

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

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

Electronically Filed  
Apr 13 2021 04:10 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**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**

Volume 19 of 22

Pages TJA003206-TJA003381

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

<b>DOCUMENT</b>	<b>DATE FILED or ADMITTED</b>	<b>VOL. NO.</b>	<b>PAGE NO.</b>
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 (SSJ's Issue Trust)	8.2.17	1	TJA000001-000203
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) (Separated)	8.2.17	2	TJA000204-000401
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) (Separated)	8.2.17	3	TJA00402-00585
Respondent Wendy A. Jaksick's Opposition and Objection to Petition	10.10.17	4	TJA000586-000594

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)			
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 (Issue Trust)	10.10.17	4	TJA000607-000614
Commissioner's Recommendation Referring Cases to Probate Judge	10.12.17	4	TJA000615-000617
Order Accepting Transfer	10.17.17	4	TJA000618-000620

Notice of Appearance (Todd B. Jaksick, individually)	11.3.17	4	TJA000621-000623
Association of Counsel	1.2.18	4	TJA000624-000625
Demand for Jury	1.3.18	4	TJA000626-000628
Order Granting Consolidation	1.5.18	4	TJA000629-000631
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	1.19.18	4	TJA000632-000671
Association of Counsel	2.23.18	4	TJA000672-000692
Association of Counsel	2.23.18	4	TJA000693-000712
First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary Duties, for Removal of Trustee(s), and for Declaratory Judgment and Other Relief	2.23.18	4	TJA000713-000752
Order Associating Counsel	3.13.18	4	TJA000753-000754
Order Associating Counsel	3.13.18	4	TJA000755-000756
Notice of Entry of Order	3.13.18	4	TJA000757-000761
Notice of Entry of Order	3.13.18	4	TJA000762-000766
Todd B. Jaksick's Answer and Objections to First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary	4.9.18	4	TJA000767-000779

Duties, For Removal of Trustees and Appointment of Independent Trustee(s) and For Declaratory Judgment and Other Relief			
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 Relief	4.13.18	4	TJA000780-000795
Notice of Appearance	4.17.18	4	TJA000796-000799
Kevin Riley'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	4.17.18	5	TJA000800-000815
Errata to 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	4.19.18	5	TJA000816-000819

Trustees and Appointment of Independent Trustees, and for Declaratory Judgment and Other Relief			
Errata to Kevin Riley'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 Relief	4.19.18	5	TJA000820-000823
Notice of Appearance	6.4.18	5	TJA000824-000827
Notice of Appearance	6.4.18	5	TJA000828-000831
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
Joinder to Stanley S. Jaksick's Answer to First Amended Counter-petition to Surcharge Trustees for Breach of Fiduciary Duties, For	8.7.18	5	TJA000845-000847

Removal of Trustees and Appointment of Independent Trustee(s), and for Declaratory Judgment and Other Relief			
Wendy Jaksick's Motion for Leave to Join Indispensable Parties	11.15.18	5	TJA000848-000855
Todd B. Jaksick's, Individually, Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000856-000872
Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000873-000876
Petitioner's Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000877-000898
Wendy Jaksick's Omnibus Reply in Support of Motion for Leave to Join Indispensable Parties	12.17.18	5	TJA000899-000933
Request for Submission of Wendy A. Jaksick's Motion for Leave to Join Indispensable Parties	12.18.18	5	TJA000934-000936
Order Granting in Part and Denying in Part Motion for Leave to Join Indispensable Parties	1.16.19	5	TJA000937-000948
Pre-Trial Order Regarding Trial	1.22.19	5	TJA000949-000953

Scheduled			
Verdicts	3.4.19	5	TJA000954-000957
Motion for Order Awarding Costs and Attorneys' Fees for Todd Jaksick, Individually, Duck Lake Ranch, LLC, and Incline TSS, Ltd.	3.13.19	6	TJA000958-001157
Petitioner Wendy A. Jaksick's Opposition to Motion for Attorney Fees	3.25.19	6	TJA001158-001175
Reply in Support of Motion for Order Awarding Costs and Attorneys' Fees for Todd Jaksick, Individually, Duck Lake Ranch, LLC and Incline TSS, Ltd.	4.1.19	7	TJA001176-001185
Request for Submission of Motion for Order Awarding Costs and Attorneys' Fees	4.1.19	7	TJA001186-001189
Trial Transcript	5.13.19	7	TJA001190-001202
Order Addressing Evidence at Equitable Trial	5.20.19	7	TJA001203-001274
Stanley Jaksick's Written Closing Arguments	7.1.19	7	TJA001275-001281
Todd B. Jaksick's Closing Argument Brief	7.1.19	7	TJA001282-001362
Wendy Jaksick's Brief of Opening Arguments in the Equitable Claims	7.1.19	8	TJA001363-001470



Trial			
Petitioner's Trial Brief on Equitable Claims	7.1.19	8	TJA001471-001535
Todd B. Jaksick's Closing Argument Brief	7.31.19	9	TJA001536-001623
Petitioner's Reply to Wendy Jaksick's Trial Brief on Equitable Claims	7.31.19	9	TJA001624-001661
Wendy Jaksick's Brief of Closing Arguments in the Equitable Claims Trial	7.31.19	10	TJA001662-001757
Stanley Jaksick's Written Closing Reply Brief	7.31.19	11	TJA001758-001977
Order for Supplemental Briefing	2.6.20	12	TJA001978-001979
Todd Jaksick's Supplemental Brief in Response to the Court's February 6, 2020 Order for Supplemental Briefing	2.18.20	12	TJA001980-002043
Trustees' Supplemental Brief	2.18.20	12	TJA002044-002077
Supplemental Brief by Stanley Jaksick, Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust	2.18.20	12	TJA002078-002085
Wendy Jaksick's Supplemental Brief in the Equitable Claims Trial	2.25.20	12	TJA002086-002093
Order After Equitable Trial	3.12.20	12	TJA002094-002118
Notice of Entry of Order	3.17.20	12	TJA002119-002146

Memorandum of Costs	3.17.20	12	TJA002147-002164
Verified Memorandum of Costs	3.23.20	13	TJA002165-002189
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
Motion to Strike Verified Memorandum of Costs	3.26.20	13	TJA002195-002215
Motion to Retax Costs and Joinder to Motions to Strike	3.26.20	13	TJA002216-002219
Judgment on Verdict and Order After Equitable Trial	4.1.20	13	TJA002220-002254
Notice of Entry of Judgment	4.1.20	13	TJA002255-002292
Petitioners' Verified Memorandum of Costs and Disbursements	4.2.20	14	TJA002293-002409
Memorandum of Costs and Disbursements	4.2.20	14	TJA002410-002430
Memorandum of Costs and Disbursements	4.2.20	14	TJA002431-002442
Joinder to Memorandum of Costs	4.6.20	14	TJA002443-002445
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
Motion for Attorneys' Fees and	4.9.20	15	TJA002451-002615

Costs – Kevin Riley			
Motion for Attorney’s Fees and Costs – Michael Kimmel	4.9.20	16	TJA002616-002769
Omnibus Opposition to Motions to Strike Wendy Jaksick’s Verified Memorandum of Costs filed by Trustees	4.9.20	16	TJA002770-002776
Motion for Attorney Fees and Costs for Todd Jaksick, Individually, for Trial on Equitable Claims	4.10.20	16	TJA002777-002833
Reply in Support of Motion to Strike Verified Memorandum of Costs	4.13.20	17	TJA002834-002841
Request for Submission	4.13.20	17	TJA002842-002845
Order Denying Wendy Jaksick’s Costs	4.21.20	17	TJA002846-002847
Notice of Entry of Order	4.21.20	17	TJA002848-002857
Memorandum of Attorney’s Fees by Stanley Jaksick, as Co-Trustee of the Family Trust	4.22.20	17	TJA002858-002910
Request for Submission	4.22.20	17	TJA002911-002913
Opposition to Motion for Attorney’s Fees and Costs of Michael Kimmel, Individually and as Co-Trustee	4.23.20	17	TJA002914-002930
Opposition to Motion for Attorney’s Fees and Costs of Kevin Riley,	4.23.20	17	TJA002931-002946

Individually and as Co-Trustee of the Family Trust and as Trustee of the BHC Family Trust			
Opposition to Motion for Order Awarding Costs and Attorney's Fees for Todd Jaksick, Individually on Equitable Claims	4.24.20	17	TJA002947-002985
Opposition and Motion to Strike Memorandum of Attorney's Fees by Stanley Jaksick as Co-Trustee of the Family Trust	4.27.20	17	TJA002986-002992
Motion to Alter or Amend the Judgment	4.28.20	17	TJA002993-003000
Trial Transcript	5.13.19	17	TJA001190-001202
Order Regarding Costs	4.30.20	18	TJA003044-003045
Motion to Alter or Amend Judgment, or Alternatively, Motion for New Trial	4.30.20	18	TJA003046-003113
Reply in Support of Motion for Attorney's Fees and Costs	5.1.20	18	TJA003114-003126
Request for Submission	5.1.20	18	TJA003127-003130
Reply to Opposition to Motion for Order Awarding Costs and Attorney's Fees for Todd Jaksick, Individually, For Trial on Equitable Claims	5.1.20	18	TJA003131-003147

Request for Submission	5.1.20	18	TJA003148-003151
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
Limited Joinder to Todd B. Jaksick's Opposition to Wendy Jaksick's Motion to Alter or Amend Judgment, or, Alternatively, Motion for a New Trial	5.12.20	18	TJA003190-003196
Opposition to Alter or Amend the Judgment Award of Attorney's Fees to Wendy	5.12.20	18	TJA003197-003205
Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	5.12.20	19	TJA003206-003324
Opposition to Todd B. Jaksick's Motion to Amend the Judgment	5.13.20	19	TJA003325-003339
Opposition to Wendy Jaksick's Motion to Alter or Amend Judgment, or in the Alternative, Motion for New Trial	5.13.20	19	TJA003340-003344
Reply to Wendy Jaksick's Amended Opposition and Motion to Strike Stanley Jaksick's Verified Memorandum of Attorney's Fees as	5.13.20	19	TJA003345-003348

Co-Trustee of the Family Trust			
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
Request for Submission	5.18.20	19	TJA003358-003365
Reply in Support of Motion to Alter or Amend Judgment	5.19.20	19	TJA003366-003372
Request for Submission	5.19.20	19	TJA003373-003376
Motion to Strike Wendy's Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	5.19.20	19	TJA003377-003381
Reply in Support of Todd B. Jaksick's, Individually, Motion to Amend the Judgment	5.19.20	20	TJA003382-003452
Request for Submission	5.19.20	20	TJA003453-003456
Order Awarding Costs	5.19.20	20	TJA003457
Notice of Entry of Order	5.20.20	20	TJA003458-003461
Petitioner's Verified Memorandum of Attorney's Fees	5.21.20	21	TJA003462-003608
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
Joinder to Todd B. Jaksick's	6.1.20	21	TJA003618-003621

Opposition to Wendy Jaksick's Supplemental Motion			
Opposition to Motion to Strike Wendy's Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	6.1.20	21	TJA003622-003627
Reply in Support of Motion to Strike Wendy's Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	6.8.20	21	TJA003628-003634
Request for Submission	6.8.20	21	TJA003635-003638
Order Resolving Submitted Matters	6.10.20	22	TJA003639-003646
Notice of Appeal	7.10.20	22	TJA003647-003650
Case Appeal Statement	7.10.20	22	TJA003651-003657
Notice of Appeal	7.10.20	22	TJA003658-003661
Case Appeal Statement	7.10.20	22	TJA003662-003669
Notice of Appeal	7.13.20	22	TJA003670-003677
Case Appeal Statement	7.13.20	22	TJA003678-003680
Notice of Cross Appeal	7.21.20	22	TJA003681-003777
Case Appeal Statement	7.21.20	22	TJA003778-003790
Amended Judgment	7.6.20	22	TJA003791-003811

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

<b>DOCUMENT</b>	<b>DATE FILED or ADMITTED</b>	<b>VOL. NO.</b>	<b>PAGE NO.</b>
Amended Judgment	7.6.20	22	TJA003791-003811
Association of Counsel	1.2.18	4	TJA000624-000625
Association of Counsel	2.23.18	4	TJA000672-000692
Association of Counsel	2.23.18	4	TJA000693-000712
Case Appeal Statement	7.10.20	22	TJA003651-003657
Case Appeal Statement	7.10.20	22	TJA003662-003669
Case Appeal Statement	7.13.20	22	TJA003678-003680
Case Appeal Statement	7.21.20	22	TJA003778-003790
Commissioner's Recommendation Referring Cases to Probate Judge	10.12.17	4	TJA000615-000617
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	1.19.18	4	TJA000632-000671
Demand for Jury	1.3.18	4	TJA000626-000628
Errata to Kevin Riley's Answer to First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary Duties, For Removal of	4.19.18	5	TJA000820-000823



Trustees and Appointment of Independent Trustees, and for Declaratory Judgment and Other Relief			
Errata to 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 Relief	4.19.18	5	TJA000816-000819
First Amended Counter-Petition to Surcharge Trustees for Breach of Fiduciary Duties, for Removal of Trustee(s), and for Declaratory Judgment and Other Relief	2.23.18	4	TJA000713-000752
Joinder to Memorandum of Costs	4.6.20	14	TJA002443-002445
Joinder to 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	8.7.18	5	TJA000845-000847

Judgment and Other Relief			
Joinder to Todd B. Jaksick's Opposition to Wendy Jaksick's Supplemental Motion	6.1.20	21	TJA003618-003621
Judgment on Verdict and Order After Equitable Trial	4.1.20	13	TJA002220-002254
Kevin Riley'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	4.17.18	5	TJA000800-000815
Limited Joinder to Todd B. Jaksick's Opposition to Wendy Jaksick's Motion to Alter or Amend Judgment, or, Alternatively, Motion for a New Trial	5.12.20	18	TJA003190-003196
Memorandum of Attorney's Fees by Stanley Jaksick, as Co-Trustee of the Family Trust	4.22.20	17	TJA002858-002910
Memorandum of Costs	3.17.20	12	TJA002147-002164
Memorandum of Costs and Disbursements	4.2.20	14	TJA002410-002430

Memorandum of Costs and Disbursements	4.2.20	14	TJA002431-002442
Motion for Attorney Fees and Costs for Todd Jaksick, Individually, for Trial on Equitable Claims	4.10.20	16	TJA002777-002833
Motion for Attorney's Fees and Costs – Michael Kimmel	4.9.20	16	TJA002616-002769
Motion for Attorneys' Fees and Costs – Kevin Riley	4.9.20	15	TJA002451-002615
Motion for Order Awarding Costs and Attorneys' Fees for Todd Jaksick, Individually, Duck Lake Ranch, LLC, and Incline TSS, Ltd.	3.13.19	6	TJA000958-001157
Motion to Alter or Amend Judgment, or Alternatively, Motion for New Trial	4.30.20	18	TJA003046-003113
Motion to Alter or Amend the Judgment	4.28.20	17	TJA002993-003000
Motion to Retax Costs and Joinder to Motions to Strike	3.26.20	13	TJA002216-002219
Motion to Strike Verified Memorandum of Costs	3.26.20	13	TJA002195-002215
Motion to Strike Wendy's Supplemental Motion in Support	5.19.20	19	TJA003377-003381

of Award of Attorney's Fees to Wendy Jaksick's Attorneys			
Notice of Appeal	7.10.20	22	TJA003647-003650
Notice of Appeal	7.10.20	22	TJA003658-003661
Notice of Appeal	7.13.20	22	TJA003670-003677
Notice of Appearance	6.4.18	5	TJA000824-000827
Notice of Appearance	6.4.18	5	TJA000828-000831
Notice of Appearance	4.17.18	4	TJA000796-000799
Notice of Appearance (Todd B. Jaksick, individually)	11.3.17	4	TJA000621-000623
Notice of Cross Appeal	7.21.20	22	TJA003681-003777
Notice of Entry of Judgment	4.1.20	13	TJA002255-002292
Notice of Entry of Order	3.13.18	4	TJA000757-000761
Notice of Entry of Order	3.13.18	4	TJA000762-000766
Notice of Entry of Order	3.17.20	12	TJA002119-002146
Notice of Entry of Order	4.21.20	17	TJA002848-002857
Notice of Entry of Order	5.20.20	20	TJA003458-003461
Omnibus Opposition to Motions to Strike Wendy Jaksick's Verified Memorandum of Costs filed by Trustees	4.9.20	16	TJA002770-002776
Opposition and Motion to Strike Memorandum of Attorney's Fees by Stanley Jaksick as Co-Trustee of the Family Trust	4.27.20	17	TJA002986-002992
Opposition to Alter or Amend the	5.12.20	18	TJA003197-003205

Judgment Award of Attorney's Fees to Wendy			
Opposition to Motion for Attorney's Fees and Costs of Kevin Riley, Individually and as Co-Trustee of the Family Trust and as Trustee of the BHC Family Trust	4.23.20	17	TJA002931-002946
Opposition to Motion for Attorney's Fees and Costs of Michael Kimmel, Individually and as Co-Trustee	4.23.20	17	TJA002914-002930
Opposition to Motion for Order Awarding Costs and Attorney's Fees for Todd Jaksick, Individually on Equitable Claims	4.24.20	17	TJA002947-002985
Opposition to Motion to Strike Wendy's Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	6.1.20	21	TJA003622-003627
Opposition to Todd B. Jaksick's Motion to Amend the Judgment	5.13.20	19	TJA003325-003339
Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000873-000876

Opposition to Wendy Jaksick's Motion to Alter or Amend Judgment, or in the Alternative, Motion for New Trial	5.13.20	19	TJA003340-003344
Order Accepting Transfer	10.17.17	4	TJA000618-000620
Order Addressing Evidence at Equitable Trial	5.20.19	7	TJA001203-001274
Order After Equitable Trial	3.12.20	12	TJA002094-002118
Order Associating Counsel	3.13.18	4	TJA000753-000754
Order Associating Counsel	3.13.18	4	TJA000755-000756
Order Awarding Costs	5.19.20	20	TJA003457
Order Denying Wendy Jaksick's Costs	4.21.20	17	TJA002846-002847
Order for Supplemental Briefing	2.6.20	12	TJA001978-001979
Order Granting Consolidation	1.5.18	4	TJA000629-000631
Order Granting in Part and Denying in Part Motion for Leave to Join Indispensable Parties	1.16.19	5	TJA000937-000948
Order Regarding Costs	4.30.20	18	TJA003044-003045
Order Resolving Submitted Matters	6.10.20	22	TJA003639-003646
Petition for Confirmation of Trustee and Admission of Trust to the Jurisdiction of the Court, and for Approval of Accountings and other Trust Administration	8.2.17	1	TJA000001-000203

Matters (SSJ's Issue Trust)			
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) (Separated)	8.2.17	2	TJA000204-000401
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) (Separated)	8.2.17	3	TJA00402-00585
Petitioner Wendy A. Jaksick's Opposition to Motion for Attorney Fees	3.25.19	6	TJA001158-001175
Petitioner's Opposition to Wendy Jaksick's Motion for Leave to Join Indispensable Parties	12.6.18	5	TJA000877-000898
Petitioner's Reply to Wendy Jaksick's Trial Brief on Equitable Claims	7.31.19	9	TJA001624-001661
Petitioner's Trial Brief on Equitable Claims	7.1.19	8	TJA001471-001535

Petitioner's Verified Memorandum of Attorney's Fees	5.21.20	21	TJA003462-003608
Petitioners' Verified Memorandum of Costs and Disbursements	4.2.20	14	TJA002293-002409
Pre-Trial Order Regarding Trial Scheduled	1.22.19	5	TJA000949-000953
Reply in Support of Motion for Attorney's Fees and Costs	5.1.20	18	TJA003114-003126
Reply in Support of Motion for Order Awarding Costs and Attorneys' Fees for Todd Jaksick, Individually, Duck Lake Ranch, LLC and Incline TSS, Ltd.	4.1.19	7	TJA001176-001185
Reply in Support of Motion to Alter or Amend Judgment	5.19.20	19	TJA003366-003372
Reply in Support of Motion to Strike Verified Memorandum of Costs	4.13.20	17	TJA002834-002841
Reply in Support of Motion to Strike Wendy's Supplemental Motion in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys	6.8.20	21	TJA003628-003634
Reply in Support of Todd B. Jaksick's, Individually, Motion to	5.19.20	20	TJA003382-003452



Amend the Judgment			
Reply to Opposition to Motion for Order Awarding Costs and Attorney's Fees for Todd Jaksick, Individually, For Trial on Equitable Claims	5.1.20	18	TJA003131-003147
Reply to Wendy Jaksick's Amended Opposition and Motion to Strike Stanley Jaksick's Verified Memorandum of Attorney's Fees as Co-Trustee of the Family Trust	5.13.20	19	TJA003345-003348
Request for Submission	4.13.20	17	TJA002842-002845
Request for Submission	4.22.20	17	TJA002911-002913
Request for Submission	5.1.20	18	TJA003127-003130
Request for Submission	5.1.20	18	TJA003148-003151
Request for Submission	5.18.20	19	TJA003358-003365
Request for Submission	5.19.20	19	TJA003373-003376
Request for Submission	5.19.20	20	TJA003453-003456
Request for Submission	6.8.20	21	TJA003635-003638
Request for Submission of Motion for Order Awarding Costs and Attorneys' Fees	4.1.19	7	TJA001186-001189
Request for Submission of Wendy A. Jaksick's Motion for Leave to Join Indispensable Parties	12.18.18	5	TJA000934-000936

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

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

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

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

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

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

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. 19**, 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:

Donald A. Lattin, Esq.  
Carolyn K. Renner, Esq.  
Maupin, Cox & LeGoy  
4785 Caughlin Parkway  
P. O. Box 30000  
Reno, Nevada 89519  
Email: [dlattin@mcllawfirm.com](mailto:dlattin@mcllawfirm.com) / [crenner@mcllawfirm.com](mailto:crenner@mcllawfirm.com)  
*Attorneys for Appellants/Cross Respondents/Trustees*  
*Todd B. Jaksick, Michael S. Kimmel, Kevin Riley*

Phil Kreitlein, Esq.  
Kreitlein Law Group  
1575 Delucchi Lane, Suite 101  
Reno, Nevada 89502  
Email: [philip@kreitleinlaw.com](mailto:philip@kreitleinlaw.com)  
*Attorneys for Appellant/Cross Respondent Stanley S. Jaksick*

Adam Hosmer-Henner, Esq.  
McDonald Carano  
100 West Liberty Street, 10<sup>th</sup> Floor  
P.O. Box 2670  
Reno, NV 89505  
Email: [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)  
*Attorneys for Appellant/Cross Respondent Stanley S. Jaksick*

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

DATED this 13th day of April, 2021.

Christine O'Brien  
Employee of Robison, Sharp, Sullivan  
& Brust



MARK J. CONNOT (10010)  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899 telephone  
(702) 597-5503 fax  
mconnot@foxrothschild.com

R. KEVIN SPENCER (*Admitted PHV*)  
Texas Bar Card No. 00786254  
ZACHARY E. JOHNSON (*Admitted PHV*)  
Texas Bar Card No. 24063978  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasprobate.com  
zach@dallasprobate.com  
*Attorneys for Respondent/Counter-Petitioner*  
*Wendy A. Jaksick*

**SECOND JUDICIAL DISTRICT COURT**

**WASHOE COUNTY, NEVADA**

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

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

In the Matter of the Administration 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; AND STANLEY S. JAKSICK,  
INDIVIDUALLY AND AS CO-TRUSTEE OF  
THE SAMUEL S. JAKSICK, JR. FAMILY  
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.

**SUPPLEMENTAL MOTION IN**  
**SUPPORT OF AWARD OF**  
**ATTORNEY'S FEES TO WENDY**  
**JAKSICK'S ATTORNEYS**

1 Wendy A. Jaksick ("Wendy") files this *Supplemental Motion in Support of Award of*  
2 *Attorney's Fees to Wendy Jaksick's Attorneys* ("Motion in Support of Award") in support of  
3 the \$300,000 award of attorneys fees to Wendy's attorneys included in the *Order After*  
4 *Equitable Trial* and the *Judgment on Jury Verdict and Court Order on Equitable Claims*.

5 This *Motion* is based on the foregoing points and authorities, the declarations of Mark  
6 J. Connot (the "Connot Declaration") and R. Kevin Spencer (the "Spencer Declaration") filed  
7 concurrently herewith, the exhibits thereto, and any oral arguments the Court may choose to  
8 entertain.

9 DATED this 12<sup>th</sup> day of May, 2020.

10 **FOX ROTHSCHILD LLP**

11 /s/ Mark J. Connot

12 Mark J. Connot (10010)  
13 1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135

14 **SPENCER & JOHNSON, PLLC**

15 /s/ R. Kevin Spencer

16 R. Kevin Spencer (*Admitted PHV*)  
17 Zachary E. Johnson (*Admitted PHV*)  
18 500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
19 *Attorneys for Respondent/Counter-Petitioner*  
20 *Wendy A. Jaksick*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

On August 2, 2017, Todd Jaksick (“Todd”) and Michael Kimmel (“Kimmel”), in their capacities as Co-Trustees of the Family Trust, (collectively, “Petitioners”) filed *Petitions for Confirmation of Trustees and Admission of Trust to the Jurisdiction of the Court, and for Approval of Accountings and Other Trust Administration Matters* (the “Petition”) instituting the current litigation involving the Family Trust and Wendy.

The *Petition* sought Court approval of purported trust accountings for the period April 2013 through December 31, 2016 (the “Purported Trust Accounting”), as well as ratification and Court approval of numerous actions taken by Co-Trustees relieving Trustees from liability from such actions. *Petition* page 6. The *Petition* also sought approval of numerous agreements intended to modify the Family Trust and a release of all liability for actions taken pursuant to such agreements. *See Petition* page 12.

Stanley Jaksick (“Stanley”), in his capacity as Co-Trustee of the Family Trust, refused to join the Purported Trust Accountings and refused to join and pursue the *Petition*. Instead, on October 10, 2017, Stanley filed an opposition to the *Petition* including objections to the approval of the Purported Trust Accountings and other claims concerning the administration of the Family Trust. Stan, the third and only remaining Co-Trustee, did not just refuse to endorse the defective accountings by remaining silent, but affirmatively contested the very accountings filed by his Co-Trustees for Court approval; he knew they were insufficient.

As a result of the lawsuit, Wendy filed a Counter-Petition objecting to the efforts to obtain confirmation of the Purported Accounting and other actions of the Co-Trustee and included claims for breach of fiduciary duty and other actions of all of the Co-Trustees administering the Family Trust during the time period covered the claims in the *Petition*

1 Wendy also sued all the Co-Trustees in their individual capacities to ensure any judgment  
2 payable or enforceable against the Co-Trustees in their Individual capacities would be valid  
3 and enforceable.

4 The Court presided over a two-week jury trial on legal claims from February 14, 2019  
5 to March 4, 2019. Ultimately, the Jury returned a verdict after trial finding for Wendy against  
6 Todd Jaksick for breach of fiduciary duty as Trustee of the SSJ's Issue Trust and as Co-Trustee  
7 of the Family Trust and awarded Wendy \$15,000.00 in damages from Todd. *See Jury Verdict*.

9 On May 13, 2019, the Court began a bench trial to resolve the remaining equitable  
10 claims. The Parties agreed to conduct the equitable trial by submission of briefs, and the  
11 Parties' closing briefs were filed on July 31, 2019.

12 On March 12, 2020, this Court entered the *Order After Equitable Trial* including its  
13 findings, conclusions and rulings on the trial of the equitable claims. The *Order After*  
14 *Equitable Trial* included analysis of the Parties' requests for attorneys fees, and based on "all  
15 facts of record and influenced by the entirety of the pre-trial, legal and equitable proceedings  
16 (including the settlement agreement between Todd and Stan) and uncertainties created by  
17 notarial malfeasance" the Court awarded various Parties fees, including a \$300,000 award of  
18 fees to Wendy's attorneys. *Order After Equitable Trial*, page 17, lines 7-10; page 22, lines 16-  
19 20.  
20

21 On April 28, 2020, *Motion to Alter or Amend the Judgment* ("Motion to Alter  
22 Judgment") was filed by Todd Jaksick, as Trustee of the SSJ's Issue Trust and Co-Trustee of  
23 the Samuel S. Jaksick, Jr. Family Trust ("Family Trust"), Michael S. Kimmel, Individually and  
24 as Co-Trustee of the Family Trust and Kevin Riley, Individually, as former Trustee of the  
25 Family Trust, and Trustee of the Wendy A. Jaksick 2012 BHC Family Trust (collectively,  
26 "Movants"). The *Motion to Alter Judgment* seeks to remove the \$300,000 award of attorney's  
27  
28

1 fees to Wendy's attorneys from the *Judgment* because Movants claim Wendy did not conduct  
2 analysis of the *Brunzell* factors and there is no part of the record which indicates that the Court  
3 conducted this analysis *sua sponte*. *Motion to Alter Judgment*, page 3, lines 17-18.

4 On May 12, 2020, Wendy filed her *Opposition to Motion to Alter or Amend the*  
5 *Judgment – Award of Attorney's Fees to Wendy Jaksick* (the "Opposition"), which argues the  
6 Court's considered and conducted a *Brunzell* factors analysis in reaching its award of \$300,000  
7 to Wendy's attorneys. In addition, to the extent the Court needs additional information to  
8 support its \$300,000 award of fees, Wendy's *Opposition* incorporates this Motion in *Support of*  
9 *Award* as if fully set forth therein.

11 **2. The \$300,000 Award of Fees to Wendy's Attorneys is Reasonable.**

12 The \$300,000 Award of Fees to Wendy's attorneys is based on attorneys fees that are  
13 reasonable under the *Brunzell* factors. The factors enumerated in *Brunzell* are as follows:

- 14 (1) the qualities of the advocate: his ability, his training,  
15 education, experience, professional standing and skill;  
16 (2) the character of the work to be done: its difficulty, its  
17 intricacy, its importance, time and skill required, the  
18 responsibility imposed and the prominence and character of  
19 the parties where they affect the importance of the litigation;  
20 (3) the work actually performed by the lawyer: the skill, time  
21 and attention given to the work;  
22 (4) the result: whether the attorney was successful and what  
23 benefits were derived.

24 *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). These factors  
25 all support that the award of fees in the amount of \$300,000 to Wendy's attorneys was and is  
26 reasonable.

27 "In Nevada, 'the method upon which a reasonable fee is determined is subject to the  
28 discretion of the court,' which 'is tempered only by reason and fairness.'" *Shuette v. Beazer*  
*Homes Holdings Corp.*, 121 Nev. 837, 864, 124 P.3d 530, 548-49 (2005). In determining a  
reasonable fee, "the court is not limited to one specific approach..." *Id.* "[W]hichever method  
is chosen as a starting point, however, the court must continue its analysis by considering the

1 requested amount in light of the factors enumerated by this court in *Brunzell v. Golden Gate*  
2 *National Bank*, namely, the advocate's professional qualities, the nature of the litigation, the  
3 work performed, and the result." *Id.*

4         The first *Brunzell* factor – the qualities of the advocates, including ability, training,  
5 education, experience, and professional standing and skill merit the award. The qualities of  
6 counsel for Wendy Jaksick are fully set forth in the *Connot Declaration* and *Spencer*  
7 *Declaration* attached hereto as *Exhibit "A"*. Additionally, the Court has extensive first-hand  
8 knowledge of the qualities, abilities and skill of Wendy's attorneys having reviewed the many  
9 pleadings and extensive briefing and presided over numerous hearings and the two-week jury  
10 trial.

11         The second *Brunzell* factor – the character of the work to be done; its difficulty, its  
12 intricacy, its importance, time and skill required, the responsibility imposed and the  
13 prominence and character of the parties where they affect the importance of the litigation –  
14 likewise merits an award of the fees described herein. The Court's *Order After Equitable Trial*  
15 confirms the complexity of the subject of the litigation and voluminous documentation  
16 associated with same, the difficulty and intricacy of the work and time and skill required of  
17 Wendy's attorneys, and the skill, time and attention Wendy's attorneys gave the work in  
18 preparing for and trying Wendy's claims. The *Order After Equitable Trial* further confirms the  
19 litigation involved "tens of millions in controversy," "at least seven lawyers zealously  
20 advocating for their clients," and "several million dollars of fees." *Order After Equitable*  
21 *Trial*, page 5, line 12; page 7, lines 13-17.

22         The third *Brunzell* factor – the work actually performed by the lawyer: the skill, time  
23 and attention given to the work – likewise merits an award of attorneys' fees to Wendy's  
24 attorneys. Wendy detailed grounds supporting her attorney's fees and various reasons her  
25 attorney's fees were so substantial in *Wendy Jaksick's Brief of Opening Arguments in the*  
26 *Equitable Claims Trial*, dated July 1, 2019 ("Wendy's Opening Brief"). *Wendy's Opening*  
27 *Brief*, page 101, line 6 – page 102, line 5. The *Connot Declaration* and *Spencer Declaration*  
28

1 confirm the total time dedicated by Mr. Spencer, Mr. Connot and Mr. Johnson to the litigation  
2 of this matter through the filing of the Closing Briefs in the equitable trial on July 31, 2019.  
3 The number of hours for Mr. Connot, Mr. Spencer and Mr. Johnson are 761.30, 664, and  
4 944.75, respectively. The total number of hours for their firms is 3,222.75 hours for a total  
5 amount billed of \$1,522,992.25.

6 Finally, the fourth *Brunzell* factors – the result: whether the attorney was successful and  
7 what benefits were derived – merits an award of the fees. The *Jury Verdict*, the Court's *Order*  
8 *After Equitable Trial* and the *Judgment on Jury Verdict and Court Order on Equitable Claims*  
9 confirm Wendy's attorneys were successful in prevailing in their claim against Todd for breach  
10 of fiduciary duties.

11 In summary, the *Brunzell* factors all merit and support the Court's award of \$300,000 to  
12 Wendy's attorneys.

13 **3. Conclusion**

14 For the foregoing reasons, Wendy requests the Court consider this *Motion* and the  
15 information included herein in support of the Court's award of \$300,000 in fees to Wendy's  
16 attorneys.

17 DATED this 12<sup>th</sup> day of May, 2020.

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

The undersigned does hereby affirm that this **SUPPLEMENTAL MOTION IN SUPPORT OF AWARD OF ATTORNEY'S FEES TO WENDY JAKSICK'S ATTORNEYS** filed by Wendy A. Jaksick in the above-captioned matter does not contain the social security number of any person.

**FOX ROTHSCCHILD LLP**

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

R. Kevin Spencer (*Admitted PHV*)  
Zachary E. Johnson (*Admitted PHV*)  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
*Attorneys for Respondent/Counter-Petitioner*  
*Wendy A. Jaksick*



1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of FOX ROTHSCHILD LLP and  
3 that on this 12<sup>th</sup> day of May, 2020, I served a true and correct copy of **SUPPLEMENTAL**  
4 **MOTION IN SUPPORT OF AWARD OF ATTORNEY'S FEES TO WENDY JAKSICK'S**  
5 **ATTORNEYS** by the Court's electronic file and serve system addressed to the following:

6 Kent Robison, Esq.  
7 Therese M. Shanks, Esq.  
8 Robison, Sharp, Sullivan & Brust  
9 71 Washington Street  
10 Reno, NV 89503  
11 *Attorneys for Todd B. Jaksick, Beneficiary*  
12 *SSJ's Issue Trust and Samuel S. Jaksick, Jr.,*  
13 *Family Trust*

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

13 Phil Kreitlein, Esq.  
14 Kreitlein Law Group  
15 1575 Delucchi Lane, Ste. 101  
16 Reno, NV 89502  
17 *Attorneys for Stanley S. Jaksick, Co-Trustee*  
18 *Samuel S. Jaksick, Jr. Family Trust*

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

19 DATED this 12<sup>th</sup> day of May, 2020.

20 /s/ Doreen Loffredo  
21 An Employee of Fox Rothschild LLP  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**INDEX OF EXHIBITS**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>PAGES</b>
A	Declarations of Mark J. Connot and R Kevin Spencer	106

FILED  
Electronically  
PR17-00445  
2020-05-12 04:49:04 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7873822

EXHIBIT A

EXHIBIT A

MARK J. CONNOT (10010)  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899 telephone  
(702) 597-5503 fax  
mconnot@foxrothschild.com

R. KEVIN SPENCER (*Admitted PHV*)  
Texas Bar Card No. 00786254  
ZACHARY E. JOHNSON (*Admitted PHV*)  
Texas Bar Card No. 24063978  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasprobate.com  
zach@dallasprobate.com  
*Attorneys for Respondent/Counter-Petitioner Wendy A. Jaksick*

**SECOND JUDICIAL DISTRICT COURT**

**WASHOE COUNTY, NEVADA**

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

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

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

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

WENDY JAKSICK,  
Respondent and Counter-Petitioner,

**DECLARATION OF MARK J.  
CONNOT**

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; AND STANLEY S. JAKSICK,  
INDIVIDUALLY AND AS CO-TRUSTEE OF  
THE SAMUEL S. JAKSICK, JR. FAMILY  
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.

//

//

1 I, Mark J. Connot, do hereby affirm under penalty of perjury that the assertions of this  
2 Declaration are true and based upon personal knowledge of the facts stated herein:

- 3 1. The team of attorneys who worked on this case were highly skilled, qualified, and  
4 sufficiently trained to merit the award. I am an attorney currently licensed to practice  
5 law in the states of Nevada and South Dakota. I currently serve as both the Office  
6 Managing Partner and the Litigation Department Administrative Partner for the Las  
7 Vegas office of Fox Rothschild LLP. Throughout this action I served as co-counsel in  
8 this action for Wendy Jaksick with R. Kevin Spencer. Mr. Spencer and I shared  
9 responsibilities in formulating case strategies, deposing witnesses, and preparing for  
10 trial. I was involved in all aspects of the case including discovery, motion practice, and  
11 trial, among other things.
- 12 2. On April 1, 2020, the Court entered its *Judgment* and ordered the Trusts pay combined  
13 attorneys' fees of \$300,000.00 to Wendy's attorneys for prevailing on the claim against  
14 Todd for breach of fiduciary duty. Since July 16, 2018, Fox Rothschild incurred a total  
15 of \$719,323.50 in fees for 1,462.50 hours billed in the above referenced case.
- 16 3. First, I am a litigator with 28 years of experience in the profession. I have a broad-based  
17 litigation practice in federal and state courts focusing on complex commercial litigation  
18 and business disputes, including shareholder derivative actions, partnership and  
19 shareholder disputes and business torts, commercial transactions, complex real estate  
20 issues, banking and lender issues, and labor and employment. *A true and correct copy*  
21 *of my biography is attached hereto as Exhibit "I".*
- 22 4. Prior to moving to Nevada, I began my legal career as a federal court law clerk in South  
23 Dakota. I practiced law in South Dakota for more than 14 years, where I served as  
24 president of the South Dakota Trial Lawyers Association as well as served as a member  
25  
26  
27  
28

- 1 of the Board of Governors of the South Dakota Trial Lawyers Association. I have served  
2 as lead counsel in more than 75 jury and court trials in state and federal courts.
- 3 5. I have received a number of awards and accolades, including serving as a Justice of the  
4 Supreme Court of the Oglala Sioux Nation and receiving a Martindale-Hubbell AV  
5 rating. I am consistently named as "Top Lawyers: The Best of the Best in Southern  
6 Nevada" by, *Vegas Inc.*, "Mountain State Super Lawyer" by *Super Lawyers Magazine*,  
7 among other awards.
- 8
- 9 6. In addition to my practice of law, I serve on the Board of Directors for Junior  
10 Achievement of Southern Nevada, currently as its Chairman, volunteer with the  
11 Children's Attorney Project, and have contributed more than 1,000 hours of my time to  
12 pro bono matters for the Children's Attorney Project. In 2014, I was recognized by the  
13 Legal Aid Center of Southern Nevada for the most pro bono hours by an attorney, having  
14 provided more than 500 hours of pro bono hours in 2014.
- 15
- 16 7. My hourly rate on this matter was \$640.00 and I billed 761.30 hours through June of  
17 2019. *A true and correct copy of my Detailed Billing Report is attached hereto as Exhibit*  
18 *"2"*. I primarily worked on deposing witnesses, formulating a case strategy, arguing at  
19 hearings, preparing and approving pleadings and preparing and representing Wendy at  
20 trial.
- 21
- 22 8. Second, our highly trained and qualified staff consisting of attorneys and paralegals  
23 assisted with the above referenced cause. Amanda Hunt was an associate at Fox  
24 Rothschild. Ms. Hunt has been practicing for approximately ten (10) years. During law  
25 school, Ms. Hunt was a judicial extern for the Honorable DeCarl Adler of the U.S.  
26 Bankruptcy Court in the Southern District of California. Ms. Hunt's hourly rate is
- 27
- 28

1 \$320.32 and billed 527 hours. Ms. Hunt primarily worked on researching key legal  
2 issues and drafting pleadings relating to her research.

3 9. Kevin Sutehall is Counsel at Fox Rothschild. Mr. Sutehall has been practicing for 17  
4 years and is admitted to the U.S. District Court, District of Nevada. Mr. Sutehall's  
5 primary practice is commercial and business litigations, including business/shareholder  
6 disputes, contract issues, debt collection, among other matters. Kevin Sutehall's hourly  
7 rate is \$475.00 and billed 44.30 hours. Mr. Sutehall responsibilities consisted of  
8 formulating case strategies and drafting motions.  
9

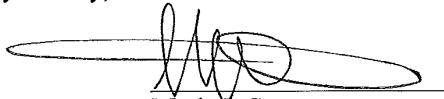
10 10. Other people from Fox Rothschild who assisted in the case were two paralegals: (i) P.M.  
11 Chlum and (ii) J.A. Dodds. P.M. Chlum's hourly rate is \$295.00 and billed 39.60 hours.  
12 J.A. Dodds's hourly rate is \$340.00 and billed 62.50 hours. The paralegals  
13 responsibilities involved preparing and receiving discovery.  
14

15 11. Additional expenses incurred in the above referenced cause were research costs for  
16 \$1,531.16, subpoena service for \$2,536.41, depositions and transcripts for \$23,975.42,  
17 medical and hospital records for \$191.00, and expert fees for \$19,396.50.  
18

19 12. As shown in Exhibit 2, all other individuals from Fox Rothschild each billed less than  
20 fifteen (15) hours on the matter. The entire Fox Rothschild litigation team is skilled,  
21 experienced, and holds a high standing in the legal community. Therefore, the Court's  
22 award is warranted and more than reasonable under the circumstances.

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

25 Executed on this 12 day of May, 2020.

26   
27 Mark J. Connot  
28

# EXHIBIT 1

# EXHIBIT 1





**Fox Rothschild** LLP  
ATTORNEYS AT LAW

---



## **Mark J. Connot**

Partner

**Las Vegas, NV**  
Tel: 702.699.5924  
Fax: 702.597.5503

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

---

Mark, Office Managing Partner of Fox's Las Vegas Office, has a broad-based litigation practice in federal and state courts focusing on complex commercial litigation and business disputes, including shareholder derivative actions, partnership and shareholder disputes and business torts, commercial transactions, complex real estate issues, banking and lender issues, and labor and employment. He has a lengthy background dealing with all manner of technological issues and has a keen interest in the evolving drone industry. As a practicing lawyer with an M.B.A. degree, Mark approaches clients' matters from both a legal and business perspective and offers practical and efficient solutions.

Throughout his years of legal experience, Mark has been involved with hundreds of arbitrations and mediations across a broad spectrum of legal matters. He has served as lead counsel in more than 75 jury and court trials in state and federal courts and has also appeared before numerous administrative tribunals. In addition to his private practice, Mark served as a Justice of the Supreme Court of the Oglala Sioux Nation. He has represented various individuals and entities in Tribal Court matters ranging from partnership dissolution, employment and corporate matters, as well as personal injury claims. Mark is also well-versed in defending deceptive trade practices act claims, and has represented national companies in such matters involving claims for penalties in excess of \$1 billion.

