
In the Supreme Court of Nevada

TRUDI LEE LYTLE; and JOHN ALLEN LYTLE, as
trustees of THE LYTLE TRUST,

Appellants,

vs.

SEPTEMBER TRUST, DATED MARCH 23, 1972;
GERRY R. ZOBRIST AND JOLIN G. ZOBRIST, as
trustees of the GERRY R. ZOBRIST AND JOLIN
G. ZOBRIST FAMILY TRUST; RAYNALDO G.
SANDOVAL AND JULIE MARIE SANDOVAL
GEGEN, as Trustees of the RAYNALDO G. AND
EVELYN A. SANDOVAL JOINT LIVING AND
DEVOLUTION TRUST DATED MAY 27, 1992;
DENNIS A. GEGEN AND JULIE S. GEGEN,
Husband and wife, as joint tenants,

Respondents.

Electronically Filed
May 04 2022 10:16 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

from the Eighth Judicial District Court, Clark County
The Honorable TIMOTHY C. WILLIAMS, District Judge
District Court Case Nos. A-16-747800-C and A-17-765372-C

APPELLANTS' APPENDIX

VOLUME 2

PAGES 251-500

JOEL D. HENRIOD (SBN 8492)
DANIEL F. POLSENBERG (SBN 2376)
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(702) 949-8200

Attorneys for Appellants

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1	Second Amended Complaint	07/25/17	1	1–9
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3	Plaintiffs’ Answer to Counter Complaint	09/05/17	1	26–31
4	Notice of Entry of Order Granting Motion to Consolidate Case No. A-16-747800-C with Case No. A-17-765372-C	03/05/18	1	32–40
5	Notice of Entry of Order Granting Motion for Summary Judgment or, in the Alternative, Motion for Judgment on the Pleadings and Denying Countermotion for Summary Judgment	05/25/18	1	41–57
6	Notice of Entry of Order Regarding Plaintiffs’ Motion for Attorney’s Fees and Costs and Memorandum of Costs and Disbursements and Defendants’ Motion to Retax and Settle Memorandum of Costs	09/13/18	1	58–69
7	Notice of Entry of Order Granting Plaintiffs’ Motion for Order to Show Cause Why the Lytle Trust Should Not be Held in Contempt for Violation of Court Orders	05/22/20	1	70–86
8	Plaintiffs’ Motion for Attorney’s Fees and Costs	05/26/20	1 2	87–250 251–293
9	Declaration of Counsel in Support of Plaintiffs’ Motion for Attorney’s Fees and Costs	05/26/20	2	294–300
10	Memorandum of Costs and Disbursements	05/26/20	2	301–303

11	Defendant Lytle Trust's Opposition to Plaintiffs' Motion for Attorney Fees and Costs	06/09/20	2	304–475
12	Robert Z. Disman and Yvonne A. Disman's Motion for Attorney's Fees	06/11/20	2	476–494
13	Appendix of Exhibits for Robert Z. Disman and Yvonne A. Disman's Motion for Attorney's Fees	06/11/20	2 3	495–500 501–711
14	Reply to Defendant Lytle Trust's Opposition to Plaintiffs' Motion for Attorney's Fees and Costs	06/29/20	3 4 5 6	712–750 751–1000 1001–1250 1251–1275
15	Notice of Withdrawal of Robert Z. Disman and Yvonne A. Disman's Motion for Attorney's Fees	07/06/20	6	1276–1278
16	Transcript of Proceedings	07/07/20	6	1279–1326
17	Notice of Entry of Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs	08/11/20	6	1327–1337
18	Notice of Appeal	08/21/20	6	1338–1352
19	Case Appeal Statement	08/21/20	6	1353–1357
20	Plaintiffs' Motion to Amend Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(B)	09/08/20	6	1358–1367
21	Defendant Lytle Trust's Opposition to Plaintiffs' Motion to Amend Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(B)	09/22/20	6	1368–1384
22	Defendant Lytle Trust's Supplement to Opposition to Plaintiffs' Motion to Amend Order Granting in Part and Denying in	09/28/20	6	1385–1399

	Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(B)			
23	Plaintiffs' Reply in Support of Their Motion to Amend Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(B)	10/06/20	6	1400–1408
24	Notice of Entry of Order Certifying to the Supreme Court Pursuant to NRAP 12(a) and NRCP 62.1 that the District Court Would Grant Plaintiffs' Motion to Amend Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(b)	01/15/21	6	1409–1416
25	Notice of Order of Limited Remand	04/15/21	6	1417–1421
26	Defendant Lytle Trust's Report for April 29, 2021 Hearing, and Proposed Order	04/27/21	6	1422–1453
27	Plaintiffs' Status Report for Hearing on Further Proceedings Re: Supreme Court Order of Limited Remand	04/28/21	6	1454–1480
28	Notice of Entry of Order Granting Plaintiffs' Motion to Amend Order Granting in Part and Denying in Part Plaintiffs' Motion for Attorney's Fees and Costs Pursuant to NRCP 52(B)	05/04/21	6	1481–1495
29	Amended Notice of Appeal	06/03/21	6 7	1496–1500 1501–1526
30	Amended Case Appeal Statement	06/03/21	7	1527–1531

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29	Amended Notice of Appeal	06/03/21	6 7	1496–1500 1501–1526
13	Appendix of Exhibits for Robert Z. Disman and Yvonne A. Disman’s Motion for Attorney’s Fees	06/11/20	2 3	495–500 501–711
19	Case Appeal Statement	08/21/20	6	1353–1357
9	Declaration of Counsel in Support of Plaintiffs’ Motion for Attorney’s Fees and Costs	05/26/20	2	294–300
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21	Defendant Lytle Trust’s Opposition to Plaintiffs’ Motion to Amend Order Granting in Part and Denying in Part Plaintiffs’ Motion for Attorney’s Fees and Costs Pursuant to NRCP 52(B)	09/22/20	6	1368–1384
26	Defendant Lytle Trust’s Report for April 29, 2021 Hearing, and Proposed Order	04/27/21	6	1422–1453
22	Defendant Lytle Trust’s Supplement to Opposition to Plaintiffs’ Motion to Amend Order Granting in Part and Denying in Part Plaintiffs’ Motion for Attorney’s Fees and Costs Pursuant to NRCP 52(B)	09/28/20	6	1385–1399
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6	Notice of Entry of Order Regarding Plaintiffs’ Motion for Attorney’s Fees and Costs and Memorandum of Costs and Disbursements and Defendants’ Motion to Retax and Settle Memorandum of Costs	09/13/18	1	58–69
25	Notice of Order of Limited Remand	04/15/21	6	1417–1421

15	Notice of Withdrawal of Robert Z. Disman and Yvonne A. Disman's Motion for Attorney's Fees	07/06/20	6	1276–1278
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1	Second Amended Complaint	07/25/17	1	1–9
16	Transcript of Proceedings	07/07/20	6	1279–1326

CERTIFICATE OF SERVICE

I certify that on May 4, 2022, I submitted the foregoing
“Appellants’ Appendix” for filing *via* the Court’s eFlex electronic
filing system. Electronic notification will be sent to the following:

Kevin B. Christensen
Wesley J. Smith
CHRISTENSEN JAMES & MARTIN
7740 W. Sahara Avenue
Las Vegas, Nevada 89117

*Attorneys for Respondents September
Trust, dated March 23, 1972, Gerry R.
Zobrist and Jolin G. Zobrist, as
trustees of the Gerry R. Zobrist and
Jolin G. Zobrist Family Trust,
Raynaldo G. Sandoval and Julie
Marie Sandoval Gegen, as trustees of
the Raynaldo G. and Evelyn A.
Sandoval Joint Living and Devolution
Trust dated May 27, 1992, and Dennis
A. Gegen and Julie S. Gegen, husband
and wife, as joint tenants*

/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber Christie LLP

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020	- LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
	- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020	- WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
	- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
	- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020	- WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020	- WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020	- LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020	- WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020	- WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
	- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

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3/24/2020	- WJS	Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS	Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW	Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS	Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW	Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS	Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS	Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS	Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

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4/10/2020	- WJS	Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff	0.28 260.00/hr	71.50
	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date	1.48 260.00/hr	383.50
4/11/2020	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.38 260.00/hr	97.50
4/13/2020	- WJS	Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley	2.38 260.00/hr	617.50
	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall	1.75 260.00/hr	455.00
4/14/2020	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk	1.85 260.00/hr	481.00
	- WJS	Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff	1.25 260.00/hr	325.00
4/15/2020	- WJS	E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff	1.20 260.00/hr	312.00
	- LJW	Review filings and emails; email to W Smith	0.05 260.00/hr	13.00
4/16/2020	- DEM	Research recent Nevada HOA Caselaw; email to W Smith	0.25 260.00/hr	65.00
4/17/2020	- WJS	E-mail from D Martin and review new Supreme Court Opinion	0.10 260.00/hr	26.00
4/20/2020	- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond	0.30 260.00/hr	78.00

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4/20/2020	- WJS	Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020	- WJS	Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
	- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020	- KBC	Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
	- WJS	Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
	- LJW	Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020	- LJW	Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
	- WJS	Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020	- WJS	Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
	- LJW	Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020	- WJS	E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020	- LJW	Review emails and revised Order	0.05 260.00/hr	13.00

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4/30/2020	- LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
		For professional services rendered	144.28	\$37,350.80
		Additional Charges :		
			<u>Qty/Price</u>	
5/24/2018	- N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018	- LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018	- N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018	- N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018	- N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018	- N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018	- N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018	- N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018	- N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018	- N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018	- N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018	- N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018	- N	Clark County District Court Download Fee	0.25 2.00	0.50

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8/31/2018 - N	WestLaw Research 8/1-8/31/18		0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)		0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs		0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18		0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay		0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18		0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider		0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18		0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider		0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)		0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)		0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019		0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal		0.25 443.54	110.89
6/30/2019 - N	WestLaw Research		0.25 301.54	75.39
8/31/2019 - N	WestLaw Research		0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020		0.25 31.81	7.95

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2/4/2020	- N	Clark County District Court Document Download - Order on Receivership	0.25 5.50	1.38
2/5/2020	- N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver	0.25 101.97	25.49
2/11/2020	- N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses	0.25 19.00	4.75
2/29/2020	- N	WestLaw Research - February 2020	0.25 528.58	132.15
3/4/2020	- N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders	0.25 3.50	0.88
	- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure	0.25 356.79	89.20
3/11/2020	- N	Court Parking Expense at Hearing	0.25 6.00	1.50
3/26/2020	- N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order	0.25 3.50	0.88
3/31/2020	- N	WestLaw Research (March 2020)	0.25 683.39	170.85
4/10/2020	- N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)	0.25 3.50	0.88
4/13/2020	- N	District Court Filing Fee - Notice to Appear (A-18-775843-C)	0.25 3.50	0.88
4/14/2020	- N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)	0.25 3.50	0.88
	- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)	0.25 3.50	0.88
	- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)	0.25 3.50	0.88
4/15/2020	- N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)	0.25 51.00	12.75
4/30/2020	- N	WestLaw Research April 2020	0.25 250.87	62.72

Raynaldo G. Evelyn A. Sandoval Jt Living & Devolution Trust

		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	<u>144.28</u>	\$38,387.07

Exhibit 6d

000259

Exhibit 6d

STATEMENT

Christensen James & Martin

7440 W. Sahara Ave.
Las Vegas, NV 89117
702/255-1718
702/255-0871 Fax
Carma@CJMLV.com

000260

History of Billing

Julie Marie Sandoval Gegen
1831 Rosemere Ct.
Las Vegas, NV 89117

Professional Services

			Hrs/Rate	Amount
5/23/2018	- LJW	Preparation of Memorandum of Costs	0.43 260.00/hr	110.50
5/24/2018	- LJW	Conference with W Smith regarding Fees and Costs; review Bills to redact Privileged Information; conference with Clerk	0.48 260.00/hr	123.50
	- WJS	Email from L Wolff regarding Motion for Fees; review signed Order; conference with Clerk regarding filing Order; preparation of Notice of Entry of Order; review draft Notice of Entry; conference with L Wolff regarding Motion for Fees, review Billing Statements	0.25 260.00/hr	65.00
5/28/2018	- LJW	E-mails to and from Clerk regarding Notice	0.03 260.00/hr	6.50
5/29/2018	- LJW	Preparation of Motion for Fees; preparation of Declaration for Fees; preparation of Exhibits	0.63 260.00/hr	162.50
5/30/2018	- LJW	Preparation of Declaration for Fees; preparation of Exhibits for Motion; review Billings for Privilege; telephone call to Clerk regarding Redaction of Privileged Information; preparation of Spreadsheet calculating Fees and Costs	0.58 260.00/hr	149.50
5/31/2018	- DEM	Preparation of documents for Disclosure in Motion for Fees; conference with W Smith	0.13 260.00/hr	32.50
	- LJW	Preparation of Declaration for Fees; preparation of Exhibits for Motion; preparation of Spreadsheet calculating Fees and Costs	0.38 260.00/hr	97.50
	- WJS	Review redacted Fee Statements; prepare for filing; review and redline draft Motion for Fees, associated Research and Citation Check; review and redline Declaration in Support of Fees Motion	1.38 260.00/hr	357.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2018	- WJS	Revise Motion, Declaration and Memo of Costs; conference with Clerk regarding Fee Statements; email to L Wolff; review Rules regarding Timing	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith regarding Motion for Attorney's Fees and Costs; telephone call with Clerk regarding redaction of Bills; review revisions to Motion	0.13 260.00/hr	32.50
6/4/2018	- WJS	Emails to and from L Wolff; revise Fees Motion and related Documents	0.20 260.00/hr	52.00
	- LJW	Review and revise Memorandum of Costs, Declaration of W. Smith, Motion for Attorney's Fees and Costs, Exhibits and update Summary of Fees and Costs; telephone call to Clerk regarding redaction and filing updated Billing Summary	0.55 260.00/hr	143.00
6/5/2018	- WJS	Review Notices from Court; review filings; calendar Hearing Date; email to L Wolff regarding Notice of Hearing	0.08 260.00/hr	19.50
6/6/2018	- LJW	Preparation of Notice of Hearing; emails to and from W Smith regarding Notice; emails to and from Clerk regarding Notice; review filed Pleadings	0.15 260.00/hr	39.00
6/11/2018	- LJW	Review Motion to Retax Costs; email to W Smith regarding Motion; email to Clerk regarding Receipts; Research Evidence of Costs	0.43 260.00/hr	110.50
6/12/2018	- LJW	Research Memorandum and Evidence of Costs; telephone call to Clerk regarding Receipts and Spreadsheet; preparation of Opposition to Motion to Retax Costs	0.48 260.00/hr	123.50
6/13/2018	- WJS	Email from R Haskin; emails to and from L Wolff; review NRAP; emails to and from R Haskin regarding Request for Stipulation on Appeal Reply	0.20 260.00/hr	52.00
	- LJW	Preparation of Opposition to Motion to Retax Costs; emails to and from W Smith regarding request to file Reply; Research Issues related to Replies to Amicus Brief; telephone call with Clerk regarding Costs	0.58 260.00/hr	149.50
6/14/2018	- LJW	Research Costs Awarded by District Courts and preparation of Opposition to Motion to Retax Costs	0.33 260.00/hr	84.50
6/15/2018	- WJS	Emails to and from L Wolff; review and revise Opposition to Motion to Retax Costs and Support Declarations; telephone call from L Wolff; conference with K Christensen	0.38 260.00/hr	97.50
	- LJW	Preparation of Opposition to Motion to Retax Costs; revisions to Motion; preparation of Declaration for Opposition; preparation of Exhibits for Opposition; emails to and from W Smith; emails to and from Clerk	0.95 260.00/hr	247.00
6/19/2018	- WJS	Review Notices from Court; review Notice of Appeal and Appeal Statement filed by Lytles; review Property Records regarding Recorded Releases; review NRAP regarding timing and Appeal; review Notice from Supreme Court; review Motion for Leave to File	0.35 260.00/hr	91.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Response to Amicus Brief; email to D Foley and C Wang regarding Motion and Appeal Issues		
6/19/2018	- KBC	Conference with W Smith regarding Appeal Notice and Fees Motion; calendar Brief Due Dates	0.05 260.00/hr	13.00
6/20/2018	- WJS	E-mails to and from D Foley; draft Opposition to Motion for Leave to Respond to Amicus Brief; email to D Foley	0.55 260.00/hr	143.00
	- LJW	Review Motion to File Amicus Brief; emails to and from W Smith regarding Amicus	0.10 260.00/hr	26.00
6/22/2018	- LJW	Review Releases	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court; review Opposition to Motion for Fees; email to L Wolff regarding Reply; review Notice from Supreme Court; review Response to Motion to Respond to Amicus Brief (filed by Foley)	0.10 260.00/hr	26.00
6/25/2018	- LJW	Review Pleadings; emails to and from W Smith regarding Motion	0.05 260.00/hr	13.00
6/26/2018	- KBC	Conference with W Smith regarding Fees Motion, Appeal Brief, Consolidation and Client conference for Instructions	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court regarding Docketing of Notice of Appeal; review Record Transmitted by District Court; conference with K Christensen; email to Clients	0.23 260.00/hr	58.50
6/27/2018	- LJW	Review Opposition; preparation of Reply to Opposition	0.18 260.00/hr	45.50
6/28/2018	- LJW	Research Arbitration Requirement and CC&Rs; preparation of Reply to Opposition	0.73 260.00/hr	188.50
	- WJS	Review Notice from District Court; review Disman's Motion for Summary Judgment; emails to and from L Wolff	0.08 260.00/hr	19.50
6/29/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees	0.38 260.00/hr	97.50
7/2/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; Research NRS 38.310	1.18 260.00/hr	305.50
	- KBC	Review Disman's Motion for Summary Judgment; conference with Clerk; calendar Hearing	0.10 260.00/hr	26.00
7/3/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply	0.85 260.00/hr	221.00
7/5/2018	- WJS	Email from and telephone calls to and from L Wolff regarding Arguments for Reply Brief; review and revise Reply on Motion for Fees and Costs; Research; emails to and from L Wolff	0.45 260.00/hr	117.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2018 -	LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply; telephone call to W Smith; email to Clerk regarding filing; Research Liens and Possessor Interests; Research Lytles Defenses regarding recording Liens	0.83 260.00/hr	214.50
7/6/2018 -	LJW	Review Order; calendar Hearing Date	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Rescheduled Hearing; emails to and from R Haskin and C Wang regarding Hearing Date	0.05 260.00/hr	13.00
7/20/2018 -	LJW	E-mails to and from W Smith regarding Transcript; Research on Appellate Rules and Transcripts; email to opposing counsel	0.38 260.00/hr	97.50
7/23/2018 -	WJS	Review Notice from Supreme Court; review Order Denying Motion to Respond to Amicus Brief	0.08 260.00/hr	19.50
7/24/2018 -	WJS	E-mail from Counsel for Lytle; review Hearing Transcripts	0.10 260.00/hr	26.00
7/25/2018 -	WJS	Review Motions, Oppositions, Replies and Exhibits related to Fees and Costs; prepare for Hearing on Motion	0.45 260.00/hr	117.00
7/26/2018 -	WJS	Prepare for, attend and present Oral Argument at Hearing on Motion for Attorney's Fees and Costs; conference with C Wang regarding Disman Motion for Summary Judgment; review Docket and Opposition; conference with E James regarding Hearing; telephone call from C Wang	1.03 260.00/hr	266.50
7/27/2018 -	KBC	Review Hearing Notice; calendar Hearing on Motion for Summary Judgment; conference with W Smith	0.03 260.00/hr	6.50
7/30/2018 -	LJW	Review Case Statement; emails to and from opposing counsel; emails to W Smith; review Orders and Motions	0.15 260.00/hr	39.00
8/2/2018 -	LJW	Review and download Pleadings filed by Dismans and Lytles	0.13 260.00/hr	32.50
8/6/2018 -	LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	Review Court Notices and Reply Brief from Dismans; emails to and from L Wolf regarding Hearing	0.23 260.00/hr	58.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2018	- WJS	E-mails to and from L Wolff and D Foley regarding Boulden & Lamothe Fee Motion; review Transcripts; preparation for Hearing	0.33 260.00/hr	84.50
	- LJW	Review Court Record regarding Attorney's Fees Motion; Research ruling in Boulden/Lamothe Case; emails to and from W Smith; Research Special Damages Cases	0.40 260.00/hr	104.00
8/8/2018	- LJW	Review emails from Counsel for Boulden; emails to and from W Smith	0.03 260.00/hr	6.50
8/9/2018	- WJS	Preparation for Hearing; attend Hearing on Fees and Costs Motion and Dismans Motion for Summary Judgment; file notes regarding Court Decision; conference with D Foley and C Wang at Courthouse regarding outcome of Hearing, Appeal Issues and strategy; conference with K Christensen regarding Court Order; Research Supersedeas Bonds; email to L Wolff regarding Summary of Court Decision and draft Order; telephone call from L Wolff regarding draft Order	0.80 260.00/hr	208.00
	- KBC	Conference with W Smith; review Order, Entry and Recording Procedures	0.05 260.00/hr	13.00
	- LJW	Telephone call to W Smith regarding Hearing and Case; preparation of Order	0.08 260.00/hr	19.50
8/10/2018	- LJW	Preparation of proposed Order	0.18 260.00/hr	45.50
8/13/2018	- LJW	Preparation of proposed Order; texts to and from W Smith	0.50 260.00/hr	130.00
8/14/2018	- LJW	Preparation of proposed Order; review Motion; Research applicable NRS Statutes; email to W Smith	0.58 260.00/hr	149.50
8/15/2018	- LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	E-mails from and to R Haskin; review and revise draft Order on Fees and Costs	0.35 260.00/hr	91.00
8/16/2018	- WJS	Emails to and from R Haskin regarding draft Fee Order	0.03 260.00/hr	6.50
8/20/2018	- WJS	Email from R Haskin; review and analyze redlines to draft Order; redline revisions to draft Order; emails to and from R Haskin; prepare draft Order; email to all Counsel	0.23 260.00/hr	58.50
8/21/2018	- DEM	Conference with W Smith	0.08 260.00/hr	19.50
	- WJS	E-mails to and from R Haskin and D Foley	0.03 260.00/hr	6.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018	- LJW	Review and download Order; review Rules regarding Appeal Statement; email to W Smith	0.08 260.00/hr	19.50
9/12/2018	- WJS	Review Order; conference with Clerk regarding filing	0.03 260.00/hr	6.50
9/13/2018	- WJS	Review Order; conference with Clerk; review draft Notice of Entry of Order; review Notices from Court regarding filing Order and Notice of Entry; review Notice from NV Supreme Court regarding Submission of Boulden/Lamothe Appeal for Decision without Oral Argument; conference with K Christensen	0.08 260.00/hr	19.50
9/14/2018	- LJW	Review Notice of Appeal and Order regarding Hearing; emails to and from W Smith	0.10 260.00/hr	26.00
9/18/2018	- WJS	Review Amended Docketing Statement of Appeal	0.05 260.00/hr	13.00
	- LJW	Review Pleading Statement	0.10 260.00/hr	26.00
9/21/2018	- WJS	Review Notices from Supreme Court regarding Attorney's Fees Appeal; review Notice from District Court regarding Order Denying Disman Motion for Summary Judgment; telephone call from C Wang	0.15 260.00/hr	39.00
9/24/2018	- KBC	Conference with Attorney; review Research; telephone call to Client regarding Fees Order Recordation	0.08 260.00/hr	19.50
	- LJW	Review and download Case Appeal and other Pleadings	0.08 260.00/hr	19.50
	- WJS	Email from R Haskin; Research Judgment, Appeal, Stay and Supersedeas Bond Statutes and Caselaw; emails to and from and conference with K Christensen; review Judgment Lien and Recording Procedures; draft Affidavit for Recording Judgment; conference with Clerk regarding Certified Judgment; review Certified Judgment and prepare for Recording	0.65 260.00/hr	169.00
10/1/2018	- WJS	Research and draft Response to Motion to Stay and Post Supersedeas Bond; prepare for filing; review Notice from Court; review Appeal Statement	0.50 260.00/hr	130.00
	- LJW	Review Pleadings and Orders filed	0.03 260.00/hr	6.50
	- ELJ	Review Opposition to Motion to Stay Judgment and Deposit Bond	0.05 260.00/hr	13.00
10/2/2018	- WJS	Review Notices from Court; emails to and from L Wolff regarding Appeal Deadlines; email from C Wang; review draft Order Denying Disman's Motion for Summary Judgment; email to C Wang with Comments	0.30 260.00/hr	78.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2018	- WJS	Telephone call from C Wang regarding draft Order on Disman Motion for Summary Judgment; Research Case impact; telephone call and email from Haskin's Office; review Stipulation to Continue Hearing on Stay and Bond; emails to and from Court; review Filings	0.15 260.00/hr	39.00
	- LJW	Review all Appellate Proceedings; Research and calendar Due Dates for Briefing Schedules; emails to and from W Smith	0.25 260.00/hr	65.00
10/4/2018	- KBC	Review Order regarding Settlement Program Exemption; calendar Appeal Brief Due Date; conference with W Smith	0.05 260.00/hr	13.00
10/8/2018	- KBC	Conference with W Smith regarding Appeal Consolidation Issues	0.05 260.00/hr	13.00
	- LJW	E-mails to and from W Smith; review filed Pleadings	0.08 260.00/hr	19.50
	- WJS	Draft email to Clients regarding update on Case; emails to and from L Wolff regarding Appeal Issues and potential Consolidation or Stay of later Appeals; conference with K Christensen	0.25 260.00/hr	65.00
10/9/2018	- LJW	E-mails to and from W Smith; review Pleadings	0.03 260.00/hr	6.50
	- WJS	Revise and send email to Clients regarding Case update and Recommendation on Appeals	0.05 260.00/hr	13.00
	- KBC	Review Appeal Options and email	0.05 260.00/hr	13.00
10/17/2018	- WJS	Review Notices from Supreme Court; review Motions to Consolidate Cases from Haskin; emails to and from Haskin to clarify Motion to Consolidate Request and Briefing; review Docketing Statement for Case	0.20 260.00/hr	52.00
10/18/2018	- WJS	Emails to and from R Haskin regarding Motion to Consolidate; emails to and from and telephone call from D Foley regarding Opposition to Motion to Consolidate	0.08 260.00/hr	19.50
	- LJW	Review Docketing Statement and Motion to Consolidate; emails to and from W Smith	0.10 260.00/hr	26.00
10/19/2018	- WJS	Review Notice from Court; review Opposition to Motion to Consolidate filed by D Foley	0.08 260.00/hr	19.50
10/23/2018	- WJS	Preparation for Hearing; Appearance at Hearing; present Argument in Opposition to Motion to Stay Case pending Appeal; Research; review Nevada State Court Case regarding Fees and Costs Awards; telephone call from Counsel for Disman; conferences with L Wolff and K Christensen; Research regarding Advisory Opinions and Legal Advice from a Judge; review draft Opposition to Motion to Consolidate; review Notices from Court; review Joinder filed by Disman	0.85 260.00/hr	221.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2018	- KBC	Conference with W Smith regarding Hearing, Order and conference with opposing counsel	0.05 260.00/hr	13.00
	- LJW	Review Opposition to Motion to Consolidate Cases; preparation of Responses to Motion to Consolidate Cases; telephone call to W Smith regarding Hearing; Research Attorney's Fees	0.50 260.00/hr	130.00
10/24/2018	- WJS	Review Notices from Supreme Court; review Lytles' Reply Brief in Support of Consolidating Cases	0.05 260.00/hr	13.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
10/29/2018	- WJS	Emails to and from R Haskin regarding Extension of Briefing Dates and Joint Motion to Consolidate Cases; review draft Stipulations; review Notice from Supreme Court regarding Filings	0.10 260.00/hr	26.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
11/1/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Consolidate with Boulden Appeal	0.05 260.00/hr	13.00
11/5/2018	- LJW	Review Court Order	0.03 260.00/hr	6.50
11/7/2018	- WJS	Email from Counsel for Dismar; review letter to Court from Counsel for Dismar regarding proposed Summary Judgment Orders; telephone call from Counsel for Dismar	0.10 260.00/hr	26.00
11/15/2018	- LJW	Review Court Order regarding Jurisdiction	0.03 260.00/hr	6.50
11/16/2018	- DEM	Conference with W Smith; revise Stipulation to Extend Discovery; email from W Smith	0.08 260.00/hr	19.50
	- ELJ	Conference with W Smith and D Martin regarding Emergency Motion	0.15 260.00/hr	39.00
	- WJS	Review Notices from District Court regarding Motion to Reconsider and Order Shortening Time; review Motion; Research Caselaw, Reconsideration and Jurisdiction Issues; email to R Haskin regarding Hearing; conferences with E James and D Martin regarding preparation of Response and attending Hearing	0.53 260.00/hr	136.50
11/19/2018	- ELJ	Preparation of Opposition to Motion to Reconsider	0.95 260.00/hr	247.00
	- DEM	Research; email to W Smith; conference with E James	0.25 260.00/hr	65.00
	- KBC	Review Appeal Order and Order Shortening Time regarding Fees Hearing; conference with E James; email to L Wolff	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2018	- LJW	Review Motion to Reconsider and Order Shortening Time; emails to and from Attorneys	0.10 260.00/hr	26.00
11/20/2018	- ELJ	Preparation of Opposition to Motion to Reconsider and review with L Wolff	0.53 260.00/hr	136.50
	- LJW	Preparation of Opposition to Motion to Reconsider; telephone call to E James	0.68 260.00/hr	175.50
11/21/2018	- LJW	Revisions to Opposition to Motion to Reconsider; emails to and from E James and Clerk	0.30 260.00/hr	78.00
11/26/2018	- LJW	Review filed document	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court and Opposition; preparation for Hearing	0.38 260.00/hr	97.50
11/27/2018	- ELJ	Conference with W Smith regarding Motion to Reconsider Attorney's Fees and Finality of Appeal	0.15 260.00/hr	39.00
	- WJS	Preparation for Hearing; Appearance at Hearing on Motion to Reconsider Fees Order and present Arguments in Opposition; conferences with E James and D Martin re outcome and pending Appeal Issues; review Order to Show Cause from Supreme Court; Research Cases cited by Supreme Court; conferences with E James and D Martin; review possible Dismissal of Appeal; emails to and from R Haskin regarding Extension of Time for Briefing in 71698 Appeal; review draft Stipulation	1.08 260.00/hr	279.50
	- LJW	Telephone call with W Smith regarding Hearing and Appeal Issues	0.05 260.00/hr	13.00
11/28/2018	- LJW	Review Stipulation and Order; emails to and from W Smith	0.03 260.00/hr	6.50
12/4/2018	- KBC	Review Supreme Court Appeal Decision; conference with W Smith regarding Procedures and Recommendations	0.10 260.00/hr	26.00
	- LJW	Review Order from Appellate Court; telephone call to W Smith regarding Order; preparation of Response to Order to Show Cause	0.38 260.00/hr	97.50
	- WJS	Review Notice from Nevada Supreme Court regarding Boulden/Lamothe Appeal; review Order Affirming District Court; telephone call from Counsel for Dismans regarding Issues remaining in District Court; telephone call from L Wolff regarding Order, coordination and analysis of Actions to resolve remaining Appeals and Issues; conference with K Christensen	0.48 260.00/hr	123.50
12/5/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeals; preparation of Motion to Dismiss; emails to and from W Smith	0.40 260.00/hr	104.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018	- WJS	Research Attorney's Fees on Appeal; review Supreme Court's 12/4/18 Order and Arguments; file notes; email to L Wolff regarding Issues; emails to and from Haskin, Foley and Wang regarding Supreme Court Order; coordinate Conference Call; emails from L Wolff	0.45 260.00/hr	117.00
12/6/2018	- LJW	Review Court Order regarding Extension	0.03 260.00/hr	6.50
	- WJS	Emails to and from opposing counsel regarding Conference Call	0.03 260.00/hr	6.50
12/7/2018	- WJS	Teleconference with Counsel (Haskin, Foley, Wang) regarding Supreme Court Decision and potential Resolution; conference with K Christensen; telephone call to L Wolff; review Supreme Court filing; review CC&Rs; draft letter to R Haskin regarding Dismissal of Appeal and Warning of Sanctions	0.60 260.00/hr	156.00
	- KBC	Conference with W Smith; review Appeal and Trial Procedures; review Negotiations Issues	0.10 260.00/hr	26.00
	- LJW	Telephone call with W Smith regarding Motions	0.08 260.00/hr	19.50
12/10/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.50 260.00/hr	130.00
	- WJS	Email from L Wolff; review and revise letter to Haskin; email from D Foley	0.15 260.00/hr	39.00
12/11/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.60 260.00/hr	156.00
12/12/2018	- KBC	Review rescheduled Pre-Trial Conference, Calendar Call and Trial Dates for related Case; review emails regarding Fees Brief and Continuance Request	0.05 260.00/hr	13.00
	- LJW	Preparation of Response to Order to Show Cause; Research Federal and State Rules regarding Consolidation; emails to and from W Smith; calendar dates for Trial	0.50 260.00/hr	130.00
	- WJS	Email to L Wolff; review and redline draft Response to Order to Show Cause	0.60 260.00/hr	156.00
12/13/2018	- LJW	Review Response and Stipulation	0.03 260.00/hr	6.50
	- WJS	Revise and draft Response to Order to Show Cause; prepare for filing	0.40 260.00/hr	104.00
12/14/2018	- WJS	Review Notices from Supreme Court; email from D Foley	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2018	- KBC	Conference with Client regarding Appeal Issues and Lytle's Health Extension Request	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Lytle Response to Order to Show Cause	0.05 260.00/hr	13.00
12/18/2018	- LJW	Preparation of Response to Opposition to Order to Show Cause	0.25 260.00/hr	65.00
	- WJS	Emails to and from L Wolff regarding Order to Show Cause; email to D Foley and C Wange regarding Attorney's Fee Appeal; email from D Foley; review Stipulation for Dismissal of Remaining Claims in District Court Case	0.18 260.00/hr	45.50
12/19/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research on Hearing and on Frederic case	0.70 260.00/hr	182.00
	- WJS	Email from C Wang regarding Stipulation for District Court Case; email from R Haskin	0.05 260.00/hr	13.00
12/20/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research 54(b) Certification	0.50 260.00/hr	130.00
12/21/2018	- LJW	Preparation of Response to Lytle's Reply to Order to Show Cause; emails to and from W Smith	0.30 260.00/hr	78.00
	- WJS	Review and revise Response to Lytle's Reply to Order to Show Cause; review docket in District Court Case; email to L Wolff	0.25 260.00/hr	65.00
12/27/2018	- LJW	Review Order and calendar Due Date	0.03 260.00/hr	6.50
	- WJS	Email from R Haskin; review proposed changes to Dismissal Stipulation; review Notice from Supreme Court regarding Briefing Schedule; calendar Deadlines; conference with D Martin regarding Pre-Trial Conference	0.08 260.00/hr	19.50
1/3/2019	- WJS	E-mails from opposing counsel; review Redlines to draft Stipulation	0.08 260.00/hr	19.50
1/7/2019	- DEM	E-mails from and to W Smith; telephone calls to and from W Smith; review file	0.13 260.00/hr	32.50
	- WJS	Review Notice of Hearing; emails to and from and telephone calls to and from D Martin regarding Pre-Trial Conference; emails to and from opposing counsel regarding Stipulation; review draft	0.08 260.00/hr	19.50
1/8/2019	- WJS	Prepare for Pretrial Conference; Meeting with D Foley regarding Stipulation; Appearance for Pre-Trial Conference in Department 9 (D Barker); conference with D Foley regarding Fees and Costs; telephone call from C Wang regarding Appeal Issues, Fees and Costs; conference with K Christensen	0.60 260.00/hr	156.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
1/15/2019	- LJW	Review Stipulation and Order; telephone call to W Smith regarding Brief	0.08 260.00/hr	19.50
	- WJS	Review Notices from Supreme Court and Opening Brief filed by Lytle's in Case No. 76198; telephone call to L Wolff regarding Issues on Appeal, substance of Lytle's Brief; and preparation of Response Brief	0.18 260.00/hr	45.50
1/16/2019	- LJW	Preparation of Reply to Appellant's Brief	1.03 260.00/hr	266.50
	- WJS	Review Notices from District Court; review Boulden & Lamothe Memo of Costs and Motion for Fees	0.15 260.00/hr	39.00
1/17/2019	- WJS	Review and notate Lytle's Opening Brief	0.30 260.00/hr	78.00
1/18/2019	- LJW	Review Court Pleadings	0.03 260.00/hr	6.50
1/19/2019	- LJW	Preparation of Statement of Facts for Reply to Appellate Brief	0.55 260.00/hr	143.00
1/21/2019	- LJW	Preparation of Points and Authorities regarding Law of Case Doctrine	1.00 260.00/hr	260.00
1/22/2019	- LJW	Preparation of Points and Authorities regarding Equitable Orders	0.53 260.00/hr	136.50
1/23/2019	- LJW	Preparation of Points and Authorities regarding Macintosh Caselaw	0.50 260.00/hr	130.00
	- WJS	Review Notice from Court; review Dismar's Motion for Fees and Costs; review Docket for Hearing Dates	0.10 260.00/hr	26.00
1/24/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes	0.48 260.00/hr	123.50
1/28/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes; Research "Plain Meaning Cases"	0.28 260.00/hr	71.50
	- WJS	Review Notice from Supreme Court regarding Order Consolidating Appeals; email to L Wolff regarding Response; calendar new Deadlines	0.08 260.00/hr	19.50
1/29/2019	- LJW	Review Court Notice regarding Consolidation; calendar new Due Dates	0.05 260.00/hr	13.00
	- WJS	Review Notice from District Court; review Lytle's Opposition to Boulden/Lamothe Motion for Fees and Costs	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2019	- LJW	Review NRED 3 Litigation; review Opposition to Motion for Fees; preparation of Points and Authorities regarding "Plain Meaning" of Statutes	0.30 260.00/hr	78.00
2/1/2019	- LJW	Preparation of Points and Authorities on Plain Meaning of Statute	0.18 260.00/hr	45.50
2/4/2019	- LJW	Preparation of Points and Authorities on Statute; review Opposition to Motion to Retax Costs	0.18 260.00/hr	45.50
	- WJS	Review Notice from District Court; review Lamothe/Boulden Opposition to Motion to Retax Costs	0.05 260.00/hr	13.00
2/5/2019	- LJW	Preparation of Points and Authorities on Application of NRS 116.3117	0.33 260.00/hr	84.50
2/7/2019	- LJW	Research NRS 116.3117 and Judgment Liens	0.58 260.00/hr	149.50
2/8/2019	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.13 260.00/hr	32.50
2/11/2019	- WJS	E-mail from R Haskin regarding Order on Motion to Reconsider, Analysis and Order Issues	0.08 260.00/hr	19.50
	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.50 260.00/hr	130.00
2/12/2019	- ELJ	Conference with W Smith regarding Mootness of Order and Appeal Issues	0.08 260.00/hr	19.50
	- WJS	Conference with E James regarding Haskin's request; Research; emails to and from R Haskin regarding Motion to Reconsider and Extension Request; Notice from District Court and review Lytle Opposition to Disman Fee Motion; review Notice from Supreme Court and review Lytle Motion for Extension of Time to File Brief in Fees Case; emails to and from L Wolff regarding Extension Request	0.40 260.00/hr	104.00
	- LJW	Preparation of Summary of Facts on Answering Brief; Research Extension of Time to Answer Attorney's Argument Brief; email to W Smith; review Motion by Lytle regarding Extension of Time	0.55 260.00/hr	143.00
2/13/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief; review Court Order regarding Extension of Time	0.20 260.00/hr	52.00
	- WJS	Review Notice and Order from Supreme Court Granting Extension; calendar new Deadlines	0.05 260.00/hr	13.00
2/14/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief	0.45 260.00/hr	117.00
2/18/2019	- LJW	Review Reply to Opposition	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2019	- LJW	Preparation of Statement of Facts for Appellate Response	0.25 260.00/hr	65.00
	- WJS	Review Notices from District Court; review Minute Order	0.03 260.00/hr	6.50
2/21/2019	- LJW	Preparation of Statement of Facts for Appellate Response	0.45 260.00/hr	117.00
2/27/2019	- WJS	Review Notice from District Court regarding Hearing on Motion for Fees and Costs; review Docket	0.08 260.00/hr	20.80
3/13/2019	- WJS	Review Notice from Supreme Court and Motion to Extend; conference with L Wolff; draft and file Response to Motion to Extend	0.35 260.00/hr	91.00
3/14/2019	- WJS	Review Notices from Supreme Court; Research Dockets and Court calendar regarding District Court scheduled Hearings; emails to and from D Foley and C Wang regarding Hearing on Fees Motion	0.13 260.00/hr	32.50
	- LJW	Review Motion to Extend Time; emails to and from W Smith; telephone call to W Smith regarding Motion	0.20 260.00/hr	52.00
3/15/2019	- LJW	Review Reply to Opposition; emails to and from W Smith	0.08 260.00/hr	19.50
	- WJS	Review from Supreme Court; review Reply filed by R Haskin; emails to and from L Wolff	0.08 260.00/hr	19.50
3/19/2019	- LJW	Review Notice from Court	0.03 260.00/hr	6.50
4/10/2019	- WJS	Preparation for and Appearance at Hearing of Fees and Costs Motions filed by other Plaintiffs; review Notice from Court regarding new Hearing Date before Judge Williams; emails to and from opposing counsel	0.35 260.00/hr	91.00
4/22/2019	- LJW	Review filings regarding Extensions of Time; emails to and from W Smith; calendar Due Dates	0.08 260.00/hr	19.50
	- WJS	Review Notice from District Court regarding Order on Stipulation to Continue Hearing; review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule; emails to and from L Wolff; draft and file Opposition to Motion to Continue	0.20 260.00/hr	52.00
4/23/2019	- LJW	Review Motion and Opposition	0.03 260.00/hr	6.50
4/26/2019	- LJW	Review Reply to Opposition	0.03 260.00/hr	6.50
	- KBC	Conference with W Smith regarding Extension Motion and Opposition; calendar Hearing	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2019	- WJS	Review Notice from Supreme Court regarding Lytle Reply Brief; email from D Foley regarding Issues for Hearing; conference with K Christensen regarding status of Case and Briefing Schedule	0.15 260.00/hr	39.00
5/2/2019	- LJW	Review Court Order regarding Extension; emails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Order Denying Lytle Motion for Extension of Briefing Deadlines; emails to and from L Wolff; email to D Foley and C Wang	0.05 260.00/hr	13.00
5/7/2019	- WJS	Review Notice from District Court; review Motion to Set Hearing filed by Lytles	0.08 260.00/hr	19.50
5/15/2019	- WJS	Review emails from R Haskin; emails to and from and telephone call from D Foley regarding Hearing; review Court Pleadings and papers and preparation for Hearing	0.15 260.00/hr	39.00
5/16/2019	- WJS	Prepare for and attend Hearing at RJC (Judge Williams) on Motions for Fees and Costs (other Plaintiffs); case notes; Notices from Supreme Court regarding Lytle Opening Brief on Fees Appeal; emails to and from L Wolff	0.88 260.00/hr	227.50
	- LJW	Review Opening Brief and Appendices	0.15 260.00/hr	39.00
5/17/2019	- WJS	Review Notice from District Court and Minute Order Granting Fee Motions	0.05 260.00/hr	13.00
5/20/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
	- WJS	Review and annotate Lytle Opening Brief on Fees	0.38 260.00/hr	97.50
5/21/2019	- LJW	Telephone call to W Smith regarding Answering Brief; email to Court Clerk regarding Transcript; preparation of Answering Brief	0.38 260.00/hr	97.50
5/22/2019	- LJW	E-mails to and from Court Clerk	0.03 260.00/hr	6.50
5/28/2019	- KBC	Review Judgment Renewal Notice; emails to and from Attorney	0.05 260.00/hr	13.00
6/3/2019	- LJW	Preparation of Reply Brief; Research Standard of Review for Attorney's Fees and Costs on Appeal	0.70 260.00/hr	182.00
6/4/2019	- LJW	Research Law of the Case	0.40 260.00/hr	104.00
6/5/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	1.00 260.00/hr	260.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	0.88 260.00/hr	227.50
6/7/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees	1.75 260.00/hr	455.00
6/10/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees; telephone call to W Smith regarding Facts Section	1.25 260.00/hr	325.00
	- WJS	Telephone call from L Wolff regarding Arguments for Appeal Brief	0.15 260.00/hr	39.00
6/11/2019	- LJW	Preparation of Reply Brief; review and revise Citations to Law and Record; review Transcript and add to Brief; preparation of Exhibits for Appendix; revise Citations to Appendix	1.75 260.00/hr	455.00
6/12/2019	- LJW	Preparation of Reply Brief; preparation of Fact Section; preparation of Appendix	1.05 260.00/hr	273.00
	- WJS	Review and Redline draft Reply Brief; draft Answering Brief on Consolidated Appeals, Research	1.93 260.00/hr	500.50
6/13/2019	- LJW	Preparation of Appendix; Citations to Record; emails to and from W Smith	0.70 260.00/hr	182.00
	- WJS	Research and draft Answering Brief; review Documents for Respondents' Appendix, preparation of Appendix	1.63 260.00/hr	422.50
6/14/2019	- WJS	Preparation of Respondents' Appendix; review and revise Answering Brief	0.45 260.00/hr	117.00
	- LJW	Preparation of Appendix; revisions to Citations to Record; emails to and from W Smith; review Appellate Rules regarding Appendices and Documents	0.70 260.00/hr	182.00
6/17/2019	- WJS	Preparation of Table of Contents; review and revise Answering Brief; prepare Certifications; sign and prepare Brief and Appendix for filing	1.65 260.00/hr	429.00
6/18/2019	- WJS	Review Notice from Court; emails to and from L Wolff; review Notice form Court	0.05 260.00/hr	13.00
6/19/2019	- WJS	Review Order, make adjustments to Brief and prepare for filing; conference with Clerk regarding filing; review Court Notices regarding Acceptance of Filing	0.15 260.00/hr	39.00
	- LJW	Review Appellate Motion	0.05 260.00/hr	13.00
7/15/2019	- WJS	Emails to and from R Haskin; review Agreement and Appellant filings	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2019	- WJS	Email from R Haskin; review draft Extension Stipulation; review Notices from Supreme Court	0.03 260.00/hr	6.50
8/5/2019	- WJS	Emails to and from R Haskin; review and approve Stipulation	0.03 260.00/hr	6.50
8/19/2019	- WJS	Review Notice from Supreme Court; review Motion and Lytle Reply Brief; email to L Wolff	0.15 260.00/hr	39.00
8/20/2019	- LJW	Review Motions and Research Brief and Opposition	0.28 260.00/hr	71.50
8/21/2019	- WJS	Emails to and from L Wolff regarding Response to Lytle Reply Brief	0.05 260.00/hr	13.00
	- LJW	Review Motions and Research Brief and Opposition; emails to and from W Smith	0.58 260.00/hr	149.50
8/22/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.65 260.00/hr	169.00
8/23/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.55 260.00/hr	143.00
8/26/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit; emails to and from W Smith	0.60 260.00/hr	156.00
	- WJS	Review and revise Opposition and Countermotion; review Notice from Court	0.10 260.00/hr	26.00
8/27/2019	- LJW	Review and download Court Order	0.03 260.00/hr	6.50
9/3/2019	- LJW	Review and download Pleading	0.03 260.00/hr	6.50
9/4/2019	- WJS	Review Supreme Court filings from Lytles; emails to and from Counsel for Dismar regarding Stay of Execution and Fees Order	0.08 260.00/hr	19.50
9/30/2019	- WJS	Review Notice from Court regarding Appeal of Attorneys Fee Order; review Supreme Court Docket regarding Appeal	0.08 260.00/hr	19.50
10/1/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
10/4/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Appeal of Boulden/Lamothe Fee Order	0.03 260.00/hr	6.50
10/22/2019	- WJS	Review Notice from District Court regarding Stipulation to Stay Execution, Posting on Bond; review Notice from Supreme court regarding Association of Counsel for Lytle	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2019	- WJS	Review Notices from Court regarding Appearance for Lytle and request for Transcripts	0.03 260.00/hr	6.50
12/4/2019	- KBC	Conference with W Smith regarding Hearing and Order Appointing HOA Receiver	0.06 260.00/hr	16.25
	- WJS	Telephone call from K Christensen regarding Appointment of Receiver over Association, review Case History and Minutes of Proceedings; email to K Christensen and email to Clerk	0.20 260.00/hr	52.00
1/13/2020	- LJW	Review Court order regarding Lamothe	0.03 260.00/hr	6.50
1/21/2020	- WJS	Review Order from Supreme Court; Research; draft Response	0.35 260.00/hr	91.00
1/24/2020	- WJS	Conference with K Christensen and K Kearl regarding Receiver; review Case file; email to K Christensen with documents; conference with K Christensen	0.30 260.00/hr	78.00
	- KBC	Review Orders; Research; telephone call from Client regarding HOA Judgment and Receiver correspondence; conference with Client and W Smith; review CCRs, Receiver Documents and preparation for conference with Client	0.48 260.00/hr	123.50
1/27/2020	- WJS	Research; conference with K Christensen; preparation for conference with Clients; telephone call from C Wang; conference with Clients; draft letter to Receiver; email to L Wolff	0.75 260.00/hr	195.00
	- KBC	Review Receiver letter and Orders; review Injunction; Research; conference with W Smith regarding Contempt, Fees, Motion to Vacate and Sanctions; conference with Clients regarding Demand and Motions	0.63 260.00/hr	162.50
1/28/2020	- DEM	Conference with W Smith; review letter to Receiver	0.18 260.00/hr	45.50
	- WJS	Emails to and from L Wolff; draft letter to Receiver; Research; conference with D Martin regarding revisions; preparation of Exhibits; email to K Christensen; conference with K Christensen	0.60 260.00/hr	156.00
	- KBC	Review letter to Receiver and Attorney; email to Attorney; conference with W Smith	0.06 260.00/hr	16.25
	- LJW	Review letter to Client and Court filings; email to W Smith	0.13 260.00/hr	32.50
1/29/2020	- LJW	E-mails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Emails to and from D Foley regarding letter from Receiver; revise letter to Receiver; email from J Gegen; email to Clients	0.13 260.00/hr	32.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2020	- LJW	E-mails to and from W Smith; preparation of Motion for Order to Show Cause	0.50 260.00/hr	130.00
	- WJS	Review follow-up letter from Receiver; conference with K Christensen; email to L Wolff regarding drafting Motion	0.05 260.00/hr	13.00
	- KBC	Review letter from Receiver canceling Meeting; conference with W Smith; conference with Client	0.06 260.00/hr	16.25
2/4/2020	- KBC	Conference with W Smith regarding Motion for OTSC and Contempt; emails to and from Attorney regarding Motion; review Hearing Notice	0.06 260.00/hr	16.25
	- WJS	Review notification from Court; review Motion to Reduce to Judgment from old Case; conference with K Christensen; Research Dockets; conference with L Wolff regarding Motion	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith; preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.90 260.00/hr	234.00
2/5/2020	- WJS	E-mail from J Gegen; review letters	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.38 260.00/hr	97.50
2/6/2020	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.28 260.00/hr	71.50
2/10/2020	- WJS	E-mails to and from D Foley; review Renewed Motion to Appoint Receiver; messages to and from L Wolff; Research	0.40 260.00/hr	104.00
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.53 260.00/hr	136.50
2/11/2020	- KBC	Calendar Hearing; conference with W Smith; review Motion	0.03 260.00/hr	6.50
	- WJS	Messages to and from L Wolff regarding Receiver Report	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	1.00 260.00/hr	260.00
2/12/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegan; preparation of Affidavit for W Smith	1.93 260.00/hr	500.50
2/13/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegen; preparation of Affidavit for W Smith	1.08 260.00/hr	279.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2020	- WJS	E-mail from L Wolff; review and revise Motion for Order to Show Cause	0.25 260.00/hr	65.00
	- LJW	Preparation of Motion to Intervene	1.03 260.00/hr	266.50
2/18/2020	- LJW	Preparation of Motion to Intervene; preparation of Affidavits	0.63 260.00/hr	162.50
2/19/2020	- LJW	Preparation of Motion to Intervene; preparation of Affidavits	0.80 260.00/hr	208.00
2/20/2020	- LJW	Preparation of Motion to Strike Order	0.80 260.00/hr	208.00
2/21/2020	- WJS	Drafting and revisions to Motion for Order to Show Cause	0.80 260.00/hr	208.00
	- LJW	Preparation of Motion to Intervene	0.55 260.00/hr	143.00
2/22/2020	- LJW	Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/24/2020	- WJS	Drafting and revisions to Motion for Order to Show Cause	1.05 260.00/hr	273.00
	- LJW	Preparation of Motion to Intervene	0.73 260.00/hr	188.50
2/25/2020	- WJS	Drafting and revisions to Motion for Order to Show Cause; Research; email to L Wolff	1.30 260.00/hr	338.00
	- LJW	Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/26/2020	- WJS	E-mails to and from L Wolff	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion to Intervene	0.53 260.00/hr	136.50
3/2/2020	- WJS	Review and revise Motion to Intervene; Research; review Notice from Nevada Supreme Court; review Order Submitting for Decision; draft Affidavits; review Notice from NSC; review Order of Affirmance; conference with K Christensen; revisions to Motion for Order to Show Cause and Motion to Intervene	1.50 260.00/hr	390.00
3/3/2020	- WJS	E-mails to and from L Wolff; review and revise Motions and Affidavits; emails to Client regarding Affidavits; preparation of Exhibits; meet with Zobrist and Kearn; telephone call from L Wolff	0.70 260.00/hr	182.00
	- LJW	Review Affirmance Order from Supreme Court; telephone call to W Smith	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2020	- WJS	Emails to and from D Foley and C Wang; Research Court Rules; draft Bill of Costs on Appeal; Research Supersedeas Bond; notes to file; meet with Julie Gegen regarding Affidavits; revisions to Motions; prepare Motions and Exhibits for filing	0.65 260.00/hr	169.00
3/5/2020	- WJS	Review Notices from Court regarding Hearings, calendar and send emails to Counsel; draft Bill of Costs; finalize and prepare for filing; review Notices from Supreme Court	0.18 260.00/hr	45.50
3/6/2020	- KBC	Conference with W Smith regarding proposed Motion and Hearing Stipulation and Issues; review email from new opposing counsel	0.09 260.00/hr	22.75
	- WJS	Review Notice; review Joinders filed by C Wang and D Foley; email to Clients; email from D Waite regarding Stipulation to Intervene; conference with K Christensen	0.20 260.00/hr	52.00
3/9/2020	- WJS	Research Intervention Rules; telephone call from D Waite regarding Stipulation to Intervene; telephone call from C Wang; telephone call from R Disman; email from D Waite and review and redline draft Stipulation; review Court Notices	0.60 260.00/hr	156.00
	- LJW	Review Pleadings; email to W Smith	0.03 260.00/hr	6.50
3/10/2020	- KBC	Conference with W Smith regarding requested Stipulation to Intervene, OTSC, Attorney's Fees and Receiver Issues; review Attorney emails	0.10 260.00/hr	26.00
	- WJS	E-mails from D Waite regarding Settlement Offer and Stipulation on Motion to Intervene; conference with K Christensen; draft revisions to Stipulation; emails to and from L Wolff; emails to and from D Waite; telephone call from D Foley; conference with Clerk regarding Fees Statements	0.35 260.00/hr	91.00
	- LJW	Review revised Stipulation and Order; emails to and from W Smith	0.05 260.00/hr	13.00
3/11/2020	- WJS	E-mails from D Waite; review and analysis of Stipulation redline; preparation for Status Hearing in Receiver Action; check Docket; email to Counsel for Receiver	0.40 260.00/hr	104.00
	- LJW	Preparation of Motion to Set Aside Order	0.78 260.00/hr	201.50
3/12/2020	- KBC	Conference with W Smith; preparation of Motion to Vacate Order; review D Waitz letter to Receiver	0.08 260.00/hr	19.50
	- ELJ	Meeting with W Smith regarding opposing Arguments (.7); Research Caselaw on Unclean Hands and Fraud on Court; email to W Smith and L Wolff with Caselaw and Arguments	0.65 260.00/hr	169.00
	- WJS	Preparation for Hearing; Appearance at Status Hearing in Receivership Case; telephone call to L Wolff regarding Motion; email from Receiver's Counsel, review January Status Report; letter from D Waite - analysis; conference with Clerk regarding	1.20 260.00/hr	312.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020	- LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
	- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020	- WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
	- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
	- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020	- WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020	- WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020	- LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020	- WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020	- WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
	- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2020	- WJS	Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS	Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW	Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS	Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW	Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS	Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS	Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS	Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2020	- WJS	Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff	0.28 260.00/hr	71.50
	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date	1.48 260.00/hr	383.50
4/11/2020	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.38 260.00/hr	97.50
4/13/2020	- WJS	Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley	2.38 260.00/hr	617.50
	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall	1.75 260.00/hr	455.00
4/14/2020	- LJW	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk	1.85 260.00/hr	481.00
	- WJS	Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff	1.25 260.00/hr	325.00
4/15/2020	- WJS	E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff	1.20 260.00/hr	312.00
	- LJW	Review filings and emails; email to W Smith	0.05 260.00/hr	13.00
4/16/2020	- DEM	Research recent Nevada HOA Caselaw; email to W Smith	0.25 260.00/hr	65.00
4/17/2020	- WJS	E-mail from D Martin and review new Supreme Court Opinion	0.10 260.00/hr	26.00
4/20/2020	- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond	0.30 260.00/hr	78.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2020	- WJS	Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020	- WJS	Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
	- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020	- KBC	Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
	- WJS	Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
	- LJW	Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020	- LJW	Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
	- WJS	Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020	- WJS	Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
	- LJW	Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020	- WJS	E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020	- LJW	Review emails and revised Order	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2020	- LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
		For professional services rendered	144.28	\$37,350.80
		Additional Charges :		
			<u>Qty/Price</u>	
5/24/2018	- N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018	- LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018	- N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018	- N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018	- N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018	- N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018	- N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018	- N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018	- N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018	- N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018	- N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018	- N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018	- N	Clark County District Court Download Fee	0.25 2.00	0.50

