review closing brief (.2). Continue with location and assembly of exhibits (.8).	ARCH
1368.001	06/17/2019	KRR	A	9	400.00	0.72	288.00	(60%) Continue working on trial brief. Research third restatement of trusts to determine whether there exists correct succinct language concerning court's duty to honor Sam's testamentary.	ARCH
1368.001	06/17/2019	KRR	A	9	400.00	0.21	84.00	(70%) Exchange emails regarding whether closing briefs are due on June 19th or whether a stay or extension exists.	ARCH
1368.001	06/18/2019	JS	A	9	110.00	6.20	682.00	Locate, prepare and send documents/information to Lattin (.2). Conference with Kent Robison to assist with document/information/exhibits for closing brief (3.0). Locate and prepare additional documents/information/exhibits for brief (1.5). Attend conference with Kent Robison and client (1.0). Locate and request trial transcript (.5).	ARCH
1368.001	06/18/2019	KRR	A	9	400.00	4.76	1,904.00	(70%) Continue work on rough draft of Todd's initial closing brief (5.1). Email traffic regarding extension	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	06/19/2019	JS	A	9	110.00	3.00	330.00	ARCH
							of time to file closing brief (.3). Conference with Don Lattin regarding position on Wendy's demand for 10 day extension (.6). Receive emergency motion (.2). Provide emergency response (.6). Assit with documents/information/exhibits for closing brief (2.5). Locate and prepare additional documents/information/exhibit for Kent Robison (.5).	
1368.001	06/19/2019	TMS	A	9	250.00	2.00	500.00	ARCH
1368.001	06/19/2019	KRR	A	9	400.00	4.55	1,820.00	ARCH
							Edit trial statement (70%) Work with Therese, Jess, Todd, and Don to complete in final form and file Todd's initial closing brief (6.2). File additional opposition/response to Zach Johnson's emergency motion to extend deadline to file brief on opening arguments regarding equitable claims (.3).	
1368.001	06/20/2019	JS	A	9	110.00	0.50	55.00	ARCH
							Conference with Kent Robison to review case status (.2). Locate and prepare documents/information for Kent Robison (.3).	
1368.001	06/24/2019	JS	A	9	110.00	1.20	132.00	ARCH
							Continue with review of closing brief to confirm trial exhibit numbers and content (1.2).	
1368.001	06/25/2019	KRR	A	9	400.00	0.96	384.00	ARCH
							(60%) Work on incorporating Jessica's suggested changes and corrections into closing brief (.8). "Added sites re: Trustees' powers to brief" (.4). Revise citations to no context cases and added language regarding Sam's intent (.4).	
1368.001	06/25/2019	TMS	A	9	250.00	1.00	250.00	ARCH
1368.001	06/26/2019	KRR	A	9	400.00	2.17	868.00	ARCH
							Research re settlor's intent (1); edit closing brief (1) (70%) Continue draft of overview, facts, and arguments on ACPA's for Todd's initial closing brief.	
1368.001	06/27/2019	KRR	A	9	400.00	1.60	640.00	ARCH
							(80%) Work on draft of brief. Review Pierre Hascheff testimony regarding indemnification agreement signature pages and margins. Compare Pierre Hascheff's testimony to opinions and report of James Green to provide clarification in brief.	
1368.001	06/27/2019	JS	A	9	110.00	0.30	33.00	ARCH
							Locate and prepare documents/information for Kent Robison for brief.	
1368.001	06/28/2019	JS	A	9	110.00	0.30	33.00	ARCH
							Locate and prepare documents/information for Kent Robison.	
1368.001	07/01/2019	KRR	A	9	400.00	2.66	1,064.00	ARCH
							(70%) Work on revisions Todd and Jessica recommended to final brief. Various telephone conference with Jayne and Todd to decide which recommendations, comments, and changes should be incorporated in final brief. Finalize brief and submit for filing. Receive and review Stanley's initial closing brief. Receive Wendy's initial closing brief and "started" review and discussions with Therese.	
1368.001	07/01/2019	JS	A	9	110.00	0.50	55.00	ARCH
							Locate and prepare documents/information for Kent Robison.	
1368.001	07/02/2019	KRR	A	9	400.00	1.33	532.00	ARCH
							(70%) Start review and analysis of Wendy's 107 page brief. Order transcripts. Read Don's and Adam's brief to find inconsistencies and or contradictions.	
1368.001	07/02/2019	JS	A	9	110.00	1.00	110.00	ARCH
							Conference with Kent Robison to review my assignments (.2). Request certified trial transcripts (.2). Review Wendy and Stan closing briefs (.6).	
1368.001	07/09/2019	KRR	A	9	400.00	1.92	768.00	ARCH
							(80%) Office conference with Don and Todd to review Wendy's brief and issues raised therein, together with various issues pertaining to Todd not being involved in a managerial position on various LLCs and Wendy's sub-trust.	
1368.001	07/09/2019	JS	A	9	110.00	0.60	66.00	ARCH
							Locate and prepare documents/information for Kent Robison (.3). Follow-up with Sunshine regarding trial transcripts (.3).	
1368.001	07/09/2019	TMS	A	9	250.00	1.50	375.00	ARCH
							Read Wendy's closing brief (1); read stan's closing brief (0.5)	
1368.001	07/10/2019	KRR	A	9	400.00	1.28	512.00	ARCH
							(80%) Work on brief. Telephone conference with	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
							Don Lattin regarding allocation of responsibilities on brief and which office is briefing which issues.	
1368.001	07/10/2019	JS	A	9	110.00	0.20	22.00	Follow-up and re-request trial transcripts. ARCH
1368.001	07/12/2019	JS	A	9	110.00	0.20	22.00	Follow-up wit Sunshine regarding trial transcripts. ARCH
1368.001	07/15/2019	JS	A	9	110.00	0.50	55.00	Conference with Kent Robison to review my assignments (.2). Index final trial transcripts to order missing days (.3). ARCH
1368.001	07/16/2019	JS	A	9	110.00	0.20	22.00	Follow-up on status of final trial transcript availability. ARCH
1368.001	07/17/2019	KRR	A	9	400.00	3.68	1,472.00	(80%) Prepare for meeting with Todd Jaksick by preparing outline of Wendy's brief (2.1). Met with Todd and Therese to start developing strategy for final brief (2.1). Prepare extensive email to Don and attempt to allocate which law firm is working on which specific issues raised in Wendy's brief (.4). ARCH
1368.001	07/17/2019	JS	A	9	110.00	3.80	418.00	Conference with Kent Robison to review status of my assignments (.3). Prepare for and attend strategy conference with Kent Robison, Therese Shanks and client (1.2). Begin location and assembly of all authority cited and exhibits listed by Wendy's counsel in brief (2.3). ARCH
1368.001	07/17/2019	TMS	A	9	250.00	5.50	1,375.00	Meeting with client (1.5); begin work on outlining and researching issues re Tahoe House and SSJ trust for closing brief (4) ARCH
1368.001	07/18/2019	KRR	A	9	400.00	1.44	576.00	(80%) Continue to write rough draft of introduction and pertinent facts for Todd's final brief as individual. ARCH
1368.001	07/18/2019	JS	A	9	110.00	3.00	330.00	Continue with review of all trial exhibits and authority cited by Wendy and assemble same per sections of Wendy's closing brief. ARCH
1368.001	07/19/2019	JS	A	9	110.00	2.80	308.00	Locate and prepare copies of all exhibits for Wendy's brief in section order for response. ARCH
1368.001	07/22/2019	JS	A	9	110.00	2.30	253.00	Continue with organization of trial exhibits per each section of Wendy's brief (1.8). Follow up and copy final trial testimony from Sunshine (.5). ARCH
1368.001	07/22/2019	TMS	A	9	250.00	2.00	500.00	draft argument portion re ACPA ARCH
1368.001	07/22/2019	KRR	A	9	400.00	0.96	384.00	(80%) Work on coordinating specific exhibits to aspects of introduction and overview with regarding to Wendy's false accusations and reliance on evidence not presented at trial. ARCH
1368.001	07/23/2019	KRR	A	9	400.00	2.10	840.00	Brief. ARCH
1368.001	07/23/2019	JS	A	9	110.00	0.70	77.00	Conference with Kent Robison to review my assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Follow up on trial transcripts (.2). ARCH
1368.001	07/23/2019	TMS	A	9	250.00	7.00	1,750.00	Draft argument portion re Tahoe House (6); research re basis to set aside option agreements (1) ARCH
1368.001	07/24/2019	TMS	A	9	250.00	2.00	500.00	begin edits to brief ARCH
1368.001	07/25/2019	JS	A	9	110.00	0.50	55.00	Organize and prepare sub folder of final trial testimony transcripts. ARCH
1368.001	07/25/2019	KRR	A	9	400.00	1.68	672.00	(80%) Continue drafting of final brief. Review testimony of Bob Legoy, powers provisions of trusts, and reread and evaluate James Green's report. ARCH
1368.001	07/29/2019	KRR	A	9	400.00	2.72	1,088.00	(80%) Office conference with Todd to review draft of final brief (1.2). Draft additional portions of final brief regarding Legoy testimony, 7th amendment, and Lake Tahoe values increasing (2.2). ARCH
1368.001	07/29/2019	JS	A	9	110.00	3.80	418.00	Conference with Kent Robison to review status of my assignments (.2). Prepare for and attend conference with Kent Robison, Therese Shanks, client to review Closing Brief (.8). Locate and prepare documents/information/exhibit for Brief (2.0). Locate and prepare documents/information for Kent Robison (.8). ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 1368.001 Jaksick/Todd									