Mark has served as president of the South Dakota Trial Lawyers Association as well as a member of the Board of Governors of the South Dakota Trial Lawyers Association. In addition, Mark served as chair of the South Dakota State Bar Negligence and Tort Law Committee.

Within the firm, Mark serves as the Litigation Department administrative partner in the Las Vegas office.

### **Before Fox Rothschild**

Mark has presented various CLE seminars on insurance bad faith, punitive damages and Daubert issues and is a frequent guest lecturer at law school classes and undergraduate business law classes. He is active in the community and has served on various nonprofit boards, including United Way.

Mark has been quoted concerning real estate and litigation issues in the *Wall Street Journal*, *Los Angeles Times*, *Las Vegas Review Journal*, *Las Vegas Sun* and in numerous other newspapers and online news sources, as well as appearing on Fox Business Network, Face to Face with Jon Ralston and "In Business" on Las Vegas One.

In addition to his legal practice, Mark is very involved in the community, and focuses his efforts on programs to assist children. He serves on the Board of Directors for Junior Achievement of Southern Nevada, whose mission is "To inspire and prepare young people to succeed in a global economy." Mark is also very involved with the Children's Attorney



Project (CAP), a program of the Legal Aid Center of Southern Nevada. CAP provides attorneys at no charge to children who have been victims of abuse and/or neglect. Mark has contributed more than 1000 hours of his time to pro bono matters and in 2014 was recognized by Legal Aid Center of Southern Nevada for the most pro bono hours by an attorney.

#### **Honors & Awards**

- Named among the Top 100 attorneys in Nevada in the Legal Elite edition by *Nevada Business Magazine* (2016)
- Named to "Top Lawyers: The Best of the Best in Southern Nevada" by *Vegas Inc.* (2013-2015)
- Martindale-Hubbell AV rated
- Named to "Super Lawyers" (2013)
- Named as a "Mountain State Super Lawyer" by *Super Lawyers Magazine* (2015-2018)
- Named in "Super Lawyers Business Edition" in the area of Litigation (2013)
- Named to "Top Lawyers" by *Desert Companion* (2013 and 2014)
- Legal Aid Center of Southern Nevada Award for Most Pro Bono Hours (2014)

#### **Practice Areas**

- Litigation
- IP Litigation
- Patents
- Labor & Employment
- Appellate Practice
- Aviation
- Directors' & Officers' Liability & Corporate Governance
- E-Discovery
- Eminent Domain/Condemnation
- Insurance
- Fiduciary Litigation
- Drone Law
- Cannabis Law
- Alternative Dispute Resolution
- Title Insurance
- Securities Industry

#### **Bar Admissions**

- Nevada
- South Dakota

#### **Education**

- University of South Dakota (J.D. and M.B.A., *with honors*)
- South Dakota State University (B.S.)
  - Economics



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

---

#### **Memberships**

- Vice-President, Nevada AUVSI Chapter
- President, South Dakota Trial Lawyers Association, 2004-2005

#### **Board of Directors**

- South Dakota Trial Lawyers Association (President, 2004 and former member, board of governors)
- South Dakota State Bar Negligence and Tort Law Committee (Former chairperson)
- Board Chairman, Junior Achievement of Southern Nevada

# EXHIBIT 2

# EXHIBIT 2

-&a5L +&l4E +(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

INDEX	DATE	***PROFESSIONAL SERVICES***	TASK	ACTV	HOURS WORKED	TKPR NO	TIMEKEEPER NAME	TIME VALUE THIS PERIOD	RUNNING TOTAL
CLIENT 180963		JAKSICK, WENDY					LAST DATE BILLED		FEES and DISB
MATTER 180963.00001		ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL					DATE BILLED THRU		
MPRAC 1034							LAST PYMENT DATE		
-&a5L +&l4E +(s015H									
26814165	07/06/18	TRAVEL TO RENO AND ATTEND DEPOSITION OF M KIMMEL	N/A	N/A	8.50	3071	CONNOT, M. J.	5,440.00	5,440.00
26803885	07/20/18	FOLLOW UP ON DEPOSITIONS; REVIEW CORRESPONDENCE FROM KENT ROBISON;	N/A	N/A	2.20	3071	CONNOT, M. J.	1,408.00	6,848.00
26814323	07/31/18	REVIEW DISCOVERY RESPONSES REVIEW UPCOMING DEPOSITIONS; FINALIZE DISCOVERY REQUESTS; OUTLINE ISSUES	N/A	N/A	4.20	3071	CONNOT, M. J.	2,688.00	9,536.00
26930860	08/01/18	PREPARE JOINDER; REVIEW ISSUES FOR UPCOMING DEPOSITIONS AND SCHEDULING; PREPARE NOTE TO FILE; EXCHANGE EMAILS WITH CO-COUNSEL AND REVIEW EMAILS RE: [REDACTED]	N/A	N/A	1.40	3071	CONNOT, M. J.	896.00	10,432.00
26931002	08/02/18	REVIEW ISSUES FOR DEPOSITION AND CONTINUE TO REVIEW DOCUMENT PRODUCTION; REVIEW ANSWER FILED BY STAN JAKSICK; EXCHANGE EMAILS WITH ZACH JOHNSON	N/A	N/A	1.40	3071	CONNOT, M. J.	896.00	11,328.00
26931132	08/06/18	REVIEW OBJECTION TO SUBPOENA FROM HOME CAMP	N/A	N/A	.30	3071	CONNOT, M. J.	192.00	11,520.00
26939782	08/09/18	REVIEW EMAILS TO SEND TO ADAM HOSMER RE: STAN JAKSICK AND REVISE SAME; REVIEW BASECAMP AND BRIGHT HOLLAND SUPPLEMENT TO OBJECTIONS	N/A	N/A	.90	3071	CONNOT, M. J.	576.00	12,096.00
26858629	08/13/18	TRAVEL TO RENO; ATTEND TODD JAKSICK DEPOSITION; CONTINUE TO REVIEW AND ANALYZE DOCUMENTS AND STRATEGY	N/A	N/A	14.20	3071	CONNOT, M. J.	9,088.00	21,184.00
26859480	08/14/18	DEPOSITION OF TODD JAKSICK; CONTINUE TO REVIEW DOCUMENTS AND STRATEGIZE	N/A	N/A	12.80	3071	CONNOT, M. J.	8,192.00	29,376.00
26861929	08/14/18	RESEARCH PATTERN NV JURY INSTRUCTIONS FOR VARIOUS CLAIMS PER DIRECTIONS FROM CONNOT AND HAVE THEM SENT TO HIM	N/A	N/A	2.00	3083	SUTEHALI, K. M.	950.00	30,326.00
26888499	08/15/18	DEPOSITION OF TODD JAKSICK AND FURTHER PREPARATION AND CONFERENCES FOR CONTINUED DEPOSITION	N/A	N/A	11.20	3071	CONNOT, M. J.	7,168.00	37,494.00
26891156	08/15/18	LEGAL RESEARCH RE: AUTHORITY ON NEVADA STATUTE CONCERNING STATEMENTS BY DECEASED AND SEND TO CONNOT	N/A	N/A	.20	3083	SUTEHALI, K. M.	95.00	37,589.00
26888501	08/16/18	TODD JACKKICK DEPOSITION AND STRATEGY	N/A	N/A	13.10	3071	CONNOT, M. J.	8,384.00	45,973.00

-6a5L -614E +(s015H  
B/A EMAIL: MConnot@foxrothschild.com  
R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	
MPRAC	1034		LAST PYMENT DATE	
MNAME	180963.00001			
FOLLOWING TERMINATION OF SAME BY				
TODD JAKSICK'S COUNSEL; RETURN TO				
LAS VEGAS				
26881051	08/16/18	RESEARCH TERMINATING DEPOSITIONS, N/A N/A .50 3083 SUTEHALL, K. M.	237.50	46,210.50
NEVADA AUTHORITY, GENERAL FEDERAL				
AUTHORITY ON SAME AND SEND TO CONNOT				
26888533	08/17/18	REVIEW AND ANALYZE EMERGENCY MOTION N/A N/A .50 3071 CONNOT, M. J.	320.00	46,530.50
TO TERMINATE AND OUTLINE ISSUES				
RAISED BY SAME				
26943580	08/20/18	REVIEW AND ANALYZE OBJECTION LETTER N/A N/A 2.10 3071 CONNOT, M. J.	1,344.00	47,874.50
FROM MAUPIN COX; REVIEW AND ANALYZE				
SUPPLEMENTAL PRODUCTION FROM DON				
LATTIN				
26918406	08/21/18	EMAILS REGARDING SERVICE OF NEVADA N/A N/A .20 1554 DODDS, J.A.	68.00	47,942.50
SUBPOENA TO CALIFORNIA ENTITY;				
REVIEW NEVADA SUBPOENA.				
26918413	08/22/18	REVIEW CALIFORNIA CODE OF CIVIL N/A N/A .90 1554 DODDS, J.A.	306.00	48,248.50
PROCEDURE REGARDING SERVICE OF OUT				
OF STATE SUBPOENA; EMAILS TO				
DEPOSITION OFFICER; EMAILS WITH				
NEVADA OFFICE REGARDING SAME.				
26943303	08/24/18	EXCHANGE EMAILS WITH ZACH; REVIEW N/A N/A 2.40 3071 CONNOT, M. J.	1,536.00	49,784.50
DRAFT OPPOSITION TO MOTION TO				
TERMINATE; DRAFT EMAIL TO DON				
LATTIN; PREPARE NOTICE OF				
VOLUNTARY DISMISSAL; UPDATE TASK LIST				
26945233	08/28/18	FOLLOW UP ON DISCOVERY ISSUES; N/A N/A 1.20 3071 CONNOT, M. J.	768.00	50,552.50
EXCHANGE EMAILS WITH KEVIN SPENCER				
AND ZACH JOHNSON; REVIEW DR' SMITH				
RECORDS; REVIEW EMAIL FROM KENT				
ROBISON; REVIEW EMAIL FROM DON				
LATTIN; UPDATE TASK LIST				
26952613	08/29/18	EMAILS REGARDING SUBPOENA; RESEARCH N/A N/A .40 1554 DODDS, J.A.	136.00	50,688.50
REGARDING NOTICE.				
26945379	08/29/18	REVIEW EMAILS RE: DEPOSITION N/A N/A .80 3071 CONNOT, M. J.	512.00	51,200.50
SCHEDULING; FOLLOW UP ON OPPOSITION				
TO MOTION TO TERMINATE;				
26952616	08/30/18	RESEARCH REGARDING CA NOTICE N/A N/A 1.60 1554 DODDS, J.A.	544.00	51,744.50
REQUIREMENTS TO SUBPOENA MEDICAL				
RECORDS OF A DECEDENT; EMAILS				
REGARDING SAME; CONFER WITH Y.				
GALLEGOS REGARDING SAME.				
26945386	08/30/18	REVIEW AND REVISE OPPOSITION TO N/A N/A 3.10 3071 CONNOT, M. J.	1,984.00	53,728.50
MOTION TO TERMINATE; TELEPHONE				
CONFERENCE WITH KEVIN SPENCER AND				
ZACH JOHNSON; CONTINUE TO REVIEW				



-6a5L -614E +(s015H  
B/A EMAIL: MConnot@foxrothschild.com  
B/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY					LAST DATE BILLED			FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL					DATE BILLED THRU			
MPRAC	1034						LAST PYMENT DATE			
MNAME	180963.00001									
27096601	09/21/18	SHORTENING TIME FINALIZE MOTION TO EXTEND; PREPARE OST MOTION; FOLLOW UP ON SUBPOENA ACCEPTANCE OF SERVICE; OUTLINE ISSUES FOR PETITION TO REMOVE TRUSTEE CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	N/A	2.20	3071	CONNOT, M. J.	1,408.00	73,065.00	
27101097	09/21/18	BEGUN REVIEW OF PETITIONS AND FILE. REVIEW LOCAL RULES REGARDING FOREIGN SUBPOENAS, AND EMAILS FROM CO-COUNSEL REGARDING SAME.	N/A	N/A	.90	4880	HUNT, A.	288.00	73,353.00	
27101172	09/21/18	BEGUN PRELIMINARY REVIEW OF THE FILE	N/A	N/A	2.50	4880	HUNT, A.	800.00	74,153.00	
27108747	09/24/18	RESEARCH REGARDING REMOVAL OF A TRUSTEE	N/A	N/A	.20	1554	DODDS, J.A.	68.00	74,221.00	
27103701	09/24/18	REVIEW CODE OF CIVIL PROCEDURE REGARDING FOREIGN SUBPOENA; PREPARE NOTICE TO CONSUMER, CA SUBPOENA, EMAIL SAME TO CO-COUNSEL FOR REVIEW.	N/A	N/A	2.40	4880	HUNT, A.	768.00	74,989.00	
27099259	09/24/18	CALL WITH CO-COUNSEL REGARDING	N/A	N/A	2.50	4880	HUNT, A.	800.00	75,789.00	
27108679	09/25/18		N/A	N/A	.50	1554	DODDS, J.A.	170.00	75,959.00	
27076269	09/25/18		N/A	N/A	.20	1828	GALLEGOS, Y. M.	104.00	76,063.00	
27103224	09/25/18	REVIEW SUPPLEMENT TO PETITION; REVIEW ACCEPTANCES OF SERVICE; REVIEW BUCKHORN LAND AND LIVESTOCK, LLC'S SUPPLEMENT TO ITS OBJECTIONS AND RESPONSES TO SUBPOENA DUCES TECUM; AND BRIGHT HOLLAND CO.'S SECOND SUPPLEMENT TO ITS OBJECTIONS AND RESPONSES TO SUBPOENA DUCES TECUM.	N/A	N/A	1.00	3071	CONNOT, M. J.	640.00	76,703.00	
27099368	09/25/18	ADDITIONAL RESEARCH REGARDING REMOVAL OF TRUSTEE	N/A	N/A	4.10	4880	HUNT, A.	1,312.00	78,015.00	
27106693	09/25/18	REVIEW OF T. JAKSICK DEPOSITION TRANSCRIPT	N/A	N/A	3.60	4880	HUNT, A.	1,152.00	79,167.00	
27111632	09/26/18	CONTINUED REVIEWING DEPOSITION OF T. JAKSICK	N/A	N/A	2.30	4880	HUNT, A.	736.00	79,903.00	
27099448	09/26/18	BEGIN DRAFT OF MOTION TO REMOVE TRUSTEE	N/A	N/A	2.60	4880	HUNT, A.	832.00	80,735.00	
27099534	09/27/18	REVISED MOTION TO REMOVE TRUSTEE	N/A	N/A	7.50	4880	HUNT, A.	2,400.00	83,135.00	
27099593	09/27/18	CONTINUED REVIEW OF FILE INCLUDING T. JAKSICK DEPOSITION.	N/A	N/A	1.20	4880	HUNT, A.	384.00	83,519.00	
27094262	09/27/18	ADDITIONAL RESEARCH REGARDING	N/A	N/A	1.40	4880	HUNT, A.	448.00	83,967.00	



-6a5L -614E -(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	LAST PYMENT DATE
MPRAC 1034			
MNAME 180963.00001			
27103192	09/28/18	2.00 4880 HUNT, A.	640.00 84,607.00
27162475	10/01/18	2.60 3071 CONNOT, M. J.	1,664.00 86,271.00
27120698	10/01/18	.50 4880 HUNT, A.	160.00 86,431.00
27120876	10/01/18	.30 4880 HUNT, A.	96.00 86,527.00
27229628	10/02/18	1.20 3071 CONNOT, M. J.	768.00 87,295.00
27250890	10/03/18	2.10 3071 CONNOT, M. J.	1,344.00 88,639.00
27122422	10/03/18	1.20 4880 HUNT, A.	384.00 89,023.00
27122523	10/03/18	1.10 4880 HUNT, A.	352.00 89,375.00
27122524	10/03/18	.60 4880 HUNT, A.	192.00 89,567.00
27147327	10/04/18	.20 4880 HUNT, A.	64.00 89,631.00
27270811	10/04/18	6.90 4880 HUNT, A.	2,208.00 91,839.00
27179628	10/05/18	1.10 3071 CONNOT, M. J.	704.00 92,543.00
27251084	10/05/18	.90 3071 CONNOT, M. J.	576.00 93,119.00
27176563	10/05/18	3.00 4880 HUNT, A.	960.00 94,079.00
27277167	10/05/18	3.00 4880 HUNT, A.	960.00 95,039.00
27251232	10/08/18	1.00 3071 CONNOT, M. J.	640.00 95,679.00
27149757	10/09/18	.20 4880 HUNT, A.	64.00 95,743.00

~a5L \*e14E ~{s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEEs and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		LAST PYMENT DATE
MPRAC	1034							
MNAME	180963.00001							
27260387	10/10/18	EXCHANGE EMAILS WITH KEVIN SPENCER AND ZACH JOHNSON RE: [REDACTED]; REVIEW AND REVISE MOTION TO COMPEL; EXCHANGE EMAILS WITH KENT ROBISON RE: HASCHEFF DOCUMENTS;	N/A	N/A	2.50 3071	CONNOT, M. J.	1,600.00	97,343.00
27260674	10/11/18	TELEPHONE CONFERENCE WITH ADAM HOSMER-HENNER RE: HASCHEFF DOCUMENTS AND DEPOSITION; TELEPHONE CONFERENCE WITH ZACH JOHNSON; FOLLOW UP ON DISCOVERY ISSUES; EXCHANGE EMAILS RE: HASCHEFF DOCUMENTS AND HASCHEFF DEPOSITION; REVIEW AND ANALYZE PH DOCUMENTS 1 THROUGH 296 FROM KENT ROBISON	N/A	N/A	2.40 3071	CONNOT, M. J.	1,536.00	98,879.00
27274326	10/11/18	REVIEWED BOTH OPPOSITIONS TO EMERGENCY MOTION TO EXTEND DISCOVERY DEADLINES	N/A	N/A	1.50 4880	HUNT, A.	480.00	99,359.00
27274738	10/11/18	CASE STRATEGY CONFERENCES WITH M. CONNOT	N/A	N/A	1.00 4880	HUNT, A.	320.00	99,679.00
27274742	10/11/18	OUTLINED AND BEGUN DRAFT OF RESPONSE TO OPPOSITIONS TO MOTION TO EXTEND DISCOVERY DEADLINES	N/A	N/A	2.50 4880	HUNT, A.	800.00	100,479.00
27274745	10/11/18	REVIEWED MOTION TO COMPEL AND EMAIL TO M. CONNOT REGARDING THE SAME	N/A	N/A	1.00 4880	HUNT, A.	320.00	100,799.00
27179603	10/12/18	REVIEW AND REVISE REPLY IN SUPPORT OF MOTION TO EXTEND DEADLINES	N/A	N/A	.90 3071	CONNOT, M. J.	576.00	101,375.00
27260835	10/12/18	REVIEW AND REVISE MOTION TO COMPEL; TELEPHONE CONFERENCE WITH ADAM HOSMER HENNER; REVIEW AND ANALYZE 30(B) (6) DEPOSITION ISSUES; REVIEW PETITION FOR RECONVEYANCE; PREPARE EMAIL RE: INSPECTION OF HASCHEFF DOCUMENTS; REVISE REPLY IN SUPPORT OF MOTION TO EXTEND	N/A	N/A	2.20 3071	CONNOT, M. J.	1,408.00	102,783.00
27176561	10/12/18	REVIEWED AND KEY CITED CASE LAW CITED BY T. JAKSICK IN OPPOSITION TO MOTION TO EXTEND DISCOVERY; RESEARCH REGARDING THE SAME.	N/A	N/A	3.40 4880	HUNT, A.	1,088.00	103,871.00
27277149	10/12/18	BEGUN OUTLINE AND DRAFT OF RESPONSE TO MOTION TO EXTEND DISCOVERY	N/A	N/A	4.10 4880	HUNT, A.	1,312.00	105,183.00
27261452	10/15/18	EXCHANGE EMAILS RE: TELEPHONE CONFERENCE; REVISE RESPONSE IN SUPPORT OF MOTION TO EXTEND DEADLINES; REVIEW DISCOVERY ISSUES AND HASCHEFF DOCUMENTS; REVIEW COURT	N/A	N/A	2.40 3071	CONNOT, M. J.	1,536.00	106,719.00



-6a5L +-614E +(s015H B/A EMAIL: MConnot@foxrothschild.com		FOX ROTHSCHILD LLP DETAILED BILLING REPORT PROFORMA #		(RUN 05/12/20 11:44 ) THRU 07/31/19	FEES and DISB	
B/A EMAIL:						
B/ATTY LOC: 71 LAS VEGAS						
BILLING ATTORNEY: 3071 MARK J. CONNOT						
-----						
CLIENT 180963	JAKSICK, WENDY					
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	N/A	N/A	1.10 3071	CONNOT, M. J.	119,519.00
MPRAC 1034						
MNAME 180963.00001						
27272596	10/24/18					
	REVIEW ROBISON EMAIL; REVIEW T					
	JAKSICK RESPONSE TO 5TH REP; REVIEW					
	ALEXANDER EMAIL; REVIEW ORDER					
	ADDRESSING MOTIONS AND FOLLOW UP RE:					
	SAME					
27274379	10/25/18	FINALIZE ADDITIONAL DISCOVERY	N/A	N/A	1.20 3071	CONNOT, M. J.
	REQUESTS; REVIEW ADTIONAL					
	DISCLOSURES; REVIEW AND REVISE					
	CLAYTON MOTION TO COMPEL					
27286391	10/25/18	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.30 4880	HUNT, A.
	MOTION TO COMPEL CLAYTON RESPONSE					
27286392	10/25/18	REVISED MOTION TO COMPEL	N/A	N/A	4.70 4880	HUNT, A.
27286466	10/25/18	ADDITIONAL RESEARCH REGARDING MOTION	N/A	N/A	2.20 4880	HUNT, A.
	TO COMPEL					
27274744	10/27/18	REVISED MOTION TO COMPEL CLAYTON	N/A	N/A	1.30 4880	HUNT, A.
	RESPONSE.					
27277841	10/29/18	KEVIN RILEY DEPOSITION AND CONTINUED	N/A	N/A	10.50 3071	CONNOT, M. J.
	PREPARATION					
27279769	10/30/18	RILEY AND T JAKSICK DEPOSITIONS;	N/A	N/A	11.00 3071	CONNOT, M. J.
	REVISE MOTION TO COMPEL CLAYTON					
27274754	10/30/18	REVISED MOTION TO COMPEL CLAYTON	N/A	N/A	1.50 4880	HUNT, A.
	RESPONSE.					
27282803	10/31/18	T JAKSICK DEPOSITION; RETURN TO LAS	N/A	N/A	11.00 3071	CONNOT, M. J.
	VEGAS					
27277293	10/31/18	REVIEWED REVISIONS TO MOTION TO	N/A	N/A	.20 4880	HUNT, A.
	COMPEL CLAYTON RESPONSES AND EMAIL					
	TO TEAM REGARDING THE SAME.					
27416017	11/01/18	REVIEW NOTICE OF HASCHEFF DEPO;	N/A	N/A	2.30 3071	CONNOT, M. J.
	REVISE LIMITED OPP TO PETITION FOR					
	RECONVEYANCE; REVIEW T JAKSICK OPP					
	TO MOTION TO COMPEL; FOLLOW UP ON					
	DISCOVERY ISSUES					
27293621	11/01/18	DRAFTED LIMITED OPPOSITION TO	N/A	N/A	2.60 4880	HUNT, A.
	PETITION FOR RECONVEYANCE					
27293756	11/01/18	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.50 4880	HUNT, A.
27293837	11/01/18	REVISED LIMITED OPPOSITION TO	N/A	N/A	1.40 4880	HUNT, A.
	PETITION FOR RECONVEYANCE					
27293838	11/01/18	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.40 4880	HUNT, A.
27419074	11/06/18	REVIEW AND ANALYZE STAN JAKSICK	N/A	N/A	.80 3071	CONNOT, M. J.
	DISCOVERY REQUEST TO TODD JAKSICK					
27419142	11/07/18	REVIEW DEPO TRANSCRIPT OF T JAKSICK;	N/A	N/A	2.90 3071	CONNOT, M. J.
	OUTLINE DISCOVERY ISSUES; TELEPHONE					
	CONFERENCE WITH KEVIN S AND ZACH J					
	RE; [REDACTED]; PREPARE MEMO TO FILE					

-6a5L +-14E +(s015H  
 B/A EMAIL: MConnot@foxrothschild.com  
 R/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY	LAST DATE BILLED	DATE BILLED THRU	FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	LAST DATE BILLED	DATE BILLED THRU	LAST PYMENT DATE
MPRAC	1034				
MNAME	180963.00001				
27376841	11/07/18	REVIEWED MOTION FOR SUMMARY JUDGMENT	N/A	N/A	1.30 4880 HUNT, A.
27376853	11/07/18	AND SUPPORTING DECLARATION	N/A	N/A	.20 4880 HUNT, A.
27376931	11/08/18	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	1.20 4880 HUNT, A.
27376932	11/08/18	RESEARCH REGARDING VERIFICATION OF	N/A	N/A	5.80 4880 HUNT, A.
27339901	11/09/18	COMPLAINT	N/A	N/A	.60 4880 HUNT, A.
27339902	11/09/18	BEGUN DRAFT OPPOSITION TO MOTION FOR	N/A	N/A	.40 4880 HUNT, A.
27340596	11/10/18	SUMMARY JUDGMENT	N/A	N/A	2.00 4880 HUNT, A.
27340597	11/11/18	REVISSED OPPOSITION TO MOTION FOR	N/A	N/A	3.00 4880 HUNT, A.
27420446	11/12/18	SUMMARY JUDGMENT	N/A	N/A	1.40 3071 CONNOT, M. J.
27434273	11/12/18	REVIEW AND REVISE DRAFT OPPOSITION	N/A	N/A	.30 4724 WURST, L.
27340599	11/12/18	TO MOTION FOR SUMMARY JUDGMENT	N/A	N/A	2.20 4880 HUNT, A.
27340600	11/12/18	DISCUSS IDEAS FOR INTERNAL TRANSFER	N/A	N/A	4.90 4880 HUNT, A.
27340601	11/12/18	OF DATA FOR INTERNAL ATTORNEY REVIEW	N/A	N/A	1.30 4880 HUNT, A.
27446660	11/13/18	AND ANALYSIS	N/A	N/A	4.20 3071 CONNOT, M. J.
27381866	11/13/18	CONTINUED REVIEW OF FILE AND	N/A	N/A	.20 4880 HUNT, A.
27381868	11/13/18	MULTIPLE DEPOSITIONS IN CONNECTION	N/A	N/A	.20 4880 HUNT, A.
27381906	11/13/18	WITH OPPOSITION TO KIMMEL MOTION FOR	N/A	N/A	2.00 4880 HUNT, A.
		SUMMARY JUDGMENT	N/A	N/A	
		REVISSED OPPOSITION TO MOTION FOR	N/A	N/A	
		RESEARCH REGARDING OPPOSITION TO	N/A	N/A	
		MOTION FOR SUMMARY JUDGMENT	N/A	N/A	
		REVIEW, REVISE AND FINALIZE	N/A	N/A	
		OPPOSITION TO KIMMEL MSJ; REVIEW,	N/A	N/A	
		REVISE AND FINALIZE REPLY IN SUPPORT	N/A	N/A	
		OF MOTION TO COMPEL; WORK ON	N/A	N/A	
		DISCOVERY ISSUES; UPDATE CHRONOLOGY	N/A	N/A	
		CONFERENCE WITH D. LOFFERDO	N/A	N/A	
		REGARDING	N/A	N/A	
			N/A	N/A	
		REVIEWED CONNOT DECLARATION AND	N/A	N/A	
		EMAIL TO M. CONNOT REGARDING THE	N/A	N/A	
		ADDITIONAL WORK IN CONNECTION WITH	N/A	N/A	



saSl ~s14E ~s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/PTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY					LAST DATE BILLED	FEES and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL					DATE BILLED THRU	
MPRAC 1034						LAST PYMENT DATE	
MYNAME 180963.00001							
27382027	11/15/18	EMAIL TO K. SPENCER AND Z. JOHNSON REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 179,445.50
27377655	11/15/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 179,477.50
27377657	11/15/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 179,509.50
27377658	11/15/18	CONFERENCE WITH D. LOFFREDO [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 179,541.50
27377659	11/15/18	EMAIL TO D. LOFFREDO REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 179,573.50
27366111	11/16/18	REVIEW DISCOVERY ISSUES AND FOLLOW UP ON SAME; TELEPHONE CONFERENCE WITH KEVIN SUTTEHALL RE: [REDACTED]	N/A	N/A	1.50 3071	CONNOT, M. J.	960.00 180,533.50
27356364	11/16/18	PREPARE FOR HEARING TODAY INCLUDING MEETING KEVIN SPENCER AHEAD OF TIME; TRAVEL TO AND FROM COURTHOUSE AND ATTEND HEARING ON MOTION TO EXTEND DISCOVERY/TRIAL	N/A	N/A	5.90 3083	SUTTEHALL, K. M.	2,802.50 183,336.00
27356682	11/16/18	TRAVEL FROM RENO TO LAS VEGAS FOLLOWING HEARING	N/A	N/A	4.10 3083	SUTTEHALL, K. M.	1,947.50 185,283.50
27366102	11/17/18	PIERRE HASCHEFF DEPOSITION	N/A	N/A	10.20 3071	CONNOT, M. J.	6,528.00 191,811.50
27431888	11/19/18	FOLLOW UP ON EMAILS; FOLLOW UP ON DISCOVERY ISSUES; REVIEW T JAKSICK DISCOVERY TO S JAKSICK	N/A	N/A	1.80 3071	CONNOT, M. J.	1,152.00 192,963.50
27378286	11/19/18	CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	N/A	.20 4880	HUNT, A.	64.00 193,027.50
27378289	11/19/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 193,059.50
27378339	11/19/18	REVIEWED PETITION FOR REMOVAL FOR CORRECT CITATIONS TO THE EXHIBITS.	N/A	N/A	5.10 4880	HUNT, A.	1,632.00 194,691.50
27434954	11/20/18	REVIEW DEADLINES AND TASK; TELEPHONE CONFERENCE WITH KEVIN AND ZACH; PREPARE NOTE TO FILE; REVIEW MEDIATORS; FOLLOW UP ON POTENTIAL EXPERTS;	N/A	N/A	2.20 3071	CONNOT, M. J.	1,408.00 196,099.50
27386140	11/20/18	ATTEND PORTION OF CONFERENCE CALL REGARDING [REDACTED]	N/A	N/A	.20 3083	SUTTEHALL, K. M.	95.00 196,194.50
27383017	11/20/18	REVIEWED REDLINE TO PETITION TO REMOVE [REDACTED]	N/A	N/A	.20 4880	HUNT, A.	64.00 196,258.50
27383030	11/20/18	REVIEWED EMAIL FROM D. LOFFREDO REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00 196,290.50
27379106	11/20/18	CASE STRATEGY CONFERENCE CALL WITH [REDACTED]	N/A	N/A	.50 4880	HUNT, A.	160.00 196,450.50

BILLING ATTORNEY: 3071 MARK J. CONNOT

THRU 07/31/19

HUNT, A.	192.00	205,414.00
----------	--------	------------



625L -414E ~{s015H  
B/A EMAIL: Mconnot@foxrothschild.com

B/A EMAIL: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		
MPRAC	1034					LAST PYMENT DATE		
MNAME	180963.00001							
AGREEMENTS.								
27431104	11/29/18	REVIEWED FILE IN CONNECTION WITH	N/A	N/A	1.10	4880	HUNT, A.	352.00 205,766.00
		PALMER SUBPOENA						
27431384	11/29/18	TELEPHONE CONFERENCE WITH D. [REDACTED]	N/A	N/A	.20	4880	HUNT, A.	64.00 205,830.00
		LOFFREDO REGARDING [REDACTED]						
27431407	11/29/18	REVISED CONFLICT LIST AND EMAIL TO	N/A	N/A	.40	4880	HUNT, A.	128.00 205,958.00
		D. LOFFREDO REGARDING THE SAME.						
27440453	11/30/18	EMAILS AND MEMO REGARDING SUBPOENAS;	N/A	N/A	2.00	1554	DODDS, J.A.	680.00 206,638.00
		CREATE ATTACHMENTS 3 AND 4 TO						
		SUBPOENAS; REVISE SERVICE LIST;						
		REVISE CA SUBPOENA AND NOTICE TO						
		CONSUMER; REVIEW RULES REGARDING						
		NOTICES TO THREE INDIVIDUALS ON ONE						
		NOTICE.						
27438712	11/30/18	REVIEW AND REVISE SUBPOENAS	N/A	N/A	.10	1828	GALLEGOS, Y. M.	52.00 206,690.00
27445453	11/30/18	WORK ON EXPERT AND DISCOVERY ISSUES;	N/A	N/A	1.30	3071	CONNOT, M. J.	832.00 207,522.00
		UPDATE TASK LIST BASED ON NEW						
		DEADLINES						
27434398	11/30/18	TELEPHONE CONFERENCE WITH S. PARKE	N/A	N/A	.20	4880	HUNT, A.	64.00 207,586.00
		REGARDING TRIAL PROTOCOL STATEMENT						
		DEADLINE AND EMAIL TO TEAM REGARDING						
		THE SAME.						
27434465	11/30/18	TELEPHONE CONFERENCE WITH M. CONNOT	N/A	N/A	.10	4880	HUNT, A.	32.00 207,618.00
		REGARDING [REDACTED]						
27434860	11/30/18	EMAIL TO OPPOSING COUNSELS REGARDING	N/A	N/A	.10	4880	HUNT, A.	32.00 207,650.00
		TRIAL PROTOCOL STATEMENT DEADLINE						
27489632	12/03/18	REVISE NOTICE TO CONSUMER, NEVADA	N/A	N/A	1.30	1554	DODDS, J.A.	442.00 208,092.00
		SUBPOENA, CA SUBPOENA AND PROOF OF						
		SERVICE, EMAIL SAME TO ZACK FOR						
		APPROVAL.						
27563630	12/03/18	REVIEW T JAKSICK DISCOVERY RESPONSES	N/A	N/A	1.10	3071	CONNOT, M. J.	704.00 208,796.00
		TO S JAKSICK REQUEST; REVIEW AND						
		REVISE PALMER SUBPOENA						
27456195	12/03/18	REVISED PALMER SUBPOENA	N/A	N/A	1.50	4880	HUNT, A.	480.00 209,276.00
27456198	12/03/18	EMAIL TO M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10	4880	HUNT, A.	32.00 209,308.00
		[REDACTED]						
27489748	12/04/18	RECEIVE AND REVIEW ZACK'S EMAIL AND	N/A	N/A	2.00	1554	DODDS, J.A.	680.00 209,988.00
		EDITS TO SUBPOENAS, REVISE DOCUMENTS						
		ACCORDINGLY; PREPARE TWO ADDITIONAL						
		SUBPOENAS AND RELATED DOCUMENTS;						
		REVISE ATTORNEY ADDRESS; FINALIZE						
		DOCUMENTS; EMAILS REGARDING						
		SUBPOENAS.						
27563840	12/04/18	REVIEW T JAKSICK, INDIVIDUALLY, AND	N/A	N/A	2.10	3071	CONNOT, M. J.	1,344.00 211,332.00
		AS BENEFICIARY, RESPONSE AND						

625L 14E ~{s015H  
B/A EMAIL: MConnot@foxrothschild.com  
B/A EMAIL:  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		
MPRAC	1034					LAST PYMENT DATE		
MYNAME	180963.00001							
OBJECTION TO S JAKSICK'S AMENDED OBJECTION AND COUNTER-PETITION RE ISSUE TRUST, T JAKSICK, INDIVIDUALLY, AND AS BENEFICIARY, RESPONSE AND OBJECTION TO S JAKSICK'S AMENDED OBJECTION AND COUNTER-PETITION RE FAMILY TRUST, AND J CLAYTON OPPOSITION TO W JAKSICK'S MOTION TO COMPEL; FINALIZE RILEY NOD; REVIEW CORRECTIVE DEEDS; REVIEW MUAPIN COX MTC; FOLLOW UP ON DISCOVERY ISSUES								
27456552	12/04/18	PRELIMINARY REVIEW OF OBJECTION TO MOTION TO COMPEL CLAYTON RESPONSES. CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.40 4880	HUNT, A.	128.00	211,460.00
27456577	12/04/18	CONFERENCE WITH M. CONNOT REGARDING CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.50 4880	HUNT, A.	160.00	211,620.00
27456672	12/04/18	CONFERENCE WITH M. CONNOT BEGIN OUTLINE REGARDING REPLY IN SUPPORT OF CLAYTON SUBPOENA	N/A	N/A	.60 4880	HUNT, A.	192.00	211,812.00
27591861	12/04/18	REVIS DATE ON ALL SUBPOENAS AND NOTICES, FINALIZE NOTICES AND SUBPOENAS AND PREPARE FOR SERVICE, SERVE ALL.	N/A	N/A	1.00 4880	HUNT, A.	320.00	212,132.00
27490372	12/05/18	REVISE PALMER SUBPOENA REVISE PALMER SUBPOENA FVAMTATE EMAIL FROM ZACH RE: [REDACTED]	N/A	N/A	.90 1554	DODDS, J.A.	306.00	212,438.00
27564317	12/05/18	REVISE CLAYTON SUBPOENA; PREPARE NOTICE OF DEPOSITION; REVISE BOA SUBPOENA; REVIEW STATUTE OF LIMITATIONS RE: FRAUDULENT CONCEALMENT AND RESEARCH SAME; REVISE PALMER SUBPOENA FVAMTATE EMAIL FROM ZACH RE: [REDACTED]	N/A	N/A	2.30 3071	CONNOT, M. J.	1,472.00	213,910.00
27462789	12/05/18	FURTHER REVISIONS TO THE N. PALMER SUBPOENA AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.20 3083	SUTEHALL, K. M.	95.00	214,005.00
27574898	12/05/18	EMAILS REGARDING SUBPOENAS, UPDATE FILE WITH NOTICES.	N/A	N/A	1.60 4880	HUNT, A.	512.00	214,517.00
27490377	12/06/18	DISMISS; REVISE TITOR TITLE SUBPOENA; REVIEW MOTION FOR SUMMARY JUDGMENT; TELEPHONE CONFERENCE WITH GEORGE SWARTS; TELEPHONE CONFERENCE WITH FRANK CAMPAGNA; FINALIZE MUAPIN COX MTC; REVIEW OPPOSITION TO MOTION; REVIEW AND REVISE DRAFT	N/A	N/A	.20 1554	DODDS, J.A.	68.00	214,585.00
27564436	12/06/18		N/A	N/A	2.70 3071	CONNOT, M. J.	1,728.00	216,313.00

\*a5L \*i14E \*(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		
MPRAC	1034					LAST PYMENT DATE		
MNAME	180963.00001							
DISCOVERY CONFERENCE STATEMENT; FINALIZE CHILDERS MTC; REVIEW EMAIL FROM DISCOVERY COMM'R OFFICE; REVIEW ORDER APPOINTING MEDIATOR AND EXCHANGE EMAILS RE: SAME								
27591995	12/06/18	CASE STRATEGY CONFERENCE WITH M. CONNOT AND D. LOFFREDO	N/A	N/A	1.50	4880	HUNT, A.	480.00 216,793.00
27591996	12/06/18	CONFERENCE WITH J. DOFFREDO REGARDING [REDACTED]	N/A	N/A	.20	4880	HUNT, A.	64.00 216,857.00
27490380	12/07/18	EMAILS REGARDING SERVICE OF SUBPOENAS.	N/A	N/A	.10	1554	DODDS, J.A.	34.00 216,891.00
27580710	12/07/18	MEET WITH EXPERT; REVISE DISCOVERY CONF REPORT; REVIEW TODD JAKSTICK REPORT; OUTLINE ADDITIONAL DISCOVERY ISSUES;	N/A	N/A	3.30	3071	CONNOT, M. J.	2,112.00 219,003.00
27492876	12/07/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10	4880	HUNT, A.	32.00 219,035.00
27492878	12/07/18	REVIEWED RILEY DEPOSITION AND EMAILS TO M. CONNOT REGARDING THE SAME.	N/A	N/A	1.30	4880	HUNT, A.	416.00 219,451.00
27492997	12/07/18	TELEPHONE CONFERENCE WITH K M CASTILLO REGARDING [REDACTED]	N/A	N/A	.10	4880	HUNT, A.	32.00 219,483.00
27581217	12/10/18	FOLLOW UP ON MEDIATION DATES; REVISE REPLY IN SUPPORT OF MOTION TO COMPEL CLAYTON RESPONSE; FOLLOW UP ON HANDWRITING EXPERT ISSUES AND REVIEW EMAIL FROM ZACH JOHNSON RE: SAME; FOLLOW UP ON CLAYTON SUBPOENA AND ACCEPTANCE OF SERVICE; FOLLOW UP ON DISCOVERY ISSUES; OUTLINE TRIAL ISSUES	N/A	N/A	3.10	3071	CONNOT, M. J.	1,984.00 221,467.00
27526598	12/10/18	EVALUATE EMAILS CONCERNING [REDACTED] AND CONFER BRIEFING WITH CONNOT RE:	N/A	N/A	1.70	3083	SUTEHALL, K. M.	807.50 222,274.50
27493213	12/10/18	DRAFTED REPLY IN SUPPORT OF MOTION TO COMPEL CLAYTON RESPONSES	N/A	N/A	2.60	4880	HUNT, A.	832.00 223,106.50
27592088	12/10/18	CONFERENCE WITH M. CONNOT REGARDING OBJECTION TO CLAYTON SUBPOENA	N/A	N/A	.20	4880	HUNT, A.	64.00 223,170.50
27592101	12/10/18	CONFERENCE WITH W. FEINER REGARDING TRIAL NEEDS.	N/A	N/A	.30	4880	HUNT, A.	96.00 223,266.50
27592102	12/10/18	RESEARCH REGARDING VIOLATIONS OF NRS 140.120	N/A	N/A	.60	4880	HUNT, A.	192.00 223,458.50
27592103	12/10/18	FURTHER REVISIONS TO REPLY TO MOTION TO COMPEL CLAYTON RESPONSES	N/A	N/A	1.90	4880	HUNT, A.	608.00 224,066.50
27528515	12/11/18	TELEPHONE CONFERENCE WITH DISCOVERY	N/A	N/A	1.30	3071	CONNOT, M. J.	832.00 224,898.50





\*a5L \*414E \*(s015H  
B/A EMAIL: MConnot@foxrothschild.com  
B/A EMAIL:  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		
MPRAC	1034					LAST PYMENT DATE		
MYNAME	180963.00001							
27592484	12/17/18	AND BRIEFLY RESEARCH ETHICAL RULE CONCERNING SAME	N/A	N/A	.10 4880	HUNT, A.	32.00	249,054.50
27592485	12/17/18	REGARDING [REDACTED] TELEPHONE CONFERENCE WITH M. CONNOT	N/A	N/A	.10 4880	HUNT, A.	32.00	249,086.50
27592500	12/17/18	LOFFREDO REGARDING [REDACTED] REVISED REPLY IN SUPPORT OF PETITION	N/A	N/A	1.60 4880	HUNT, A.	512.00	249,598.50
27592520	12/17/18	TO REMOVE CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	N/A	.50 4880	HUNT, A.	160.00	249,758.50
27592523	12/17/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.70 4880	HUNT, A.	224.00	249,982.50
27592524	12/17/18	REVISED REPLY IN SUPPORT OF MOTION FOR LEAVE TO JOIN INDISPENSABLE PARTIES.	N/A	N/A	1.60 4880	HUNT, A.	512.00	250,494.50
27592530	12/17/18	CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	N/A	.20 4880	HUNT, A.	64.00	250,558.50
27592531	12/17/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	32.00	250,590.50
27592532	12/17/18	FINALIZE W. JAKSICK'S EXPERT DISCLOSURE AND AMENDED EXPERT DISCLOSURE	N/A	N/A	1.40 4880	HUNT, A.	448.00	251,038.50
27592536	12/17/18	RESEARCH REGARDING NRCP 16.1 AND NON RETAINED EXPERT DISCLOSURES, EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.90 4880	HUNT, A.	288.00	251,326.50
27548116	12/18/18	REVIEW SUBPOENA PRIOR TO SERVICE, ARRANGE FOR SERVICE OF SAME, UPDATE FILE.	N/A	N/A	.40 1554	DODDS, J.A.	136.00	251,462.50
27528509	12/18/18	TELEPHONE CONFERENCE WITH DISCOVERY COMMISSIONER	N/A	N/A	1.20 3071	CONNOT, M. J.	768.00	252,230.50
27581716	12/18/18	FOLLOW UP ON CLAYTON SERVICE; OUTLINE ISSUES FOR DISCOVERY COMMISSIONER CALL; TELEPHONE CONFERENCE WITH TEAM; REVIEW NON RETAINED EXPERT ISSUES; REVIEW LAKE TAHOE MSJ ISSUES; REVIEW MAUPIN COX SECOND SUPPLEMENT;	N/A	N/A	2.90 3071	CONNOT, M. J.	1,856.00	254,086.50
27527639	12/18/18	CASE STRATEGY CONFERENCE WITH M. CONNOT AND Z. JOHNSON	N/A	N/A	.80 4880	HUNT, A.	256.00	254,342.50
27528184	12/18/18	ATTENDED DISCOVERY CONFERENCE	N/A	N/A	1.00 4880	HUNT, A.	320.00	254,662.50
27528294	12/18/18	CASE STRATEGY CONFERENCE WITH M. CONNOT REGARDING OUTSTANDING DISCOVERY REQUESTS	N/A	N/A	.10 4880	HUNT, A.	32.00	254,694.50
27592670	12/18/18	REVIEW EXPERT DISCLOSURES	N/A	N/A	1.10 4880	HUNT, A.	352.00	255,046.50