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			<u>Qty/Price</u>	<u>Amount</u>
8/31/2018 - N	WestLaw Research 8/1-8/31/18		0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)		0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs		0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18		0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay		0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18		0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider		0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18		0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider		0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)		0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)		0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019		0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal		0.25 443.54	110.89
6/30/2019 - N	WestLaw Research		0.25 301.54	75.39
8/31/2019 - N	WestLaw Research		0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020		0.25 31.81	7.95

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			<u>Qty/Price</u>	<u>Amount</u>
2/4/2020 - N	Clark County District Court Document Download - Order on Receivership		0.25 5.50	1.38
2/5/2020 - N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver		0.25 101.97	25.49
2/11/2020 - N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses		0.25 19.00	4.75
2/29/2020 - N	WestLaw Research - February 2020		0.25 528.58	132.15
3/4/2020 - N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders		0.25 3.50	0.88
- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure		0.25 356.79	89.20
3/11/2020 - N	Court Parking Expense at Hearing		0.25 6.00	1.50
3/26/2020 - N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order		0.25 3.50	0.88
3/31/2020 - N	WestLaw Research (March 2020)		0.25 683.39	170.85
4/10/2020 - N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)		0.25 3.50	0.88
4/13/2020 - N	District Court Filing Fee - Notice to Appear (A-18-775843-C)		0.25 3.50	0.88
4/14/2020 - N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)		0.25 3.50	0.88
4/15/2020 - N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)		0.25 51.00	12.75
4/30/2020 - N	WestLaw Research April 2020		0.25 250.87	62.72

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		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	<u>144.28</u>	\$38,387.07

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Exhibit 7

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Exhibit 7

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(4)

DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS
(CC and R's)

This Declaration of Covenants, Conditions and Restrictions made this 21st Day of Jan, 1974 by Baughman & Turner Pension Trust hereinafter referred to as "Subdivider", owner in fee simple of the land situated in the City of Las Vegas, County of Clark, State of Nevada, described as follows:

Lots 1 through 9 of Rosemere Court, a subdivision, recorded in Book 59 of Plats, Page 58, Clark County Records, Nevada.

WHEREAS, it is the desire and intention of Subdivider to sell the land described above and to impose on it mutual, beneficial covenants, conditions and restrictions under a general plan or scheme of improvement for the benefit of all the land described above and the future owners of the lots comprising said land,

NOW, THEREFORE, Subdivider hereby declares that all of the land described above is held and shall be held, conveyed, hypothecated or encumbered, leased, rented, used, occupied and improved subject to the following covenants, conditions and restrictions, all of which are declared and agreed to be in furtherance of a plan for the subdivision, improvement and sale of said land and are established and agreed upon for the attractiveness of said land and lots and every part thereof. All of such covenants, conditions and restrictions shall run with the land and shall be binding on the Subdivider and on all of its heirs, successors and assigns and on all other parties having or occupying any right, title, or interest in the described land or any part thereof, and on all of their heirs, successors and assigns.

A breach or violation of these CC & R's or any re-entry by reason of such breach or any liens established hereunder shall not defeat or render invalid or modify in any way the lien of any mortgage or deed of trust made in good faith and for value as to said lots or PROPERTY or any part thereof; that these CC & R's shall be binding and effective against any owner of said PROPERTY whose title thereof is acquired by foreclosure, trustee's sale or otherwise.

1. Lots shall be used for private one-family residential purposes exclusively. Customary out-buildings including guest house, hobby house, private garages or carports may be erected or maintained therein, consistent with City of Las Vegas Zoning Ordinances.

2. All lavatories and toilets shall be built indoors and be connected with the existing sewer system.

3. No aerial transmission or reception of television or radio signals shall be maintained on the roof of any structure within subdivision. In addition, no cooling or heating units shall be visible on the roof of any structure within subdivision.

SECTION 2.41

4. No rubbish, brush, weeds, undergrowth or debris of any kind or character shall ever be placed or permitted to accumulate upon said lots so as to render said premises a fire hazard, unsanitary, unsightly, offensive or detrimental to any other property in the vicinity or the occupants thereof. Trash containers shall be visible on days of trash pick-up only. The Owner of the lot, for himself, his successors and assigns agrees to care for, cultivate, prune and maintain in good condition any and all trees, lawns and shrubs.

5. No odors shall be permitted to arise therefrom so as to render any such lot unsanitary, unsightly, offensive or detrimental to any other lot and no nuisance shall be permitted to exist or operate upon any lot so as to be offensive or detrimental to any other lot or to the occupants thereof; and without limiting the generality of any of the foregoing provisions, no horns, whistles, bells or other sound devices, except devices used exclusively for security purposes, shall be located, used or placed upon any lots. Stereo speakers may be used at reasonable volume levels.

No structure (including but not limited to dwelling units, garages, carports, walls and fences) shall be permitted to fall into disrepair and all structures shall at all times be kept in good condition and repair and adequately painted or otherwise finished. Any and all repairs, redecorations, modifications or additions, interior and exterior, shall fully comply with all restrictions.

7. No owner shall permit any thing or condition to exist upon any lot which shall induce, breed or harbor infectious plant disease or noxious insects.

8. For continuity of the neighborhood appearance, every single-family dwelling erected shall be of Spanish, Moorish, Mediterranean or similar-style architecture, and shall have a tile roof, face into the cul-de-sac and contain not less than 3,000 square feet of floor space for one-story homes and 3,500 square feet of floor space for two-story homes, exclusive of basements, porches, patios, garages, carports, guest or hobby houses.

9. Driveways for Lots 1 and 9 must enter the cul-de-sac and not the entrance street.

10. Building plans of residences to be erected shall be approved by Subdivider prior to start of construction.

11. Easements for installation and maintenance of utilities and drainage facilities have been conveyed as shown on the recorded subdivision plat and otherwise of record.

12. No billboards, signs, or advertising of any kind excepting a conventional "for sale" or "for rent" sign not larger than two feet by two feet shall be erected or maintained upon any of said lots without the written consent of Subdivider.

13. No animals or fowl, other than household pets, shall be kept or maintained on said property or any portion thereof. At any one time the total number of household pets shall not exceed four. No horses shall be allowed within the subdivision at any time.

14. Each Owner of a lot agrees for himself and his successors and assigns that he will not in any way interfere with the natural or established drainage of water over his lot from adjoining or other lots in said subdivision, or that he will make adequate provisions for proper drainage in the event it is necessary to change the natural or established flow of water drainage over his lot. For the purpose herein, natural drainage is defined as the drainage which occurred or which would occur at the time the overall grading of said subdivision, including the finish grading of each lot in said parcel was completed by the Subdivider.

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15. Landscaping in front of a residence shall be completed within three (3) months from completion of construction of that residence. Landscaping shall meet or surpass VA and FHA standards.

16. No clotheslines shall be placed nor shall any clothes be hung in any manner whatsoever on any lot in a location visible from a public street.

16. No boat, trailer, mobile home, camper or commercial vehicles may be parked at any time within the private drive (street) area. In addition, no automobile, camper, mobile home, commercial vehicle, truck, boat or other equipment may be dismantled on any lot in an area visible from an adjoining property or the street area.

17. No boat, trailer, mobile home, camper, or commercial vehicle may be parked or stored at any time on any lot in an area visible from adjoining properties or streets. Additionally, no automobile, camper, mobile home, commercial vehicle, truck, boat or other equipment may be dismantled or stored on any lot in an area visible from adjoining properties or streets.

18. No commercial tools, equipment, commercial vehicles, structures or other commercial appurtenances shall be stored at any time on any lot.

19. Purchasers/Owners shall on an equal share basis, assume responsibility to maintain any and all off-site improvements which have been installed by Subdivider.

20. Purchasers/Owners or their successors in interest shall assume responsibility to maintain walls erected by Subdivider. Side and front walls shall be of the same type and color as presently installed and shall be erected within three months from completion of construction of house on said lot. Cost of side walls shall be agreed upon and equally shared by adjoining property owners. In the event side walls are already erected at time of purchase of lot, the Purchaser of that lot shall pay the adjoining lot owner who previously erected said wall one half (1/2) the cost as proven by his paid receipts. Payment shall be made within sixty (60) days from date of purchase of said lot.

21. A property owners committee shall be established by all owners of lots within the subdivision.

a. The committee shall determine the type and cost of landscaping on the four (4) exterior wall planters, and the entrance-way planters. The committee shall also determine the method and cost of watering and maintaining planters. All costs shall be equally shared by all owners of lots within the subdivision. In the event of any disagreement, the majority shall rule.

b. The exterior perimeter wall along the Oakley, Tanaya and El Parque frontage shall be maintained and/or repaired when appropriate, under the direction of the property owners committee. The costs to be equally shared by all 9 lot owners.

c. The Entrance Gate and it's related mechanical and electrical systems shall be maintained and/or repaired on an equal share basis by all lot owners.

d. The Private Drive (the interior street) used for ingress and egress purposes by all lots within the subdivision shall be maintained and/or repaired on an equal share basis by all owners of lots within the subdivision.

22. Construction trailers or mobile homes will not be permitted on any lot within the subdivision.

3 of 4

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23. Each of the provisions of these covenants, conditions and restrictions shall be deemed independent and severable and the invalidity or partial invalidity of any provision or portion thereof, shall not effect validity or enforceability of any other provision.

24. Except as otherwise provided herein, Subdivider or any owner or owners of any of the lots shall have the right to enforce any or all of the provisions of the covenants, conditions and restrictions upon any other owner or owners. In order to enforce said provision or provisions, any appropriate judicial proceeding in law or in equity may be initiated and prosecuted by any such lot owner or owners against any other owner or owners.

25. Attorney's Fees: In any legal or equitable proceeding for the enforcement of or to restrain the violation of the Declaration of Covenants, Conditions and Restrictions or any provision thereof, the losing party or parties shall pay in such amount as may be fixed by the court in such proceeding.

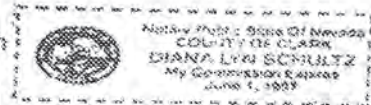
IN WITNESS WHEREOF, said Owner/Subdivider Baughman & Turner Pension Trust of Nevada, has herunto affixed their signatures.

Date: 1/4/94 Stephen F. Turner
Owner/Subdivider/Trustee Stephen F. Turner

Date: 1-4-94 Richard J. Baughman
Owner/Subdivider/Trustee Richard J. Baughman

On this 4th day of JANUARY, 1994,
before me, the undersigned, a Notary Public in
and for said County and State, Personally appeared

Stephen F. Turner & Richard J. Baughman



(this area for official seal)

Diana Lynn Schultz
Notary Public in and for said County and State

When Recorded Mail To:
Baughman & Turner, Inc.,
1210 Hinson Street
Las Vegas, NV 89102

4 of 4

CLARK COUNTY, NEVADA
JOAN L. SWIFT, RECORDER
RECORDED AT REQUEST OF:
BAUGHMAN & TURNER INC
01-04-94 14102 PDR 4
OFFICIAL RECORDS
BOOK: 940104 INST: 01041
FEE: 10.00 RPTX .00

9

9

DECL
CHRISTENSEN JAMES & MARTIN
KEVIN B. CHRISTENSEN, ESQ. (175)
WESLEY J. SMITH, ESQ. (11871)
LAURA J. WOLFF, ESQ. (6869)
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Las Vegas, Nevada 89117
Tel.: (702) 255-1718
Facsimile: (702) 255-0871
Email: kbc@cjmlv.com; wes@cjmlv.com; ljw@cjmlv.com
*Attorneys for September Trust, Zobrist Trust, Sandoval Trust,
and Dennis & Julie Gegen*

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

MARJORIE B. BOULDEN, TRUSTEE OF
THE MARJORIE B. BOULDEN TRUST, *et al.*,

Plaintiffs,

vs.

TRUDI LEE LYTLE, *et al.*,

Defendants.

Case No.: A-16-747800-C
Dept. No.: XVI

**DECLARATION OF COUNSEL IN
SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEY'S
FEES AND COSTS**

SEPTEMBER TRUST, DATED MARCH 23,
1972, *et al.*,

Plaintiffs,

vs.

TRUDI LEE LYTLE AND JOHN ALLEN
LYTLE, AS TRUSTEES OF THE LYTLE
TRUST, *et al.*,

Defendants.

Case No.: A-17-765372-C
Dept. No.: XVI

Consolidated

DECLARATION OF WESLEY J. SMITH, ESQ.

STATE OF NEVADA)

:ss.

COUNTY OF CLARK)

Wesley J. Smith, Esq., being first duly sworn and under penalty of perjury of the laws of
the United States of America and the State of Nevada:

CHRISTENSEN JAMES & MARTIN
7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117
PH: (702) 255-1718 & FAX: (702) 255-0871

000294

1 1. I am at least 18 years of age and of sound mind. I personally prepared this
2 Declaration and I am familiar with all factual statements it contains, which I know to be true and
3 correct, except for any statements made on information and belief, which statements I believe to
4 be true. I am competent to testify to the same and would so testify if called upon as a witness.

5 2. I am an attorney licensed to practice before all state and federal courts of the State
6 of Nevada.

7 3. I am a partner and shareholder in Christensen James & Martin, Chtd. ("CJM"),
8 counsel for the Plaintiffs, September Trust, dated March 23, 1972 ("September Trust"), Gerry R.
9 Zobrist and Jolin G. Zobrist, as Trustees of the Gerry R. Zobrist and Jolin G. Zobrist Family
10 Trust ("Zobrist Trust"), Raynaldo G. Sandoval and Jule Marie Sandoval Gegen, as Trustees of
11 the Raynaldo G. and Evelyn A. Sandoval Joint Living and Devolution Trust Dated May 27, 1992
12 ("Sandoval Trust"), and Dennis A. Gegen and Julie S. Gegen, Husband and Wife as Joint
13 Tenants (hereafter "Gegen") (collectively referred to as "Plaintiffs") in the above-captioned case.
14

15 4. I make this Declaration in support of Plaintiffs' Motion for Attorney's Fees and
16 Costs ("Motion").
17

18 5. A true and correct copy of the Nevada Supreme Court Order of Affirmance on
19 the July 2017 Order, *Lytle v. Boulden*, No. 73039, 432 P.3d 167, 2018 WL 6433005 (Nev. Dec.
20 4, 2018) (unpublished) is attached to the Motion as Exhibit 1.

21 6. A true and correct copy of the Nevada Supreme Court Order entered on March 2,
22 2020 affirming the May 2018 Order (also available at *Lytle v. Sept. Tr., Dated Mar. 23, 1972*,
23 No. 76198, 2020 WL 1033050 (Nev. Mar. 2, 2020) (Table)), is attached to the Motion as Exhibit
24 2.
25

26 7. On or about September 26, 2017, CJM sent a letter on behalf of Plaintiffs to
27 Defendants' attorney requesting that the liens be expunged from Plaintiffs' properties based on
28

the Court's Order entered in the Boulden and Lamothe case. A true and correct copy of this letter is attached the Motion as Exhibit 3.

8. A true and correct copy of the letter I sent to Richard Haskins, Esq. on December 10, 2018, is attached to the Motion as Exhibit 4.

9. A true and correct copy of the letter I sent to the Receiver, with copy to counsel for the Lytle Trust, on January 29, 2020 is attached to the Motion as Exhibit 5.

10. Exhibits 6A, 6B, 6C, and 6D are true and correct copies of billing statements from Christensen James & Martin ("CJ&M") to the Plaintiffs September Trust, Zobrist Trust, Sandoval Trust and Gegen, respectively, which detail the tasks performed and attorney's fees and costs incurred from May 23, 2018 through April 30, 2020.

11. A true and correct copy of Original CC&Rs, which has not been disputed, is attached to the Motion as Exhibit 7.

12. In this case, the four Plaintiffs have shared the costs and expenses of the litigation equally. Each Plaintiff has been billed for one fourth of the time spent in this matter, multiplied by the hourly rate. For instance, if one hour of attorney time was spent, each Plaintiff was billed one quarter (0.25) of an hour multiplied by the hourly rate of \$260.00. The sharing of fees and costs resulted in a cost saving and reduced the burden on the courts. If each property owner had retained separate counsel and initiated its own action, the fees would have been much higher. From March 23, 2018 through April 30, 2020, the total amount incurred in attorney's fees and costs is \$153,548.28, broken out between the Plaintiffs as follows:

Plaintiff	Attorney's Fees	Costs	Total
September Trust	\$ 37,350.80	\$ 1,036.27	\$38,387.07
Zobrist Trust	\$ 37,350.80	\$ 1,036.27	\$38,387.07
Sandoval Trust	\$ 37,350.80	\$ 1,036.27	\$38,387.07

Gegen	\$ 37,350.80	\$ 1,036.27	\$38,387.07
Totals	\$149,403.20	\$ 4,145.08	\$153,548.28

13. I submit that the amount of attorney's fees requested is consistent with the factors as set forth *Brunzell v. Golden Gate Nat'I Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), as follows:

a. *The Professional Qualities of the Advocate.* I acted as lead counsel for the Plaintiffs in this case. I have practiced law continuously since 2009. I am a member of the State Bar of Nevada (2010 Admission), the Utah State Bar (2009 Admission), and the Washington State Bar (2017 Admission) and I am authorized to practice law in the respective state and federal courts. I am also admitted to practice before the United States Supreme Court and Ninth Circuit Court of Appeals. I directly and actively participate in litigation and appeals before these courts, including business litigation, property encumbrance and lien enforcement and defense, prosecuting claims under the Employee Retirement Income Security Act (ERISA) on behalf of multiemployer health, welfare, and pension plans, apprenticeship-training trust funds, labor management committees, and certain union locals, and representation of creditors in bankruptcy matters. Kevin B. Christensen, Esq., also performed work on this case and is a shareholder with 37 years of legal practice in Nevada. In addition, Laura J. Wolff, Esq, is a well-qualified associate attorney with 14 years of experience, and also helped with preparing the pleadings and papers in this matter. All attorneys are billed at the same rate to this client.

b. *The Nature of the Work Performed.* The Plaintiffs filed this lawsuit after approaching the Lytle Trust on several occasions requesting that the Abstracts of Judgment be expunged from their properties. The Lytle Trust refused in each instance, requiring the Plaintiffs to file this lawsuit and proceed with this litigation, the appeals, and the subsequent effort to remedy the Lytle Trust's violation and contempt of this Court's Orders. The Plaintiffs would not

1 have been required to incur the legal fees and costs requested herein but for the Lytle Trust's
2 actions and refusals to take reasonable steps to avoid litigation.

3 This lawsuit involved a complex procedural history, not only with the Lamothe and
4 Boulden litigation, but with several previous cases between the Lytle Trust and the Association
5 that ultimately gave rise to the Abstracts of Judgment. This procedural history had a direct and
6 substantial impact on the course and outcome of this case. The lawsuit involved questions of law
7 surrounding Nevada's Common Interest Community Act, NRS 116, the validity of the Original
8 CC&Rs and the Amended CC&Rs, and now the meaning of this Court's Orders, creditor rights,
9 and receiverships. These questions of law were complex and novel in that the Lytle Trust had
10 taken actions, both procedural and legally, that were highly unusual and complicated. This case
11 has been very important to the Plaintiffs because it has impacted their residential properties. The
12 stakes were high for the Plaintiffs because these properties are their primary residences. Thus, it
13 was imperative that the Plaintiffs restrain the Lytle Trust from violating this Court's May 2018
14 Order and protect themselves from the Lytle Trust's actions.
15

16
17 c. *The Work Performed.* The Lytle Trusts' actions resulted in time, energy
18 and effort expended by the Plaintiffs' attorneys. The work actually performed required much
19 skill and attention. Since May 23, 2018, the Plaintiffs have been required to respond to a Motion
20 to Stay, Motion for Reconsideration, and two (2) appeal briefs. Plaintiffs also had to monitor
21 motion activity related to the other parties to the case (Boulden, Lamothe, Dismans). Plaintiffs
22 were required to file the Motion for Order to Show Cause and Motion for Release of Bond. The
23 Plaintiffs were also required to file several Motions in the Receivership Case, including a Motion
24 to Intervene and a Countermotion to the Receiver's Request for Instructions. The Motion to Stay,
25 Motion for Reconsideration, Motion for Order to Show Cause and Countermotion all required
26 intensive hearings. Plaintiffs also had to attend various status hearings and hearings related to the
27
28

1 other parties. Much time has been required to look into the facts and circumstances of the three
2 (3) prior cases (Rosemere Litigation I, II and III) filed by the Lytle Trust against the Association,
3 as well as the history of the Lamothe and Boulden case, and the Receivership Action. In
4 addition, though the Appeal was consolidated, it included extensive briefing to defend the May
5 2018 Order and First Fees Order.

6 In its pleadings, the Lytle Trust alleged facts and legal arguments that required significant
7 research and analysis. Although favorable Orders had already been issued, the Plaintiffs had to
8 verify and vet the legal conclusions and evaluate the viability of the Defendants' arguments. The
9 Plaintiffs provided complete and thorough written and oral argument to this Court, the
10 Receivership Court and the Nevada Supreme Court that justified the relief requested in the May
11 2018 Order and the First Fees Order.

12
13 d. *The Result Obtained.* As this Court is aware, the result obtained has been
14 favorable for the Plaintiffs at every stage of this case. Since May 23, 2018, they have prevailed
15 upon the consolidated appeals and the Contempt Order. The Judge in the Receivership Case has
16 not yet issued her opinion but the Plaintiffs believe it will be in line with this Court's opinion.
17 Plaintiffs have derived a great benefit by having the Rosemere Judgments removed from their
18 Properties and from the Contempt Order. The Lytle Trust has been restrained from interfering
19 with their property rights according to the permanent injunction issued by this Court. This result
20 has achieved the purpose of this lawsuit..

21
22 e. *The Hourly Rates Charged and Amount of Time Spent are Reasonable.* The law
23 firm's hourly rates of \$260.00 per hour are reasonable. *See Chemeon Surface Tech., LLC v.*
24 *Metalast Int'l, Inc.*, No. 3:15-CV-00294-MMD-VPC, 2017 WL 2434296, at *1 (D. Nev. June 5,
25 2017) (surveying cases for market rates and finding reasonable \$375 for a partner, \$250 for an
26 associate, and \$125 for a paralegal); *John Bryant Lawson v. William M. Lawson, Jr.*, No. 3:14-

1 CV-00345-WGC, 2016 WL 1171010, at *4 (D. Nev. Mar. 24, 2016) (finding \$275.00 per hour
2 for an attorney with 10 years of experience, \$325.00 per hour for an attorney with 12 years of
3 experience, \$235.00 per hour for a first year associate, and \$175.00 per hour for a paralegal
4 reasonable market rates). Moreover, the Nevada Supreme Court upheld a \$250.00 per hour rate
5 as reasonable 11 years ago. *See Cuzze v. Univ. & Cmty. Coll. Sys. of Nevada*, 123 Nev. 598, 607,
6 172 P.3d 131, 137 (2007). This Court recently awarded fees in this Case to Boulden and
7 Lamothe with an hourly rate of \$400. Therefore, the hourly rate of \$260.00 would also be
8 considered reasonable considering the experience and skill of Plaintiffs' counsel. The hours
9 expended are reasonable and justified because they reflect detailed and accurate work.
10

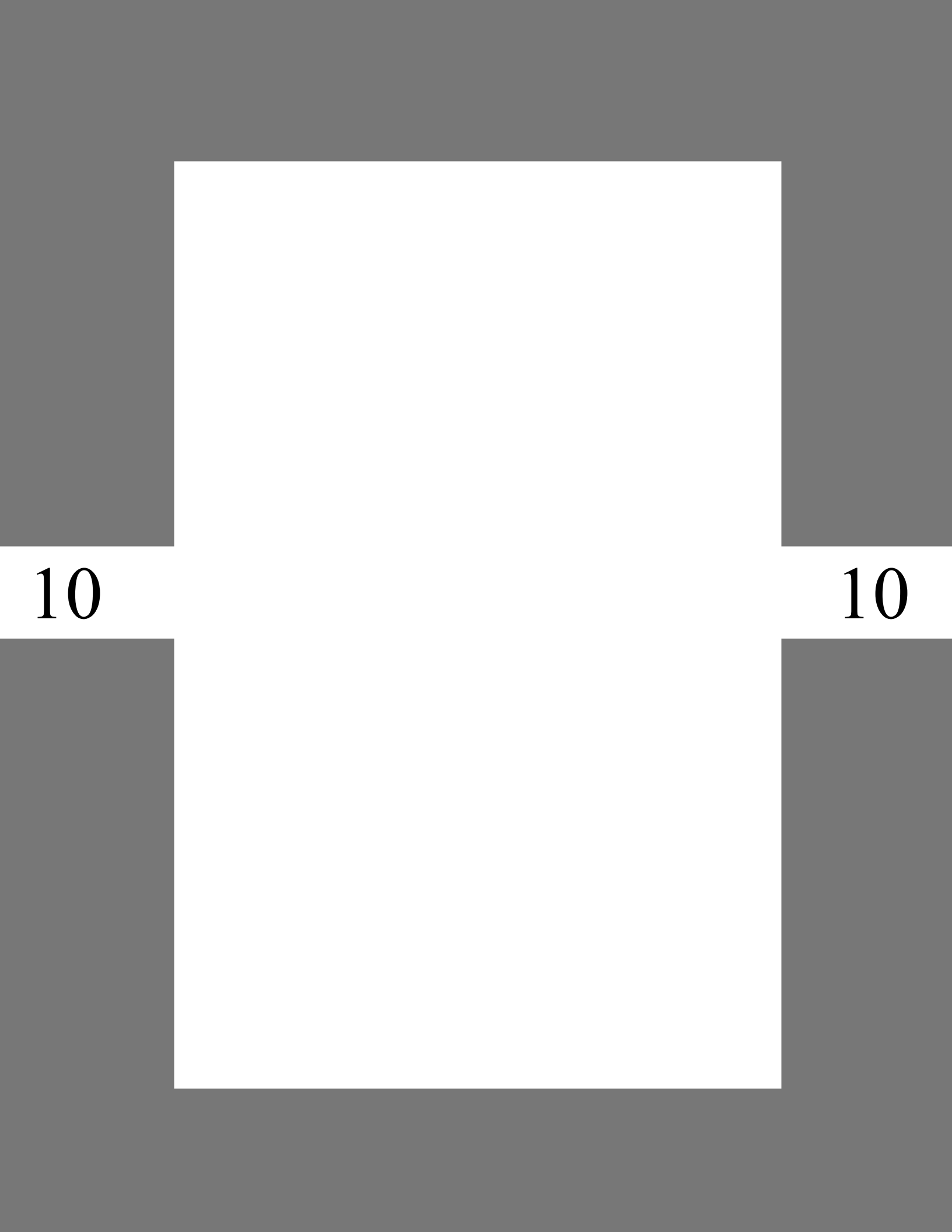
11 14. I submit that the attorney's fees and costs were actually and necessarily incurred
12 and are reasonable.