1368.001	07/29/2019	TMS	A	9	250.00	2.10	525.00	Meeting with client; incorporate changes to brief.	ARCH
1368.001	07/30/2019	JS	A	9	110.00	2.30	253.00	Continue with location and preparation of documents/information/testimony/exhibits for Closing Brief.	ARCH
1368.001	07/30/2019	TMS	A	9	250.00	1.00	250.00	Edit closing brief.	ARCH
1368.001	07/30/2019	KRR	A	9	400.00	0.96	384.00	(80%) Finalize Jaksick brief.	ARCH
1368.001	07/31/2019	JS	A	9	110.00	1.50	165.00	Continue with review and analysis of preparation of trial testimony for Closing Brief exhibits.	ARCH
1368.001	07/31/2019	KRR	A	9	400.00	3.36	1,344.00	(80%) Work on final revisions and edits to Todd's closing brief. Assemble necessary exhibits with Jim. Prepare index.	ARCH
1368.001	08/02/2019	KRR	A	9	400.00	1.52	608.00	(80%) Receive Stan Jaksick's closing brief. Review same. Outline and evaluate, forward comments to Don Lattin concerning Stan's apparent acquisition in various issues except the urgency of consummating the settlement agreement.	ARCH
1368.001	08/08/2019	KRR	A	9	400.00	0.80	320.00	(80%) Office meeting for strategy session. Prepare letter to Don.	ARCH
1368.001	08/16/2019	KRR	A	9	400.00	1.44	576.00	(80%) Prepare for meeting with Todd by reviewing latest emails and partial read of Wendy's final brief and partial read of Stan's final brief. Office conference with Stan with Don on line to review latest developments in light of August 8th list of topics to discuss and resolve.	ARCH
1368.001	08/28/2019	KRR	A	9	400.00	1.20	480.00	Telephone conference with Todd and Don regarding settlement issues that surround and involve the Lake Tahoe house (.4). Review file to renew and prepare for filing petition to have Stan pay 325 to family trust and consider partition of Toiyabe with regarding lots it owns half owned by family trust (.8).	ARCH
1368.001	08/29/2019	KRR	A	9	400.00	0.96	384.00	(80%) Receive, review August 29th settlement agreement concerning Stan's and Todd's agreement fees. Work on analysis of fee issues presented there relative to RSSB's bills and draft letter to client regarding clarification of deal made with Stan as not binding on firm.	ARCH
1368.001	09/05/2019	KRR	A	9	400.00	0.96	384.00	(80%) Conference with Don and Todd to decide, contemplate, analyze, and evaluate options for Todd regarding settlement agreement and events and circumstances between now and Judge Hardy's decision.	ARCH
1368.001	11/06/2019	KRR	A	9	400.00	2.60	1,040.00	Office conference with Don and Todd regarding Family Trust issues. Work on notice of Trustee's meeting with specific topics. Work on review Secretary of State to determine which entities Todd is managing or charged with managing.	ARCH
1368.001	12/11/2019	KRR	A	9	400.00	0.65	260.00	(50%) Office conference regarding status and fee arrangement.	ARCH
1368.001	12/27/2019	KRR	A	9	400.00	0.55	220.00	(50%) Prepare letter on behalf of Todd demanding that trust pay Todd's share of Jack Rabbit capital call. Review prior letter. Receive Todd's suggested changes. Incorporate suggested changes.	ARCH
1368.001	01/28/2020	JS	A	9	110.00	0.20	22.00	Prepare list of official trial transcripts.	ARCH
1368.001	02/07/2020	TMS	A	9	250.00	0.50	125.00	Review order regarding supplemental briefing.	ARCH
1368.001	02/10/2020	KRR	A	9	400.00	1.10	440.00	(50%) Office conference to strategize on response to court's order. Began reviewing particular exhibits and transcripts to support brief. Review Todd's February 22nd testimony and closing arguments concerning exhibit 561. Review Don's brief in response to motion to compel distribution. Review our brief on equitable claims that address and cover trial exhibit 561.	ARCH
1368.001	02/10/2020	CMO	A	9	250.00	0.50	125.00	Meeting with KRR about research re the trust (.5)	ARCH
1368.001	02/11/2020	KRR	A	9	400.00	0.55	220.00	(50%) Work on supplemental brief incorporating	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
							real image of 561. Assemble exhibits included Todd's testimony transcript, Kent's closing argument transcript, exhibit 561, brief by Don, brief by Kent. Receive and review exhibit 90 and incorporate explanation in discussion in supplemental brief.	
1368.001	02/11/2020	CMO	A	9	250.00	2.00	500.00	ARCH
1368.001	02/12/2020	KRR	A	9	400.00	1.00	400.00	ARCH
1368.001	02/12/2020	KRR	A	9	400.00	0.45	180.00	ARCH
1368.001	02/12/2020	CMO	A	9	250.00	6.40	1,600.00	ARCH
1368.001	02/13/2020	KRR	A	9	400.00	0.90	360.00	ARCH
1368.001	02/13/2020	CMO	A	9	250.00	2.10	525.00	ARCH
1368.001	02/14/2020	KRR	A	9	400.00	0.40	160.00	ARCH
1368.001	02/14/2020	HEW	A	9	250.00	0.25	62.50	ARCH
1368.001	02/18/2020	KRR	A	9	400.00	0.65	260.00	ARCH
1368.001	02/19/2020	KRR	A	9	400.00	0.45	180.00	ARCH
1368.001	02/19/2020	TMS	A	9	250.00	0.25	62.50	ARCH
1368.001	02/20/2020	KRR	A	9	400.00	0.60	240.00	ARCH
1368.001	02/20/2020	TMS	A	9	250.00	0.25	62.50	ARCH
1368.001	02/25/2020	KRR	A	9	400.00	0.30	120.00	ARCH
1368.001	02/26/2020	KRR	A	9	400.00	0.40	160.00	ARCH
1368.001	02/28/2020	KRR	A	9	400.00	1.20	480.00	ARCH
1368.001	03/03/2020	KRR	A	9	400.00	0.30	120.00	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.001 Jaksick/Todd								
1368.001	03/04/2020	KRR	A	9	400.00	0.90	360.00 text from Wendy concerning accusation that Stan mismanages Toiyabe. (50%) Work on and complete analysis of Todd's exposure as Officer, Director and or Manager of various family entities in which Family Trust/Issue Trust hold interest. Review hate mail from Wendy and Luke. Telephone conference with Todd. Work on response to Wendy's email containing false information.	ARCH
1368.001	03/05/2020	KRR	A	9	400.00	0.80	320.00 Read and review Luke's and Wendy's emails regarding Todd's performance as Trustee of Issue Trust. Telephone conference with Todd. Work on draft of an email for Todd to use to respond to Wendy/Luke.	ARCH
1368.001	03/09/2020	KRR	A	9	400.00	0.75	300.00 (50%) Work on responding to Luke's and Wendy's emails concerning criticism of Todd and threats to sue (.8). Telephone conference with Don regarding my draft in response to Luke (.4). Work on letter to Kevin Riley intended to add additional protection for Todd's position as Treasurer of Toiyabe Investment Company (.3).	ARCH
1368.001	03/12/2020	KRR	A	9	400.00	1.90	760.00 Review order. Telephone conference with Don and Todd. Started work on judgment.	ARCH
1368.001	03/17/2020	KRR	A	9	400.00	0.85	340.00 (50%) Continue to review decision. Set system up for dictating and preparing judgment. Telephone conference with Mike Kimmel, Don Lattin, and Todd Jaksick.	ARCH
1368.001	03/18/2020	KRR	A	9	400.00	1.55	620.00 (50%) Office conference with Don. Work on pending issues. Draft Judgment. Research motions to amend judgment and 54(b) certifications.	ARCH
1368.001	03/18/2020	TMS	A	9	250.00	0.65	162.50 Review order and identify issue's for Rule 59 motions (1). Call regarding same (0.3).	ARCH
1368.001	03/24/2020	TMS	A	9	250.00	0.50	125.00 Review memorandum of costs and bases to object.	ARCH
1368.001	03/24/2020	KRR	A	9	400.00	0.60	240.00 (50%) Motion to strike memorandum of costs. Work on judgment. Email traffic with Adam.	ARCH
1368.001	03/25/2020	KRR	A	9	400.00	1.10	440.00 (50%) Telephone conference Adam regarding changes to proposed judgment. Revise proposed judgment. Draft letter to Court. Continue work on "prevailing party" issue.	ARCH
1368.001	03/25/2020	JS	A	9	110.00	0.50	55.00 Reivew trial transcripts to confirm certified copies and prepare chart of same.	ARCH
1368.001	03/25/2020	TMS	A	9	250.00	0.50	125.00 Research regarding prevailing party (0.5). Review memos of costs and judge's order (0.5).	ARCH
1368.001	03/26/2020	JS	P	9	110.00	0.30	33.00 Locate and prepare documents/information for Kent Robison.	886
1368.001	03/26/2020	KRR	P	9	400.00	1.20	480.00 (50%) Finalize proposed judgment in light of Adam's comments and Don's comments. Telephone conference with Shannon Parke regarding submission of proposed judgment to Judge Hardy. Revise accordingly. Submit proposed judgment to Judge Hardy for review and analysis. Continue to review prospects for indemnification claim against Stanley based on Hardy's findings that Todd paid because of untimely and incomplete accountings.	891
1368.001	03/30/2020	KRR	P	9	400.00	3.10	1,240.00 (50%) Motion to Amend Judgment.	884
1368.001	03/30/2020	JS	P	9	110.00	0.20	22.00 Confirm and copy trial transcripts for certified copies.	887
1368.001	03/31/2020	JS	P	9	110.00	2.00	220.00 Conference with Kent Robison to review my assignment (.2). Research/review trial exhibits for information for Kent Robison (1.8).	888
1368.001	04/01/2020	JS	P	9	110.00	1.50	165.00 Conference with Kent Robison to review my assignments (.2). Review all documents and trial exhibits for documents/information/exhibits for Kent Robison (1.3).	889