\*\*\*\*\*  
 B/A EMAIL: MConnot@foxrothschild.com  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

\*\*\*\*\*  
 FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	
		LAST PYMENT DATE	
MPRAC 1034			
MNAME 180963.00001			
27551476 12/19/18	REVIEW OPPOSITION TO MOTION TO DISMISS; ANALYZE STATUTE OF LIMITATION ISSUES	1.90 3071 CONNOT, M. J.	1,216.00 256,262.50
27581760 12/19/18	TELEPHONE CONFERENCE WITH FRANK CAMPAGNA; FINALIZE TIGOR SUBPOENA; REVIEW STAN OPPOSITION TO TODD'S MSJ RE: TAHOE; REVIEW DISCOVERY COMMISSIONER ORDER RE: RILEY DEPOSITION; REVIEW EMAIL FORM KENT ROBISON RE: CLAYTON DEPOSITION; REVIEW TODD'S OBJECTION TO SUBMISSIONS REVIEW TODD'S JOINER RE: RILEY DEPOSITION; REVIEW TODD'S DEPO NOTICES; REVIEW STAN'S EXPERT DISCLOSURES; TRIAL PREPARATION REVIEW EMAILS CONFIRMING SERVICE OF SUBPOENAS, UPDATE FILE AND EMAIL TEAM REGARDING SAME.	3.40 3071 CONNOT, M. J.	2,176.00 258,438.50
27548157 12/20/18	REVIEW MOTION TO STRIKE; WORK ON BRIEFING ISSUES; REVIEW DISCOVERY ISSUES; OUTLINE STRATEGY; UPDATE TASK LIST; TELEPHONE CONFERENCE WITH TEAM	.10 1554 DODDS, J.A.	34.00 258,472.50
27581808 12/20/18	REVIEWED REQUESTS FOR PRODUCTION IN CONNECTION WITH MEET AND CONFER LETTER TO T. JAKSICK	1.70 3071 CONNOT, M. J.	1,088.00 259,560.50
27551475 12/20/18	OUTLINE ISSUES FOR DISCOVERY STATUS REPORT	.80 3071 CONNOT, M. J.	512.00 260,072.50
27592963 12/20/18	REVIEWED REQUESTS FOR PRODUCTION IN CONNECTION WITH MEET AND CONFER LETTER TO T. JAKSICK	1.20 4880 HUNT, A.	384.00 260,456.50
27581901 12/21/18	REVIEW AND REVISE TAHOE MSJ OPPOSITION; REVIEW MAUPIN COX THIRD SUPPLEMENT; REVIEW RILEY SUPPLEMENT TO DESIGNATION; WORK ON DISCOVERY AND TRIAL ISSUES	2.30 3071 CONNOT, M. J.	1,472.00 261,928.50
27561546 12/21/18	TELEPHONE CONFERENCE WITH Z. JOHNSON REGARDING [REDACTED]	.20 4880 HUNT, A.	64.00 261,992.50
27593036 12/21/18	OUTLINE AND BEGUN DRAFT OF OPPOSITION TO MOTION TO DISMISS	3.80 4880 HUNT, A.	1,216.00 263,208.50
27593132 12/21/18	EMAIL TO K. ROBINSON AND D. LATTIN REGARDING DISCOVERY	.20 4880 HUNT, A.	64.00 263,272.50
27594791 12/21/18	RESEARCH REGARDING OPPOSITION TO MOTION TO DISMISS	1.70 4880 HUNT, A.	544.00 263,816.50
27561585 12/22/18	REVISE OPPOSITION TO MOTION TO DISMISS	1.60 4880 HUNT, A.	512.00 264,328.50
27561630 12/23/18	RESEARCH REGARDING NRCP 12(F) AND REVISE OPPOSITION TO MOTION TO	1.90 4880 HUNT, A.	608.00 264,936.50





-sa5L -s14E -(s015H  
B/A EMAIL: MConnot@foxrothschild.com

B/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER	TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	LAST PYMENT DATE
MPRAC 1034			
MNAME 180963.00001			
27593584 12/27/18	REVISE TRIAL PROTOCOL STATEMENT	N/A N/A	1,184.00 276,648.50
27593593 12/27/18	CASE STRATEGY CONFERENCES WITH M. CONNOT	N/A N/A	224.00 276,872.50
27593655 12/27/18	PRELIMINARY REVIEW OF MEDIATOR STATEMENT	N/A N/A	96.00 276,968.50
27564511 12/27/18	REVISE TRIAL PROTOCOL STATEMENT AND EMAIL TO TEAM REGARDING THE SAME.	N/A N/A	96.00 277,064.50
27591525 12/28/18	REVISE MEDIATION STATEMENT; REVISE TRIAL PROTOCOL STATEMENT ; CONFERENCE WITH TEAM; REVIEW DEPOSITION ISSUES; PREPARE DEPOSITION NOTICES; REVIEW RILEY DESIGNATION OF REBUTTAL EXPERT REVIEW AND REVISE MEDIATION STATEMENT, EMAIL TO Z. JOHNSON REGARDING THE SAME	N/A N/A	2,752.00 279,816.50
27593736 12/28/18	CONFERENCE WITH D. LOFFERDO REGARDING [REDACTED]	N/A N/A	416.00 280,232.50
27593738 12/28/18	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A	64.00 280,296.50
27593739 12/28/18	CONFERENCE WITH TEAM REGARDING [REDACTED]	N/A N/A	32.00 280,328.50
27593797 12/28/18	CONFERENCE WITH TEAM REGARDING [REDACTED]	N/A N/A	448.00 280,776.50
27593832 12/28/18	REVISE TRIAL PROTOCOL STATEMENT	N/A N/A	320.00 281,096.50
27593833 12/28/18	CASE STRATEGY CONFERENCES WITH M. CONNOT	N/A N/A	96.00 281,192.50
27593837 12/28/18	CONFERENCE WITH D. LOFFERDO REGARDING [REDACTED]	N/A N/A	32.00 281,224.50
27582080 12/30/18	RESEARCH REGARDING LOCATION OF EXPERT DEPOSITION AND DISCLOSURE OF NON-RETAINED EXPERT	N/A N/A	576.00 281,800.50
27611694 12/31/18	FOLLOW UP ON DISCOVERY AND MEDIATION ISSUES; REVIEW STAN TRIAL STATEMENT; FOLLOW UP ON PALMER SUBPOENA; REVIEW EXPERT DISCLOSURES FROM TODD; REVIEW LETTER TO ROBISON; REVIEW EXPERT DISCLOSURE ISSUES AND SCOPE AND REQUIREMENTS OF NON RETAINED EXPERTS	N/A N/A	2,176.00 283,976.50
27594040 12/31/18	ADDITIONAL RESEARCH REGARDING NON-RETAINED EXPERTS	N/A N/A	416.00 284,392.50
27594041 12/31/18	ADDITIONAL RESEARCH REGARDING LOCATION OF DEPOSITION	N/A N/A	224.00 284,616.50
27594042 12/31/18	CASE STRATEGY CONFERENCE WITH M.	N/A N/A	192.00 284,808.50

(RUN 05/12/20 11:44 )  
THRU 07/31/19

TJA 003247

\*a5L \*l4E \*(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEES and DISB
CLIENT 180963 JAKSICK, WENDY		
MATTER 180963.00001 ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL		
MPRAC 1034		
MNAME 180963.00001		
27660491 01/07/19 COMPEL CHILDERS RESPONSE		
CASE STRATEGY CONFERENCES WITH M. CONNOT	N/A N/A .60 4880 HUNT, A.	192.00 325,363.50
27660492 01/07/19 CASE STRATEGY CONFERENCES WITH Z. JOHNSON	N/A N/A .40 4880 HUNT, A.	128.00 325,491.50
27660493 01/07/19 DRAFT AND REVISE PRE-TRIAL DISCLOSURES	N/A N/A 3.00 4880 HUNT, A.	960.00 326,451.50
27660520 01/07/19 FURTHER REVISE, FINALIZE AND FILE PRE-TRIAL DISCLOSURES	N/A N/A 1.10 4880 HUNT, A.	352.00 326,803.50
27660521 01/07/19 EMAIL OPPOSING PARTIES THE DOCUMENTS PROVIDED BY BANK OF AMERICA IN RESPONSE TO SUBPOENA	N/A N/A .10 4880 HUNT, A.	32.00 326,835.50
27689451 01/08/19 PREPARE FOR AND ATTEND DISCOVERY STATUS CONFERENCE	N/A N/A 2.30 3071 CONNOT, M. J.	1,472.00 328,307.50
27712221 01/08/19 REVIEW AND RESEARCH 30(B) (6) ISSUES; REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL RE: SAME AND DO FOLLOW UP RESEARCH; FOLLOW UP WITH EXPERT RE: AVAILABILITY AND DEPOSITION DATES; TRIAL PREPARATION	N/A N/A 2.40 3071 CONNOT, M. J.	1,536.00 329,843.50
27660951 01/08/19 CONFERENCE WITH D. LOFFREDO REGARDING DEADLINES	N/A N/A .50 4880 HUNT, A.	160.00 330,003.50
27660953 01/08/19 REVISE TASK LIST WITH TRIAL DEADLINES AND PROPOSED DRAFT DEADLINES AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A N/A 1.50 4880 HUNT, A.	480.00 330,483.50
27660954 01/08/19 CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A N/A .40 4880 HUNT, A.	128.00 330,611.50
27660956 01/08/19 CONFERENCE WITH Z. JOHNSON REGARDING [REDACTED] AND EMAIL TO Z. JOHNSON REGARDING THE SAME.	N/A N/A .60 4880 HUNT, A.	192.00 330,803.50
27660996 01/08/19 CASE STRATEGY CONFERENCE WITH M. CONNOT; CONFERENCE CALL WITH Z. JOHNSON AND K. SPENCER	N/A N/A 1.40 4880 HUNT, A.	448.00 331,251.50
27661047 01/08/19 UPDATE TASK LIST TO INCLUDE NOTES AND ADDITIONAL TASKS NECESSITATED BY DISCOVERY CONFERENCE	N/A N/A .50 4880 HUNT, A.	160.00 331,411.50
27644999 01/08/19 ATTEND DISCOVERY CONFERENCE	N/A N/A 1.40 4880 HUNT, A.	448.00 331,859.50
27712607 01/09/19 WORK WITH EXPERTS RE: TRAVEL EXPENSES; EXCHANGE EMAILS WITH OPPOSING COUNSEL RE: SAME; FOLLOW UP WITH FRANK CAMPAGNA RE: TESTIMONY; REVIEW AND REVISE UPDATED TASK LIST; REVIEW 30(B) (6) ISSUES; FOLLOW UP ON NICK PALMER OBJECTIONS; REVIEW ERRATA TO EXPERT DESIGNATION; REVIEW	N/A N/A 5.20 3071 CONNOT, M. J.	3,328.00 335,187.50





\*\*\*\*\*  
 -6a5L -614E -(s015H  
 B/A EMAIL: MConnot@foxrothschild.com  
 B/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	LAST PYMENT DATE
MPRAC	1034		
27671069	01/11/19	3.60 4880 HUNT, A.	1,152.00 353,488.50
27671455	01/11/19	.10 4880 HUNT, A.	32.00 353,520.50
27671894	01/11/19	.40 4880 HUNT, A.	128.00 353,648.50
27671910	01/11/19	.70 4880 HUNT, A.	224.00 353,872.50
27671952	01/11/19	.10 4880 HUNT, A.	32.00 353,904.50
27671956	01/11/19	.10 4880 HUNT, A.	32.00 353,936.50
27672018	01/11/19	.10 4880 HUNT, A.	32.00 353,968.50
27672019	01/11/19	.10 4880 HUNT, A.	32.00 354,000.50
27672020	01/11/19	.20 4880 HUNT, A.	64.00 354,064.50
27672021	01/11/19	.60 4880 HUNT, A.	192.00 354,256.50
27672036	01/11/19	1.00 4880 HUNT, A.	320.00 354,576.50
27689340	01/12/19	.80 1940 CHLUM, P. M.	236.00 354,812.50
27722539	01/12/19	2.20 3071 CONNOT, M. J.	1,408.00 356,220.50
27722542	01/13/19	3.50 3071 CONNOT, M. J.	2,240.00 358,460.50
27672849	01/13/19	2.00 4880 HUNT, A.	640.00 359,100.50
27689339	01/14/19	6.10 1940 CHLUM, P. M.	1,799.50 360,900.00
27722633	01/14/19	7.20 3071 CONNOT, M. J.	4,608.00 365,508.00

\*a5L +-14E +(s015H  
 B/A EMAIL: MConnot@foxrothschild.com  
 R/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY	N/A	N/A	.20 4836	KIRK, T.S.	75.00	365,583.00
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	N/A	N/A	.70 4836	KIRK, T.S.	262.50	365,845.50
MPRAC	1034		N/A	N/A	.90 4836	KIRK, T.S.	337.50	366,183.00
MNAME	180963.00001		N/A	N/A	.30 4880	HUNT, A.	96.00	366,279.00
27685894	01/14/19	STRATEGIZE WITH A. HUNT REGARDING	N/A	N/A	.20 4880	HUNT, A.	64.00	366,343.00
27686173	01/14/19	RESEARCH REQUIREMENT OF SIGNATURE IN NOTARY JOURNAL WHEN SIGNER IS KNOWN TO NOTARY.	N/A	N/A	.10 4880	HUNT, A.	32.00	366,375.00
27686229	01/14/19	RESEARCH WHETHER NOTARY MUST CHANGE JURAT WHEN SIGNER APPEARS AS POWER OF ATTORNEY.	N/A	N/A	.20 4880	HUNT, A.	64.00	366,439.00
27679940	01/14/19	CONFERENCES WITH M. CONNOT REGARDING	N/A	N/A	1.10 4880	HUNT, A.	352.00	366,791.00
27679941	01/14/19	CONFERENCES WITH Z. JOHNSON REGARDING	N/A	N/A	.10 4880	HUNT, A.	32.00	366,823.00
27679942	01/14/19	FOLLOW UP EMAIL TO N. PALMER REGARDING MEET AND CONFER	N/A	N/A	.10 4880	HUNT, A.	32.00	366,855.00
27680101	01/14/19	REVIEWED S. JAKSICK'S DISCOVERY STATUS REPORT	N/A	N/A	.10 4880	HUNT, A.	32.00	366,887.00
27680191	01/14/19	REVISE TASK LIST; EMAIL TO M. CONNOT REGARDING THE SAME	N/A	N/A	.30 4880	HUNT, A.	96.00	366,983.00
27680264	01/14/19	TELEPHONE CONFERENCE WITH D. LOFREDO REGARDING	N/A	N/A	.20 4880	HUNT, A.	64.00	367,047.00
27680391	01/14/19	TELEPHONE CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.80 4880	HUNT, A.	256.00	367,303.00
27680401	01/14/19	REVIEW AND RESPONDED TO EMAIL FROM Z. JOHNSON REGARDING	N/A	N/A	.20 4880	HUNT, A.	64.00	367,367.00
27680478	01/14/19	TELEPHONE CONFERENCE WITH S. WILLIAMS REGARDING BOFA SUBPOENA; EMAIL TO TEAM REGARDING THE SAME	N/A	N/A	.80 4880	HUNT, A.	256.00	367,623.00
27680961	01/14/19	TELEPHONE CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.40 4880	HUNT, A.	128.00	367,751.00
27681053	01/14/19	REVIEW MOTION IN LIMINE REGARDING EXPERT WITNESS FILED BY PETITIONERS	N/A	N/A	.20 4880	HUNT, A.	64.00	367,815.00
27681070	01/14/19	EMAIL TO TEAM REGARDING , REVIEW AND RESPOND TO EMAIL FROM K. SPENCER REGARDING THE SAME.	N/A	N/A				
27681513	01/14/19	DRAFT MOTION TO EXCLUDE EXPERT TESTIMONY	N/A	N/A				
27681516	01/14/19	CASE STRATEGY CONFERENCE WITH D. LOFREDO	N/A	N/A				
27681520	01/14/19	TELEPHONE CONFERENCE WITH AND EMAIL TO T. KIRK REGARDING	N/A	N/A				
27689333	01/15/19	PREPARE WENDY JAKSICK'S SECOND SUPPLEMENTAL DISCLOSURE OF DOCUMENTS	N/A	N/A	6.00 1940	CHLUM, P. M.	1,770.00	369,585.00

R/A EMAIL: R/COMMUNICATOCENTERS.COM

B/ATTY LOC: 71 LAS VEGAS

0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
A  
B  
C  
D  
E  
F  
G  
H  
I  
J  
K  
L  
M  
N  
O  
P  
Q  
R  
S  
T  
U  
V  
W  
X  
Y  
Z

(RUN 05/12/20 11:44 )  
THRU 07/31/19

LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEES and DISB
CONNOT, M. J.	5,504.00 375,089.00
KIRK, T.S.	412.50 375,501.50
KIRK, T.S.	375.00 375,876.50
HUNT, A.	224.00 376,100.50
HUNT, A.	96.00 376,196.50
HUNT, A.	64.00 376,260.50
HUNT, A.	224.00 376,484.50
HUNT, A.	128.00 376,612.50
HUNT, A.	32.00 376,644.50
HUNT, A.	96.00 376,740.50
HUNT, A.	288.00 377,028.50
HUNT, A.	128.00 377,156.50
HUNT, A.	288.00 377,444.50
HUNT, A.	384.00 377,828.50
HUNT, A.	128.00 377,956.50
HUNT, A.	96.00 378,052.50



R/A EMAIL:   
 B/ATTY LOC: 71 LAS VEGAS   
 BILLING ATTORNEY: 3071 MARK J. CONNOT   
 FOX ROTHSCHILD LLP   
 DETAILLED BILLING REPORT   
 PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	JAKSICK, WENDY ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL						LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEEES and DISB
180963								
WATTER 180963.00001								
MPRAC 1034								
NAME 180963.00001								
27688238	01/15/19	REVIEWED PRE-TRIAL DISCLOSURES FILED BY PETITIONERS	N/A	N/A	.20	4880 HUNT, A.	64.00	378,116.50
27724039	01/16/19	PREPARING WENDY JAKSICK SECOND SUPPLEMENTAL DISCLOSURES	N/A	N/A	2.50	1940 CHLUM, P. M.	737.50	378,854.00
27724068	01/16/19	PREPARING WENDY JAKSICK THIRD SUPPLEMENTAL DISCLOSURES	N/A	N/A	3.60	1940 CHLUM, P. M.	1,062.00	379,916.00
27724030	01/16/19	REVIEW ISSUES FOR STOLBACH DEPOSITION AND REVIEW REPORT; TELEPHONE CONFERENCE WITH GARY STOLBACH AND ZACH JOHNSON RE: DEPOSITION PREP; REVIEW NICK PALMER ISSUES; REVIEW TODD'S DISCOVERY RESPONSES; REVIEW RESEARCH RE: NOTARIES; REVIEW ORDER RE; INDISPENSABLE PARTIES; REVIEW NOTICE OF WITHDRAWAL OF EXPERT OR PERCIPIENT WITNESSES; TRIAL PREP PREPARE JURY INSTRUCTIONS NECESSARY FOR TRIAL; CONFER WITH A HUNT AND K SUTCHALL REGARDING THE SAME	N/A	N/A	3.70	4620 REYES, L.	1,128.50	383,732.50
27695810	01/16/19	SUMMARIZE RESEARCH ON NOTARY DUTIES AND SPOILIATION UNDER NEVADA LAW. DRAFT DISCOVERY REPORT CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	N/A	.80	4836 KIRK, T.S.	300.00	384,032.50
27695871	01/16/19	TELEPHONE CALL TO S. WILLIAMS REGARDING BANK OF AMERICA RESPONSE	N/A	N/A	1.20	4880 HUNT, A.	384.00	384,416.50
27695936	01/16/19	CASE STRATEGY CONFERENCE WITH TRIAL TEAM	N/A	N/A	.20	4880 HUNT, A.	64.00	384,480.50
27694567	01/16/19	CASE STRATEGY CONFERENCE WITH D. IOFFREDO	N/A	N/A	.10	4880 HUNT, A.	32.00	384,512.50
27695188	01/16/19	CASE STRATEGY CONFERENCE WITH TRIAL TEAM	N/A	N/A	.80	4880 HUNT, A.	256.00	384,768.50
27695630	01/16/19	CASE STRATEGY CONFERENCE WITH D. IOFFREDO	N/A	N/A	.60	4880 HUNT, A.	192.00	384,960.50
27695745	01/16/19	CONFERENCE WITH W. FEINER REGARDING TRIAL	N/A	N/A	.30	4880 HUNT, A.	96.00	385,056.50
27695746	01/16/19	REVISE WITNESS LIST	N/A	N/A	1.10	4880 HUNT, A.	352.00	385,408.50
27695747	01/16/19	CONFERENCES WITH L. REYES REGARDING JURY INSTRUCTIONS	N/A	N/A	.30	4880 HUNT, A.	96.00	385,504.50
27695750	01/16/19	REVIEW S. JAKSICK PRE-TRIAL DISCLOSURES	N/A	N/A	.30	4880 HUNT, A.	96.00	385,600.50
27695751	01/16/19	DISCLOSE REVIEW COURT'S ORDER GRANTING IN PART AND DENYING IN PART MOTION TO JOIN INDISPENSABLE PARTIES	N/A	N/A	.60	4880 HUNT, A.	192.00	385,792.50
27695752	01/16/19	REVIEW EMAIL FROM K. SPENCER REGARDING [REDACTED] AND ADDITIONAL RESEARCH REGARDING THE SAME	N/A	N/A	.60	4880 HUNT, A.	192.00	385,984.50

ta5L -414E +(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MAUTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		
						LAST PYMENT DATE		
MPRAC	1034							
MNAME	180963.00001							
27695774	01/16/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.20	4880	HUNT, A.	64.00 386,048.50
27724037	01/17/19	PREPARING WENDY JAKSICK THIRD	N/A	N/A	2.20	1940	CHLUM, P. M.	649.00 386,697.50
		SUPPLEMENTAL DISCLOSURES						
27724070	01/17/19	MEET WITH GARY STOLBACH RE: DEPO	N/A	N/A	8.80	3071	CONNOT, M. J.	5,632.00 392,329.50
		PREP; ATTEND STOLBACH DEPOSITION;						
		REVIEW CLAYTON RESPONSE TO SUBPOENA;						
		REVIEW DRAFT DISCOVERY REPORT;						
		REVIEW EMAIL RE: CHRISMAN DEPO;						
		REVIEW DISCOVERY CONFERENCE MINUTES;						
		REVIEW MOTION TO COMPEL SUBTRUST						
		ACCOUNTINGS; RETURN TRAVEL TO LAS						
		VEGAS						
27700831	01/17/19	TELEPHONE CONFERENCE WITH D	N/A	N/A	.30	4880	HUNT, A.	96.00 392,425.50
		LOFFREDO REGARDING						
27700935	01/17/19	TELEPHONE CALL TO S. WILLIAMS FROM	N/A	N/A	.10	4880	HUNT, A.	32.00 392,457.50
		BANK OF AMERICA REGARDING SUBPOENA'D						
		DOCUMENTS						
27700990	01/17/19	CASE STRATEGY CONFERENCES WITH M.	N/A	N/A	.10	4880	HUNT, A.	32.00 392,489.50
		CONNOT						
27700995	01/17/19	REVISE AND CIRCULATE DISCOVERY REPORT	N/A	N/A	2.10	4880	HUNT, A.	672.00 393,161.50
27701528	01/17/19	CASE STRATEGY CONFERENCE WITH Z.	N/A	N/A	.40	4880	HUNT, A.	128.00 393,289.50
		JOHNSON						
27701747	01/17/19	REVIEW T. JAKSICK'S PROPOSED JURY	N/A	N/A	.40	4880	HUNT, A.	128.00 393,417.50
		INSTRUCTIONS						
27701748	01/17/19	REVIEW AND ANALYZE NEVADA JURY	N/A	N/A	3.20	4880	HUNT, A.	1,024.00 394,441.50
		INSTRUCTIONS						
27701749	01/17/19	CREATE CAUSE OF ACTION AND JURY	N/A	N/A	.90	4880	HUNT, A.	288.00 394,729.50
		INSTRUCTION CHART						
27701751	01/17/19	EMAIL TO Z. JOHNSON REGARDING	N/A	N/A	.20	4880	HUNT, A.	64.00 394,793.50
27701752	01/17/19	EMAIL TO M. CONNOT REGARDING	N/A	N/A	.10	4880	HUNT, A.	32.00 394,825.50
27701754	01/17/19	PRELIMINARY REVIEW OF J. CLAYTON	N/A	N/A	.90	4880	HUNT, A.	288.00 395,113.50
		PRODUCTION						
27701772	01/17/19	DRAFTED SUBPOENA FOR EXPERT FILE.	N/A	N/A	1.30	4880	HUNT, A.	416.00 395,529.50
27732345	01/18/19	EMAILS REGARDING ISSUANCE OF CA	N/A	N/A	3.00	1554	DODDS, J.A.	1,020.00 396,549.50
		SUBPOENA FOR WITNESS IN OREGON;						
		MULTIPLE TELEPHONE CALLS TO OREGON						
		COURT CLERKS, TELEPHONE CALL WITH						
		TARA GRANGE, COURT CLERK SUPERVISOR						
		REGARDING FOREIGN SUBPOENA; REVIEW						
		OREGON CIVIL COURT RULES AND COURT						
		WEBSITE FOR PROCEDURE AND FORMS.						
27732367	01/18/19	REVIEW OF MULTIPLE RESPONSES TO	N/A	N/A	2.40	1554	DODDS, J.A.	816.00 397,365.50
		REQUESTS FOR PRODUCTION TO ASCERTAIN						



R/A EMAIL:

BILLING ATTORNEY: 3071 MA

.....

(RUN 05/12/20 11:44 )  
(THRU 07/31/19 )

LAST DATE BILLED	FEES and DISB
DATE BILLED THRU	
LAST PYMENT DATE	
12/31/2010	
12/31/2011	
12/31/2012	
12/31/2013	
12/31/2014	
12/31/2015	
12/31/2016	
12/31/2017	
12/31/2018	
12/31/2019	
12/31/2020	
12/31/2021	
12/31/2022	
12/31/2023	
12/31/2024	
12/31/2025	
12/31/2026	
12/31/2027	
12/31/2028	
12/31/2029	
12/31/2030	
12/31/2031	
12/31/2032	
12/31/2033	
12/31/2034	
12/31/2035	
12/31/2036	
12/31/2037	
12/31/2038	
12/31/2039	
12/31/2040	
12/31/2041	
12/31/2042	
12/31/2043	
12/31/2044	
12/31/2045	
12/31/2046	
12/31/2047	
12/31/2048	
12/31/2049	
12/31/2050	
12/31/2051	
12/31/2052	
12/31/2053	
12/31/2054	
12/31/2055	
12/31/2056	
12/31/2057	
12/31/2058	
12/31/2059	
12/31/2060	
12/31/2061	
12/31/2062	
12/31/2063	
12/31/2064	
12/31/2065	
12/31/2066	
12/31/2067	
12/31/2068	
12/31/2069	
12/31/2070	
12/31/2071	
12/31/2072	
12/31/2073	
12/31/2074	
12/31/2075	
12/31/2076	
12/31/2077	
12/31/2078	
12/31/2079	
12/31/2080	
12/31/2081	
12/31/2082	
12/31/2083	
12/31/2084	
12/31/2085	
12/31/2086	
12/31/2087	
12/31/2088	
12/31/2089	
12/31/2090	
12/31/2091	
12/31/2092	
12/31/2093	
12/31/2094	
12/31/2095	
12/31/2096	
12/31/2097	
12/31/2098	
12/31/2099	
12/31/2100	

MPRAC 1034

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
810  
811  
812  
813  
814  
815  
816  
817  
818  
819  
820  
821  
822  
823  
824  
825  
826  
827  
828  
829  
830  
831  
832  
833  
834  
835  
836  
837  
838  
839  
840  
84

## ADDITIONAL RESEARCH

MOTIONS IN LIMINE

## TRIAL PREPARATION

EXPERT TESTIMONY

LOGISTICS; REVIEW

SUPPLEMENTAL DISCLOSURES; REVI

WITH TEAM

### NON RETAINED EXPERT TESTIMONY

TRANSCRIPT AND DRAFT MOTION IN

PTERRE HASCHEFF AS A JUDGE

REVISE AND CIRCULATE TASK LIST AND  
CALL IN FOR CASE STRATEGY CONFERENCE

WENDY'S PRIOR ACTS  
DRAFT MOTION IN LIMINE REGARDING

CASE STRATEGY CONFERENCE WITH TRIAL TEAM

EMAILS REGARDING DISCLOSURES AND  
INDEX OF DOCUMENTS. FOLLOW UP

REGARDING STATUS OF RECEIPT OF GOOD

INDEXING OF DOCUMENTS PRODUCED FOR  
PROSECUTION IN FEDERAL DISTRICT COURTS

# CREATE INDEX OF SUBPOENAED DOCUMENTS

INCLUDING DISCLOSURES AND SUBPOENAS

AND WHEN BY ALL PARTIES EXCEPT WENDY

CONTINUE TRIAL DATE, ADVISE CASE

REVIEW ORDER DENYING PETITION TO

VOIR DIRE; REVIEW PRETRIAL ORDER RE:

ISSUES; REVIEW MOTION TO EXCLUDE AND

REVIEW JESSICA CLAYTON ROUGH DRAFT;

[illegible]



R/A EMAIL:

BILLING ATTORNEY: 3071 MARK J. CONNOT

(RUN 05/12/20 11:44 )  
THRU 07/31/19

LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEEs and DISB
HUNT, A.	96.00 425,030.50
HUNT, A.	32.00 425,062.50
HUNT, A.	96.00 425,158.50
HUNT, A.	288.00 425,446.50
HUNT, A.	32.00 425,478.50
HUNT, A.	64.00 425,542.50
HUNT, A.	160.00 425,702.50
DODDS, J.A.	612.00 426,314.50
CONNOT, M. J.	5,184.00 431,498.50
KIRK, T.S.	1,087.50 432,586.00
HUNT, A.	32.00 432,618.00
HUNT, A.	768.00 433,386.00
HUNT, A.	448.00 433,834.00
DODDS, J.A.	816.00 434,650.00



R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
A  
B  
C  
D  
E  
F  
G  
H  
I  
J  
K  
L  
M  
N  
O  
P  
Q  
R  
S  
T  
U  
V  
W  
X  
Y  
Z

(RUN 05/12/20 11:44 )  
THRU 07/31/19[illegible]



B/A EMAIL:  
R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 M

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

Page 37

CLIENT 180963 MATTER 180963.00001	JAKSICK, WENDY ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEES and DISB
MPRAC 1034 MNAME 180963.00001			
27753052	01/25/19	DODDS REGARDING [REDACTED] CASE STRATEGY CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .20 4880 HUNT, A. 64.00 450,490.00
27753066	01/25/19	REVISE DISCOVERY STATUS REPORT	N/A N/A 2.40 4880 HUNT, A. 768.00 451,258.00
27753333	01/25/19	DRAFT OPPOSITION TO MOTION IN LIMINE	N/A N/A 1.10 4880 HUNT, A. 352.00 451,610.00
27753519	01/25/19	CONFERENCE WITH M. CONNOT, Z. JOHNSON, AND D. LOFFERDO REGARDING [REDACTED]	N/A N/A 1.10 4880 HUNT, A. 352.00 451,962.00
27753601	01/25/19	DRAFT SUPPLEMENT TO AMENDED PETITION	N/A N/A 1.80 4880 HUNT, A. 576.00 452,538.00
27765922	01/26/19	TRIAL PREP; TELE CONFERENCE WITH CHRIS NOLLAND; PREPARE MEMOS TO FILE	N/A N/A 4.60 3071 CONNOT, M. J. 2,944.00 455,482.00
27753753	01/26/19	REVIEW B. WALLACE EXPERT REPORT	N/A N/A .70 4880 HUNT, A. 224.00 455,706.00
27753757	01/26/19	CORRESPOND WITH TRIAL TEAM REGARDING CONFERENCE AND DISCOVERY STATUS REPORTS	N/A N/A .10 4880 HUNT, A. 32.00 455,738.00
27753732	01/26/19	ADDITIONAL RESEARCH REGARDING AND REVISIONS TO OPPOSITION TO MOTION IN LIMINE TO EXCLUDE B. WALLACE AS EXPERT WITNESS	N/A N/A 4.30 4880 HUNT, A. 1,376.00 457,114.00
27810011	01/27/19	CONTINUE REVIEW AND INDEXING OF DOCUMENT PRODUCTIONS FOR INCLUSION IN THIRD DISCLOSURES.	N/A N/A 8.70 1554 DODDS, J.A. 2,958.00 460,072.00
27765925	01/27/19	TRIAL PREP; TELE CONFERENCE WITH TEAM	N/A N/A 3.30 3071 CONNOT, M. J. 2,112.00 462,184.00
27753838	01/27/19	TELEPHONE CONFERENCE WITH TRIAL TEAM AND C. NOLLAND REGARDING [REDACTED]	N/A N/A .80 4880 HUNT, A. 256.00 462,440.00
27753839	01/27/19	REVISE OPPOSITION TO MOTION IN LIMINE	N/A N/A 1.80 4880 HUNT, A. 576.00 463,016.00
27753841	01/27/19	TELEPHONE CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .80 4880 HUNT, A. 256.00 463,272.00
27753880	01/27/19	REVIEW APPLICABLE DEPOSITION EXHIBITS (23 AND 27); APPLICABLE PORTIONS OF W. JAKSICK DEPOSITION; AND REVISE MOTION IN LIMINE REGARDING WENDY'S BAD ACTS.	N/A N/A 5.00 4880 HUNT, A. 1,600.00 464,872.00
27809879	01/28/19	REVIEW UPDATED GRAPHS AND SPREADSHEETS FOR MOTION TO CONTINUE TRIAL DATE; REVIEW DEPOSITION TRANSCRIPTS TO CONFIRM THAT WE HAVE ALL EXHIBITS IN PREPARATION FOR TRIAL, OBTAIN EXHIBITS FROM VERITEXT VENDOR AND UPDATE FILE AND TRIAL FOLDERS WITH EXHIBITS; FURTHER FOLLOW UP REGARDING STATUS OF RECEIPT OF GOOD SAMARITAN RECORDS, RECEIVE AND REVIEW GOOD SAMARITAN RECORDS AND UPDATE FILE AND CASE	N/A N/A 4.70 1554 DODDS, J.A. 1,598.00 466,470.00

R/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT MATTER	180963 180963.00001	JAKSICK, WENDY ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEES and DISB
MPRAC 1034 MONAME 180963.00001				
27772587	01/28/19	TEAM. TRIAL PREPARATION; REVISE WALLACE OBJECTION; REVIEW OBJECTION TO SUBPOENA; REVISE MOTIONS IN LIMINE; REVIEW ROUGH DRAFT OF HARDUNG DEPO; REVISE MOTION TO CONTINUE CONFERENCE WITH L. REYES REGARDING [REDACTED]	N/A N/A 6.70 3071 CONNOT, M. J.	4,288.00 470,758.00
27761565	01/28/19	REVISE MOTION IN LIMINE TO EXCLUDE WENDY'S BAD ACTS AND EMAIL TO M. CONNOT REGARDING THE SAME. REVISE OBJECTION TO MOTION TO EXCLUDE B. WALLACE AND EMAIL TO M. CONNOT REGARDING THE SAME. CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .10 4880 HUNT, A.	32.00 470,790.00
27761666	01/28/19	REVISE MOTION IN LIMINE TO EXCLUDE WENDY'S BAD ACTS AND EMAIL TO M. CONNOT REGARDING THE SAME. REVISE OBJECTION TO MOTION TO EXCLUDE B. WALLACE AND EMAIL TO M. CONNOT REGARDING THE SAME. CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .60 4880 HUNT, A.	192.00 470,982.00
27761758	01/28/19	REVISE MOTION IN LIMINE TO EXCLUDE WENDY'S BAD ACTS AND EMAIL TO M. CONNOT REGARDING THE SAME. CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .20 4880 HUNT, A.	64.00 471,046.00
27761759	01/28/19	REVISE MOTION TO CONTINUE TRIAL AND EXTEND DISCOVERY DEADLINES CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .20 4880 HUNT, A.	64.00 471,110.00
27761760	01/28/19	REVISE MOTION TO CONTINUE TRIAL AND EXTEND DISCOVERY DEADLINES CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A 4.80 4880 HUNT, A.	1,536.00 472,646.00
27762106	01/28/19	REVISE MOTION TO CONTINUE TRIAL AND EXTEND DISCOVERY DEADLINES CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A N/A .20 4880 HUNT, A.	64.00 472,710.00
27762136	01/28/19	CONFERENCE WITH [REDACTED] FANELLI REGARDING [REDACTED]	N/A N/A .20 4880 HUNT, A.	64.00 472,774.00
27762549	01/28/19	REVISE MOTION IN LIMINE REGARDING P. HASCHEFF	N/A N/A .40 4880 HUNT, A.	128.00 472,902.00
27762556	01/28/19	REVIEW RELEVANT EXHIBITS IN CONNECTION WITH MOTION IN LIMINE TO EXCLUDE EVIDENCE REGARDING STAN AND WENDY AGREEMENT	N/A N/A 1.10 4880 HUNT, A.	352.00 473,254.00
27762558	01/28/19	REVIEW MOTION IN LIMINE TO EXCLUDE EVIDENCE REGARDING STAN AND WENDY AGREEMENT	N/A N/A 1.70 4880 HUNT, A.	544.00 473,798.00
27809941	01/29/19	CONTINUE TO ASSIST CASE TEAM WITH TRIAL PREPARATION; ORGANIZATION AND COLLECTION OF DEPOSITIONS AND DEPOSITION EXHIBITS FOR USE AT TRIAL; REVIEW MOTIONS IN LIMINE FOR CITED EXHIBITS, CREATE INDEX OF EXHIBITS, AND PREPARE EXHIBITS FOR FILING WITH EACH MOTION.	N/A N/A 6.40 1554 DODDS, J.A.	2,176.00 475,974.00
27772656	01/29/19	IN LIMINE; REVISE AND FINALIZE MOTIONS IN LIMINE; COMMUNICATE WITH EXPERTS; TRIAL PREPARATION; REVIEW SUPPLEMENTAL PRODUCTIONS; REVIEW	N/A N/A 7.80 3071 CONNOT, M. J.	4,992.00 480,966.00



1445L 414E 5015H  
B/A EMAIL: MConnot@foxrothschild.com

B/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		LAST PYMENT DATE
MPRAC 1034							
MNAME 180963.00001							
27800379	01/30/19	MILEAGE RATE FOR SUBPOENAS.	N/A	N/A	.80 1554 DODDS, J.A.	272.00	484,834.00
		REVIEW AND EDIT INDEX OF PRODUCED DOCUMENTS TO BE INCLUDED IN THIRD DISCLOSURES.					
27783224	01/30/19	REVIEW AND REVISE SUPPLEMENTAL PETITION; WORK ON OPPOSITIONS TO MOTIONS IN LIMINE; ANALYZE PRIVILEGE LOG ISSUES RE: MCL LOG; FOLLOW UP ON PALMER DEPOSITION; REVISE DISCOVERY STATEMENT; REVIEW ORDER DENYING MOTION TO STRIKE; REVIEW TODD'S SUPPLEMENTAL PRODUCTION; REVISE MOTION TO CONTINUE; TRIAL PREPARATION	N/A	N/A	10.20 3071 CONNOT, M. J.	6,528.00	491,362.00
		REVIEW AND EDIT MOTION TO CONTINUE TRIAL					
27780549	01/30/19	CONFER W/ CONNOT AND HUNT RE: EVALUATE AND ANALYZE MOTION IN LIMINE CONCERNING CAMPAGNA; DRAFT OPPOSITION TO SAME AND SEND TO CONNOT; INCORPORATE CONNOT REVISIONS AND CIRCULATE TO AMANDA TO SEND TO TEAM	N/A	N/A	1.30 3083 SUTTEHALL, K. M.	617.50	491,979.50
		LEGAL RESEARCH RE: DUE PROCESS ISSUES RELATING TO DISCOVERY AND DISCOVERY ABUSES AS WELL AS CONCERNING STANDARD FOR EXTENDING TRIALS; SEND EMAILS TO CONNOT AND HUNT RE: P	N/A	N/A	3.30 3083 SUTTEHALL, K. M.	1,567.50	493,547.00
27782886	01/30/19		N/A	N/A	.70 3083 SUTTEHALL, K. M.	332.50	493,879.50
		EVALUATE AND ANALYZE 13 PART MOTION IN LIMINE BY TODD JAKSICK AND CONFER W/ CONNOT RE: ; BEGIN TO DRAFT OPPOSITION/RESPONSES TO SAME; EVALUATE AND ANALYZE STOLBACH REPORT IN RELATION TO FIRST MIL TO EXCLUDE HIM AND HIS REPORT					
27782892	01/30/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	3.00 3083 SUTTEHALL, K. M.	1,425.00	495,304.50
		REVIEWED T. JAKSICK'S PARTIAL RESPONSE TO WENDY'S REQUESTS PURSUANT TO THE COURT'S RECOMMENDATION AND ORDER. REVISE JURY INSTRUCTIONS					
27772692	01/30/19		N/A	N/A	.10 4880 HUNT, A.	32.00	495,336.50
		CONFERENCE WITH M. CONNOT REGARDING					
27772740	01/30/19		N/A	N/A	.60 4880 HUNT, A.	192.00	495,528.50
		REVIEWED T. JAKSICK'S PARTIAL RESPONSE TO WENDY'S REQUESTS PURSUANT TO THE COURT'S RECOMMENDATION AND ORDER. REVISE JURY INSTRUCTIONS					
27772811	01/30/19		N/A	N/A	1.50 4880 HUNT, A.	480.00	496,008.50
27771852	01/30/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.20 4880 HUNT, A.	64.00	496,072.50