13 15. To my knowledge, Trudi Lee Lytle and John Allen Lytle, as Trustees of the Lytle
14 Trust, are not minors, incompetents or in the military service, or otherwise exempted under the
15 Servicemembers' Civil Relief Act, 50 U.S.C. § 501, et seq.
16

17 Further your affiant sayeth naught.

18 DATED this 26th day of May, 2020.

19 /s/ Wesley J. Smith
20 Wesley J. Smith, Esq.
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10

10

MEMO
CHRISTENSEN JAMES & MARTIN
KEVIN B. CHRISTENSEN, ESQ. (175)
WESLEY J. SMITH, ESQ. (11871)
LAURA J. WOLFF, ESQ. (6869)
7440 W. Sahara Avenue
Las Vegas, Nevada 89117
Tel.: (702) 255-1718
Facsimile: (702) 255-0871
Email: kbc@cjmlv.com; wes@cjmlv.com; ljw@cjmlv.com
*Attorneys for September Trust, Zobrist Trust, Sandoval Trust,
and Dennis & Julie Gegen*

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

MARJORIE B. BOULDEN, TRUSTEE OF
THE MARJORIE B. BOULDEN TRUST, *et*
al.,

Plaintiffs,

vs.

TRUDI LEE LYTLE, *et al.*,

Defendants.

Case No.: A-16-747800-C
Dept. No.: XVI

**MEMORANDUM OF COSTS AND
DISBURSEMENTS**

SEPTEMBER TRUST, DATED MARCH 23,
1972, *et al.*,

Plaintiffs,

vs.

TRUDI LEE LYTLE AND JOHN ALLEN
LYTLE, AS TRUSTEES OF THE LYTLE
TRUST, *et al.*,

Defendants.

Case No.: A-17-765372-C
Dept. No.: XVI

Consolidated

MEMORANDUM OF COSTS AND DISBURSEMENTS

Court Download Document Fee \$ 185.00
Parking Fee \$ 12.00
Court Filing Fees \$ 416.64
Westlaw Research Fees \$2,981.88

1 Court Call Appearance Fee.\$ 51.00
2 Reporter's Transcript Fee on Appeal\$443.56
3 Recordation Fee\$ 50.00
4 Certified Copy Fee\$ 5.00
5 Total from May 23, 2018 through April 30, 2020\$4,145.08

6 STATE OF NEVADA)
7 :ss.
8 COUNTY OF CLARK)

9 WESLEY J. SMITH, ESQ., being duly sworn, states:

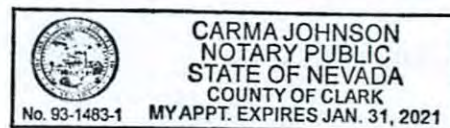
- 10 1. That affiant is the attorney for Plaintiffs and has personal knowledge of the above
11 costs and disbursements expended; that the items contained in the above
12 memorandum are true and correct to the best of this affiant's knowledge and belief;
13 and that the said disbursements have been necessarily incurred in this action.
14 2. That said Plaintiffs are submitting this Verified Memorandum of Costs and
15 Disbursements in conjunction with Plaintiffs' Motion for Attorney's Fees and Costs.
16 3. Attached to the Motion as Exhibits 6A, 6B, 6C, and 6D are copies of Christensen
17 James & Martin's Billing Statements to each of the Plaintiffs evidencing all of the
18 costs.
19 4. Further your Affiant sayeth naught.

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

22 By: Wesley J. Smith
23 Wesley J. Smith, Esq.

24 SUBSCRIBED AND SWORN to before me this
25 26 day of May, 2020.

26 Carma Johnson
27 Notary Public
28



CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On May 26, 2020, I caused a true and correct copy of the foregoing Memorandum of Costs and Disbursements, to be served in the following manner:

☒ **ELECTRONIC SERVICE:** electronic transmission (E-Service) through the Court's electronic filing system pursuant to Rule 8.05 of the Rules of Practice for the Eighth Judicial District Court of the State of Nevada.

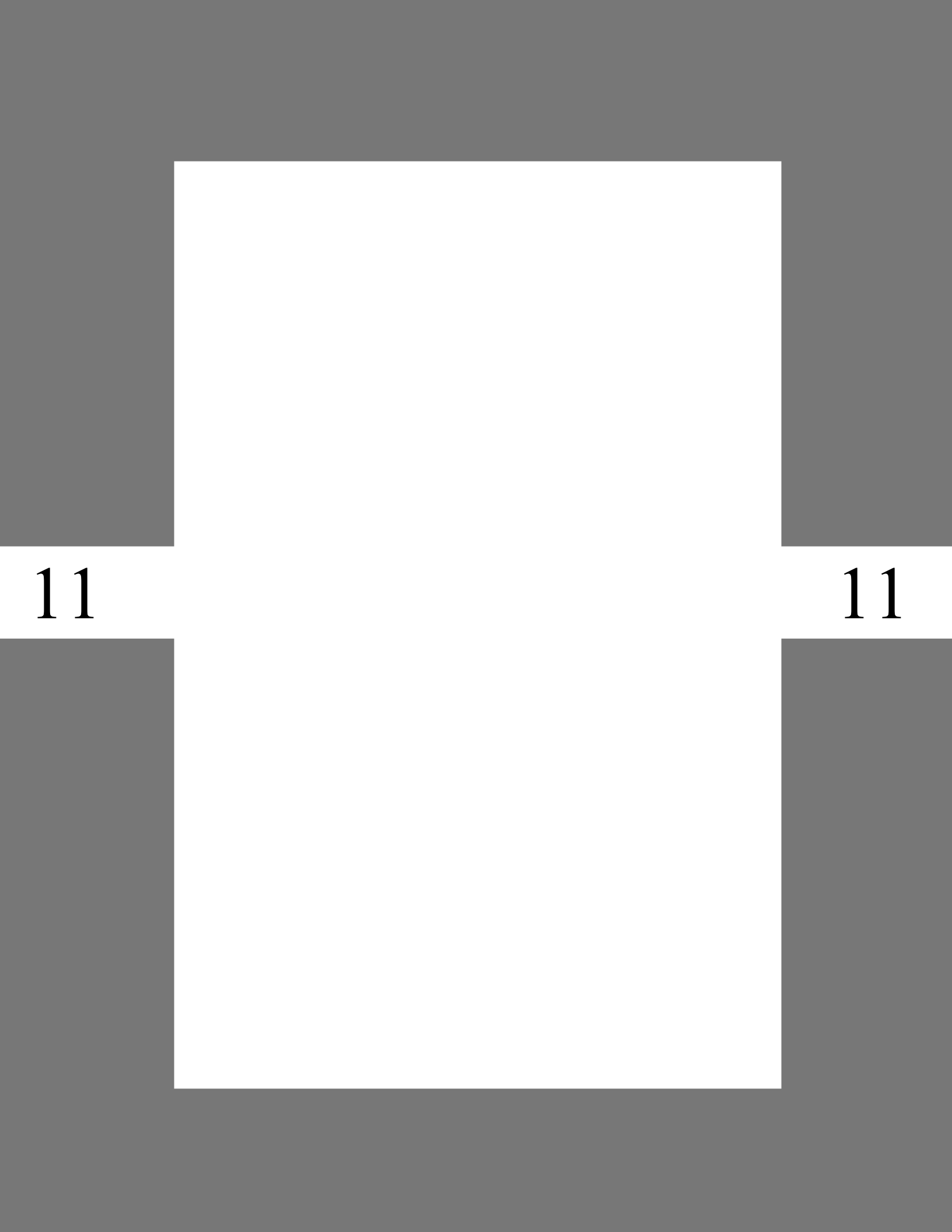
Liz Gould (liz@foleyoakes.com)
 Daniel Foley (Dan@foleyoakes.com)
 Maren Foley (maren@foleyoakes.com)
 Jennifer Martinez (jennifer.martinez@fnf.com)
 Christina Wang (christina.wang@fnf.com)
 Mia Hurtado (mia.hurtado@fnf.com)
 Richard E. Haskin, Esq. (rhaskin@gibbsgiden.com)
 Robin Jackson (rjackson@gibbsgiden.com)
 Shara Berry (sberry@gibbsgiden.com)
 Daniel Hansen (dhansen@gibbsgiden.com)
 Joel D. Henriod (JHenriod@LRRC.com)
 Daniel F. Polsenberg (DPolsenberg@LRRC.com)
 Dan R. Waite (DWaite@LRRC.com)

☐ **UNITED STATES MAIL:** depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address(es):

☐ **FACSIMILE:** By sending the above-referenced document via facsimile as follows:

☐ **E-MAIL:** electronic transmission by email to the following address(es):

/s/ Natalie Saville
 Natalie Saville



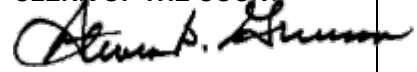
11

11

6/9/2020 4:18 PM

Steven D. Grierson

CLERK OF THE COURT

**OPP**

DAN R. WAITE, ESQ.

Nevada Bar No. 4078

DWaite@lrrc.com

LEWIS ROCA ROTHGERBER CHRISTIE LLP

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Telephone: 702-949-8200

Facsimile: 702-949-8398

*Attorneys for Defendants***DISTRICT COURT
CLARK COUNTY, NEVADA**MARJORIE B. BOULDEN, TRUSTEE OF
THE MARJORIE B. BOULDEN TRUST,
LINDA LAMOTHE AND JACQUES
LAMOTHE, TRUSTEES OF THE
JACQUES & LINDA LAMOTHE LIVING
TRUST,

Plaintiffs,

vs.

TRUDI LEE LYTLE, JOHN ALLEN
LYTLE, THE LYTLE TRUST, DOES I
through X, and ROE CORPORATIONS I
through X,

Defendants.

Case No.: A-16-747800-C

Dept. No.: XVI

**DEFENDANT LYTLE TRUST'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR ATTORNEY'S
FEES AND COSTS****DATE OF HEARING: JULY 7, 2020****TIME OF HEARING: 9:00 A.M.**SEPTEMBER TRUST, DATED MARCH
23, 1972; GERRY R. ZOBRIST AND
JOLIN G. ZOBRIST, AS TRUSTEES OF
THE GERRY R. ZOBRIST AND JOLIN G.
ZOBRIST FAMILY TRUST; RAYNALDO
G. SANDOVAL AND JULIE MARIE
SANDOVAL GEGEN, AS TRUSTEES OF
THE RAYNALDO G. AND EVELYN A.
SANDOVAL JOINT LIVING AND

Case No.: A-17-765372-C

Dept. No.: XVI

CONSOLIDATED

DEVOLUTION TRUST DATED MAY 27,
1992; and DENNIS A. GEGEN AND
JULIE S. GEGEN, HUSBAND AND
WIFE, AS JOINT TENANTS,

Plaintiffs,

vs.

TRUDI LEE LYTLE AND JOHN ALLEN
LYTLE, AS TRUSTEES OF THE LYTLE
TRUST; JOHN DOES I through V; and
ROE ENTITIES I through V, inclusive,

Defendants.

LEGAL ARGUMENT

I. THIS COURT CANNOT AWARD FEES PLAINTIFFS INCURRED IN JUDGE KISHNER'S RECEIVERSHIP ACTION

A. Plaintiffs Cite No Authority For Awarding Fees Incurred in a Separate Action

Plaintiffs seek not only post-judgment fees/costs incurred in this action but also pre-judgment fees/costs incurred in Case No. A-18-775843-C currently pending before Judge J. Kushner (the "Receivership Action"). Indeed, Plaintiffs seek an award of \$39,769.00 in fees for efforts associated with the Receivership Action.¹

However, "Plaintiff provides no authority for the proposition that this Court is authorized to award fees and costs incurred in a separate state court action." *MacLean Townhomes, LLC v. Charter Oak Fire Insur. Co.*, 2009 WL 734693, *3 (W.D. Wash. 2009). Indeed, "[a]n attorney's fee must be sought in the action in which it is incurred" *Lupoli v. Venus Laboratories, Inc.*, 731 N.Y.S.2d 217, 218 (N.Y. Sup. Ct. App. Div. 2001).

The Receivership Action is still pending—i.e., Plaintiffs are not *prevailing* parties there; indeed, they are "parties" there only by way of intervention. Thus, any current request for fees associated with the Receivership Action is premature. And,

¹ Plaintiffs' counsel's block billing makes it impossible to determine with precision how much of the present request relates solely to the Receivership Action. Attached hereto as Ex. A is the highlighted entries the Lytle Trust included in its calculation of \$39,760.

even if Judge Kishner vacates her Order Appointing Receiver, any request for fees and costs associated with efforts in that action must be sought from Judge Kishner.

In short, \$39,769.00 of Plaintiffs' request for fees should be denied without prejudice. By denying the request without prejudice, Plaintiffs can raise this issue in the Receivership Action with Judge Kishner if/when they prevail there.

B. Pursuant to the Express Terms of the Original CC&Rs, Plaintiffs' Request for Fees Incurred in the Receivership Action can be Awarded Only by the Receivership Court

Plaintiffs devote much attention to the Original CC&Rs (Section 25) as a basis for awarding their fees. Plaintiffs rely on a basic tenant of contract enforcement, i.e., that if "the language is clear and unambiguous; . . . *the contract will be enforced as written.*" (Mtn. at 17:21-22, citing *Ellison v. C.S.A.A.*, 106 Nev. 601, 6j03, 797 P.2d 975, 977 (1990) (emphases added)). Plaintiffs suggest "[t]he language in the Original CC&Rs is clear." (Mtn. at 17:23).

However, Plaintiffs then disregard that clear language as it relates to the fees they incurred in the separate Receivership Action. More specifically, the applicable attorney fee provision (Section 25 of the Original CC&Rs) expressly provides: "In any legal or equitable proceeding . . . , the losing party or parties shall pay in such amount *as may be fixed by the court in such proceeding.*" (Mtn. at Ex. 7, Sect. 25, emphases added). Thus, fees for the Receivership Action can only be fixed by the Receivership judge "in such proceeding," not remotely by another judge "for such proceeding."

The billing statements attached hereto as Ex. A highlight \$39,769.00 in fees incurred by Plaintiffs' counsel pursuing matters in the Receivership Action. Pursuant to the express terms of the CC&Rs, that entire amount must be denied without prejudice to Plaintiffs' right to seek such from Judge Kishner in the Receivership Action. *See J&B Investments, LLC v. Surti*, 258 S.W.3d 127, 138 (Tenn. Ct. App. 2007) ("The entitlement to recover attorney's fees . . . is limited to the situation agreed to by the parties in the contract, and the fee provision is subject to the rules of contract interpretation.").

1 **C. Substantial Fees Incurred in the Receivership Action Were Not**
2 **Necessary**

3 Even if this Court were to consider awarding fees to Plaintiffs for their efforts
4 in the separate Receivership Action, the Court should not award all their fees there
5 because a substantial portion were not necessary. *See Harvey v. United Pacific*
6 *Insur. Co.*, 109 Nev. 621, 625, 856 P.2d 240, 242 (1993) (court must find that fees
7 were reasonable and necessary). More specifically, Plaintiffs spent a considerable
8 amount of time preparing (and then filing) a Motion to Intervene into the
9 Receivership Action without even a phone call to ascertain if the parties would
10 stipulate to the intervention. Once the undersigned contacted Plaintiffs' counsel
11 after the Motion to Intervene was filed and offered to stipulate to Plaintiffs'
12 intervention into the Receivership Action, Plaintiffs strangely rebuffed the offer until
13 pressed by the Receivership Court (Judge Kishner) at a status hearing attended by
14 Plaintiffs' counsel.

15 The more specific curious facts are as follows: Plaintiffs filed their Motion to
16 Intervene in the Receivership Action on March 4, 2020. On March 6, 2020, the
17 undersigned sent an email to Plaintiffs' counsel indicating that "the Lytle Trust
18 welcomes your participation in the Receivership action" and that "the Lytle Trust is
19 willing to stipulate to your intervention, and then you can proceed to file your
20 referenced motion to amend or set aside the Receivership Order." (Email (3/6/20) at
21 4:23 pm, attached hereto as Ex. B.) Since the Lytle Trust was willing to stipulate to
22 the very relief Plaintiffs' sought in their Motion to Intervene, the undersigned's
23 March 6 email included a draft Stipulation and Order. (*Id.*)

24 Plaintiffs did not welcome or accept the stipulation. Instead, the billing
25 statements reveal that Plaintiffs' counsel held internal conferences about the
26 stipulation (even though, again, the offered stipulation gave them 100% of the relief
27 they sought in the Motion to Intervene). (*See Mtn. at Ex. 6, at entries for 3/6/20*). No
28 doubt, Plaintiffs spent a tremendous amount of time on the Motion to Intervene;

1 however, the majority of time was not spent on the uncontroversial and established
2 law, but rather on a very extensive statement of facts, which was designed to poison
3 Judge Kishner. Accepting the Lytle Trust's stipulation would deny Plaintiffs the
4 opportunity to emotionally bias Judge Kishner against the Lytle Trust.

5 On March 9, 2020, the undersigned and Plaintiffs' counsel (Wes Smith) spoke
6 on the phone about the stipulation. During that conversation, Mr. Smith indicated
7 he would like a copy of the proposed stipulation in Word so he could redline some
8 changes, including recitations of the reasons why Plaintiffs felt the need to intervene
9 into the Receivership Action. Accordingly, still on March 9, the undersigned
10 transmitted the draft Stipulation and Order in Word to Mr. Smith by email, which
11 included the following:

12 Because I'm aware of the emotional aspects of this case between
13 our respective clients, I purposely tried to avoid such by drafting the
14 Stip in a very short, matter-of-fact sort of way (i.e., intentionally non-
15 emotional). So, as you suggest changes to the draft I would
16 respectfully ask that you keep such in mind. In other words, I'm not
17 sure the reasons why you want to intervene are necessary to a
18 Stipulation agreeing to the intervention (e.g., depending on what you
19 want to recite in the Stipulation may necessitate rebuttal recitations
20 from the Lytle Trust; effectively turning the Stip into a mini-motion
21 and opposition, which I think is what we want to avoid). My hope is
22 to keep this simple and 'vanilla' and then you can frame all the issues
23 and allegations in your anticipated motion to revise/set aside the
24 Receiver Order.

25 (Ex. C at email (3/9/20) at 10:11 am).

26 Plaintiffs' counsel held more internal conferences about the proposed
27 stipulation to Intervene. (Mtn. at Ex. 6, entries for 3/10/20). Stated differently,
28 instead of immediately snatching up the Lytle Trust's offer to give Plaintiffs the full
relief requested in their motion, the Plaintiffs prolonged the matter and even held
internal conferences at the combined rate of \$520 per hour (or \$780 per hour if three
attorneys were involved), which they now want the Lytle Trust to reimburse them
for. To emphasize this point, the Plaintiffs spent significant sums of money
preparing a motion they did not need to file (all they had to do was ask for a
stipulation to intervene, as evidenced by the Lytle Trust's immediate response

1 welcoming Plaintiffs into the Receivership Action and offering to stipulate to the
 2 requested relief), and then once the Lytle Trust offered to give Plaintiffs exactly
 3 what they asked for, rather than avoiding further fees on the non-issue, Plaintiffs
 4 incurred even more fees thinking about it.

5 Apparently, Plaintiffs' primary motive in filing the Motion to Intervene was
 6 NOT to intervene (as offered in the stipulation) but to bias Judge Kushner because
 7 later that same day (March 10), Plaintiffs' counsel responded indicating "we do not
 8 believe we are going to be able to stipulate on this issue" because "[w]e believe that
 9 the reasons set forth in our motion warranting intervention need to be heard by
 10 [Judge Kushner] now. Since the only thing we really agree on is that intervention
 11 should be granted, then it is probably best addressed through a limited opposition."
 12 (*See* Ex. D at email (3/10/20) at 11:02 am).

13 The undersigned responded:

14 I'm trying to figure out why you or I or the Court need to waste
 15 any time on the intervention issue when we are willing to stipulate to
 16 the relief you're requesting. . . . [N]ot stipulating now will both
 17 multiply the proceedings (and related expenses for all involved) and
 18 actually delay the Court's resolution of your underlying concerns
 19 (because, if we stipulate now, you could file your motion to amend/set
 20 aside the Receiver order tomorrow whereas if we don't stipulate, the
 21 earliest you'll be able to file is after the April 7th hearing). . . . As
 22 mentioned yesterday, I'm interested in having the Court resolve your
 23 concerns as quickly as possible (albeit, we want the Court to resolve
 24 those concerns differently).

20 (Ex. E at email (3/10/20) at 11:24 am, emphasis in original).

21 Plaintiffs' counsel responded later that same day (March 10) with a
 22 substantially revised draft Stipulation and Order that included far reaching and
 23 highly disputed allegations, ensuring it would not be accepted. (*See* Ex. F at email
 24 (3/10/20) at 12:43 pm).

25 Counsel engaged in some follow-up communications but agreement was not
 26 reached. On March 12, 2020, Judge Kushner held a status hearing (primarily to
 27 receive a report from the Receiver). Plaintiffs' counsel (Wes Smith) participated in
 28 the hearing. During the status hearing, Plaintiffs' proposed intervention was briefly

discussed and the Lytle Trust's (and Receiver's) willingness to stipulate to such. Although Plaintiffs' counsel tried to convey the reasons for the intervention, Judge Kishner did not want to hear those reasons (she generally understood that Plaintiffs alleged the Lytle Trust failed to disclose all relevant facts to her, but she did not want to hear the details until substantive motions were filed). Upon ascertaining that the Lytle Trust was willing (indeed, had been trying unsuccessfully) to stipulate to Plaintiffs' intervention, Judge Kishner advanced the hearing on Plaintiffs' Motion to Intervene and granted such. The parties signed the latest version of the Stipulation and Order brought to Court by the undersigned (that contained none of the poisonous allegations Plaintiffs tried to include) and Judge Kishner signed the Order in open court.

In short, Plaintiffs needlessly incurred thousands of dollars preparing a motion that could and should have been completely avoided had they simply picked up the phone and asked if the Lytle Trust would stipulate to their intervention. As the foregoing demonstrates, the Lytle Trust was not antagonistic to Plaintiffs' participation; to the contrary, "the Lytle Trust welcomes your participation in the Receivership action." (Ex. B). Thus, while resolution of the request for fees regarding all efforts in the Receivership Action must be resolved by the Receivership Court (Judge Kishner), if this Court disagrees and reaches the merits of the request, the Court should nevertheless disallow almost all fees associated with the Motion to Intervene and resulting Stipulation and Order. Spending nearly \$10,000 on a stipulated procedure (intervention) was neither reasonable nor necessary.²

² At a minimum, 100% of Laura Wolff's time entries (entered on the billing statements as "LJW") for 2/14/20 ("Preparation of Motion to Intervene" for \$1,066.00), 2/18/20 ("Preparation of Motion to Intervene; preparation of Affidavits" for \$650.00), 2/19/20 ("Preparation of Motion to Intervene; preparation of Affidavits" for \$832.00); 2/21/20 ("Preparation of Motion to Intervene" for \$572.00), 2/22/20 ("Preparation of Motion to Intervene" for \$468.00), 2/24/20 ("Preparation of Motion to Intervene" for \$754.00), 2/25/20 ("Preparation of Motion to Intervene" for \$468.00), 2/26/20 ("Preparation of Motion to Intervene" for \$546.00), should be disallowed. This amounts to \$5,356.00

Additionally, part or all of Wes Smith's block-billed time entries for 3/2/20 ("Review and revise Motion to Intervene" for a total of \$1,560.00), 3/3/20 ("revise Motions" for a total of \$728.00), 3/4/20 ("revisions to Motions" for a total of \$676.00), and numerous entries between 3/6/20 and 3/12/20 regarding the Stipulation to Intervene offered by the Lytle Trust should be disallowed. This amounts to a total combined amount of \$4,667.00.

II. PLAINTIFFS ARE NOT ENTITLED TO ATTORNEY'S FEES PURSUANT TO THE TERMS OF THE ORIGINAL CC&RS BECAUSE PLAINTIFFS NEITHER SOUGHT TO ENFORCE A PROVISION OF THE ORIGINAL CC&RS NOR TO RESTRAIN A VIOLATION THEREOF

Plaintiffs correctly note that “[t]he First Fees Order did not reach alternative grounds for an award of fees, such as the Original CC&Rs, which had been argued by the Plaintiffs.” (Mtn. at 6:18-19). Indeed, this Court previously awarded fees to Plaintiffs solely on the basis of NRS 18 and the Nevada Supreme Court affirmed such only on the basis of NRS 18. While Plaintiffs note this Court awarded fees to the Lamothe/Boulden parties and to the Dismans under Section 25 of the Original CC&Rs, the claims involved in that lead case (A-16-747800-C) are different than those asserted here in the consolidated case (A-17-765372).

More specifically, in awarding fees to the Disman and Lamothe/Boulden parties in the lead case, the Court relied heavily on the fact that the Lytle Trust asserted *counterclaims under the Original CC&Rs*.³ However, no such counterclaims were asserted against Plaintiffs here in the consolidated.

Further, Plaintiffs themselves did not attempt to enforce the provisions of the Original CC&Rs. Tellingly, the original pre-lawsuit demand letter Plaintiffs sent to the Lytle Trust and that Plaintiffs rely upon so heavily as evidence that they should not have been required to bring this action (*see* Mtn. at Ex. 3) fails to mention the Original CC&Rs. This Court’s First Fee Order in favor of Plaintiffs

³ Combined, no less than \$10,023.00 should be disallowed related to the Receivership Action.

See e.g., Order awarding **Disman** fees (9/6/19) at Conclusion No. 3 (“The Lytle Trust brought the Counterclaim against the Dismans *seeking to enforce, among other things, its alleged rights under the Original CC&Rs* against them.”) (emphasis added) and Conclusion No. 4 (“Given the nature of the Counterclaim, as well as the overall case in which both the Boulden Plaintiffs and the Lytle Trust sought to enforce their alleged rights under the Original CC&Rs, this Court concludes that Section 25 of the Original CC&Rs applies to control the award of attorney’s fees.”) (emphasis added).

See e.g., Order awarding **Lamothe/Boulden** fees (9/20/19) at Finding No. 16 (“...the Lytle Trust filed . . . its Counter Complaint against the Plaintiffs and specifically alleged that *based on the Original CC&Rs*, the Lytle Trust was entitled to record the Abstracts of Judgment against the Plaintiffs’ properties.”) (emphasis added), Finding No. 20 (“The Plaintiffs’ Amended Complaint and the Lytle Trust’s Counter Complaint were both *based in large part on the parties’ rights under the Original CC&Rs . . .*”) (emphasis added), and Finding No. 22 (“The Lytle Trust, in this litigation, sought to enforce alleged rights *under the Original CC&Rs . . .*”) (emphasis added).

1 does not mention the Original CC&Rs (or any other CC&Rs)—not once. Later,
 2 when the Nevada Supreme Court issued its First Order of Affirmance regarding
 3 the Lamothe/Boulden parties, Plaintiffs sent another demand letter to the Lytle
 4 Trust. *See* Mtn. at Ex. 4. But, it too fails to mention the Original CC&Rs

5 Plaintiffs' new characterization that this case was about the Original
 6 CC&Rs is an after-thought effort to shoehorn this case into the attorney fee
 7 provision found in the Original CC&Rs. However, had the enforcement or
 8 interpretation of the Original CC&Rs been at issue in Plaintiffs' claims, they
 9 would have been required to seek mandatory alternative dispute resolution
 10 pursuant to NRS 116.4117 and NRS 38.310. NRS 38.310 provides as follows:

11 1. No civil action based upon a claim relating to:

12 (a) The interpretation, application or enforcement of any
 13 covenants, conditions or restrictions applicable to residential
 14 property . . . may be commenced in any court in this State **unless**
 15 **the action has been submitted to mediation** or, if the
 16 parties agree, has been referred to a program pursuant to the
 17 provisions of NRS 38.300 to 38.360, inclusive (Emphases
 18 added).

19 In the present case, Plaintiffs filed their Complaint without undertaking the
 20 Chapter 38 mediation. This mediation was required had Plaintiffs filed an action
 21 relating to the "interpretation, application or enforcement of" the Original CC&Rs.
 22 This was not an oversight—it is an admission that this case was never one to
 23 enforce or restrain anything found in the Original CC&Rs.

24 Given the foregoing, the Original CC&Rs do not apply and indeed preclude an
 25 award of fees here. The Original CC&Rs provide as follows:

26 In any legal or equitable proceeding for the enforcement of
 27 or to restrain the violation of the Declaration of Covenants,
 28 Conditions and Restrictions or any provision thereof, the
 losing party or parties shall pay in such amount as may
 be fixed by the court in such proceeding.

Quite simply, Plaintiffs did not seek to either enforce or restrain a violation of
 any provision of the Original CC&Rs. However, now realizing and even admitting
 that NRS 18.010 "does not authorize an award of appellate attorney fees" (Mtn. at

16:25-17:1)—i.e., unlike in the First Fee Order, NRS 18.010 provides no basis to receive an award of Plaintiffs’ fees incurred on appeal—Plaintiffs are forced to recast this case by not just suggesting it had some nexus to the Original CC&Rs, but that this case was “all about the Plaintiffs enforcing the Original CC&Rs.” (Mtn. at 14:16-17).⁴ Plaintiffs support their revisionist history by referring to matters raised in an entirely different action—the Receivership Action. (Mtn. at 14:17-19 (“The Lytle Trust proffered both the Original CC&R’s and the . . . Amended CC&R’s in . . . the Receivership Action,” 22-23 (“all actions in the Receivership Court were in restraint of the Original CC&Rs”). The subject matter of a different lawsuit cannot form the basis of an award of fees here.

The Plaintiffs also suggest this case was “all about the Plaintiffs enforcing the Original CC&R’s” because they “restrained the Lytle Trust’s violation of the Original CC&Rs by requiring the Lytle Trust to expunge the Abstracts of Judgment recorded against their properties in violation of the Original CC&Rs” (Mtn. at 14:19-21). However, recording the Abstracts of Judgment was not a violation of the Original CC&Rs; instead, as this Court and the Nevada Supreme Court found, recording the Abstracts (1) simply was not supported by NRS Chapter 116 (more particularly, NRS 116.3117) as the Lytle Trust had claimed, and (2) violated due process since Plaintiffs were not judgment debtors and were not even parties to the actions giving rise to the Lytle Trust’s judgments. Plaintiffs do not (and cannot) cite a single Original CC&R provision that precluded recording the Abstracts of Judgment. Hypothetically, if the Abstracts recorded against the Plaintiffs’ properties arose from a personal injury judgment against the Association in favor of a visiting guest (e.g., a guest injured by the entrance gate), it would be frivolous to even suggest that recording the Abstracts constituted a violation of any Original CC&R provision because the injured plaintiff

⁴ That Plaintiffs did not even attempt to satisfy NRS 38.310’s mandatory ADR obligation strongly refutes Plaintiffs’ self-serving claim now that this case was “all about” enforcing the Original CC&Rs. Indeed, if true that this case is “all about” enforcing the Original CC&Rs (it’s not), Plaintiffs should not be awarded ANY fees on the alternative basis that all fees might have been avoided had Plaintiffs complied with their statutory obligation to engage in mediation.

1 is not an Association member, and therefore not bound by the Original CC&Rs. In
2 the hypothetical, recording the Abstract against the individual homeowners'
3 properties would be improper but not because the Original CC&Rs precluded such
4 (they don't). That the Lytle Trust happens to be an Association member does not
5 convert Plaintiffs' action to expunge the Abstracts to one arising under the Original
6 CC&Rs. In both this case and the hypothetical, the Abstracts must be expunged
7 because (1) the individual homeowners were not parties to the actions, and (2) NRS
8 116.3117 does not apply to otherwise allow a judgment against an Association to be a
9 lien against an Association member's property.

10 To be entitled to fees under the Original CC&Rs, Plaintiffs must have either
11 sought to enforce the Original CC&Rs or to restrain a violation of the Original
12 CC&Rs. The Original CC&Rs are only 25 paragraphs long. Again, Plaintiffs do not
13 cite any specific paragraph/term they sought to enforce or restrain in this action.
14 Stated differently, Plaintiffs ask this Court to award more than \$150,000 in fees
15 under paragraph 25 of the Original CC&Rs but fail to specifically identify a single
16 provision found in the Original CC&Rs that they sought to enforce or restrain.
17 Instead, they argue in *ipse dixit* fashion (i.e., it is because I say it is) that "[t]his case
18 was all about the Plaintiffs enforcing the Original CC&Rs after the Lytle Trust
19 violated or ignored the Original CC&Rs." (Mtn. at 14:16-17). Certainly, for more
20 than \$150,000, the Lytle Trust can expect to be advised regarding what specific
21 provision within the Original CC&Rs the Plaintiffs sought to enforce or restrain here.
22 Plaintiffs do not even attempt to cite a provision.

23 Finally, to the extent Plaintiffs' attempt to base an award of fees on the
24 Lytles' reliance on the Original CC&Rs as a *defense* to Plaintiffs' claims, this also
25 must fail. The "legal...proceeding" here was initiated by Plaintiffs, not the Lytles,
26 and it is the Plaintiffs who must seek to enforce or restrain a violation of a provision
27 of the Original CC&Rs. To ask the necessary rhetorical questions, what provision of
28

1 the Original CC&Rs were Plaintiffs attempting to enforce? What provision of the
2 Original CC&Rs were Plaintiffs seeking to restrain a violation of?

3 In sum, filing the Complaint without first participating in the Chapter 38
4 dispute resolution process is an acknowledgment this was not a legal proceeding to
5 either enforce or restrain a violation of the Original CC&Rs. Plaintiffs fail to
6 identify the provision within the Original CC&Rs they sought to enforce or restrain.
7 As such, an award of fees under paragraph 25 of the Original CC&Rs is not
8 available. And, therefore, Plaintiffs cannot recover any of the fees they claim to
9 have incurred on appeal, as the only colorable basis for fees remains NRS 18. *Bd.*
10 *Of Gallery of History, Inc. v. Datecs Corp.*, 116 Nev. 286, 288, 994 P.2d 1149, 1150
11 (2000) (holding that NRS 18.010(2) does not provide for an award of attorney fees on
12 appeal); *Bobby Berosini, Ltd. V. PETA*, 114 Nev. 1348, 1356-57, 971 P.2d 383, 388
13 (1998) (same).

14 **III. THE LODESTAR CALCULATION REQUIRES A SIGNIFICANT REDUCTION IN THE** 15 **REQUESTED FEES**

16 If the Court does not end the inquiry based on the foregoing and feels the
17 Plaintiffs are entitled to some award of fees, the amount requested by Plaintiffs must
18 be substantially reduced. In non-contingency cases, the “starting point” for
19 determining an award of fees is based on the “lodestar” amount. Then, “the court
20 must continue its analysis by considering the requested amount in light of the
21 [Brunzell] factors. . . .” *Shuette v. Beazer Homes Holding Corp.*, 121 Nev. 837, 864-
22 65, 124 P.3d 530, 549 (2005).

23 “The lodestar approach involves multiplying ‘the number of hours reasonably
24 spent on the case by a reasonable hourly rate.’” *Id.*, 121 Nev. at 865 n.99, 124 P.3d at
25 549 n.99, quoting *Herbst v. Humana Health Insur. Of Nevada*, 105 Nev. 586, 590, 781
26 P.2d 762, 764 (1989)). “[T]o establish that the amount of time expended on a matter
27 is reasonable, the movant can only meet his burden by presenting evidence that is
28

adequate for a court to determine what hours should be included in the award.”

Richrdson v. Tex-Tube Co., 843 F. Supp.2d 699, 707-08 (S.D. Tex. 2012).

Here, many hours were not “reasonably spent” on the case. Some of the problems evidenced here include (1) improper “block billing,” which makes it impossible to determine how much time was spent on a particular task, (2) non-compensable clerical tasks, such as calendaring, (3) duplicative or otherwise needless work, and (4) time entries that are so vaguely described that it is impossible to evaluate whether the efforts were reasonable for this case.

A. Plaintiffs’ Counsel’s “Block Billing” Time Entries Are Not Proper And Require A Significant Reduction

Almost all of Plaintiffs’ counsel’s time entries reflect “block billing,” in which the amount of time spent on each discrete task is not identified. Instead, multiple, undifferentiated tasks are lumped into a single entry or block of billed time.

While block billing is a common practice, it “is at odds with the burden of the party seeking attorneys’ fees to make a *prima facie* case of reasonableness.” *Elderberry of Weber City, LLC v. Living Centers-Southeast, Inc.*, 2014 WL 3900389, at *13 (W.D. Va. 2014). Block billing several tasks makes it “impossible to evaluate their reasonableness.” *Role Models America, Inc. v. Brownlee*, 353 F.3d 962, 971 (D.C. Cir. 2004). Thus, “a party block bills at his own peril.” *U.S. v. NCH Corp.*, 2010 WL 3703756, at *5 (D. N.J. 2010). Courts should not be forced to take a “shot in the dark” and “guess whether the hours expended were reasonable, which is precisely the opposite of the methodical calculations the lodestar method requires.” *Yeager v. Bowlin*, 2010 WL 1689225, at *1 (E.D. Cal. Apr. 26, 2010) (collecting cases). Indeed, where block billing is employed, courts will frequently “exclude such entries from the requested fee award.” *Virgin Diving, LLC v. M/V Alyeska*, 2018 WL 4766993, at *6 (D.V.I. Feb. 5, 2018), *report and recommendation adopted*, 2018 WL 3956403 (D.V.I. Aug. 17, 2018).

Alternatively, the California State Bar's Mandatory Fee Arbitration Committee has concluded that block billing encourages bill padding and "may increase time by 10%-30%." *See* State Bar of Calif. Comm. on Mandatory Fee Arb., Arb. Advisory 03-01 (2003). Thus, when a court does not entirely eliminate all block-billed time entries, courts generally apply a significant reduction for block-billed hours. *See e.g., Monolithic Power Sys., Inc. v. O2 Micro Intern., Ltd.*, 726 F.3d 1359, 1369 (Fed. Cir. 2013) (75% reduction of block-billed entries).

Here, Plaintiffs' counsel extensively employed block billing. Indeed, as highlighted in the billing statements attached hereto as Ex. G, 77% of the requested fees (\$118,045.20 of \$153,548.28) was block billed. This entire \$118,045.20 must be eliminated, or reduced significantly.

In sum, block billing is not unethical—therefore, as between a lawyer and client, block billing is fine. However, when a party seeks to shift the burden of her counsel's fees to her opponent, block billing is impermissible because the opponent is only responsible for those hours "reasonably spent" on the matter and, with block billing, it is impossible to determine how much time was devoted to a task

B. Clerical Tasks Are Not Compensable

"Purely clerical or secretarial tasks, that is, non-legal work, should not be billed . . . regardless of who performs the work. [Citations omitted.] Time spent, for example, *calendaring matters*, serving documents, and taking dictation is non-compensable clerical work." *Adkins v. Commissioner of Social Security*, 393 F. Supp.3d 713, 720 (N.D. Ohio 2019) (emphasis added). That's because "[c]osts associated with clerical tasks are typically considered overhead expenses reflected in an attorney's hourly billing rate and are not properly reimbursable." *Lemus v. Timberland Apartments, LLC*, 876 F. Supp.2d 1169, 1179 (D. Or. 2012). Indeed, as the United States Supreme Court declared: The "dollar value [of a clerical task] is not enhanced just because a lawyer does it." *Missouri v. Jenkins*, 491 U.S. 274, 288 n.10 (1989).