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

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 1368.001 Jaksick/Todd								
1368.001	04/01/2020	JS	P	9	110.00	1.80	198.00	890
								Conference with Kent Robison to review my assignments (.2). Review, locate and send cases and information to Kent Robison (.8). Review documents/information/exhibits for Kent Robison (.8).
Total for Client ID 1368.001					Billable	282.65	75,339.50	Jaksick/Todd
					Non-billable	0.50	55.00	(445) SSJs Trust
					Total	283.15	75,394.50	
GRAND TOTALS								
					Billable	282.65	75,339.50	
					Non-billable	0.50	55.00	
					Total	283.15	75,394.50	
							-10,417.00	JS - Paralegal
							<u>\$64,977.50</u>	

FILED
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2020-04-10 02:52:40 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

EXHIBIT 5

EXHIBIT 5

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	03/18/2019	KRR	A	9	400.00	1.10	440.00 (50%) Receive, review Zach Johnson's May 15th letters and start draft of response to both (.4). Office conference with Don Lattin and Todd Jaksick concerning post verdict matters and developments (1.8).	ARCH
1368.002	03/18/2019	JS	A	9	110.00	0.80	88.00 Review and update trial exhibit binders for missing/incomplete exhibits (.8).	ARCH
1368.002	03/19/2019	JS	A	9	110.00	0.50	55.00 Continue with updating trial exhibits binders.	ARCH
1368.002	03/20/2019	JS	A	9	110.00	0.80	88.00 Continue with review and updating of trial exhibit binders (.8).	ARCH
1368.002	03/21/2019	TMS	A	9	250.00	1.50	375.00 Review opposition to memorandum of costs (0.5); research re same (0.5); analysis re best next steps (0.5)	ARCH
1368.002	03/21/2019	KRR	A	9	400.00	1.76	704.00 (40%) Work on withdraw of memorandum of costs (.7). Receive response from Wendy's counsel concerning Todd's request for judgment on jury verdict (.7). Start preparation of reply thereto (.8). Response to letter suggesting that Todd resign (.7). Redraft, revise and finalize and sent to all counsel (.7). Search 54(b) certification finality issues with regard to bifurcation of equitable claims versus legal claims (.8).	ARCH
1368.002	03/22/2019	TMS	A	9	250.00	2.50	625.00 Review and analyze opposition to motion for judgment (0.5); Draft notice of withdrawal of memo of costs and emails re same (0.2); draft reply ISO mtn for entry of judgment (1.5); edit (0.3)	ARCH
1368.002	03/22/2019	JS	A	9	110.00	1.00	110.00 Continue with review and updating of trial exhibit binders (working and clean).	ARCH
1368.002	03/25/2019	JS	A	9	110.00	0.50	55.00 Continue with updating and completing trial exhibit binders.	ARCH
1368.002	03/25/2019	KRR	A	9	400.00	1.84	736.00 (40%) Work on Todd's opposition with Therese to Wendy's motion to retax costs and her opposition to memorandum of costs (1.8). Work on Jen & research concerning availability of motions for summary judgment concerning res judicata/claim preclusion/issue preclusion for indemnification claims and all claims pertinent to "unjust enrichment" otherwise categorized as a claim inequity (2.8)	ARCH
1368.002	03/26/2019	TMS	A	9	250.00	1.00	250.00 Review Wendy opposition to motion for fees, outline areas research (0.5); research re pre-offer and post-offer costs (0.5)	ARCH
1368.002	03/26/2019	KRR	A	9	400.00	0.72	288.00 (40%) Finalize, proof read of Todd Jaksick's reply to Wendy's opposition for motion for entry of judgment on jury verdict. Read and review GSR Points and Authorities to incorporate best cases in reply.	ARCH
1368.002	03/27/2019	TMS	A	9	250.00	2.50	625.00 Research re whether fees and pre-offer costs are considered in determining whether judgment obtained was better (1); outline reply (0.5); begin draft reply (1)	ARCH
1368.002	03/27/2019	JS	A	9	110.00	1.00	110.00 Continue with review of all trial exhibit binders to update and complete binders.	ARCH
1368.002	03/28/2019	TMS	A	9	250.00	2.00	500.00 Finish draft reply (1); edit (0.5); further research re offer of judgment comparison and pre-offer interest, fees and costs (0.5)	ARCH
1368.002	03/28/2019	JS	A	9	110.00	0.50	55.00 Update/revise trial exhibit binders.	ARCH
1368.002	04/01/2019	KRR	A	9	400.00	0.96	384.00 (40%) Continue work on reply to Wendy's opposition to motions for attorney's fees. Dictate affidavit concerning credentials and qualifications. Work on distinguishing De's interpretation of "court prevailing party".	ARCH
1368.002	04/09/2019	KRR	A	9	400.00	1.60	640.00 (40%) Review all pending motions in preparation for meeting with client, including memorandum of	ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
							costs, motion for fees, motion for entry of judgment on jury verdict (.6). Office conference with Don Lattin and Todd Jaksick to review status of preparation for claims and equity (2.2). Start work on NRCP 16 request for status conference (.4). Work on preliminary research regarding availability of summary judgment motion based on res judicata for unjust enrichment claim (.8).	
1368.002	04/16/2019	KRR	A	9	400.00	1.10	440.00	(50%) Prepare for office conference with Jessica and Todd by reviewing court's orders for May trial. Draft motion for pre-trial status conference. Office conference with Jessica and Todd. ARCH
1368.002	04/17/2019	TMS	A	9	250.00	0.70	175.00	edit MIL re inconsistent verdicts ARCH
1368.002	04/17/2019	KRR	A	9	400.00	0.88	352.00	(40%) Prepare motion for rule 16 pre-trial status conference (.9). Sent to Don and incorporated changes suggested (.5). Draft first iteration of Motion in Limine/MSJ regarding unjust enrichment (.8). ARCH
1368.002	04/30/2019	KRR	A	9	400.00	1.20	480.00	(40%) Start work on trial statement (.9). Research Nevada law on constructive trust and unjust enrichment (1.1). Receive and start analysis of Wendy's opposition to motion in limine/MSJ (.8). Process request for submission on motion for status conference (.2). ARCH
1368.002	05/01/2019	KRR	A	9	400.00	1.28	512.00	(40%) Receive and thoroughly review Wendy's opposition to Todd's motion in limine/MSJ; start rough draft of reply; analyze cases cited by Wendy in her opposition (.9). Did additional research on Nevada cases concerning constructive trust and unjust enrichment blended with contract (.5). Inter-office conference with Therese regarding trial statement and reply (.4). Work with Jim on retrieving exhibit books and exhibit list to determine which exhibits, if any, Todd will use at equity trial (.8). Review pleadings both by Todd and Wendy to determine whether declaratory relief action exists for indemnification agreement interpretation and enforceability thereof (.6). ARCH
1368.002	05/01/2019	JS	A	9	110.00	1.00	110.00	Attend conference with Kent Robison and Therese Shanks to review status and strategy for trial (.5). Locate and prepare documents/information for Kent Robison (.5). ARCH
1368.002	05/01/2019	TMS	A	9	250.00	1.00	250.00	Review opposition to MIL (0.5); meeting re next steps for upcoming trial (0.5) ARCH
1368.002	05/02/2019	JS	A	9	110.00	2.10	231.00	Prepare for and attend conferences with Kent Robison, Therese Shanks, Lattin to review status and trial strategy (.8). Attend phone status hearing (.5). Locate and prepare documents/information for Kent Robison (.8). ARCH
1368.002	05/02/2019	TMS	A	9	250.00	2.00	500.00	Meeting with co-counsel (0.5); court call (0.5); meeting with client (0.5); begin research re trial statement (0.5) ARCH
1368.002	05/02/2019	KRR	A	9	400.00	1.08	432.00	(40%) Meeting with Don Lattin and Todd Jaksick to prepare for telephone conference with Judge Hardy (.7). Pre-trial status conference with Judge Hardy regarding trial on equitable claims (.8). Strategy conference with Todd and Don Lattin for trial strategy evidence and witness identification (1.2). ARCH
1368.002	05/03/2019	JS	A	9	110.00	1.80	198.00	Telephone conference with Kent Robison to review my assignments (.3). Review and revise 500 trial exhibits for completeness (1.0). Locate, prepare and send documents/information to Kent Robison (.3). Contact Mark Ivey regarding A.V. for trial (.2). ARCH
1368.002	05/03/2019	TMS	A	9	250.00	4.00	1,000.00	Research re trusts as contracts (0.25); research re ARCH