R/A EMAIL: 71 LAS VEGAS  
B/ATTY LOC: 3071 MARK J. CONNOT  
BILLING ATTORNEY: 3071 MARK J. CONNOT  
FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY	JAKSICK, WENDY	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	LAST DATE BILLED DATE BILLED THRU LAST PYMENT DATE	FEES and DISB
CLIENT	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				
PRAC	1034					
NAME	180963.00001					
27771872	01/30/19	FINALIZE SUPPLEMENT TO PETITION	N/A	N/A	.30 4880 HUNT, A.	96.00
27771924	01/30/19	REVISE AFFIDAVIT IN SUPPORT OF MOTION TO CONTINUE	N/A	N/A	2.10 4880 HUNT, A.	672.00
27772251	01/30/19	REVISE STATEMENT REGARDING OUTSTANDING DISCOVERY	N/A	N/A	.70 4880 HUNT, A.	224.00
27771124	01/30/19	REVIEW S. JAKSICK OMNIBUS MOTION IN LIMINE	N/A	N/A	.10 4880 HUNT, A.	32.00
27771140	01/30/19	REVIEW MCL PRIVILEGE LOG	N/A	N/A	.50 4880 HUNT, A.	160.00
27771209	01/30/19	TELEPHONE CALL TO LINDA FROM BANK OF AMERICA IN LEGAL ORDER PROCESSING	N/A	N/A	.10 4880 HUNT, A.	32.00
27771327	01/30/19	CONFERENCE WITH M. CONNOT, K. SUTEHALL, AND D. LOFFREDO	N/A	N/A	.40 4880 HUNT, A.	128.00
27771329	01/30/19	REVISE MOTION TO CONTINUE	N/A	N/A	3.60 4880 HUNT, A.	1,152.00
27809771	01/31/19	ASSIST CASE TEAM WITH SERVICE OF SUBPOENAS, JURY INSTRUCTIONS, AND ADDITIONAL DOCUMENTS TO BE INCLUDED IN THIRD DISCLOSURES, DEPOSITION TRANSCRIPTS, EXHIBITS AND OTHER TRIAL RELATED PREPARATION.	N/A	N/A	.50 1554 DODDS, J.A.	170.00
27787769	01/31/19	REVISE OPPOSITIONS TO MOTIONS IN LIMINE; REVISE MOTION TO CONTINUE; REVISE JURY INSTRUCTIONS; REVIEW ADDITIONAL DOCUMENT PRODUCTIONS; TRAVEL TO RENO; TRIAL PREPARATION CONTINUE TO DRAFT OPPOSITIONS TO TODD'S MOTIONS IN LIMINE, EDIT SAME, CIRCULATE TO TEAM	N/A	N/A	11.60 3071 CONNOT, M. J.	7,424.00
27799032	01/31/19	EVALUATE AND REVISE JURY INSTRUCTIONS CONFERENCE WITH M. CONNOT REGARDING CONFERENCE TO TEAM	N/A	N/A	3.20 3083 SUTEHALL, K. M.	1,520.00
27799892	01/31/19	REVISE MOTION TO CONTINUE	N/A	N/A	.80 3083 SUTEHALL, K. M.	380.00
27804138	01/31/19	FURTHER REVISE JURY INSTRUCTIONS AND JURY VERDICT	N/A	N/A	.30 4880 HUNT, A.	96.00
27805340	01/31/19	REVISE MOTION TO CONTINUE	N/A	N/A	1.80 4880 HUNT, A.	576.00
27805888	01/31/19	REVISE MOTION TO CONTINUE AND DECLARATION IN SUPPORT.	N/A	N/A	2.60 4880 HUNT, A.	832.00
27807277	01/31/19	TELEPHONE CONFERENCE WITH Z. JOHNSON AND K. SPENCER REGARDING	N/A	N/A	.80 4880 HUNT, A.	256.00
27811173	01/31/19	MULTIPLE CONFERENCES WITH D. LOFFREDO REGARDING	N/A	N/A	.20 4880 HUNT, A.	64.00
27811176	01/31/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.30 4880 HUNT, A.	96.00
27811185	01/31/19	FINALIZE JURY INSTRUCTIONS AND SEND	N/A	N/A	.20 4880 HUNT, A.	64.00
27811187	01/31/19	FINALIZE JURY INSTRUCTIONS AND SEND	N/A	N/A	.60 4880 HUNT, A.	192.00



~a5L \*414E \*(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY				LAST DATE BILLED		FEEs and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		LAST PYMENT DATE
MPRAC 1034							
MNAME 180963.00001							
27828655	02/04/19	HEARING		N/A	N/A	.90 4880 HUNT, A.	288.00 537,529.50
		REVISE OPPOSITION TO SUPPLEMENTAL					
		MOTION IN LIMINE AND EMAIL TO COURT					
		AND OPPOSING COUNSEL REGARDING THE					
		SAME.					
27829043	02/04/19	REVISE PRODUCTION EXHIBIT AND EMAIL		N/A	N/A	.80 4880 HUNT, A.	256.00 537,785.50
27829244	02/04/19	TO M. CONNOT		N/A	N/A	.30 4880 HUNT, A.	96.00 537,881.50
		CONFERENCES WITH D. LOFFREDO					
		REGARDING [REDACTED]					
27829256	02/04/19	REVIEW OPPOSITION TO MOTION TO		N/A	N/A	.40 4880 HUNT, A.	128.00 538,009.50
		CONTINUE					
27829258	02/04/19	CONFERENCE WITH K. SUTTEHALL		N/A	N/A	.10 4880 HUNT, A.	32.00 538,041.50
		REGARDING [REDACTED]					
27829260	02/04/19	REVIEW AND EMAIL TO M. CONNOT		N/A	N/A	.30 4880 HUNT, A.	96.00 538,137.50
		REGARDING [REDACTED]					
27830329	02/04/19	TELEPHONE CONFERENCE WITH M. CONNOT		N/A	N/A	.20 4880 HUNT, A.	64.00 538,201.50
		REGARDING [REDACTED]					
27866739	02/05/19	ATTEND COURT; TRIAL PREPARATION;		N/A	N/A	10.40 3071 CONNOT, M. J.	6,656.00 544,857.50
		ATTEND SETTLEMENT CONFERENCE					
27835559	02/05/19	CONFER W/ HUNT, RE. [REDACTED]		N/A	N/A	.30 3083 SUTTEHALL, K. M.	142.50 545,000.00
		[REDACTED]					
		AND REVIEW SAME)					
27830344	02/05/19	CONFERENCE WITH D. LOFFREDO		N/A	N/A	.10 4880 HUNT, A.	32.00 545,032.00
		REGARDING [REDACTED]					
27830389	02/05/19	REVIEW COURT'S ORDER REGARDING JURY		N/A	N/A	.20 4880 HUNT, A.	64.00 545,096.00
		INSTRUCTIONS					
27830485	02/05/19	CONFERENCE WITH M. CONNOT REGARDING		N/A	N/A	.10 4880 HUNT, A.	32.00 545,128.00
		[REDACTED]					
27830860	02/05/19	CONFERENCE WITH D. LOFFREDO REGARDING		N/A	N/A	.10 4880 HUNT, A.	32.00 545,160.00
		[REDACTED]					
27830864	02/05/19	CONFERENCE WITH K. SUTTEHALL		N/A	N/A	.20 4880 HUNT, A.	64.00 545,224.00
		REGARDING [REDACTED] AND					
27830869	02/05/19	REVIEW TODD AND STAN'S SETTLEMENT		N/A	N/A	.60 4880 HUNT, A.	192.00 545,416.00
		AGREEMENT AND EMAIL TO TRIAL TEAM					
		REGARDING THE SAME.					
27831440	02/05/19	REVIEW K. RILEY PRIVILEGE LOG		N/A	N/A	.50 4880 HUNT, A.	160.00 545,576.00
27807231	02/06/19	REVIEW JESSICA CLAYTON TRANSCRIPT		N/A	N/A	.40 1554 DODDS, J.A.	136.00 545,712.00
		FOR HER HOME ADDRESS FOR SERVICE OF					
		TRIAL SUBPOENA, COMMUNICATE WITH					
		CASE TEAM REGARDING SAME.					
27866740	02/06/19	TRIAL PREPARATION		N/A	N/A	8.40 3071 CONNOT, M. J.	5,376.00 551,088.00

-ta5L -t14E -{s015H

B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED		FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		LAST PYMENT DATE
MRAC	1034							
MNAME	180963.00001							
27841445	02/06/19	LEGAL RESEARCH PER REQUEST BY CONNOT	N/A	N/A	.50	3083 SUTEHALL, K. M.	237.50	551,325.50
		CONCERNING BURDEN OF						
		ASSERTING/PROVING PRIVILEGE/WORK						
		PRODUCT AND SEND SAME TO CONNOT						
27839484	02/06/19	REVISE MCL PRODUCTION LOG	N/A	N/A	.80	4880 HUNT, A.	256.00	551,581.50
27839549	02/06/19	CONFERENCE WITH D. LOFFREDO	N/A	N/A	.10	4880 HUNT, A.	32.00	551,613.50
		REGARDING [REDACTED]						
27839552	02/06/19	REVIEW AND CIRCULATE FILED REPLY IN	N/A	N/A	.20	4880 HUNT, A.	64.00	551,677.50
		SUPPORT OF SUBTRUST ACCOUNTINGS						
27866741	02/07/19	TRIAL PREPARATION	N/A	N/A	5.40	3071 CONNOT, M. J.	3,456.00	555,133.50
27841461	02/07/19	TELEPHONE CONFERENCE WITH M. CONNOT	N/A	N/A	.10	4880 HUNT, A.	32.00	555,165.50
		REGARDING [REDACTED]						
27840579	02/07/19	REVIEW ORDER GRANTING IN PART	N/A	N/A	.20	4880 HUNT, A.	64.00	555,229.50
		DENYING IN PART MOTION TO COMPEL						
		SUBTRUST ACCOUNTING.						
27840589	02/07/19	REVISE JURY INSTRUCTIONS TO BE IN	N/A	N/A	2.70	4880 HUNT, A.	864.00	556,093.50
		COMPLIANCE WITH COURT'S ORDER						
27908072	02/08/19	REVIEW AND EDIT JURY INSTRUCTIONS IN	N/A	N/A	2.60	1554 DODDS, J.A.	884.00	556,977.50
		ACCORDANCE WITH JUDGE'S						
		INSTRUCTIONS, COMMUNICATE WITH CASE						
		TEAM REGARDING SAME.						
27866744	02/08/19	TRIAL PREPARATION AND SETTLEMENT	N/A	N/A	5.70	3071 CONNOT, M. J.	3,648.00	560,625.50
		DISCUSSIONS						
27862183	02/08/19	CONFERENCE WITH D. LOFFREDO	N/A	N/A	.20	4880 HUNT, A.	64.00	560,689.50
		REGARDING [REDACTED]						
27862342	02/08/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.20	4880 HUNT, A.	64.00	560,753.50
		[REDACTED]						
27866750	02/09/19	TRIAL PREP	N/A	N/A	2.90	3071 CONNOT, M. J.	1,856.00	562,609.50
27866751	02/10/19	RETURN TRAVEL TO LAS VEGAS FROM	N/A	N/A	7.20	3071 CONNOT, M. J.	4,608.00	567,217.50
		EXECUTIVE COMMITTEE RETREAT						
27866752	02/10/19	TRIAL PREP	N/A	N/A	4.90	3071 CONNOT, M. J.	3,136.00	570,353.50
27891476	02/11/19	TRIAL PREPARATION; TRAVEL TO RENO	N/A	N/A	11.10	3071 CONNOT, M. J.	7,104.00	577,457.50
27863177	02/11/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.30	4880 HUNT, A.	96.00	577,553.50
		[REDACTED]						
27863670	02/11/19	RESEARCH REGARDING JURY INSTRUCTION	N/A	N/A	.70	4880 HUNT, A.	224.00	577,777.50
		ON SPOILIATION, AGENT PRINCIPLE						
		RELATIONSHIP, AND DISCOVERY ABUSES						
27863853	02/11/19	REVIEW AND REVISE SUPPLEMENTAL	N/A	N/A	.90	4880 HUNT, A.	288.00	578,065.50
		AFFIDAVIT; CONFERENCE WITH M. CONNOT						
		REGARDING THE SAME.						
27863854	02/11/19	CONFERENCES WITH D. LOFFREDO	N/A	N/A	.20	4880 HUNT, A.	64.00	578,129.50
		REGARDING [REDACTED]						
27863855	02/11/19	REVIEW T. JAKSICK JURY INSTRUCTIONS	N/A	N/A	3.10	4880 HUNT, A.	992.00	579,121.50



\*\*\*\*\*  
 -ta5L -t14E -(s015H  
 B/A EMAIL: MConnot@foxrothschild.com  
 B/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

\*\*\*\*\*  
 FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT	DATE	DESCRIPTION	N/A	N/A	8.60	3071	CONNOT, M. J.	5,504.00	584,625.50
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	N/A	N/A	.20	4880	HUNT, A.	64.00	584,689.50
MPRAC	1034								
MNAME	180963.00001								
TO DETERMINE WHETHER TO STIPULATE TO									
SAID INSTRUCTIONS									
27891479	02/12/19	TRIAL PREPARATION	N/A	N/A					
27870861	02/12/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A					
27891480	02/13/19	TRIAL PREPARATION AND SETTLEMENT	N/A	N/A	13.40	3071	CONNOT, M. J.	8,576.00	593,265.50
27877229	02/13/19	DISCUSSIONS	N/A	N/A	.50	4880	HUNT, A.	160.00	593,425.50
27877259	02/13/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.50	4880	HUNT, A.	160.00	593,585.50
27877260	02/13/19	REVIEW COMPLAINT AGAINST W. JAKSICK	N/A	N/A					
		AND EMAIL TO M. CONNOT REGARDING THE							
		SAME.							
27877262	02/13/19	CONFERENCE WITH D. IOFFREDO	N/A	N/A	.20	4880	HUNT, A.	64.00	593,649.50
27891482	02/14/19	REGARDING	N/A	N/A					
27884958	02/14/19	REVIEWED COURT'S MINUTE ORDER	N/A	N/A	.20	4880	HUNT, A.	64.00	593,713.50
27885059	02/14/19	TRIAL AND CONTINUED TRIAL PREPARATION	N/A	N/A	11.90	3071	CONNOT, M. J.	7,616.00	601,329.50
		CONFERENCE WITH D. IOFFREDO	N/A	N/A	.20	4880	HUNT, A.	64.00	601,393.50
		REGARDING							
		ADDITIONAL RESEARCH REGARDING JURY	N/A	N/A	1.40	4880	HUNT, A.	448.00	601,841.50
		INSTRUCTIONS AND EMAIL TO M. CONNOT							
		REGARDING THE SAME.							
27891483	02/15/19	TRIAL, CONTINUED TRIAL PREPARATION,	N/A	N/A	12.20	3071	CONNOT, M. J.	7,808.00	609,649.50
27949436	02/15/19	AND RETURN TO LAS VEGAS	N/A	N/A	1.70	4880	HUNT, A.	544.00	610,193.50
27949437	02/15/19	REVIEW AND COMPARE TODD'S PROPOSED	N/A	N/A					
		JURY INSTRUCTIONS TO DETERMINE WHICH							
		ARE ACCEPTABLE TO STIPULATE TO							
		CONFERENCES WITH M. CONNOT REGARDING	N/A	N/A	.90	4880	HUNT, A.	288.00	610,481.50
27949438	02/15/19	REVIEW UPDATED JURY INSTRUCTIONS	N/A	N/A	.90	4880	HUNT, A.	288.00	610,769.50
		FROM T. JAKSICK AND EMAIL TO K.							
		ROBISON REGARDING THE SAME							
27891484	02/16/19	TRIAL PREPARATION	N/A	N/A	3.10	3071	CONNOT, M. J.	1,984.00	612,753.50
27891485	02/17/19	TRIAL PREPARATION	N/A	N/A	4.20	3071	CONNOT, M. J.	2,688.00	615,441.50
27949577	02/18/19	TRIAL PREPARATION	N/A	N/A	7.10	3071	CONNOT, M. J.	4,544.00	619,985.50
27914503	02/18/19	REVIEW SPECIAL VERDICT FORMS, REVISE	N/A	N/A	1.30	4880	HUNT, A.	416.00	620,401.50
27954867	02/19/19	THE SAME AND EMAIL TO M. CONNOT	N/A	N/A	12.20	3071	CONNOT, M. J.	7,808.00	628,209.50
27950201	02/19/19	TRIAL AND TRIAL PREPARATION	N/A	N/A	1.10	4880	HUNT, A.	352.00	628,561.50
		RESEARCH REGARDING BURDEN SHIFTING							
		IN THE EVENT OF SELF DEALING							
		FIDUCIARY							
27950202	02/19/19	REVISE JURY VERDICT QUESTIONS	N/A	N/A	1.80	4880	HUNT, A.	576.00	629,137.50
27950203	02/19/19	FURTHER REVISE JURY INSTRUCTIONS	N/A	N/A	4.30	4880	HUNT, A.	1,376.00	630,513.50
27954872	02/20/19	TRIAL AND TRIAL PREPARATION	N/A	N/A	11.70	3071	CONNOT, M. J.	7,488.00	638,001.50
28011859	02/20/19	REVIEW EMAIL FROM A. DICK REGARDING	N/A	N/A	.20	4880	HUNT, A.	64.00	638,065.50
		JURY INSTRUCTIONS, CONFERENCE WITH							
		D. IOFFREDO REGARDING THE SAME							

435L 414E (s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY IOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	LAST DATE BILLED	DATE BILLED THRU	LAST PAYMENT DATE	FEES and DISB
MATTER 180963 JAKSICK, WENDY				
ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				
MPRAC 1034				
MNAME 180963.00001				
28011862 02/20/19				
REVIEW REVISED JURY INSTRUCTIONS AND VERDICT QUESTIONS FOR APPROVAL AND EMAIL TO D. LOFFREDO REGARDING THE SAME.	N/A	N/A	30 4880 HUNT, A.	96.00 638,161.50
27954878 02/21/19				
TRIAL AND TRIAL PREPARATION	N/A	N/A	12.20 3071 CONNOT, M. J.	7,808.00 645,969.50
REVIEW NEVADA REVISED STATUTE REGARDING NOTARY REQUIREMENTS AND NEVADA ADMINISTRATIVE CODE TO DRAFT ADDITIONAL JURY INSTRUCTIONS.	N/A	N/A	1.20 4880 HUNT, A.	384.00 646,353.50
27951816 02/21/19				
DRAFT ADDITIONAL JURY INSTRUCTIONS AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.60 4880 HUNT, A.	192.00 646,545.50
27951867 02/21/19				
REVIEW NEVADA REVISED STATUTES REGARDING POWER OF ATTORNEY; DRAFT PROPOSED JURY INSTRUCTION AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.60 4880 HUNT, A.	192.00 646,737.50
27954884 02/22/19				
TRIAL AND TRIAL PREPARATION; RETURN TRAVEL TO LAS VEGAS	N/A	N/A	10.10 3071 CONNOT, M. J.	6,464.00 653,201.50
27952562 02/22/19				
EMAIL TO M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880 HUNT, A.	32.00 653,233.50
27954889 02/23/19				
TRIAL PREPARATION	N/A	N/A	4.20 3071 CONNOT, M. J.	2,688.00 655,921.50
27954887 02/24/19				
TRIAL AND TRIAL PREPARATION; RETURN TRAVEL TO RENO	N/A	N/A	6.30 3071 CONNOT, M. J.	4,032.00 659,953.50
28022748 02/25/19				
ADDITIONAL RESEARCH REGARDING NOTARY REQUIREMENTS AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	12.90 3071 CONNOT, M. J.	8,256.00 668,209.50
27962476 02/25/19				
ADDITIONAL RESEARCH REGARDING BURDEN SHIFTING AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	1.10 4880 HUNT, A.	352.00 668,561.50
28023950 02/26/19				
TRIAL	N/A	N/A	14.10 3071 CONNOT, M. J.	9,024.00 677,585.50
28025677 02/27/19				
TRIAL	N/A	N/A	13.20 3071 CONNOT, M. J.	8,448.00 686,033.50
28005917 02/27/19				
CONFERENCES WITH D. LOFFREDO REGARDING [REDACTED]	N/A	N/A	.20 4880 HUNT, A.	64.00 686,097.50
28010421 02/28/19				
ADDITIONAL RESEARCH REGARDING BURDEN SHIFTING AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.80 4880 HUNT, A.	256.00 686,353.50
28094288 03/01/19				
TRIAL	N/A	N/A	5.30 3071 CONNOT, M. J.	3,392.00 689,745.50
28043003 03/01/19				
REVIEW AND RESPONSE TO EMAIL FROM M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880 HUNT, A.	32.00 689,777.50
28043246 03/01/19				
CONFERENCE WITH M. CONNOT AND 2 JOHNSON REGARDING [REDACTED]	N/A	N/A	.20 4880 HUNT, A.	64.00 689,841.50
28043509 03/03/19				
DRAFT OPPOSITION TO PROPOSED JURY INSTRUCTIONS AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	3.40 4880 HUNT, A.	1,088.00 690,929.50
28043512 03/03/19				
CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.40 4880 HUNT, A.	128.00 691,057.50

-5a5L \*414E \*(s015H  
 B/A EMAIL: MConnot@foxrothschild.com  
 B/A EMAIL:  
 B/ATTY LOC: 71 LAS VEGAS  
 BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
 DETAILED BILLING REPORT  
 PROFORMA #

(RUN 05/12/20 11:44 )  
 THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY				LAST DATE BILLED		FEEs and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU		LAST PYMENT DATE
MPRAC 1034							
MNAME 180963.00001							
28043520	03/03/19	FURTHER REVISE OPPOSITION AND FINALIZE FOR FILING; EMAIL TO COURT AND OPPOSING COUNSEL REGARDING THE SAME.	N/A	N/A	1.80 4880 HUNT, A.	576.00	691,633.50
28094289	03/04/19	TRIAL	N/A	N/A	11.10 3071 CONNOT, M. J.	7,104.00	698,737.50
28094290	03/05/19	CONFERENCE WITH CLIENT AND DEBRIEFING; RETURN TRAVEL TO LAS VEGAS	N/A	N/A	3.20 3071 CONNOT, M. J.	2,048.00	700,785.50
28093252	03/11/19	CONFERENCE WITH M. CONNOT REGARDING NEXT STEPS	N/A	N/A	.10 4880 HUNT, A.	32.00	700,817.50
28093666	03/12/19	REVIEWED NRS 18.110 AND SPAN, TODD AND INCLINE'S MEMORANDUM OF COSTS.	N/A	N/A	.50 4880 HUNT, A.	160.00	700,977.50
28094161	03/12/19	CONFERENCE WITH M. CONNOT, Z. JOHNSON, AND K. SPENCER REGARDING	N/A	N/A	.70 4880 HUNT, A.	224.00	701,201.50
28094200	03/12/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.40 4880 HUNT, A.	128.00	701,329.50
28094422	03/12/19	RESEARCH REGARDING MOTION TO RETAX COSTS	N/A	N/A	2.60 4880 HUNT, A.	832.00	702,161.50
28094472	03/12/19	BEGUN DRAFT OF MOTION TO RETAX COSTS	N/A	N/A	1.20 4880 HUNT, A.	384.00	702,545.50
28122807	03/13/19	CONFERENCE WITH D. LOFFERDO REGARDING	N/A	N/A	.30 4880 HUNT, A.	96.00	702,641.50
28122829	03/13/19	REVISE MOTION TO RETAX	N/A	N/A	4.60 4880 HUNT, A.	1,472.00	704,113.50
28123086	03/13/19	ADDITIONAL RESEARCH REGARDING FRAUDER FACTORS IN CONNECTION WITH MOTION TO RETAX	N/A	N/A	.60 4880 HUNT, A.	192.00	704,305.50
28123145	03/13/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.30 4880 HUNT, A.	96.00	704,401.50
28198834	03/13/19	FURTHER REVISIONS TO MOTION TO RETAX	N/A	N/A	1.60 4880 HUNT, A.	512.00	704,913.50
28123813	03/14/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.20 4880 HUNT, A.	64.00	704,977.50
28123839	03/14/19	FURTHER REVISE MOTION TO RETAX	N/A	N/A	.70 4880 HUNT, A.	224.00	705,201.50
28124011	03/14/19	CONFERENCE WITH D. LOFFERDO REGARDING	N/A	N/A	.10 4880 HUNT, A.	32.00	705,233.50
28128214	03/18/19	CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	N/A	.20 4880 HUNT, A.	64.00	705,297.50
28128651	03/18/19	DRAFT OPPOSITION TO MOTION FOR FINAL JUDGMENT BASED UPON JURY VERDICT	N/A	N/A	2.00 4880 HUNT, A.	640.00	705,937.50
28135056	03/19/19	REVISE OPPOSITION TO MOTION FOR ENTRY OF JUDGMENT ON JURY VERDICT AND EMAIL TO M. CONNOT REGARDING THE SAME.	N/A	N/A	.50 4880 HUNT, A.	160.00	706,097.50
28164671	03/21/19	CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A	.30 4880 HUNT, A.	96.00	706,193.50

\*\*\*5L -14E - (s015H  
B/A EMAIL: MConnot@foxrothschild.com

B/A EMAIL: MConnot@foxrothschild.com

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	LAST DATE BILLED	DATE BILLED THRU	LAST PYMT DATE	FEES and DISB
180963 JAKSICK, WENDY				
MATTER 180963.00001 ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				
MPRAC 1034				
MNAME 180963.00001				
28164996 03/21/19				
REVIEW REVISIONS AND FURTHER REVISE	N/A	N/A	.60 4880 HUNT, A.	192.00 706,385.50
OPPOSITION TO MOTION FOR ENTRY OF				
JUDGMENT				
28166128 03/22/19			.20 4880 HUNT, A.	64.00 706,449.50
CONFERENCE WITH M. CONNOT REGARDING				
28166508 03/22/19			.90 4880 HUNT, A.	288.00 706,737.50
REVIEW T. JAKSICK MOTION FOR	N/A	N/A		
ATTORNEY'S FEES.				
28166509 03/22/19			1.50 4880 HUNT, A.	480.00 707,217.50
DRAFT OPPOSITION TO T. JAKSICK	N/A	N/A		
MOTION FOR ATTORNEY'S FEES.				
28166547 03/24/19			1.30 4880 HUNT, A.	416.00 707,633.50
CASE LAW RESEARCH REGARDING OFFER OF	N/A	N/A		
JUDGMENT				
28166548 03/24/19			.60 4880 HUNT, A.	192.00 707,825.50
RESEARCH REGARDING AWARD OF	N/A	N/A		
ATTORNEY'S FEES PURSUANT TO NRS 18				
28168288 03/25/19			.10 4880 HUNT, A.	32.00 707,857.50
TELEPHONE CONFERENCE WITH Z. JOHNSON	N/A	N/A		
REGARDING				
28168508 03/25/19			5.10 4880 HUNT, A.	1,632.00 709,489.50
REVISE OPPOSITION TO MOTION FOR	N/A	N/A		
ATTORNEY'S FEES				
28170193 03/25/19			.40 4880 HUNT, A.	128.00 709,617.50
CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A		
FEES; CONFERENCE WITH Z. JOHNSON				
REGARDING THE SAME.				
28170203 03/25/19			.30 4880 HUNT, A.	96.00 709,713.50
CONFERENCES WITH D. JOFFREDO	N/A	N/A		
REGARDING				
28170364 03/25/19			.30 4880 HUNT, A.	96.00 709,809.50
REVISE EXHIBIT 1 TO OPPOSITION TO	N/A	N/A		
MOTION FOR ATTORNEY'S FEES				
28189617 03/26/19			.20 4880 HUNT, A.	64.00 709,873.50
REVIEW RESPONSE TO MEMORANDUM OF	N/A	N/A		
COSTS FILED BY T. JAKSICK AND NOTICE				
OF WITHDRAW				
28189638 03/26/19			.10 4880 HUNT, A.	32.00 709,905.50
CASE STRATEGY CONFERENCE WITH M.	N/A	N/A		
CONNOT				
28313020 04/01/19			.10 1554 DODDS, J.A.	34.00 709,939.50
DOWNLOAD DOCUMENTS RECEIVED FROM LA	N/A	N/A		
CARDIOLOGY, UPDATE FILE AND TEAM				
WITH SAME.				
28325100 04/08/19			.30 4880 HUNT, A.	96.00 710,035.50
CONFERENCE WITH M. CONNOT REGARDING	N/A	N/A		
28323252 04/18/19			.20 4880 HUNT, A.	64.00 710,099.50
REVIEW T. JAKSICK MOTION FOR	N/A	N/A		
PRETRIAL STATUS CONFERENCE AND EMAIL				
TO M. CONNOT REGARDING THE SAME.				
28411499 04/22/19			.20 4880 HUNT, A.	64.00 710,163.50
CONFERENCE WITH Z. JOHNSON REGARDING	N/A	N/A		
28411525 04/22/19			.50 4880 HUNT, A.	160.00 710,323.50
REVIEW MOTION IN LIMINE	N/A	N/A		
28410637 04/22/19			.20 4880 HUNT, A.	64.00 710,387.50
CONFERENCES WITH M. CONNOT REGARDING	N/A	N/A		

R/A EMAIL: FOX ROTHSCHILD LLP  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT  
PROFORMA # DETAILED BILLING REPORT

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT		JAKSICK, WENDY	JAKSICK AND MICHAEL S. KIMMEL		LAST DATE BILLED		FEES and DISB			
MATTER		ADV.	TODD B.	JAKSICK	DATE BILLED THRU	LAST PYMENT DATE				
180963	180963.00001	28411533	04/22/19	TELEPHONE CONFERENCE WITH Z. JOHNSON REGARDING [REDACTED]	N/A	.20	4880	HUNT, A.	64.00	710,451.50
MPRAC 1034		28383600	04/29/19	TELEPHONE CONFERENCES WITH Z. JOHNSON REGARDING [REDACTED]	N/A	.20	4880	HUNT, A.	64.00	710,515.50
NAME 180963.00001		28383605	04/29/19	REVIEW OPPOSITION TO MOTION IN LIMINE	N/A	.50	4880	HUNT, A.	160.00	710,675.50
		28383612	04/29/19	TELEPHONE CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	.10	4880	HUNT, A.	32.00	710,707.50
		28383615	04/29/19	TELEPHONE CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	.10	4880	HUNT, A.	32.00	710,739.50
		28408358	04/30/19	CONFERENCE WITH Z. JOHNSON REGARDING [REDACTED]	N/A	.30	4880	HUNT, A.	96.00	710,835.50
		28408383	04/30/19	DRAFT OPPOSITION TO JOINDER TO MOTION IN LIMINE/MOTION FOR SUMMARY JUDGMENT	N/A	.40	4880	HUNT, A.	128.00	710,963.50
		28408435	04/30/19	FILE OPPOSITION TO JOINDER TO MOTION IN LIMINE/MOTION FOR SUMMARY JUDGMENT AND EMAIL TO OPPOSING COUNSEL REGARDING THE SAME	N/A	.30	4880	HUNT, A.	96.00	711,059.50
		28573674	05/01/19	TELEPHONE CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	.10	4880	HUNT, A.	32.00	711,091.50
		28573682	05/01/19	CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]; SEND FOLLOW UP EMAILS TO TRIAL TEAM REGARDING THE SAME.	N/A	.30	4880	HUNT, A.	96.00	711,187.50
		28589716	05/01/19	CASE STRATEGY CONFERENCE WITH M. CONNOT. CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	1.40	4880	HUNT, A.	448.00	711,635.50
		28573866	05/02/19	CONFERENCE WITH D. LOFFREDO REGARDING [REDACTED]	N/A	.20	4880	HUNT, A.	64.00	711,699.50
		28573886	05/02/19	TELEPHONE CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	.10	4880	HUNT, A.	32.00	711,731.50
		28573888	05/02/19	EMAIL TO TRIAL TEAM REGARDING [REDACTED]	N/A	.10	4880	HUNT, A.	32.00	711,763.50
		28573944	05/02/19	ATTEND CONFERENCE CALL WITH TRIAL TEAM	N/A	.50	4880	HUNT, A.	160.00	711,923.50
		28574160	05/03/19	CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	.10	4880	HUNT, A.	32.00	711,955.50
		28574615	05/06/19	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	.20	4880	HUNT, A.	64.00	712,019.50
		28574617	05/06/19	FOLLOW UP EMAIL TO Z. JOHNSON	N/A	.10	4880	HUNT, A.	32.00	712,051.50

-ta5L -414E -{s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT	180963	JAKSICK, WENDY				LAST DATE BILLED	FEES and DISB
MATTER	180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL				DATE BILLED THRU	
MPRAC	1034					LAST PYMENT DATE	
MNAME	180963.00001						
28574983	05/07/19	REGARDING [REDACTED] CASE STRATEGY CONFERENCE WITH M. CONNOT	N/A	N/A	.20 4880	HUNT, A.	712,115.50
28574987	05/07/19	REVIEW AND REVISE SECOND SUPPLEMENT 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	N/A	N/A	.50 4880	HUNT, A.	712,275.50
28574993	05/07/19	REVIEW MEMO FROM K. SPENCER AND RESPOND REGARDING THE SAME.	N/A	N/A	.30 4880	HUNT, A.	712,371.50
28476468	05/08/19	TELEPHONE CONFERENCE WITH D. MOREDO REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	712,403.50
28476470	05/08/19	TELEPHONE CONFERENCE WITH B. SPENCER REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	712,435.50
28476632	05/08/19	FOLLOW UP CONFERENCE WITH B. SPENCER REGARDING [REDACTED]S	N/A	N/A	.10 4880	HUNT, A.	712,467.50
28576955	05/09/19	REVIEWED T. JAKSICK'S SUPPLEMENTAL TRIAL STATEMENT	N/A	N/A	.90 4880	HUNT, A.	712,755.50
28577006	05/09/19	REVIEWED W. JAKSICK'S DRAFT DISCLOSURE OF WITNESSES AND EXHIBITS FOR EQUITABLE TRIAL	N/A	N/A	.70 4880	HUNT, A.	712,979.50
28577014	05/09/19	EMAIL TO TRIAL TEAM REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	713,011.50
28597060	05/10/19	REVIEWED S. JAKSICK JOINDER TO TRIAL STATEMENT	N/A	N/A	.10 4880	HUNT, A.	713,043.50
28586037	05/14/19	EMAIL TO TRIAL TEAM REGARDING DRAFT EVIDENTIARY BRIEF	N/A	N/A	.10 4880	HUNT, A.	713,075.50
28586041	05/14/19	REVIEW AND REVISE W. JAKSICK BRIEF IN SUPPORT OF DOCUMENTARY EVIDENCE AND EMAIL TO TRIAL TEAM REGARDING THE SAME.	N/A	N/A	1.10 4880	HUNT, A.	713,427.50
28586043	05/14/19	REVIEW AND REVISE W. JAKSICK DECLARATION IN SUPPORT OF BRIEF DOCUMENTARY EVIDENCE AND EMAIL TO TRIAL TEAM REGARDING THE SAME.	N/A	N/A	.30 4880	HUNT, A.	713,523.50
28510769	05/16/19	TELEPHONE CONFERENCE WITH TRIAL TEAM REGARDING [REDACTED]	N/A	N/A	.60 4880	HUNT, A.	713,715.50
28515816	05/21/19	EMAIL TO TRIAL TEAM REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	713,747.50
28515817	05/21/19	CONFERENCE WITH M. CONNOT REGARDING [REDACTED]	N/A	N/A	.10 4880	HUNT, A.	713,779.50



~a5L ~414E ~s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/AFY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

CLIENT 180963	JAKSICK, WENDY	LAST DATE BILLED	FEES and DISB
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL	DATE BILLED THRU	
MPRAC 1034		LAST PYMENT DATE	
MNAME 180963.00001			
28726833	06/26/19	TRUSTEES; DRAFT ELECTRONIC MEMORANDUM TO A HUNT REGARDING THE SAME CONFERENCE WITH L. REYES REGARDING N/A N/A .20 4880 HUNT, A. 67.00 717,851.00	
28751384	06/27/19	STRATEGY CONFERENCE WITH A HUNT REGARDING [REDACTED] N/A N/A .10 4620 REYES, L. 32.00 717,883.00	
28729993	06/27/19	RESEARCH REGARDING EQUITABLE REMEDIES AND REVISE TRIAL BRIEF N/A N/A 3.40 4880 HUNT, A. 1,139.00 719,022.00	
28731014	06/27/19	RESEARCH REGARDING CASE LAW SUPPORT EQUITABLE CLAIMS N/A N/A .90 4880 HUNT, A. 301.50 719,323.50	
		1462.50 *TIME VALUE TOTAL*	719,323.50

TIMEKEEPER SUMMARY					
TPKR	TITLE	TIMEKEEPER	BILLED RATE	BILLED HOURS	BILLED VALUE
1940	PARALEGAL	CELUM, P. M.	295.00	39.60	11,682.00
3071	PARTNER	CONNOT, M. J.	640.00	761.30	487,232.00
1554	PARALEGAL	DODDS, J.A.	340.00	63.50	21,590.00
4738	ASSOCIATE	FANELLI, M.J.	345.00	.70	241.50
1828	PARTNER	GALLEGOS, Y. M.	520.00	.30	156.00
4880	ASSOCIATE	HUNT, A.	320.32	527.00	168,808.00
4836	ASSOCIATE	KIRK, T.S.	375.00	13.00	4,875.00
4620	ASSOCIATE	REYES, L.	307.18	11.00	3,379.00
3083	COUNSEL	SUTHERLAND, K. M.	475.00	44.30	21,042.50
5007	STAFF	TUMA, J.	100.00	.70	70.00
4724	E-DISCOVERY	WURST, L.	225.00	1.10	247.50

DISBURSEMENT SUMMARY	
CODE	DESCRIPTION
101	WESTLAW, RESEARCH
25	SUBPOENA SERVICE
27	DEPOSITION/TRANSCRIPT
38	MEDICAL/HOSPITAL RECORDS
41	EXPERT FEES
	1,531.16
	2,536.41
	23,975.42
	191.00
	19,396.50



-6a5L -614E -(s015H  
B/A EMAIL: MConnot@foxrothschild.com  
R/A EMAIL:  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #  
(RUN 05/12/20 11:44 )  
THRU 07/31/19

		LAST DATE BILLED	FEEs and DISB
		DATE BILLED THRU	
		LAST PYMENT DATE	
CLIENT 180963	JAKSICK, WENDY		
MATTER 180963.00001	ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL		
MPRAC 1034			
MNAME 180963.00001			
465	COURT REPORT FEES	25,645.58	
467	MISCELLANEOUS OUTSIDE SERVICES	60.00	
49	PROFESSIONAL SERVICES	.00	
72	PUBLICATION/RESEARCH	15.20	
76	OUTSIDE VENDOR COPIES	2,103.16	
77	MESSENGER SERVICE/DELIVERY	831.50	
82	MESSENGER SERVICE/FEDERAL EXPRESS	260.78	
84	PHOTOCOPYING	448.80	
86	SECRETARIAL OVERTIME	150.63	
87	POSTAGE CHARGES	14.45	
941	AIR - OUT-OF-TOWN TRAVEL EXPENSE	9,938.28	
943	TAXI/UBER - OUT-OF-TOWN TRAVEL EXPENSE	382.97	
944	RENTAL CAR - OUT-OF-TOWN TRAVEL EXPENSE	2,924.58	
947	PARKING - OUT-OF-TOWN TRAVEL EXPENSE	114.50	
948	HOTEL - OUT-OF-TOWN TRAVEL EXPENSE	2,804.44	
949	MEALS - OUT-OF-TOWN TRAVEL EXPENSE	3,892.22	
950	OTHER - OUT-OF-TOWN TRAVEL EXPENSE	444.98	
TOTAL DISBURSEMENTS		97,662.56	

FEEs VALUE 719,323.50 \*\* TOTAL FEEs & DISBURSEMENTS 816,986.06  
LESS UNALLOCATED .00 \*\* ESCROW BALANCE - REGULAR .00  
LESS INTERIM .00 \*\* RETAINER BALANCE - ESCROW .00  
TOTAL FEEs 719,323.50

TASK CODE SUMMARY		
TASK CODE	DESCRIPTION	AMOUNT
N/A		719,323.50

OUTSTANDING INVOICE SUMMARY			
Invoice No.	Inv Date	Original Amt	Balance Due
		Fees Disbursements Amount Paid	
Total Outstanding Invoices		.00 .00 .00	.00

START-TO-DATE FEEs BILLED = .00 YTD FEEs BILLED = .00 A/R BALANCE THIS MATTER = .00  
START-TO-DATE DISB BILLED = .00 YTD DISB BILLED = .00

~&a5L ~&l4E ~&(s015H  
B/A EMAIL: MConnot@foxrothschild.com

R/A EMAIL:

B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT

FOX ROTHSCHILD LLP  
DETAILED BILLING REPORT  
PROFORMA #

(RUN 05/12/20 11:44 )  
THRU 07/31/19

-----  
CLIENT 180963 JAKSICK, WENDY  
MATTER 180963.00001 ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL  
MPRAC 1034  
MNAME 180963.00001  
-----  
LAST DATE BILLED  
DATE BILLED THRU  
LAST PYMENT DATE  
-----  
FEES and DISB

NOTES		
Date	Index	Description
07/16/18	229357	No monthly invoices should be generated for this matter. All costs to be advanced and reconciled upon conclusion. Co-counsel Zachary E. Johnson of Spencer & Johnson, PLLC (FKA Spencer Law PC) should receive a copy of any invoice generated at the conclusion of this matter.

FOX ROTHSCHILD LLP  
DETAILED BILLING SUMMARY

B/ATTY LOC: 71 LAS VEGAS

BILLING ATTORNEY: 3071 MARK J. CONNOT  
CLIENT # 180963 JAKSICK, WENDY

THRU 07/31/19

\* \* \* \* \* M A T T E R S U M M A R Y \* \* \* \*

-----  
-a5L -a14E -(s015H

MATTER NUMBER	BILLED HOURS TOTAL	BILLED FEES AMOUNT DUE	PREVIOUS INTERIM BILLING	NET FEES TO BILL	ENTER FEES TO BILL	UNALLOCATED RETAINER	DISB AMOUNT DUE	ENTER DISB TO BILL
180963.00001	1462.50	719,323.50	.00	719,323.50 !	!	.00	97,662.56 !	!
ADV. TODD B. JAKSICK AND MICHAEL S. KIMMEL RESP. ATTY: 3071								
1462.50	719,323.50	.00	719,323.50	.00	97,662.56			

FOX ROTHSCHILD LLP  
DETAILED BILLING SUMMARY

~a5L ~a14E ~{s015H  
B/ATTY LOC: 71 LAS VEGAS  
BILLING ATTORNEY: 3071 MARK J. CONNOT  
CLIENT # 180963 JAKSICK, WENDY

THRU 07/31/19

\* \* \* M A T T E R S U M M A R Y \* \* \*

~a5L ~a14E ~{s015H  
ADDRESS : WENDY JAKSICK  
4805 ATWORTH LANE  
MCKINNEY, TX 75070  
  
START DATE : 07/16/2018  
ORIG. ATTY : 3071  
  
! BILL TYPE - SELECT ONE:  
! ( ) REGULAR ( ) INTERIM ( ) FINAL  
!  
! BILL FORMAT/STYLE - SELECT ONE:  
! ( ) SYSTEM DEFAULT FORMAT  
! ( ) OR ENTER FORMAT-#: \_\_\_\_\_  
! ( ) I SENT BILL MANUALLY  
! ( ) HOLD FOR NEXT BILLING  
! A/R (ALL MATTERS) TO BE INCLUDED? TOTAL: .00  
! ( ) YES ( ) NO  
! -----

\* --- CURRENT STATUS --- \*  
  
FEES VALUE 719,323.50  
LESS UNALLOCATED .00  
LESS INTERIM .00  
TOTAL FEES 719,323.50  
  
TOTAL FEES & DISBURSEMENTS 816,986.06  
A/R BALANCE: .00

MARK J. CONNOT (10010)  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899 telephone  
(702) 597-5503 fax  
mconnot@foxrothschild.com

R. KEVIN SPENCER (*Admitted PHV*)  
Texas Bar Card No. 00786254  
ZACHARY E. JOHNSON (*Admitted PHV*)  
Texas Bar Card No. 24063978  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasprobate.com  
zach@dallasprobate.com  
*Attorneys for Respondent/Counter-Petitioner Wendy A. Jaksick*

**SECOND JUDICIAL DISTRICT COURT**

**WASHOE COUNTY, NEVADA**

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

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

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

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

WENDY JAKSICK,  
Respondent and Counter-Petitioner,

**DECLARATION OF R. KEVIN  
SPENCER**

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; AND STANLEY S. JAKSICK,  
INDIVIDUALLY AND AS CO-TRUSTEE OF  
THE SAMUEL S. JAKSICK, JR. FAMILY  
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.