1 **1. *Calendaring is a clerical task***

2 “Tasks considered clerical include, but are not limited to . . . calendaring dates
3” *McKenzie Flyfishers v. McIntosh*, 158 F. Supp.3d 1085, 1096 (D. Or. 2016);
4 *accord, Knudsen v. Barnhart*, 360 F. Supp.2d 963, 977 (N.D. Iowa 2004) (clerical
5 tasks include “calendar briefing . . . and are not compensable . . . at any rate.”); *I.T. ex*
6 *rel. Renee T. v. Dep’t of Educ., Hawaii*, 18 F. Supp.3d 1047, 1062 (D. Haw. 2014) (non-
7 compensable clerical tasks include “calendaring dates.”).

8 Here, Plaintiffs’ counsel billed several times for calendaring. Indeed, as
9 highlighted (in yellow) on the billing statements attached hereto as Ex. H, Plaintiffs
10 seek \$1,586.00 for calendaring performed by their counsel.⁵ In some instances, more
11 than one attorney calendared the same deadline—resulting in a charge of \$520 per
12 hour to perform a clerical task. (See Ex. H at pg. 7 (LJW and KBC calendaring same
13 due date) and at p. 11 (LJW and WJS calendaring same due date) These clerical
14 tasks are not recoverable at any rate, to say nothing of the \$260-\$520 per hour
15 sought here by Plaintiffs.

16 **2. *Other clerical tasks—filing, preparing exhibits, etc.***

17 The billing statements reveal numerous other non-compensable clerical tasks.
18 For example, Ex. H also highlights (in orange) entries for the clerical tasks of
19 internal filing, downloading documents (as a separate task from reviewing the
20 downloaded document), preparing exhibits and appendixes, creating a table of
21 contents, preparing documents for filing with the court and filing them, and
22 contacting the court clerk for transcripts. These tasks are not compensable. *See I.T.*
23 *ex rel Renee T., supra*, 18 F. Supp.3d at 1062 (clerical tasks “deemed non
24 compensable” include “preparing documents for filing with the Court; filing
25 documents with the Court; . . . receiving, downloading, and emailing documents; and
26 communicating with Court staff.”); *Fox v. Pittsburg State Univ.*, 258 F. Supp. 3d
27 1243, 1257 (D. Kan. 2017) (preparing exhibits is “purely secretarial or clerical in

28 ⁵ Since all calendaring tasks are embedded in block billing entries, it is impossible to ascertain how
much of the \$1,586.00 was actually devoted to calendaring.

1 nature, much like printing, copying, or organizing. They are not properly
 2 compensable even at a legal assistant rate.”); *Blackburn v. ABC Legal Servs., Inc.*,
 3 2012 WL 1067632, at *5 (N.D.Cal. Feb. 24, 2012) (the creation of table of contents
 4 and table of authorities are clerical tasks).

5 Here, as highlighted (in orange) on the billing statements attached hereto as
 6 Ex. H, Plaintiffs seek \$23,374.00 regarding entries that include the foregoing clerical
 7 tasks performed by their counsel.⁶ Plaintiffs are, of course, free to pay their counsel
 8 \$260 per hour for internal filing, preparing exhibits, etc.; however, fee-shifting law
 9 does not require the Lytle Trust to pay for such clerical tasks at any hourly rate.

10 C. Duplicative Efforts Are Not Compensable

11 Duplicative work must be excluded from the lodestar calculation. *E.g.*,
 12 *Herrington v. City of Sonoma*, 883 F.2d 739, 747 (9th Cir. 1989). As the Ninth
 13 Circuit taught, “courts ought to examine with skepticism claims that several lawyers
 14 were needed to perform a task” *Democratic Party of Wash. State v. Reed*, 388
 15 F.3d 1281, 1286 (9th Cir. 2004) (internal citations omitted).

16 Here, Plaintiffs employed the services of the very fine law firm of Christensen
 17 James & Martin. During the period covered by the instant Motion for Fees, no less
 18 than four partners, including all three named partners, and an associate attorney
 19 (with more than 20 years’ experience) billed on this case. “A party is certainly free to
 20 hire and pay as many lawyers as it wishes, but cannot expect to shift the cost of any
 21 redundancies to its opponent.” *Asia Pacific Agr. & Forestry Co. v. Sester Farms, Inc.*,
 22 2013 WL 6157263, at *4 (D. Or. 2013).

23 1. *Inter-office conferences are compensable for only one* 24 *participant*

25 “An example of duplicated effort [is] . . . when attorneys hold a telephone or
 26 personal conference with another attorney. . . . Good billing judgment mandates that
 27 only one participant in the conference should bill that conference to the client.”

28 ⁶ Since all clerical tasks referenced herein are embedded in block billing entries, it is impossible to
 ascertain how much of the \$23,374.00 was actually devoted to these clerical tasks.

1 *Taylor v. Albina Community Bank*, 2002 WL 31973738, at *4 (D. Or. 2002). And, in
 2 today's age of technology, "[r]eading an e-mail is simply another method of holding a
 3 conference." *Id.*

4 Plaintiffs' counsel engaged in numerous conferences amongst themselves.
 5 While Plaintiffs may have paid for these redundancies, the cost for such duplication
 6 cannot be shifted to an opposing party. Indeed, while \$260 per hour may not be
 7 contested here, every internal conference doubles the effective rate to \$520 per hour.

8 The billing statements attached hereto as Exhibit I are highlighted (in blue) to
 9 reflect internal conferences. Because Plaintiffs' counsel employed block billing, it is
 10 impossible to ascertain how much time was expended in these duplicative efforts.
 11 However, (1) the sheer number of internal conferences conclusively demonstrate that
 12 the amount of time was substantial, and (2) it is the movant's burden to support a fee
 13 request with evidence sufficiently detailed to enable the reviewing court to easily
 14 identify the hours reasonably expended on a task. *See Hensley v. Eckerhart*, 461 U.S.
 15 424, 437 (1983) ("the fee applicant bears the burden of establishing entitlement to an
 16 award and documenting the appropriate hours expended and hourly rates").

17 **2. *Multiple attorneys reviewing the same documents and***
 18 ***working on the same tasks are not compensable***

19 "A court may deduct any time entries indicating that more than one attorney
 20 performed the same task." *Bark v. Northrop*, 300 F.R.D. 486, 495 (D. Or. 2014).
 21 Here, several of Plaintiffs' attorneys reviewed the same documents and performed
 22 the same tasks, including duplicate effort to read ministerial/administrative notices
 23 and filings by other homeowner Plaintiffs (similarly aligned and friendly, not adverse
 24 parties) in the consolidated case, including the following (which are also highlighted
 25 in pink on Ex. I):

26 *////*

27 *////*

28 *////*

Date	Timekeepers	Duplicate Tasks	Total Time	Total Amount
6/28/18	WJS	"review Disman's Motion for Summary Judgment"	0.28	\$78.00
7/2/18	KBC	"Review Disman's Motion for Summary Judgment"	0.40	\$104.00
9/18/18	WJS	"Review Amended Docketing Statement of Appeal"	0.20	\$52.00
9/18/18	LJW	"Review Pleading Statement"	0.40	\$104.00
10/17/18	WJS	"review Motions to Consolidate Cases" and "review Docketing State for Case"	0.80	\$208.00
10/18/18	LJW	"Review . . . Motion to Consolidate" and "Review Docketing Statement"	0.40	\$104.00
11/20/18	ELJ	"Preparation of Opposition to Motion to Reconsider"	2.12	\$546.00
11/20/18	LJW	"Preparation of Opposition to Motion to Reconsider"	2.72	\$702.00
12/4/18	KBC	"Review Supreme Court Appeal Decision"	0.40	\$104.00
12/4/18	LJW	"Review Order from Appellate Court"	1.52	\$390.00
12/4/18	WJS	"review Order Affirming District Court"	1.92	\$494.00
1/28/19	WJS	"Review Notice from Supreme Court regarding Order Consolidating Appeals"	0.32	\$78.00
1/29/19	LJW	"Review Court Notice regarding Consolidation"	0.20	\$52.00
2/4/19	LJW	"review Opposition to Motion to Retax Costs"	0.72	\$182.00
2/4/19	WJS	"review Lamothe/Boulden Opposition to Motion to Retax Costs"	0.20	\$52.00
2/12/19	WJS	"review Lytle Motion for Extension of Time to File Brief in Fee Case"	1.60	\$416.00
2/12/19	LJW	"review Motion by Lytle regarding Extension of Time"	2.20	\$572.00
2/13/19	LJW	"Review Court Order regarding Extension of Time"	0.80	\$208.00
2/13/19	WJS	"Review Notice and Order from Supreme Court Granting Extension"	0.20	\$52.00

1	4/22/19	LJW	"Review filings regarding Extensions of Time"	0.32	\$78.00
2	4/22/19	WJS	"review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule"	0.80	\$208.00
3	5/2/19	LJW	"Review Court Order regarding Extension"	0.20	\$52.00
4	5/2/19	WJS	"review Order Denying Lytle Motion for Extension"	0.20	\$52.00
5	3/2/20	WJS	"review Order of Affirmance"	6.00	\$1,560.00
6	3/2/20	LJW	"Review Affirmance Order"	0.40	\$104.00
7	3/11/20	LJW	"Preparation of Motion to Set Aside Order"	3.12	\$806.00
8	3/12/20	KBC	"preparation of Motion to Vacate Order"	0.32	\$78.00
9	3/17/20	WJS	"Draft Opposition/Motion for Receivership Case"	3.40	\$884.00
10	3/17/20	LJW	"Preparation of Opposition to Motion for Receiver Order"	0.60	\$156.00
11	3/19/20	WJS	"Draft Opposition to Motion for Instruction in Receiver Case"	4.80	\$1,248.00
12	3/19/20	LJW	"Prepartaion of Opposition to Motion for Receiver Order"	4.12	\$1,066.00
13	4/22/20	WJS	"Review and revise Order Granting Motion for Order to Show Cause"	1.72	\$442.00
14	4/22/20	LJW	"Review and revise Order on Motion to Show Cause"	3.80	\$988.00

Plaintiffs are certainly entitled to have their attorneys duplicate their efforts; however, Plaintiffs cannot shift the cost of those redundant efforts to the Lytle Trust. Indeed, the problem here is compounded because many of the foregoing entries are block billed with other disqualifying efforts such as internal conferences and clerical tasks. In short, the errors are inextricably intertwined with whatever legitimate tasks were performed at the same time, making it utterly impossible to ascertain the value of any legitimate services. Consequently, the offending entries must be eliminated entirely.

D. Vague Entries Render It Impossible To Determine Reasonableness And Must Be Disallowed

Several of the claimed time entries are so lacking in detail that it is impossible to determine whether the described tasks were reasonable and necessary. Indeed, those entries are so deficient that the Court cannot determine whether the hours were “reasonably expended” or reflect “poor billing judgment.” *Hensley*, 461 U.S. at 434. Those hours must be disallowed. *Id.* at 437 (holding that an application for attorneys’ fees must be supported by billing records that enable the reviewing court to easily identify the hours reasonably expended); *Neil v. Comm’r of Soc. Sec.*, 495 F. App’x 845, 847 (9th Cir. 2012) (The district court appropriately cut time “that was vague and inadequately explained.”).

More specifically, consider the following time entries (*see* Mtn. at Ex. 6):

Date	Timekeeper	Vague Task	Total Time	Total Amount
6/22/18	LJW	“Review Releases”	0.40	\$104.00
10/1/18	LJW	“Review Pleadings and Orders filed”	0.12	\$26.00
10/3/18	LJW	“Review all Appellate Proceedings”	1.00	\$260.00
10/24/18	LJW	“Review Pleadings in Appeal”	0.12	\$26.00
10/29/18	LJW	“Review Pleadings in Appeal”	0.12	\$26.00
11/5/18	LJW	“Review Court Order”	0.12	\$26.00
11/19/18	DEM	“Research”	1.00	\$260.00
11/26/18	LJW	“Review filed document”	0.40	\$104.00
12/13/18	LJW	“Review Response and Stipulation”	0.12	\$26.00
1/8/19	LJW	“Review Court Order”	0.12	\$26.00
1/18/19	LJW	“Review Court Pleadings”	0.12	\$26.00
1/23/19	WJS	“Review Notice from Court”	0.40	\$104.00
3/19/19	LJW	“Review Notice from Court”	0.12	\$26.00
8/27/19	LJW	“Review and download Court Order”	0.12	\$26.00
9/3/19	LJW	“Review and download Pleading”	0.12	\$26.00
			TOTAL =	\$832.00

Each of the foregoing time entries preclude any meaningful evaluation regarding what specifically was performed. For example, it is impossible to tell what pleading, order, or notice was reviewed? Indeed, the inherent vagueness precludes a determination whether the task was even associated with this case or, as sometimes

1 happens, was billed by mistake to the wrong client matter. Each of the foregoing
2 time entries should be eliminated. Indeed, the fact that most of the foregoing entries
3 are block-billed with other tasks mandates the entire entry be eliminated from any
4 fee award.

5 **IV. ANALYSIS OF THE *BRUNZELL* FACTORS**

6 Plaintiffs' Motion skips the foregoing lodestar analysis and instead jumps to
7 the second step, i.e., analysis of the factors enunciated in *Brunzell v. Golden Gate*
8 *Nat'l Bank*, 85 Nev. 345, 455 P.2d 31 (1969). Analysis of the four *Brunzell* factors
9 follows:

10 **A. The Professional Qualities of the Advocates**

11 The undersigned has known some of the Plaintiffs' counsel for years, both
12 professionally and in other settings. They are fine attorneys. The Lytle Trust is not
13 going to waste anyone's time trying to convince the Court otherwise.

14 **B. The Character of the Work to be Done**

15 This *Brunzell* factor focuses on the "difficulty" of the work to be performed, not
16 the quantity or quality of the work actually performed, which are considered in other
17 factors, including the lodestar analysis. Importantly, however, since fees were
18 previously awarded through judgment, consideration of the *Brunzell* factors here
19 regards only the post-judgment period covered by the Motion. In other words,
20 Plaintiffs already sought and recovered fees based on an analysis of the *Brunzell*
21 factors from commencement of the case through judgment. If Plaintiffs are entitled
22 to an additional award of fees, they must satisfy the *Brunzell* factors based on an
23 analysis as of the date of the last fee award. The work to be performed during the
24 relevant post-judgment period was routine, not difficult or complex—the work
25 consisted of three general categories: (1) routine post-judgment motions, (2) the
26 resulting appeal (which did not include oral argument), and (3) the recent contempt
27 motion associated with the appointment of a receiver over the Association.
28

1 Plaintiffs suggest the case “involved a complex procedural history, not only
 2 with the Lamothe and Boulden litigation, but with several previous cases between
 3 the Lytle Trust and the Association” (Mtn. at 19:11-12). However, Plaintiffs
 4 disregard that this covers a period resolved in the first award of fees. In other words,
 5 whether this case “involved a complex procedural history” at its commencement says
 6 nothing about whether the post-judgment work to be performed was complex.
 7 Indeed, in their appellate brief, Plaintiffs suggested the case was not “novel or
 8 complex.” (Respondents’ Answering Brief at 40, “Merely because the Judge had not
 9 been presented all of the points and authorities to make an informed decision is not
 10 evidence that the issues were novel or complex.”, and at 41, “In other words, [Judge
 11 Williams] completely disagrees with the Appellants’ characterizations of the novelty
 12 and complexity of this case.”).

13 Further, just because a case has a prior history does not make it complex.
 14 Most cases start with a clean procedural slate. That a case has a prior history
 15 requiring counsel to come up to speed in order to adequately represent the client just
 16 means the case is more time consuming, not more difficult or complex. Otherwise,
 17 every time counsel substitutes into a garden-variety, routine case with a prior history
 18 (as will always be the case, by definition, when new counsel substitutes into an
 19 existing case), such would convert the routine case into a difficult and complex one,
 20 which defies common sense.

21 In short, just because a case is more time consuming (which is considered and
 22 compensated in the lodestar analysis) or even hotly contested does not make it
 23 difficult or complex. *See Lopez v. Superior Nut Co.*, 2006 WL 1745803, at *2 (Mass.
 24 Super. June 12, 2006) (“Although hotly contested, the issues were not particularly
 25 complex in this matter.”).

26 C. The Work Actually Performed By The Lawyer

27 This factor looks at the actual work performed; “the skill, time and attention
 28 given to the work.” *Brunzell*, 85 Nev. at 349, 455 P.2d at 33. The “time and

attention” given to the work is addressed above in the lodestar analysis and won’t be repeated here.⁷ Otherwise, given (1) the non-difficult and non-complex nature of the work Plaintiffs’ counsel performed, and (2) counsel’s level of experience, Plaintiffs’ counsel certainly possessed the necessary skills to handle and prevail in this work.

D. The Result Obtained

The Lytle Trust does not dispute that Plaintiffs obtained a favorable result in the appeal and the recent contempt motion.

E. Summary of *Brunzell* Factors

Seeking nearly \$155,000 in fees for routine post-judgment motions, an appeal that required drafting one brief and did not involve oral argument, and a contempt proceeding, is excessive.

V. PLAINTIFFS ARE NOT ENTITLED TO A STANDING ORDER FOR ALL FUTURE FEES

Plaintiffs ask this Court to award not just the fees incurred to date, including through the hearing on the Motion, but incredibly also ask for a standing order “that additional fees be awarded for . . . any further proceedings herein.” (Mtn. at 13:10; *see also, id.* at 22:2-4, “since litigation is still ongoing Plaintiffs would like the opportunity to amend the amounts due and owing once litigation on this matter is final since there are other matters that will still come before this Court for which the Plaintiffs will also incur fees.”).

However, with each request for fees, Plaintiffs must first demonstrate a contract, statute, or rule basis for entitlement to a fee award, and, assuming a basis exists, must further demonstrate that the efforts expended and amount sought are reasonable and necessary. There is no “once entitled, always entitled” rule. If a situation arises in the future when Plaintiffs believe they are entitled to an additional award of fees, they have the right and the obligation to file another motion

⁷ However, here again, the Motion focuses attention on the wrong period of time. Plaintiffs suggest that “[m]uch time has been required to look into the facts and circumstances of the three (3) prior cases (Rosemere Litigation I, II and III) filed by the Lytle Trust against the Association, as well as the history of the Lamothe and Boulden case, and the Receivership Action.” (Mtn. at 20:7-10). However, all of these things, except the Receivership Action, were already covered by the initial fee award.

1 (or seek a stipulation from the Lytle Trust). They are not entitled to an order in
2 perpetuity now.

3 CONCLUSION

4 Plaintiffs are not entitled to any fees under the Original CC&Rs because the
5 triggering subject matter of the fee shifting provision (para. 25) has not been met.
6 Further, Plaintiffs are not entitled to an award of any fees incurred in the
7 Receivership Action—if entitled at all to such fees, they must be sought from and
8 awarded by Judge Kishner in the Receivership Action.

9 Beyond those fatal defects, it is virtually impossible to evaluate whether the
10 time expended on most tasks performed by Plaintiffs' counsel was reasonable and
11 necessary. But, this is neither a problem the Lytle Trust made nor a burden it must
12 bear. Plaintiffs bear the burden of proving the reasonableness of each charge. They
13 have not and cannot satisfy this burden given the state of the submitted evidence. A
14 very substantial discount (well in excess of 50%) must be applied due to (1) the
15 liberal use of block billing, (2) billing for clerical tasks, (3) vague entries, (4) duplicate
16 work, and (5) work performed in the Receivership Action.

17
18 Dated this 9th day of June, 2020.

19 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

20
21 By: /s/ Dan R. Waite

22 DAN R. WAITE (SBN 4078)
23 3993 Howard Hughes Parkway, Suite 600
24 Las Vegas, Nevada 89169
25 (702) 949-8200
26 *Attorneys for Defendants*
27
28

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that on this day, I caused a true and correct copy of the following ***“DEFENDANT LYTLE TRUST’S OPPOSITION TO PLAINTIFFS’ MOTION FOR ATTORNEY FEES AND COSTS”*** to be e-filed and served via the Court’s E-Filing System.

Richard Haskin
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Attorneys for Robert Z. Disman and Yvonne A. Disman

Dated this 9th day of June, 2020

/s/ Luz Horvath
 An Employee of Lewis Roca Rothgerber Christie LLP

Lewis Roca
 ROTHGERBER CHRISTIE

3993 Howard Hughes Pkwy, Suite 600
 Las Vegas, NV 89169-5996

Exhibit A

000329

000329

Exhibit A

History of Billing

September Trust, dated March 23, 1972

1861 Rosemere Ct.
Las Vegas, NV 89117

Professional Services

		Hrs/Rate	Amount
5/23/2018	- LJW Preparation of Memorandum of Costs	0.43 260.00/hr	110.50
5/24/2018	- LJW Conference with W Smith regarding Fees and Costs; review Bills to redact Privileged Information; conference with Clerk	0.48 260.00/hr	123.50
	- WJS Email from L Wolff regarding Motion for Fees; review signed Order; conference with Clerk regarding filing Order; preparation of Notice of Entry of Order; review draft Notice of Entry; conference with L Wolff regarding Motion for Fees, review Billing Statements	0.25 260.00/hr	65.00
5/28/2018	- LJW E-mails to and from Clerk regarding Notice	0.03 260.00/hr	6.50
5/29/2018	- LJW Preparation of Motion for Fees; preparation of Declaration for Fees; preparation of Exhibits	0.63 260.00/hr	162.50
5/30/2018	- LJW Preparation of Declaration for Fees; preparation of Exhibits for Motion; review Billings for Privilege; telephone call to Clerk regarding Redaction of Privileged Information; preparation of Spreadsheet calculating Fees and Costs	0.58 260.00/hr	149.50
5/31/2018	- DEM Preparation of documents for Disclosure in Motion for Fees; conference with W Smith	0.13 260.00/hr	32.50
	- LJW Preparation of Declaration for Fees; preparation of Exhibits for Motion; preparation of Spreadsheet calculating Fees and Costs	0.38 260.00/hr	97.50
	- WJS Review redacted Fee Statements; prepare for filing; review and redline draft Motion for Fees, associated Research and Citation Check; review and redline Declaration in Support of Fees Motion	1.38 260.00/hr	357.50

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2018 - WJS	Revise Motion, Declaration and Memo of Costs; conference with Clerk regarding Fee Statements; email to L Wolff; review Rules regarding Timing	0.28 260.00/hr	71.50
- LJW	Telephone call with W Smith regarding Motion for Attorney's Fees and Costs; telephone call with Clerk regarding redaction of Bills; review revisions to Motion	0.13 260.00/hr	32.50
6/4/2018 - WJS	Emails to and from L Wolff; revise Fees Motion and related Documents	0.20 260.00/hr	52.00
- LJW	Review and revise Memorandum of Costs, Declaration of W. Smith, Motion for Attorney's Fees and Costs, Exhibits and update Summary of Fees and Costs; telephone call to Clerk regarding redaction and filing updated Billing Summary	0.55 260.00/hr	143.00
6/5/2018 - WJS	Review Notices from Court; review filings; calendar Hearing Date; email to L Wolff regarding Notice of Hearing	0.08 260.00/hr	19.50
6/6/2018 - LJW	Preparation of Notice of Hearing; emails to and from W Smith regarding Notice; emails to and from Clerk regarding Notice; review filed Pleadings	0.15 260.00/hr	39.00
6/11/2018 - LJW	Review Motion to Retax Costs; email to W Smith regarding Motion; email to Clerk regarding Receipts; Research Evidence of Costs	0.43 260.00/hr	110.50
6/12/2018 - LJW	Research Memorandum and Evidence of Costs; telephone call to Clerk regarding Receipts and Spreadsheet; preparation of Opposition to Motion to Retax Costs	0.48 260.00/hr	123.50
6/13/2018 - WJS	Email from R Haskin; emails to and from L Wolff; review NRAP; emails to and from R Haskin regarding Request for Stipulation on Appeal Reply	0.20 260.00/hr	52.00
- LJW	Preparation of Opposition to Motion to Retax Costs; emails to and from W Smith regarding request to file Reply; Research Issues related to Replies to Amicus Brief; telephone call with Clerk regarding Costs	0.58 260.00/hr	149.50
6/14/2018 - LJW	Research Costs Awarded by District Courts and preparation of Opposition to Motion to Retax Costs	0.33 260.00/hr	84.50
6/15/2018 - WJS	Emails to and from L Wolff; review and revise Opposition to Motion to Retax Costs and Support Declarations; telephone call from L Wolff; conference with K Christensen	0.38 260.00/hr	97.50
- LJW	Preparation of Opposition to Motion to Retax Costs; revisions to Motion; preparation of Declaration for Opposition; preparation of Exhibits for Opposition; emails to and from W Smith; emails to and from Clerk	0.95 260.00/hr	247.00
6/19/2018 - WJS	Review Notices from Court; review Notice of Appeal and Appeal Statement filed by Lytles; review Property Records regarding Recorded Releases; review NRAP regarding timing and Appeal; review Notice from Supreme Court; review Motion for Leave to File	0.35 260.00/hr	91.00

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Response to Amicus Brief; email to D Foley and C Wang regarding Motion and Appeal Issues		
6/19/2018	- KBC	Conference with W Smith regarding Appeal Notice and Fees Motion; calendar Brief Due Dates	0.05 260.00/hr	13.00
6/20/2018	- WJS	E-mails to and from D Foley; draft Opposition to Motion for Leave to Respond to Amicus Brief; email to D Foley	0.55 260.00/hr	143.00
	- LJW	Review Motion to File Amicus Brief; emails to and from W Smith regarding Amicus	0.10 260.00/hr	26.00
6/22/2018	- LJW	Review Releases	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court; review Opposition to Motion for Fees; email to L Wolff regarding Reply; review Notice from Supreme Court; review Response to Motion to Respond to Amicus Brief (filed by Foley)	0.10 260.00/hr	26.00
6/25/2018	- LJW	Review Pleadings; emails to and from W Smith regarding Motion	0.05 260.00/hr	13.00
6/26/2018	- KBC	Conference with W Smith regarding Fees Motion, Appeal Brief, Consolidation and Client conference for Instructions	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court regarding Docketing of Notice of Appeal; review Record Transmitted by District Court; conference with K Christensen; email to Clients	0.23 260.00/hr	58.50
6/27/2018	- LJW	Review Opposition; preparation of Reply to Opposition	0.18 260.00/hr	45.50
6/28/2018	- LJW	Research Arbitration Requirement and CC&Rs; preparation of Reply to Opposition	0.73 260.00/hr	188.50
	- WJS	Review Notice from District Court; review Disman's Motion for Summary Judgment; emails to and from L Wolff	0.08 260.00/hr	19.50
6/29/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees	0.38 260.00/hr	97.50
7/2/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; Research NRS 38.310	1.18 260.00/hr	305.50
	- KBC	Review Disman's Motion for Summary Judgment; conference with Clerk; calendar Hearing	0.10 260.00/hr	26.00
7/3/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply	0.85 260.00/hr	221.00
7/5/2018	- WJS	Email from and telephone calls to and from L Wolff regarding Arguments for Reply Brief; review and revise Reply on Motion for Fees and Costs; Research; emails to and from L Wolff	0.45 260.00/hr	117.00

September Trust, dated March 23, 1972

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	<u>Hrs/Rate</u>	<u>Amount</u>
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7/5/2018 - LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply; telephone call to W Smith; email to Clerk regarding filing; Research Liens and Possessor Interests; Research Lytles Defenses regarding recording Liens	0.83 260.00/hr	214.50
7/6/2018 - LJW	Review Order; calendar Hearing Date	0.03 260.00/hr	6.50
- WJS	Review Notice from Court regarding Rescheduled Hearing; emails to and from R Haskin and C Wang regarding Hearing Date	0.05 260.00/hr	13.00
7/20/2018 - LJW	E-mails to and from W Smith regarding Transcript; Research on Appellate Rules and Transcripts; email to opposing counsel	0.38 260.00/hr	97.50
7/23/2018 - WJS	Review Notice from Supreme Court; review Order Denying Motion to Respond to Amicus Brief	0.08 260.00/hr	19.50
7/24/2018 - WJS	E-mail from Counsel for Lytle; review Hearing Transcripts	0.10 260.00/hr	26.00
7/25/2018 - WJS	Review Motions, Oppositions, Replies and Exhibits related to Fees and Costs; prepare for Hearing on Motion	0.45 260.00/hr	117.00
7/26/2018 - WJS	Prepare for, attend and present Oral Argument at Hearing on Motion for Attorney's Fees and Costs; conference with C Wang regarding Dismans Motion for Summary Judgment; review Docket and Opposition; conference with E James regarding Hearing; telephone call from C Wang	1.03 260.00/hr	266.50
7/27/2018 - KBC	Review Hearing Notice; calendar Hearing on Motion for Summary Judgment; conference with W Smith	0.03 260.00/hr	6.50
7/30/2018 - LJW	Review Case Statement; emails to and from opposing counsel; emails to W Smith; review Orders and Motions	0.15 260.00/hr	39.00
8/2/2018 - LJW	Review and download Pleadings filed by Dismans and Lytles	0.13 260.00/hr	32.50
8/6/2018 - LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
- WJS	Review Court Notices and Reply Brief from Dismans; emails to and from L Wolf regarding Hearing	0.23 260.00/hr	58.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2018	- WJS	E-mails to and from L Wolff and D Foley regarding Boulden & Lamothe Fee Motion; review Transcripts; preparation for Hearing	0.33 260.00/hr	84.50
	- LJW	Review Court Record regarding Attorney's Fees Motion; Research ruling in Boulden/Lamothe Case; emails to and from W Smith; Research Special Damages Cases	0.40 260.00/hr	104.00
8/8/2018	- LJW	Review emails from Counsel for Boulden; emails to and from W Smith	0.03 260.00/hr	6.50
8/9/2018	- WJS	Preparation for Hearing; attend Hearing on Fees and Costs Motion and Dismans Motion for Summary Judgment; file notes regarding Court Decision; conference with D Foley and C Wang at Courthouse regarding outcome of Hearing, Appeal Issues and strategy; conference with K Christensen regarding Court Order; Research Supersedeas Bonds; email to L Wolff regarding Summary of Court Decision and draft Order; telephone call from L Wolff regarding draft Order	0.80 260.00/hr	208.00
	- KBC	Conference with W Smith; review Order, Entry and Recording Procedures	0.05 260.00/hr	13.00
	- LJW	Telephone call to W Smith regarding Hearing and Case; preparation of Order	0.08 260.00/hr	19.50
8/10/2018	- LJW	Preparation of proposed Order	0.18 260.00/hr	45.50
8/13/2018	- LJW	Preparation of proposed Order; texts to and from W Smith	0.50 260.00/hr	130.00
8/14/2018	- LJW	Preparation of proposed Order; review Motion; Research applicable NRS Statutes; email to W Smith	0.58 260.00/hr	149.50
8/15/2018	- LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	E-mails from and to R Haskin; review and revise draft Order on Fees and Costs	0.35 260.00/hr	91.00
8/16/2018	- WJS	Emails to and from R Haskin regarding draft Fee Order	0.03 260.00/hr	6.50
8/20/2018	- WJS	Email from R Haskin; review and analyze redlines to draft Order; redline revisions to draft Order; emails to and from R Haskin; prepare draft Order; email to all Counsel	0.23 260.00/hr	58.50
8/21/2018	- DEM	Conference with W Smith	0.08 260.00/hr	19.50
	- WJS	E-mails to and from R Haskin and D Foley	0.03 260.00/hr	6.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018 - LJW	Review and download Order; review Rules regarding Appeal Statement; email to W Smith	0.08 260.00/hr	19.50
9/12/2018 - WJS	Review Order; conference with Clerk regarding filing	0.03 260.00/hr	6.50
9/13/2018 - WJS	Review Order; conference with Clerk; review draft Notice of Entry of Order; review Notices from Court regarding filing Order and Notice of Entry; review Notice from NV Supreme Court regarding Submission of Boulden/Lamothe Appeal for Decision without Oral Argument; conference with K Christensen	0.08 260.00/hr	19.50
9/14/2018 - LJW	Review Notice of Appeal and Order regarding Hearing; emails to and from W Smith	0.10 260.00/hr	26.00
9/18/2018 - WJS	Review Amended Docketing Statement of Appeal	0.05 260.00/hr	13.00
- LJW	Review Pleading Statement	0.10 260.00/hr	26.00
9/21/2018 - WJS	Review Notices from Supreme Court regarding Attorney's Fees Appeal; review Notice from District Court regarding Order Denying Disman Motion for Summary Judgment; telephone call from C Wang	0.15 260.00/hr	39.00
9/24/2018 - KBC	Conference with Attorney; review Research; telephone call to Client regarding Fees Order Recordation	0.08 260.00/hr	19.50
- LJW	Review and download Case Appeal and other Pleadings	0.08 260.00/hr	19.50
- WJS	Email from R Haskin; Research Judgment, Appeal, Stay and Supersedeas Bond Statutes and Caselaw; emails to and from and conference with K Christensen; review Judgment Lien and Recording Procedures; draft Affidavit for Recording Judgment; conference with Clerk regarding Certified Judgment; review Certified Judgment and prepare for Recording	0.65 260.00/hr	169.00
10/1/2018 - WJS	Research and draft Response to Motion to Stay and Post Supersedeas Bond; prepare for filing; review Notice from Court; review Appeal Statement	0.50 260.00/hr	130.00
- LJW	Review Pleadings and Orders filed	0.03 260.00/hr	6.50
- ELJ	Review Opposition to Motion to Stay Judgment and Deposit Bond	0.05 260.00/hr	13.00
10/2/2018 - WJS	Review Notices from Court; emails to and from L Wolff regarding Appeal Deadlines; email from C Wang; review draft Order Denying Disman's Motion for Summary Judgment; email to C Wang with Comments	0.30 260.00/hr	78.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2018	- WJS Telephone call from C Wang regarding draft Order on Disman Motion for Summary Judgment; Research Case impact; telephone call and email from Haskin's Office; review Stipulation to Continue Hearing on Stay and Bond; emails to and from Court; review Filings	0.15 260.00/hr	39.00
	- LJW Review all Appellate Proceedings; Research and calendar Due Dates for Briefing Schedules; emails to and from W Smith	0.25 260.00/hr	65.00
10/4/2018	- KBC Review Order regarding Settlement Program Exemption; calendar Appeal Brief Due Date; conference with W Smith	0.05 260.00/hr	13.00
10/8/2018	- KBC Conference with W Smith regarding Appeal Consolidation Issues	0.05 260.00/hr	13.00
	- LJW E-mails to and from W Smith; review filed Pleadings	0.08 260.00/hr	19.50
	- WJS Draft email to Clients regarding update on Case; emails to and from L Wolff regarding Appeal Issues and potential Consolidation or Stay of later Appeals; conference with K Christensen	0.25 260.00/hr	65.00
10/9/2018	- LJW E-mails to and from W Smith; review Pleadings	0.03 260.00/hr	6.50
	- WJS Revise and send email to Clients regarding Case update and Recommendation on Appeals	0.05 260.00/hr	13.00
	- KBC Review Appeal Options and email	0.05 260.00/hr	13.00
10/17/2018	- WJS Review Notices from Supreme Court; review Motions to Consolidate Cases from Haskin; emails to and from Haskin to clarify Motion to Consolidate Request and Briefing; review Docketing Statement for Case	0.20 260.00/hr	52.00
10/18/2018	- WJS Emails to and from R Haskin regarding Motion to Consolidate; emails to and from and telephone call from D Foley regarding Opposition to Motion to Consolidate	0.08 260.00/hr	19.50
	- LJW Review Docketing Statement and Motion to Consolidate; emails to and from W Smith	0.10 260.00/hr	26.00
10/19/2018	- WJS Review Notice from Court; review Opposition to Motion to Consolidate filed by D Foley	0.08 260.00/hr	19.50
10/23/2018	- WJS Preparation for Hearing; Appearance at Hearing; present Argument in Opposition to Motion to Stay Case pending Appeal; Research; review Nevada State Court Case regarding Fees and Costs Awards; telephone call from Counsel for Disman; conferences with L Wolff and K Christensen; Research regarding Advisory Opinions and Legal Advice from a Judge; review draft Opposition to Motion to Consolidate; review Notices from Court; review Joinder filed by Disman	0.85 260.00/hr	221.00