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	05/06/2019	KRR	A	9	400.00	0.54	216.00	ARCH
							seventh amendment right to jury (0.25); draft reply (1.5); edit (0.5); research re constructive trust and unjust enrichment issues (0.5); draft new trial statement (1)	
1368.002	05/06/2019	JS	A	9	110.00	3.80	418.00	ARCH
							(30%) Work on trial statement (1.1). Review exhibit list to determine which exhibits will be relied on and correspondence with Linda Shaw concerning transcripts (.7).	
1368.002	05/06/2019	TMS	A	9	250.00	1.50	375.00	ARCH
							Conference with Kent Robison to review my assignments and case status (.3). Locate and prepare documents/information for Kent Robison (.5). Review trial exhibits for new exhibits and marked exhibits (1.5). Begin lists of exhibits marked and admitted (1.5).	
1368.002	05/07/2019	JS	A	9	110.00	4.10	451.00	ARCH
							Research re failure to supplement prior to eve of trial and inclusion in trial statement (1); review with KRR re upcoming trial (0.5)	
1368.002	05/07/2019	TMS	A	9	250.00	1.00	250.00	ARCH
1368.002	05/07/2019	KRR	A	9	400.00	1.65	660.00	ARCH
							Multiple conferences with Kent Robison to review my assignments and exhibits for trial statement (1.0). Work on lists of admitted excluded exhibits (1.0). Prepare for and attend conference with Kent Robison, Lattin, client (1.3). Locate and prepare document/information for Kent Robison (.5). Three telephone conferences with court clerk (.3). edit trial statement (0.25); client meeting (0.75)	
							(30%) Emails regarding retention of Mark Ivey for equity trial (.5). Telephone conference with Todd (.25). Telephone conference with Don (.25). Arrange for meeting (.1). Office conference with Todd and Don to coordinate preparation of trial statement in response to Judge Hardy's directives (2.2). Start draft of trial statement (facts/introduction/overview) in conjunction with Therese's work on legal issues (2.2).	
1368.002	05/08/2019	JS	A	9	110.00	3.80	418.00	ARCH
							Multiple conferences with Kent Robison to review case status and my assignments (.8). Review and update exhibit binders (working and clean) (1.5). Review and revise exhibit index for court (1.5).	
1368.002	05/08/2019	KRR	A	9	400.00	0.60	240.00	ARCH
							(50%) Trial preparation by reviewing various portions of Wendy's testimony and review of pertinent exhibits to be presented, finished, worked on and prepare rough draft of Todd's trial statement.	
1368.002	05/09/2019	JS	A	9	110.00	2.70	297.00	ARCH
							Continue with review and updating of all exhibit binders (.8). Continue with review and revision of court trial exhibit index (1.0). Review Lattin trial statement (.2). Locate and prepare new exhibit (.5). Two telephone conferences with Mark Ivey (.2).	
1368.002	05/09/2019	KRR	A	9	400.00	0.24	96.00	ARCH
							(20%) Complete Trial Statement regarding Claims in Equity. Work on list of witnesses and additional exhibits to be admitted showing as stipulated.	
1368.002	05/10/2019	JS	A	9	110.00	4.30	473.00	ARCH
							Review Wendy trial statement and assemble exhibits (1.0). Review, revise and update or exhibit binders (1.0). Organize and prepare deposition transcripts (.5). Locate and prepare documents/information for Kent Robison (.5). Attend conference with Kent Robison, Lattin, client regarding preparation for trial (1.3).	
1368.002	05/11/2019	JS	A	9	110.00	2.30	253.00	ARCH
							Review, revise and update trial exhibit list (.8). Prepare exhibit copies for trial (1.5).	
1368.002	05/12/2019	KRR	A	9	400.00	1.20	480.00	ARCH
							(40%) Study, evaluate, and outline trial statements submitted by parties (.6). Prepare opening statement regarding pending equitable claims filed against Todd (1.3). Telephone conference with Todd	