//

//

1 I, R. KEVIN SPENCER, do hereby affirm under penalty of perjury that the assertions of  
2 this Declaration are true and based upon personal knowledge of the facts stated herein:

- 3 1. The team of attorneys who worked on this case were highly skilled, qualified, and  
4 sufficiently trained to merit the award. I am an attorney licensed to practice law in the  
5 states of Texas and admitted to practice in this case *pro hac vice*. Currently, the Principal  
6 Partner at the law firm Spencer & Johnson, PLLC and co-counsel in this action for  
7 Wendy Jaksick with Mark J. Connot. Mr. Connot and I shared responsibilities in  
8 formulating case strategies, deposing witnesses, and preparing for trial. I was involved  
9 in all aspects of the case including discovery, motion practice, and trial, among other  
10 things.  
11  
12 2. On April 1, 2020, the Court entered its *Judgment* and ordered the Trusts pay combined  
13 attorneys' fees of \$300,000.00 to Wendy's attorneys for prevailing on the claim against  
14 Todd for breach of fiduciary duties. From June 28, 2017 through July 31, 2019, Spencer  
15 & Johnson incurred a total of \$803,668.75 in fees for 1,760.25 hours billed in the above  
16 referenced case.  
17  
18 3. I am a litigator with more than 27 years of experience in the profession. My litigation  
19 practice has primarily been in state court focusing on probate, trust, guardianship and  
20 fiduciary litigation. My education, work history, and other background information  
21 including speeches, papers and accolades are included in my *Curriculum Vitae* attached  
22 hereto as Exhibit "1".  
23  
24 4. My hourly rate on this matter was \$550.00 and billed 664.00 hours through July 31,  
25 2019. *A true and correct copy of my Detailed Billing Report is attached hereto as Exhibit*  
26 *"2"*. I primarily worked on deposing witnesses, formulating a case strategy, arguing at  
27  
28

1 hearings, preparing and approving pleadings and preparing and representing Wendy at  
2 trial.

3 5. Zachary E. Johnson was an associate who became a Partner at Spencer & Johnson,  
4 PLLC during the pendency of the case. Mr. Johnson has been practicing for over ten  
5 (10) years. Mr. Johnson's education, work history and other background information is  
6 included in his *Curriculum Vitae* attached hereto as Exhibit "3". Mr. Johnson's hourly  
7 rate is \$425.00, and he billed 944.75 hours through July 31, 2019. Mr. Johnson primarily  
8 worked on conducting research, drafting pleadings and discovery, participating in  
9 discovery hearings, formulating case strategy, and preparing for trial.

10 6. As shown in Exhibit "2", all other individuals participated less than seventy (75) hours  
11 on the matter. The entire Spencer & Johnson, PLLC litigation team is skilled,  
12 experienced, and holds a high standing in the legal community. Therefore, the Court's  
13 award is warranted and more than reasonable under the circumstances.

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

16 DATED this 12<sup>th</sup> day of May, 2020.

17  
18  
19  
20  
21 R. KEVIN SPENCER  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT 1

# EXHIBIT 1



**R. Kevin Spencer**  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
(214) 965-9999  
(214) 965-9500 - Fax  
kevin@dallasprobate.com

**EDUCATION:**

THE UNIVERSITY OF SOUTH DAKOTA – SCHOOL OF LAW, Vermillion, SD – Juris Doctorate, 1992  
AUSTIN COLLEGE, Sherman, TX – B.A. in Business and B.A. in Psychology, 1989  
CISTERCIAN PREPARATORY SCHOOL, Irving, TX – High School Diploma – 1985

**PROFESSIONAL BACKGROUND:**

PRINCIPAL, SPENCER & JOHNSON, PLLC – January 1, 2018 – Present  
PRINCIPAL, SPENCER LAW, P.C., Dallas, Texas – September 1, 2011 – December 31, 2018  
PRINCIPAL, SPENCER & WATERBURY, L.L.P., Dallas, Texas – Sept. 1, 2007 – Aug. 31, 2011  
PARTNER, THE HARTNETT LAW FIRM, Dallas, Texas – Jan. 1, 2001 – Aug. 31, 2007  
ASSOCIATE, THE HARTNETT LAW FIRM, Dallas, Texas – Aug. 1, 1992 – Dec. 31, 2000

Licensed to practice law by the State Bar of Texas, May 7, 1993

**CERTIFICATIONS:**

Mediator – Certified – November 2012  
Certified, Guardianships/Attorney Ad Litem

**HONORS/RECOGNITIONS:**

Martindale-Hubbell – AV Rated, September 2003 – Present  
Listed in Bar Register of Preeminent Lawyers – Trusts and Estates Section – 2011 – Present  
Texas Super-Lawyer – Estate and Trust Litigation – Texas Monthly Magazine – 2011 – Present  
Texas Rising Star (Best Lawyers in Texas Under 40), Texas Monthly – 2004, 2005, 2007  
Best Lawyers in Dallas Under 40 – D-Magazine – May 2006

**PRACTICE AND BIOGRAPHICAL INFORMATION:**

As the Principal and Owner of SPENCER LAW, P.C., Kevin practices in litigation and appeals in all Texas Courts with a focus on all aspects of probate, trust, fiduciary and guardianship litigation and estate administration, including will contests, trusts contests, guardianship contests, fiduciary liability, as well as ancillary probate jurisdiction litigation, heirship and paternity-inheritance disputes, post-death common-law spouse disputes, civil litigation and civil appeals.

**LAW RELATED SPEECHES & PUBLICATIONS:**

**AUTHOR/SPEAKER:**

ADVANCED ESTATE PLANNING & PROBATE – 43<sup>rd</sup> Annual – San Antonio, Texas – June 19, 2019  
Topic: Attorney Disqualification – An Ethical Quandary

LAW REVIEW ARTICLE (PUBLISHED):

TEXAS TECH ESTATE PLANNING & COMMUNITY PROPERTY LAW JOURNAL

Topic: Good Estate Planning Process: A Panacea for Litigation

Cite: 11 TEX. TECH EST. PLAN. COM. PROP. L.J. 137-150 (February 2019).

LAW REVIEW ARTICLE (PUBLISHED):

TEXAS TECH ESTATE PLANNING & COMMUNITY PROPERTY LAW JOURNAL

Topic: Standing and Error Correction in Probate

Cite: TEX. TECH EST. PLAN. & COM. PROP. L. J., VOL. 10, NO. 1 (Summer 2018).

AUTHOR/SPEAKER:

ADVANCED ESTATE PLANNING & PROBATE – 42<sup>nd</sup> Annual – Dallas, Texas – June 15, 2018

Topic: What Planners Need to Know About Defending the Estate Plan

AUTHOR/SPEAKER:

FPA – DFW ANNUAL CONFERENCE – Irving Convention Center – May 17, 2018

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

CORPUS CHRISTI ESTATE PLANNING SEMINAR – Corpus Christi, Texas – May 11, 2018

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

BOK FINANCIAL – TRUST EDUCATION PROGRAM, Dallas, Texas – March 22, 2018

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

KEN STREET LAW SYMPOSIUM AT AUSTIN COLLEGE – Sherman, Texas – Feb. 12, 2018

Topic: Social Media, Millennials and the Vanishing Jury Trial: Issues of the 2018 Trial Lawyer

AUTHOR/SPEAKER:

ADVANCED FAMILY LAW COURSE – San Antonio, Texas – August 10, 2017

Topic: Estates Code and Estate Planning Issues Affecting Your Family Law Practice

AUTHOR/SPEAKER:

DALLAS BAR ASSOCIATION – FAMILY LAW SECTION – Dallas, Texas – March 8, 2017

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

FIDUCIARY LITIGATION SEMINAR – Houston, Texas – December 1-2, 2016

Topic: It's Not Over Yet! Resignation, Removal & Successor Fiduciaries

AUTHOR/SPEAKER:

DENTON COUNTY PROBATE BAR – Denton, Texas, November 4, 2016

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

AMARILLO AREA PROBATE BAR – Amarillo, Texas, September 23, 2016

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

COLLIN COUNTY PROBATE BAR – McKinney, Texas, April 8, 2016

Topic: Estate (Planning) Litigation Pointers: A Litigator's Perspective

AUTHOR/SPEAKER:

ADVANCED FAMILY LAW COURSE – San Antonio, Texas, August 6-9, 2007

Topic: (Family vs.) Probate Regarding Children – August 8, 2007

AUTHOR/SPEAKER:

PROBATE LITIGATION SEMINAR – Fort Worth, Texas – September 17, 2004

Topic: Bill of Review and Error Correction in Probate

AUTHOR/SPEAKER:

THE TAFLS TRIAL INSTITUTE – New Orleans, Louisiana – January 15-17, 2004

(Texas Academy of Family Law Specialists)

Topic: Divorce and Trust Litigation: Can you trust the Trust?

AUTHOR:

“Probate Issues Affecting Divorce Attorneys and their Clients” – Family Law Forum Newsletter, Vol. 18, Issue 1, Texas Academy of Family Law Specialists, December 2002

**AUTHOR/SPEAKER:**

ADVANCED FAMILY LAW COURSE – Dallas, August 5-8, 2002

Topic: Probate: Dead or Alive, We will be Splitting the Estate, and Other Cross-Over  
Issues – August 6, 2002

**SPEAKER:**

HOW TO OFFER & EXCLUDE EVIDENCE SEMINAR – Houston, Texas

Topic: Self-Proving Evidence – February 9, 2001

**ASSOCIATIONS/ACTIVITIES:**

Texas State Bar - 1993

State Bar CLE Planning Committee Member – Advanced Estate Planning Seminar – 2017-2018

Committee Member – Dallas Bar Association – Probate Section – 2016, 2017, 2018, 2019

- Treasurer – 2019

- Program Chair – 2018

Dallas Bar Association:

Section Member:

- Probate Section

- Trial Skills Section

- Family Law Section

- Appellate Section

- Alternative Dispute Resolution Section

Texas Trial Lawyers Association – 2013, 2015 & 2016

Dallas Trial Lawyers Association, 2016

Mentor, UNT College of Law – L.A. Bedford Mentor Program– Dallas – 2016, 2017

Member, College of the State Bar of Texas – 2007, 2008

Sustaining Life Fellow, Dallas Association of Young Lawyers (“DAYL”) Foundation

DAYL – Leadership Class – Class of 2002

Attorney, Dallas Volunteer Attorney Program

President, Cistercian Preparatory School Alumni Association, 1998-2002

# EXHIBIT 2

# EXHIBIT 2

# SPENCER & JOHNSON, PLLC

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

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

Statement Date: May 12, 2020  
Statement No. 4988  
Account No. 2645.00  
Page: 1

Estate of Samuel S. Jaksick, Jr.

DRAFT

## FEES

			<u>Hours</u>	
06/28/2017	RKS	PC w/ Wendy Jaksick re: [REDACTED]	1.00	550.00
06/30/2017	ZEJ	Meeting with Wendy Jaksick re: [REDACTED]	1.50	637.50
	BPH	Meeting w/ Wendy Jaksick re: [REDACTED]	1.50	525.00
	RKS	Meeting with Wendy Jaksick re: [REDACTED]	1.50	825.00
07/07/2017	RKS	PC w/ Wendy Jaksick & Jim Hartnett, Jr. re: [REDACTED]	1.00	550.00
07/20/2017	JCC	Began reviewing file with 200 plus scanned documents and organizing for file and on computer.	1.00	150.00
07/28/2017	BPH	PC w/ Wendy Jaksick and ZEJ re: [REDACTED]	0.25	87.50
	ZEJ	PC with Wendy Jaksick re: [REDACTED]		
		[REDACTED] Finalized and emailed proposed Fee Agreement; Reviewed email correspondence of RKS with Wendy Jaksick's Nevada counsel; Emailed Joshua Hood at Solomon M. Hood re: copy of Wendy Jaksick file and current pleadings	1.75	743.75
07/31/2017	ZEJ	PC with Wendy Jaksick re: [REDACTED]	0.75	318.75
08/07/2017	ZEJ	Reviewed and saved documents from Donald Lattin and accompanying documents to the system	0.25	106.25
08/09/2017	ZEJ	Exchanged emails with Wendy Jaksick scheduling conference call with RKS	0.25	106.25
08/10/2017	ZEJ	PC with Wendy Jaksick re: [REDACTED]		
		[REDACTED] Began review of Petitions filed in Nevada and Nevada law concerning Trust accountings; Calendared deadline to file objection to Accountings	1.50	637.50
08/11/2017	ZEJ	Exchanged emails with Wendy Jaksick re: [REDACTED]		
		PC with Stan Jaksick re: [REDACTED]	1.25	531.25

TJA 003290

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 2

			Hours	
08/21/2017	ZEJ	PC with Wendy Jaksick and RKS re: [REDACTED]	0.25	106.25
	RKS	PC w/ Wendy re: [REDACTED]	1.00	550.00
08/28/2017	ZEJ	Continue work drafting demand letter to Todd Jaksick re: various issues related to the Trust; Reviewed and responded to email from Wendy Jaksick	0.25	106.25
09/06/2017	RKS	Reviewing documents in preparation of letter demanding distribution from Family Trust.	0.50	275.00
09/15/2017	ZEJ	Reviewing documents and preparing memo for preparation of demand letter	1.25	531.25
09/18/2017	ZEJ	Conferred with RKS re: [REDACTED] Reviewed Trusts associated documents	1.25	531.25
	RKS	Conferred with ZEJ re: [REDACTED] Reviewed Trusts associated documents	1.00	550.00
09/20/2017	ZEJ	PC with Richard Whelan re: Wendy Jaksick, the trusts and other issues	0.75	318.75
09/29/2017	RKS	PC w/ Rich Whelan re: setting up conference call on Monday.	0.25	137.50
10/02/2017	ZEJ	PC with Wendy Jaksick, Rich Whelan and RKS re: update, issues and strategy moving forward	1.25	531.25
	RKS	PC with Wendy Jaksick, Rich Whelan and ZEJ re: update, issues and strategy moving forward	1.25	687.50
10/03/2017	ZEJ	PC with Robert LeGoy and RKS re: receipt of Demand letters, introduction and discussion of intention moving forward	0.50	212.50
	RKS	PC with Robert LeGoy and ZEJ re: receipt of Demand letters, introduction and discussion of intention moving forward	0.50	275.00
10/05/2017	ZEJ	Reviewed emails between RKS and Mark Cannot re: [REDACTED] Began work on Answer to the Petitions for Approval of Accountings	1.00	425.00
10/06/2017	ZEJ	Conferred with KEG re: [REDACTED] Emailed Mark Cannot re: [REDACTED]	0.25	106.25
10/08/2017	ZEJ	Prepared draft Answer in response to the Petition in the SSJ Family Trust lawsuit	3.25	1,381.25
10/09/2017	BPH	Conferred w/ RKS and ZEJ re: [REDACTED]	0.50	175.00
	ZEJ	Continued work to finalized draft Answers; Conferred with RKS re: [REDACTED] Exchanged emails with Wendy Jaksick re: [REDACTED] [REDACTED] PC with Philip Kreitlein re: representation of Stan Jaksick; Emailed draft answer to Mark Connot and RKS for review and discussion	3.50	1,487.50
	RKS	Conferred w/ ZEJ & BPH re: [REDACTED] E-mail to Keith Cable re: being local counsel in Nevada; E-mail to Mark Connot re: same and status of his conflicts check; PC w/ Phillip Kreitlein & ZEJ re: seeking a		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 3

			Hours	
		postponement of hearing and setting up conference call; E-mail re: setting up conference call; Began reviewing Answer to Accountings.	3.50	1,925.00
10/10/2017	ZEJ	Prepared and finalized answers and objections; PC with Rich Whelan re: status responses and other issues; Multiple PCs with Mark Connot and RKS re: same	4.25	1,806.25
	RKS	PC w/ Mark Connot re: [REDACTED] Reviewed and made changes to Answer in Family Trust case and in SSJ Issue Trust case; Conferred w/ ZEJ re: same; Numerous e-mails with Fox Rothschild re: same.	4.00	2,200.00
	KMC	Format of objection to petition	0.50	50.00
10/11/2017	ZEJ	PC with Mark Connot re: [REDACTED] Emailed Wendy and Rich Whalen re: same	0.25	106.25
	RKS	PC w/ Mark Connot re: [REDACTED]	0.25	137.50
10/23/2017	ZEJ	PC with Mark Cannot and RKS re: [REDACTED] Reviewed email from Mark Cannot re: [REDACTED] Emailed [REDACTED]	0.50	212.50
	RKS	PC with Mark Cannot and ZEJ re: [REDACTED] Reviewed email from Mark Cannot re: [REDACTED] Emailed [REDACTED]	0.50	275.00
10/26/2017	ZEJ	Emailed Mark Cannot re: [REDACTED] Emailed Mark Cannot re: [REDACTED] Reviewed Pro Hac Vice requirements and completed Pro Hac Vice Application	1.25	531.25
11/07/2017	ZEJ	Emailed Mark Connot re: [REDACTED] Conferred with BS re: [REDACTED]	0.25	106.25
11/08/2017	ZEJ	PC with Nevada Bar re: questions concerning Pro Hac Vice application; Conferred with RKS re: same	0.25	106.25
	BOS	Completed pro hac vice Application for Nevada	0.50	125.00
11/09/2017	ZEJ	Conferred with KC re: [REDACTED] PC (left message) for Mark Connot re: [REDACTED] PC with Wendy Jaksick and RKS re: [REDACTED]	1.25	531.25
	RKS	PC w/ Wendy, Rich Whelan & ZEJ re: additional recent actions taken by Todd; Prepared memo re: same.	1.25	687.50
11/10/2017	RKS	PC w/ Rich Whelan re: quick question about foreclosure and conflict of interest.	0.25	137.50
11/27/2017	ZEJ	Emailed Mark Cannot re: [REDACTED] Participated in Status Conference re: scheduling case management conference	0.25	106.25
	RKS	PC w/ Court and all attorneys re: setting trial scheduling conference.	0.50	275.00

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 4

			<u>Hours</u>	
11/29/2017	ZEJ	Conferred with RKS re: [REDACTED]	0.25	106.25
	RKS	Conference call with Mark Connot; [REDACTED]	1.00	550.00
12/04/2017	ZEJ	Emailed Mark Connot re: scheduling call	0.25	106.25
12/07/2017	ZEJ	Emailed Mark Connot re: [REDACTED]	0.25	106.25
12/08/2017	ZEJ	Conferred with RKS re: [REDACTED] Emailed Mark Connot re: same	0.25	106.25
12/15/2017	ZEJ	Emailed Mark Connot re: [REDACTED]	0.25	106.25
12/19/2017	ZEJ	Exchanged emails with Suzy Moore with State Bar of Nevada re: Applications for Admission Pro Hac Vice; Conferred with KC re: [REDACTED]	0.25	106.25
01/02/2018	ZEJ	Conferred with KC re: [REDACTED] Prepared Jury Demands in for filing in the Family Trust and SSJ's Issue Trust matters; Began drafting Complaint against Todd Jaksick, Michael S. Kimmel, Stanley S. Jaksick in their various capacities; Emailed Jury Demands for Mark Connot for review and filing; PC with Mark Connot and RKS re: [REDACTED]		
		[REDACTED] Reviewed Petitioners' Status Reports filed in the Family Trust and SSJ's Issue Trust matters	2.75	1,168.75
	RKS	PC w/ Mark Connot & ZEJ re: [REDACTED]	0.50	275.00
01/03/2018	ZEJ	Reviewed and prepared Responses to Petitioners' Status Reports filed in the Family Trust and Issue Trust matters; PC (left message) for Wendy Jaksick re: [REDACTED] Conferred with Mark Connot re: [REDACTED]		
		[REDACTED]	2.75	1,168.75
01/04/2018	ZEJ	Reviewed and responded to email from Wendy Jaksick re: [REDACTED] Conferred with RKS re: same; Emailed Mark Connot re: same; PC with Mark Connot re: [REDACTED] Conferred with RKS re: same	1.00	425.00
01/09/2018	ZEJ	PC with Wendy Jaksick re: [REDACTED]	1.00	425.00
01/12/2018	ZEJ	PC with Suzy Moore at Nevada State Bar re: Applications Pro Hac Vice; Emailed Suzy Moore re: withdrawing Applications in Cause No. PR17-00446 and proceeding on Applications in PR17-00445	0.25	106.25
01/14/2018	ZEJ	Reviewed Indemnification Agreements for Todd Jaksick and Stan Jaksick; Found and reviewed authority re: support for various causes of action against Plaintiffs; Continued working on draft Complaint	3.00	1,275.00
01/16/2018	ZEJ	Emailed Mark Connot re: Orders Consolidating Cases; Emailed Suzy Moore with the Nevada State Bar re: Orders Consolidating Cases; Continued work on lawsuit against Petitioners	4.25	1,806.25



Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 5

			Hours	
01/17/2018	ZEJ	Reviewed information and documents concerning potential claims; Continued work on lawsuit against Petitioners	6.50	2,762.50
01/18/2018	RKS	Extensive review and made changes to Facts portion of Petition.	2.00	1,100.00
	ZEJ	Continued work on Counter-Petition	10.25	4,356.25
01/19/2018	ZEJ	PC with Mark Connot and RKS re: [REDACTED] Multiple PCs with Wendy Jaksick re: [REDACTED] Multiple emails with Mark Connot re: [REDACTED] Finalized Counter-Petition for filing; Emailed Wendy Jaksick re: [REDACTED]	5.75	2,443.75
01/24/2018	ZEJ	Reviewed proposed Scheduling Order prepare and circulated by counsel for Stanley Jaksick; Reviewed Nevada rules re: discovery; Conferred with KS re: [REDACTED] Emailed Suzy Moore with the Nevada State Bar re: obtaining refund of fees for the Pro Hac Vice application that were withdrawn	0.75	318.75
02/08/2018	ZEJ	Reviewed emails from Wendy Jaksick re: Motion to Dismiss; Emailed Wendy Jaksick re: Motion to Dismiss; Emailed Mark Connot re: Motion to Dismiss	0.25	106.25
02/15/2018	ZEJ	Collected signatures of Sam Jaksick; Emailed Wendy Jaksick re: [REDACTED] Found and reviewed authority re: no contest provisions and the Motion to Dismiss for alleged violation of the No Contest provision	1.75	743.75
02/16/2018	ZEJ	PC (left message) for Wendy Jaksick re: [REDACTED] signatures	0.25	106.25
	KMC	Located and prepared examples of Decedent's signature for handwriting expert examination.	2.00	200.00
	ZEJ	Continued work on Response to Motion to Dismiss; Exchanged emails with Wendy Jaksick re: same	2.50	1,062.50
02/18/2018	ZEJ	Continued work on Response to Motion to Dismiss; Exchanged emails with Wendy Jaksick re: same	6.50	2,762.50
02/19/2018	BPH	Conferred w/ ZEJ re: [REDACTED]	0.25	87.50
	ZEJ	Prepared First Amended Counter-Petition; Exchanged emails with Mark Connot re: same; Continued work on Response to Motion to Dismiss; Exchanged emails with Wendy Jaksick re: same	13.50	5,737.50
02/20/2018	ZEJ	Continued work on Response to Motion to Dismiss; Finalized First Amended Counter-Petitioner; Exchanged emails with Mark Connot, Doreen and RKS re: [REDACTED] Exchanged emails with Wendy Jaksick re: [REDACTED]	6.00	2,550.00
	RKS	Prepared declaratory judgment section of Petition; Conferred w/ ZEJ re: same and [REDACTED]	2.25	1,237.50
02/21/2018	ZEJ	Emailed Petitioners' Initial Disclosures to Wendy Jaksick and requested information for her Initial Disclosures; Exchanged emails with Wendy Jaksick re: [REDACTED] Reviewed documents and created "Hot Documentets" folder	0.75	318.75

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 6

			<u>Hours</u>	
02/22/2018	ZEJ	Continued work on Response to Motion to Dismiss	2.25	956.25
02/23/2018	ZEJ	Continued work on Response to Motion to Dismiss; Exchanged emails with Wendy Jaksick re: [REDACTED] Conferred with RKS re: [REDACTED] Emailed First Amended Petition to Mark Connot for filing; PC with Mark Connot re: [REDACTED]	2.25	956.25
02/25/2018	RKS	Reviewed and made changes to Motion to Dismiss.	1.25	687.50
02/26/2018	ZEJ	Multiple emails and PCs with Wendy Jaksick re: [REDACTED] Conferred with RKS re: same; Finalized Response to Motion to Dismiss and Exhibits and emailed same to Mark Connot for filing	3.75	1,593.75
	RKS	Reviewed and made changes to Objections & Response to Motion to Dismiss; Reviewed and made changes to First Amended Counter-Petition.	3.50	1,925.00
03/01/2018	ZEJ	PC with Adam Hosmer-Henner, Mark Knobel, Mark Connot and RKS re: status of case	0.50	212.50
	BOS	CC w/ RKS & ZEJ	0.75	187.50
03/05/2018	ZEJ	Reviewed and responded to email from Mark Connot re: [REDACTED] Drafted Initial Disclosures; Exchanged multiple emails with Wendy Jaksick re: [REDACTED] Reviewed documents for inclusion in Initial Disclosures	2.50	1,062.50
03/06/2018	ZEJ	Conferred with RKS re: [REDACTED] Exchanged emails with Mark Connot and Kevin Spencer re: [REDACTED] Prepared Respondent's First Amended Objections and Response to Motion to Dismiss; Exchanged emails with Doreen Lofredo re: [REDACTED] PC with Mark Connot re: [REDACTED]	2.00	850.00
	KMC	Create Excel sheet for index of emails.	1.75	175.00
	RKS	Reviewed Status Conference Statement from opposing counsel; Drafted and sent e-mail to Mark Connot re: same.	0.75	412.50
03/07/2018	ZEJ	Conferred with RKS re: [REDACTED] PC with Mark Connot re: same	0.50	212.50
	RKS	Conferred with ZEJ re: [REDACTED] PC with Mark Connot re: same	0.50	275.00
03/08/2018	ZEJ	PC with Mark Connot re: [REDACTED] Finalized draft Initial Disclosures; Emailed Mark Connot and RKS re: same	1.75	743.75
03/09/2018	ZEJ	Finalize Initial Disclosures and emailed same to Wendy Jaksick for review; Reviewed numerous emails from Wendy Jaksick re: [REDACTED] Exchanged emails with Wendy Jaksick re: [REDACTED]	1.25	531.25
03/11/2018	ZEJ	Updated Initial Disclosures based on RKS comments; Emailed Wendy Jaksick		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 7

			<u>Hours</u>	
		same and questions re: [REDACTED]	0.25	106.25
03/12/2018	ZEJ	Exchanged emails with Mark Connot re: [REDACTED] Finalized and emailed Mark Connot Initial Disclosures; Reviewed minutes from Status Conference; Emailed same to Wendy Jaksick; Emailed Wendy Jaksick re: [REDACTED]	0.50	212.50
03/13/2018	BOS	PC w/ Mark Connot re: [REDACTED]	0.50	125.00
	RKS	Extensive review of proposed Protective Order; Sent e-mail to Mark Connot re: [REDACTED]; PC w/ Mark Connot re: same.	2.00	1,100.00
03/22/2018	ZEJ	Met courier to receive delivery of documents from Wendy Jaksick; Reviewed Requests for Production Served by Petitioners; Emailed Discovery Requests to Wendy Jaksick for review; Emailed Mark Connot re: [REDACTED]	0.25	106.25
03/25/2018	ZEJ	Reviewed and prepared documents identified in Initial Disclosures for Production; Multiple emails with Wendy Jaksick re: same	3.25	1,381.25
03/26/2018	KMC	Prepared documents for production; drafted letter to Counsel for attorney review.	2.50	250.00
	ZEJ	Finalized and served production of document identified in Respondent's Initial Disclosures	1.00	425.00
04/02/2018	ZEJ	PC with RKS and Mark Connot re: [REDACTED]	0.50	212.50
	BOS	Mark Connott - re: [REDACTED] (W/ RKS & ZEJ)	0.75	187.50
	RKS	PC w/ Mark Connot & ZEJ re: [REDACTED]	0.50	275.00
04/10/2018	KMC	Prepared documents for production.	0.75	75.00
04/11/2018	ZEJ	Reviewed Requests for Production; Reviewed rules related to timing of responses to request for production; Emailed Doreen Loffredo and Mark Connot re: [REDACTED] Conferred with AH re: [REDACTED] Emailed Wendy Jaksick re: [REDACTED]	0.75	318.75
04/12/2018	ZEJ	Reviewed First Request for Production to Wendy Jaksick; Prepared Wendy Jaksick's Response to First Request for Production; Prepared forms for Wendy Jaksick's Objections and Responses to Todd Jaksick's Second, Third and Fourth Requests for Production; Conferred with AH re: [REDACTED] Reviewed Notice of Wendy Jaksick's deposition; Emailed Wendy Jaksick re: same; PC with Mark Connot re: [REDACTED] Began drafting Request for Production to Todd Jaksick	1.50	637.50
	KMC	Prepared Responses to Requests for Production for attorney review (questions).	2.50	250.00
04/16/2018	ZEJ	Emailed Mark Connot, Doreen Loffredo and RKS re: [REDACTED] Meeting with Wendy Jaksick to print her emails for production	0.75	318.75

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 8

			<u>Hours</u>	
	RKS	Conferred w/ Wendy & ZEJ re: [REDACTED]	0.25	137.50
04/17/2018	ZEJ	Reviewed and responded to email from Mark Connot re: [REDACTED] [REDACTED]	0.25	106.25
04/24/2018	ZEJ	Finalized and emailed First Amended Initial Disclosures to Mark Connot and Doreen Leffredo for review; Reviewed Requests for Production and reviewed documents provided by Wendy Jaksick in preparation for production; Reviewed correspondence from Donald Lattin re: demand concerning privileged documents produced by Wendy Jaksick; Emailed Wendy Jaksick re: [REDACTED] Emailed MC and RKS re: [REDACTED]	5.25	2,231.25
04/25/2018	ZEJ	Review documents in preparation for production; Met with Bernard Stiggers to deliver documents and plan document production	4.75	2,018.75
04/26/2018	ZEJ	Meeting with Wendy Jaksick re: [REDACTED] Trip to Pinnacle Documents Solutions to deliver additional documents and meet with Bernard Stiggers re: document production; Continued work with Wendy Jaksick to access her email accounts to obtain responsive emails for production; Converted emails to PST and email Bernard Stiggers re: need to prepare for review and production Continued work on document production; Began drafting Objections and Responses to Second Request for Production to Wendy Jaksick; Multiple email exchanges with Wendy Jaksick re: same and issues with same	6.00	2,550.00
04/27/2018	ZEJ	Continued work on Objections and Responses to Second and Third Request for Production; PC with Mark Connot re: [REDACTED] [REDACTED] Continued review and preparation of documents for production; Exchanged emails with Wendy Jaksick re: same; Exchanged emails with Bernard Stiggers with Pinnacle Services re: document production issues; Emailed Joshua Hood, Wendy's prior Nevada counsel, re: Wendy Jaksick's file; Continued work on Objections and Responses to Second Request for Production; Exchanged emails with Jaime Villa with Pinnacle Services re: review and production issues; Reviewed emails returned by Jaime Villa in preparation for production	5.75	2,443.75
04/28/2018	ZEJ	Reviewed emails in preparation for production; Conferred with RKS re: [REDACTED] Finalized and emailed final documents to Panicle to finalize production	4.50	1,912.50
	BPH	PC w/ ZEJ re: [REDACTED]	0.25	87.50
04/29/2018	ZEJ	Continued review of documents in preparation for production; Finalized draft Responses and Objections to Fourth Request for Production; Exchanged emailed with Wendy Jaksick and RKS re: [REDACTED]	6.25	2,656.25
04/30/2018	BPH	Conferred w/ ZEJ re: [REDACTED] Conferred w/ RKS and ZEJ re: [REDACTED]	0.50	175.00
	ZEJ	Exchanged multiple emails with Wendy Jaksick re: [REDACTED] [REDACTED] Conferred with RKS re: [REDACTED] [REDACTED] Finalized and served Responses to Second, Third and		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 9

			<u>Hours</u>	
		Fourth Requests for Production	5.75	2,443.75
05/04/2018	ZEJ	PC with Mark Connot, RKS and BOS re: [REDACTED] PC with Adam Hosmer-Henner re: production, privilege and other issues	1.50	637.50
	RKS	PC w/ Mark Connot & ZEJ re: [REDACTED]	0.75	412.50
	BOS	PC w/ Mark Connot & RKS & ZEJ re: [REDACTED]	1.00	250.00
05/07/2018	ZEJ	PC with Mark Connot re: [REDACTED] Reviewed and Mark Connot proposed brief; PCs with Mark Connot re: same	1.00	425.00
05/09/2018	ZEJ	PC with Adam Hosmer-Henner re: issues between Wendy Jaksick and Stan Jaksick; Emailed RKS and Mark Connot re: [REDACTED]	0.50	212.50
05/10/2018	ZEJ	Continued work on Requests for Production to Todd Jaksick	1.50	637.50
05/14/2018	ZEJ	Reviewed Mark Connot's email re: [REDACTED] Emailed Mark Connot availability through September for depositions; Reviewed and responded to email from Wendy re: [REDACTED] Continued work on Wendy's Second and Third Request for Production to Todd Jaksick	3.50	1,487.50
05/22/2018	ZEJ	Emailed Mark Connot, RKS and Doreen Loffredo re: [REDACTED]	0.25	106.25
05/23/2018	ZEJ	Continued work on Respondent Wendy A. Jaksick's Objections and Responses to Todd Jaksick's First Set of Interrogatories to Wendy Jaksick	3.75	1,593.75
05/24/2018	ZEJ	Continued work on Responses to Requests for Interrogatories	6.00	2,550.00
05/25/2018	ZEJ	Continued work on Responses to Requests for Interrogatories; PC with Wendy Jaksick re: [REDACTED] Emailed Draft Response to Interrogatories to Mark Connot and Wendy Jaksick re: [REDACTED] PC with Mark Connot re: [REDACTED] Finalized Responses to Interrogatories; CC with all attorneys re: objections to 36(b) Notices; Conferred with RKS re: [REDACTED] Emailed final Responses to Interrogatories to Mark Connot, Doreen Lofredo and Wendy Jaksick for review and service	5.75	2,443.75
	BOS	CC re: [REDACTED]; Conversation w/ RKS and ZEJ re: [REDACTED]	0.50	125.00
05/30/2018	RKS	Various e-mails between ZEJ & Mark Connot re: [REDACTED] Searched and made hotel reservations in Reno for next week.	1.00	550.00
05/31/2018	RKS	Conferred w/ ZEJ re: [REDACTED]	0.25	137.50
06/01/2018	ZEJ	Exchanged emails with Wendy Jaksick re: [REDACTED] PC with Wendy Jaksick preparing her for her deposition	1.75	743.75

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 10

			Hours	
06/03/2018	RKS	Travel to Reno to attend/defend Wendy's depo and hearing on Monday	8.00	4,400.00
	RKS	attend/defend Wendy's deposition.	5.50	3,025.00
	ZEJ	Travel to Reno, Nevada with RKS; Meeting with Wendy Jaksick re: [REDACTED]	6.25	2,656.25
06/04/2018	RKS	Meeting w/ Wendy; Attended/defended Wendy's deposition.	9.00	4,950.00
	ZEJ	Meeting with Mark Connot and RKS re: [REDACTED] [REDACTED] Court appearance in front of Discovery Judge for hearing on disputes concerning 30(6)(b) depositions; Lunch with Mark Connot, RKS and Wendy Jaksick for deposition prep; Attended Wendy Jaksick's half day of deposition; Copies deposition exhibits at Kinkos; Dinner with Mark Connot and RKS re: [REDACTED]	11.00	4,675.00
06/05/2018	RKS	Meeting w/ Wendy; Attended/defended Wendy's deposition.	9.00	4,950.00
	ZEJ	Meeting with Wendy Jaksick and Mark Connot re: [REDACTED] Attended Wendy Jaksick deposition; Attended meeting with Adam Hossimer, Phil Krietlen, Mark Connot and RKS re: settlement negotiations; Dinner with Mark Connot and RKS to discuss Wendy Jaksick deposition and settlement negotiations	10.50	4,462.50
06/06/2018	RKS	Attended/defended Wendy's deposition; Return trip from Reno to DFW	12.00	6,600.00
	ZEJ	Appeared at Wendy Jaksick Deposition; Travel home from Reno, Nevada	7.00	2,975.00
06/07/2018	BPH	Conferred w/ ZEJ re: [REDACTED]	0.25	87.50
	ZEJ	Reviewed and made notes concerning the proposed Settlement Agreement emailed by Stan Jaksick's counsel on 05-24-2018	0.25	106.25
	RKS	Conferred w/ ZEJ re: [REDACTED] Ph. conf. w/ Mark re: same, Wendy's deposition and settlement issues; Ph. conf. w/ Adam Hosmer-Henner, Phil Kreitlein, Mark & ZEJ re: same.	1.50	825.00
06/08/2018	ZEJ	Reviewed and updated proposed subpoena requests to Bob LeGoy and Maupin Cox; Emailed same to Mark Connot and Doreen Loffredo for review and to prepare and serve the subpoena(s); CC with all counsel re: scheduling issues; PC with Mark Connot re: [REDACTED] [REDACTED] PC with RKS re: [REDACTED] [REDACTED] PC (left message) for Wendy Jaksick re: [REDACTED] [REDACTED] Text message to Wendy Jaksick re: same	2.75	1,168.75
06/13/2018	ZEJ	Prepared for and attended meet and confer conference call re: discovery issues; PC with Mark Connot re: same; Reviewed Case Statement Prepared by Mark Connot for the 06-14-2018 Discovery Hearing; Conferred with RKS re: same; PC with Mark Connot re: [REDACTED] Calendar various deposition dates	1.50	637.50
06/14/2018	ZEJ	Reviewed files to confirm deletion of emails/texts in accordance with Court's Order	0.25	106.25
	ZEJ	Court appearance (by phone) for discovery conference with Discovery Judge concerning current discovery disputes; CP with Mark Connot re: [REDACTED]	1.50	637.50
06/15/2018	ZEJ	Prepared and sent email to Ron Sinai and Wendy Jaksick with information concerning lawsuit and damage claims	0.50	212.50

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 11

			<u>Hours</u>	
06/18/2018	ZEJ	Emailed Wendy Jaksick her deposition transcripts for review; Conferred with RKS re: [REDACTED]	0.25	106.25
06/20/2018	RKS	PC w/ Mark Connot re: [REDACTED] Reviewed and made suggested changes to Mark's version of tolling agreement for such claims, if we dismiss them against Mr. Kimmel.	1.00	550.00
06/21/2018	ZEJ	Reviewed and responded to email from Mark Connot re: [REDACTED]	0.25	106.25
06/22/2018	ZEJ	Reviewed and responded to email from Matt Reason re: [REDACTED]	0.25	106.25
06/25/2018	ZEJ	PC with Max Schmidt re: [REDACTED]	0.50	212.50
06/28/2018	ZEJ	Download, reviewed and saved Todd's Responses to Production	0.25	106.25
07/05/2018	ZEJ	PC with Mark Connot re: deposition of Michael Kimmel	0.25	106.25
07/06/2018	ZEJ	Reviewed email from Max Schmidt re: [REDACTED]; Reviewed email from Wendy Jaksick re: [REDACTED] Emailed Mark Connot re: [REDACTED]	0.25	106.25
07/09/2018	ZEJ	PC with Max Schmidt and Max Volsky re: [REDACTED]	0.50	212.50
07/12/2018	ZEJ	[REDACTED] Exchanged emails with Wendy Jaksick re: same; Conferred with RKS re: same: PC with Wendy Jaksick re: [REDACTED]	2.50	1,062.50
07/13/2018	ZEJ	Reviewed Wendy Jaksick's notes and proposed changes to Volume II of her deposition	1.00	425.00
07/16/2018	ZEJ	PC with Wendy Jaksick re: [REDACTED]	0.25	106.25
07/17/2018	ZEJ	Conference call with Mark Connot and RKS re: [REDACTED] PC with Mark Connot re: [REDACTED] Conferred with RKS re: [REDACTED]	0.75	318.75
	BOS	CC w/ Mark Connot re: [REDACTED]	0.75	187.50
	RKS	Made airline and hotel reservations for 3 trips to Reno in August.	1.00	550.00
07/18/2018	ZEJ	PC with Wendy Jaksick re: [REDACTED] [REDACTED] Prepared draft Agreement and Promissory Note	0.75	318.75
	RKS	Conferred w/ ZEJ re: [REDACTED] [REDACTED] PC w/ Blackstone Holdings, Inc. & ZEJ re: [REDACTED]	0.75	412.50
07/19/2018	ZEJ	Exchanged emails with Wendy Jaksick re: [REDACTED]	0.25	106.25
07/27/2018	ZEJ	Reviewed Todd's various Responses to Requests for Production; Prepared		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 12

			Hours	
		correspondence to Don Lattin re: deficiencies in responses and production; PC with Mark Connot re: [REDACTED] [REDACTED] [REDACTED]	0.75	318.75
07/29/2018	ZEJ	Updated draft letter to Don Latin and Ken Robinson re: Todd Jaksick's responses to Requests for Production and Todd Jaksick's production; Emailed same to RKS Mark Connot for review and comment; Prepared Subpoena to obtain records from Pierre A. Hascheff; Updated Subpoena to Obtain records from Robert Legoy and Maupin, Cox & Legoy; Emailed Subpoenas to Mark Connot and Doreen Loffredo to review and finalize; Exchanged emails with Wendy Jaksick re: [REDACTED] [REDACTED]	3.75	1,593.75
07/30/2018	ZEJ	Searched and obtained contact information for Nanette J. Childers; Prepared Notary Demand to Nanette J. Childers; Prepared First Request for Production to Kevin Riley; PC with Mark Connot re: [REDACTED] [REDACTED] Finalized and sent correspondence to Bob LeGoy and Kent Robinson re: Todd's Responses to Production and document production; Continued work on review of Todd Jaksick's production and work on case chronology	4.50	1,912.50
08/02/2018	ZEJ	Reviewed Petitioners' Production and continued work on Case Chronology	5.00	2,125.00
08/05/2018	RKS	Travel to Reno for Stan Jaksick depositions	8.00	4,400.00
	ZEJ	Continued document review and work on case Chronology in preparation for Stan Jaksick's and Todd Jaksick's depositions	3.75	1,593.75
08/06/2018	RKS	Attended deposition of Stanley Jaksick in Reno, NV	9.00	4,950.00
	ZEJ	Continued document review and work on case Chronology in preparation for Stan Jaksick's and Todd Jaksick's depositions	13.00	5,525.00
08/07/2018	RKS	Attended deposition of Stanley Jaksick; Prepared to take Stanley's deposition tomorrow.	12.00	6,600.00
	ZEJ	Finalized preparations for Stan Jaksick's deposition; Travel to Reno for Stan Jaksick's deposition	14.00	5,950.00
08/08/2018	RKS	Attended and took deposition of Stanley Jaksick.	11.00	6,050.00
	ZEJ	Appeared for Stan Jaksick's Deposition by RKS	11.00	4,675.00
08/09/2018	RKS	Return travel from Reno, NV to DFW.	8.00	4,400.00
	ZEJ	Meeting with Wendy Jaksick to prepare for the continuation of her deposition; Appeared and defended Wendy Jaksick's deposition	10.00	4,250.00
08/10/2018	ZEJ	Meeting with Wendy Jaksick to prepare for the continuation of her deposition; Appeared and defended Wendy Jaksick's deposition; Return Travel to Dallas	9.50	4,037.50
08/12/2018	RKS	Travel to Reno for Todd Jaksick's deposition.	8.00	4,400.00
08/13/2018	RKS	Attended deposition of Todd Jaksick; Extensive review of documents in preparation for taking Todd's deposition.	15.00	8,250.00



Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 13

			<u>Hours</u>	
08/14/2018	ZEJ	Prepared information to Subpoena records from Dr. Ronald Smith and Dr. David Cannom; Emailed Mark Connot, Doreen Loffredo and RKS re: same; Prepared documents for deposition of Todd Jaksick	2.75	1,168.75
	RKS	Attended the deposition of Todd Jaksick; Reviewing documents in preparation for taking Todd's deposition.	11.00	6,050.00
	ZEJ	Travel to Reno for Todd Jaksick's deposition	8.00	3,400.00
08/15/2018	RKS	Took the deposition of Todd Jaksick; Prepared for further deposition tomorrow.	11.00	6,050.00
	ZEJ	Prepared for and appeared for Todd Jaksick's deposition	10.00	4,250.00
08/16/2018	RKS	Took deposition of Todd Jaksick until it was terminated by his counsel; Effort to travel back to Dallas begun.	10.00	5,500.00
	ZEJ	Prepared for and appeared for Todd Jaksick's deposition; Met and conferred with Mark Connot and RKS re: [REDACTED] Drafted email to Kent Robinson and Bob LeGoy re: same	8.00	3,400.00
08/17/2018	RKS	Travel back from Reno to Dallas	10.00	5,500.00
	ZEJ	Travel to Dallas from Reno	10.00	4,250.00
08/20/2018	ZEJ	Reviewed Emergency Motion to Terminate or Limit Deposition and Request for Sanctions; Reviewed Authority re: same; Reviewed Objection to LeGoy Subpoena; Emailed Wendy Jaksick re: same	0.75	318.75
08/21/2018	ZEJ	Continued work on Response to Emergency Motion to Terminate Deposition and for Sanctions	2.00	850.00
08/22/2018	ZEJ	Continued work on Response to Emergency Motion to Terminate and for Sanctions. Motion to Compel and Counter-Motion for Sanctions	4.50	1,912.50
08/23/2018	ZEJ	Continued work on Response to Emergency Motion to Terminate and for Sanctions. Motion to Compel and Counter-Motion for Sanctions	4.00	1,700.00
08/24/2018	ZEJ	Finalized draft Response to Emergency Motion to Terminate and for Sanctions. Motion to Compel and Counter-Motion for Sanctions circulated to Mark Connot and RKS for review; Emailed Mark Connot and RKS re: [REDACTED]	1.00	425.00
	RKS	PC w/ Adam Hosmer re: asking whether we noticed Jessica Clayton's deposition or not and whether we are going to object to Pierre Hascheff's deposition on September 7, 2018.	0.25	137.50
08/29/2018	ZEJ	Made changes to Wendy's Response to Emergency Motion to Termination or Limit Deposition and Request for Sanctions, Motion to Compel and Counter Motion for Sanctions; Emailed same to Mark Connot and RKS fore review	1.25	531.25
08/30/2018	ZEJ	Prepared correspondence to Dr. Ronald Smith re: his response to Wendy Jaksick's Subpoena Duces Tecum; Emailed Doreen Loffredo re: [REDACTED] [REDACTED] PC with Mark Connot and RKS re: [REDACTED] [REDACTED]	1.25	531.25

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 14

			Hours	
09/04/2018	ZEJ	Prepared Subpoena to Jessica Clayton; Emailed same to Mark Connot and RKS for comments	1.25	531.25
09/05/2018	ZEJ	Finalized Jessica Clayton Subpoena; Emailed Doreen Loffredo re: [REDACTED]	0.50	212.50
09/06/2018	ZEJ	Prepared and emailed proposed Subpoena for Nanette Childers to Doreen Loffredo, MC and RKS; Prepared and emailed proposed First Set of Interrogatories to Stanley Jaksick, Individually and as Co-Trustee of the Family Trust	1.25	531.25
	BPH	Conferred w/ RKS and ZEJ re: [REDACTED]	0.25	87.50
09/10/2018	RKS	Conferred w/ ZEJ re: [REDACTED] Using Wendy's template, prepared deposition questions for Dave Jamieson; PC w/ Mark, his Associate, Kevin, ZEJ re: [REDACTED]	1.50	825.00
09/11/2018	ZEJ	PC (left message) for Todd Alexander re: need to discuss Pierre Hascheff's failure to respond to subpoena and upcoming deposition; PC with Mark Connot re: [REDACTED] PC with Don Lattin and RKS re: settlement negotiations and need to meet and confer re: compelling document production	0.75	318.75
09/12/2018	ZEJ	Prepared memo on status of production and discovery responses; Emailed Doreen Loffredo to confirm she did not receive any response or production to the Subpoena to Pierre Hascheff; Prepared and sent correspondence to Todd Alexander re: Pierre Hascheff's failure to respond to the Subpoena and request for call to discuss same and issues with upcoming deposition of Pierre Hascheff; Exchanged emails with Doreen Loffredo re: [REDACTED] Exchanged emails with Kent Robison re: scheduling meet and confer; Continued work on Motion to Extend Discovery Deadlines and Expert Witness Deadline	3.75	1,593.75
09/13/2018	ZEJ	Continued work on Motion to Extend Discovery and Expert Designation Deadline; Reviewed discovery in preparation for Meet and Confer with Don Lattin and Kent Robison; PC with Adam Hosmer-Henner re: upcoming depositions, PC with Mark Connot re: [REDACTED] Conference call for Meet and Confer with Kent Robison, Don Lattin and Mark Connot re: various discovery issues, discovery deadlines, trial and mediation	6.50	2,762.50
09/14/2018	ZEJ	Finalized and circulated draft of Emergency Motion for Extension of Discover and Expert Designation Deadlines; Attended Pierre Hascheff's deposition by telephone	6.50	2,762.50
09/18/2018	ZEJ	Finalized and finished draft Emergency Motion to Extend Discovery and Designation Deadlines; Emailed to Mark Connot and RKS for review	0.75	318.75
09/19/2018	ZEJ	Revised subpoenas to Jessica Clayton and Nanette Childers; Emailed MC, DL and RKS re: same	1.00	425.00
09/20/2018	ZEJ	Reviewed Mark Connot's changes to the Emergency Motion to Extend Discovery and Designation and Trial; Finalized 5th Request for Production to		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 15

			Hours	
		Todd Jaksick re: Pierre Hascheff's file; Emailed same to MC and DL for review and service; PC with MC re: [REDACTED] PC (left message) for Wendy Jaksick to update her on status of case	0.50	212.50
09/24/2018	ZEJ	PCs (left messages) for Yesenia Gallegos and Nancy Yaffe re: subpoenaing medical records from California	0.25	106.25
	JCC	Find landman to use in Reno	0.50	75.00
09/27/2018	ZEJ	Reviewed emails concerning Pierre Hascheff deposition; Calendared Pierre Hascheff Deposition	0.25	106.25
10/01/2018	ZEJ	Reviewed Todd Jaksick's production of documents from Pierre Hascheff; Conferred with RKS re: [REDACTED] Prepared Motion to Compel Production and Responses to Interrogatories to Todd Jaksick	1.25	531.25
10/02/2018	ZEJ	PC with Adam Hosmer-Henner re: status of lawsuit and pending issues; Continued work on Motion to Compel Production from Todd Jaksick, in his Various Capacities	1.50	637.50
10/03/2018	ZEJ	Continued work on Motion to Compel Production from Todd Jaksick; Reviewed proposed Petition to Remove Todd Jaksick as Co-Trustee of the Family Trust and Trustee of the Issues Trust; PC with MC and RKS re: [REDACTED]	1.00	425.00
	RKS	PC w/ Mark Connot & ZEJ re: [REDACTED]	0.75	412.50
10/08/2018	ZEJ	Reviewed Objections and Responses to Subopenas Duces Tecum to Jessica Clayton and Nanette Childers; PC with Kent Robison and Don Lattin re: meet and confer re: production in response to Subpoenas to Clayton and Childers	0.75	318.75
	ZEJ	Continued work on Motion to Compel Production from Todd Jaksick	3.25	1,381.25
10/09/2018	ZEJ	PC with MC re: [REDACTED] Conferred with RKS re: same; PC (voicemail) for Adam Hosmer-Henner; Emailed Adam Hosmer-Henner requesting a call; PC with Matt Reason from [REDACTED] Service; PC with Adam Hosmer-Henner re: Pierre Hascheff production and other issues; Conferred with RKS re: [REDACTED] Continued work on Motion to Compel Production from Todd Jaksick; Reviewed medical records from Dr. Ronald Smith	3.25	1,381.25
	BPH	Conferred w/ RKS and ZEJ re: motion to remove and share transfer discrepancies.	0.25	87.50
	RKS	Preparing draft of Motion to Redress and Remove Trustee.	5.50	3,025.00
10/10/2018	ZEJ	Finalized and emailed draft Motion to Compel Production to Mark Connot; PC with Mark Connot re: Pierre Hascheff deposition	1.25	531.25
	RKS	Working on Motion to Redress Breach of Trust and Motion to Remove; Reviewed and made changes to draft of email re: production of Hascheff's files.	6.00	3,300.00
10/11/2018	ZEJ	Reviewed MC's changes to Motion to Compel; Emailed MC re: same; PC with		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 16

			Hours	
		MC and RKS re: [REDACTED]		
		[REDACTED] Updated and made additional changes to the Motion to Compel	1.25	531.25
	BOS	PC w Mark, RKS and ZEJ	0.25	62.50
10/12/2018	ZEJ	Finalized Motion to Compel Production from Todd Jaksick; PC with Mark		
		Connot re: [REDACTED]	0.50	212.50
	RKS	Reviewed Motion to Compel; Made changes to same and sent to Mark & Doreen	1.50	825.00
10/15/2018	ZEJ	Reviewed and made redlined changes to the Reply to Motion to Extend Deadlines; Exchanged emails with MC and DL re: same; Reviewed Order on Emergency Motion to Terminate; Emailed same to Wendy Jaksick	0.50	212.50
10/16/2018	ZEJ	Exchanged emails with Mark Connot re: [REDACTED]		
		[REDACTED] Conference call with Discovery Commissioner's coordinator re: discovery issues; PC with Wendy Jaksick re: [REDACTED]	1.00	425.00
10/18/2018	RKS	Telephone hearing re: deposition and discovery issues; PC w/ Mark & ZEJ re: [REDACTED]	1.25	687.50
	ZEJ	Telephone Status Conference with the Discovery Commission and all Counsel of Record; CC with RKS and MC re: [REDACTED]	1.00	425.00
10/19/2018	ZEJ	PC with Mark Connot re: [REDACTED]	0.25	106.25
10/22/2018	RKS	Coordinated and purchased plane ticket for 11/17/2018; Re-arranged return flight on 10/31 and 11/01; Conferred w/ JCC re: preparing Req. for Production to Todd in various capacities about the numerous entities; Organizing Todd's deposition transcript.	1.50	825.00
	BOS	Discussion on Entities and Charts	0.25	62.50
10/24/2018	JCC	Carve out RFP's for each capacity of Todd; prepare RFP's to Stan	2.00	300.00
10/25/2018	ZEJ	Reviewed and saved Trust accountings as separate files; Prepared and sent correspondence requesting the production of certain trust financials for Wendy's, Stan's and Todd's Family Trust Subtrusts	1.00	425.00
	JCC	Add all remaining Entities to RFP and email Mark	1.25	187.50
10/26/2018	KMC	Organized exhibits; printed and created binders for RKS	1.50	150.00
10/28/2018	ZEJ	Reviewed and prepared documents for Todd Jaksick deposition; Conferred with RKS re: same	5.50	2,337.50
10/29/2018	KMC	Received copies of discovery from Lattin and Robison; saved and emailed ZEJ same	0.25	25.00
	ZEJ	Reviewed chron and document production concerning Tahoe Transaction; Prepared notes of transaction for RKS	2.00	850.00
11/01/2018	BOS	Researched Registered Agents of Entities	2.50	625.00

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 17

			Hours	
11/05/2018	ZEJ	Conferred with RKS re: [REDACTED] Prepared draft Promissory Note for potential loan for Wendy Jaksick from Stan Jaksick	1.00	425.00
	BOS	Conference w/ RKS, ZEJ, and JCC re: [REDACTED] Researched registered agents for subpoenas of entities	1.75	437.50
11/07/2018	ZEJ	PC with RKS and MC re: [REDACTED] Emailed DL re: [REDACTED]	1.00	425.00
11/10/2018	RKS	Reviewing transcript; Working on Motion to Remove.	5.00	2,750.00
11/11/2018	RKS	Working on Motion to Remove.	4.00	2,200.00
11/12/2018	ZEJ	Prepared Response to Opposition to Motion to Compel RFPs to Todd Jaksick; Conferred with RKS re: [REDACTED]	4.00	1,700.00
11/13/2018	BOS	Prepared ACPA portion of Motion to Remove Todd	1.50	375.00
	RKS	Working on Motion to Remove; Worked on and sent to Mark additions and changes to the Opposition to Motion for Summary Judgment.	6.00	3,300.00
	JCC	Prepare subpoenas duces tecum of BoA & American Ag Credit	0.75	112.50
	ZEJ	Finalized and filed Reply to Responses to Wendy Jaksick's Motion to Compel Production for Todd Jaksick	7.50	3,187.50
11/14/2018	BPH	Conferred w/ RKS re: [REDACTED] Reviewed draft of removal section and counts for removal; Reviewed latter days of Todd's depositions and pulled excerpts from same to add to removal action; Multiple emails to RKS and ZEJ re: [REDACTED] Conferred w/ RKS re: same.	5.75	2,012.50
	BOS	Prepared ACPA portion of Motion to Remove Todd	8.75	2,187.50
	JCC	Research regarding motion to remove; read through deposition transcripts and pull relevant information; conference with BOK and RKS regarding [REDACTED]	8.50	1,275.00
11/15/2018	JCC	Prepare demand letter for Maupin Cox & Legoy; research relevant nevada case law regarding attorney liability for breach of fiduciary duty	1.00	150.00
	BPH	Reviewed deposition excerpts and sent same via email to RKS for inclusion in motion to remove.	0.25	87.50
	ZEJ	Prepared Motion to Compel Production from Bob LeGoy and Maupin Cox LeGoy; Reviewed, updated and finalized Lake Tahoe Section of Petition to Remove; Coordinated review and verification of Petition to Remove by Wendy Jaksick; Reviewed and identified documents for 11-16-2018 hearing binder; Conferred with KC and LN re: [REDACTED]	4.75	2,018.75
	BOS	Conferred w/ RKS re: [REDACTED] Prepared Motion to Remove Todd	6.25	1,562.50
	JCC	Research Nevada case law definition of self dealing; assist in preparation of motion to remove	4.75	712.50
	RKS	Finalized Emergency Motion to Remove; Flight to Reno (through San Diego); Reviewed Motions for hearing tomorrow; Prepared Notes re: same.	12.00	6,600.00
11/16/2018	ZEJ	Conferred with RKS re: [REDACTED] Emailed documents re: same; Conferred with RKS re: [REDACTED]		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 18

			<u>Hours</u>	
			0.50	212.50
	RKS	Prepared for hearing; Court appearance re: discovery motions, continuing trial and other issues; Prepared for Hascheff hearing tomorrow.	12.00	6,600.00
11/17/2018	RKS	Attended and took the deposition of Pierre Hascheff.	12.00	6,600.00
11/18/2018	RKS	Return flight from Reno to Dallas	5.00	2,750.00
11/19/2018	KMC	Received pleadings from Kent Robison; scanned and emailed same to ZEJ	0.25	25.00
11/20/2018	ZEJ	CC with MC, AH, KS and RKS re: [REDACTED]	0.50	212.50
11/26/2018	RKS	Prepared long e-mail to team re: [REDACTED]	0.75	412.50
11/28/2018	RKS	Conferred w/ ZEJ re: [REDACTED]; E-mail to Mark re: [REDACTED]	0.50	275.00
11/29/2018	ZEJ	Reviewed draft Subpoena for medical records from California; Prepared memo re: [REDACTED]		
		[REDACTED] Reviewed email from Yesenia M. Gallegos re: California subpoena issues; Emailed Janine Dodds, Yesenia Gallegos, MC and RKS re: [REDACTED] Begin drafting Subpoena for records from Bank of America; CC with MC, AH, KS and RKS re: [REDACTED] Prepared and sent correspondence to Don Lattin and Kent Robinson re: production of financials for Wendy's, Stan's and Todd's Subtrusts;	1.50	637.50
	RKS	Conference call w/ Mark, Amanda & Kevin Sutehall and ZEJ re: [REDACTED]		
		[REDACTED] Conferred w/ ZEJ re: [REDACTED]	1.25	687.50
11/30/2018	ZEJ	Reviewed and responded to email from Janine Dodds re: issues with California Subpoena for medical records; Reviewed dates to schedule Kevin Riley and Jessica Clayton's depositions; Conferred with RKS re: same; Emailed Mark Connot re: [REDACTED] Calendared all pretrial and trial deadlines;	1.50	637.50
	JCC	Finalize demand letter for maupin cox legoy	0.75	112.50
	RKS	Worked on and made changes to demand letter to Maupin Cox.	1.50	825.00
12/02/2018	RKS	Prepared and sent e-mail to Mark re: [REDACTED]	0.25	137.50
12/03/2018	KMC	Received discovery in the mail; scanned saved and emailed to ZEJ	0.25	25.00
	ZEJ	Continue work on Motion to Compel Production of Documents from Mr. LeGoy and Maupin, Cox & LeGoy	1.75	743.75
12/04/2018	ZEJ	Exchanged emails with DL re: [REDACTED]		
		[REDACTED] Finished Motion to Compel Production; Emailed circulated same for review and filing	1.25	531.25
12/05/2018	ZEJ	Reviewed Response and Opposition to Wendy Jaksick's Motion to Compel Production from Jessica Clayton; Prepared draft requests and definitions to include in Jessica Clayton's Subpoena Duces Tecum; Emailed MC, AH, KS and RKS re: same; PC with MC re: [REDACTED] Emailed		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 19

			Hours	
	DL re:	[REDACTED]	0.75	318.75
12/06/2018	ZEJ	Prepared draft Subpoena for records from TICOR Title; Prepared and circulated proposed Discovery Conference Statement; Circulated same by email for review and comment; Reviewed and made redlined changes to the Motion to Compel Production from Nanette Childers; Circulated same by email to finalize and file	3.25	1,381.25
12/10/2018	ZEJ	PC (left message) for Mickey Davis re: serving as fiduciary expert; PC (left message) for Roger Stolbach re: serving as fiduciary expert; PC with Adam Hosmer-Henner re: settlement conference, recent motions and other issues; PC with Gary Stolbach re: serving as fiduciary expert; PC with Linda James re: [REDACTED] Emailed Linda James re: [REDACTED] PC with Bruce Wallace re: serving as Fiduciary Expert; Emailed Gary Stolbach information for conflicts check; Emailed Bruce Wallace information for conflicts check; Reviewed files for signature pates for Linda James	3.25	1,381.25
12/11/2018	ZEJ	Searched for Jessica Clayton contact information; PC with MC, AH and RKS re: [REDACTED] Discovery Conference with Judge Ayers and all counsel	2.00	850.00
	RKS	PC w/ Mark Connot, Amanda Hunt and ZEJ re: [REDACTED] Long tele-hearing with Judge Ayers re: various discovery issues.	1.50	825.00
12/12/2018	ZEJ	Reviewed and identified Sam Jaksick signatures for expert witness; Conferred with Wendy Jaksick re: same; PC with Bruce Wallace re: expert witness; PC with Gary Stolbach re: expert witness; PC with RKS and Gary Stolbach re: expert witness;	2.25	956.25
12/13/2018	ZEJ	Emailed Fee Agreement and Dropbox link to signatures to Linda James; PC with Linda James re: [REDACTED] Mailed Linda James hard copies of documents; PC with MC, AH and RKS re: [REDACTED] PC with Bruce Wallace re: expert; PC with Carolyn Renner re: discovery issues; Conferred with RKS re: same; Emailed DL names of experts with resumes to prepare draft Expert Disclosures; Prepared and finalized Wendy Jaksick's Second Set of Interrogatories and Ninth Request for Production to Todd Jaksick	3.75	1,593.75
	KMC	Prepared correspondence to Linda James re: [REDACTED]	0.50	50.00
	BOS	Prepared Motion to Compel - Kevin Riley	1.00	250.00
12/14/2018	ZEJ	PC with Linda James re: [REDACTED] PC with Bruce Wallace re: fiduciary expert; PC with Mark Connot re: [REDACTED] Reviewed Kevin Riley Response to Requests for Production; Finalized Discovery Conference Statement; Emailed same to MC and DL for filing	2.75	1,168.75
12/17/2018	ZEJ	Multiple PCs with Bruce Wallace re: expert report; Multiple PCs with Gary Stolbach re: expert report; Multiple PCs with Mark Connot and his office re: [REDACTED] PC with Amanda Hunt re: [REDACTED]	2.00	850.00
12/18/2018	ZEJ	PC with Gary Stolbach re: expert report; Reviewed and made notes		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 20

			<u>Hours</u>	
concerning Discovery Conference Statements; PC with Chris Nolland re: [REDACTED]; Emailed Chris Nolland Fee Agreements; PC with MC and AH re: [REDACTED]; Reviewed records produced by Kevin Riley and Maupin Cox LeGoy in preparation for Discovery Conference; Participated in Discovery Conference; PC with Mark Connot re: same			4.50	1,912.50
12/19/2018	ZEJ	Meeting with Chris Nolland re: [REDACTED] g [REDACTED]; Texted Wendy Jaksick re: [REDACTED] [REDACTED] Began drafting Response to Todd Jaksick's Motion for Summary Judgment on Tahoe Claims	2.50	1,062.50
12/20/2018	BOS	Reviewed Wendy's Deposition for Tahoe Property Information for <i>Motion for Summary Judgment</i> exhibits and amended petition	5.25	1,312.50
12/21/2018	BOS	Pulled Todd Depo Testimony for <i>Motion for Summary Judgment</i> ; Reviewed same, pulled excerpts for <i>Motion for Summary Judgment</i> exhibits	2.50	625.00
12/23/2018	RKS	Sent e-mail to Chris Nolland re: [REDACTED]; Prepared long e-mail to Mabel Simpson and Shelley Hickey re: running title and acreage and water rights searches in Nevada.	1.00	550.00
12/24/2018	RKS	Conf. Call w/ Chris Nolland, Mark Connot & ZEJ re: [REDACTED] [REDACTED] Reviewed and made changes to Reply to Opposition to Emergency Motion to Redress Breach of Fiduciary Duty.	2.00	1,100.00
12/31/2018	JCC	Read Todd's depo to pull questions where he claimed ignorance	2.50	375.00
	BOS	Reviewed Todd's Depos for reference to Kevin Reilly in preparation for Reilly's depo	2.25	562.50
01/01/2019	ZEJ	Travel to Reno for Mediation and Depositions; Meeting with Wendy Jaksick, Chris Nolland, MC and RKS re: [REDACTED]	7.00	2,975.00
01/02/2019	KMC	Received mail from Maupin, Cox, Legoy re: Petitioners & Kevin Riley's Designation of Rebuttal Expert Witnesses; emailed same to ZEJ & RKS	0.25	25.00
	ZEJ	Mediation	9.00	3,825.00
01/03/2019	ZEJ	Mediation; Prepared 30(b)(6) Subpoenas for the Issue Trust and Family Trust	9.00	3,825.00
01/04/2019	ZEJ	Deposition of Kevin Riley	9.00	3,825.00
01/05/2019	ZEJ	Deposition of Kevin Riley	7.00	2,975.00
01/06/2019	ZEJ	Travel from Reno returning from mediation and depositions	7.00	2,975.00
01/07/2019	RKS	PC w/ Mark Connot, Chris Nolland & ZEJ re: [REDACTED] i.	0.75	412.50
01/08/2019	ZEJ	Reviewed authority and prepared Response to Trustees' Joinder to Todd Jaksick's Motion for Summary Judgment based on Wendy's Tahoe Property Claims	5.25	2,231.25
01/09/2019	ZEJ	PC with Gary Stolbach re: deposition	0.50	212.50



Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 21

			Hours	
	ZEJ	Found and reviewed authority and prepared draft Motion for Leave to File Response to Trustees' Joinder to Todd's Motion for Summary Judgment	1.50	637.50
01/10/2019	ZEJ	Prepared Motion for Leave to file Opposition to Joinder to Motion for Summary Judgment	1.75	743.75
01/11/2019	ZEJ	Reviewed and made changes to draft Discovery Conference Statement; Prepared Declaration in support of Motion for Leave to File Response to Joinder to MSJ; Finalized and filed Motion for Leave to File Response to Joinder to <i>Motion for Summary Judgement</i> with Opposition to Joinder to Motion for Summary Judgment; Reviewed Objections to 30(b)(6) Subpoenas to the Family Trust and the Issue Trust; PCs with Amanda Hunt re: [REDACTED] Reviewed and made changes to response to Objections to 30(b)(6) Subpoenas to the Family Trust and the Issue Trust	3.75	1,593.75
01/13/2019	RKS	Reviewed e-mails; Prepared e-mail summarizing upcoming deposition schedule.	0.50	275.00
01/14/2019	ZEJ	Emailed Kent Robison and Don Lattin re: expert depositions; Exchanged emails with Gary Stolbach re: coordinating travel for deposition on 01-17-2019; PC with Bruce Wallace re: coordinating travel for deposition on 01-23-2019; Reviewed discovery for Income Tax Returns and Estate Income Tax Returns for Sam Jaksick; Reviewed discovery re: document requests re: experts; Prepared and emailed correspondence to Kent Robison and Don Lattin re: demand for production of Income Tax Returns immediately; Reviewed Gary Stolbach Expert Report in preparation for 01-17-2019 deposition; PC with Mark Connot re: [REDACTED]	3.75	1,593.75
	RKS	PC w/ Mark re: [REDACTED] E-mails with Team re: [REDACTED]	0.75	412.50
01/15/2019	ZEJ	Continued review of Gary Stolbach's report; PC with Gary Stolbach re: report and deposition prep; PC with Amanda Hunt re: [REDACTED] Reviewed Subpoena to Nic Palmer and his responses and objections to same; CP with Nic Palmer re: meet and confer confirming his objections and responses	1.75	743.75
	RKS	Tele-hearing with Discovery Commissioner Ayers & Opposing Counsel re: Various discovery matters.	1.00	550.00
	RKS	PC w/ Chris Nolland re: [REDACTED]	0.25	137.50
01/16/2019	RKS	Conferred w/ ZEJ re: [REDACTED] E-mails w/ team re: [REDACTED]	0.75	412.50
01/17/2019	ZEJ	Prepared Motion to Compel Production of Subtrust Accountings, Reduce Compensation and for Costs; Multiple PCs with Amanda Hunt re: [REDACTED]	4.75	2,018.75
01/18/2019	ZEJ	Made changes and additions to Discovery Conference Report; Circulated same to MC, RKS and AH; PC with Bruce Wallace re: expert testimony; PC with Gary Stolbach re: expert testimony; Prepared Wendy's Objections to Wendy's Objections to Pretrial Disclosures; Conferred with Amanda Hunt and		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 22

			<u>Hours</u>	
		DL re: [REDACTED]	6.50	2,762.50
01/23/2019	RKS	Return trip from Reno to Dallas.	6.00	3,300.00
01/25/2019	ZEJ	Reviewed and made changes and additions to Discovery Conference Statement; PC with Amanda Hunt and Doreen Loffredo re: [REDACTED] [REDACTED] Exchanged emails with opposing counsel re: deposition schedule; PC with Nic Palmer re: production and his availability for deposition next week; Conference call with Mark Connot, Amanda Hunt and Doreen Loffredo re: [REDACTED] [REDACTED] Telephone appearance for pretrial discussion with Judge Hardy, Kent Robison, Adam Hossmer-Henner and Don Lattin	3.00	1,275.00
01/27/2019	ZEJ	CC with RKS, Chris Nolland and MC re: s Reviewed Green's expert designation and report; Emailed Wendy Jaksick re: same	1.00	425.00
01/28/2019	ZEJ	Prepared materials for deposition of James Green; PC with Linda James re: [REDACTED] Conferred with RKS re: same; Attended James Green deposition; Prepared for deposition of Kurt Hardung; Appeared for telephone deposition of Kurt Hardung	6.00	2,550.00
	RKS	Reviewed Report of Green in preparation for his deposition; Took the deposition of Jim Green by video from Eugene Oregon.	7.00	3,850.00
01/29/2019	RKS	Found new place to stay in Reno; Conferred w/ ZEJ re: [REDACTED]	1.00	550.00
01/30/2019	ZEJ	Made additional changes to draft Supplement to First Amended Counter-Petition; Exchanged emails with Amanda Hunt re: same	0.50	212.50
	RKS	Spent time organizing stay arrangements in Reno and paying for them; Conferred w/ Kenia re: [REDACTED] Worked on and sent changes to Motion for Continuance.	3.50	1,925.00
	BOS	Adjusted Water Rights PDFs for use as exhibits	1.25	312.50
01/31/2019	RKS	Flew to Reno for trial; Prepared for deposition of Todd Jaksick.	8.00	4,400.00
	BOS	Emailed Jury Charges to ZEJ & RKS	0.50	125.00
02/01/2019	RKS	Prepared for and took the deposition of Todd Jaksick.	10.00	5,500.00
	ZEJ	Preparation for Todd Jaksick's deposition and Nicholas Palmer's depositions; Todd Jaksick's deposition; Nicholas Palmer's deposition; Meeting with Wendy Jaksick re: status of case, settlement negotiations and other issues	9.25	3,931.25
02/02/2019	RKS	Worked all day on trial preparation.	8.00	4,400.00
	ZEJ	Review of documents and preparation of Wendy's additional trial exhibits	6.25	2,656.25
02/03/2019	RKS	Worked all day preparing for trial; Reviewing previous orders and motions for tomorrow's pre-trial hearing; Worked on Opposition to Motion in Limine re: Settlement Agreement.	12.00	6,600.00
	ZEJ	Continued review of documents and preparation of Wendy's additional trial exhibits; Prepared and reviewed pleadings in preparation for pretrial hearing	9.25	3,931.25
02/04/2019	ZEJ	Court appearance to mark trial exhibits; Pretrial prep; Court appearance for pretrial hearing; Conferred with Wendy Jaksick, RKS, MC and CN re: [REDACTED]		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 23

			<u>Hours</u>	
			8.25	3,506.25
	RKS	Finalized Opposition to MIL re: Settlement Agreement; Prepared for hearing; Trip to Courthouse for court appearance re: Motion for Continuance and various issues; Preparing for hearing tomorrow.	10.00	5,500.00
02/05/2019	RKS	Trip to Courthouse in Reno, NV; Meeting w/ Amanda Dick to mark Exhibits for Trial; Court appearance re: Motion for Continuance and pre-trial matters.	8.00	4,400.00
	ZEJ	Trip to Courthouse in Reno, NV; Meeting w/ Amanda Dick to mark Exhibits for Trial; Court appearance re: Motion for Continuance and pre-trial matters.	8.00	3,400.00
02/06/2019	RKS	Court appearance re: hearing on discovery and trial.	10.00	5,500.00
	ZEJ	Court appearance re: hearing on discovery and trial.	10.00	4,250.00
02/07/2019	RKS	Trip back to Dallas from Reno; Received settlement offer; Teleconference w/ Chris, Mark & ZEJ re: same and strategy for responding.	6.50	3,575.00
	ZEJ	Trip back to Dallas from Reno; Received settlement offer; Teleconference w/ Chris, Mark & RKS re: same and strategy for responding.	6.50	2,762.50
02/10/2019	RKS	Reviewing Maupin Cox LeGoy production; Corresponding with team re: same.	3.00	1,650.00
02/12/2019	RKS	Trip to Reno; Reviewing and making notes re: Todd's deposition.	12.00	6,600.00
	ZEJ	Trip to Reno; Reviewing and making notes re: Todd's deposition.	12.00	5,100.00
02/13/2019	RKS	Court appearance in District Court in Washoe County re: Pre-Trial matters; Reviewed settlement offer; Formulated response to same after discussions with Wendy; Reviewing Todd's deposition transcript; Prepared Proposed Questions for Jury Venire; Sent same to Amanda Dick at Court.	10.00	5,500.00
	ZEJ	Court appearance in District Court in Washoe County re: Pre-Trial matters; Reviewed settlement offer; Formulated response to same after discussions with Wendy; Reviewing Todd's deposition transcript; Prepared Proposed Questions for Jury Venire; Sent same to Amanda Dick at Court.	10.00	4,250.00
02/14/2019	RKS	Prepared for Voir Dire; Court appearance re: Voir Dire and picked a jury.	12.00	6,600.00
	ZEJ	Prepared for Voir Dire; Court appearance re: Voir Dire and picked a jury.	12.00	5,100.00
02/15/2019	KMC	Updated Exhibit List; emailed to ZEJ	2.00	200.00
	RKS	Prepared for Opening Statement; Court appearance re: Giving Opening Statements.	7.00	3,850.00
	ZEJ	Prepared for Opening Statement; Court appearance re: Giving Opening Statements.	7.00	2,975.00
02/16/2019	RKS		10.00	5,500.00
02/17/2019	RKS	Preparing for jury trial; Reviewing Todd's deposition transcript.	10.00	5,500.00
	ZEJ	Preparing for Jury Trial	10.00	4,250.00
02/18/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	5,100.00
02/19/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	5,100.00

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 24

			<u>Hours</u>	
02/20/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	5,100.00
02/21/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Todd Jaksick	12.00	5,100.00
02/22/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick and Pierre Hascheff	8.00	4,400.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Todd Jaksick	8.00	3,400.00
02/25/2019	RKS	Prepared for trial; Court appearance for jury trial - Pierre Hascheff	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Pierre Hascheff	12.00	5,100.00
02/26/2019	RKS	Prepared for trial; Court appearance for jury trial - Todd Jaksick, Wendy Jaksick, Jim Smrt, Michael Kimmel	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Wendy Jaksick	12.00	5,100.00
02/27/2019	RKS	Prepared for trial; Court appearance for jury trial - Jessica Clayton and Stan Jaksick.	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Jessica Clayton and Stan Jaksick	12.00	5,100.00
02/28/2019	RKS	Prepared for trial; Court appearance for jury trial - Bruce Wallace and Motions for Directed Verdict	12.00	6,600.00
	ZEJ	Prepared for trial; Court appearance for jury trial - Bruce Wallace and Motions for Direct Verdict	12.00	5,100.00
03/01/2019	ZEJ	Jury Trial	6.50	2,762.50
	RKS	Jury Trial; Motions for Directed Verdict; Witnesses: Todd Jaksick and Bob LeGoy.	9.00	4,950.00
03/04/2019	ZEJ	Closing Arguments and Jury Verdict	13.00	5,525.00
	RKS	Jury Trial - Closing and verdict	14.00	7,700.00
03/05/2019	ZEJ	Travel Home from Reno	6.00	2,550.00
	RKS	Travel back from Reno, NV to Dallas.	10.00	5,500.00
03/12/2019	ZEJ	Reviewed various Memoranda of Costs; Reviewed emails from MC and DL re: [REDACTED] Found and reviewed authority re: same; PC for Titus Cotton (Juror) to discuss case; PC with Judy Price (Juror) re: trial; Conferred with RKS re: [REDACTED] PC with RKS, MC and AH re: PC [REDACTED]	1.50	637.50
03/14/2019	ZEJ	Reviewed Memorandums of Costs submitted by various parties; Reviewed and made changes/additions to Omnibus Response of Wendy Jaksick to the Memorandums of Costs; Prepared Demand to Todd Jaksick for his resignation as Trustee of the Issue Trust, Co-Trustee of the Family Trust and Co-Trustee of Wendy's Subtrust; Prepared correspondence to Trustee and Co-Trustees re: prior failures to deliver trust accountings and demand for timely preparation and delivery of 2018 annual accountings for the Issue Trust, Family Trust and Wendy Subtrust	3.25	1,381.25

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 25

			Hours	
03/15/2019	ZEJ	PC with MC re: [REDACTED] re: Todd's removal, settlement negotiations and other issues; Finalized and served demand for Todd Jaksick to resign; demand for Stan Jaksick and Michael Kimmel to remove Todd Jaksick or seek his removal and demand for accountings	0.75	318.75
03/20/2019	ZEJ	Update firm system with files from trial; Finalize correspondence to Co-Trustees demanding an explanation of the \$4 million benefiting Wendy and demanding distributions from her Trust	1.00	425.00
03/25/2019	ZEJ	PC with Amanda Hunt re: [REDACTED]; Conferred with KS re: [REDACTED]; Emailed SJPLLC Invoice through August 26, 2018 to Amanda Hunt	0.25	106.25
	RKS	Read Motion for Order Awarding Fees; Read and made extensive changes to draft of Response to same.	2.50	1,375.00
	ZEJ	Reviewed and made proposed changes and additions to Opposition to Motion for Attorneys Fees filed by Todd Jaksick	1.00	425.00
04/05/2019	RKS	Reviewed form of Notes for Audi and \$12,000; Conferred w/ ZEJ re: [REDACTED]	0.75	412.50
04/29/2019	RKS	Conferred w/ ZEJ re: [REDACTED]	0.50	275.00
	ZEJ	Conferred with Amanda Hunt re: [REDACTED]; Finalized and filed Response to Motion in Limine and Partial Motion for Summary Judgment; Began drafting Petition to Compel Accountings and for Other Relief	3.50	1,487.50
04/30/2019	ZEJ	Reviewed Joinder to Motion in Limine and Partial Motion for Summary Judgment filed by Trustees; Conferred with Amanda Hunt re: [REDACTED]; Reviewed Amanda Hunts draft Opposition to same	0.50	212.50
05/01/2019	ZEJ	Prepared and finalized draft Petition to Compel Accountings and for Other Relief; Circulated draft to MC, RKS and AH for review and comments	3.25	1,381.25
05/02/2019	ZEJ	Conferred with RKS re: [REDACTED]; Emailed DL re: same	0.25	106.25
	ZEJ	PC with MC, AH and RKS re: [REDACTED]; CC with Judge Hardy and all counsel of record re: pretrial issues; PC with MC, AH and RKS re: [REDACTED]	1.50	637.50
	WMU	PC with Court and all counsel of record re: [REDACTED] (.50 - N/C)		n/c
	RKS	PC w/ Mark Connot, Amanda Hunt & ZEJ re: [REDACTED]; Teleconference w/ Judge Hardy & opposing counsel, Mark Connot & ZEJ re: pretrial statute conference over equitable claims; PC w/ Mark Connot & ZEJ re: [REDACTED]	2.00	1,100.00
	BOS	CC re: [REDACTED]	0.50	125.00
05/04/2019	ZEJ	Preparation for 05-12-2019 Bench Trial	3.50	1,487.50
05/06/2019	ZEJ	Reviewed email from Keith Cartwright with additional Exhibits from trial and updated master Exhibit File; Reworked the Petition for Accountings to file as a Second Supplement to Wendy Jaksick's First Amended Counter-Petition;		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 26

			Hours	
		Emailed MC, AH and RKS re: [REDACTED] Continued work preparing for trial including review and designation of additional exhibits	3.75	1,593.75
	RKS	Prepared form for Trial Summary Memo re: [REDACTED]	1.00	600.00
	RKS	PC w/ Chris Nolland re: [REDACTED]	0.50	275.00
	BOS	Purchased travel to Reno for Trial	0.25	62.50
05/07/2019	BOS	Prepared Trial Issue Memos - [REDACTED]	6.75	1,687.50
05/08/2019	ZEJ	Exchanged emails with Amanda Hunt re: [REDACTED]		
		[REDACTED] Updated Second Supplement to First Amended Petition; Circulated same RKS, MC and AH for review	1.75	743.75
	BOS	Prepared Trial Issue Memo [REDACTED]	2.00	500.00
05/10/2019	RKS	Working on numerous drafts of settlement offer.	2.50	1,375.00
	BOS	Compiled Todd's trial pleadings for Trial	2.00	500.00
05/12/2019	RKS	Trip to Reno, NV for hearing tomorrow.	8.50	4,675.00
05/13/2019	RKS	Court appearance re: equity trial; Entered agreement re: submitting additional evidence and submitting the case on Briefs and written arguments; Travel back to DFW from Reno.	16.00	8,800.00
05/14/2019	BPH	Conferred w/ RKS re: [REDACTED]	0.50	175.00
	RKS	Conferred w/ BPH re: [REDACTED]	0.50	275.00
	BOS	Worked w/ RKS preparing stipulations regarding equitable trial and offered exhibits	1.75	437.50
05/16/2019	BPH	Conference call w/ SJPLLC team and Mark Connott re: [REDACTED]	0.50	175.00
	ZEJ	CC with MC, AH, RKS, BU and BS re: [REDACTED]	0.50	212.50
	BOS	CC re: [REDACTED]	1.00	250.00
	RKS	Prepared Reply to Objection to Offer of Additional Evidence.	1.00	550.00
05/17/2019	BPH	Reviewed the oral pronouncement from trial.	0.25	87.50
	RKS	Discussions on Trial answers w/ ZEJ	0.50	275.00
	BOS	Conferred w/ RKS re: [REDACTED] Reviewed accountings for issues/discrepancies which need to be addressed before Trustees can be released	3.00	750.00
05/24/2019	ZEJ	PC with Amanda Hunt re: [REDACTED]		
		[REDACTED] Exchanged message with Wendy Jaksick re: [REDACTED] CC with RKS and MC re: [REDACTED]	0.50	212.50
	RKS	CC w/ ZEJ & MC re: [REDACTED]	0.50	275.00
05/28/2019	ZEJ	Conferred with RKS re: [REDACTED]		
		[REDACTED] CC with MC, AH and RKS re: same	0.50	212.50
	RKS	PC w/ Mark, Amanda & ZEJ re: [REDACTED]	0.50	275.00
	BOS	PC w/ RKS, ZEJ, Mark & Amanda re: [REDACTED]	1.00	250.00

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 27

			<u>Hours</u>	
05/29/2019	ZEJ	Begin drafting Brief of Closing Arguments; Conferred with RKS re: same; Updated draft Brief; Reviewed proposed settlement offer drafted by MC; Updated and emailed same to Wendy Jaksick for review and to obtain authority to communicate to opposing counsel; Reviewed Motion to Strike and Joinder to Motion to Strike and began drafting opposition to same	2.25	956.25
	RKS	Conferred w/ ZEJ & BOS re: [REDACTED] Reviewed and e-mailed Mark re: [REDACTED]	0.50	275.00
05/30/2019	ZEJ	Finalized draft Opposition to Motion to Strike and Joinder to Motion to Strike; Circulated same for comments	5.00	2,125.00
06/03/2019	ZEJ	Exchanged emails from Mark Connot re: [REDACTED]	0.25	106.25
06/05/2019	ZEJ	Reviewed and made changes to Brief of Closing Arguments; Emailed RKS, MC and AH re: same	0.50	212.50
06/11/2019	ZEJ	Continue work on closing brief; Conferred with RKS re: [REDACTED]	2.75	1,168.75
06/12/2019	ZEJ	Continued work on Closing Arguments Brief	3.75	1,593.75
06/13/2019	BOS	PC w/ Amanda re: [REDACTED]	0.25	62.50
06/14/2019	ZEJ	Continued work on Brief of Arguments for Equity Trial	7.25	3,081.25
06/15/2019	RKS	Working on Indemnity Agreement section to Trial Brief for Jury Trial.	3.00	1,650.00
	ZEJ	Continued work on Brief of Arguments for Equity Trial	6.00	2,550.00
06/16/2019	RKS	Preparing Indemnity Agreement section of Trial Brief; Conferred w/ trial team re: attempting to get the trial brief deadline extended.	2.50	1,375.00
	ZEJ	Continued work on Brief of Arguments for Equity Trial	5.75	2,443.75
06/17/2019	ZEJ	Continued work on Brief of Arguments for Equity Trial; Multiple PCs with Wendy Jaksick re: [REDACTED] Conferred with RKS re: [REDACTED]	8.25	3,506.25
06/18/2019	BPH	Reviewed emails and documents re: continuance; Conferred w/ ZEJ re: same; Prepared draft of Motion for Continuance; Conferred w/ ZEJ re: [REDACTED]	2.00	700.00
	ZEJ	Continued work on Brief of Arguments for Equity Trial; Prepared Emergency Motion for Continuance and Declarations in support of same	9.50	4,037.50
	BOS	Helped ZEJ w/ Trial Brief authority and removal and remedies issues	2.50	625.00
06/19/2019	BPH	Prepared Surcharge, Breach of Fiduciary Duties and Equitable Remedies section for Opening Brief; Reviewed authority re: same; Conferred w/ ZEJ re: same; Prepared Ex Parte Application and proposed Order for Motion for Extension; Prepared Attorney's Fees section for Opening Brief.	3.25	1,137.50
	ZEJ	Filed Emergency Motion for Continuance; Communicated with Court Staff re: obtaining consideration of same; Continued work on Brief of Arguments for Equity Trial	7.50	3,187.50
	BOS	Researched disgorgement issue for trial brief; Prepared brief section re:		