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2018	- KBC	Conference with W Smith regarding Hearing, Order and conference with opposing counsel	0.05 260.00/hr	13.00
	- LJW	Review Opposition to Motion to Consolidate Cases; preparation of Responses to Motion to Consolidate Cases; telephone call to W Smith regarding Hearing; Research Attorney's Fees	0.50 260.00/hr	130.00
10/24/2018	- WJS	Review Notices from Supreme Court; review Lytles' Reply Brief in Support of Consolidating Cases	0.05 260.00/hr	13.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
10/29/2018	- WJS	Emails to and from R Haskin regarding Extension of Briefing Dates and Joint Motion to Consolidate Cases; review draft Stipulations; review Notice from Supreme Court regarding Filings	0.10 260.00/hr	26.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
11/1/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Consolidate with Boulden Appeal	0.05 260.00/hr	13.00
11/5/2018	- LJW	Review Court Order	0.03 260.00/hr	6.50
11/7/2018	- WJS	Email from Counsel for Disman; review letter to Court from Counsel for Disman regarding proposed Summary Judgment Orders; telephone call from Counsel for Disman	0.10 260.00/hr	26.00
11/15/2018	- LJW	Review Court Order regarding Jurisdiction	0.03 260.00/hr	6.50
11/16/2018	- DEM	Conference with W Smith; revise Stipulation to Extend Discovery; email from W Smith	0.08 260.00/hr	19.50
	- ELJ	Conference with W Smith and D Martin regarding Emergency Motion	0.15 260.00/hr	39.00
	- WJS	Review Notices from District Court regarding Motion to Reconsider and Order Shortening Time; review Motion; Research Caselaw, Reconsideration and Jurisdiction Issues; email to R Haskin regarding Hearing; conferences with E James and D Martin regarding preparation of Response and attending Hearing	0.53 260.00/hr	136.50
11/19/2018	- ELJ	Preparation of Opposition to Motion to Reconsider	0.95 260.00/hr	247.00
	- DEM	Research; email to W Smith; conference with E James	0.25 260.00/hr	65.00
	- KBC	Review Appeal Order and Order Shortening Time regarding Fees Hearing; conference with E James; email to L Wolff	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2018	- LJW	Review Motion to Reconsider and Order Shortening Time; emails to and from Attorneys	0.10 260.00/hr	26.00
11/20/2018	- ELJ	Preparation of Opposition to Motion to Reconsider and review with L Wolff	0.53 260.00/hr	136.50
	- LJW	Preparation of Opposition to Motion to Reconsider; telephone call to E James	0.68 260.00/hr	175.50
11/21/2018	- LJW	Revisions to Opposition to Motion to Reconsider; emails to and from E James and Clerk	0.30 260.00/hr	78.00
11/26/2018	- LJW	Review filed document	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court and Opposition; preparation for Hearing	0.38 260.00/hr	97.50
11/27/2018	- ELJ	Conference with W Smith regarding Motion to Reconsider Attorney's Fees and Finality of Appeal	0.15 260.00/hr	39.00
	- WJS	Preparation for Hearing; Appearance at Hearing on Motion to Reconsider Fees Order and present Arguments in Opposition; conferences with E James and D Martin re outcome and pending Appeal Issues; review Order to Show Cause from Supreme Court; Research Cases cited by Supreme Court; conferences with E James and D Martin; review possible Dismissal of Appeal; emails to and from R Haskin regarding Extension of Time for Briefing in 71698 Appeal; review draft Stipulation	1.08 260.00/hr	279.50
	- LJW	Telephone call with W Smith regarding Hearing and Appeal Issues	0.05 260.00/hr	13.00
11/28/2018	- LJW	Review Stipulation and Order; emails to and from W Smith	0.03 260.00/hr	6.50
12/4/2018	- KBC	Review Supreme Court Appeal Decision; conference with W Smith regarding Procedures and Recommendations	0.10 260.00/hr	26.00
	- LJW	Review Order from Appellate Court; telephone call to W Smith regarding Order; preparation of Response to Order to Show Cause	0.38 260.00/hr	97.50
	- WJS	Review Notice from Nevada Supreme Court regarding Boulden/Lamothe Appeal; review Order Affirming District Court; telephone call from Counsel for Dismans regarding Issues remaining in District Court; telephone call from L Wolff regarding Order, coordination and analysis of Actions to resolve remaining Appeals and Issues; conference with K Christensen	0.48 260.00/hr	123.50
12/5/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeals; preparation of Motion to Dismiss; emails to and from W Smith	0.40 260.00/hr	104.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018	- WJS Research Attorney's Fees on Appeal; review Supreme Court's 12/4/18 Order and Arguments; file notes; email to L Wolff regarding Issues; emails to and from Haskin, Foley and Wang regarding Supreme Court Order; coordinate Conference Call; emails from L Wolff	0.45 260.00/hr	117.00
12/6/2018	- LJW Review Court Order regarding Extension	0.03 260.00/hr	6.50
	- WJS Emails to and from opposing counsel regarding Conference Call	0.03 260.00/hr	6.50
12/7/2018	- WJS Teleconference with Counsel (Haskin, Foley, Wang) regarding Supreme Court Decision and potential Resolution; conference with K Christensen; telephone call to L Wolff; review Supreme Court filing; review CC&Rs; draft letter to R Haskin regarding Dismissal of Appeal and Warning of Sanctions	0.60 260.00/hr	156.00
	- KBC Conference with W Smith; review Appeal and Trial Procedures; review Negotiations Issues	0.10 260.00/hr	26.00
	- LJW Telephone call with W Smith regarding Motions	0.08 260.00/hr	19.50
12/10/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.50 260.00/hr	130.00
	- WJS Email from L Wolff; review and revise letter to Haskin; email from D Foley	0.15 260.00/hr	39.00
12/11/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.60 260.00/hr	156.00
12/12/2018	- KBC Review rescheduled Pre-Trial Conference, Calendar Call and Trial Dates for related Case; review emails regarding Fees Brief and Continuance Request	0.05 260.00/hr	13.00
	- LJW Preparation of Response to Order to Show Cause; Research Federal and State Rules regarding Consolidation; emails to and from W Smith; calendar dates for Trial	0.50 260.00/hr	130.00
	- WJS Email to L Wolff; review and redline draft Response to Order to Show Cause	0.60 260.00/hr	156.00
12/13/2018	- LJW Review Response and Stipulation	0.03 260.00/hr	6.50
	- WJS Revise and draft Response to Order to Show Cause; prepare for filing	0.40 260.00/hr	104.00
12/14/2018	- WJS Review Notices from Supreme Court; email from D Foley	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2018	- KBC	Conference with Client regarding Appeal Issues and Lytle's Health Extension Request	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Lytle Response to Order to Show Cause	0.05 260.00/hr	13.00
12/18/2018	- LJW	Preparation of Response to Opposition to Order to Show Cause	0.25 260.00/hr	65.00
	- WJS	Emails to and from L Wolff regarding Order to Show Cause; email to D Foley and C Wang regarding Attorney's Fee Appeal; email from D Foley; review Stipulation for Dismissal of Remaining Claims in District Court Case	0.18 260.00/hr	45.50
12/19/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research on Hearing and on Frederic case	0.70 260.00/hr	182.00
	- WJS	Email from C Wang regarding Stipulation for District Court Case; email from R Haskin	0.05 260.00/hr	13.00
12/20/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research 54(b) Certification	0.50 260.00/hr	130.00
12/21/2018	- LJW	Preparation of Response to Lytle's Reply to Order to Show Cause; emails to and from W Smith	0.30 260.00/hr	78.00
	- WJS	Review and revise Response to Lytle's Reply to Order to Show Cause; review docket in District Court Case; email to L Wolff	0.25 260.00/hr	65.00
12/27/2018	- LJW	Review Order and calendar Due Date	0.03 260.00/hr	6.50
	- WJS	Email from R Haskin; review proposed changes to Dismissal Stipulation; review Notice from Supreme Court regarding Briefing Schedule; calendar Deadlines; conference with D Martin regarding Pre-Trial Conference	0.08 260.00/hr	19.50
1/3/2019	- WJS	E-mails from opposing counsel; review Redlines to draft Stipulation	0.08 260.00/hr	19.50
1/7/2019	- DEM	E-mails from and to W Smith; telephone calls to and from W Smith; review file	0.13 260.00/hr	32.50
	- WJS	Review Notice of Hearing; emails to and from and telephone calls to and from D Martin regarding Pre-Trial Conference; emails to and from opposing counsel regarding Stipulation; review draft	0.08 260.00/hr	19.50
1/8/2019	- WJS	Prepare for Pretrial Conference; Meeting with D Foley regarding Stipulation; Appearance for Pre-Trial Conference in Department 9 (D Barker); conference with D Foley regarding Fees and Costs; telephone call from C Wang regarding Appeal Issues, Fees and Costs; conference with K Christensen	0.60 260.00/hr	156.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019 - LJW	Review Court Order	0.03 260.00/hr	6.50
1/15/2019 - LJW	Review Stipulation and Order; telephone call to W Smith regarding Brief	0.08 260.00/hr	19.50
- WJS	Review Notices from Supreme Court and Opening Brief filed by Lytle's in Case No. 76198; telephone call to L Wolff regarding Issues on Appeal, substance of Lytle's Brief; and preparation of Response Brief	0.18 260.00/hr	45.50
1/16/2019 - LJW	Preparation of Reply to Appellant's Brief	1.03 260.00/hr	266.50
- WJS	Review Notices from District Court; review Boulden & Lamothe Memo of Costs and Motion for Fees	0.15 260.00/hr	39.00
1/17/2019 - WJS	Review and notate Lytle's Opening Brief	0.30 260.00/hr	78.00
1/18/2019 - LJW	Review Court Pleadings	0.03 260.00/hr	6.50
1/19/2019 - LJW	Preparation of Statement of Facts for Reply to Appellate Brief	0.55 260.00/hr	143.00
1/21/2019 - LJW	Preparation of Points and Authorities regarding Law of Case Doctrine	1.00 260.00/hr	260.00
1/22/2019 - LJW	Preparation of Points and Authorities regarding Equitable Orders	0.53 260.00/hr	136.50
1/23/2019 - LJW	Preparation of Points and Authorities regarding Macintosh Caselaw	0.50 260.00/hr	130.00
- WJS	Review Notice from Court; review Dismar's Motion for Fees and Costs; review Docket for Hearing Dates	0.10 260.00/hr	26.00
1/24/2019 - LJW	Preparation of Points and Authorities regarding Meaning of Statutes	0.48 260.00/hr	123.50
1/28/2019 - LJW	Preparation of Points and Authorities regarding Meaning of Statutes; Research "Plain Meaning Cases"	0.28 260.00/hr	71.50
- WJS	Review Notice from Supreme Court regarding Order Consolidating Appeals; email to L Wolff regarding Response; calendar new Deadlines	0.08 260.00/hr	19.50
1/29/2019 - LJW	Review Court Notice regarding Consolidation; calendar new Due Dates	0.05 260.00/hr	13.00
- WJS	Review Notice from District Court; review Lytle's Opposition to Boulden/Lamothe Motion for Fees and Costs	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2019 - LJW	Review NRED 3 Litigation; review Opposition to Motion for Fees; preparation of Points and Authorities regarding "Plain Meaning" of Statutes	0.30 260.00/hr	78.00	
2/1/2019 - LJW	Preparation of Points and Authorities on Plain Meaning of Statute	0.18 260.00/hr	45.50	
2/4/2019 - LJW	Preparation of Points and Authorities on Statute; review Opposition to Motion to Retax Costs	0.18 260.00/hr	45.50	
- WJS	Review Notice from District Court; review Lamothe/Boulden Opposition to Motion to Retax Costs	0.05 260.00/hr	13.00	
2/5/2019 - LJW	Preparation of Points and Authorities on Application of NRS 116.3117	0.33 260.00/hr	84.50	
2/7/2019 - LJW	Research NRS 116.3117 and Judgment Liens	0.58 260.00/hr	149.50	
2/8/2019 - LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.13 260.00/hr	32.50	
2/11/2019 - WJS	E-mail from R Haskin regarding Order on Motion to Reconsider, Analysis and Order Issues	0.08 260.00/hr	19.50	
- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.50 260.00/hr	130.00	
2/12/2019 - ELJ	Conference with W Smith regarding Mootness of Order and Appeal Issues	0.08 260.00/hr	19.50	
- WJS	Conference with E James regarding Haskin's request; Research; emails to and from R Haskin regarding Motion to Reconsider and Extension Request; Notice from District Court and review Lytle Opposition to Disman Fee Motion; review Notice from Supreme Court and review Lytle Motion for Extension of Time to File Brief in Fees Case; emails to and from L Wolff regarding Extension Request	0.40 260.00/hr	104.00	
- LJW	Preparation of Summary of Facts on Answering Brief; Research Extension of Time to Answer Attorney's Argument Brief; email to W Smith; review Motion by Lytle regarding Extension of Time	0.55 260.00/hr	143.00	
2/13/2019 - LJW	Preparation of Objections to Summary of Facts in Answering Brief; review Court Order regarding Extension of Time	0.20 260.00/hr	52.00	
- WJS	Review Notice and Order from Supreme Court Granting Extension; calendar new Deadlines	0.05 260.00/hr	13.00	
2/14/2019 - LJW	Preparation of Objections to Summary of Facts in Answering Brief	0.45 260.00/hr	117.00	
2/18/2019 - LJW	Review Reply to Opposition	0.08 260.00/hr	19.50	

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.25 260.00/hr	65.00
	- WJS Review Notices from District Court; review Minute Order	0.03 260.00/hr	6.50
2/21/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.45 260.00/hr	117.00
2/27/2019	- WJS Review Notice from District Court regarding Hearing on Motion for Fees and Costs; review Docket	0.08 260.00/hr	20.80
3/13/2019	- WJS Review Notice from Supreme Court and Motion to Extend; conference with L Wolff; draft and file Response to Motion to Extend	0.35 260.00/hr	91.00
3/14/2019	- WJS Review Notices from Supreme Court; Research Dockets and Court calendar regarding District Court scheduled Hearings; emails to and from D Foley and C Wang regarding Hearing on Fees Motion	0.13 260.00/hr	32.50
	- LJW Review Motion to Extend Time; emails to and from W Smith; telephone call to W Smith regarding Motion	0.20 260.00/hr	52.00
3/15/2019	- LJW Review Reply to Opposition; emails to and from W Smith	0.08 260.00/hr	19.50
	- WJS Review from Supreme Court; review Reply filed by R Haskin; emails to and from L Wolff	0.08 260.00/hr	19.50
3/19/2019	- LJW Review Notice from Court	0.03 260.00/hr	6.50
4/10/2019	- WJS Preparation for and Appearance at Hearing of Fees and Costs Motions filed by other Plaintiffs; review Notice from Court regarding new Hearing Date before Judge Williams; emails to and from opposing counsel	0.35 260.00/hr	91.00
4/22/2019	- LJW Review filings regarding Extensions of Time; emails to and from W Smith; calendar Due Dates	0.08 260.00/hr	19.50
	- WJS Review Notice from District Court regarding Order on Stipulation to Continue Hearing; review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule; emails to and from L Wolff; draft and file Opposition to Motion to Continue	0.20 260.00/hr	52.00
4/23/2019	- LJW Review Motion and Opposition	0.03 260.00/hr	6.50
4/26/2019	- LJW Review Reply to Opposition	0.03 260.00/hr	6.50
	- KBC Conference with W Smith regarding Extension Motion and Opposition; calendar Hearing	0.05 260.00/hr	13.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2019 - WJS	Review Notice from Supreme Court regarding Lytle Reply Brief; email from D Foley regarding Issues for Hearing; conference with K Christensen regarding status of Case and Briefing Schedule	0.15 260.00/hr	39.00
5/2/2019 - LJW	Review Court Order regarding Extension; emails to and from W Smith	0.05 260.00/hr	13.00
- WJS	Review Notice from Supreme Court; review Order Denying Lytle Motion for Extension of Briefing Deadlines; emails to and from L Wolff; email to D Foley and C Wang	0.05 260.00/hr	13.00
5/7/2019 - WJS	Review Notice from District Court; review Motion to Set Hearing filed by Lytles	0.08 260.00/hr	19.50
5/15/2019 - WJS	Review emails from R Haskin; emails to and from and telephone call from D Foley regarding Hearing; review Court Pleadings and papers and preparation for Hearing	0.15 260.00/hr	39.00
5/16/2019 - WJS	Prepare for and attend Hearing at RJC (Judge Williams) on Motions for Fees and Costs (other Plaintiffs); case notes; Notices from Supreme Court regarding Lytle Opening Brief on Fees Appeal; emails to and from L Wolff	0.88 260.00/hr	227.50
- LJW	Review Opening Brief and Appendices	0.15 260.00/hr	39.00
5/17/2019 - WJS	Review Notice from District Court and Minute Order Granting Fee Motions	0.05 260.00/hr	13.00
5/20/2019 - LJW	Review Court Order	0.03 260.00/hr	6.50
- WJS	Review and annotate Lytle Opening Brief on Fees	0.38 260.00/hr	97.50
5/21/2019 - LJW	Telephone call to W Smith regarding Answering Brief; email to Court Clerk regarding Transcript; preparation of Answering Brief	0.38 260.00/hr	97.50
5/22/2019 - LJW	E-mails to and from Court Clerk	0.03 260.00/hr	6.50
5/28/2019 - KBC	Review Judgment Renewal Notice; emails to and from Attorney	0.05 260.00/hr	13.00
6/3/2019 - LJW	Preparation of Reply Brief; Research Standard of Review for Attorney's Fees and Costs on Appeal	0.70 260.00/hr	182.00
6/4/2019 - LJW	Research Law of the Case	0.40 260.00/hr	104.00
6/5/2019 - LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	1.00 260.00/hr	260.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019 - LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	0.88 260.00/hr	227.50
6/7/2019 - LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees	1.75 260.00/hr	455.00
6/10/2019 - LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees; telephone call to W Smith regarding Facts Section	1.25 260.00/hr	325.00
- WJS	Telephone call from L Wolff regarding Arguments for Appeal Brief	0.15 260.00/hr	39.00
6/11/2019 - LJW	Preparation of Reply Brief; review and revise Citations to Law and Record; review Transcript and add to Brief; preparation of Exhibits for Appendix; revise Citations to Appendix	1.75 260.00/hr	455.00
6/12/2019 - LJW	Preparation of Reply Brief; preparation of Fact Section; preparation of Appendix	1.05 260.00/hr	273.00
- WJS	Review and Redline draft Reply Brief; draft Answering Brief on Consolidated Appeals, Research	1.93 260.00/hr	500.50
6/13/2019 - LJW	Preparation of Appendix; Citations to Record; emails to and from W Smith	0.70 260.00/hr	182.00
- WJS	Research and draft Answering Brief; review Documents for Respondents' Appendix, preparation of Appendix	1.63 260.00/hr	422.50
6/14/2019 - WJS	Preparation of Respondents' Appendix; review and revise Answering Brief	0.45 260.00/hr	117.00
- LJW	Preparation of Appendix; revisions to Citations to Record; emails to and from W Smith; review Appellate Rules regarding Appendices and Documents	0.70 260.00/hr	182.00
6/17/2019 - WJS	Preparation of Table of Contents; review and revise Answering Brief; prepare Certifications; sign and prepare Brief and Appendix for filing	1.65 260.00/hr	429.00
6/18/2019 - WJS	Review Notice from Court; emails to and from L Wolff; review Notice form Court	0.05 260.00/hr	13.00
6/19/2019 - WJS	Review Order, make adjustments to Brief and prepare for filing; conference with Clerk regarding filing; review Court Notices regarding Acceptance of Filing	0.15 260.00/hr	39.00
- LJW	Review Appellate Motion	0.05 260.00/hr	13.00
7/15/2019 - WJS	Emails to and from R Haskin; review Agreement and Appellant filings	0.10 260.00/hr	26.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2019 - WJS	Email from R Haskin; review draft Extension Stipulation; review Notices from Supreme Court	0.03 260.00/hr	6.50
8/5/2019 - WJS	Emails to and from R Haskin; review and approve Stipulation	0.03 260.00/hr	6.50
8/19/2019 - WJS	Review Notice from Supreme Court; review Motion and Lytle Reply Brief; email to L Wolff	0.15 260.00/hr	39.00
8/20/2019 - LJW	Review Motions and Research Brief and Opposition	0.28 260.00/hr	71.50
8/21/2019 - WJS	Emails to and from L Wolff regarding Response to Lytle Reply Brief	0.05 260.00/hr	13.00
- LJW	Review Motions and Research Brief and Opposition; emails to and from W Smith	0.58 260.00/hr	149.50
8/22/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.65 260.00/hr	169.00
8/23/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.55 260.00/hr	143.00
8/26/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit; emails to and from W Smith	0.60 260.00/hr	156.00
- WJS	Review and revise Opposition and Countermotion; review Notice from Court	0.10 260.00/hr	26.00
8/27/2019 - LJW	Review and download Court Order	0.03 260.00/hr	6.50
9/3/2019 - LJW	Review and download Pleading	0.03 260.00/hr	6.50
9/4/2019 - WJS	Review Supreme Court filings from Lytles; emails to and from Counsel for Dismar regarding Stay of Execution and Fees Order	0.08 260.00/hr	19.50
9/30/2019 - WJS	Review Notice from Court regarding Appeal of Attorneys Fee Order; review Supreme Court Docket regarding Appeal	0.08 260.00/hr	19.50
10/1/2019 - LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
10/4/2019 - LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
- WJS	Review Notice from Court regarding Appeal of Boulden/Lamothe Fee Order	0.03 260.00/hr	6.50
10/22/2019 - WJS	Review Notice from District Court regarding Stipulation to Stay Execution, Posting on Bond; review Notice from Supreme court regarding Association of Counsel for Lytle	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2019	- WJS	Review Notices from Court regarding Appearance for Lytle and request for Transcripts	0.03 260.00/hr	6.50
12/4/2019	- KBC	Conference with W Smith regarding Hearing and Order Appointing HOA Receiver	0.06 260.00/hr	16.25
	- WJS	Telephone call from K Christensen regarding Appointment of Receiver over Association, review Case History and Minutes of Proceedings; email to K Christensen and email to Clerk	0.20 260.00/hr	52.00
1/13/2020	- LJW	Review Court order regarding Lamothe	0.03 260.00/hr	6.50
1/21/2020	- WJS	Review Order from Supreme Court; Research; draft Response	0.35 260.00/hr	91.00
1/24/2020	- WJS	Conference with K Christensen and K Kearn regarding Receiver; review Case file; email to K Christensen with documents; conference with K Christensen	0.30 260.00/hr	78.00
	- KBC	Review Orders; Research; telephone call from Client regarding HOA Judgment and Receiver correspondence; conference with Client and W Smith; review CCRs, Receiver Documents and preparation for conference with Client	0.48 260.00/hr	123.50
1/27/2020	- WJS	Research; conference with K Christensen; preparation for conference with Clients; telephone call from C Wang; conference with Clients; draft letter to Receiver; email to L Wolff	0.75 260.00/hr	195.00
	- KBC	Review Receiver letter and Orders; review Injunction; Research; conference with W Smith regarding Contempt, Fees, Motion to Vacate and Sanctions; conference with Clients regarding Demand and Motions	0.63 260.00/hr	162.50
1/28/2020	- DEM	Conference with W Smith; review letter to Receiver	0.18 260.00/hr	45.50
	- WJS	Emails to and from L Wolff; draft letter to Receiver; Research; conference with D Martin regarding revisions; preparation of Exhibits; email to K Christensen; conference with K Christensen	0.60 260.00/hr	156.00
	- KBC	Review letter to Receiver and Attorney; email to Attorney; conference with W Smith	0.06 260.00/hr	16.25
	- LJW	Review letter to Client and Court filings; email to W Smith	0.13 260.00/hr	32.50
1/29/2020	- LJW	E-mails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Emails to and from D Foley regarding letter from Receiver; revise letter to Receiver; email from J Gegen; email to Clients	0.13 260.00/hr	32.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2020	- LJW	E-mails to and from W Smith; preparation of Motion for Order to Show Cause	0.50 260.00/hr	130.00
	- WJS	Review follow-up letter from Receiver; conference with K Christensen; email to L Wolff regarding drafting Motion	0.05 260.00/hr	13.00
	- KBC	Review letter from Receiver canceling Meeting; conference with W Smith; conference with Client	0.06 260.00/hr	16.25
2/4/2020	- KBC	Conference with W Smith regarding Motion for OTSC and Contempt; emails to and from Attorney regarding Motion; review Hearing Notice	0.06 260.00/hr	16.25
	- WJS	Review notification from Court; review Motion to Reduce to Judgment from old Case; conference with K Christensen; Research Dockets; conference with L Wolff regarding Motion	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith; preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.90 260.00/hr	234.00
2/5/2020	- WJS	E-mail from J Gegen; review letters	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.38 260.00/hr	97.50
2/6/2020	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.28 260.00/hr	71.50
2/10/2020	- WJS	E-mails to and from D Foley; review Renewed Motion to Appoint Receiver; messages to and from L Wolff; Research	0.40 260.00/hr	104.00
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.53 260.00/hr	136.50
2/11/2020	- KBC	Calendar Hearing; conference with W Smith; review Motion	0.03 260.00/hr	6.50
	- WJS	Messages to and from L Wolff regarding Receiver Report	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	1.00 260.00/hr	260.00
2/12/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearn, Zobrist and Gegan; preparation of Affidavit for W Smith	1.93 260.00/hr	500.50
2/13/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearn, Zobrist and Gegen; preparation of Affidavit for W Smith	1.08 260.00/hr	279.50

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2020	- WJS E-mail from L Wolff; review and revise Motion for Order to Show Cause	0.25 260.00/hr	65.00
	- LJW Preparation of Motion to Intervene	1.03 260.00/hr	266.50
2/18/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.63 260.00/hr	162.50
2/19/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.80 260.00/hr	208.00
2/20/2020	- LJW Preparation of Motion to Strike Order	0.80 260.00/hr	208.00
2/21/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	0.80 260.00/hr	208.00
	- LJW Preparation of Motion to Intervene	0.55 260.00/hr	143.00
2/22/2020	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/24/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	1.05 260.00/hr	273.00
	- LJW Preparation of Motion to Intervene	0.73 260.00/hr	188.50
2/25/2020	- WJS Drafting and revisions to Motion for Order to Show Cause; Research; email to L Wolff	1.30 260.00/hr	338.00
	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/26/2020	- WJS E-mails to and from L Wolff	0.03 260.00/hr	6.50
	- LJW Preparation of Motion to Intervene	0.53 260.00/hr	136.50
3/2/2020	- WJS Review and revise Motion to Intervene; Research; review Notice from Nevada Supreme Court; review Order Submitting for Decision; draft Affidavits; review Notice from NSC; review Order of Affirmance; conference with K Christensen; revisions to Motion for Order to Show Cause and Motion to Intervene	1.50 260.00/hr	390.00
3/3/2020	- WJS E-mails to and from L Wolff; review and revise Motions and Affidavits; emails to Client regarding Affidavits; preparation of Exhibits; meet with Zobrist and Kearl; telephone call from L Wolff	0.70 260.00/hr	182.00
	- LJW Review Affirmance Order from Supreme Court; telephone call to W Smith	0.10 260.00/hr	26.00

September Trust, dated March 23, 1972

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		Hrs/Rate	Amount
3/4/2020	- WJS	0.65 260.00/hr	169.00
	Emails to and from D Foley and C Wang; Research Court Rules; draft Bill of Costs on Appeal; Research Supersedeas Bond; notes to file; meet with Julie Gegen regarding Affidavits; revisions to Motions; prepare Motions and Exhibits for filing		
3/5/2020	- WJS	0.18 260.00/hr	45.50
	Review Notices from Court regarding Hearings, calendar and send emails to Counsel; draft Bill of Costs; finalize and prepare for filing; review Notices from Supreme Court		
3/6/2020	- KBC	0.09 260.00/hr	22.75
	Conference with W Smith regarding proposed Motion and Hearing Stipulation and Issues; review email from new opposing counsel		
	- WJS	0.20 260.00/hr	52.00
	Review Notice; review Joinders filed by C Wang and D Foley; email to Clients; email from D Waite regarding Stipulation to Intervene; conference with K Christensen		
3/9/2020	- WJS	0.60 260.00/hr	156.00
	Research Intervention Rules; telephone call from D Waite regarding Stipulation to Intervene; telephone call from C Wang; telephone call from R Dismar; email from D Waite and review and redline draft Stipulation; review Court Notices		
	- LJW	0.03 260.00/hr	6.50
	Review Pleadings; email to W Smith		
3/10/2020	- KBC	0.10 260.00/hr	26.00
	Conference with W Smith regarding requested Stipulation to Intervene, OTSC, Attorney's Fees and Receiver Issues; review Attorney emails		
	- WJS	0.35 260.00/hr	91.00
	E-mails from D Waite regarding Settlement Offer and Stipulation on Motion to Intervene; conference with K Christensen; draft revisions to Stipulation; emails to and from L Wolff; emails to and from D Waite; telephone call from D Foley; conference with Clerk regarding Fees Statements		
	- LJW	0.05 260.00/hr	13.00
	Review revised Stipulation and Order; emails to and from W Smith		
3/11/2020	- WJS	0.40 260.00/hr	104.00
	E-mails from D Waite; review and analysis of Stipulation redline; preparation for Status Hearing in Receiver Action; check Docket; email to Counsel for Receiver		
	- LJW	0.78 260.00/hr	201.50
	Preparation of Motion to Set Aside Order		
3/12/2020	- KBC	0.08 260.00/hr	19.50
	Conference with W Smith; preparation of Motion to Vacate Order; review D Waitz letter to Receiver		
	- ELJ	0.65 260.00/hr	169.00
	Meeting with W Smith regarding opposing Arguments (.7); Research Caselaw on Unclean Hands and Fraud on Court; email to W Smith and L Wolff with Caselaw and Arguments		
	- WJS	1.20 260.00/hr	312.00
	Preparation for Hearing; Appearance at Status Hearing in Receivership Case; telephone call to L Wolff regarding Motion; email from Receiver's Counsel, review January Status Report; letter from D Waite - analysis; conference with Clerk regarding		

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020	- LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
	- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020	- WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
	- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
	- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020	- WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020	- WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020	- LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020	- WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020	- WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
	- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2020	- WJS Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2020	- WJS Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff	0.28 260.00/hr	71.50
	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date	1.48 260.00/hr	383.50
4/11/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.38 260.00/hr	97.50
4/13/2020	- WJS Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley	2.38 260.00/hr	617.50
	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall	1.75 260.00/hr	455.00
4/14/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk	1.85 260.00/hr	481.00
	- WJS Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff	1.25 260.00/hr	325.00
4/15/2020	- WJS E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff	1.20 260.00/hr	312.00
	- LJW Review filings and emails; email to W Smith	0.05 260.00/hr	13.00
4/16/2020	- DEM Research recent Nevada HOA Caselaw; email to W Smith	0.25 260.00/hr	65.00
4/17/2020	- WJS E-mail from D Martin and review new Supreme Court Opinion	0.10 260.00/hr	26.00
4/20/2020	- LJW Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond	0.30 260.00/hr	78.00

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2020	- WJS Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020	- WJS Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
	- LJW Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020	- KBC Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
	- WJS Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
	- LJW Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020	- LJW Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
	- WJS Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020	- WJS Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
	- LJW Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020	- WJS E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020	- LJW Review emails and revised Order	0.05 260.00/hr	13.00

\$9,942.25
* 4
\$ 39,769.00

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2020	- LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
For professional services rendered			144.28	\$37,350.80
Additional Charges :				
			<u>Qty/Price</u>	
5/24/2018	- N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018	- LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018	- N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018	- N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018	- N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018	- N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018	- N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018	- N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018	- N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018	- N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018	- N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018	- N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018	- N	Clark County District Court Download Fee	0.25 2.00	0.50

September Trust, dated March 23, 1972

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		<u>Qty/Price</u>	<u>Amount</u>
8/31/2018 - N	WestLaw Research 8/1-8/31/18	0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)	0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs	0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18	0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay	0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18	0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider	0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18	0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider	0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)	0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)	0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019	0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal	0.25 443.54	110.89
6/30/2019 - N	WestLaw Research	0.25 301.54	75.39
8/31/2019 - N	WestLaw Research	0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020	0.25 31.81	7.95

September Trust, dated March 23, 1972

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			<u>Qty/Price</u>	<u>Amount</u>
2/4/2020 - N	Clark County District Court Document Download - Order on Receivership		0.25 5.50	1.38
2/5/2020 - N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver		0.25 101.97	25.49
2/11/2020 - N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses		0.25 19.00	4.75
2/29/2020 - N	WestLaw Research - February 2020		0.25 528.58	132.15
3/4/2020 - N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders		0.25 3.50	0.88
- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure		0.25 356.79	89.20
3/11/2020 - N	Court Parking Expense at Hearing		0.25 6.00	1.50
3/26/2020 - N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order		0.25 3.50	0.88
3/31/2020 - N	WestLaw Research (March 2020)		0.25 683.39	170.85
4/10/2020 - N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)		0.25 3.50	0.88
4/13/2020 - N	District Court Filing Fee - Notice to Appear (A-18-775843-C)		0.25 3.50	0.88
4/14/2020 - N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)		0.25 3.50	0.88
4/15/2020 - N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)		0.25 51.00	12.75
4/30/2020 - N	WestLaw Research April 2020		0.25 250.87	62.72

September Trust, dated March 23, 1972

		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	144.28	\$38,387.07

000358

000358

Exhibit B

Exhibit B

Waite, Dan R.

From: Waite, Dan R. <DWaite@lrrc.com>
Sent: Friday, March 6, 2020 4:23 PM
To: kbc@cjmlv.com; wes@cjmlv.com; ljw@cjmlv.com
Cc: Richard Haskin
Subject: Lytle Trust v. Association (Receivership Action)
Attachments: Prop Stip and Order Allowing Intervention.PDF; 3bclean-control.bin

Dear Counsel:

This afternoon, I associated into the Receivership action (Case No. A-18-775843-C) as co-counsel (with Rich Haskin) for the Plaintiff Lytle Trust. While there is much (almost everything) the Lytle Trust disagrees with in your Motion to Intervene, the Lytle Trust welcomes your participation in the Receivership action. Therefore, the Lytle Trust is willing to stipulate to your intervention, and then you can proceed to file your referenced motion to amend or set aside the Receivership Order. I assume (but please confirm) this is acceptable to the proposed intervenors.

To that end, attached is a draft Stipulation and Order. Please let me know if you have any suggested changes. Or, if no changes, please execute and return to me for execution and submission to the Court for consideration of the Order. Thanks and best regards for a great weekend,

Dan

Dan R. Waite
 Partner
 702.474.2638 office
 702.949.8398 fax
dwaite@lrrc.com

Lewis Roca
 ROTHGERBER CHRISTIE

Lewis Roca Rothgerber Christie LLP
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 Las Vegas, Nevada 89169
lrrc.com



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 AMPLIFIED**

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 to you, matters to us.

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1 **SAO**
 2 DAN R. WAITE, ESQ.
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 4 DWaite@lrrc.com
 5 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**
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 Telephone: 702-949-8200
 Facsimile: 702-949-8398

6 *Attorneys for Plaintiffs, Trudi Lee Lytle and*
 7 *John Allen Lytle, as Trustees of the Lytle Trust*

8 **DISTRICT COURT**
 9 **CLARK COUNTY, NEVADA**

10 TRUDI LEE LYTLE AND JOHN ALLEN
 11 LYTLE, AS TRUSTEES OF THE LYTLE
 12 TRUST,

13 Plaintiff,

14 v.

15 ROSEMERE ESTATES PROPERTY
 16 OWNERS' ASSOCIATION; ,

17 Defendants,

Case No.: A-18-775843-C

Dept. No.: 31

**STIPULATION AND ORDER ALLOWING
 INTERVENTION**

18 Plaintiff Trudi Lee Lytle and John Allen Lytle, as Trustees of the Lytle Trust, by and
 19 through their counsel of record, Dan R. Waite of the law firm of Lewis Roca Rothgerber Christie
 20 LLP and Richard Haskin, Esq. of Gibbs, Giden, Locher, Turner, Senet & Wittbrodt, LLP, and the
 21 Proposed Intervenors, as defined below, by and through their counsel of record, Kevin B.
 22 Chistensen of Christensen James & Martin, hereby stipulate that each of the following (1) are
 23 current members of the Defendant Rosemere Estates Property Owners Association, (2) have
 24 expressed a desire to intervene in this action, and (3) should be allowed to intervene in this action
 (the following are the "Proposed Intervenors"):

- 25 1. September Trust, dated March 23, 1972 ("September Trust"),
- 26 2. Gerry R. Zobrist and Jolin G. Zobrist, as Trustees of the Gerry R. Zobrist and Jolin
- 27 G. Zobrist Trust ("Zobrist Trust"),
- 28

3. Raynoldo G. Sandoval and Julie Marie Sandoval Gegen, as Trustees of the Raynaldo G. and Evelyn A. Sandoval Joint Living and Devolution Trust Dated May 27, 1992 ("Sandoval Trust"), and

4. Dennis A Gegen and Julie S. Gegen, Husband and Wife, as Joint Tenants ("Gegens").

DATED this ____ day of March, 2020

DATED this __ day of March, 2020

LEWIS ROCA ROTHGERBER CHRISTIE
LLP

CHRISTENSEN JAMES & MARTIN

By: _____

By: _____

DAN R. WAITE (4078)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
*Attorneys for Plaintiffs, Trudi Lee Lytle
and John Allen Lytle, as Trustees of the
Lytle Trust*

KEVIN B. CHRISTENSEN (175)
WESLEY J. SMITH (11871)
LAURA J. WOLFF (6869)
7440 W. Sahara Ave.
Las Vegas, NV 89117
*Attorneys for [Proposed] Intervenors
September Trust, Zobrist Trust, Sandoval
Trust and Dennis & Julie Gegen*

RICHARD HASKIN (11592)
GIBBS, GIDEN, LOCHER, TURNER,
SENET & WITTBRODT, LLP
1140 N. Town Center Drive
Las Vegas, Nevada 89144
*Attorneys for Plaintiffs, Trudi Lee Lytle
and John Allen Lytle, as Trustees of the
Lytle Trust*

[ORDER ON NEXT PAGE]

ORDER

IT IS HEREBY ORDERED that the foregoing Stipulation is approved. The September Trust, Zobrist Trust, Sandoval Trust, and Gegens may intervene into this action as defendants in intervention.

IT IS FURTHER ORDERED that the hearing on the Motion to Intervene scheduled for April 7, 2020, at 9:00 a.m. is vacated as moot.

Dated this _____ day of March, 2020.

DISTRICT COURT JUDGE

Respectfully submitted by:

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: _____

DAN R. WAITE (4078)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

RICHARD HASKIN (11592)
GIBBS, GIDEN, LOCHER, TURNER, SENET & WITTBRODT, LLP
1140 N. Town Center Drive
Las Vegas, Nevada 89144
Attorneys for Plaintiffs, Trudi Lee Lytle and John Allen Lytle, as Trustees of the

Exhibit C

000364

000364

Exhibit C

Waite, Dan R.

From: Waite, Dan R. <DWaite@lrrc.com>
Sent: Monday, March 9, 2020 10:11 AM
To: kbc@cjmlv.com; wes@cjmlv.com; ljw@cjmlv.com
Cc: Richard Haskin
Subject: RE: Lytle Trust v. Association (Receivership Action)
Attachments: Stip and Order Allowing Motion of NonParty Seeking Intervention(110680812.1).docx; 3bclean-control.bin

Wes,

Good talking with you this morning. Attached is the draft Stip in Word format. Because I'm aware of the emotional aspects of this case between our respective clients, I purposely tried to avoid such by drafting the Stip in a very short, matter-of-fact sort of way (i.e., intentionally non-emotional). So, as you suggest changes to the draft I would respectfully ask that you keep such in mind. In other words, I'm not sure the reasons why you want to intervene are necessary to a Stipulation agreeing to the intervention (e.g., depending on what you want to recite in the Stipulation may necessitate rebuttal recitations from the Lytle Trust; effectively turning the Stip into a mini-motion and opposition, which I think is what we want to avoid). My hope is to keep this simple and "vanilla" and then you can frame all the issues and allegations in your anticipated motion to revise/set aside the Receiver Order. BTW, I don't have any problem with you coming to the status hearing on Thursday and giving the judge a head's up of what's coming (even if the Order on the Stipulation has not then been entered).

Thanks Wes—I look forward to working with you,

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Dan R. Waite
 Partner
 702.474.2638 office
 702.949.8398 fax
dwaite@lrrc.com

Lewis Roca
 ROTHGERBER CHRISTIE

Lewis Roca Rothgerber Christie LLP
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, Nevada 89169
lrrc.com

From: Waite, Dan R.
Sent: Friday, March 6, 2020 4:23 PM
To: kbc@cjmlv.com; wes@cjmlv.com; ljw@cjmlv.com
Cc: Richard Haskin <rhaskin@gibbsgiden.com>
Subject: Lytle Trust v. Association (Receivership Action)

Dear Counsel:

This afternoon, I associated into the Receivership action (Case No. A-18-775843-C) as co-counsel (with Rich Haskin) for the Plaintiff Lytle Trust. While there is much (almost everything) the Lytle Trust disagrees with in your Motion to Intervene, the Lytle Trust welcomes your participation in the Receivership action. Therefore, the Lytle Trust is willing to stipulate to your intervention, and then you can proceed to file your referenced motion to amend or set aside the Receivership Order. I assume (but please confirm) this is acceptable to the proposed intervenors.

To that end, attached is a draft Stipulation and Order. Please let me know if you have any suggested changes. Or, if no changes, please execute and return to me for execution and submission to the Court for consideration of the Order. Thanks and best regards for a great weekend,

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Exhibit D

000367

Exhibit D

Waite, Dan R.

From: Wesley Smith <wes@cjmlv.com>
Sent: Tuesday, March 10, 2020 11:02 AM
To: Waite, Dan R.; Kevin Christensen; Laura Wolff
Cc: Richard Haskin
Subject: Re: Lytle Trust v. Association (Receivership Action)

[EXTERNAL]

Dan,

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Wes Smith

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 Fax (702) 255-0871
wes@cjmlv.com

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Exhibit E

000371

Exhibit E

Waite, Dan R.

From: Waite, Dan R.
Sent: Tuesday, March 10, 2020 11:24 AM
To: Wesley Smith; Kevin Christensen; Laura Wolff
Cc: Richard Haskin
Subject: RE: Lytle Trust v. Association (Receivership Action)

Wes, I'm fine moving the hearing date (but I have a hearing on April 14th so we'll need to find another date)—however, I'm trying to figure out why you or I or the Court need to waste any time on the intervention issue when we are willing to stipulate to the relief you're requesting. The Court isn't going to decide anything at the time it hears your intervention motion other than whether to allow intervention or not (and, if you just want to give the judge a head's up of what's coming, I've already said I have no issue with you showing up at the status hearing this Thursday and advising the Court of such; indeed, I may do so whether you're there or not). Thus, not stipulating now to the intervention will both multiply the proceedings (and related expenses for all involved) and actually delay the Court's resolution of your underlying concerns (because, if we stipulate now, you could file your motion to amend/set aside the Receiver order tomorrow whereas if we don't stipulate, the earliest you'll be able to file is after the April 7th hearing). In other words, the Court will actually hear and decide your issues about a month sooner if we stipulate to the intervention. As mentioned yesterday, I'm interested in having the Court resolve your concerns as quickly as possible (albeit, we want the Court to resolve those concerns differently).

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Cc: Richard Haskin <rhaskin@gibbsgiden.com>
Subject: Re: Lytle Trust v. Association (Receivership Action)

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000375

000375

Exhibit F

000376

Exhibit F

Waite, Dan R.

From: Wesley Smith <wes@cjmlv.com>
Sent: Tuesday, March 10, 2020 12:43 PM
To: Waite, Dan R.; Kevin Christensen; Laura Wolff
Cc: Richard Haskin
Subject: Re: Lytle Trust v. Association (Receivership Action)
Attachments: Stip and Order Allowing Motion of NonParty Seeking Intervention(110680812.1).wes
redline.docx

[EXTERNAL]

Dan,

Ulterior motive? NRCP has specific requirements that must be met for intervention to be permitted. A "vanilla" stipulation does not address those requirements. One of them is that the current parties do not adequately represent the interests of the proposed intervenor. That requirement is met is because the Lytle Trust did not inform the court about the prior orders we believe protect my clients. The Court should be informed of those facts now to understand why intervention is appropriate and necessary. Here is a draft of the stipulation, which includes our bases for intervention, followed by a statement that your client disagrees with the allegations but agrees that intervention should be permitted.

Wes Smith

Christensen James & Martin
7440 W. Sahara Ave.
Las Vegas, NV 89117
Tel. (702) 255-1718
Fax (702) 255-0871
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Subject: Re: Lytle Trust v. Association (Receivership Action)

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1 **SAO**

2 DAN R. WAITE, ESQ.

3 Nevada Bar No. 4078

4 DWaite@lrrc.com

5 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

6 3993 Howard Hughes Parkway, Suite 600

7 Las Vegas, Nevada 89169

8 Telephone: 702-949-8200

9 Facsimile: 702-949-8398

10 *Attorneys for Plaintiffs, Trudi Lee Lytle and*11 *John Allen Lytle, as Trustees of the Lytle Trust*12 **DISTRICT COURT**13 **CLARK COUNTY, NEVADA**14 TRUDI LEE LYTLE AND JOHN ALLEN
15 LYTLE, AS TRUSTEES OF THE LYTLE
16 TRUST,

17 Plaintiff,

18 v.