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Hours to Bill	Amount	Ref #
Client ID 1368.002 Jaksick/Todd								
1368.002	05/13/2019	KRR	A	9	400.00	3.32	1,328.00	ARCH
							regarding charts utilized during jury trial to be marked as exhibits for claims and equity (.8). Work with Mark Ivey to utilize IT for demonstration of exhibits to court (.3).	
1368.002	05/13/2019	JS	A	9	110.00	4.50	495.00	ARCH
							(40%) Prepare for trial (1.8). Appear at trial, made presentations and confer with co-counsel for stipulated process (3.4). Meeting with Don and Todd to orchestrate strategies for briefs on evidence and briefs on issues raised by Judge Hardy (3.1).	
1368.002	05/14/2019	JS	A	9	110.00	3.10	341.00	ARCH
							Prepare for and attend trial (2.5). Attend conference with Kent Robison, Lattin, client regarding strategy and plan (.8). Begin assembly and analysis of document/information for brief per Kent Robison (1.2).	
1368.002	05/14/2019	KRR	A	9	400.00	0.60	240.00	ARCH
							Conference with Kent Robison to review case status and my assignments (.3). Review trial transcripts for testimony for trial briefs (2.5). Locate, prepare and send documents/information for Lattin (.3).	
1368.002	05/15/2019	JS	A	9	110.00	2.00	220.00	ARCH
							(50%) Started drafting stipulation regarding admission of evidence. Receive redline version back from Spencer. Rejected redline version. Work on Todd's objections to admission of documents and exhibits newly identified and marked by Spencer.	
1368.002	05/15/2019	KRR	A	9	400.00	0.96	384.00	ARCH
							Conference with Kent Robison to review status of my assignments (.2). Continue with review of trial transcripts and exhibits for trial brief (1.8).	
1368.002	05/16/2019	KRR	A	9	400.00	0.92	368.00	ARCH
							(40%) Draft opposition to Wendy's offer of exhibits (.8). Work up outline for brief with Hannah (1.2). Telephone conference with Todd and Don regarding potential ongoing settlement discussions precluding need to brief (.4).	
1368.002	05/16/2019	JS	A	9	110.00	1.00	110.00	ARCH
							(40%) Work on stipulation (.3). Work on evidence objections (.7). Office conference Todd regarding meeting with Wendy (1.3).	
1368.002	05/17/2019	KRR	A	9	400.00	0.32	128.00	ARCH
							Conference with Kent Robison to review status of my assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Attend status/strategy conference with Kent Robison and client (.5).	
1368.002	05/20/2019	JS	A	9	110.00	1.90	209.00	ARCH
							(20%) Receive and review a series of texts exchanged between Wendy and Todd (.4). Office conference with Todd regarding texts and Wendy's new strategy to use Todd against Stan (.9). Review Don's Motion to Strike - Joinder (.3).	
1368.002	05/21/2019	TMS	A	9	250.00	0.40	100.00	ARCH
1368.002	05/24/2019	KRR	A	9	400.00	0.32	128.00	ARCH
							Conference with Kent Robison to review case status and strategy (.2). Locate and prepare documents/information for Kent Robison (.2). Attend strategy conference with Kent Robison, Lattin and client (1.0). Print and organize tests from Wendy (.5).	
1368.002	05/28/2019	JS	A	9	110.00	2.00	220.00	ARCH
							review motion to strike (20%) Work on closing brief regarding analysis of all documents creating Incline TSS, the option, the option payments, Hascheff testimony regarding need to exercise and exercise of option.	
1368.002	05/29/2019	JS	A	9	110.00	3.00	330.00	ARCH
							Conference with Kent Robison to review case status and my assignments (.2). Prepare for and attend conference with Kent Robison, Therese Shanks and client to work on trial brief (1.8). Locate and prepare	

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Client ID 1368.002 Jaksick/Todd								
1368.002	05/29/2019	TMS	A	9	250.00	0.25	62.50	documents/information for Kent Robison (1.0). Meeting with client ARCH
1368.002	05/29/2019	KRR	A	9	400.00	1.02	408.00	(30%) Office conference with Todd and Jessica to write introduction overview and first portion of "fact" sections for Todd's brief. Review language in Trust Agreements to emphasize scope and nature of Todd's powers. ARCH
1368.002	05/30/2019	KRR	A	9	400.00	0.72	288.00	(40%) Continue to draft fact section of Todd's brief on Wendy's equitable claims. ARCH
1368.002	06/04/2019	KRR	A	9	400.00	0.44	176.00	(20%) Continue work on closing brief by drafting facts relevant to December documents with factual explanation for complications and shortcomings. Correspondence with Bob Enzenberger regarding likelihood or unlikelihood of mediation going forward. Receive, review correspondence from Wendy and Mark Connot. ARCH
1368.002	06/05/2019	KRR	A	9	400.00	0.44	176.00	(20%) Continue to review exhibits and testimony to prepare that portion of brief dedicated to 2012 documentation. ARCH
1368.002	06/10/2019	JS	A	9	110.00	1.00	110.00	Attend strategy conferene with Kent Robison and Therese Shanks regarding our closing argument brief (.5). Begin preparation of exhibits for same (.5). ARCH
1368.002	06/10/2019	TMS	A	9	250.00	3.90	975.00	Begin editing facts/overview of brief (3); meet with KRR re new structure (1); outline draft argument portion of brief (2); begin draft brief re unjust enrichment and constructive trust (1); research re notary publics (0.8) ARCH
1368.002	06/10/2019	KRR	A	9	400.00	0.56	224.00	(40%) Continue draft of "facts" and introduction on Todd's initial closing brief. ARCH
1368.002	06/11/2019	JS	A	9	110.00	1.10	121.00	Locate and prepare documents/information/exhibits for closing argument brief (.8). Check on trial transcript status (.3). ARCH
1368.002	06/12/2019	TMS	A	9	250.00	3.00	750.00	Draft closing argument portion re enforceability of ACPAs (2.6); draft closing argument portion re enforceability of Tahoe, Indemnification and No Contest (3.4) ARCH
1368.002	06/13/2019	KRR	A	9	400.00	0.52	208.00	(40%) Exhibits, testimony continued in fact section. ARCH
1368.002	06/13/2019	JS	A	9	110.00	1.20	132.00	Telephone conferences with Kent Robison to review status of my assignments (.2). Continue with locating and preparing documents/information/exhibits for brief (1.0). ARCH
1368.002	06/13/2019	TMS	A	9	250.00	1.50	375.00	Edit closing argument brief ARCH
1368.002	06/14/2019	JS	A	9	110.00	1.00	110.00	Telephone conference with Kent Robison to review closing brief (.2). Continue with location and assembly of exhibits (.8). ARCH
1368.002	06/17/2019	KRR	A	9	400.00	0.48	192.00	(40%) Continue working on trial brief. Research third restatement of trusts to determine whether there exists correct succinct language concerning court's duty to honor Sam's testamentary. ARCH
1368.002	06/17/2019	KRR	A	9	400.00	0.09	36.00	(30%) Exchange emails regarding whether closing briefs are due on June 19th or whether a stay or extension exists. ARCH
1368.002	06/18/2019	JS	A	9	110.00	6.20	682.00	Locate, prepare and send documents/information to Lattin (.2). Conference with Kent Robison to assist with document/information/exhibits for closing brief (3.0). Locate and prepare additional documents/information/exhibits for brief (1.5). Attend conference with Kent Robison and client (1.0). Locate and request trial transcript (.5). ARCH
1368.002	06/18/2019	KRR	A	9	400.00	2.04	816.00	(30%) Continue work on rough draft of Todd's initial closing brief (5.1). Email traffic regarding extension of time to file closing brief (.3). Conference with Don Lattin regarding position on Wendy's demand for 10 day extension (.6). Receive emergency ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	06/19/2019	JS	A	9	110.00	3.00	330.00 motion (.2). Provide emergency response (.6). Assit with documents/information/exhibits for closing brief (2.5). Locate and prepare additional documents/information/exhibit for Kent Robison (.5).	ARCH
1368.002	06/19/2019	TMS	A	9	250.00	2.00	500.00 Edit trial statement	ARCH
1368.002	06/19/2019	KRR	A	9	400.00	1.95	780.00 (30%) Work with Therese, Jess, Todd, and Don to complete in final form and file Todd's initial closing brief (6.2). File additional opposition/response to Zach Johnson's emergency motion to extend deadline to file brief on opening arguments regarding equitable claims (.3).	ARCH
1368.002	06/20/2019	JS	A	9	110.00	0.50	55.00 Conference with Kent Robison to review case status (.2). Locate and prepare documents/information for Kent Robison (.3).	ARCH
1368.002	06/24/2019	JS	A	9	110.00	1.20	132.00 Continue with review of closing brief to confirm trial exhibit numbers and content (1.2).	ARCH
1368.002	06/25/2019	KRR	A	9	400.00	0.64	256.00 (40%) Work on incorporating Jessica's suggested changes and corrections into closing brief (.8). "Added sites re: Trustees' powers to brief" (.4). Revise citations to no context cases and added language regarding Sam's intent (.4).	ARCH
1368.002	06/25/2019	TMS	A	9	250.00	1.00	250.00 Research re settlor's intent (1); edit closing brief (1)	ARCH
1368.002	06/26/2019	KRR	A	9	400.00	0.93	372.00 (30%) Continue draft of overview, facts, and arguments on ACPA's for Todd's initial closing brief.	ARCH
1368.002	06/27/2019	JS	A	9	110.00	0.30	33.00 Locate and prepare documents/information for Kent Robison for brief.	ARCH
1368.002	06/27/2019	KRR	A	9	400.00	0.40	160.00 (20%) Work on draft of brief. Review Pierre Hascheff testimony regarding indemnification agreement signature pages and margins. Compare Pierre Hascheff's testimony to opinions and report of James Green to provide clarification in brief.	ARCH
1368.002	06/28/2019	JS	A	9	110.00	0.30	33.00 Locate and prepare documents/information for Kent Robison.	ARCH
1368.002	07/01/2019	KRR	A	9	400.00	1.14	456.00 (70%) Work on revisions Todd and Jessica recommended to final brief. Various telephone conference with Jayne and Todd to decide which recommendations, comments, and changes should be incorporated in final brief. Finalize brief and submit for filing. Receive and review Stanley's initial closing brief. Receive Wendy's initial closing brief and "started" review and discussions with Therese.	ARCH
1368.002	07/01/2019	JS	A	9	110.00	0.50	55.00 Locate and prepare documents/information for Kent Robison.	ARCH
1368.002	07/02/2019	KRR	A	9	400.00	0.57	228.00 (30%) Start review and analysis of Wendy's 107 page brief. Order transcripts. Read Don's and Adam's brief to find inconsistencies and or contradictions.	ARCH
1368.002	07/02/2019	JS	A	9	110.00	1.00	110.00 Conference with Kent Robison to review my assignments (.2). Request certified trial transcripts (.2). Review Wendy and Stan closing briefs (.6).	ARCH
1368.002	07/09/2019	KRR	A	9	400.00	0.48	192.00 (20%) Office conference with Don and Todd to review Wendy's brief and issues raised therein, together with various issues pertaining to Todd not being involved in a managerial position on various LLCs and Wendy's sub-trust.	ARCH
1368.002	07/09/2019	JS	A	9	110.00	0.60	66.00 Locate and prepare documents/information for Kent Robison (.3). Follow-up with Sunshine regarding trial transcripts (.3).	ARCH
1368.002	07/09/2019	TMS	A	9	250.00	1.00	250.00 read wendy's closing brief	ARCH
1368.002	07/10/2019	JS	A	9	110.00	0.20	22.00 Follow-up and re-request trial transcripts.	ARCH
1368.002	07/10/2019	KRR	A	9	400.00	0.32	128.00 (20%) Work on brief. Telephone conference with Don Lattin regarding allocation of responsibilities on brief and which office is briefing which issues.	ARCH
1368.002	07/12/2019	JS	A	9	110.00	0.20	22.00 Follow-up with Sunshine regardng trial transcripts.	ARCH