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 28

			Hours	
		disgorgement of trustees fees and disgorgement/denial of attorney's fees; Forwarded same to ZEJ for addition to brief; Researched surcharge issue for trial brief	5.75	1,437.50
06/21/2019	ZEJ	CC with MC, CN and RKS re: [REDACTED] [REDACTED]; Exchanged texts with Wendy re: [REDACTED]	1.00	425.00
06/24/2019	ZEJ	CC with MC, RKS and AH re: [REDACTED] [REDACTED] Conferred with RKS re: [REDACTED]	1.50	637.50
	RKS	Reviewed and made changes to e-mail to Wendy re: [REDACTED] [REDACTED] Reviewing transcripts; Working on Trial Brief	4.50	2,475.00
	BOS	CC w/ Mark, Amanda, RKS, ZEJ re: [REDACTED] Researched issue regarding surcharge and calculation of same.	1.50	375.00
06/25/2019	RKS	Reviewing trial exhibits for brief; Working on Brief.	4.00	2,200.00
	ZEJ	Continued work on Opening Arguments Brief	2.25	956.25
06/26/2019	WMU	Reviewed Jury Trial Transcript and identified exhibits to include in Bench Trial Brief and prepared Memo re: same;	2.50	1,250.00
06/28/2019	WMU	Reviewed Jury Trial Transcript and identified additional exhibits to include in Bench Trial Brief;	1.50	750.00
	BPH	Reviewed ZEJ's working draft of brief and made changes, revisions and additions to same; Reviewed trial exhibits related to same.	3.00	1,050.00
06/29/2019	RKS	Working on Indemnity Agreements section of Trial Brief.	4.00	2,200.00
06/30/2019	ZEJ	Continued work on Opening Arguments Brief	4.75	2,018.75
	RKS	Working on Indemnity Agreements section and then Lake Tahoe section of Trial Brief.	8.00	4,400.00
07/01/2019	RKS	Working on Lake Tahoe Section of Trial Brief; Reviewed, proofed and made changes to Trial Brief in an effort to finalize same.	10.00	5,500.00
	BPH	Technical proof read and edit of current draft of brief; Typed of transcript excerpt and look for place in brief regarding same.	1.00	350.00
	WMU	Proofed Indemnity Agreement trial brief section; Reviewed testimony of Pierre Hascheff to add to trial brief; Prepared section to add to trial brief re: Jessica Clayton's notary testimony; Proofed trial brief;(2hrs at N/C)	4.50	2,250.00
	ZEJ	Finalized and filed Opening Arguments Brief	8.25	3,506.25
	BOS	Met w/ RKS and SS re: [REDACTED] Prepared brief section regarding surcharge; Sent same to ZEJ to incorporate in final brief	5.50	1,375.00
	JCC	scanning 2700 page transcript to find references to Tahoe property and its acquisition and create exhibit chart with those references	8.00	1,200.00
07/16/2019	RKS	Conferred w/ ZEJ re:	0.50	275.00
	ZEJ	Prepared Emergency Motion to Compel Distributions from Family Trust; Exchanged emails and text messages from Wendy re: same; Conferred with RKS re: same	3.25	1,381.25
07/19/2019	KMC	Prepared book for RKS re:	0.50	50.00



Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 29

			<u>Hours</u>	
07/20/2019	RKS	Began reviewing briefs filed by the opposing side; Analyzing them and making notes in preparation of responding.	2.00	1,100.00
	RKS	Reviewing Briefs filed by opposing side; Analyzing them and making notes in preparation for responding	2.00	1,100.00
07/22/2019	ZEJ	Updated Emergency Motion to Compel Distributions with RKS changes/additions; Finalized exhibits; Emailed MC and DL re: ; Reviewed comments from Mark Connot; PC with Wendy Jaksick re: Finalized Motion to Compel Distributions; Review Opening Argument Briefs of Todd Jaksick and the Trustees; Began drafting Closing Arguments Brief	4.50	1,912.50
	RKS	Reviewed and made changes to Emergency Motion to Compel Distributions; Conferred w/ ZEJ re:	0.75	412.50
07/23/2019	ZEJ	PC with Wendy re: ; Prepared Ex Parte Application Shorting Time on Motion for Distributions with proposed Order; Emailed documents to Doreen Loffredo for review and filing	1.00	425.00
	BPH	Conferred w/ ZEJ re:	0.25	87.50
	ZEJ	Continued work on Closing Arguments Brief	3.00	1,275.00
07/26/2019	ZEJ	Continued work on Closing Arguments Brief; Conferred with RKS re: same	5.25	2,231.25
	RKS	Conferred w/ ZEJ re:	0.50	275.00
07/27/2019	ZEJ	Continued work on Closing Arguments Brief	3.50	1,487.50
07/28/2019	RKS	Worked on Stan Section of Response Brief.	2.00	1,100.00
	ZEJ	Continued work on Closing Arguments Brief	3.00	1,275.00
07/29/2019	ZEJ	Continued work on Closing Arguments Brief	6.00	2,550.00
07/30/2019	BPH	Conferred w/ ZEJ re: Reviewed and revised RKS' section re: Stan Jaksick; Multiple conferences w/ ZEJ re: same, trust relationship, compensatory v. equitable relief and arguments; Searched for and reviewed equitable relief cases in Nevada; Multiple conferences w/ ZEJ re:	2.25	787.50
	ZEJ	Continued work on Closing Arguments Brief	8.25	3,506.25
07/31/2019	BPH	Conferred w/ RKS re: (	0.25	87.50
	ZEJ	Finalized and filed Closing Arguments Brief	8.50	3,612.50
	RKS	Working on Jaksick Closing Arguments Brief	9.00	4,950.00
	BOS	Reviewed Hascheff Trial Testimony for knowledge in 2012 issue for preparation of Responsive Brief	0.75	187.50
For Current Services Rendered			1760.25	803,668.75
Total Non-billable Hours			0.50	

RECAPITULATION

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
R. Kevin Spencer	664.00	\$550.08	\$365,250.00
Brendan Harvell	23.25	350.00	8,137.50

Wendy Jaksick  
Account No. 2645.00

Statement Date: 05/12/2020  
Statement No. 4988  
Page No. 30

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Zachary E. Johnson	944.75	425.00	401,518.75
Kenia Castillo	15.50	100.00	1,550.00
Bill Ucherek	8.50	500.00	4,250.00
Jack Cox	31.00	150.00	4,650.00
Blake Owen Spencer	73.25	250.00	18,312.50

Total Current Work 803,668.75

BALANCE DUE \$803,668.75

# EXHIBIT 3

# EXHIBIT 3

# **Zachary E. Johnson**

## **SPENCER & JOHNSON, PLLC**

500 N. Akard St., Suite 2150  
Dallas, Texas 75201-3302  
(214) 965-9999  
(214) 965-9500 - Fax  
zach@dallasprobate.com

### **EDUCATION:**

SMU DEDMAN SCHOOL OF LAW, *Cum Laude*, Dallas, Texas – Juris Doctorate, 2009  
COLUMBIA UNIVERSITY, New York, New York – B.A. in Economics, 2004  
HIGHLAND PARK HIGH SCHOOL, Dallas, Texas – High School Diploma, 2000

### **PROFESSIONAL ACTIVITIES:**

PARTNER, SPENCER & JOHNSON, PLLC, Dallas, Texas – January 1, 2018 – Present  
ASSOCIATE, SPENCER LAW, P.C., Dallas, Texas – September 1, 2011 – December 31, 2017  
ASSOCIATE, SPENCER & WATERBURY, L.L.P., Dallas, Texas – January 8, 2010 – August 31, 2011

Licensed to practice law by the State Bar of Texas, November 6, 2009

### **CERTIFICATIONS:**

Certified, Attorney Ad Litem, April 2010 – Present

### **HONORS/RECOGNITIONS:**

Super Lawyers – *Rising Star* – 2016 – 2020  
D Magazine – *Best Lawyers Under 40* - 2020  
Graduated *Cum Laude* – SMU DEDMAN SCHOOL OF LAW

### **PRACTICE AND BIOGRAPHICAL INFORMATION:**

As a partner of SPENCER & JOHNSON, PLLC, Zach practices in litigation and appeals in all Texas Courts with a focus on all aspects of probate, trust, fiduciary and guardianship litigation and estate administration, including will contests, trust contests and disputes, guardianship contests and disputes, fiduciary liability, as well as ancillary probate jurisdiction litigation, heirship and paternity-inheritance disputes, common-law spouse disputes, civil litigation and civil appeals.

**ASSOCIATIONS/ACTIVITIES:**

Texas State Bar – 2009

Dallas Bar Association – 2009

- Probate Section Member – 2010
- Community Involvement Committee Member – 2015 - 2017

Texas Trial Lawyers Association – 2013 - 2015

Dallas Association of Young Lawyers – 2009

Attorney, Dallas Volunteer Attorney Program – 2010

Ministerio Next Generation – 2014, 2015

**Jayne Ferretto**

---

**From:** eflex@washoecourts.us  
**Sent:** Tuesday, May 12, 2020 4:51 PM  
**To:** Kent Robison  
**Cc:** Jayne Ferretto  
**Subject:** NEF: CONS: TRUST: SSJ'S ISSUE TRUST: Supplemental ...: 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:** 05-12-2020:16:49:04  
**Clerk Accepted:** 05-12-2020:16:50:09  
**Court:** Second Judicial District Court - State of Nevada  
Civil  
**Case Title:** CONS: TRUST: SSJ'S ISSUE TRUST  
**Document(s) Submitted:** Supplemental ...  
- \*\*Continuation  
**Filed By:** Mark Connot

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

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

---

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

**The following people were served electronically:**

SARAH FERGUSON, ESQ. for SSJ'S ISSUE TRUST, SAMUEL S. JAKSICK, JR. FAMILY TRUST, STANLEY JAKSICK  
KENT RICHARD ROBISON, ESQ. for INCLINE TSS, LTD., DUCK LAKE RANCH LLC, SAMMY SUPERCUB, LLC, SERIES A, TODD B. JAKSICK  
PHILIP L. KREITLIN, ESQ. for SAMUEL S. JAKSICK, JR. FAMILY TRUST, STANLEY JAKSICK  
CAROLYN K. RENNER, ESQ. for MICHAEL S. KIMMEL, KEVIN RILEY, TODD B. JAKSICK  
DONALD ALBERT LATTIN, ESQ. for MICHAEL S. KIMMEL, KEVIN RILEY, TODD B. JAKSICK  
STEPHEN C. MOSS, ESQ. for SAMUEL S. JAKSICK, JR. FAMILY TRUST, STANLEY JAKSICK  
MARK J. CONNOT, ESQ. for WENDY A. JAKSICK  
ADAM HOSMER-HENNER, ESQ. for STANLEY JAKSICK

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

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

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

MARK J. CONNOT (10010)  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899 telephone  
(702) 597-5503 fax  
mconnot@foxrothschild.com

R. KEVIN SPENCER (*Admitted PHV*)  
Texas Bar Card No. 00786254  
ZACHARY E. JOHNSON (*Admitted PHV*)  
Texas Bar Card No. 24063978  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasprobate.com  
zach@dallasprobate.com  
*Attorneys for Respondent/Counter-Petitioner*  
Wendy A. Jaksick

**SECOND JUDICIAL DISTRICT COURT**

**WASHOE COUNTY, NEVADA**

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

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

In the Matter of the Administration 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; AND STANLEY S. JAKSICK,  
INDIVIDUALLY AND AS CO-TRUSTEE OF  
THE SAMUEL S. JAKSICK, JR. FAMILY  
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.

**OPPOSITION TO TODD B.  
JAKSICK'S MOTION TO AMEND  
THE JUDGMENT**



1  
2 Wendy A. Jaksick (“Wendy”) files this *Opposition* (the “Opposition”), opposing the  
3 *Todd B. Jaksick’s Motion to Amend Judgment* (“Motion”), which was filed by Todd Jaksick,  
4 in his Individual capacity (“Todd” or “Movant”). Wendy’s *Opposition* is based upon the  
5 papers and pleadings on file and the following memorandum of points and authorities. As set  
6 forth below, the Court should deny Todd’s *Motion*.

## 7 8 I. ARGUMENT AND AUTHORITIES

### 9 A. Background.

10 On August 2, 2017, Todd Jaksick (“Todd”) and Michael Kimmel (“Kimmel”), in their  
11 capacities as Co-Trustees of the Family Trust, (collectively, “Petitioners”) filed *Petitions for*  
12 *Confirmation of Trustees and Admission of Trust to the Jurisdiction of the Court, and for Approval*  
13 *of Accountings and Other Trust Administration Matters* (the “Petition”) instituting the current  
14 litigation involving the Family Trust and Wendy.

15 The *Petition* sought Court approval of purported trust accountings for the period April  
16 2013 through December 31, 2016 (the “Purported Trust Accounting”), as well as ratification and  
17 Court approval of numerous actions taken by Co-Trustees relieving Trustees from liability from  
18 such actions. *Petition* page 6. The *Petition* also sought approval of numerous agreements  
19 intended to modify the Family Trust and a release of all liability for actions taken pursuant to  
20 such agreements. *See Petition* page 12.

21 Stanley Jaksick (“Stanley”), in his capacity as Co-Trustee of the Family Trust, refused to  
22 join the Purported Trust Accountings and refused to join and pursue the *Petition*.<sup>1</sup> Instead, on  
23 October 10, 2017, Stanley filed an opposition to the *Petition* including objections to the approval  
24

---

25  
26  
27 <sup>1</sup> Stan did not prepare the Purported Accountings, did not sign the Purported Accountings, did  
28 not file the Purported Accountings for confirmation and did not sign the verifications of the  
Petition seeking confirmation of the Purported Accountings.

1 of the Purported Trust Accountings and other claims concerning the administration of the Family  
2 Trust. Stan, the third and only remaining Co-Trustee, did not just refuse to endorse the defective  
3 accountings by remaining silent, but affirmatively contested the very accountings filed by his Co-  
4 Trustees for Court approval; he knew they were insufficient. Stan's *Objection* specifically  
5 included Todd's purported Indemnification Agreement. *See Id.*, page 2, lines 9-11. The Jury and  
6 the Court were presented with evidence confirming Stan did not join in the Purported Accountings  
7 the Petition to approve the Accounting and specifically filed a lawsuit objecting to the Purported  
8 Accountings.  
9

10 As a result of the lawsuit, Wendy filed a Counter-Petition objecting to the efforts to  
11 obtain confirmation of the Purported Accounting and other actions of the Co-Trustee and  
12 included claims for breach of fiduciary duty and other actions of all of the Co-Trustees  
13 administering the Family Trust during the time period covered the claims in the *Petition*.  
14 Wendy opposed Co-Trustee Todd and Kimmel's request for confirmation of the  
15 Indemnification Agreements and ACPAs in their Petition and sought to invalidate the same.  
16 Wendy also sued all the Trustees in their individual capacities to ensure any judgment payable  
17 or enforceable against the Trustees in their Individual capacities would be valid and  
18 enforceable.  
19

20 Prior to jury and equitable trials, the Court entered the *Pre-Trial Order Regarding Trial*  
21 *Schedule* ("Pre-Trial Order"), which established the procedure for the bifurcated trial of the  
22 legal and equitable claims. *See Pre-Trial Order*. The *Pre-Trial Order* confirmed that the  
23 "equitable issues" including the validity of the purported Indemnification Agreements and  
24 ACPAs would be tried in a sperate trial to the bench. *Pre-Trial Order*, page 4, line 18 – page  
25 5, line 16. During the jury trial evidence was presented concerning the purported  
26  
27  
28

1 Indemnification Agreement and ACPAs,<sup>2</sup> but the jury was repeatedly told that the Court would  
2 decide the validity of the purported Indemnification Agreement and ACPAs and that was not  
3 for them to consider or decide. *See Order After Equitable Trial*, page 14, lines 20-21.  
4 Consistent with this, the jury was not presented with a jury question concerning the validity of  
5 these documents. *See Verdict; Pre-Trial Order*.

6 The Court presided over a two-week jury trial on legal claims from February 14, 2019  
7 to March 4, 2019. Ultimately, the Jury returned a verdict after trial finding for Wendy against  
8 Todd Jaksick for breach of fiduciary duties as Trustee of the SSJ's Issue Trust and as Co-  
9 Trustee of the Family Trust and awarded Wendy \$15,000.00 in damages from Todd. *See Jury*  
10 *Verdict*.

12 On May 13, 2019, the Court began a bench trial to resolve the remaining equitable  
13 claims. The Parties agreed to conduct the equitable trial by submission of briefs, and the  
14 Parties' closing briefs were filed on July 31, 2019.

16 On March 12, 2020, this Court entered the *Order After Equitable Trial* including its  
17 findings, conclusions and rulings on the trial of the equitable claims.

18 On April 29, 2020, Todd filed the *Motion*, requesting the Court amend the *Judgment*  
19 to delete: (i) the requirement that he disgorge his Trustees' fees and (ii) the requirement he pay  
20 attorney's fees to the Trusts or any other party.

21 **B. The Court's Treatment of Todd Is Not Inconsistent with Jury Verdict.**

22 Todd argues his constitutional rights have been violated because the Court disregarded  
23 the *Jury Verdict* in awarding equitable relief against Todd, which Todd alleges is punitive and  
24 resembles an award of damages. *See Motion*, page 11, lines 7-8. In further support of his  
25

26 \_\_\_\_\_  
27 <sup>2</sup> The *Pre-Trial Order* directed the Parties "present evidence relevant to all legal issues. To the  
28 extent this evidence is relevant to equitable issues, this Court shall simultaneously consider it for  
this purpose." *Pre-Trial Order*, page 4, lines 13-15.

1 position, Todd further argues the equitable remedies ordered by the Court against Todd,  
2 Individually, cannot be damages because the award of consequential damages was the jury's  
3 responsibility and the jury awarded \$15,000. *See Id.*

4         It is undisputed that this lawsuit involved the trial of both legal and equitable claims.  
5 Prior to jury and equitable trials, the Court entered the *Pre-Trial Order Regarding Trial*  
6 *Schedule* ("Pre-Trial Order"), which established the procedure for the trial of the legal and  
7 equitable claims. *See Pre-Trial Order*. The *Pre-Trial Order* provided for a trial to the jury on  
8 the Legal Claims and a trial to the bench on the Equitable Claims. *See Id.* The Court based  
9 this procedure on authority confirming in Nevada, the constitutional right to a jury trial does  
10 not extend to equitable matters. *See Id.*, page 3, lines 3-7 (citing *Harom v. Tanner Motor Tours*,  
11 79 Nev. 4, 20, 377 P.2d 622, 630 (1963); *Musgrave v. Casey*, 68 Nev. 471, 474, 235 P.2d 729,  
12 731 (1951) ("It is elemental that in a suit in equity the judgment or decree must be based upon  
13 finding of the court rather than a jury verdict.") (emphasis added).  
14

15         The *Pre-Trial Order* specifically confirmed that the "equitable issues," would be tried  
16 to the bench during the trial of the Equitable Claims. *Pre-Trial Order*, page 4, line 18 – page  
17 5, line 16. The *Pre-Trial Order* further required the Parties to "present evidence relevant to  
18 all legal issues. To the extent this evidence is relevant to equitable issues, this Court shall  
19 simultaneously consider it for this purpose." *Pre-Trial Order*, page 4, lines 13-15. Todd, in  
20 his Individual capacity, did not object to the procedure outlined in *Pre-Trial Order* for the trial  
21 of the legal and equitable claims and did not object to the procedure at or during trial.  
22

23         Consistent with the *Pre-Trial Order*, the legal claims were tried to the jury. At the  
24 conclusion of the Jury Trial, the Jury was provided a fifty-one (51) page Jury Instruction and  
25 a Verdict form. The Verdict form asked the jury if Wendy had proven the following claims  
26 against the various Parties:  
27  
28

- a) Breach of Fiduciary Duty,
- b) Civil Conspiracy and Aiding and Abetting,
- c) Aiding and Abetting Breach of Fiduciary Duty, and
- d) Fraud.

*Verdict Form*, pages 2-3. No other claims were included on the Verdict form. The Verdict form then included the following question to be answered if the jury found Wendy had proven any of the above claims:

We, the jury, duly impaneled in the above-entitled action, having found in favor of Petitioner, Wendy Jaksick, on one or more of her claims against one or more of the Respondents, find that she has proven by a preponderance of evidence the amount of her damages, assesses her damages to be \$\_\_\_\_\_.

*Jury Verdict*, page 4, lines 1-5 (emphasis added).

Based on the *Jury Verdict* returned by the Jury on March 4, 2020, the jury found Todd, as Trustee of the Family Trust and Trustee of the SSJ's Issue Trust, had breached his fiduciary duties to Wendy and found that Wendy had been damaged \$15,000 by such breaches. *Jury Verdict*. The jury's award of damages were to compensate Wendy, personally, for the damages cause by Todd's breaches.

The jury was not asked and did not consider the claims for equitable relief. Nevada authority is clear, that granting and fashioning of appropriate equitable relief exclusively within the providence of the Court. *Harom v. Tanner Motor Tours*, 79 Nev. 4, 20, 377 P.2d 622, 630 (1963); *Musgrave v. Casey*, 68 Nev. 471, 474, 235 P.2d 729, 731 (1951).

Equitable remedies are not damages (or punitive damages). In the context of trusts, the purpose of equitable remedies is to restore the trust to what it would have been had the breach or mismanagement not occurred. *RESTATEMENT (THIRD) OF TRUSTS* § 100 (2012). "A court of equity, having jurisdiction over the administration of trust, will give the beneficiaries of a trust

1 such remedies as are necessary for the protection of their interests.” *Scott on Trusts* (Fourth  
2 Edition), §199 (emphasis added). The focus of equitable remedies is the protection and restoration  
3 of the trust and the beneficiaries’ interest in the trust, not the recovery of compensation by  
4 beneficiaries in their personal capacities. In fact, the Court may grant equitable relief even in cases  
5 where there are not damages. *Barnes v. Sabron*, 10 Nev. 217 (1875) (where, in an equitable  
6 action, a clear violation by a defendant of plaintiff’s right is shown, a plaintiff, in order to be  
7 entitled to equitable relief, need no show that he suffered actual damage); *Burrow v. Arce*, 997  
8 S.W.2d 229, 245 (Tex. 1999); *Kinzbach Tool Co. v. Corbett-Wallace Corp.*, 160 S.W.2d 509  
9 (Tex. 1942); see also *RESTATEMENT (THIRD) OF AGENCY* § 801 cmt. d (2006).

11 NRS 153.031 permits the court to redress a breach of trust using its “full equitable  
12 powers.” See *Diotallevi v. Sierra Dev. Co.*, 95 Nev. 164, 591, P.2d 270, 272 (Nev. 1979). The  
13 Supreme Court of Nevada has expressly stated that District Courts have full discretion to  
14 fashion and grant equitable remedies, and courts’ decisions granting, denying and fashioning  
15 equitable remedies are reviewed will only be set aside on a finding of abuse of discretion. See  
16 *Am. Sterling Bank v. Johnny Mgmt. LV, Inc.*, 126 Nev. 423, 428, 245 P.3d 535, 538 (2010)  
17 (“district courts have full discretion to fashion and grant equitable remedies”). “An abuse of  
18 discretion occurs if the district court’s decision is arbitrary or capricious or if it exceeds the  
19 bounds of law or reason.” *Id.* at 538–39.

21 Nevada specifically provides the Court with the following equitable remedies when a  
22 breach of fiduciary duty is found, “the court may, in its discretion, order any or all of the  
23 following additional relief if the court determines that such additional relief is appropriate to  
24 redress or avoid an injustice: (a) Order a reduction in the trustee’s compensation[, and] (b)  
25 Order the trustee to pay to the petitioner or any other party all reasonable costs incurred by the  
26 party to adjudicate the affairs of the trust pursuant to this section, including, without limitation,  
27  
28

1 reasonable attorney's fees." NRS 153.031 (3) (emphasis added). The court may hold the trustee  
2 personally liable for the payment of such costs when the trustee was negligent in the  
3 performance of or breached his or her fiduciary duties. NRS 153.301(3)(b).

4       Todd, in his capacities as Trustees, initiated this litigation to confirm the Purported  
5 Accountings, the ACPAs, the Indemnification Agreements and to otherwise approve of his  
6 administration and absolve himself from liability for the time period covered by the Purported  
7 Accountings. Wendy responded seeking to enforce her rights, obtain instructions, and remedy  
8 breaches of fiduciary duties. The jury agreed with Wendy that Todd had breached his fiduciary  
9 duties. *Jury Verdict; Order After Equitable Trial*, p. 15, lines 16-17. The Court refused to  
10 confirm Todd's accountings.<sup>3</sup> *Order After Equitable Trial*, p. 24, line 19. The Court refused  
11 to confirm Todd's ACPAs and the Indemnification Agreements. *Order After Equitable Trial*,  
12 p. 24, line 27.  
13

14       Although the jury concluded Wendy was only personally damaged by Todd's breaches  
15 in the amount of \$15,000, the Court is not and cannot be limited or restrained by this award in  
16 granting and fashioning equitable remedies. The Court's role in this regard is to protect the  
17 Trusts and all of the beneficiaries of the trusts when breach of mismanagement is found. The  
18 equitable remedies ordered against Todd were within the Court's discretion and should be  
19 considered more than reasonable from Todd's perspective.  
20

21       1) Attorneys Fees. The Trusts spent approximately \$2 million in attorney's fees  
22 defending the Trustees against Wendy's and Stan's lawsuits. As a result of the jury finding  
23

---

24  
25       <sup>3</sup> The Court "agree[d] with Wendy that the accountings fail to provide adequate notice because  
26 they reveal only a portion of Sam's complex affairs," "the accountings created confusion and  
27 engendered suspicion," and :should have included more explanatory details." *Order After*  
28 *Equitable Trial*, p. 13, lines 11-17.

1 that Todd breached his fiduciary duties, the Trusts should not bear the burden of the significant  
2 legal fees and costs incurred to defend Todd. *See, e.g., Estate of Bowlds*, 120 Nev. 990, 102  
3 P.3d 593 (Dec. 2004) (Citing *Matter of Estate of Rohrich*, 496 N.W.2d 566, 571 (N.D.  
4 1993) (An attorney's services must benefit the estate to justify compensation from estate  
5 assets); *See also Sierra v. Williamson*, 784 F. Supp. 2d 774, 777 (W.D. Ky. 2011) ("[W]hether  
6 a trustee is entitled to attorney's fees from the trust corpus is not a matter of right, but is  
7 warranted where the trustees were not at fault in the litigation and the amount of attorney  
8 expenses was reasonable . . . the Court believes that the proper procedure is to allow [the  
9 trustees] to seek reimbursement from the Trust after the conclusion of this case, assuming [the  
10 trustees] are successful and their expenses reasonable."); *See also Jacob v. Davis*, 128 Md.  
11 App. 433, 466, 738 A.2d 904, 921 (1999) ("The general rule is that a trustee is entitled to  
12 attorneys' fees paid from the trust *if it successfully defends* an action brought by the  
13 beneficiary.") (citations omitted; emphasis added); RESTATEMENT (THIRD) OF TRUSTS § 88,  
14 cmt. d ("*To the extent the trustee is successful* in defending against charges of misconduct, the  
15 trustee is normally entitled to indemnification for reasonable attorneys' fees and other costs")  
16 (emphasis added).

17  
18  
19 The Court was more than justified in fashioning its equitable remedy requiring Todd,  
20 Individually, to reimburse the Trusts twenty-five (25%) of the Trusts' attorney's fees. It would  
21 be inequitable and unjust to all of the beneficiaries of the Trusts, including Sam's  
22 grandchildren and great grandchildren, for the Trusts to pay Todd's attorney's fees for his  
23 defense when he was found to have breached his fiduciary duties. The application of equity  
24 to restore the Trusts was not presented to and considered by the jury, this consideration and  
25 determination are solely within the providence and discretion of the Court.  
26  
27  
28



1           2) Disgorgement of Trustees' Fees. Todd received compensation for  
2 administering the Trusts. The Court's equitable remedy denying and disgorging Todd's  
3 Trustees' fees is not an award of damages to Wendy, personally, and is not in the nature of an  
4 additional penalty for his breach, but instead is based on the fact that Todd did not properly  
5 render services for which compensation it given. *See RESTATEMENT (THIRD) OF TRUSTS* §243;  
6 *Anderson v. Senior Guidance, Inc. (In re Estate of Anderson)*, 128 Nev. 906, 381 P.3d 624,  
7 (Nev. 2012). The jury found Todd breached his fiduciary duties in administering the Trusts.  
8 *Jury Verdict.* This jury finding confirms Todd did not properly render services to the Trusts.  
9 No speculation is required by the Court to reach this conclusion. As discussed above, it would  
10 be inequitable and unjust to the Trusts and their beneficiaries if Todd were to be paid  
11 compensation in the face of such finding.  
12

13           The Trusts and all of the beneficiaries of the Trusts were harmed by Todd's breach of  
14 fiduciary duties, and the Court is empowered to protect and restore the Trusts through the  
15 application of its equitable remedies. Todd seeks to bind the Court's hands, arguing the  
16 Court's application and award of equitable remedies protecting/restoring the Trusts diluted and  
17 altered the jury's verdict. If Todd's argument was the law, the Court's role to determine  
18 equitable claims necessary to protect Trusts and their beneficiaries would be completely  
19 eliminated whenever a beneficiary did not recover "enough" consequential damages. That is  
20 not and cannot be the law.  
21

22           **C. Wendy's Claims Against Todd, in His Individual Capacity, Were Brought**  
23 **in Good.**  
24

25           Todd's allegation that Wendy's claims against Todd were brought without reasonable  
26 ground of to harass Todd is addressed extensively in Wendy's *Motion to Amend Judgment*, filed  
27  
28

1 on April 29, 2020. *See Motion to Amend Judgment*, pages 2-7 and 11-24. Wendy hereby  
2 incorporates as if fully set forth herein pages 2-7 and 11-24 of her *Motion to Amend Judgment*.

3 The Court concluded in the *Order After Equitable Trial* that Wendy's claims against  
4 Todd in his capacities as trustees were brought in good faith. *See Order After Equitable Trial*,  
5 page 19, lines 6-7. The Court supported its conclusion stating, "Wendy's concerns are  
6 countenanced, in large part, by the questions raised by the accountings, Stan's separate  
7 allegations against Todd, document anomalies, and the optics of Todd's disproportionate benefit  
8 from Sam's business and trust affairs." *Id.*, page 19, lines 8-10.

10 Because Wendy's claims against Todd in his capacities as Trustees were brought in good  
11 faith and Todd had exposure to satisfy some or all of the liability for these claims in his Individual  
12 capacity (and in fact was a necessary party in his Individual capacity to obtain a valid and  
13 enforceable judgment), the good faith finding must also apply to Wendy's decision to bring and  
14 maintain her claims against Todd, in his Individual capacity.

15  
16 **D. Todd's Motion to Amend Confirms Trust Disfunction.**

17 Co-Trustees Todd and Stan, ostensibly, claimed to have settled all disputes between them  
18 before trial. At trial, they downplayed their prior disputes that resulted in Stan's lawsuit as  
19 normal disagreements between brothers and trustees. They minimized these disputes and Stan's  
20 lawsuit against Todd by representing to the jury that their disputes were resolved through  
21 negotiation prior to trial at the Court's direction. This made them look reasonable to the jury  
22 and bolstered their position that Wendy's complaints were all baseless. All of this occurred at  
23 Wendy's expense.

25 Todd's *Motion to Amend* confirms the Trustees painted a far rosier picture to the jury and  
26 the Court than what actually happened and the state of their settlement. In addition to other nasty  
27 allegations against Stan, Todd alleges that Stan was not being fair to the Family Trust by refusing  
28

1 to distribute funds from Montreux to the Family Trust. *Motion*, page 7, 19-20. Todd further  
2 confirms this is a “crisis that still exists.” *Motion*, page 7, 19-20. If Todd’s nasty allegations  
3 against Stan in the *Motion to Amend* are true, why did Todd settle with Stan, how did the Trusts  
4 benefit from the settlement, why has Todd not sought to remove Stan as Co-Trustee, and what  
5 do the Co-Trustees intend to do now to force Stan to distribute the funds owed the Family Trust?  
6

7 Additionally, the nasty allegations in Todd’s *Motion to Amend* further confirm Todd and  
8 Stan were using Wendy, their beneficiary who was desperate for money, as a pawn in their efforts  
9 personally outmaneuver each other to acquire greater personal benefit for themselves and their  
10 entities.

11 Finally, Todd’s *Motion to Amend* seeks to eliminate the requirements in the *Judgment*  
12 that Todd, Individually, pay the Trusts approximately \$500,000 or more. *Motion*, page 3, lines  
13 2-3. The equitable awards were assessed against Todd, Individually, as a result of his breach  
14 fiduciary duties in administering the Trusts. If these awards are eliminated, the Trusts will not  
15 recover the \$500,000 or more awarded to restore the Trusts. The Trustees have an obligation to  
16 oppose Todd’s *Motion to Amend* and to file oppositions in order to preserve these awards for the  
17 Trusts. Their failure to do so confirms they are more concerned about helping and protecting  
18 Todd than the Trusts and their beneficiaries.  
19

20 This Trust disfunction and animus by and between Wendy’s Trustees is the same  
21 disfunction that has been going on for years prompting Wendy to file her countersuit.  
22 Unfortunately, this disfunction continues, has apparently become the norm and will continue to  
23 harm the Trusts and their beneficiaries.  
24

### 25 CONCLUSION

26 For the reasons set forth above, Wendy respectfully requests the court to deny the *Motion*  
27 *to Amend Judgment*.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**AFFIRMATION STATEMENT**

Pursuant to NRS 239B.030

The undersigned does hereby affirm that this **OPPOSITION TO TODD B. JAKSICK'S MOTION TO AMEND JUDGMENT** filed by Wendy A. Jaksick in the above-captioned matter does not contain the social security number of any person.

DATED this 13<sup>th</sup> day of May, 2020.

**FOX ROTHSCHILD LLP**

/s/ Mark J. Connot

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SPENCER & JOHNSON, PLLC**

/s/ R. Kevin Spencer

R. Kevin Spencer (*Admitted PHV*)  
Zachary E. Johnson (*Admitted PHV*)  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
*Attorneys for Respondent/Counter-Petitioner*  
*Wendy A. Jaksick*

**CERTIFICATE OF SERVICE**

Pursuant to NRCp 5(b), I certify that I am an employee of FOX ROTHSCHILD LLP and that on this 13<sup>th</sup> day of May, 2020, I served a true and correct copy of **OPPOSITION TO TODD B. JAKSICK'S MOTION TO AMEND JUDGMENT** by the Court's electronic file and serve system addressed to the following:

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

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

Phil Kreitlein, Esq.  
Kreitlein Law Group  
1575 Delucchi Lane, Ste. 101  
Reno, NV 89502  
*Attorneys for Stanley S. Jaksick, Co-Trustee  
Samuel S. Jaksick, Jr. Family Trust*

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

DATED this 13<sup>th</sup> day of May, 2020.

/s/ Doreen Loffredo  
An Employee of Fox Rothschild LLP

**CODE: 2645**  
Adam Hosmer-Henner, Esq. (NSBN 12779)  
McDONALD CARANO  
100 West Liberty Street, 10th Floor  
Reno, Nevada 89501  
Telephone: (775) 788-2000  
[ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)  
*Attorneys for Stanley Jaksick,*  
*Co-Trustee of the Family Trust*

**IN 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  
SSJ ISSUE TRUST,

**CASE NO.: PR17-00445**

**DEPT. NO.: 15**

**CASE NO.: PR17-00446**

**DEPT. NO.: 15**

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

**OPPOSITION TO WENDY JAKSICK'S MOTION TO ALTER OR AMEND**

**JUDGMENT OR, ALTERNATIVELY MOTION FOR NEW TRIAL**

**I. INTRODUCTION**

The sole point of error assigned by Wendy Jaksick's Motion to Alter or Amend Judgment, Or Alternatively Motion for New Trial ("Motion"), with respect to Stan Jaksick, relates to his indemnification agreement. Mot. 2.<sup>1</sup> Wendy's sole argument, relying heavily on statements made by Todd Jaksick's individual counsel, is that the Court erred with respect to the procedure of the legal and equitable trials. Wendy does not identify or challenge any actual transactions related to this indemnification agreement or show how it caused her any loss or harm in any way.

---

<sup>1</sup> Stanley Jaksick joins in the other oppositions filed by the co-Trustees of the Family Trust to the extent their arguments relate to his asserted interests or capacity as co-Trustee.

1 Without presenting any new evidence with respect to Stan's indemnification  
2 agreement and without showing that the Court's conclusion was incorrect with respect to the  
3 same, there is no basis to alter or amend the Court's judgment even if Wendy is procedurally  
4 correct. As the jury did not find any liability or breach by Stan and the Court did not find  
5 any evidentiary basis to invalidate Stan's indemnification agreement, the ultimate  
6 conclusion should remain undisturbed.

## 7 **II. LEGAL STANDARD**

8 Wendy Jaksick moves this Court pursuant to NRCP 59 for relief from this Court's  
9 Judgment. NRCP 59(a) sets forth grounds for a new trial and NRCP 59(e) states that a "motion  
10 to alter or amend a judgment must be filed no later than 28 days after service of written notice of  
11 entry of judgment." The grounds for granting such a motion have been developed by the Nevada  
12 Supreme Court and identified as (1) "correct[ing] manifest errors of law or fact," (2) "newly  
13 discovered or previously unavailable evidence," (3) the need "to prevent manifest injustice," or  
14 (4) a "change in controlling law." *AA Primo Builders, LLC*, 126 Nev. at 582 (internal quotations  
15 and citations omitted). Further, the Nevada Supreme Court recognized that consulting "federal  
16 law in interpreting [Rule 59(e) motions]" was appropriate. *Id.*

17 Motions made under Rule 59(e) "should not be granted absent highly unusual  
18 circumstances." 389 *Orange St. Partners v. Arnold*, 179 F.3d 656, 665 (9th Cir. 1999).  
19 A motion to alter or amend judgment under Rule 59(e) is "an extraordinary remedy which should  
20 be used sparingly." *Stevo Design, Inc. v. SBR Mktg. Ltd.*, 919 F. Supp. 2d 1112, 1117 (D. Nev.  
21 2013) (quoting *McDowell v. Calderon*, 197 F.3d 1253, 1255 n. 1 (9th Cir. 1999)).

## 22 **III. ARGUMENT**

23 In her Post-Trial Brief, Wendy argues that Stan's Indemnification Agreement was  
24 invalid and unenforceable because:

25 "a. Sam never knew about it, did not understand it or, at least, had no idea about its  
26 application;

27 b. it was never validly signed;

28 c. that Stan never knew about Stan's Indemnification Agreement until, at the earliest,



1           2015;

2           *d. that no “Exhibit A” was attached, so nothing specific was indemnified;*

3           *e. it was supposedly signed – SEE SIGNATURE LINE – by Sam in only two*  
4           *capacities, (1) Individually and (2) as “trustee of Samuel S. Jaksick, Jr. Family Trust*  
5           *Agreement dated June 29, 1996”;* *therefore, since no June 29, 1996 trust exists, it*  
6           *is only binding, if at all, upon his Estate, which was closed many years ago.”*

7 Wendy Jaksick’s Brief of Opening Arguments in the Equitable Claims Trial, July 1, 2019,  
8 59. These arguments are either unevidenced or immaterial technicalities and were presented  
9 or could have been presented to both the Court and the jury by Wendy. The plain language  
10 of the document speaks for itself and in the absence of a live dispute as to whether the  
11 Indemnification Agreement applies to a specific transaction, there is no case or controversy  
12 as to how to interpret the document or resolve it one way or the other.

13           “Amendment or alteration is appropriate under Rule 59(e) if (1) the district court is  
14 presented with newly discovered evidence, (2) the district court committed clear error or  
15 made an initial decision that was manifestly unjust, or (3) there is an intervening change in  
16 controlling law. *School Dist. No. 1J, Multnomah County v. ACandS, Inc.*, 5 F.3d 1255, 1263  
17 (9th Cir. 1993). As Wendy does not present any newly discovered evidence, she appears to  
18 be relying on the second prong and arguing that the Court committed “clear error” or made a  
19 decision that was “manifestly unjust.” *Id.*

20           In order to qualify for NRCP 59 relief, Wendy must be able to show that the Court’s  
21 conclusion with respect to Stan’s Indemnification Agreement was procedurally and  
22 substantively incorrect. The only harmful error identified by Wendy is that “the Trustees or  
23 Todd, in his Individual capacity, to continuously argue the validity of the Indemnification  
24 Agreement and ACPAs are not for the jury to decide.” Mot. 9. This, however, is not what  
25 Stan’s counsel argued to the jury: “Stan had an Indemnification Agreement, didn’t know  
26 about it, didn’t use it, not involved in this case.” Mar. 4, 2019, Trial Tr. 86:11-13. Stan’s  
27 knowledge about the Indemnification Agreement does not affect its validity and Wendy  
28

1 cannot show why the Court's decision not to invalidate Stan's Indemnification Agreement is  
2 harmful to her or was error.

3 **II. CONCLUSION**

4 Based on the foregoing, Plaintiff respectfully requests the Court deny Wendy Jaksick's  
5 Motion to Alter or Amend Judgment Or, Alternatively Motion for New Trial with respect to  
6 Stanley Jaksick.

7 **Affirmation**

8 *The undersigned does hereby affirm that pursuant to NRS 239B.030 this document does*  
9 *not contain the social security number of any person.*

10 DATED: May 13, 2020

11 McDONALD CARANO

12  
13 By /s/ Adam Hosmer-Henner  
14 Adam Hosmer-Henner, Esq. (NSBN 12779)  
15 100 West. Liberty Street, 10th Floor  
16 Reno, Nevada 89501  
17 *Attorneys for Stanley Jaksick,*  
18 *Co-Trustee of the Family Trust*  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of McDONALD  
3 CARANO and that on May 13, 2020, I served the foregoing on the parties in said case by  
4 electronically filing via the Court's e-filing system. The participants in this case are registered e-  
5 filing users and notice of filing will be served on all parties by operation of the Court's CM/ECF  
6 system, and parties may access this filing through the Court's CM/ECF system.