19 ROSEMER ESTATES PROPERTY
20 OWNERS' ASSOCIATION;,

21 Defendants,

Case No.: A-18-775843-C

Dept. No.: 31

22 **STIPULATION AND ORDER ALLOWING
23 INTERVENTION**

24 Plaintiff Trudi Lee Lytle and John Allen Lytle, as Trustees of the Lytle Trust ("Plaintiff"),

25 by and through their counsel of record, Dan R. Waite of the law firm of Lewis Roca Rothgerber

26 Christie LLP and Richard Haskin, Esq. of Gibbs, Giden, Locher, Turner, Senet & Wittbrodt, LLP,

27 and the September Trust, dated March 23, 1972 ("September Trust"), Gerry R. Zobrist and Jolin28 G. Zobrist, as Trustees of the Gerry R. Zobrist and Jolin G. Zobrist Family Trust ("Zobrist Trust"),

Raynaldo G. Sandoval and Julie Marie Sandoval Gegen, as Trustees of the Raynaldo G. and

Evelyn A. Sandoval Joint Living and Devolution Trust Dated May 27, 1992 ("Sandoval Trust"),

and Dennis A. Gegen and Julie S. Gegen, Husband and Wife, as Joint Tenants ("Gegen")

(hereafter September Trust, Zobrist Trust, Sandoval Trust and Gegen are collectively referred to as

the ("Proposed Intervenor"), as defined below, by and through their counsel of record, ~~Kevin B.~~

Christensen Wesley Smith of Christensen James & Martin, hereby stipulate that;

110680812.1

Formatted: Justified

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1 1. each of the following (1) Pursuant to NRCP 24(a)(2), the Proposed Intervenor
2 have filed a Motion to Intervene in this action which sets forth in detail the Proposed Intervenor's
3 bases for intervention, including the following allegations:

4 a. The Proposed Intervenor owns real property within the Rosemere subdivision
5 and claim an interest in their individual real property as it relates to the
6 appointment, duties, and rights of a receiver in this action;

7 b. The Proposed Intervenor each received a letter from the Receiver, Kevin
8 Singer, seeking to collect from the Proposed Intervenor or their properties
9 certain judgments obtained by the Plaintiff Lytle Trust against the Defendant
10 Rosemere Estates Property Owners' Association ("Association");

11 c. The Proposed Intervenor are each protected by a permanent injunction issued
12 in May 2018 in Case No. A-17-765372-C ("May 2018 Order") that expressly
13 prohibits the Plaintiff Lytle Trust from enforcing against the Proposed
14 Intervenor's or their properties any judgment obtained against the Defendant
15 Association;

16 d. The May 2018 Order was affirmed by the Nevada Supreme Court on March 2,
17 2020;

18 e. The Plaintiff Lytle Trust failed to inform the Court about the permanent
19 injunction issued in favor of the Proposed Intervenor;

20 f. The Plaintiff Lytle Trust failed to inform the Court about another permanent
21 injunction issued in favor of other similarly situated property owners in the
22 Rosemere subdivision, which was also affirmed by the Nevada Supreme Court;

23 g. The Plaintiff Lytle Trust failed to inform the Court about other essential facts
24 and circumstances that directly bear on the appointment of a receiver in this
25 matter;

26 h. The Plaintiff Lytle Trust has violated the permanent injunction by seeking
27 appointment of the Receiver and by the Receiver's efforts to collect the
28 judgments from the Proposed Intervenor; and

- 1 i. The Order Appointing a Receiver of Defendant Rosemere Property Owners
2 Association ("Receivership Order") must be amended or rescinded to avoid
3 further violations of the permanent injunctions and Order of Affirmance.
- 4 2. Plaintiff Lytle Trust does not agree with the Proposed Intervenors' allegations set
5 forth in the Motion to Intervene or herein, but does agree that Proposed Intervenors should be
6 permitted to intervene;
- 7 3. The Proposed Intervenors have claimed an interest in the subject matter of this
8 action
- 9 4. Neither Plaintiff nor Defendant Association adequately represents the interests of
10 the Proposed Intervenors; are current members of the Defendant Rosemere Estates Property
11 Owners Association, (2) have expressed a desire to intervene in this action and
12 1. Pursuant to NRCP 24(a)(2), Proposed Intervenors, and (3) should must be allowed
13 to intervene in this action (the following are the "Proposed Intervenors");
- 14 5. _____
- 15 1. September Trust, dated March 23, 1972 ("September Trust");
16 2. Gerry R. Zobrist and Jolin G. Zobrist, as Trustees of the Gerry R. Zobrist and Jolin G.
17 Zobrist Trust ("Zobrist Trust");
18 3. Raynaldo G. Sandoval and Julie Marie Sandoval Gegen, as Trustees of the Raynaldo G.
19 and Evelyn A. Sandoval Joint Living and Devolution Trust Dated May 27, 1992 ("Sandoval
20 Trust"); and
21 4. Dennis A. Gegen and Julie S. Gegen, Husband and Wife, as Joint Tenants ("Gegens").

23 DATED this ____ day of March, 2020

23 DATED this ____ day of March, 2020

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1 LEWIS ROCA ROTHGERBER CHRISTIE
2 LLP

CHRISTENSEN JAMES & MARTIN

3 By: _____
4 DAN R. WAITE (4078)
5 3993 Howard Hughes Pkwy, Suite 600
6 Las Vegas, NV 89169-5996
7 *Attorneys for Plaintiffs, Trudi Lee Lytle
8 and John Allen Lytle, as Trustees of the
9 Lytle Trust*

By: _____
KEVIN B. CHRISTENSEN (175)
WESLEY J. SMITH (11871)
LAURA J. WOLFF (6869)
7440 W. Sahara Ave.
Las Vegas, NV 89117
*Attorneys for [Proposed] Intervenor
September Trust, Zobrist Trust, Sandoval
Trust and Dennis & Julie Gegen*

8 RICHARD HASKIN (11592)
9 GIBBS, GIDEN, LOCHER, TURNER,
10 SENET & WITTBRODT, LLP
11 1140 N. Town Center Drive
12 Las Vegas, Nevada 89144
13 *Attorneys for Plaintiffs, Trudi Lee Lytle
14 and John Allen Lytle, as Trustees of the
15 Lytle Trust*

[ORDER ON NEXT PAGE]

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

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Dated this _____ day of March, 2020.

DISTRICT COURT JUDGE

LEWIS ROCA ROTHGERBER CHRISTIE LLP

RICHARD HASKIN (11592)
GIBBS, GIDEN, LOCHER, TURNER, SENET & WITTBRODT, LLP
1140 N. Town Center Drive
Las Vegas, Nevada 89144
Attorneys for Plaintiffs, Trudi Lee Lytle and John Allen Lytle, as Trustees of the

Exhibit G

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Exhibit G

History of Billing

Gerry R. Zobrist and Jolin G. Zobrist Family Trust
1901 Rosemere Court
Las Vegas, NV 89117
Attn: Gerry R. Zobrist

Professional Services

		Hrs/Rate	Amount
5/23/2018	- LJW Preparation of Memorandum of Costs	0.43 260.00/hr	110.50
5/24/2018	- LJW Conference with W Smith regarding Fees and Costs; review Bills to redact Privileged Information; conference with Clerk	0.48 260.00/hr	123.50
	- WJS Email from L Wolff regarding Motion for Fees; review signed Order; conference with Clerk regarding filing Order; preparation of Notice of Entry of Order; review draft Notice of Entry; conference with L Wolff regarding Motion for Fees, review Billing Statements	0.25 260.00/hr	65.00
5/28/2018	- LJW E-mails to and from Clerk regarding Notice	0.03 260.00/hr	6.50
5/29/2018	- LJW Preparation of Motion for Fees; preparation of Declaration for Fees; preparation of Exhibits	0.63 260.00/hr	162.50
5/30/2018	- LJW Preparation of Declaration for Fees; preparation of Exhibits for Motion; review Billings for Privilege; telephone call to Clerk regarding Redaction of Privileged Information; preparation of Spreadsheet calculating Fees and Costs	0.58 260.00/hr	149.50
5/31/2018	- DEM Preparation of documents for Disclosure in Motion for Fees; conference with W Smith	0.13 260.00/hr	32.50
	- LJW Preparation of Declaration for Fees; preparation of Exhibits for Motion; preparation of Spreadsheet calculating Fees and Costs	0.38 260.00/hr	97.50
	- WJS Review redacted Fee Statements; prepare for filing; review and redline draft Motion for Fees, associated Research and Citation Check; review and redline Declaration in Support of Fees Motion	1.38 260.00/hr	357.50

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

Page 2

			Hrs/Rate	Amount
6/1/2018	- WJS	Revise Motion, Declaration and Memo of Costs; conference with Clerk regarding Fee Statements; email to L Wolff; review Rules regarding Timing	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith regarding Motion for Attorney's Fees and Costs; telephone call with Clerk regarding redaction of Bills; review revisions to Motion	0.13 260.00/hr	32.50
6/4/2018	- WJS	Emails to and from L Wolff; revise Fees Motion and related Documents	0.20 260.00/hr	52.00
	- LJW	Review and revise Memorandum of Costs, Declaration of W. Smith, Motion for Attorney's Fees and Costs, Exhibits and update Summary of Fees and Costs; telephone call to Clerk regarding redaction and filing updated Billing Summary	0.55 260.00/hr	143.00
6/5/2018	- WJS	Review Notices from Court; review filings; calendar Hearing Date; email to L Wolff regarding Notice of Hearing	0.08 260.00/hr	19.50
6/6/2018	- LJW	Preparation of Notice of Hearing; emails to and from W Smith regarding Notice; emails to and from Clerk regarding Notice; review filed Pleadings	0.15 260.00/hr	39.00
6/11/2018	- LJW	Review Motion to Retax Costs; email to W Smith regarding Motion; email to Clerk regarding Receipts; Research Evidence of Costs	0.43 260.00/hr	110.50
6/12/2018	- LJW	Research Memorandum and Evidence of Costs; telephone call to Clerk regarding Receipts and Spreadsheet; preparation of Opposition to Motion to Retax Costs	0.48 260.00/hr	123.50
6/13/2018	- WJS	Email from R Haskin; emails to and from L Wolff; review NRAP; emails to and from R Haskin regarding Request for Stipulation on Appeal Reply	0.20 260.00/hr	52.00
	- LJW	Preparation of Opposition to Motion to Retax Costs; emails to and from W Smith regarding request to file Reply; Research Issues related to Replies to Amicus Brief; telephone call with Clerk regarding Costs	0.58 260.00/hr	149.50
6/14/2018	- LJW	Research Costs Awarded by District Courts and preparation of Opposition to Motion to Retax Costs	0.33 260.00/hr	84.50
6/15/2018	- WJS	Emails to and from L Wolff; review and revise Opposition to Motion to Retax Costs and Support Declarations; telephone call from L Wolff; conference with K Christensen	0.38 260.00/hr	97.50
	- LJW	Preparation of Opposition to Motion to Retax Costs; revisions to Motion; preparation of Declaration for Opposition; preparation of Exhibits for Opposition; emails to and from W Smith; emails to and from Clerk	0.95 260.00/hr	247.00
6/19/2018	- WJS	Review Notices from Court; review Notice of Appeal and Appeal Statement filed by Lytles; review Property Records regarding Recorded Releases; review NRAP regarding timing and Appeal; review Notice from Supreme Court; review Motion for Leave to File	0.35 260.00/hr	91.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
		Response to Amicus Brief; email to D Foley and C Wang regarding Motion and Appeal Issues		
6/19/2018	- KBC	Conference with W Smith regarding Appeal Notice and Fees Motion; calendar Brief Due Dates	0.05 260.00/hr	13.00
6/20/2018	- WJS	E-mails to and from D Foley; draft Opposition to Motion for Leave to Respond to Amicus Brief; email to D Foley	0.55 260.00/hr	143.00
	- LJW	Review Motion to File Amicus Brief; emails to and from W Smith regarding Amicus	0.10 260.00/hr	26.00
6/22/2018	- LJW	Review Releases	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court; review Opposition to Motion for Fees; email to L Wolff regarding Reply; review Notice from Supreme Court; review Response to Motion to Respond to Amicus Brief (filed by Foley)	0.10 260.00/hr	26.00
6/25/2018	- LJW	Review Pleadings; emails to and from W Smith regarding Motion	0.05 260.00/hr	13.00
6/26/2018	- KBC	Conference with W Smith regarding Fees Motion, Appeal Brief, Consolidation and Client conference for Instructions	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court regarding Docketing of Notice of Appeal; review Record Transmitted by District Court; conference with K Christensen; email to Clients	0.23 260.00/hr	58.50
6/27/2018	- LJW	Review Opposition; preparation of Reply to Opposition	0.18 260.00/hr	45.50
6/28/2018	- LJW	Research Arbitration Requirement and CC&Rs; preparation of Reply to Opposition	0.73 260.00/hr	188.50
	- WJS	Review Notice from District Court; review Dismar's Motion for Summary Judgment; emails to and from L Wolff	0.08 260.00/hr	19.50
6/29/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees	0.38 260.00/hr	97.50
7/2/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; Research NRS 38.310	1.18 260.00/hr	305.50
	- KBC	Review Dismar's Motion for Summary Judgment; conference with Clerk; calendar Hearing	0.10 260.00/hr	26.00
7/3/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply	0.85 260.00/hr	221.00
7/5/2018	- WJS	Email from and telephone calls to and from L Wolff regarding Arguments for Reply Brief; review and revise Reply on Motion for Fees and Costs; Research; emails to and from L Wolff	0.45 260.00/hr	117.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2018 - LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply; telephone call to W Smith; email to Clerk regarding filing; Research Liens and Possessor Interests; Research Lytles Defenses regarding recording Liens	0.83 260.00/hr	214.50
7/6/2018 - LJW	Review Order; calendar Hearing Date	0.03 260.00/hr	6.50
- WJS	Review Notice from Court regarding Rescheduled Hearing; emails to and from R Haskin and C Wang regarding Hearing Date	0.05 260.00/hr	13.00
7/20/2018 - LJW	E-mails to and from W Smith regarding Transcript; Research on Appellate Rules and Transcripts; email to opposing counsel	0.38 260.00/hr	97.50
7/23/2018 - WJS	Review Notice from Supreme Court; review Order Denying Motion to Respond to Amicus Brief	0.08 260.00/hr	19.50
7/24/2018 - WJS	E-mail from Counsel for Lytle; review Hearing Transcripts	0.10 260.00/hr	26.00
7/25/2018 - WJS	Review Motions, Oppositions, Replies and Exhibits related to Fees and Costs; prepare for Hearing on Motion	0.45 260.00/hr	117.00
7/26/2018 - WJS	Prepare for, attend and present Oral Argument at Hearing on Motion for Attorney's Fees and Costs; conference with C Wang regarding Dismans Motion for Summary Judgment; review Docket and Opposition; conference with E James regarding Hearing; telephone call from C Wang	1.03 260.00/hr	266.50
7/27/2018 - KBC	Review Hearing Notice; calendar Hearing on Motion for Summary Judgment; conference with W Smith	0.03 260.00/hr	6.50
7/30/2018 - LJW	Review Case Statement; emails to and from opposing counsel; emails to W Smith; review Orders and Motions	0.15 260.00/hr	39.00
8/2/2018 - LJW	Review and download Pleadings filed by Dismans and Lytles	0.13 260.00/hr	32.50
8/6/2018 - LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
- WJS	Review Court Notices and Reply Brief from Dismans; emails to and from L Wolf regarding Hearing	0.23 260.00/hr	58.50

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

Page 5

		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2018	- WJS E-mails to and from L Wolff and D Foley regarding Boulden & Lamothe Fee Motion; review Transcripts; preparation for Hearing	0.33 260.00/hr	84.50
	- LJW Review Court Record regarding Attorney's Fees Motion; Research ruling in Boulden/Lamothe Case; emails to and from W Smith; Research Special Damages Cases	0.40 260.00/hr	104.00
8/8/2018	- LJW Review emails from Counsel for Boulden; emails to and from W Smith	0.03 260.00/hr	6.50
8/9/2018	- WJS Preparation for Hearing; attend Hearing on Fees and Costs Motion and Dismans Motion for Summary Judgment; file notes regarding Court Decision; conference with D Foley and C Wang at Courthouse regarding outcome of Hearing, Appeal Issues and strategy; conference with K Christensen regarding Court Order; Research Supersedeas Bonds; email to L Wolff regarding Summary of Court Decision and draft Order; telephone call from L Wolff regarding draft Order	0.80 260.00/hr	208.00
	- KBC Conference with W Smith; review Order, Entry and Recording Procedures	0.05 260.00/hr	13.00
	- LJW Telephone call to W Smith regarding Hearing and Case; preparation of Order	0.08 260.00/hr	19.50
8/10/2018	- LJW Preparation of proposed Order	0.18 260.00/hr	45.50
8/13/2018	- LJW Preparation of proposed Order; texts to and from W Smith	0.50 260.00/hr	130.00
8/14/2018	- LJW Preparation of proposed Order; review Motion; Research applicable NRS Statutes; email to W Smith	0.58 260.00/hr	149.50
8/15/2018	- LJW E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS E-mails from and to R Haskin; review and revise draft Order on Fees and Costs	0.35 260.00/hr	91.00
8/16/2018	- WJS Emails to and from R Haskin regarding draft Fee Order	0.03 260.00/hr	6.50
8/20/2018	- WJS Email from R Haskin; review and analyze redlines to draft Order; redline revisions to draft Order; emails to and from R Haskin; prepare draft Order; email to all Counsel	0.23 260.00/hr	58.50
8/21/2018	- DEM Conference with W Smith	0.08 260.00/hr	19.50
	- WJS E-mails to and from R Haskin and D Foley	0.03 260.00/hr	6.50

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018 - LJW	Review and download Order; review Rules regarding Appeal Statement; email to W Smith	0.08 260.00/hr	19.50
9/12/2018 - WJS	Review Order; conference with Clerk regarding filing	0.03 260.00/hr	6.50
9/13/2018 - WJS	Review Order; conference with Clerk; review draft Notice of Entry of Order; review Notices from Court regarding filing Order and Notice of Entry; review Notice from NV Supreme Court regarding Submission of Boulden/Lamothe Appeal for Decision without Oral Argument; conference with K Christensen	0.08 260.00/hr	19.50
9/14/2018 - LJW	Review Notice of Appeal and Order regarding Hearing; emails to and from W Smith	0.10 260.00/hr	26.00
9/18/2018 - WJS	Review Amended Docketing Statement of Appeal	0.05 260.00/hr	13.00
- LJW	Review Pleading Statement	0.10 260.00/hr	26.00
9/21/2018 - WJS	Review Notices from Supreme Court regarding Attorney's Fees Appeal; review Notice from District Court regarding Order Denying Disman Motion for Summary Judgment; telephone call from C Wang	0.15 260.00/hr	39.00
9/24/2018 - KBC	Conference with Attorney; review Research; telephone call to Client regarding Fees Order Recordation	0.08 260.00/hr	19.50
- LJW	Review and download Case Appeal and other Pleadings	0.08 260.00/hr	19.50
- WJS	Email from R Haskin; Research Judgment, Appeal, Stay and Supersedeas Bond Statutes and Caselaw; emails to and from and conference with K Christensen; review Judgment Lien and Recording Procedures; draft Affidavit for Recording Judgment; conference with Clerk regarding Certified Judgment; review Certified Judgment and prepare for Recording	0.65 260.00/hr	169.00
10/1/2018 - WJS	Research and draft Response to Motion to Stay and Post Supersedeas Bond; prepare for filing; review Notice from Court; review Appeal Statement	0.50 260.00/hr	130.00
- LJW	Review Pleadings and Orders filed	0.03 260.00/hr	6.50
- ELJ	Review Opposition to Motion to Stay Judgment and Deposit Bond	0.05 260.00/hr	13.00
10/2/2018 - WJS	Review Notices from Court; emails to and from L Wolff regarding Appeal Deadlines; email from C Wang; review draft Order Denying Disman's Motion for Summary Judgment; email to C Wang with Comments	0.30 260.00/hr	78.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2018	- WJS Telephone call from C Wang regarding draft Order on Disman Motion for Summary Judgment; Research Case impact; telephone call and email from Haskin's Office; review Stipulation to Continue Hearing on Stay and Bond; emails to and from Court; review Filings	0.15 260.00/hr	39.00
	- LJW Review all Appellate Proceedings; Research and calendar Due Dates for Briefing Schedules; emails to and from W Smith	0.25 260.00/hr	65.00
10/4/2018	- KBC Review Order regarding Settlement Program Exemption; calendar Appeal Brief Due Date; conference with W Smith	0.05 260.00/hr	13.00
10/8/2018	- KBC Conference with W Smith regarding Appeal Consolidation Issues	0.05 260.00/hr	13.00
	- LJW E-mails to and from W Smith; review filed Pleadings	0.08 260.00/hr	19.50
	- WJS Draft email to Clients regarding update on Case; emails to and from L Wolff regarding Appeal Issues and potential Consolidation or Stay of later Appeals; conference with K Christensen	0.25 260.00/hr	65.00
10/9/2018	- LJW E-mails to and from W Smith; review Pleadings	0.03 260.00/hr	6.50
	- WJS Revise and send email to Clients regarding Case update and Recommendation on Appeals	0.05 260.00/hr	13.00
	- KBC Review Appeal Options and email	0.05 260.00/hr	13.00
10/17/2018	- WJS Review Notices from Supreme Court; review Motions to Consolidate Cases from Haskin; emails to and from Haskin to clarify Motion to Consolidate Request and Briefing; review Docketing Statement for Case	0.20 260.00/hr	52.00
10/18/2018	- WJS Emails to and from R Haskin regarding Motion to Consolidate; emails to and from and telephone call from D Foley regarding Opposition to Motion to Consolidate	0.08 260.00/hr	19.50
	- LJW Review Docketing Statement and Motion to Consolidate; emails to and from W Smith	0.10 260.00/hr	26.00
10/19/2018	- WJS Review Notice from Court; review Opposition to Motion to Consolidate filed by D Foley	0.08 260.00/hr	19.50
10/23/2018	- WJS Preparation for Hearing; Appearance at Hearing; present Argument in Opposition to Motion to Stay Case pending Appeal; Research; review Nevada State Court Case regarding Fees and Costs Awards; telephone call from Counsel for Disman; conferences with L Wolff and K Christensen; Research regarding Advisory Opinions and Legal Advice from a Judge; review draft Opposition to Motion to Consolidate; review Notices from Court; review Joinder filed by Disman	0.85 260.00/hr	221.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2018	- KBC	Conference with W Smith regarding Hearing, Order and conference with opposing counsel	0.05 260.00/hr	13.00
	- LJW	Review Opposition to Motion to Consolidate Cases; preparation of Responses to Motion to Consolidate Cases; telephone call to W Smith regarding Hearing; Research Attorney's Fees	0.50 260.00/hr	130.00
10/24/2018	- WJS	Review Notices from Supreme Court; review Lytles' Reply Brief in Support of Consolidating Cases	0.05 260.00/hr	13.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
10/29/2018	- WJS	Emails to and from R Haskin regarding Extension of Briefing Dates and Joint Motion to Consolidate Cases; review draft Stipulations; review Notice from Supreme Court regarding Filings	0.10 260.00/hr	26.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
11/1/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Consolidate with Boulden Appeal	0.05 260.00/hr	13.00
11/5/2018	- LJW	Review Court Order	0.03 260.00/hr	6.50
11/7/2018	- WJS	Email from Counsel for Dismar; review letter to Court from Counsel for Dismar regarding proposed Summary Judgment Orders; telephone call from Counsel for Dismar	0.10 260.00/hr	26.00
11/15/2018	- LJW	Review Court Order regarding Jurisdiction	0.03 260.00/hr	6.50
11/16/2018	- DEM	Conference with W Smith; revise Stipulation to Extend Discovery; email from W Smith	0.08 260.00/hr	19.50
	- ELJ	Conference with W Smith and D Martin regarding Emergency Motion	0.15 260.00/hr	39.00
	- WJS	Review Notices from District Court regarding Motion to Reconsider and Order Shortening Time; review Motion; Research Caselaw, Reconsideration and Jurisdiction Issues; email to R Haskin regarding Hearing; conferences with E James and D Martin regarding preparation of Response and attending Hearing	0.53 260.00/hr	136.50
11/19/2018	- ELJ	Preparation of Opposition to Motion to Reconsider	0.95 260.00/hr	247.00
	- DEM	Research; email to W Smith; conference with E James	0.25 260.00/hr	65.00
	- KBC	Review Appeal Order and Order Shortening Time regarding Fees Hearing; conference with E James; email to L Wolff	0.05 260.00/hr	13.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2018	- LJW	Review Motion to Reconsider and Order Shortening Time; emails to and from Attorneys	0.10 260.00/hr	26.00
11/20/2018	- ELJ	Preparation of Opposition to Motion to Reconsider and review with L Wolff	0.53 260.00/hr	136.50
	- LJW	Preparation of Opposition to Motion to Reconsider; telephone call to E James	0.68 260.00/hr	175.50
11/21/2018	- LJW	Revisions to Opposition to Motion to Reconsider; emails to and from E James and Clerk	0.30 260.00/hr	78.00
11/26/2018	- LJW	Review filed document	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court and Opposition; preparation for Hearing	0.38 260.00/hr	97.50
11/27/2018	- ELJ	Conference with W Smith regarding Motion to Reconsider Attorney's Fees and Finality of Appeal	0.15 260.00/hr	39.00
	- WJS	Preparation for Hearing; Appearance at Hearing on Motion to Reconsider Fees Order and present Arguments in Opposition; conferences with E James and D Martin re outcome and pending Appeal Issues; review Order to Show Cause from Supreme Court; Research Cases cited by Supreme Court; conferences with E James and D Martin; review possible Dismissal of Appeal; emails to and from R Haskin regarding Extension of Time for Briefing in 71698 Appeal; review draft Stipulation	1.08 260.00/hr	279.50
	- LJW	Telephone call with W Smith regarding Hearing and Appeal Issues	0.05 260.00/hr	13.00
11/28/2018	- LJW	Review Stipulation and Order; emails to and from W Smith	0.03 260.00/hr	6.50
12/4/2018	- KBC	Review Supreme Court Appeal Decision; conference with W Smith regarding Procedures and Recommendations	0.10 260.00/hr	26.00
	- LJW	Review Order from Appellate Court; telephone call to W Smith regarding Order; preparation of Response to Order to Show Cause	0.38 260.00/hr	97.50
	- WJS	Review Notice from Nevada Supreme Court regarding Boulden/Lamothe Appeal; review Order Affirming District Court; telephone call from Counsel for Dismans regarding Issues remaining in District Court; telephone call from L Wolff regarding Order, coordination and analysis of Actions to resolve remaining Appeals and Issues; conference with K Christensen	0.48 260.00/hr	123.50
12/5/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeals; preparation of Motion to Dismiss; emails to and from W Smith	0.40 260.00/hr	104.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

Page 10

		<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018	- WJS Research Attorney's Fees on Appeal; review Supreme Court's 12/4/18 Order and Arguments; file notes; email to L Wolff regarding Issues; emails to and from Haskin, Foley and Wang regarding Supreme Court Order; coordinate Conference Call; emails from L Wolff	0.45 260.00/hr	117.00
12/6/2018	- LJW Review Court Order regarding Extension	0.03 260.00/hr	6.50
	- WJS Emails to and from opposing counsel regarding Conference Call	0.03 260.00/hr	6.50
12/7/2018	- WJS Teleconference with Counsel (Haskin, Foley, Wang) regarding Supreme Court Decision and potential Resolution; conference with K Christensen; telephone call to L Wolff; review Supreme Court filing; review CC&Rs; draft letter to R Haskin regarding Dismissal of Appeal and Warning of Sanctions	0.60 260.00/hr	156.00
	- KBC Conference with W Smith; review Appeal and Trial Procedures; review Negotiations Issues	0.10 260.00/hr	26.00
	- LJW Telephone call with W Smith regarding Motions	0.08 260.00/hr	19.50
12/10/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.50 260.00/hr	130.00
	- WJS Email from L Wolff; review and revise letter to Haskin; email from D Foley	0.15 260.00/hr	39.00
12/11/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.60 260.00/hr	156.00
12/12/2018	- KBC Review rescheduled Pre-Trial Conference, Calendar Call and Trial Dates for related Case; review emails regarding Fees Brief and Continuance Request	0.05 260.00/hr	13.00
	- LJW Preparation of Response to Order to Show Cause; Research Federal and State Rules regarding Consolidation; emails to and from W Smith; calendar dates for Trial	0.50 260.00/hr	130.00
	- WJS Email to L Wolff; review and redline draft Response to Order to Show Cause	0.60 260.00/hr	156.00
12/13/2018	- LJW Review Response and Stipulation	0.03 260.00/hr	6.50
	- WJS Revise and draft Response to Order to Show Cause; prepare for filing	0.40 260.00/hr	104.00
12/14/2018	- WJS Review Notices from Supreme Court; email from D Foley	0.05 260.00/hr	13.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2018	- KBC	Conference with Client regarding Appeal Issues and Lytle's Health Extension Request	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Lytle Response to Order to Show Cause	0.05 260.00/hr	13.00
12/18/2018	- LJW	Preparation of Response to Opposition to Order to Show Cause	0.25 260.00/hr	65.00
	- WJS	Emails to and from L Wolff regarding Order to Show Cause; email to D Foley and C Wange regarding Attorney's Fee Appeal; email from D Foley; review Stipulation for Dismissal of Remaining Claims in District Court Case	0.18 260.00/hr	45.50
12/19/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research on Hearing and on Frederic case	0.70 260.00/hr	182.00
	- WJS	Email from C Wang regarding Stipulation for District Court Case; email from R Haskin	0.05 260.00/hr	13.00
12/20/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research 54(b) Certification	0.50 260.00/hr	130.00
12/21/2018	- LJW	Preparation of Response to Lytle's Reply to Order to Show Cause; emails to and from W Smith	0.30 260.00/hr	78.00
	- WJS	Review and revise Response to Lytle's Reply to Order to Show Cause; review docket in District Court Case; email to L Wolff	0.25 260.00/hr	65.00
12/27/2018	- LJW	Review Order and calendar Due Date	0.03 260.00/hr	6.50
	- WJS	Email from R Haskin; review proposed changes to Dismissal Stipulation; review Notice from Supreme Court regarding Briefing Schedule; calendar Deadlines; conference with D Martin regarding Pre-Trial Conference	0.08 260.00/hr	19.50
1/3/2019	- WJS	E-mails from opposing counsel; review Redlines to draft Stipulation	0.08 260.00/hr	19.50
1/7/2019	- DEM	E-mails from and to W Smith; telephone calls to and from W Smith; review file	0.13 260.00/hr	32.50
	- WJS	Review Notice of Hearing; emails to and from and telephone calls to and from D Martin regarding Pre-Trial Conference; emails to and from opposing counsel regarding Stipulation; review draft	0.08 260.00/hr	19.50
1/8/2019	- WJS	Prepare for Pretrial Conference; Meeting with D Foley regarding Stipulation; Appearance for Pre-Trial Conference in Department 9 (D Barker); conference with D Foley regarding Fees and Costs; telephone call from C Wang regarding Appeal Issues, Fees and Costs; conference with K Christensen	0.60 260.00/hr	156.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019	- LJW Review Court Order	0.03 260.00/hr	6.50
1/15/2019	- LJW Review Stipulation and Order; telephone call to W Smith regarding Brief	0.08 260.00/hr	19.50
	- WJS Review Notices from Supreme Court and Opening Brief filed by Lytle's in Case No. 76198; telephone call to L Wolff regarding Issues on Appeal, substance of Lytle's Brief; and preparation of Response Brief	0.18 260.00/hr	45.50
1/16/2019	- LJW Preparation of Reply to Appellant's Brief	1.03 260.00/hr	266.50
	- WJS Review Notices from District Court; review Boulden & Lamothe Memo of Costs and Motion for Fees	0.15 260.00/hr	39.00
1/17/2019	- WJS Review and notate Lytle's Opening Brief	0.30 260.00/hr	78.00
1/18/2019	- LJW Review Court Pleadings	0.03 260.00/hr	6.50
1/19/2019	- LJW Preparation of Statement of Facts for Reply to Appellate Brief	0.55 260.00/hr	143.00
1/21/2019	- LJW Preparation of Points and Authorities regarding Law of Case Doctrine	1.00 260.00/hr	260.00
1/22/2019	- LJW Preparation of Points and Authorities regarding Equitable Orders	0.53 260.00/hr	136.50
1/23/2019	- LJW Preparation of Points and Authorities regarding Macintosh Caselaw	0.50 260.00/hr	130.00
	- WJS Review Notice from Court; review Dismar's Motion for Fees and Costs; review Docket for Hearing Dates	0.10 260.00/hr	26.00
1/24/2019	- LJW Preparation of Points and Authorities regarding Meaning of Statutes	0.48 260.00/hr	123.50
1/28/2019	- LJW Preparation of Points and Authorities regarding Meaning of Statutes; Research "Plain Meaning Cases"	0.28 260.00/hr	71.50
	- WJS Review Notice from Supreme Court regarding Order Consolidating Appeals; email to L Wolff regarding Response; calendar new Deadlines	0.08 260.00/hr	19.50
1/29/2019	- LJW Review Court Notice regarding Consolidation; calendar new Due Dates	0.05 260.00/hr	13.00
	- WJS Review Notice from District Court; review Lytle's Opposition to Boulden/Lamothe Motion for Fees and Costs	0.10 260.00/hr	26.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2019	- LJW	Review NRED 3 Litigation; review Opposition to Motion for Fees; preparation of Points and Authorities regarding "Plain Meaning" of Statutes	0.30 260.00/hr	78.00
2/1/2019	- LJW	Preparation of Points and Authorities on Plain Meaning of Statute	0.18 260.00/hr	45.50
2/4/2019	- LJW	Preparation of Points and Authorities on Statute; review Opposition to Motion to Retax Costs	0.18 260.00/hr	45.50
	- WJS	Review Notice from District Court; review Lamothe/Boulden Opposition to Motion to Retax Costs	0.05 260.00/hr	13.00
2/5/2019	- LJW	Preparation of Points and Authorities on Application of NRS 116.3117	0.33 260.00/hr	84.50
2/7/2019	- LJW	Research NRS 116.3117 and Judgment Liens	0.58 260.00/hr	149.50
2/8/2019	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.13 260.00/hr	32.50
2/11/2019	- WJS	E-mail from R Haskin regarding Order on Motion to Reconsider, Analysis and Order Issues	0.08 260.00/hr	19.50
	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.50 260.00/hr	130.00
2/12/2019	- ELJ	Conference with W Smith regarding Mootness of Order and Appeal Issues	0.08 260.00/hr	19.50
	- WJS	Conference with E James regarding Haskin's request; Research; emails to and from R Haskin regarding Motion to Reconsider and Extension Request; Notice from District Court and review Lytle Opposition to Dismantle Fee Motion; review Notice from Supreme Court and review Lytle Motion for Extension of Time to File Brief in Fees Case; emails to and from L Wolff regarding Extension Request	0.40 260.00/hr	104.00
	- LJW	Preparation of Summary of Facts on Answering Brief; Research Extension of Time to Answer Attorney's Argument Brief; email to W Smith; review Motion by Lytle regarding Extension of Time	0.55 260.00/hr	143.00
2/13/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief; review Court Order regarding Extension of Time	0.20 260.00/hr	52.00
	- WJS	Review Notice and Order from Supreme Court Granting Extension; calendar new Deadlines	0.05 260.00/hr	13.00
2/14/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief	0.45 260.00/hr	117.00
2/18/2019	- LJW	Review Reply to Opposition	0.08 260.00/hr	19.50