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Client ID 1368.002 Jaksick/Todd									
1368.002	07/15/2019	JS	A	9	110.00	0.50	55.00	Conference with Kent Robison to review my assignments (.2). Index final trial transcripts to order missing days (.3).	ARCH
1368.002	07/16/2019	JS	A	9	110.00	0.20	22.00	Follow-up on status of final trial transcript availability.	ARCH
1368.002	07/17/2019	KRR	A	9	400.00	0.92	368.00	(20%) Prepare for meeting with Todd Jaksick by preparing outline of Wendy's brief (2.1). Met with Todd and Therese to start developing strategy for final brief (2.1). Prepare extensive email to Don and attempt to allocate which law firm is working on which specific issues raised in Wendy's brief (.4).	ARCH
1368.002	07/17/2019	JS	A	9	110.00	3.80	418.00	Conference with Kent Robison to review status of my assignments (.3). Prepare for and attend strategy conference with Kent Robison, Therese Shanks and client (1.2). Begin location and assembly of all authority cited and exhibits listed by Wendy's counsel in brief (2.3).	ARCH
1368.002	07/18/2019	KRR	A	9	400.00	0.36	144.00	(20%) Continue to write rough draft of introduction and pertinent facts for Todd's final brief as individual.	ARCH
1368.002	07/18/2019	JS	A	9	110.00	3.00	330.00	Continue with review of all trial exhibits and authority cited by Wendy and assemble same per sections of Wendy's closing brief.	ARCH
1368.002	07/19/2019	JS	A	9	110.00	2.80	308.00	Locate and prepare copies of all exhibits for Wendy's brief in section order for response.	ARCH
1368.002	07/22/2019	JS	A	9	110.00	2.30	253.00	Continue with organization of trial exhibits per each section of Wendy's brief (1.8). Follow up and copy final trial testimony from Sunshine (.5).	ARCH
1368.002	07/22/2019	TMS	A	9	250.00	7.00	1,750.00	draft argument portion re Indemnification Agreement (4); research re consideration for indemnification agreement (1.5); research re definition of contractual indemnity (1.5)	ARCH
1368.002	07/22/2019	KRR	A	9	400.00	0.24	96.00	(20%) Work on coordinating specific exhibits to aspects of introduction and overview with regarding to Wendy's false accusations and reliance on evidence not presented at trial.	ARCH
1368.002	07/23/2019	JS	A	9	110.00	0.70	77.00	Conference with Kent Robison to review my assignments (.2). Locate and prepare documents/information for Kent Robison (.3). Follow up on trial transcripts (.2).	ARCH
1368.002	07/25/2019	JS	A	9	110.00	0.50	55.00	Organize and prepare sub folder of final trial testimony transcripts.	ARCH
1368.002	07/25/2019	KRR	A	9	400.00	0.42	168.00	(20%) Continue drafting of final brief. Review testimony of Bob Legoy, powers provisions of trusts, and reread and evaluate James Green's report.	ARCH
1368.002	07/29/2019	KRR	A	9	400.00	0.68	272.00	(20%) Office conference with Todd to review draft of final brief (1.2). Draft additional portions of final brief regarding Legoy testimony, 7th amendment, and Lake Tahoe values increasing (2.2).	ARCH
1368.002	07/29/2019	JS	A	9	110.00	3.80	418.00	Conference with Kent Robison to review status of my assignments (.2). Prepare for and attend conference with Kent Robison, Therese Shanks, client to review Closing Brief (.8). Locate and prepare documents/information/exhibit for Brief (2.0). Locate and prepare documents/information for Kent Robison (.8).	ARCH
1368.002	07/29/2019	TMS	A	9	250.00	2.10	525.00	Meeting with client; incorporate changes to brief.	ARCH
1368.002	07/30/2019	JS	A	9	110.00	2.30	253.00	Continue with location and preparation of documents/information/testimony/exhibits for Closing Brief.	ARCH
1368.002	07/30/2019	TMS	A	9	250.00	1.00	250.00	Edit closing brief.	ARCH
1368.002	07/30/2019	KRR	A	9	400.00	0.24	96.00	(20%) Finalize Jaksick brief.	ARCH
1368.002	07/31/2019	JS	A	9	110.00	1.50	165.00	Continue with review and analysis of preparation of trial testimony for Closing Brief exhibits.	ARCH