7 Donald Lattin, Esq.  
8 Robert LeGoy, Esq.  
9 Brian C. McQuaid, Esq.  
10 Carolyn Renner, Esq.  
11 Maupin Cox & LeGoy  
12 4785 Caughlin Parkway  
13 Reno, NV 89520

Kent Robison, Esq.  
Therese M. Shanks, Esq.  
Robison, Sharp, Sullivan & Brust  
71 Washington Street  
Reno, NV 89503

11 Mark J. Connot, Esq.  
12 Fox Rothschild, LLP  
13 1980 Festival Plaza Drive, # 700  
14 Las Vegas, NV 89135

Philip L. Kreitlein, Esq.  
Kreitlein Law Group, Ltd.  
1575 Delucci Lane, Ste. 101  
Reno, NV 89502

14 R. Kevin Spencer, Esq.  
15 Zachary E. Johnson, Esq.  
16 Brendan P. Harvell, Esq.  
17 Spencer Law, P.C.  
18 500 N. Akard St., Suite 2150  
19 Dallas, TX 75201

20 I declare under penalty of perjury that the foregoing is true and correct.

21 DATED: May 13, 2020.

22 By /s/ Adam Hosmer-Henner  
23 An Employee of McDonald Carano  
24  
25  
26  
27  
28

1 **CODE: 3795**

Adam Hosmer-Henner, Esq. (NSBN 12779)

2 McDONALD CARANO

100 West Liberty Street, 10th Floor

3 Reno, Nevada 89501

Telephone: (775) 788-2000

4 [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)

*Attorneys for Stanley Jaksick,*

5 *Co-Trustee of the Family Trust*

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

7 **IN AND FOR THE COUNTY OF WASHOE**

8 \* \* \* \* \*

9 In the Matter of the Administration of the

10 SSJ ISSUE TRUST,

**CASE NO.: PR17-00445**

**DEPT. NO.: 15**

**CASE NO.: PR17-00446**

**DEPT. NO.: 15**

12 In the Matter of the Administration of the

13 SAMUEL S. JAKSICK, JR. FAMILY TRUST,

14  
15 **REPLY TO WENDY JAKSICK'S AMENDED OPPOSITION AND MOTION TO**

16 **STRIKE MEMORANDUM OF ATTORNEY'S FEES BY STANLEY JAKSICK AS**

17 **CO-TRUSTEE OF THE FAMILY TRUST**

18 **I. INTRODUCTION**

19 Both Wendy Jaksick and Todd Jaksick have objected to the Verified Memorandum  
20 of Attorneys' Fees filed by Stan and so it seems he is once again in the middle, despite only  
21 attempting to comply with this Court's Judgment. This Court ordered that "Counsel for the  
22 Trustees and Trustee shall submit verified Memoranda of Fees paid within twenty-one days  
23 of notice of entry of this judgment." Apr. 1, 2020, Judgment on Jury Verdict and Court  
24 Order on Equitable Claims. Stan complied with this Judgment by filing a Verified  
25 Memorandum of Attorney's Fees. The Court's Judgment makes Todd responsible "25% of  
26 the attorneys' fees paid by the Samuel S. Jaksick, Jr. Family Trust and SSJ's Issue Trust for  
27 legal services rendered on behalf of the Co-Trustees of the Samuel S. Jaksick, Jr., Family  
28 Trust and Trustee for the SSJ's Issue Trust." *Id.*

1           There is no basis for the Court to entertain any oppositions to the Verified  
2 Memorandum as it was not filed to initiate motion practice by to conclude the Court's  
3 Judgment.

## 4           **II. ARGUMENT**

5           This Court held that "Stanley Jaksick, as co-Trustee of the Family Trust, is represented  
6 by Adam Hosmer-Henner and Philip Kreitlein." Order After Equitable Trial, 2. The Court  
7 unequivocally held that "Stan Jaksick and Michael Kimmel's attorneys' fees be chargeable to the  
8 trust and paid from trust corpus." *Id.* at 17. Stan did not file a Verified Memorandum of  
9 Attorney's Fees for any purpose other than to comply with that portion of the Judgment, stating:  
10 "Counsel for the Trustees and Trustee shall submit verified Memoranda of Fees paid within  
11 twenty-one days of notice of entry of this judgment." Apr. 1, 2020, Judgment on Jury  
12 Verdict and Court Order on Equitable Claims. This requirement was put in by the Court in  
13 order to effectuate the Court's Judgment in "favor of the [Family Trust] and SSJ's Issue  
14 Trust against Todd Jaksick, as Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust in an  
15 amount equal to 25% of the attorneys' fees paid by" the two trusts. *Id.*

16           First, Stan is not seeking an award of attorney's fees against Wendy. This was clear  
17 from the Verified Memorandum as it stated specifically that it was filed only pursuant to  
18 Paragraph 3 of the Judgment.

19           Second, Stan did not include attorney's fees in his individual capacity in the Verified  
20 Memorandum. Wendy voluntarily dismissed her claims against Stan on August 25, 2018  
21 and Todd and Stan resolved their individual differences in January 2019, resulting in the  
22 substitution of Adam Hosmer-Henner as counsel for Stan in his capacity as co-Trustee. Only  
23 those fees for representing Stan as co-Trustee were included in the Verified Memorandum  
24 as is clear from the dates of the entries.

25           Third, Stan need not show that the fees were reasonably and necessarily incurred,  
26 even though they were, because he is not seeking these attorney's fees by order of the Court.  
27 He simply filed a Verified Memorandum indicating how many fees have been incurred and  
28 paid by the Trust (or should have been timely paid) related to this litigation.

1           **III.CONCLUSION**

2           Based on the foregoing, Stan simply asks this Court to acknowledge his attempt to  
3 comply with the Judgment. Should any additional information be required, Stan will submit  
4 further documentation upon request from the Court.

5   **Affirmation**

6           *The undersigned does hereby affirm that pursuant to NRS 239B.030 this document does*  
7 *not contain the social security number of any person.*

8           DATED: May 13, 2020

9   McDONALD CARANO

10  
11   By           /s/ Adam Hosmer-Henner            
12   Adam Hosmer-Henner, Esq. (NSBN 12779)  
13   100 West. Liberty Street, 10th Floor  
14   Reno, Nevada 89501  
15   Attorneys for Stanley Jaksick,  
16   Co-Trustee of the Family Trust  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of McDONALD  
3 CARANO and that on May 13, 2020, I served the foregoing on the parties in said case by  
4 electronically filing via the Court's e-filing system. The participants in this case are registered e-  
5 filing users and notice of filing will be served on all parties by operation of the Court's CM/ECF  
6 system, and parties may access this filing through the Court's CM/ECF system.

7 Donald Lattin, Esq.  
8 Robert LeGoy, Esq.  
9 Brian C. McQuaid, Esq.  
10 Carolyn Renner, Esq.  
11 Maupin Cox & LeGoy  
12 4785 Caughlin Parkway  
13 Reno, NV 89520

Kent Robison, Esq.  
Therese M. Shanks, Esq.  
Robison, Sharp, Sullivan & Brust  
71 Washington Street  
Reno, NV 89503

11 Mark J. Connot, Esq.  
12 Fox Rothschild, LLP  
13 1980 Festival Plaza Drive, # 700  
14 Las Vegas, NV 89135

Philip L. Kreitlein, Esq.  
Kreitlein Law Group, Ltd.  
1575 Delucci Lane, Ste. 101  
Reno, NV 89502

14 R. Kevin Spencer, Esq.  
15 Zachary E. Johnson, Esq.  
16 Brendan P. Harvell, Esq.  
17 Spencer Law, P.C.  
18 500 N. Akard St., Suite 2150  
19 Dallas, TX 75201

20 I declare under penalty of perjury that the foregoing is true and correct.

21 DATED: May 13, 2020.

22 By /s/ Adam Hosmer-Henner  
23 An Employee of McDonald Carano  
24  
25  
26  
27  
28

MARK J. CONNOT (10010)  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899 telephone  
(702) 597-5503 fax  
mconnot@foxrothschild.com

R. KEVIN SPENCER (*Admitted PHV*)  
Texas Bar Card No. 00786254  
ZACHARY E. JOHNSON (*Admitted PHV*)  
Texas Bar Card No. 24063978  
**SPENCER & JOHNSON, PLLC**  
500 N. Akard Street, Suite 2150  
Dallas, Texas 75201  
kevin@dallasprobate.com  
zach@dallasprobate.com  
*Attorneys for Respondent/Counter-Petitioner*  
Wendy A. Jaksick

**SECOND JUDICIAL DISTRICT COURT**

**WASHOE COUNTY, NEVADA**

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

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

In the Matter of the Administration 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; AND STANLEY S. JAKSICK,  
INDIVIDUALLY AND AS CO-TRUSTEE OF  
THE SAMUEL S. JAKSICK, JR. FAMILY  
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.

**WENDY JAKSICK'S REPLY IN  
SUPPORT OF HER MOTION TO  
ALTER OR AMEND JUDGMENT OR,  
ALTERNATIVELY, MOTION FOR  
NEW TRIAL**



1 Wendy A. Jaksick (“Wendy”), files this *Reply in Support of Her Motion to Alter or Amend*  
2 *Judgment or, Alternatively, Motion for New Trial* (the “Reply”).

3  
4 **REPLY**

5 **A. Wendy’s Motion Seeks to Prevent Manifest Injustice and Is Not Violation**  
6 **of the Seventh Amendment.**

7 Wendy’s Motion to Alter or Amend was not filed to relitigate the same issues, it was filed to  
8 prevent manifest injustice caused by irregularity of the proceedings concerning the validity of the  
9 ACPAs and purported Indemnification Agreements. *AA Primo Builders, LLC v. Washington*,  
10 126 Nev. 578, 582, 245 P.3d 1190, 1193 (2010) (“NRC 59(e) Among the basic grounds for  
11 a Rule 59(e) motion are correct[ing] manifest errors of law or fact, newly discovered or  
12 previously unavailable evidence, the need to prevent manifest injustice, or a change in  
13 controlling law.”) (internal quotations omitted) (emphasis added).

14 This Court bifurcated the trial of the legal and equitable claims and established the  
15 procedure for doing so in its *Pre-Trial Order Regarding Trial Schedule* (“Pre-Trial Order”).

16  
17 6. The parties shall present opening statements to the bench on any solely equitable  
18 issues not previously addressed, which include the following claims:

<i>Equitable Claims</i>	
<b>Claim</b>	<b>Petitioner</b>
Settlement and Approval of Trust Accountings (Issue Trust)	Todd
Settlement and Approval of Trust Accountings (Family Trust)	Todd and Mr. Kimmel
Failure to Disclose and Adequately Account to Compel Accounting (Issue and Family Trusts)	Wendy
Accounting (Issue Trust)	Stanley
Ratification and Approval of Agreements and Consents to Proposed Action (ACPAs) (Issue Trust)	Todd
Ratification and Approval of ACPAs (Family Trust)	Todd and Mr. Kimmel
Contest of Purported ACPAs (Issue and Family Trusts)	Wendy

Contest of Purported Indemnity Agreement (Issue and Family Trusts)	Wendy
Declaratory Judgment – No Contest Provision (Issue and Family Trusts)	Wendy
Unjust Enrichment and Constructive Trust (Issue and Family Trusts)	Wendy
Unjust Enrichment (Issue Trust)	Stanley
Confirmation of Todd as Trustee of the Issue Trust	Todd
Confirmation of Todd, Stanley, and Mr. Kimmel as Co-Trustees of the Family Trust	Todd and Mr. Kimmel
Removal of Trustees and Appointment of Independent Trustee(s) (Family and Issue Trusts)	Wendy
Removal of Trustee (Issue Trust)	Stanley
Removal of Co-Trustee (Family Trust)	Stanley
Disgorgement of Trustee Fees (Issue and Family Trusts)	Wendy
Surcharge (Issue Trust)	Stanley
Enjoin Trustees from Using Trust Assets to Defend in this Matter (Issue and Family Trusts)	Wendy
Restraint on Use of Trust Assets and Dissipation of Assets (Issue and Family Trusts)	Stanley
Award of Attorneys' Fees and Costs	Wendy

*Pre-Trial Order*, pages 4-5.

Throughout the Jury Trial, it was made absolutely clear to the jury that it was the Court's responsibility and role to decide the validity of the purported ACPAs and Indemnification Agreements because these issues were not for the jury to consider and decide. Todd's counsel Kent Robison specifically told the jurors that it was not their role to consider and decide on the validity of the ACPAs and Indemnification Agreements or anything to do with them. Mr. Robison made the following representation and argument to the jury:

**But, ladies and gentlemen, the scope, bindingness [sic], validity and effectiveness of that document is before Judge Hardy to be determined, yet they want to keep coming back to the Indemnification Agreement like the jury has something to do with it. I'm sorry, but you don't.**

1 Trial Transcript – 03/04/2019 – Page 66, Line 1-6 (emphasis added). The Court specifically  
2 confirmed and acknowledged these representations made to the jury in its *Order After Equitable*  
3 *Trial* stating, “the attorneys argued to the jury that this Court would decide the validity of the  
4 ACPAs and indemnification agreements...” *Order After Equitable Trial*, page 14, lines 20-21  
5 (emphasis added).  
6

7 Because it was made absolutely clear to the jury that it was not its role to consider and decide  
8 on the validity of the ACPAs and Indemnity Agreements, it is manifestly unjust for the Court to  
9 defer to the jury’s “implied rejection” of Wendy’s claims challenging the validity of the these  
10 documents. It is entirely possible the jury concluded some or all of the contested documents were  
11 invalid and formulated its verdict excluding such consideration, because it was made clear to the  
12 jury this determination was not its to make. As a result, for the Court to rely on the jury’s “implied  
13 rejection” and “constructive approval” to resolve the validity claims, requires the conclusion that  
14 the jury ignored its role and considered and made ultimate determinations outside of its role in  
15 formulating its verdict. This cannot be the case, the Court must presume the jury properly  
16 performed its role and only made the determinations it was instructed to make.  
17

18 **B. Invalidating ACPAs and Indemnifications Agreements Not Violation of**  
19 **Seventh Amendment.**

20 If the jury properly performed its role, it did not consider and determine the validity of these  
21 documents and its verdict did not include any explicit or implicit determination on the validity of  
22 these documents. Therefore, in fulfilling its role in determining the equitable claims, which is  
23 exclusively the providence of the Court, and concluding that the ACPAs and the Indemnification  
24 Agreements are invalid is not contrary to the jury’s implicit or explicit factual determinations and  
25 not a violation of Todd’s Seventh Amendment rights.  
26

27 If the jury did not properly perform its role and intended its verdict to reflect its  
28

1 determination concerning the validity of the Indemnification Agreements, such determinations must  
2 be limited to Wendy's claims for breach of fiduciary duty and fraud. These are the only claims that  
3 were presented to the jury for the jury's determination in the *Jury Verdict*. *Jury Verdict*. Because  
4 the jury did find Todd, in his capacities as Trustees, breach his fiduciary duties, the Court would be  
5 required to speculate that this finding did not apply to the ACPAs and Indemnification Agreements  
6 and validity of the ACPAs and Indemnification Agreements.

7  
8       Regardless, if the Court did not determine the Indemnification Agreements were invalid as  
9 a result of Todd's actions, the Court could and should have determined the Indemnification  
10 Agreements were invalid on other grounds. Wendy contested the validity of the Indemnification  
11 Agreements on the grounds that they were forged, altered or manufactured by Todd and possibly  
12 others... *Wendy's First Amended Counter-Petition*, page 14, lines 20-22 (emphasis added). Based  
13 on the evidence presented, it is clear these documents were altered/manufactured, backdated and  
14 purportedly executed without the exhibits of debts attached. *See Wendy's Opening Brief*, pages 42-  
15 46. The evidence presented at trial confirmed Pier Hascheff, who Todd repeatedly claimed was  
16 "Sam's attorney", (i) was responsible for preparing the Indemnification Agreements, (ii) was  
17 involved in getting the documents executed, (iii) testified to the irregularities in the documents, their  
18 preparation and execution, and (iv) admitted to changing the documents after they were purportedly  
19 signed. *See Id.*

20  
21       Based on Mr. Hascheff's testimony and the documentary evidence presented during the jury  
22 trial, the jury could have determined the Indemnification Agreements were invalid, but did not  
23 reflect same in their *Jury Verdict* because the invalidity of the documents was not caused by or a  
24 result of Todd's breaches of fiduciary duty or fraud. In other words, the jury could have determined  
25 the Indemnification Agreements were invalid because of Pierre Hascheff's actions including  
26 multiple document versions, the purported signing of drafts, replacement of signature pages,  
27  
28

1 document manipulation or because Sam did not sign the documents or the versions of the documents  
2 Todd offers as the current operative documents. If this is the case, this determination would not be  
3 reflected in the *Jury Verdict*, and accordingly a determination by the Court in its equitable role that  
4 the documents are invalid is not a violation of Todd's Seventh Amendment rights.

5 **C. Wendy's Individual Claims Brought in Good Faith and Todd No Entitled**  
6 **to Fees and Costs Under Rule 68.**

7 Todd's allegations that Wendy's claims against him in his Individual capacity were not  
8 brought in good faith and he is entitled to fees under Rule 68 were extensively briefed by Wendy in  
9 her *Motion*, her *Opposition to Motion for Order Awarding Costs and Attorneys' Fees for Todd*  
10 *Jaksick, Individually, for Trial on Equitable Claims* ("Wendy's Opposition to Todd's Order for  
11 Fees"), which was filed on April 23, 2020, and other recently filed papers. In Todd's *Response*,  
12 he cites authority in support of the proposition that "*attorney fees may not be awarded against*  
13 *a defendant in a capacity in which they are not sued.*" *Response*, page 8, line 13. This  
14 proposition is one of the very reasons Wendy sued Todd in his Individual capacity.  
15

16 Wendy believes the requirement to sue Todd, in his Individual capacity, to secure a valid  
17 and enforceable judgment against Todd in his Individual capacity is clear based on existing  
18 Nevada authority.<sup>1</sup> Todd has not cited any definitive authority confirming it was for Wendy to  
19 sue Todd, Individually, to secure a valid and enforceable judgment of damages or fees against  
20 Todd in his Individual capacity. Therefore, Wendy had a reasonable and good faith basis in law  
21 for suing Todd in his Individual capacity.  
22  
23  
24  
25  
26

---

27 <sup>1</sup> See authority cited in *Motion* and *Opposition to Motion for Order Awarding Costs and*  
28 *Attorneys' Fees for Todd Jaksick, Individually, for Trial on Equitable Claims.*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16

## 17

18  
19  
20

21  
22  
23

## 25

26

27

28

1 **MOTION FOR NEW TRIAL** filed by Wendy A. Jaksick in the above-captioned matter does  
2 not contain the social security number of any person.

3 DATED this 15<sup>th</sup> day of May, 2020.

4 **FOX ROTHSCHILD LLP**

5  
6 /s/ Mark J. Connot

7 Mark J. Connot (10010)  
8 1980 Festival Plaza Drive, Suite 700  
9 Las Vegas, Nevada 89135

10 **SPENCER & JOHNSON, PLLC**

11 /s/ R. Kevin Spencer

12 R. Kevin Spencer (*Admitted PHV*)  
13 Zachary E. Johnson (*Admitted PHV*)  
14 500 N. Akard Street, Suite 2150  
15 Dallas, Texas 75201  
16 *Attorneys for Respondent/Counter-Petitioner*  
17 *Wendy A. Jaksick*  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

Pursuant to NRCp 5(b), I certify that I am an employee of FOX ROTHSCHILD LLP and that on this 15<sup>th</sup> day of May, 2020, I served a true and correct copy of **WENDY JAKSICK'S REPLY IN SUPPORT OF HER MOTION TO ALTER OR AMEND JUDGMENT OR, ALTERNATIVELY, MOTION FOR NEW TRIAL** by the Court's electronic file and serve system addressed to the following:

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

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

Phil Kreitlein, Esq.  
Kreitlein Law Group  
1575 Delucchi Lane, Ste. 101  
Reno, NV 89502  
*Attorneys for Stanley S. Jaksick, Co-Trustee  
Samuel S. Jaksick, Jr. Family Trust*

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

DATED this 15<sup>th</sup> day of May, 2020.

/s/ Doreen Loffredo  
An Employee of Fox Rothschild LLP



1 **CODE: 3860**

2 Adam Hosmer-Henner, Esq. (NSBN 12779)  
3 McDONALD CARANO  
4 100 West Liberty Street, 10th Floor  
5 Reno, Nevada 89501  
6 Telephone: (775) 788-2000  
7 [ahosmerhenner@mcdonaldcarano.com](mailto:ahosmerhenner@mcdonaldcarano.com)  
8 *Attorneys for Stanley Jaksick,*  
9 *Co-Trustee of the Family Trust*

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

11 **IN AND FOR THE COUNTY OF WASHOE**

12 \* \* \* \* \*

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

**CASE NO.: PR17-00445**

**DEPT. NO.: 15**

**CASE NO.: PR17-00446**

**DEPT. NO.: 15**

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

17 **REQUEST FOR SUBMISSION – PROPOSED ORDER AWARDING COSTS**

18 Pursuant to this Court's April 30, 2020 Order Regarding Costs and Stanley Jaksick's  
19 March 17, 2020 Verified Memorandum of Costs, Stanley Jaksick, as Co-Trustee of the Family  
20 Trust, hereby respectfully requests that the Court enter the [Proposed] Order Awarding Costs,  
21 which is attached hereto as Exhibit 1.

22 **Affirmation**

23 The undersigned does hereby affirm that pursuant to NRS 239B.030, the preceding  
24 document does not contain the social security number of any person.

25 DATED: May 18, 2020

26 McDONALD CARANO

27 By /s/ Adam Hosmer-Henner  
28 Adam Hosmer-Henner, Esq.  
100 West. Liberty Street, 10th Floor  
Reno, Nevada 89501

*Attorneys for Stanley Jaksick,*  
*Co-Trustee of the Family Trust*

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of McDONALD  
3 CARANO and that on May 18, 2020, I served the foregoing on the parties in said case by  
4 electronically filing via the Court's e-filing system. The participants in this case are registered e-  
5 filing users and notice of filing will be served on all parties by operation of the Court's CM/ECF  
6 system, and parties may access this filing through the Court's CM/ECF system.

7 Donald Lattin, Esq.  
8 Robert LeGoy, Esq.  
9 Brian C. McQuaid, Esq.  
10 Carolyn Renner, Esq.  
Maupin Cox & LeGoy  
4785 Caughlin Parkway  
Reno, NV 89520

Kent Robison, Esq.  
Therese M. Shanks, Esq.  
Robison, Sharp, Sullivan & Brust  
71 Washington Street  
Reno, NV 89503

11 Mark J. Connot, Esq.  
12 Fox Rothschild, LLP  
13 1980 Festival Plaza Drive, # 700  
Las Vegas, NV 89135

Philip L. Kreitlein, Esq.  
Kreitlein Law Group, Ltd.  
1575 Delucci Lane, Ste. 101  
Reno, NV 89502

14 R. Kevin Spencer, Esq.  
15 Zachary E. Johnson, Esq.  
16 Brendan P. Harvell, Esq.  
Spencer Law, P.C.  
500 N. Akard St., Suite 2150  
Dallas, TX 75201

17 I declare under penalty of perjury that the foregoing is true and correct.

18 DATED: May 18, 2020.

19  
20 By /s/ Adam Hosmer-Henner  
21 An Employee of McDonald Carano  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**INDEX OF EXHIBITS**

EXHIBIT #	DESCRIPTION	NUMBER OF PAGES
1	Proposed Order Awarding Costs	2

# EXHIBIT 1

FILED  
Electronically  
PR17-00445  
2020-05-18 09:59:57 PM  
Jacqueline Bryant  
Clerk of the Court  
Transaction # 7882654

# EXHIBIT 1

1  
2  
3  
4  
5 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
6 **IN AND FOR THE COUNTY OF WASHOE**

7 \* \* \* \* \*

8 In the Matter of the Administration of the  
9 SSJ ISSUE TRUST,

**CASE NO.: PR17-00445**

**DEPT. NO.: 15**

10 **CONSOLIDATED**

11 In the Matter of the Administration of the  
12 SAMUEL S. JAKSICK, JR. FAMILY TRUST,

**CASE NO.: PR17-00446**

**DEPT. NO.: 15**

13  
14 **ORDER AWARDING COSTS**

15 The Court, having considered Stanley Jaksick's Verified Memorandum of Costs that  
16 was filed on March 17, 2020, finds that Stanley Jaksick has appropriately submitted  
17 documentation for claimed costs in the amount of \$43,044.96. No objection or motion to re-  
18 tax was filed or submitted by any party and service and notice by Stanley Jaksick was  
19 proper. Accordingly, the Court after careful review of each and every reasonable and  
20 necessary cost incurred in this action, and for other good cause shown, **ORDERS**  
21 Respondent and Counter-Petition Wendy Jaksick to pay Stanley Jaksick costs in the amount  
22 of \$43,044.96. **IT IS FURTHER ORDERED** that unpaid costs will accrue interest subject to  
23 the statutory interest rate in Nevada.

24 **IT IS SO ORDERED.**

25 DATED: This \_\_\_\_ day of \_\_\_\_\_, 2020.

26  
27 \_\_\_\_\_  
28 **DISTRICT JUDGE**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully submitted by:

McDONALD CARANO

By /s/ Adam Hosmer-Henner  
Adam Hosmer-Henner, Esq. (NSBN 12779)  
100 West. Liberty Street, 10th Floor  
Reno, Nevada 89501  
*Attorneys for Stanley Jaksick,*  
*Co-Trustee of the Family Trust*

**Jayne Ferretto**

---

**From:** eflex@washoecourts.us  
**Sent:** Monday, May 18, 2020 10:03 PM  
**To:** Kent Robison  
**Cc:** Jayne Ferretto  
**Subject:** NEF: CONS: TRUST: SSJ'S ISSUE TRUST: Request for Submission: 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:** 05-18-2020:21:59:57  
**Clerk Accepted:** 05-18-2020:22:02:27  
**Court:** Second Judicial District Court - State of Nevada  
Civil  
**Case Title:** CONS: TRUST: SSJ'S ISSUE TRUST  
**Document(s) Submitted:** Request for Submission  
- \*\*Continuation  
**Filed By:** Adam Hosmer-Henner

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:**

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

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

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

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



1 CODE: 3795  
2 DONALD A. LATTIN, ESQ.  
3 Nevada Bar No. 693  
4 CAROLYN K. RENNER, ESQ.  
5 Nevada Bar No. 9164  
6 KRISTEN D. MATTEONI, ESQ.  
7 Nevada Bar No. 14581  
8 MAUPIN, COX & LeGOY  
9 4785 Caughlin Parkway  
10 Reno, Nevada 89519  
11 Telephone: (775) 827-2000  
12 Facsimile: (775) 827-2185  
13 *Attorneys for Petitioners/Co-Trustees*  
14

15 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
16  
17 IN AND FOR THE COUNTY OF WASHOE  
18

19 In the Matter of the: Case No.: PR17-0445  
20 Ssj's ISSUE TRUST. Dept. No.: 15  
21 \_\_\_\_\_/ Consolidated  
22

23 In the Matter of the Administration of Case No.: PR17-0446  
24 THE SAMUEL S. JAKSICK, JR., FAMILY TRUST. Dept. No.: 15  
25 \_\_\_\_\_/  
26

**REPLY IN SUPPORT OF MOTION TO ALTER OR AMEND THE JUDGMENT**

27 TODD JAKSICK, as sole Trustee of the SSJ's Issue Trust and as Co-Trustee of the Samuel  
28 S. Jaksick, Jr. Family Trust (the "Family Trust"), MICHAEL S. KIMMEL, individually and as  
29 Co-Trustee of the Family Trust and KEVIN RILEY, individually, as former Trustee of the Family  
30 Trust, and Trustee of the Wendy A. Jaksick 2012 BHC Family Trust (hereafter "Petitioners",  
31 "Trustees", or "Co-Trustees"), hereby submit their reply in support of their motion to alter or  
32 amend the judgment filed in this case.

## MEMORANDUM OF POINTS AND AUTHORITIES

1  
2 In her Opposition to Motion to Alter or Amend the Judgment (“Opposition”), Wendy  
3 concedes that the Court is required to conduct an analysis of the *Brunzell* factors as part of any  
4 award for attorney’s fees. *See generally*, Opposition. In order to overcome her failure to provide  
5 the Court with the *Brunzell* analysis, Wendy attempts to justify the award of fees by equating  
6 certain sections of this Court’s Order After Equitable Trial, with the factors in *Brunzell*. In the  
7 end, Wendy accepts the reality of her position, which is that her failure to provide a *Brunzell*  
8 analysis necessarily results in the Court removing Wendy’s award of fees from the judgment. As  
9 a result of her realization, Wendy then tries to salvage her award with a “Supplemental Motion in  
10 Support of Award of Attorney’s Fees to Wendy Jaksick’s Attorneys.” The Co-Trustees have filed  
11 a motion to strike Wendy’s Supplemental Motion contemporaneously with this Reply, as Wendy  
12 provides no authority which allows the Court to consider the *Brunzell* factors subsequent to making  
13 the attorney’s fees award. Accordingly, the judgment should be altered or amended by striking  
14 the award of fees to Wendy.  
15  
16

17 While this Reply will not countenance the filing of Wendy’s Supplemental Motion by  
18 providing any opposition thereto, it is important to note that the exhibits to the Supplemental  
19 Motion bring serious questions as to the reasonableness of Wendy’s fees. First, the firm of Fox,  
20 Rothschild LLP utilized a total of eleven (11) lawyers and staff on this case: two (2) partners, four  
21 (4) associate attorneys, one (1) “counsel”, two (2) paralegals, one (1) “staff”, and one (1) “e-  
22 discovery”. Notably, this is in addition to the lawyers and staff in Texas working on this case, all  
23 on behalf of Wendy. Second, the billing rates of these attorneys and staff are beyond the pale and  
24 well in excess of what is considered reasonable in the Reno legal market. The two (2) partners  
25  
26

1 were billing at a rate of \$640 and \$520 per hour. There is no attorney in Reno billing at \$640 per  
2 hour, and the number of attorneys billing at that rate in Las Vegas, if any, would be few. This rate  
3 is higher than either of the lead attorneys working on behalf of Todd Jaksick, individually, and the  
4 Co-Trustees. The two (2) paralegals billing at a rate of \$295 and \$340 per hour for “preparing and  
5 receiving discovery” is unconscionable. These rates are not only higher than some attorney rates  
6 in Reno, but also higher than some of the associate rates for Fox Rothschild LLP. These rates are  
7 not reasonable paralegal rates by Nevada standards much less Reno standards. Wendy’s *post hoc*  
8 analysis of the *Brunzell* factors thus defines why the law requires such an analysis prior to any  
9 award of fees. The Court did not have the benefit of any of the information contained in Wendy’s  
10 Supplemental Motion prior to making its award, which is what is required under Nevada law.  
11

12 Notwithstanding any of the above, Wendy has provided absolutely no authority for the  
13 Court to award fees absent consideration of the *Brunzell* factors, which Wendy all but admits was  
14 not done in this case. Wendy cannot reach into the Order After Equitable Trial and cherry-pick  
15 statements of the Court to insert into her *post hoc Brunzell* analysis. The analysis was to be  
16 completed prior to making the fees award. It was not. The Court’s Order After Equitable Trial  
17 contains numerous statements which are issues for Wendy regarding her fees, and weigh against  
18 the reasonableness of her fees. First, Wendy cannot use the *Brunzell* analysis provided by the  
19 Court for Todd’s award of fees to support an award of fees in her favor. *See* Opp’n at 7:8-13.  
20 Additionally, Wendy’s comment that the Court “confirms that Wendy’s attorneys were successful  
21 in prevailing in their claim against Todd for breach of fiduciary duties” does not align with (1) the  
22 Fifteen Thousand Dollar (\$15,000) verdict in response to an Eighty Million Dollar (\$80,000,000)  
23 demand for verdict; or (2) that the jury found Wendy had not proven her claims for civil conspiracy  
24  
25  
26

1 and aiding and abetting, aiding and abetting breach of fiduciary duty, or fraud, nor did the jury  
2 find that Wendy proved any of her claims against any of the other defendants. The Court's  
3 description of Wendy's litigation tactics, specifically that she initiated "scorched-earth litigation  
4 grounded in entitlement and limited self-awareness" could be ascribed to either the "qualities,  
5 abilities and skill of Wendy's attorneys," or to the "skill, time and attention Wendy's attorneys  
6 gave the work in preparing for and trying Wendy's claims," neither of which translates into  
7 reasonableness of fees. Opp'n at 7:18-19. With respect to Wendy's claim against Todd for  
8 violation of the no-contest provision of the trusts, the Court found Wendy's claim to be "retaliatory  
9 and made with little legal basis or support from the trust instruments." See Order at 15:13-15.  
10 This too weighs against reasonableness of Wendy's fees.  
11

12 Wendy's attempt to justify an award of fees in her favor must fail because it is clear that  
13 Wendy failed to provide the Court with an analysis of the *Brunzell* factors prior to the Court  
14 awarding her fees. There is no authority which allows the Court to conduct the analysis after the  
15 award has already been made. Accordingly, this Court must find that the judgment should be  
16 altered or amended to remove the award of fees to Wendy.  
17

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26

**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 19th day of May, 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 the Co-Trustees*

**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:

<p>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 <a href="mailto:philip@klmlawfirm.com">philip@klmlawfirm.com</a> <i>Attorneys for Stan Jaksick as Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust</i></p> <p>Mark Connot, Esq. Fox Rothschild LLP 1980 Festival Plaza Drive, #700 Las Vegas, NV 89135 <a href="mailto:MConnot@foxrothschild.com">MConnot@foxrothschild.com</a></p> <p><i>And</i></p> <p>R. Kevin Spencer, Esq. (Pro Hac Vice) Zachary E. Johnson, Esq. (Pro Hac Vice) Spencer &amp; Johnson PLLC 500 N. Akard Street, Suite 2150 Dallas, TX 75201 <a href="mailto:kevin@dallasprobate.com">kevin@dallasprobate.com</a> <a href="mailto:zach@dallasprobate.com">zach@dallasprobate.com</a> <i>Attorneys for Wendy A. Jaksick</i></p>	<p>Kent R. Robison, Esq. Therese M. Shanks, Esq. Robison, Sharpe, Sullivan &amp; Brust 71 Washington Street Reno, Nevada 89503 <a href="mailto:krobison@rssblaw.com">krobison@rssblaw.com</a> <a href="mailto:tshanks@rssblaw.com">tshanks@rssblaw.com</a> <i>Attorneys for Todd B. Jaksick, Individually, and as beneficiary, SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust</i></p> <p>Adam Hosmer-Henner, Esq. Sarah A. Ferguson, Esq. McDonald Carano Wilson LLP 100 W. Liberty Street, 10th Floor Reno, NV 89501 <a href="mailto:ahosmerhenner@mcdonaldcarano.com">ahosmerhenner@mcdonaldcarano.com</a> <a href="mailto:sferguson@mcdonaldcarano.com">sferguson@mcdonaldcarano.com</a> <i>Attorneys for Stan Jaksick, individually, and as beneficiary of the Samuel S. Jaksick, Jr. Family Trust and SSJ's Issue Trust</i></p>
--	--

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:

<p>Alexi Smrt 3713 Wrexham St. Frisco, TX 75034</p>	<p>Luke Jaksick c/o Jim Smrt 6543 Galena Canyon Trail Reno, NV 89511</p>
---	--

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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
---	--

Dated this 19<sup>th</sup> day of May, 2020.

Katie Allen  
EMPLOYEE

1 **3860**

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,*

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

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

15 **IN AND FOR THE COUNTY OF WASHOE**

16 In the Matter of the:

**CASE NO.: PR17-00445**

17 SSJ's ISSUE TRUST.

**DEPT. NO.: 15**

18 In the Matter of the:

**CASE NO.: PR17-00446**

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

**DEPT. NO.: 15**

21 WENDY JAKSICK,  
22 Respondent and Counter-Petitioner,  
23 v.

**REQUEST FOR SUBMISSION OF TODD  
B. JAKSICK'S MOTION TO AMEND  
JUDGMENT**

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, INCLINE  
TSS, LTD.; and DUCK LAKE RANCH, LLC;

Petitioners and Counter-Respondents.



1 It is requested that Todd B. Jaksick's Motion to Amend Judgment, which was filed in the  
2 above-entitled matter on April 29, 2020, be submitted for decision. The undersigned attorney  
3 certifies that a copy of this Request has been served on all counsel of record.

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

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

8 DATED this 19<sup>th</sup> day of May, 2020.

9  
10 ROBISON, SHARP, SULLIVAN & BRUST  
11 A Professional Corporation  
12 71 Washington Street  
13 Reno, Nevada 89503

14 

15 KENT R. ROBISON  
16 THERESE M. SHANKS

17 *Attorneys for Todd B. Jaksick, Individually,*  
18 *Incline TSS, Ltd., and Duck Lake Ranch, LLC*  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 **REQUEST FOR SUBMISSION OF TODD B. JAKSICK'S MOTION TO AMEND JUDGMENT** 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](mailto:dlattin@mcllawfirm.com)

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

[kmatteoni@mcllawfirm.com](mailto:kmatteoni@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

1575 Delucchi Lane, Suite 101

Reno, Nevada 89502

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

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

**Adam Hosmer-Henner, Esq.**

**Sarah A. Ferguson, Esq.**

McDonald Carano

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

P.O. Box 2670

Reno, NV 89505

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

1980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

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

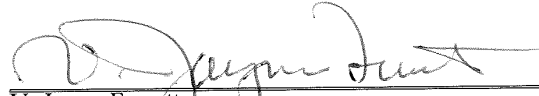
Dallas, Texas 75201

Email: [kevin@dallasprobate.com](mailto:kevin@dallasprobate.com) / [zach@dallasprobate.com](mailto:zach@dallasprobate.com)

*Attorneys for Respondent Wendy A. Jaksick*

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

5 DATED: This 19th day of May, 2020.

6   
7 V. Jayne Ferretto  
8 Employee of Robison, Sharp, Sullivan & Brust

1 CODE: 2475  
2 DONALD A. LATTIN, ESQ.  
3 Nevada Bar No. 693  
4 CAROLYN K. RENNER, ESQ.  
5 Nevada Bar No. 9164  
6 KRISTEN D. MATTEONI, ESQ.  
7 Nevada Bar No. 14581  
8 MAUPIN, COX & LeGOY  
9 4785 Caughlin Parkway  
10 Reno, Nevada 89519  
11 Telephone: (775) 827-2000  
12 Facsimile: (775) 827-2185  
13 *Attorneys for Petitioners/Co-Trustees*

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

12 In the Matter of the: Case No.: PR17-0445  
13 SSI's ISSUE TRUST. Dept. No.: 15  
14 \_\_\_\_\_/ Consolidated

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

18  
19 **MOTION TO STRIKE WENDY'S SUPPLMENTAL MOTION IN SUPPORT OF**  
20 **AWARD OF ATTORNEY'S FEES TO WENDY JAKSICK'S ATTORNEYS**

21 TODD JAKSICK, as sole Trustee of the SSI's Issue Trust and as Co-Trustee of the Samuel  
22 S. Jaksick, Jr. Family Trust (the "Family Trust"), MICHAEL S. KIMMEL, individually and as  
23 Co-Trustee of the Family Trust and KEVIN RILEY, individually, as former Trustee of the Family  
24 Trust, and Trustee of the Wendy A. Jaksick 2012 BHC Family Trust (hereafter "Petitioners",  
25 "Trustees", or "Co-Trustees"), hereby file their Motion to Strike "Wendy's Supplemental Motion  
26

1 in Support of Award of Attorney's Fees to Wendy Jaksick's Attorneys" (hereafter referred to  
2 herein as the "Supplemental Motion").

3 **I.**  
4 **LEGAL STANDARD**

5 NRCP 12(f) provides that "[u]pon motion made by a party before responding to a pleading or,  
6 if no responsive pleading is permitted by these rules, upon motion made by a party within 20 days after  
7 the service of the pleading upon the party or upon the court's own initiative at any time, the court may  
8 order stricken from any pleading any insufficient defense or any redundant, immaterial, impertinent,  
9 or scandalous matter." The district court has "inherent power over the administration of its  
10 business. It has inherent authority to regulate the conduct of attorneys who appear before it [and]  
11 to promulgate and enforce rules for the management of litigation. . . ." *Spurlock v. F.B.I.*, 69 F.3d  
12 1010, 1016 (9th Cir. 1995) (citations omitted). Here, Petitioners request that this Court exercise  
13 its authority to enforce rules for the management of litigation by striking the Supplemental Motion  
14 filed by Wendy, which is procedurally flawed and filed without a legal basis.

15 **II.**  
16 **ARGUMENT**

17 On April 28, 2020, the Co-Trustees filed their Motion to Alter or Amend the Judgment to  
18 remove the award of attorney's fees to Wendy's attorneys. The basis for the Motion to Alter or  
19 Amend was that Wendy had failed to provide the Court with her analysis of the *Brunzell* factors  
20 for the Court's consideration prior to deciding on the award of fees. In her Opposition filed on  
21 May 12, 2020, Wendy all but admits that she failed to analyze the *Brunzell* factors for the Court.  
22 In an attempt to salvage her position, she tries to argue that the Court provided its analysis within  
23 the Order After Equitable Trial. The problem is that the Court already ruled without considering  
24 the appropriate factors. The flaw in this reasoning is addressed in the Reply in Support of Motion  
25 to Alter or Amend filed contemporaneously herewith. Evidence of the flaw in Wendy's reasoning  
26

1 is that she attempts *post hoc* to present this Court with the analysis of the *Brunzell* factors that she  
2 should have provided with her request for attorney's fees. She does so with this unauthorized  
3 Supplemental Motion.

4 Wendy failed to provide the Court with an analysis of the *Brunzell* factors prior to the Court  
5 awarding her fees. There is no authority which allows the Court to conduct the analysis after the  
6 award has already been made. There is no authority to support Wendy's Supplemental Motion.

7 The Co-Trustees therefore respectfully request that, pursuant to NRCF 12(f) and the inherent  
8 powers of this Court, that the Court grant their Motion to Strike Wendy's Supplemental Motion.  
9

10 **NRS 239B.030 Affirmation**

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

13 Dated this 19th day of May, 2020.

14 MAUPIN, COX & LEGOY

15  
16  
17 By: 

Donald A. Lattin, NSB # 693

Carolyn K. Renner, Esq., NSB #9164

Kristen D. Matteoni, Esq. NSB #14581

4785 Caughlin Parkway

Reno, NV 89519

Attorneys for the Co-Trustees

**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:

<p>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 <a href="mailto:philip@klmlawfirm.com">philip@klmlawfirm.com</a> <i>Attorneys for Stan Jaksick as Co-Trustee of the Samuel S. Jaksick, Jr. Family Trust</i></p> <p>Mark Connot, Esq. Fox Rothschild LLP 1980 Festival Plaza Drive, #700 Las Vegas, NV 89135 <a href="mailto:MConnot@foxrothschild.com">MConnot@foxrothschild.com</a></p> <p><i>And</i></p> <p>R. Kevin Spencer, Esq. (Pro Hac Vice) Zachary E. Johnson, Esq. (Pro Hac Vice) Spencer &amp; Johnson PLLC 500 N. Akard Street, Suite 2150 Dallas, TX 75201 <a href="mailto:kevin@dallasprobate.com">kevin@dallasprobate.com</a> <a href="mailto:zach@dallasprobate.com">zach@dallasprobate.com</a> <i>Attorneys for Wendy A. Jaksick</i></p>	<p>Kent R. Robison, Esq. Therese M. Shanks, Esq. Robison, Sharpe, Sullivan &amp; Brust 71 Washington Street Reno, Nevada 89503 <a href="mailto:krobison@rssblaw.com">krobison@rssblaw.com</a> <a href="mailto:tshanks@rssblaw.com">tshanks@rssblaw.com</a> <i>Attorneys for Todd B. Jaksick, Individually, and as beneficiary, SSJ's Issue Trust and Samuel S. Jaksick, Jr., Family Trust</i></p> <p>Adam Hosmer-Henner, Esq. Sarah A. Ferguson, Esq. McDonald Carano Wilson LLP 100 W. Liberty Street, 10th Floor Reno, NV 89501 <a href="mailto:ahosmerhenner@mcdonaldcarano.com">ahosmerhenner@mcdonaldcarano.com</a> <a href="mailto:sferguson@mcdonaldcarano.com">sferguson@mcdonaldcarano.com</a> <i>Attorneys for Stan Jaksick, individually, and as beneficiary of the Samuel S. Jaksick, Jr. Family Trust and SSJ's Issue Trust</i></p>
--	--

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:

<p>Alexi Smrt 3713 Wrexham St. Frisco, TX 75034</p>	<p>Luke Jaksick c/o Jim Smrt 6543 Galena Canyon Trail Reno, NV 89511</p>
---	--

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

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

Dated this 19<sup>th</sup> day of May, 2020.

Katie Allen  
EMPLOYEE