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

		<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.25 260.00/hr	65.00
	- WJS Review Notices from District Court; review Minute Order	0.03 260.00/hr	6.50
2/21/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.45 260.00/hr	117.00
2/27/2019	- WJS Review Notice from District Court regarding Hearing on Motion for Fees and Costs; review Docket	0.08 260.00/hr	20.80
3/13/2019	- WJS Review Notice from Supreme Court and Motion to Extend; conference with L Wolff; draft and file Response to Motion to Extend	0.35 260.00/hr	91.00
3/14/2019	- WJS Review Notices from Supreme Court; Research Dockets and Court calendar regarding District Court scheduled Hearings; emails to and from D Foley and C Wang regarding Hearing on Fees Motion	0.13 260.00/hr	32.50
	- LJW Review Motion to Extend Time; emails to and from W Smith; telephone call to W Smith regarding Motion	0.20 260.00/hr	52.00
3/15/2019	- LJW Review Reply to Opposition; emails to and from W Smith	0.08 260.00/hr	19.50
	- WJS Review from Supreme Court; review Reply filed by R Haskin; emails to and from L Wolff	0.08 260.00/hr	19.50
3/19/2019	- LJW Review Notice from Court	0.03 260.00/hr	6.50
4/10/2019	- WJS Preparation for and Appearance at Hearing of Fees and Costs Motions filed by other Plaintiffs; review Notice from Court regarding new Hearing Date before Judge Williams; emails to and from opposing counsel	0.35 260.00/hr	91.00
4/22/2019	- LJW Review filings regarding Extensions of Time; emails to and from W Smith; calendar Due Dates	0.08 260.00/hr	19.50
	- WJS Review Notice from District Court regarding Order on Stipulation to Continue Hearing; review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule; emails to and from L Wolff; draft and file Opposition to Motion to Continue	0.20 260.00/hr	52.00
4/23/2019	- LJW Review Motion and Opposition	0.03 260.00/hr	6.50
4/26/2019	- LJW Review Reply to Opposition	0.03 260.00/hr	6.50
	- KBC Conference with W Smith regarding Extension Motion and Opposition; calendar Hearing	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2019	- WJS	Review Notice from Supreme Court regarding Lytle Reply Brief; email from D Foley regarding Issues for Hearing; conference with K Christensen regarding status of Case and Briefing Schedule	0.15 260.00/hr	39.00
5/2/2019	- LJW	Review Court Order regarding Extension; emails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Order Denying Lytle Motion for Extension of Briefing Deadlines; emails to and from L Wolff; email to D Foley and C Wang	0.05 260.00/hr	13.00
5/7/2019	- WJS	Review Notice from District Court; review Motion to Set Hearing filed by Lytles	0.08 260.00/hr	19.50
5/15/2019	- WJS	Review emails from R Haskin; emails to and from and telephone call from D Foley regarding Hearing; review Court Pleadings and papers and preparation for Hearing	0.15 260.00/hr	39.00
5/16/2019	- WJS	Prepare for and attend Hearing at RJC (Judge Williams) on Motions for Fees and Costs (other Plaintiffs); case notes; Notices from Supreme Court regarding Lytle Opening Brief on Fees Appeal; emails to and from L Wolff	0.88 260.00/hr	227.50
	- LJW	Review Opening Brief and Appendices	0.15 260.00/hr	39.00
5/17/2019	- WJS	Review Notice from District Court and Minute Order Granting Fee Motions	0.05 260.00/hr	13.00
5/20/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
	- WJS	Review and annotate Lytle Opening Brief on Fees	0.38 260.00/hr	97.50
5/21/2019	- LJW	Telephone call to W Smith regarding Answering Brief; email to Court Clerk regarding Transcript; preparation of Answering Brief	0.38 260.00/hr	97.50
5/22/2019	- LJW	E-mails to and from Court Clerk	0.03 260.00/hr	6.50
5/28/2019	- KBC	Review Judgment Renewal Notice; emails to and from Attorney	0.05 260.00/hr	13.00
6/3/2019	- LJW	Preparation of Reply Brief; Research Standard of Review for Attorney's Fees and Costs on Appeal	0.70 260.00/hr	182.00
6/4/2019	- LJW	Research Law of the Case	0.40 260.00/hr	104.00
6/5/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	1.00 260.00/hr	260.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019 - LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	0.88 260.00/hr	227.50
6/7/2019 - LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees	1.75 260.00/hr	455.00
6/10/2019 - LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees; telephone call to W Smith regarding Facts Section	1.25 260.00/hr	325.00
- WJS	Telephone call from L Wolff regarding Arguments for Appeal Brief	0.15 260.00/hr	39.00
6/11/2019 - LJW	Preparation of Reply Brief; review and revise Citations to Law and Record; review Transcript and add to Brief; preparation of Exhibits for Appendix; revise Citations to Appendix	1.75 260.00/hr	455.00
6/12/2019 - LJW	Preparation of Reply Brief; preparation of Fact Section; preparation of Appendix	1.05 260.00/hr	273.00
- WJS	Review and Redline draft Reply Brief; draft Answering Brief on Consolidated Appeals, Research	1.93 260.00/hr	500.50
6/13/2019 - LJW	Preparation of Appendix; Citations to Record; emails to and from W Smith	0.70 260.00/hr	182.00
- WJS	Research and draft Answering Brief; review Documents for Respondents' Appendix, preparation of Appendix	1.63 260.00/hr	422.50
6/14/2019 - WJS	Preparation of Respondents' Appendix; review and revise Answering Brief	0.45 260.00/hr	117.00
- LJW	Preparation of Appendix; revisions to Citations to Record; emails to and from W Smith; review Appellate Rules regarding Appendices and Documents	0.70 260.00/hr	182.00
6/17/2019 - WJS	Preparation of Table of Contents; review and revise Answering Brief; prepare Certifications; sign and prepare Brief and Appendix for filing	1.65 260.00/hr	429.00
6/18/2019 - WJS	Review Notice from Court; emails to and from L Wolff; review Notice form Court	0.05 260.00/hr	13.00
6/19/2019 - WJS	Review Order, make adjustments to Brief and prepare for filing; conference with Clerk regarding filing; review Court Notices regarding Acceptance of Filing	0.15 260.00/hr	39.00
- LJW	Review Appellate Motion	0.05 260.00/hr	13.00
7/15/2019 - WJS	Emails to and from R Haskin; review Agreement and Appellant filings	0.10 260.00/hr	26.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2019 - WJS	Email from R Haskin; review draft Extension Stipulation; review Notices from Supreme Court	0.03 260.00/hr	6.50
8/5/2019 - WJS	Emails to and from R Haskin; review and approve Stipulation	0.03 260.00/hr	6.50
8/19/2019 - WJS	Review Notice from Supreme Court; review Motion and Lytle Reply Brief; email to L Wolff	0.15 260.00/hr	39.00
8/20/2019 - LJW	Review Motions and Research Brief and Opposition	0.28 260.00/hr	71.50
8/21/2019 - WJS	Emails to and from L Wolff regarding Response to Lytle Reply Brief	0.05 260.00/hr	13.00
- LJW	Review Motions and Research Brief and Opposition; emails to and from W Smith	0.58 260.00/hr	149.50
8/22/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.65 260.00/hr	169.00
8/23/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.55 260.00/hr	143.00
8/26/2019 - LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit; emails to and from W Smith	0.60 260.00/hr	156.00
- WJS	Review and revise Opposition and Countermotion; review Notice from Court	0.10 260.00/hr	26.00
8/27/2019 - LJW	Review and download Court Order	0.03 260.00/hr	6.50
9/3/2019 - LJW	Review and download Pleading	0.03 260.00/hr	6.50
9/4/2019 - WJS	Review Supreme Court filings from Lytles; emails to and from Counsel for Dismar regarding Stay of Execution and Fees Order	0.08 260.00/hr	19.50
9/30/2019 - WJS	Review Notice from Court regarding Appeal of Attorneys Fee Order; review Supreme Court Docket regarding Appeal	0.08 260.00/hr	19.50
10/1/2019 - LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
10/4/2019 - LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
- WJS	Review Notice from Court regarding Appeal of Boulden/Lamothe Fee Order	0.03 260.00/hr	6.50
10/22/2019 - WJS	Review Notice from District Court regarding Stipulation to Stay Execution, Posting on Bond; review Notice from Supreme court regarding Association of Counsel for Lytle	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2019	- WJS	Review Notices from Court regarding Appearance for Lytle and request for Transcripts	0.03 260.00/hr	6.50
12/4/2019	- KBC	Conference with W Smith regarding Hearing and Order Appointing HOA Receiver	0.06 260.00/hr	16.25
	- WJS	Telephone call from K Christensen regarding Appointment of Receiver over Association, review Case History and Minutes of Proceedings; email to K Christensen and email to Clerk	0.20 260.00/hr	52.00
1/13/2020	- LJW	Review Court order regarding Lamothe	0.03 260.00/hr	6.50
1/21/2020	- WJS	Review Order from Supreme Court; Research; draft Response	0.35 260.00/hr	91.00
1/24/2020	- WJS	Conference with K Christensen and K Kearl regarding Receiver; review Case file; email to K Christensen with documents; conference with K Christensen	0.30 260.00/hr	78.00
	- KBC	Review Orders; Research; telephone call from Client regarding HOA Judgment and Receiver correspondence; conference with Client and W Smith; review CCRs, Receiver Documents and preparation for conference with Client	0.48 260.00/hr	123.50
1/27/2020	- WJS	Research; conference with K Christensen; preparation for conference with Clients; telephone call from C Wang; conference with Clients; draft letter to Receiver; email to L Wolff	0.75 260.00/hr	195.00
	- KBC	Review Receiver letter and Orders; review Injunction; Research; conference with W Smith regarding Contempt, Fees, Motion to Vacate and Sanctions; conference with Clients regarding Demand and Motions	0.63 260.00/hr	162.50
1/28/2020	- DEM	Conference with W Smith; review letter to Receiver	0.18 260.00/hr	45.50
	- WJS	Emails to and from L Wolff; draft letter to Receiver; Research; conference with D Martin regarding revisions; preparation of Exhibits; email to K Christensen; conference with K Christensen	0.60 260.00/hr	156.00
	- KBC	Review letter to Receiver and Attorney; email to Attorney; conference with W Smith	0.06 260.00/hr	16.25
	- LJW	Review letter to Client and Court filings; email to W Smith	0.13 260.00/hr	32.50
1/29/2020	- LJW	E-mails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Emails to and from D Foley regarding letter from Receiver; revise letter to Receiver; email from J Gegen; email to Clients	0.13 260.00/hr	32.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2020	- LJW E-mails to and from W Smith; preparation of Motion for Order to Show Cause	0.50 260.00/hr	130.00
	- WJS Review follow-up letter from Receiver; conference with K Christensen; email to L Wolff regarding drafting Motion	0.05 260.00/hr	13.00
	- KBC Review letter from Receiver canceling Meeting; conference with W Smith; conference with Client	0.06 260.00/hr	16.25
2/4/2020	- KBC Conference with W Smith regarding Motion for OTSC and Contempt; emails to and from Attorney regarding Motion; review Hearing Notice	0.06 260.00/hr	16.25
	- WJS Review notification from Court; review Motion to Reduce to Judgment from old Case; conference with K Christensen; Research Dockets; conference with L Wolff regarding Motion	0.28 260.00/hr	71.50
	- LJW Telephone call with W Smith; preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.90 260.00/hr	234.00
2/5/2020	- WJS E-mail from J Gegen; review letters	0.03 260.00/hr	6.50
	- LJW Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.38 260.00/hr	97.50
2/6/2020	- LJW Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.28 260.00/hr	71.50
2/10/2020	- WJS E-mails to and from D Foley; review Renewed Motion to Appoint Receiver; messages to and from L Wolff; Research	0.40 260.00/hr	104.00
	- LJW Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.53 260.00/hr	136.50
2/11/2020	- KBC Calendar Hearing; conference with W Smith; review Motion	0.03 260.00/hr	6.50
	- WJS Messages to and from L Wolff regarding Receiver Report	0.03 260.00/hr	6.50
	- LJW Preparation of Motion for Order to Show Cause; Research Order to Show Cause	1.00 260.00/hr	260.00
2/12/2020	- LJW Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearn, Zobrist and Gegan; preparation of Affidavit for W Smith	1.93 260.00/hr	500.50
2/13/2020	- LJW Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearn, Zobrist and Gegan; preparation of Affidavit for W Smith	1.08 260.00/hr	279.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2020	- WJS E-mail from L Wolff; review and revise Motion for Order to Show Cause	0.25 260.00/hr	65.00
	- LJW Preparation of Motion to Intervene	1.03 260.00/hr	266.50
2/18/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.63 260.00/hr	162.50
2/19/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.80 260.00/hr	208.00
2/20/2020	- LJW Preparation of Motion to Strike Order	0.80 260.00/hr	208.00
2/21/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	0.80 260.00/hr	208.00
	- LJW Preparation of Motion to Intervene	0.55 260.00/hr	143.00
2/22/2020	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/24/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	1.05 260.00/hr	273.00
	- LJW Preparation of Motion to Intervene	0.73 260.00/hr	188.50
2/25/2020	- WJS Drafting and revisions to Motion for Order to Show Cause; Research; email to L Wolff	1.30 260.00/hr	338.00
	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/26/2020	- WJS E-mails to and from L Wolff	0.03 260.00/hr	6.50
	- LJW Preparation of Motion to Intervene	0.53 260.00/hr	136.50
3/2/2020	- WJS Review and revise Motion to Intervene; Research; review Notice from Nevada Supreme Court; review Order Submitting for Decision; draft Affidavits; review Notice from NSC; review Order of Affirmance; conference with K Christensen; revisions to Motion for Order to Show Cause and Motion to Intervene	1.50 260.00/hr	390.00
3/3/2020	- WJS E-mails to and from L Wolff; review and revise Motions and Affidavits; emails to Client regarding Affidavits; preparation of Exhibits; meet with Zobrist and Kearl; telephone call from L Wolff	0.70 260.00/hr	182.00
	- LJW Review Affirmance Order from Supreme Court; telephone call to W Smith	0.10 260.00/hr	26.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2020	- WJS	0.65 260.00/hr	169.00
			Emails to and from D Foley and C Wang; Research Court Rules; draft Bill of Costs on Appeal; Research Supersedeas Bond; notes to file; meet with Julie Gegen regarding Affidavits; revisions to Motions; prepare Motions and Exhibits for filing
3/5/2020	- WJS	0.18 260.00/hr	45.50
			Review Notices from Court regarding Hearings, calendar and send emails to Counsel; draft Bill of Costs; finalize and prepare for filing; review Notices from Supreme Court
3/6/2020	- KBC	0.09 260.00/hr	22.75
			Conference with W Smith regarding proposed Motion and Hearing Stipulation and Issues; review email from new opposing counsel
	- WJS	0.20 260.00/hr	52.00
			Review Notice; review Joinders filed by C Wang and D Foley; email to Clients; email from D Waite regarding Stipulation to Intervene; conference with K Christensen
3/9/2020	- WJS	0.60 260.00/hr	156.00
			Research Intervention Rules; telephone call from D Waite regarding Stipulation to Intervene; telephone call from C Wang; telephone call from R Dismar; email from D Waite and review and redline draft Stipulation; review Court Notices
	- LJW	0.03 260.00/hr	6.50
			Review Pleadings; email to W Smith
3/10/2020	- KBC	0.10 260.00/hr	26.00
			Conference with W Smith regarding requested Stipulation to Intervene, OTSC, Attorney's Fees and Receiver Issues; review Attorney emails
	- WJS	0.35 260.00/hr	91.00
			E-mails from D Waite regarding Settlement Offer and Stipulation on Motion to Intervene; conference with K Christensen; draft revisions to Stipulation; emails to and from L Wolff; emails to and from D Waite; telephone call from D Foley; conference with Clerk regarding Fees Statements
	- LJW	0.05 260.00/hr	13.00
			Review revised Stipulation and Order; emails to and from W Smith
3/11/2020	- WJS	0.40 260.00/hr	104.00
			E-mails from D Waite; review and analysis of Stipulation redline; preparation for Status Hearing in Receiver Action; check Docket; email to Counsel for Receiver
	- LJW	0.78 260.00/hr	201.50
			Preparation of Motion to Set Aside Order
3/12/2020	- KBC	0.08 260.00/hr	19.50
			Conference with W Smith; preparation of Motion to Vacate Order; review D Waitz letter to Receiver
	- ELJ	0.65 260.00/hr	169.00
			Meeting with W Smith regarding opposing Arguments (.7); Research Caselaw on Unclean Hands and Fraud on Court; email to W Smith and L Wolff with Caselaw and Arguments
	- WJS	1.20 260.00/hr	312.00
			Preparation for Hearing; Appearance at Status Hearing in Receivership Case; telephone call to L Wolff regarding Motion; email from Receiver's Counsel, review January Status Report; letter from D Waite - analysis; conference with Clerk regarding

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020	- LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
	- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020	- WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
	- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
	- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020	- WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020	- WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020	- LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020	- WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020	- WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
	- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

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Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2020	- WJS Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

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\$ 7,592.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2020	- WJS Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff	0.28 260.00/hr	71.50
	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date	1.48 260.00/hr	383.50
4/11/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.38 260.00/hr	97.50
4/13/2020	- WJS Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley	2.38 260.00/hr	617.50
	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall	1.75 260.00/hr	455.00
4/14/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk	1.85 260.00/hr	481.00
	- WJS Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff	1.25 260.00/hr	325.00
4/15/2020	- WJS E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff	1.20 260.00/hr	312.00
	- LJW Review filings and emails; email to W Smith	0.05 260.00/hr	13.00
4/16/2020	- DEM Research recent Nevada HOA Caselaw; email to W Smith	0.25 260.00/hr	65.00
4/17/2020	- WJS E-mail from D Martin and review new Supreme Court Opinion	0.10 260.00/hr	26.00
4/20/2020	- LJW Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond	0.30 260.00/hr	78.00

\$2,801.50
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\$11,206.00

Gerry R. Zobrist and Jolin G. Zobrist Family Trust

		<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2020 - WJS	Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020 - WJS	Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020 - KBC	Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
- WJS	Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
- LJW	Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020 - LJW	Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
- WJS	Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020 - WJS	Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
- LJW	Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020 - WJS	E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020 - LJW	Review emails and revised Order	0.05 260.00/hr	13.00

\$ 1,456.00

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\$ 5,824.00

Gerry R. Zobrist and Jolin G. Zobrist Family Trust

		<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2020 - LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
	For professional services rendered	144.28	\$37,350.80
	Additional Charges :		
		<u>Qty/Price</u>	
5/24/2018 - N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018 - LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018 - N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018 - N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018 - N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018 - N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018 - N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018 - N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018 - N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018 - N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018 - N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018 - N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018 - N	Clark County District Court Download Fee	0.25 2.00	0.50

Gerry R. Zobrist and Jolin G. Zobrist Family Trust

			<u>Qty/Price</u>	<u>Amount</u>
8/31/2018 - N	WestLaw Research 8/1-8/31/18		0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs		0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)		0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs		0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18		0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay		0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18		0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider		0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18		0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider		0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)		0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)		0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019		0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal		0.25 443.54	110.89
6/30/2019 - N	WestLaw Research		0.25 301.54	75.39
8/31/2019 - N	WestLaw Research		0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020		0.25 31.81	7.95

Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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			<u>Qty/Price</u>	<u>Amount</u>
2/4/2020 - N	Clark County District Court Document Download - Order on Receivership	0.25 5.50	1.38	
2/5/2020 - N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver	0.25 101.97	25.49	
2/11/2020 - N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses	0.25 19.00	4.75	
2/29/2020 - N	WestLaw Research - February 2020	0.25 528.58	132.15	
3/4/2020 - N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders	0.25 3.50	0.88	
- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure	0.25 356.79	89.20	
3/11/2020 - N	Court Parking Expense at Hearing	0.25 6.00	1.50	
3/26/2020 - N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order	0.25 3.50	0.88	
3/31/2020 - N	WestLaw Research (March 2020)	0.25 683.39	170.85	
4/10/2020 - N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)	0.25 3.50	0.88	
4/13/2020 - N	District Court Filing Fee - Notice to Appear (A-18-775843-C)	0.25 3.50	0.88	
4/14/2020 - N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)	0.25 3.50	0.88	
- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)	0.25 3.50	0.88	
- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)	0.25 3.50	0.88	
4/15/2020 - N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)	0.25 51.00	12.75	
4/30/2020 - N	WestLaw Research April 2020	0.25 250.87	62.72	

Gerry R. Zobrist and Jolin G. Zobrist Family Trust

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		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	<u>144.28</u>	\$38,387.07

Exhibit H

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Exhibit H

History of Billing

Raynaldo G. Evelyn A. Sandoval Jt Living & Devolution Trust
1860 Rosemere Court
Las Vegas, NV 89117

Professional Services

		Hrs/Rate	Amount
5/23/2018 - LJW	Preparation of Memorandum of Costs	0.43 260.00/hr	110.50
5/24/2018 - LJW	Conference with W Smith regarding Fees and Costs; review Bills to redact Privileged Information; conference with Clerk	0.48 260.00/hr	123.50
- WJS	Email from L Wolff regarding Motion for Fees; review signed Order; conference with Clerk regarding filing Order; preparation of Notice of Entry of Order; review draft Notice of Entry; conference with L Wolff regarding Motion for Fees, review Billing Statements	0.25 260.00/hr	65.00
5/28/2018 - LJW	E-mails to and from Clerk regarding Notice	0.03 260.00/hr	6.50
5/29/2018 - LJW	Preparation of Motion for Fees; preparation of Declaration for Fees; preparation of Exhibits	0.63 260.00/hr	162.50
5/30/2018 - LJW	Preparation of Declaration for Fees; preparation of Exhibits for Motion; review Billings for Privilege; telephone call to Clerk regarding Redaction of Privileged Information; preparation of Spreadsheet calculating Fees and Costs	0.58 260.00/hr	149.50
5/31/2018 - DEM	Preparation of documents for Disclosure in Motion for Fees; conference with W Smith	0.13 260.00/hr	32.50
- LJW	Preparation of Declaration for Fees; preparation of Exhibits for Motion; preparation of Spreadsheet calculating Fees and Costs	0.38 260.00/hr	97.50
- WJS	Review redacted Fee Statements; prepare for filing; review and redline draft Motion for Fees, associated Research and Citation Check; review and redline Declaration in Support of Fees Motion	1.38 260.00/hr	357.50

Raynaldo G. Evelyn A. Sandoval Jt Living & Devolution Trust

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2018	- WJS	Revise Motion, Declaration and Memo of Costs; conference with Clerk regarding Fee Statements; email to L Wolff; review Rules regarding Timing	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith regarding Motion for Attorney's Fees and Costs; telephone call with Clerk regarding redaction of Bills; review revisions to Motion	0.13 260.00/hr	32.50
6/4/2018	- WJS	Emails to and from L Wolff; revise Fees Motion and related Documents	0.20 260.00/hr	52.00
	- LJW	Review and revise Memorandum of Costs, Declaration of W. Smith, Motion for Attorney's Fees and Costs, Exhibits and update Summary of Fees and Costs; telephone call to Clerk regarding redaction and filing updated Billing Summary	0.55 260.00/hr	143.00
6/5/2018	- WJS	Review Notices from Court; review filings; calendar Hearing Date; email to L Wolff regarding Notice of Hearing	0.08 260.00/hr	19.50
6/6/2018	- LJW	Preparation of Notice of Hearing; emails to and from W Smith regarding Notice; emails to and from Clerk regarding Notice; review filed Pleadings	0.15 260.00/hr	39.00
6/11/2018	- LJW	Review Motion to Retax Costs; email to W Smith regarding Motion; email to Clerk regarding Receipts; Research Evidence of Costs	0.43 260.00/hr	110.50
6/12/2018	- LJW	Research Memorandum and Evidence of Costs; telephone call to Clerk regarding Receipts and Spreadsheet; preparation of Opposition to Motion to Retax Costs	0.48 260.00/hr	123.50
6/13/2018	- WJS	Email from R Haskin; emails to and from L Wolff; review NRAP; emails to and from R Haskin regarding Request for Stipulation on Appeal Reply	0.20 260.00/hr	52.00
	- LJW	Preparation of Opposition to Motion to Retax Costs; emails to and from W Smith regarding request to file Reply; Research Issues related to Replies to Amicus Brief; telephone call with Clerk regarding Costs	0.58 260.00/hr	149.50
6/14/2018	- LJW	Research Costs Awarded by District Courts and preparation of Opposition to Motion to Retax Costs	0.33 260.00/hr	84.50
6/15/2018	- WJS	Emails to and from L Wolff; review and revise Opposition to Motion to Retax Costs and Support Declarations; telephone call from L Wolff; conference with K Christensen	0.38 260.00/hr	97.50
	- LJW	Preparation of Opposition to Motion to Retax Costs; revisions to Motion; preparation of Declaration for Opposition; preparation of Exhibits for Opposition; emails to and from W Smith; emails to and from Clerk	0.95 260.00/hr	247.00
6/19/2018	- WJS	Review Notices from Court; review Notice of Appeal and Appeal Statement filed by Lyles; review Property Records regarding Recorded Releases; review NRAP regarding timing and Appeal; review Notice from Supreme Court; review Motion for Leave to File	0.35 260.00/hr	91.00

Raynaldo G. Evelyn A. Sandoval Jt Living & Devolution Trust

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
		Response to Amicus Brief; email to D Foley and C Wang regarding Motion and Appeal Issues		
6/19/2018	- KBC	Conference with W Smith regarding Appeal Notice and Fees Motion; <u>calendar Brief Due Dates</u>	0.05 260.00/hr	13.00
6/20/2018	- WJS	E-mails to and from D Foley; draft Opposition to Motion for Leave to Respond to Amicus Brief; email to D Foley	0.55 260.00/hr	143.00
	- LJW	Review Motion to File Amicus Brief; emails to and from W Smith regarding Amicus	0.10 260.00/hr	26.00
6/22/2018	- LJW	Review Releases	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court; review Opposition to Motion for Fees; email to L Wolff regarding Reply; review Notice from Supreme Court; review Response to Motion to Respond to Amicus Brief (filed by Foley)	0.10 260.00/hr	26.00
6/25/2018	- LJW	Review Pleadings; emails to and from W Smith regarding Motion	0.05 260.00/hr	13.00
6/26/2018	- KBC	Conference with W Smith regarding Fees Motion, Appeal Brief, Consolidation and Client conference for Instructions	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court regarding Docketing of Notice of Appeal; review Record Transmitted by District Court; conference with K Christensen; email to Clients	0.23 260.00/hr	58.50
6/27/2018	- LJW	Review Opposition; preparation of Reply to Opposition	0.18 260.00/hr	45.50
6/28/2018	- LJW	Research Arbitration Requirement and CC&Rs; preparation of Reply to Opposition	0.73 260.00/hr	188.50
	- WJS	Review Notice from District Court; review Dismar's Motion for Summary Judgment; emails to and from L Wolff	0.08 260.00/hr	19.50
6/29/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees	0.38 260.00/hr	97.50
7/2/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; Research NRS 38.310	1.18 260.00/hr	305.50
	- KBC	Review Dismar's Motion for Summary Judgment; conference with Clerk; calendar Hearing	0.10 260.00/hr	26.00
7/3/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply	0.85 260.00/hr	221.00
7/5/2018	- WJS	Email from and telephone calls to and from L Wolff regarding Arguments for Reply Brief; review and revise Reply on Motion for Fees and Costs; Research; emails to and from L Wolff	0.45 260.00/hr	117.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply; telephone call to W Smith; email to Clerk regarding filing; Research Liens and Possessor Interests; Research Lytles Defenses regarding recording Liens	0.83 260.00/hr	214.50
7/6/2018	- LJW	Review Order; calendar Hearing Date	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Rescheduled Hearing; emails to and from R Haskin and C Wang regarding Hearing Date	0.05 260.00/hr	13.00
7/20/2018	- LJW	E-mails to and from W Smith regarding Transcript; Research on Appellate Rules and Transcripts; email to opposing counsel	0.38 260.00/hr	97.50
7/23/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Respond to Amicus Brief	0.08 260.00/hr	19.50
7/24/2018	- WJS	E-mail from Counsel for Lytle; review Hearing Transcripts	0.10 260.00/hr	26.00
7/25/2018	- WJS	Review Motions, Oppositions, Replies and Exhibits related to Fees and Costs; prepare for Hearing on Motion	0.45 260.00/hr	117.00
7/26/2018	- WJS	Prepare for, attend and present Oral Argument at Hearing on Motion for Attorney's Fees and Costs; conference with C Wang regarding Disman Motion for Summary Judgment; review Docket and Opposition; conference with E James regarding Hearing; telephone call from C Wang	1.03 260.00/hr	266.50
7/27/2018	- KBC	Review Hearing Notice; calendar Hearing on Motion for Summary Judgment; conference with W Smith	0.03 260.00/hr	6.50
7/30/2018	- LJW	Review Case Statement; emails to and from opposing counsel; emails to W Smith; review Orders and Motions	0.15 260.00/hr	39.00
8/2/2018	- LJW	Review and download Pleadings filed by Dismans and Lytles	0.13 260.00/hr	32.50
8/6/2018	- LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	Review Court Notices and Reply Brief from Dismans; emails to and from L Wolf regarding Hearing	0.23 260.00/hr	58.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2018	- WJS	E-mails to and from L Wolff and D Foley regarding Boulden & Lamothe Fee Motion; review Transcripts; preparation for Hearing	0.33 260.00/hr	84.50
	- LJW	Review Court Record regarding Attorney's Fees Motion; Research ruling in Boulden/Lamothe Case; emails to and from W Smith; Research Special Damages Cases	0.40 260.00/hr	104.00
8/8/2018	- LJW	Review emails from Counsel for Boulden; emails to and from W Smith	0.03 260.00/hr	6.50
8/9/2018	- WJS	Preparation for Hearing; attend Hearing on Fees and Costs Motion and Dismans Motion for Summary Judgment; file notes regarding Court Decision; conference with D Foley and C Wang at Courthouse regarding outcome of Hearing, Appeal Issues and strategy; conference with K Christensen regarding Court Order; Research Supersedeas Bonds; email to L Wolff regarding Summary of Court Decision and draft Order; telephone call from L Wolff regarding draft Order	0.80 260.00/hr	208.00
	- KBC	Conference with W Smith; review Order, Entry and Recording Procedures	0.05 260.00/hr	13.00
	- LJW	Telephone call to W Smith regarding Hearing and Case; preparation of Order	0.08 260.00/hr	19.50
8/10/2018	- LJW	Preparation of proposed Order	0.18 260.00/hr	45.50
8/13/2018	- LJW	Preparation of proposed Order; texts to and from W Smith	0.50 260.00/hr	130.00
8/14/2018	- LJW	Preparation of proposed Order; review Motion; Research applicable NRS Statutes; email to W Smith	0.58 260.00/hr	149.50
8/15/2018	- LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	E-mails from and to R Haskin; review and revise draft Order on Fees and Costs	0.35 260.00/hr	91.00
8/16/2018	- WJS	Emails to and from R Haskin regarding draft Fee Order	0.03 260.00/hr	6.50
8/20/2018	- WJS	Email from R Haskin; review and analyze redlines to draft Order; redline revisions to draft Order; emails to and from R Haskin; prepare draft Order; email to all Counsel	0.23 260.00/hr	58.50
8/21/2018	- DEM	Conference with W Smith	0.08 260.00/hr	19.50
	- WJS	E-mails to and from R Haskin and D Foley	0.03 260.00/hr	6.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018	- LJW	Review and download Order; review Rules regarding Appeal Statement; email to W Smith	0.08 260.00/hr	19.50
9/12/2018	- WJS	Review Order; conference with Clerk regarding filing	0.03 260.00/hr	6.50
9/13/2018	- WJS	Review Order; conference with Clerk; review draft Notice of Entry of Order; review Notices from Court regarding filing Order and Notice of Entry; review Notice from NV Supreme Court regarding Submission of Boulden/Lamothe Appeal for Decision without Oral Argument; conference with K Christensen	0.08 260.00/hr	19.50
9/14/2018	- LJW	Review Notice of Appeal and Order regarding Hearing; emails to and from W Smith	0.10 260.00/hr	26.00
9/18/2018	- WJS	Review Amended Docketing Statement of Appeal	0.05 260.00/hr	13.00
	- LJW	Review Pleading Statement	0.10 260.00/hr	26.00
9/21/2018	- WJS	Review Notices from Supreme Court regarding Attorney's Fees Appeal; review Notice from District Court regarding Order Denying Disman Motion for Summary Judgment; telephone call from C Wang	0.15 260.00/hr	39.00
9/24/2018	- KBC	Conference with Attorney; review Research; telephone call to Client regarding Fees Order Recordation	0.08 260.00/hr	19.50
	- LJW	Review and download Case Appeal and other Pleadings	0.08 260.00/hr	19.50
	- WJS	Email from R Haskin; Research Judgment, Appeal, Stay and Supersedeas Bond Statutes and Caselaw; emails to and from and conference with K Christensen; review Judgment Lien and Recording Procedures; draft Affidavit for Recording Judgment; conference with Clerk regarding Certified Judgment; review Certified Judgment and prepare for Recording	0.65 260.00/hr	169.00
10/1/2018	- WJS	Research and draft Response to Motion to Stay and Post Supersedeas Bond; prepare for filing; review Notice from Court; review Appeal Statement	0.50 260.00/hr	130.00
	- LJW	Review Pleadings and Orders filed	0.03 260.00/hr	6.50
	- ELJ	Review Opposition to Motion to Stay Judgment and Deposit Bond	0.05 260.00/hr	13.00
10/2/2018	- WJS	Review Notices from Court; emails to and from L Wolff regarding Appeal Deadlines; email from C Wang; review draft Order Denying Disman's Motion for Summary Judgment; email to C Wang with Comments	0.30 260.00/hr	78.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2018	- WJS Telephone call from C Wang regarding draft Order on Disman Motion for Summary Judgment; Research Case impact; telephone call and email from Haskin's Office; review Stipulation to Continue Hearing on Stay and Bond; emails to and from Court; review Filings	0.15 260.00/hr	39.00
	- LJW Review all Appellate Proceedings; Research and calendar Due Dates for Briefing Schedules; emails to and from W Smith	0.25 260.00/hr	65.00
10/4/2018	- KBC Review Order regarding Settlement Program Exemption; calendar Appeal Brief Due Date; conference with W Smith	0.05 260.00/hr	13.00
10/8/2018	- KBC Conference with W Smith regarding Appeal Consolidation Issues	0.05 260.00/hr	13.00
	- LJW E-mails to and from W Smith; review filed Pleadings	0.08 260.00/hr	19.50
	- WJS Draft email to Clients regarding update on Case; emails to and from L Wolff regarding Appeal Issues and potential Consolidation or Stay of later Appeals; conference with K Christensen	0.25 260.00/hr	65.00
10/9/2018	- LJW E-mails to and from W Smith; review Pleadings	0.03 260.00/hr	6.50
	- WJS Revise and send email to Clients regarding Case update and Recommendation on Appeals	0.05 260.00/hr	13.00
	- KBC Review Appeal Options and email	0.05 260.00/hr	13.00
10/17/2018	- WJS Review Notices from Supreme Court; review Motions to Consolidate Cases from Haskin; emails to and from Haskin to clarify Motion to Consolidate Request and Briefing; review Docketing Statement for Case	0.20 260.00/hr	52.00
10/18/2018	- WJS Emails to and from R Haskin regarding Motion to Consolidate; emails to and from and telephone call from D Foley regarding Opposition to Motion to Consolidate	0.08 260.00/hr	19.50
	- LJW Review Docketing Statement and Motion to Consolidate; emails to and from W Smith	0.10 260.00/hr	26.00
10/19/2018	- WJS Review Notice from Court; review Opposition to Motion to Consolidate filed by D Foley	0.08 260.00/hr	19.50
10/23/2018	- WJS Preparation for Hearing; Appearance at Hearing; present Argument in Opposition to Motion to Stay Case pending Appeal; Research; review Nevada State Court Case regarding Fees and Costs Awards; telephone call from Counsel for Disman; conferences with L Wolff and K Christensen; Research regarding Advisory Opinions and Legal Advice from a Judge; review draft Opposition to Motion to Consolidate; review Notices from Court; review Joinder filed by Disman	0.85 260.00/hr	221.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2018	- KBC	Conference with W Smith regarding Hearing, Order and conference with opposing counsel	0.05 260.00/hr	13.00
	- LJW	Review Opposition to Motion to Consolidate Cases; preparation of Responses to Motion to Consolidate Cases; telephone call to W Smith regarding Hearing; Research Attorney's Fees	0.50 260.00/hr	130.00
10/24/2018	- WJS	Review Notices from Supreme Court; review Lyttles' Reply Brief in Support of Consolidating Cases	0.05 260.00/hr	13.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
10/29/2018	- WJS	Emails to and from R Haskin regarding Extension of Briefing Dates and Joint Motion to Consolidate Cases; review draft Stipulations; review Notice from Supreme Court regarding Filings	0.10 260.00/hr	26.00
	- LJW	Review Pleadings in Appeal	0.03 260.00/hr	6.50
11/1/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Consolidate with Boulden Appeal	0.05 260.00/hr	13.00
11/5/2018	- LJW	Review Court Order	0.03 260.00/hr	6.50
11/7/2018	- WJS	Email from Counsel for Dismar; review letter to Court from Counsel for Dismar regarding proposed Summary Judgment Orders; telephone call from Counsel for Dismar	0.10 260.00/hr	26.00
11/15/2018	- LJW	Review Court Order regarding Jurisdiction	0.03 260.00/hr	6.50
11/16/2018	- DEM	Conference with W Smith; revise Stipulation to Extend Discovery; email from W Smith	0.08 260.00/hr	19.50
	- ELJ	Conference with W Smith and D Martin regarding Emergency Motion	0.15 260.00/hr	39.00
	- WJS	Review Notices from District Court regarding Motion to Reconsider and Order Shortening Time; review Motion; Research Caselaw, Reconsideration and Jurisdiction Issues; email to R Haskin regarding Hearing; conferences with E James and D Martin regarding preparation of Response and attending Hearing	0.53 260.00/hr	136.50
11/19/2018	- ELJ	Preparation of Opposition to Motion to Reconsider	0.95 260.00/hr	247.00
	- DEM	Research; email to W Smith; conference with E James	0.25 260.00/hr	65.00
	- KBC	Review Appeal Order and Order Shortening Time regarding Fees Hearing; conference with E James; email to L Wolff	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2018	- LJW	Review Motion to Reconsider and Order Shortening Time; emails to and from Attorneys	0.10 260.00/hr	26.00
11/20/2018	- ELJ	Preparation of Opposition to Motion to Reconsider and review with L Wolff	0.53 260.00/hr	136.50
	- LJW	Preparation of Opposition to Motion to Reconsider; telephone call to E James	0.68 260.00/hr	175.50
11/21/2018	- LJW	Revisions to Opposition to Motion to Reconsider; emails to and from E James and Clerk	0.30 260.00/hr	78.00
11/26/2018	- LJW	Review filed document	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court and Opposition; preparation for Hearing	0.38 260.00/hr	97.50
11/27/2018	- ELJ	Conference with W Smith regarding Motion to Reconsider Attorney's Fees and Finality of Appeal	0.15 260.00/hr	39.00
	- WJS	Preparation for Hearing; Appearance at Hearing on Motion to Reconsider Fees Order and present Arguments in Opposition; conferences with E James and D Martin re outcome and pending Appeal Issues; review Order to Show Cause from Supreme Court; Research Cases cited by Supreme Court; conferences with E James and D Martin; review possible Dismissal of Appeal; emails to and from R Haskin regarding Extension of Time for Briefing in 71698 Appeal; review draft Stipulation	1.08 260.00/hr	279.50
	- LJW	Telephone call with W Smith regarding Hearing and Appeal Issues	0.05 260.00/hr	13.00
11/28/2018	- LJW	Review Stipulation and Order; emails to and from W Smith	0.03 260.00/hr	6.50
12/4/2018	- KBC	Review Supreme Court Appeal Decision; conference with W Smith regarding Procedures and Recommendations	0.10 260.00/hr	26.00
	- LJW	Review Order from Appellate Court; telephone call to W Smith regarding Order; preparation of Response to Order to Show Cause	0.38 260.00/hr	97.50
	- WJS	Review Notice from Nevada Supreme Court regarding Boulden/Lamothe Appeal; review Order Affirming District Court; telephone call from Counsel for Dismans regarding Issues remaining in District Court; telephone call from L Wolff regarding Order, coordination and analysis of Actions to resolve remaining Appeals and Issues; conference with K Christensen	0.48 260.00/hr	123.50
12/5/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeals; preparation of Motion to Dismiss; emails to and from W Smith	0.40 260.00/hr	104.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018 - WJS	Research Attorney's Fees on Appeal; review Supreme Court's 12/4/18 Order and Arguments; file notes; email to L Wolff regarding Issues; emails to and from Haskin, Foley and Wang regarding Supreme Court Order; coordinate Conference Call; emails from L Wolff	0.45 260.00/hr	117.00
12/6/2018 - LJW	Review Court Order regarding Extension	0.03 260.00/hr	6.50
- WJS	Emails to and from opposing counsel regarding Conference Call	0.03 260.00/hr	6.50
12/7/2018 - WJS	Teleconference with Counsel (Haskin, Foley, Wang) regarding Supreme Court Decision and potential Resolution; conference with K Christensen; telephone call to L Wolff; review Supreme Court filing; review CC&Rs; draft letter to R Haskin regarding Dismissal of Appeal and Warning of Sanctions	0.60 260.00/hr	156.00
- KBC	Conference with W Smith; review Appeal and Trial Procedures; review Negotiations Issues	0.10 260.00/hr	26.00
- LJW	Telephone call with W Smith regarding Motions	0.08 260.00/hr	19.50
12/10/2018 - LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.50 260.00/hr	130.00
- WJS	Email from L Wolff; review and revise letter to Haskin; email from D Foley	0.15 260.00/hr	39.00
12/11/2018 - LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.60 260.00/hr	156.00
12/12/2018 - KBC	Review rescheduled Pre-Trial Conference, Calendar Call and Trial Dates for related Case; review emails regarding Fees Brief and Continuance Request	0.05 260.00/hr	13.00
- LJW	Preparation of Response to Order to Show Cause; Research Federal and State Rules regarding Consolidation; emails to and from W Smith; calendar dates for Trial	0.50 260.00/hr	130.00
- WJS	Email to L Wolff; review and redline draft Response to Order to Show Cause	0.60 260.00/hr	156.00
12/13/2018 - LJW	Review Response and Stipulation	0.03 260.00/hr	6.50
- WJS	Revise and draft Response to Order to Show Cause; prepare for filing	0.40 260.00/hr	104.00
12/14/2018 - WJS	Review Notices from Supreme Court; email from D Foley	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2018	- KBC	Conference with Client regarding Appeal Issues and Lytle's Health Extension Request	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Lytle Response to Order to Show Cause	0.05 260.00/hr	13.00
12/18/2018	- LJW	Preparation of Response to Opposition to Order to Show Cause	0.25 260.00/hr	65.00
	- WJS	Emails to and from L Wolff regarding Order to Show Cause; email to D Foley and C Wange regarding Attorney's Fee Appeal; email from D Foley; review Stipulation for Dismissal of Remaining Claims in District Court Case	0.18 260.00/hr	45.50
12/19/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research on Hearing and on Frederic case	0.70 260.00/hr	182.00
	- WJS	Email from C Wang regarding Stipulation for District Court Case; email from R Haskin	0.05 260.00/hr	13.00
12/20/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research 54(b) Certification	0.50 260.00/hr	130.00
12/21/2018	- LJW	Preparation of Response to Lytle's Reply to Order to Show Cause; emails to and from W Smith	0.30 260.00/hr	78.00
	- WJS	Review and revise Response to Lytle's Reply to Order to Show Cause; review docket in District Court Case; email to L Wolff	0.25 260.00/hr	65.00
12/27/2018	- LJW	Review Order and calendar Due Date	0.03 260.00/hr	6.50
	- WJS	Email from R Haskin; review proposed changes to Dismissal Stipulation; review Notice from Supreme Court regarding Briefing Schedule; calendar Deadlines; conference with D Martin regarding Pre-Trial Conference	0.08 260.00/hr	19.50
1/3/2019	- WJS	E-mails from opposing counsel; review Redlines to draft Stipulation	0.08 260.00/hr	19.50
1/7/2019	- DEM	E-mails from and to W Smith; telephone calls to and from W Smith; review file	0.13 260.00/hr	32.50
	- WJS	Review Notice of Hearing; emails to and from and telephone calls to and from D Martin regarding Pre-Trial Conference; emails to and from opposing counsel regarding Stipulation; review draft	0.08 260.00/hr	19.50
1/8/2019	- WJS	Prepare for Pretrial Conference; Meeting with D Foley regarding Stipulation; Appearance for Pre-Trial Conference in Department 9 (D Barker); conference with D Foley regarding Fees and Costs; telephone call from C Wang regarding Appeal Issues, Fees and Costs; conference with K Christensen	0.60 260.00/hr	156.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
1/15/2019	- LJW	Review Stipulation and Order; telephone call to W Smith regarding Brief	0.08 260.00/hr	19.50
	- WJS	Review Notices from Supreme Court and Opening Brief filed by Lytle's in Case No. 76198; telephone call to L Wolff regarding Issues on Appeal, substance of Lytle's Brief; and preparation of Response Brief	0.18 260.00/hr	45.50
1/16/2019	- LJW	Preparation of Reply to Appellant's Brief	1.03 260.00/hr	266.50
	- WJS	Review Notices from District Court; review Boulden & Lamothe Memo of Costs and Motion for Fees	0.15 260.00/hr	39.00
1/17/2019	- WJS	Review and notate Lytle's Opening Brief	0.30 260.00/hr	78.00
1/18/2019	- LJW	Review Court Pleadings	0.03 260.00/hr	6.50
1/19/2019	- LJW	Preparation of Statement of Facts for Reply to Appellate Brief	0.55 260.00/hr	143.00
1/21/2019	- LJW	Preparation of Points and Authorities regarding Law of Case Doctrine	1.00 260.00/hr	260.00
1/22/2019	- LJW	Preparation of Points and Authorities regarding Equitable Orders	0.53 260.00/hr	136.50
1/23/2019	- LJW	Preparation of Points and Authorities regarding Macintosh Caselaw	0.50 260.00/hr	130.00
	- WJS	Review Notice from Court; review Disman's Motion for Fees and Costs; review Docket for Hearing Dates	0.10 260.00/hr	26.00
1/24/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes	0.48 260.00/hr	123.50
1/28/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes; Research "Plain Meaning Cases"	0.28 260.00/hr	71.50
	- WJS	Review Notice from Supreme Court regarding Order Consolidating Appeals; email to L Wolff regarding Response; calendar new Deadlines	0.08 260.00/hr	19.50
1/29/2019	- LJW	Review Court Notice regarding Consolidation; calendar new Due Dates	0.05 260.00/hr	13.00
	- WJS	Review Notice from District Court; review Lytle's Opposition to Boulden/Lamothe Motion for Fees and Costs	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2019	- LJW	Review NRED 3 Litigation; review Opposition to Motion for Fees; preparation of Points and Authorities regarding "Plain Meaning" of Statutes	0.30 260.00/hr	78.00
2/1/2019	- LJW	Preparation of Points and Authorities on Plain Meaning of Statute	0.18 260.00/hr	45.50
2/4/2019	- LJW	Preparation of Points and Authorities on Statute; review Opposition to Motion to Retax Costs	0.18 260.00/hr	45.50
	- WJS	Review Notice from District Court; review Lamothe/Boulden Opposition to Motion to Retax Costs	0.05 260.00/hr	13.00
2/5/2019	- LJW	Preparation of Points and Authorities on Application of NRS 116.3117	0.33 260.00/hr	84.50
2/7/2019	- LJW	Research NRS 116.3117 and Judgment Liens	0.58 260.00/hr	149.50
2/8/2019	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.13 260.00/hr	32.50
2/11/2019	- WJS	E-mail from R Haskin regarding Order on Motion to Reconsider, Analysis and Order Issues	0.08 260.00/hr	19.50
	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.50 260.00/hr	130.00
2/12/2019	- ELJ	Conference with W Smith regarding Mootness of Order and Appeal Issues	0.08 260.00/hr	19.50
	- WJS	Conference with E James regarding Haskin's request; Research; emails to and from R Haskin regarding Motion to Reconsider and Extension Request; Notice from District Court and review Lytle Opposition to Disman Fee Motion; review Notice from Supreme Court and review Lytle Motion for Extension of Time to File Brief in Fees Case; emails to and from L Wolff regarding Extension Request	0.40 260.00/hr	104.00
	- LJW	Preparation of Summary of Facts on Answering Brief; Research Extension of Time to Answer Attorney's Argument Brief; email to W Smith; review Motion by Lytle regarding Extension of Time	0.55 260.00/hr	143.00
2/13/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief; review Court Order regarding Extension of Time	0.20 260.00/hr	52.00
	- WJS	Review Notice and Order from Supreme Court Granting Extension; calendar new Deadlines	0.05 260.00/hr	13.00
2/14/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief	0.45 260.00/hr	117.00
2/18/2019	- LJW	Review Reply to Opposition	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2019	- LJW	Preparation of Statement of Facts for Appellate Response	0.25 260.00/hr	65.00
	- WJS	Review Notices from District Court; review Minute Order	0.03 260.00/hr	6.50
2/21/2019	- LJW	Preparation of Statement of Facts for Appellate Response	0.45 260.00/hr	117.00
2/27/2019	- WJS	Review Notice from District Court regarding Hearing on Motion for Fees and Costs; review Docket	0.08 260.00/hr	20.80
3/13/2019	- WJS	Review Notice from Supreme Court and Motion to Extend; conference with L Wolff; draft and file Response to Motion to Extend	0.35 260.00/hr	91.00
3/14/2019	- WJS	Review Notices from Supreme Court; Research Dockets and Court calendar regarding District Court scheduled Hearings; emails to and from D Foley and C Wang regarding Hearing on Fees Motion	0.13 260.00/hr	32.50
	- LJW	Review Motion to Extend Time; emails to and from W Smith; telephone call to W Smith regarding Motion	0.20 260.00/hr	52.00
3/15/2019	- LJW	Review Reply to Opposition; emails to and from W Smith	0.08 260.00/hr	19.50
	- WJS	Review from Supreme Court; review Reply filed by R Haskin; emails to and from L Wolff	0.08 260.00/hr	19.50
3/19/2019	- LJW	Review Notice from Court	0.03 260.00/hr	6.50
4/10/2019	- WJS	Preparation for and Appearance at Hearing of Fees and Costs Motions filed by other Plaintiffs; review Notice from Court regarding new Hearing Date before Judge Williams; emails to and from opposing counsel	0.35 260.00/hr	91.00
4/22/2019	- LJW	Review filings regarding Extensions of Time; emails to and from W Smith; calendar Due Dates	0.08 260.00/hr	19.50
	- WJS	Review Notice from District Court regarding Order on Stipulation to Continue Hearing; review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule; emails to and from L Wolff; draft and file Opposition to Motion to Continue	0.20 260.00/hr	52.00
4/23/2019	- LJW	Review Motion and Opposition	0.03 260.00/hr	6.50
4/26/2019	- LJW	Review Reply to Opposition	0.03 260.00/hr	6.50
	- KBC	Conference with W Smith regarding Extension Motion and Opposition; calendar Hearing	0.05 260.00/hr	13.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2019	- WJS Review Notice from Supreme Court regarding Lytle Reply Brief; email from D Foley regarding Issues for Hearing; conference with K Christensen regarding status of Case and Briefing Schedule	0.15 260.00/hr	39.00
5/2/2019	- LJW Review Court Order regarding Extension; emails to and from W Smith	0.05 260.00/hr	13.00
	- WJS Review Notice from Supreme Court; review Order Denying Lytle Motion for Extension of Briefing Deadlines; emails to and from L Wolff; email to D Foley and C Wang	0.05 260.00/hr	13.00
5/7/2019	- WJS Review Notice from District Court; review Motion to Set Hearing filed by Lytles	0.08 260.00/hr	19.50
5/15/2019	- WJS Review emails from R Haskin; emails to and from and telephone call from D Foley regarding Hearing; review Court Pleadings and papers and preparation for Hearing	0.15 260.00/hr	39.00
5/16/2019	- WJS Prepare for and attend Hearing at RJC (Judge Williams) on Motions for Fees and Costs (other Plaintiffs); case notes; Notices from Supreme Court regarding Lytle Opening Brief on Fees Appeal; emails to and from L Wolff	0.88 260.00/hr	227.50
	- LJW Review Opening Brief and Appendices	0.15 260.00/hr	39.00
5/17/2019	- WJS Review Notice from District Court and Minute Order Granting Fee Motions	0.05 260.00/hr	13.00
5/20/2019	- LJW Review Court Order	0.03 260.00/hr	6.50
	- WJS Review and annotate Lytle Opening Brief on Fees	0.38 260.00/hr	97.50
5/21/2019	- LJW Telephone call to W Smith regarding Answering Brief; email to Court Clerk regarding Transcript; preparation of Answering Brief	0.38 260.00/hr	97.50
5/22/2019	- LJW E-mails to and from Court Clerk	0.03 260.00/hr	6.50
5/28/2019	- KBC Review Judgment Renewal Notice; emails to and from Attorney	0.05 260.00/hr	13.00
6/3/2019	- LJW Preparation of Reply Brief; Research Standard of Review for Attorney's Fees and Costs on Appeal	0.70 260.00/hr	182.00
6/4/2019	- LJW Research Law of the Case	0.40 260.00/hr	104.00
6/5/2019	- LJW Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	1.00 260.00/hr	260.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	0.88 260.00/hr	227.50
6/7/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees	1.75 260.00/hr	455.00
6/10/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees; telephone call to W Smith regarding Facts Section	1.25 260.00/hr	325.00
	- WJS	Telephone call from L Wolff regarding Arguments for Appeal Brief	0.15 260.00/hr	39.00
6/11/2019	- LJW	Preparation of Reply Brief; review and revise Citations to Law and Record; review Transcript and add to Brief; preparation of Exhibits for Appendix; revise Citations to Appendix	1.75 260.00/hr	455.00
6/12/2019	- LJW	Preparation of Reply Brief; preparation of Fact Section; preparation of Appendix	1.05 260.00/hr	273.00
	- WJS	Review and Redline draft Reply Brief; draft Answering Brief on Consolidated Appeals, Research	1.93 260.00/hr	500.50
6/13/2019	- LJW	Preparation of Appendix; Citations to Record; emails to and from W Smith	0.70 260.00/hr	182.00
	- WJS	Research and draft Answering Brief; review Documents for Respondents' Appendix, preparation of Appendix	1.63 260.00/hr	422.50
6/14/2019	- WJS	Preparation of Respondents' Appendix; review and revise Answering Brief	0.45 260.00/hr	117.00
	- LJW	Preparation of Appendix; revisions to Citations to Record; emails to and from W Smith; review Appellate Rules regarding Appendices and Documents	0.70 260.00/hr	182.00
6/17/2019	- WJS	Preparation of Table of Contents; review and revise Answering Brief; prepare Certifications; sign and prepare Brief and Appendix for filing	1.65 260.00/hr	429.00
6/18/2019	- WJS	Review Notice from Court; emails to and from L Wolff; review Notice form Court	0.05 260.00/hr	13.00
6/19/2019	- WJS	Review Order, make adjustments to Brief and prepare for filing; conference with Clerk regarding filing; review Court Notices regarding Acceptance of Filing	0.15 260.00/hr	39.00
	- LJW	Review Appellate Motion	0.05 260.00/hr	13.00
7/15/2019	- WJS	Emails to and from R Haskin; review Agreement and Appellant filings	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2019	- WJS	Email from R Haskin; review draft Extension Stipulation; review Notices from Supreme Court	0.03 260.00/hr	6.50
8/5/2019	- WJS	Emails to and from R Haskin; review and approve Stipulation	0.03 260.00/hr	6.50
8/19/2019	- WJS	Review Notice from Supreme Court; review Motion and Lytle Reply Brief; email to L Wolff	0.15 260.00/hr	39.00
8/20/2019	- LJW	Review Motions and Research Brief and Opposition	0.28 260.00/hr	71.50
8/21/2019	- WJS	Emails to and from L Wolff regarding Response to Lytle Reply Brief	0.05 260.00/hr	13.00
	- LJW	Review Motions and Research Brief and Opposition; emails to and from W Smith	0.58 260.00/hr	149.50
8/22/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.65 260.00/hr	169.00
8/23/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.55 260.00/hr	143.00
8/26/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit; emails to and from W Smith	0.60 260.00/hr	156.00
	- WJS	Review and revise Opposition and Countermotion; review Notice from Court	0.10 260.00/hr	26.00
8/27/2019	- LJW	Review and download Court Order	0.03 260.00/hr	6.50
9/3/2019	- LJW	Review and download Pleading	0.03 260.00/hr	6.50
9/4/2019	- WJS	Review Supreme Court filings from Lytles; emails to and from Counsel for Dismar regarding Stay of Execution and Fees Order	0.08 260.00/hr	19.50
9/30/2019	- WJS	Review Notice from Court regarding Appeal of Attorneys Fee Order; review Supreme Court Docket regarding Appeal	0.08 260.00/hr	19.50
10/1/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
10/4/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Appeal of Boulden/Lamothe Fee Order	0.03 260.00/hr	6.50
10/22/2019	- WJS	Review Notice from District Court regarding Stipulation to Stay Execution, Posting on Bond; review Notice from Supreme court regarding Association of Counsel for Lytle	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2019	- WJS	Review Notices from Court regarding Appearance for Lytle and request for Transcripts	0.03 260.00/hr	6.50
12/4/2019	- KBC	Conference with W Smith regarding Hearing and Order Appointing HOA Receiver	0.06 260.00/hr	16.25
	- WJS	Telephone call from K Christensen regarding Appointment of Receiver over Association, review Case History and Minutes of Proceedings; email to K Christensen and email to Clerk	0.20 260.00/hr	52.00
1/13/2020	- LJW	Review Court order regarding Lamothe	0.03 260.00/hr	6.50
1/21/2020	- WJS	Review Order from Supreme Court; Research; draft Response	0.35 260.00/hr	91.00
1/24/2020	- WJS	Conference with K Christensen and K Kearl regarding Receiver; review Case file; email to K Christensen with documents; conference with K Christensen	0.30 260.00/hr	78.00
	- KBC	Review Orders; Research; telephone call from Client regarding HOA Judgment and Receiver correspondence; conference with Client and W Smith; review CCRs, Receiver Documents and preparation for conference with Client	0.48 260.00/hr	123.50
1/27/2020	- WJS	Research; conference with K Christensen; preparation for conference with Clients; telephone call from C Wang; conference with Clients; draft letter to Receiver; email to L Wolff	0.75 260.00/hr	195.00
	- KBC	Review Receiver letter and Orders; review Injunction; Research; conference with W Smith regarding Contempt, Fees, Motion to Vacate and Sanctions; conference with Clients regarding Demand and Motions	0.63 260.00/hr	162.50
1/28/2020	- DEM	Conference with W Smith; review letter to Receiver	0.18 260.00/hr	45.50
	- WJS	Emails to and from L Wolff; draft letter to Receiver; Research; conference with D Martin regarding revisions; preparation of Exhibits; email to K Christensen; conference with K Christensen	0.60 260.00/hr	156.00
	- KBC	Review letter to Receiver and Attorney; email to Attorney; conference with W Smith	0.06 260.00/hr	16.25
	- LJW	Review letter to Client and Court filings; email to W Smith	0.13 260.00/hr	32.50
1/29/2020	- LJW	E-mails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Emails to and from D Foley regarding letter from Receiver; revise letter to Receiver; email from J Gegen; email to Clients	0.13 260.00/hr	32.50