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Client ID 1368.002 Jaksick/Todd									
1368.002	07/31/2019	KRR	A	9	400.00	0.84	336.00	(20%) Work on final revisions and edits to Todd's closing brief. Assemble necessary exhibits with Jim. Prepare index.	ARCH
1368.002	08/02/2019	KRR	A	9	400.00	0.38	152.00	(20%) Receive Stan Jaksick's closing brief. Review same. Outline and evaluate, forward comments to Don Lattin concerning Stan's apparent acquisition in various issues except the urgency of consummating the settlement agreement.	ARCH
1368.002	08/08/2019	KRR	A	9	400.00	0.20	80.00	(20%) Office meeting for strategy session. Prepare letter to Don.	ARCH
1368.002	08/16/2019	KRR	A	9	400.00	0.36	144.00	(20%) Prepare for meeting with Todd by reviewing latest emails and partial read of Wendy's final brief and partial read of Stan's final brief. Office conference with Stan with Don on line to review latest developments in light of August 8th list of topics to discuss and resolve.	ARCH
1368.002	08/29/2019	KRR	A	9	400.00	0.24	96.00	(20%) Receive, review August 29th settlement agreement concerning Stan's and Todd's agreement fees. Work on analysis of fee issues presented there relative to RSSB's bills and draft letter to client regarding clarification of deal made with Stan as not binding on firm.	ARCH
1368.002	09/05/2019	KRR	A	9	400.00	0.24	96.00	(20%) Conference with Don and Todd to decide, contemplate, analyze, and evaluate options for Todd regarding settlement agreement and events and circumstances between now and Judge Hardy's decision.	ARCH
1368.002	09/09/2019	KRR	A	9	400.00	1.10	440.00	Review Todd's August 29th settlement agreement with Stan. Prepare letter expressing Firm's position. Draft new promissory note to facilitate total and final payment for Firm's representation of Todd as an individual defendant.	ARCH
1368.002	11/07/2019	KRR	A	9	400.00	1.20	480.00	Review notes from meeting with Don and Todd to prepare status/confirmation email concerning things to do and items to be addressed in Notice of Trustee's meeting (.4). Email Todd, Don, and Jessica regarding entities (.2). Receive email from Jessica and review schedules, charts, and contents thereof to determine Todd's relationship with various entities (.6).	ARCH
1368.002	11/13/2019	KRR	A	9	400.00	0.70	280.00	Continue review of Jessica's list only to determine that management, directors and officers are not listed. Work on email for Jessica and sent Jessica an email defining with specificity exactly what list of officers, directors, members, managers, and shareholders is needed to help get Todd removed or out of the line of fire.	ARCH
1368.002	12/11/2019	KRR	A	9	400.00	0.65	260.00	(50%) Office conference regarding status and fee arrangement.	ARCH
1368.002	12/27/2019	KRR	A	9	400.00	0.55	220.00	(50%) Prepare letter on behalf of Todd demanding that trust pay Todd's share of Jack Rabbit capital call. Review prior letter. Receive Todd's suggested changes. Incorporate suggested changes.	ARCH
1368.002	01/28/2020	JS	A	9	110.00	0.20	22.00	Prepare list of official trial transcripts.	ARCH
1368.002	02/06/2020	KRR	A	9	400.00	0.90	360.00	Receive Judge Hardy's order for supplemental briefing and analyze inconsistent and confusing language therein. Telephone conference with Don Lattin regarding purpose of Hardy's inquiries and strategize on how to respond.	ARCH
1368.002	02/07/2020	TMS	A	9	250.00	0.50	125.00	Review order regarding supplemental briefing.	ARCH
1368.002	02/07/2020	KRR	A	9	400.00	1.90	760.00	Receive and review Judge Hardy's order. Review exhibit 561. Telephone conference with Don Lattin to set up meeting for February 10th. Telephone conference with Don Lattin & Todd Jaksick	ARCH

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Client ID 1368.002 Jaksick/Todd								
1368.002	02/10/2020	KRR	A	9	400.00	1.10	440.00	ARCH
							regarding strategies and reasons why Hardy needs additional briefing.	
							(50%) Office conference to strategize on response to court's order. Began reviewing particular exhibits and transcripts to support brief. Review Todd's February 22nd testimony and closing arguments concerning exhibit 561. Review Don's brief in response to motion to compel distribution. Review our brief on equitable claims that address and cover trial exhibit 561.	
1368.002	02/11/2020	KRR	A	9	400.00	0.55	220.00	ARCH
							(50%) Work on supplemental brief incorporating real image of 561. Assemble exhibits included Todd's testimony transcript, Kent's closing argument transcript, exhibit 561, brief by Don, brief by Kent. Receive and review exhibit 90 and incorporate explanation in discussion in supplemental brief.	
1368.002	02/12/2020	KRR	A	9	400.00	1.00	400.00	ARCH
							(50%) Work on brief in response to Judge Hardy's order.	
1368.002	02/12/2020	KRR	A	9	400.00	0.45	180.00	ARCH
							(50%) Review certain citations in Stan's deposition, Todd's deposition and Wendy's deposition concerning Jackrabbit, BHC Trust, and Jaksick Family LLC.	
1368.002	02/13/2020	KRR	A	9	400.00	0.90	360.00	ARCH
							(50%) Work on assembling exhibits for supplemental brief. Analyze summary of deposition testimony to components to exhibit 561. Phone conference and email exchanges Todd regarding BHC and Jackrabbit accountings.	
1368.002	02/14/2020	KRR	A	9	400.00	0.40	160.00	ARCH
							(50%) Finalize Todd's supplemental brief. Review initial disclosures with Jeff concerning the 7 homes involved in claim for shared commission.	
1368.002	02/14/2020	HEW	A	9	250.00	0.25	62.50	ARCH
1368.002	02/18/2020	KRR	A	9	400.00	0.65	260.00	ARCH
							(50%) Telephone conference with Todd regarding revisions to final draft. Telephone conference with Don regarding attorneys' fees' provisions. Modified supplemental brief to include attorneys' fees' provision and insert thoughts, suggested changes.	
1368.002	02/19/2020	KRR	A	9	400.00	0.45	180.00	ARCH
							(50%) Receive, review supplemental brief filed by Stan. Receive, review emergency motion by Wendy's counsel to strike RSSB's brief filed by Todd individually. Telephone conference with Don Lattin regarding the same.	
1368.002	02/19/2020	TMS	A	9	250.00	0.25	62.50	ARCH
							Review motion to strike or whatever it is that Wendy filed.	
1368.002	02/20/2020	KRR	A	9	400.00	0.60	240.00	ARCH
							(50%) Filed response to Wendy's motion to strike Todd's supplemental brief. Telephone conference with Don.	
1368.002	02/20/2020	TMS	A	9	250.00	0.25	62.50	ARCH
1368.002	02/25/2020	KRR	A	9	400.00	0.30	120.00	ARCH
							Review response to motion to strike.	
							(50%) Receive and review Wendy's supplemental brief in the equitable claim's trial. Respond to Don regarding my comments.	
1368.002	02/26/2020	KRR	A	9	400.00	0.40	160.00	ARCH
							(50%) Receive, review Wendy's supplemental brief. Telephone conference with Don Lattin concerning accusations and comments.	
1368.002	02/28/2020	KRR	A	9	400.00	1.20	480.00	ARCH
							(50%) Meeting with Todd to review all Companies, Corporations, LLCs in which Todd is manager, officer, or director to show Todd which Companies he is still exposed on and for in the event there are accusations of mismanagement, failure to disclose, breach of fiduciary duty, those including Basecamp, BBB, Buckhorn, Duck Flat, Gerlach, Incline TSS, Montreux Holding, Pronghorns, Sam Jaksick LLCs, White Pine, WSR Land, Home Camp, ALSB, Spring Mountain, Toiyabe, White Pine Lumber, and Jaksick Family LLC. Work on letter advising Todd of	

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Client ID 1368.002 Jaksick/Todd								
1368.002	03/03/2020	KRR	A	9	400.00	0.30	120.00	ARCH
							exposure for mismanagement of any of the above entities. Work on letter to Kevin Riley making sure that Kevin Riley helped Todd properly report to members and shareholders of entities indentified to comply with fiduciary duties.	
1368.002	03/04/2020	KRR	A	9	400.00	0.90	360.00	ARCH
							(50%) Receive, review emails from Luke Jaksick and text from Wendy concerning accusation that Stan mismanages Toiyabe.	
1368.002	03/09/2020	KRR	A	9	400.00	0.75	300.00	ARCH
							(50%) Work on and complete analysis of Todd's exposure as Officer, Director and or Manager of various family entities in which Family Trust/Issue Trust hold interest. Review hate mail from Wendy and Luke. Telephone conference with Todd. Work on response to Wendy's email containing false information.	
1368.002	03/17/2020	KRR	A	9	400.00	0.85	340.00	ARCH
							(50%) Work on responding to Luke's and Wendy's emails concerning criticism of Todd and threats to sue (.8). Telephone conference with Don regarding my draft in response to Luke (.4). Work on letter to Kevin Riley intended to add additional protection for Todd's position as Treasurer of Toiyabe Investment Company (.3).	
1368.002	03/18/2020	KRR	A	9	400.00	1.55	620.00	ARCH
							(50%) Continue to review decision. Set system up for dictating and preparing judgment. Telephone conference with Mike Kimmel, Don Lattin, and Todd Jaksick.	
1368.002	03/18/2020	TMS	A	9	250.00	0.65	162.50	ARCH
							(50%) Office conference with Don. Work on pending issues. Draft Judgment. Research motions to amend judgment and 54(b) certifications.	
1368.002	03/24/2020	TMS	A	9	250.00	0.50	125.00	ARCH
1368.002	03/24/2020	KRR	A	9	400.00	0.60	240.00	ARCH
							Review order and identify issue's for Rule 59 motions (1). Call regarding same (0.3).	
1368.002	03/25/2020	KRR	A	9	400.00	1.10	440.00	ARCH
							Review memorandum of costs and bases to object. (50%) Motion to strike memorandum of costs. Work on judgment. Email traffic with Adam.	
1368.002	03/25/2020	JS	A	9	110.00	0.50	55.00	ARCH
							(50%) Telephone conference Adam regarding changes to proposed judgment. Revise proposed judgment. Draft letter to Court. Continue work on "prevailing party" issue.	
1368.002	03/25/2020	TMS	A	9	250.00	0.50	125.00	ARCH
							Review trial transcripts to confirm certified copies and prepare chart of same.	
1368.002	03/26/2020	JS	P	9	110.00	0.30	33.00	816
							Research regarding prevailing party (0.5). Review memos of costs and judge's order (0.5).	
1368.002	03/26/2020	KRR	P	9	400.00	1.20	480.00	821
							Locate and prepare documents/information for Kent Robison.	
							(50%) Finalize proposed judgment in light of Adam's comments and Don's comments. Telephone conference with Shannon Parke regarding submission of proposed judgment to Judge Hardy. Revise accordingly. Submit proposed judgment to Judge Hardy for review and analysis. Continue to review prospects for indemnification claim against Stanley based on Hardy's findings that Todd paid because of untimely and incomplete accountings.	
1368.002	03/30/2020	KRR	P	9	400.00	3.10	1,240.00	814
1368.002	03/30/2020	JS	P	9	110.00	0.20	22.00	817
							(50%) Motion to Amend Judgment. Confirm and copy trial transcripts for certified copies.	
1368.002	03/31/2020	JS	P	9	110.00	2.00	220.00	818
							Conference with Kent Robison to review my assignment (.2). Research/review trial exhibits for information for Kent Robison (1.8).	
1368.002	04/01/2020	JS	P	9	110.00	1.50	165.00	819
							Conference with Kent Robison to review my assignments (.2). Review all documents and trial exhibits for documents/information/exhibits for Kent Robison (1.3).	
1368.002	04/01/2020	JS	P	9	110.00	1.80	198.00	820
							Conference with Kent Robison to review my	

Date: 04/09/2020

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

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<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 1368.002 Jaksick/Todd								
								assignments (.2). Review, locate and send cases and information to Kent Robison (.8). Review documents/information/exhibits for documents/information/exhibits for Kent Robison (.8).
Total for Client ID 1368.002					Billable	207.85	48,814.50	Jaksick/Todd (446) Jaksick Family Trust
GRAND TOTALS								
					Billable	207.85	48,814.50	
							-10,417.00	JS - Paralegal
							<u>\$38,397.50</u>	

FILED
Electronically
PR17-00445
2020-04-10 02:52:40 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

EXHIBIT 6

EXHIBIT 6

Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Rate	Amount	Ref #
Client ID 1368.001 Jaksick/Todd							
1368.001	03/22/2019	KRR	A	90		0.50 Postage.	ARCH
1368.001	03/22/2019	KRR	A	87		124.50 In house photocopy expense.	ARCH
1368.001	03/27/2019	KRR	A	85		434.00 Check issued to Sunshine Reporting & Litigation Services Todd Jaksick - Rough Draft.	ARCH
1368.001	03/27/2019	KRR	A	85		442.19 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	04/04/2019	KRR	A	85		213.00 Check issued to Chase Ink Card Filing fee - Answer to Wendy's supplements.	ARCH
1368.001	04/04/2019	KRR	A	85		124.50 Check issued to Chase Ink Card Parking meter - trial.	ARCH
1368.001	04/11/2019	KRR	A	85		137.50 Check issued to Bonanza Reporting & Video Conference Ctr Conference room for Veritext virtual meeting.	ARCH
1368.001	04/11/2019	KRR	A	85		219.29 Check issued to Bonanza Reporting & Video Conference Ctr Deposition of Jessica Clayton, Vol. II.	ARCH
1368.001	04/22/2019	KRR	A	85		200.00 Check issued to Washoe County Clerk Filing fee - Todd Jaksick's Motion in Limine.	ARCH
1368.001	04/25/2019	KRR	A	85		438.82 Check issued to Thomson Reuters - West Legal research	ARCH
1368.001	05/16/2019	KRR	A	85		19.23 Check issued to Sierra Document Management Copy services.	ARCH
1368.001	05/23/2019	KRR	A	87		83.75 In house photocopy expense.	ARCH
1368.001	05/27/2019	KRR	A	85		169.24 Check issued to Sunshine Reporting & Litigation Services Transcript of proceedings and judge's comments.	ARCH
1368.001	06/04/2019	KRR	A	85		33.35 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	07/02/2019	KRR	A	85		50.13 Check issued to Chase Ink Card Working lunch.	ARCH
1368.001	07/09/2019	KRR	A	85		216.90 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	07/25/2019	KRR	A	85		116.48 Check issued to Thomson Reuters - West Legal research.	ARCH
1368.001	08/05/2019	KRR	A	85		153.00 Check issued to Sunshine Reporting & Litigation Services Partial transcript of Todd Jaksick.	ARCH
1368.001	08/05/2019	KRR	A	85		43.00 Check issued to Sunshine Reporting & Litigation Services Ongoing trial transcript.	ARCH
1368.001	08/05/2019	KRR	A	85		225.00 Check issued to Sunshine Reporting & Litigation Services Ongoing trial transcript.	ARCH
1368.001	08/05/2019	KRR	A	85		87.00 Check issued to Sunshine Reporting & Litigation Services Ongoing trial transcript.	ARCH
1368.001	08/15/2019	KRR	A	85		351.80 Check issued to Sunshine Reporting & Litigation Services Transcript of closing arguments by Mr. Spencer.	ARCH
1368.001	08/15/2019	KRR	A	85		914.20 Check issued to Sunshine Reporting & Litigation Services Testimony of Pierre Hascheff.	ARCH
1368.001	08/23/2019	KRR	A	85		107.69 Check issued to Thomson Reuters - West Legal research.	ARCH

Total for Client ID 1368.001

Billable

4,906.07

Jaksick/Todd
(445) SSJs Trust**GRAND TOTALS**

Billable

4,906.07

- 175.63
\$4,749.67

FILED
Electronically
PR17-00445
2020-04-10 02:52:40 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7830695

EXHIBIT 7

EXHIBIT 7

Date: 04/09/2020

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

Page: 1

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 1368.002 Jaksick/Todd							
1368.002	05/16/2019	KRR	A	85		19.23	Check issued to Sierra Document Management Copy services. ARCH
Total for Client ID 1368.002					Billable	19.23	Jaksick/Todd (446) Jaksick Family Trust
GRAND TOTALS							
					Billable	19.23	

Jayne Ferretto

From: eflex@washoecourts.us
Sent: Friday, April 10, 2020 2:54 PM
To: Therese Shanks
Cc: Jayne Ferretto
Subject: NEF: CONS: TRUST: SSJ'S ISSUE TRUST: Mtn for Attorney's Fee: PR17-00445

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

PROOF OF SERVICE OF ELECTRONIC FILING

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

Judge: HONORABLE DAVID A. HARDY

Official File Stamp: 04-10-2020:14:52:40
Clerk Accepted: 04-10-2020:14:53:25
Court: Second Judicial District Court - State of Nevada
Civil
Case Title: CONS: TRUST: SSJ'S ISSUE TRUST
Document(s) Submitted: Mtn for Attorney's Fee
- **Continuation
- **Continuation
- **Continuation
- **Continuation
- **Continuation
- **Continuation
- **Continuation
Filed By: Kent R Robison

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:

STEPHEN C. MOSS, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST
CAROLYN K. RENNER, ESQ. for KEVIN RILEY, TODD B. JAKSICK, MICHAEL S. KIMMEL
DONALD ALBERT LATTIN, ESQ. for KEVIN RILEY, TODD B. JAKSICK, MICHAEL S. KIMMEL
PHILIP L. KREITLEIN, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY TRUST

KENT RICHARD ROBISON, ESQ. for DUCK LAKE RANCH LLC, SAMMY SUPERCUB, LLC,
SERIES A, TODD B. JAKSICK, INCLINE TSS, LTD.

SARAH FERGUSON, ESQ. for STANLEY JAKSICK, SAMUEL S. JAKSICK, JR. FAMILY
TRUST, SSJ'S ISSUE TRUST

MARK J. CONNOT, ESQ, for WENDY A. JAKSICK

THERESE M. SHANKS, ESQ. for DUCK LAKE RANCH LLC, SAMMY SUPERCUB, LLC,
SERIES A, TODD B. JAKSICK, INCLINE TSS, LTD.

ADAM HOSMER-HENNER, ESQ. for STANLEY JAKSICK

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