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			Hrs/Rate	Amount
2/3/2020	- LJW	E-mails to and from W Smith; preparation of Motion for Order to Show Cause	0.50 260.00/hr	130.00
	- WJS	Review follow-up letter from Receiver; conference with K Christensen; email to L Wolff regarding drafting Motion	0.05 260.00/hr	13.00
	- KBC	Review letter from Receiver canceling Meeting; conference with W Smith; conference with Client	0.06 260.00/hr	16.25
2/4/2020	- KBC	Conference with W Smith regarding Motion for OTSC and Contempt; emails to and from Attorney regarding Motion; review Hearing Notice	0.06 260.00/hr	16.25
	- WJS	Review notification from Court; review Motion to Reduce to Judgment from old Case; conference with K Christensen; Research Dockets; conference with L Wolff regarding Motion	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith; preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.90 260.00/hr	234.00
2/5/2020	- WJS	E-mail from J Gegen; review letters	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.38 260.00/hr	97.50
2/6/2020	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.28 260.00/hr	71.50
2/10/2020	- WJS	E-mails to and from D Foley; review Renewed Motion to Appoint Receiver; messages to and from L Wolff; Research	0.40 260.00/hr	104.00
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.53 260.00/hr	136.50
2/11/2020	- KBC	Calendar Hearing; conference with W Smith; review Motion	0.03 260.00/hr	6.50
	- WJS	Messages to and from L Wolff regarding Receiver Report	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	1.00 260.00/hr	260.00
2/12/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegan; preparation of Affidavit for W Smith	1.93 260.00/hr	500.50
2/13/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegan; preparation of Affidavit for W Smith	1.08 260.00/hr	279.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2020	- WJS E-mail from L Wolff; review and revise Motion for Order to Show Cause	0.25 260.00/hr	65.00
	- LJW Preparation of Motion to Intervene	1.03 260.00/hr	266.50
2/18/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.63 260.00/hr	162.50
2/19/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.80 260.00/hr	208.00
2/20/2020	- LJW Preparation of Motion to Strike Order	0.80 260.00/hr	208.00
2/21/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	0.80 260.00/hr	208.00
	- LJW Preparation of Motion to Intervene	0.55 260.00/hr	143.00
2/22/2020	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/24/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	1.05 260.00/hr	273.00
	- LJW Preparation of Motion to Intervene	0.73 260.00/hr	188.50
2/25/2020	- WJS Drafting and revisions to Motion for Order to Show Cause; Research; email to L Wolff	1.30 260.00/hr	338.00
	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/26/2020	- WJS E-mails to and from L Wolff	0.03 260.00/hr	6.50
	- LJW Preparation of Motion to Intervene	0.53 260.00/hr	136.50
3/2/2020	- WJS Review and revise Motion to Intervene; Research; review Notice from Nevada Supreme Court; review Order Submitting for Decision; draft Affidavits; review Notice from NSC; review Order of Affirmance; conference with K Christensen; revisions to Motion for Order to Show Cause and Motion to Intervene	1.50 260.00/hr	390.00
3/3/2020	- WJS E-mails to and from L Wolff; review and revise Motions and Affidavits; emails to Client regarding Affidavits; preparation of Exhibits; meet with Zobrist and Kearl; telephone call from L Wolff	0.70 260.00/hr	182.00
	- LJW Review Affirmance Order from Supreme Court; telephone call to W Smith	0.10 260.00/hr	26.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2020	- WJS Emails to and from D Foley and C Wang; Research Court Rules; draft Bill of Costs on Appeal; Research Supersedeas Bond; notes to file; meet with Julie Gegen regarding Affidavits; revisions to Motions; prepare Motions and Exhibits for filing	0.65 260.00/hr	169.00
3/5/2020	- WJS Review Notices from Court regarding Hearings, calendar and send emails to Counsel; draft Bill of Costs; finalize and prepare for filing; review Notices from Supreme Court	0.18 260.00/hr	45.50
3/6/2020	- KBC Conference with W Smith regarding proposed Motion and Hearing Stipulation and Issues; review email from new opposing counsel	0.09 260.00/hr	22.75
	- WJS Review Notice; review Joinders filed by C Wang and D Foley; email to Clients; email from D Waite regarding Stipulation to Intervene; conference with K Christensen	0.20 260.00/hr	52.00
3/9/2020	- WJS Research Intervention Rules; telephone call from D Waite regarding Stipulation to Intervene; telephone call from C Wang; telephone call from R Disman; email from D Waite and review and redline draft Stipulation; review Court Notices	0.60 260.00/hr	156.00
	- LJW Review Pleadings; email to W Smith	0.03 260.00/hr	6.50
3/10/2020	- KBC Conference with W Smith regarding requested Stipulation to Intervene, OTSC, Attorney's Fees and Receiver Issues; review Attorney emails	0.10 260.00/hr	26.00
	- WJS E-mails from D Waite regarding Settlement Offer and Stipulation on Motion to Intervene; conference with K Christensen; draft revisions to Stipulation; emails to and from L Wolff; emails to and from D Waite; telephone call from D Foley; conference with Clerk regarding Fees Statements	0.35 260.00/hr	91.00
	- LJW Review revised Stipulation and Order; emails to and from W Smith	0.05 260.00/hr	13.00
3/11/2020	- WJS E-mails from D Waite; review and analysis of Stipulation redline; preparation for Status Hearing in Receiver Action; check Docket; email to Counsel for Receiver	0.40 260.00/hr	104.00
	- LJW Preparation of Motion to Set Aside Order	0.78 260.00/hr	201.50
3/12/2020	- KBC Conference with W Smith; preparation of Motion to Vacate Order; review D Waitz letter to Receiver	0.08 260.00/hr	19.50
	- ELJ Meeting with W Smith regarding opposing Arguments (.7); Research Caselaw on Unclean Hands and Fraud on Court; email to W Smith and L Wolff with Caselaw and Arguments	0.65 260.00/hr	169.00
	- WJS Preparation for Hearing; Appearance at Status Hearing in Receivership Case; telephone call to L Wolff regarding Motion; email from Receiver's Counsel, review January Status Report; letter from D Waite - analysis; conference with Clerk regarding	1.20 260.00/hr	312.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020 - LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020 - WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020 - WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020 - WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020 - LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020 - WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020 - WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020 - LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020 - LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2020	- WJS	Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS	Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW	Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS	Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW	Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS	Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS	Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS	Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2020	- WJS	0.28 260.00/hr	71.50
	Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff		
	- LJW	1.48 260.00/hr	383.50
	Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date		
4/11/2020	- LJW	0.38 260.00/hr	97.50
	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion		
4/13/2020	- WJS	2.38 260.00/hr	617.50
	Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley		
	- LJW	1.75 260.00/hr	455.00
	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall		
4/14/2020	- LJW	1.85 260.00/hr	481.00
	Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk		
	- WJS	1.25 260.00/hr	325.00
	Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff		
4/15/2020	- WJS	1.20 260.00/hr	312.00
	E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff		
	- LJW	0.05 260.00/hr	13.00
	Review filings and emails; email to W Smith		
4/16/2020	- DEM	0.25 260.00/hr	65.00
	Research recent Nevada HOA Caselaw; email to W Smith		
4/17/2020	- WJS	0.10 260.00/hr	26.00
	E-mail from D Martin and review new Supreme Court Opinion		
4/20/2020	- LJW	0.30 260.00/hr	78.00
	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond		

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2020	- WJS	Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020	- WJS	Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
	- LJW	Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020	- KBC	Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
	- WJS	Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
	- LJW	Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020	- LJW	Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
	- WJS	Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020	- WJS	Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
	- LJW	Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020	- WJS	E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020	- LJW	Review emails and revised Order	0.05 260.00/hr	13.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2020 - LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
	For professional services rendered	144.28	\$37,350.80
	Additional Charges :		
		<u>Qty/Price</u>	
5/24/2018 - N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018 - LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018 - N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018 - N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018 - N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018 - N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018 - N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018 - N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018 - N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018 - N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018 - N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018 - N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018 - N	Clark County District Court Download Fee	0.25 2.00	0.50

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		<u>Qty/Price</u>	<u>Amount</u>
8/31/2018 - N	WestLaw Research 8/1-8/31/18	0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)	0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs	0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18	0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay	0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18	0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider	0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18	0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider	0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)	0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)	0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019	0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal	0.25 443.54	110.89
6/30/2019 - N	WestLaw Research	0.25 301.54	75.39
8/31/2019 - N	WestLaw Research	0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020	0.25 31.81	7.95

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			<u>Qty/Price</u>	<u>Amount</u>
2/4/2020 - N	Clark County District Court Document Download - Order on Receivership		0.25 5.50	1.38
2/5/2020 - N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver		0.25 101.97	25.49
2/11/2020 - N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses		0.25 19.00	4.75
2/29/2020 - N	WestLaw Research - February 2020		0.25 528.58	132.15
3/4/2020 - N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders		0.25 3.50	0.88
- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure		0.25 356.79	89.20
3/11/2020 - N	Court Parking Expense at Hearing		0.25 6.00	1.50
3/26/2020 - N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order		0.25 3.50	0.88
3/31/2020 - N	WestLaw Research (March 2020)		0.25 683.39	170.85
4/10/2020 - N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)		0.25 3.50	0.88
4/13/2020 - N	District Court Filing Fee - Notice to Appear (A-18-775843-C)		0.25 3.50	0.88
4/14/2020 - N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)		0.25 3.50	0.88
4/15/2020 - N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)		0.25 51.00	12.75
4/30/2020 - N	WestLaw Research April 2020		0.25 250.87	62.72

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		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	<u>144.28</u>	\$38,387.07

000445

000445

Exhibit I

000446

Exhibit I

History of Billing

September Trust, dated March 23, 1972

1861 Rosemere Ct.
Las Vegas, NV 89117

Professional Services

		Hrs/Rate	Amount
5/23/2018	- LJW	0.43 260.00/hr	110.50
5/24/2018	- LJW	0.48 260.00/hr	123.50
	- WJS	0.25 260.00/hr	65.00
5/28/2018	- LJW	0.03 260.00/hr	6.50
5/29/2018	- LJW	0.63 260.00/hr	162.50
5/30/2018	- LJW	0.58 260.00/hr	149.50
5/31/2018	- DEM	0.13 260.00/hr	32.50
	- LJW	0.38 260.00/hr	97.50
	- WJS	1.38 260.00/hr	357.50

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2018	- WJS	Revise Motion, Declaration and Memo of Costs; conference with Clerk regarding Fee Statements; email to L Wolff; review Rules regarding Timing	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith regarding Motion for Attorney's Fees and Costs; telephone call with Clerk regarding redaction of Bills; review revisions to Motion	0.13 260.00/hr	32.50
6/4/2018	- WJS	Emails to and from L Wolff; revise Fees Motion and related Documents	0.20 260.00/hr	52.00
	- LJW	Review and revise Memorandum of Costs, Declaration of W. Smith, Motion for Attorney's Fees and Costs, Exhibits and update Summary of Fees and Costs; telephone call to Clerk regarding redaction and filing updated Billing Summary	0.55 260.00/hr	143.00
6/5/2018	- WJS	Review Notices from Court; review filings; calendar Hearing Date; email to L Wolff regarding Notice of Hearing	0.08 260.00/hr	19.50
6/6/2018	- LJW	Preparation of Notice of Hearing; emails to and from W Smith regarding Notice; emails to and from Clerk regarding Notice; review filed Pleadings	0.15 260.00/hr	39.00
6/11/2018	- LJW	Review Motion to Retax Costs; email to W Smith regarding Motion; email to Clerk regarding Receipts; Research Evidence of Costs	0.43 260.00/hr	110.50
6/12/2018	- LJW	Research Memorandum and Evidence of Costs; telephone call to Clerk regarding Receipts and Spreadsheet; preparation of Opposition to Motion to Retax Costs	0.48 260.00/hr	123.50
6/13/2018	- WJS	Email from R Haskin; emails to and from L Wolff; review NRAP; emails to and from R Haskin regarding Request for Stipulation on Appeal Reply	0.20 260.00/hr	52.00
	- LJW	Preparation of Opposition to Motion to Retax Costs; emails to and from W Smith regarding request to file Reply; Research Issues related to Replies to Amicus Brief; telephone call with Clerk regarding Costs	0.58 260.00/hr	149.50
6/14/2018	- LJW	Research Costs Awarded by District Courts and preparation of Opposition to Motion to Retax Costs	0.33 260.00/hr	84.50
6/15/2018	- WJS	Emails to and from L Wolff; review and revise Opposition to Motion to Retax Costs and Support Declarations; telephone call from L Wolff; conference with K Christensen	0.38 260.00/hr	97.50
	- LJW	Preparation of Opposition to Motion to Retax Costs; revisions to Motion; preparation of Declaration for Opposition; preparation of Exhibits for Opposition; emails to and from W Smith; emails to and from Clerk	0.95 260.00/hr	247.00
6/19/2018	- WJS	Review Notices from Court; review Notice of Appeal and Appeal Statement filed by Lytles; review Property Records regarding Recorded Releases; review NRAP regarding timing and Appeal; review Notice from Supreme Court; review Motion for Leave to File	0.35 260.00/hr	91.00

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Response to Amicus Brief; email to D Foley and C Wang regarding Motion and Appeal Issues		
6/19/2018	- KBC	Conference with W Smith regarding Appeal Notice and Fees Motion; calendar Brief Due Dates	0.05 260.00/hr	13.00
6/20/2018	- WJS	E-mails to and from D Foley; draft Opposition to Motion for Leave to Respond to Amicus Brief; email to D Foley	0.55 260.00/hr	143.00
	- LJW	Review Motion to File Amicus Brief; emails to and from W Smith regarding Amicus	0.10 260.00/hr	26.00
6/22/2018	- LJW	Review Releases	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court; review Opposition to Motion for Fees; email to L Wolff regarding Reply; review Notice from Supreme Court; review Response to Motion to Respond to Amicus Brief (filed by Foley)	0.10 260.00/hr	26.00
6/25/2018	- LJW	Review Pleadings; emails to and from W Smith regarding Motion	0.05 260.00/hr	13.00
6/26/2018	- KBC	Conference with W Smith regarding Fees Motion, Appeal Brief, Consolidation and Client conference for Instructions	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court regarding Docketing of Notice of Appeal; review Record Transmitted by District Court; conference with K Christensen; email to Clients	0.23 260.00/hr	58.50
6/27/2018	- LJW	Review Opposition; preparation of Reply to Opposition	0.18 260.00/hr	45.50
6/28/2018	- LJW	Research Arbitration Requirement and CC&Rs; preparation of Reply to Opposition	0.73 260.00/hr	188.50
	- WJS	Review Notice from District Court; review Disman's Motion for Summary Judgment; emails to and from L Wolff	0.08 260.00/hr	19.50
6/29/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees	0.38 260.00/hr	97.50
7/2/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; Research NRS 38.310	1.18 260.00/hr	305.50
	- KBC	Review Disman's Motion for Summary Judgment; conference with Clerk; calendar Hearing	0.10 260.00/hr	26.00
7/3/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply	0.85 260.00/hr	221.00
7/5/2018	- WJS	Email from and telephone calls to and from L Wolff regarding Arguments for Reply Brief; review and revise Reply on Motion for Fees and Costs; Research; emails to and from L Wolff	0.45 260.00/hr	117.00

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2018	- LJW	Preparation of Reply to Opposition to Motion for Attorney's Fees; preparation of Affidavit for Reply; telephone call to W Smith; email to Clerk regarding filing; Research Liens and Possessor Interests; Research Lytles Defenses regarding recording Liens	0.83 260.00/hr	214.50
7/6/2018	- LJW	Review Order; calendar Hearing Date	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Rescheduled Hearing; emails to and from R Haskin and C Wang regarding Hearing Date	0.05 260.00/hr	13.00
7/20/2018	- LJW	E-mails to and from W Smith regarding Transcript; Research on Appellate Rules and Transcripts; email to opposing counsel	0.38 260.00/hr	97.50
7/23/2018	- WJS	Review Notice from Supreme Court; review Order Denying Motion to Respond to Amicus Brief	0.08 260.00/hr	19.50
7/24/2018	- WJS	E-mail from Counsel for Lytle; review Hearing Transcripts	0.10 260.00/hr	26.00
7/25/2018	- WJS	Review Motions, Oppositions, Replies and Exhibits related to Fees and Costs; prepare for Hearing on Motion	0.45 260.00/hr	117.00
7/26/2018	- WJS	Prepare for, attend and present Oral Argument at Hearing on Motion for Attorney's Fees and Costs; conference with C Wang regarding Disman Motion for Summary Judgment; review Docket and Opposition; conference with E James regarding Hearing; telephone call from C Wang	1.03 260.00/hr	266.50
7/27/2018	- KBC	Review Hearing Notice; calendar Hearing on Motion for Summary Judgment; conference with W Smith	0.03 260.00/hr	6.50
7/30/2018	- LJW	Review Case Statement; emails to and from opposing counsel; emails to W Smith; review Orders and Motions	0.15 260.00/hr	39.00
8/2/2018	- LJW	Review and download Pleadings filed by Dismans and Lytles	0.13 260.00/hr	32.50
8/6/2018	- LJW	E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS	Review Court Notices and Reply Brief from Dismans; emails to and from L Wolf regarding Hearing	0.23 260.00/hr	58.50

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/7/2018	- WJS E-mails to and from L Wolff and D Foley regarding Boulden & Lamothe Fee Motion; review Transcripts; preparation for Hearing	0.33 260.00/hr	84.50
	- LJW Review Court Record regarding Attorney's Fees Motion; Research ruling in Boulden/Lamothe Case; emails to and from W Smith; Research Special Damages Cases	0.40 260.00/hr	104.00
8/8/2018	- LJW Review emails from Counsel for Boulden; emails to and from W Smith	0.03 260.00/hr	6.50
8/9/2018	- WJS Preparation for Hearing; attend Hearing on Fees and Costs Motion and Dismans Motion for Summary Judgment; file notes regarding Court Decision; conference with D Foley and C Wang at Courthouse regarding outcome of Hearing, Appeal Issues and strategy; conference with K Christensen regarding Court Order; Research Supersedeas Bonds; email to L Wolff regarding Summary of Court Decision and draft Order; telephone call from L Wolff regarding draft Order	0.80 260.00/hr	208.00
	- KBC Conference with W Smith; review Order, Entry and Recording Procedures	0.05 260.00/hr	13.00
	- LJW Telephone call to W Smith regarding Hearing and Case; preparation of Order	0.08 260.00/hr	19.50
8/10/2018	- LJW Preparation of proposed Order	0.18 260.00/hr	45.50
8/13/2018	- LJW Preparation of proposed Order; texts to and from W Smith	0.50 260.00/hr	130.00
8/14/2018	- LJW Preparation of proposed Order; review Motion; Research applicable NRS Statutes; email to W Smith	0.58 260.00/hr	149.50
8/15/2018	- LJW E-mails to and from W Smith	0.03 260.00/hr	6.50
	- WJS E-mails from and to R Haskin; review and revise draft Order on Fees and Costs	0.35 260.00/hr	91.00
8/16/2018	- WJS Emails to and from R Haskin regarding draft Fee Order	0.03 260.00/hr	6.50
8/20/2018	- WJS Email from R Haskin; review and analyze redlines to draft Order; redline revisions to draft Order; emails to and from R Haskin; prepare draft Order; email to all Counsel	0.23 260.00/hr	58.50
8/21/2018	- DEM Conference with W Smith	0.08 260.00/hr	19.50
	- WJS E-mails to and from R Haskin and D Foley	0.03 260.00/hr	6.50

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/28/2018	- LJW	Review and download Order; review Rules regarding Appeal Statement; email to W Smith	0.08 260.00/hr	19.50
9/12/2018	- WJS	Review Order; conference with Clerk regarding filing	0.03 260.00/hr	6.50
9/13/2018	- WJS	Review Order; conference with Clerk; review draft Notice of Entry of Order; review Notices from Court regarding filing Order and Notice of Entry; review Notice from NV Supreme Court regarding Submission of Boulden/Lamothe Appeal for Decision without Oral Argument; conference with K Christensen	0.08 260.00/hr	19.50
9/14/2018	- LJW	Review Notice of Appeal and Order regarding Hearing; emails to and from W Smith	0.10 260.00/hr	26.00
9/18/2018	- WJS	Review Amended Docketing Statement of Appeal	0.05 260.00/hr	13.00
	- LJW	Review Pleading Statement	0.10 260.00/hr	26.00
9/21/2018	- WJS	Review Notices from Supreme Court regarding Attorney's Fees Appeal; review Notice from District Court regarding Order Denying Disman Motion for Summary Judgment; telephone call from C Wang	0.15 260.00/hr	39.00
9/24/2018	- KBC	Conference with Attorney; review Research; telephone call to Client regarding Fees Order Recordation	0.08 260.00/hr	19.50
	- LJW	Review and download Case Appeal and other Pleadings	0.08 260.00/hr	19.50
	- WJS	Email from R Haskin; Research Judgment, Appeal, Stay and Supersedeas Bond Statutes and Caselaw; emails to and from and conference with K Christensen; review Judgment Lien and Recording Procedures; draft Affidavit for Recording Judgment; conference with Clerk regarding Certified Judgment; review Certified Judgment and prepare for Recording	0.65 260.00/hr	169.00
10/1/2018	- WJS	Research and draft Response to Motion to Stay and Post Supersedeas Bond; prepare for filing; review Notice from Court; review Appeal Statement	0.50 260.00/hr	130.00
	- LJW	Review Pleadings and Orders filed	0.03 260.00/hr	6.50
	- ELJ	Review Opposition to Motion to Stay Judgment and Deposit Bond	0.05 260.00/hr	13.00
10/2/2018	- WJS	Review Notices from Court; emails to and from L Wolff regarding Appeal Deadlines; email from C Wang; review draft Order Denying Disman's Motion for Summary Judgment; email to C Wang with Comments	0.30 260.00/hr	78.00

September Trust, dated March 23, 1972

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		Hrs/Rate	Amount
10/3/2018	- WJS Telephone call from C Wang regarding draft Order on Disman Motion for Summary Judgment; Research Case impact; telephone call and email from Haskin's Office; review Stipulation to Continue Hearing on Stay and Bond; emails to and from Court; review Filings	0.15 260.00/hr	39.00
	- LJW Review all Appellate Proceedings; Research and calendar Due Dates for Briefing Schedules; emails to and from W Smith	0.25 260.00/hr	65.00
10/4/2018	- KBC Review Order regarding Settlement Program Exemption; calendar Appeal Brief Due Date; conference with W Smith	0.05 260.00/hr	13.00
10/8/2018	- KBC Conference with W Smith regarding Appeal Consolidation Issues	0.05 260.00/hr	13.00
	- LJW E-mails to and from W Smith; review filed Pleadings	0.08 260.00/hr	19.50
	- WJS Draft email to Clients regarding update on Case; emails to and from L Wolff regarding Appeal Issues and potential Consolidation or Stay of later Appeals; conference with K Christensen	0.25 260.00/hr	65.00
10/9/2018	- LJW E-mails to and from W Smith; review Pleadings	0.03 260.00/hr	6.50
	- WJS Revise and send email to Clients regarding Case update and Recommendation on Appeals	0.05 260.00/hr	13.00
	- KBC Review Appeal Options and email	0.05 260.00/hr	13.00
10/17/2018	- WJS Review Notices from Supreme Court; review Motions to Consolidate Cases from Haskin; emails to and from Haskin to clarify Motion to Consolidate Request and Briefing; review Docketing Statement for Case	0.20 260.00/hr	52.00
10/18/2018	- WJS Emails to and from R Haskin regarding Motion to Consolidate; emails to and from and telephone call from D Foley regarding Opposition to Motion to Consolidate	0.08 260.00/hr	19.50
	- LJW Review Docketing Statement and Motion to Consolidate; emails to and from W Smith	0.10 260.00/hr	26.00
10/19/2018	- WJS Review Notice from Court; review Opposition to Motion to Consolidate filed by D Foley	0.08 260.00/hr	19.50
10/23/2018	- WJS Preparation for Hearing; Appearance at Hearing; present Argument in Opposition to Motion to Stay Case pending Appeal; Research; review Nevada State Court Case regarding Fees and Costs Awards; telephone call from Counsel for Disman; conferences with L Wolff and K Christensen; Research regarding Advisory Opinions and Legal Advice from a Judge; review draft Opposition to Motion to Consolidate; review Notices from Court; review Joinder filed by Disman	0.85 260.00/hr	221.00

September Trust, dated March 23, 1972

		Hrs/Rate	Amount
10/23/2018	- KBC Conference with W Smith regarding Hearing, Order and conference with opposing counsel	0.05 260.00/hr	13.00
	- LJW Review Opposition to Motion to Consolidate Cases; preparation of Responses to Motion to Consolidate Cases; telephone call to W Smith regarding Hearing; Research Attorney's Fees	0.50 260.00/hr	130.00
10/24/2018	- WJS Review Notices from Supreme Court; review Lytles' Reply Brief in Support of Consolidating Cases	0.05 260.00/hr	13.00
	- LJW Review Pleadings in Appeal	0.03 260.00/hr	6.50
10/29/2018	- WJS Emails to and from R Haskin regarding Extension of Briefing Dates and Joint Motion to Consolidate Cases; review draft Stipulations; review Notice from Supreme Court regarding Filings	0.10 260.00/hr	26.00
	- LJW Review Pleadings in Appeal	0.03 260.00/hr	6.50
11/1/2018	- WJS Review Notice from Supreme Court; review Order Denying Motion to Consolidate with Boulden Appeal	0.05 260.00/hr	13.00
11/5/2018	- LJW Review Court Order	0.03 260.00/hr	6.50
11/7/2018	- WJS Email from Counsel for Disman; review letter to Court from Counsel for Disman regarding proposed Summary Judgment Orders; telephone call from Counsel for Disman	0.10 260.00/hr	26.00
11/15/2018	- LJW Review Court Order regarding Jurisdiction	0.03 260.00/hr	6.50
11/16/2018	- DEM Conference with W Smith; revise Stipulation to Extend Discovery; email from W Smith	0.08 260.00/hr	19.50
	- ELJ Conference with W Smith and D Martin regarding Emergency Motion	0.15 260.00/hr	39.00
	- WJS Review Notices from District Court regarding Motion to Reconsider and Order Shortening Time; review Motion; Research Caselaw, Reconsideration and Jurisdiction Issues; email to R Haskin regarding Hearing; conferences with E James and D Martin regarding preparation of Response and attending Hearing	0.53 260.00/hr	136.50
11/19/2018	- ELJ Preparation of Opposition to Motion to Reconsider	0.95 260.00/hr	247.00
	- DEM Research; email to W Smith; conference with E James	0.25 260.00/hr	65.00
	- KBC Review Appeal Order and Order Shortening Time regarding Fees Hearing; conference with E James; email to L Wolff	0.05 260.00/hr	13.00

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			Hrs/Rate	Amount
11/19/2018	- LJW	Review Motion to Reconsider and Order Shortening Time; emails to and from Attorneys	0.10 260.00/hr	26.00
11/20/2018	- ELJ	Preparation of Opposition to Motion to Reconsider and review with L Wolff	0.53 260.00/hr	136.50
	- LJW	Preparation of Opposition to Motion to Reconsider; telephone call to E James	0.68 260.00/hr	175.50
11/21/2018	- LJW	Revisions to Opposition to Motion to Reconsider; emails to and from E James and Clerk	0.30 260.00/hr	78.00
11/26/2018	- LJW	Review filed document	0.10 260.00/hr	26.00
	- WJS	Review Notice from Court and Opposition; preparation for Hearing	0.38 260.00/hr	97.50
11/27/2018	- ELJ	Conference with W Smith regarding Motion to Reconsider Attorney's Fees and Finality of Appeal	0.15 260.00/hr	39.00
	- WJS	Preparation for Hearing; Appearance at Hearing on Motion to Reconsider Fees Order and present Arguments in Opposition; conferences with E James and D Martin re outcome and pending Appeal Issues; review Order to Show Cause from Supreme Court; Research Cases cited by Supreme Court; conferences with E James and D Martin; review possible Dismissal of Appeal; emails to and from R Haskin regarding Extension of Time for Briefing in 71698 Appeal; review draft Stipulation	1.08 260.00/hr	279.50
	- LJW	Telephone call with W Smith regarding Hearing and Appeal Issues	0.05 260.00/hr	13.00
11/28/2018	- LJW	Review Stipulation and Order; emails to and from W Smith	0.03 260.00/hr	6.50
12/4/2018	- KBC	Review Supreme Court Appeal Decision; conference with W Smith regarding Procedures and Recommendations	0.10 260.00/hr	26.00
	- LJW	Review Order from Appellate Court; telephone call to W Smith regarding Order; preparation of Response to Order to Show Cause	0.38 260.00/hr	97.50
	- WJS	Review Notice from Nevada Supreme Court regarding Boulden/Lamothe Appeal; review Order Affirming District Court; telephone call from Counsel for Dismans regarding Issues remaining in District Court; telephone call from L Wolff regarding Order, coordination and analysis of Actions to resolve remaining Appeals and Issues; conference with K Christensen	0.48 260.00/hr	123.50
12/5/2018	- LJW	Preparation of Response to Order to Show Cause; Research Consolidation and Appeals; preparation of Motion to Dismiss; emails to and from W Smith	0.40 260.00/hr	104.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018	- WJS Research Attorney's Fees on Appeal; review Supreme Court's 12/4/18 Order and Arguments; file notes; email to L Wolff regarding Issues; emails to and from Haskin, Foley and Wang regarding Supreme Court Order; coordinate Conference Call; emails from L Wolff	0.45 260.00/hr	117.00
12/6/2018	- LJW Review Court Order regarding Extension	0.03 260.00/hr	6.50
	- WJS Emails to and from opposing counsel regarding Conference Call	0.03 260.00/hr	6.50
12/7/2018	- WJS Teleconference with Counsel (Haskin, Foley, Wang) regarding Supreme Court Decision and potential Resolution; conference with K Christensen; telephone call to L Wolff; review Supreme Court filing; review CC&Rs; draft letter to R Haskin regarding Dismissal of Appeal and Warning of Sanctions	0.60 260.00/hr	156.00
	- KBC Conference with W Smith; review Appeal and Trial Procedures; review Negotiations Issues	0.10 260.00/hr	26.00
	- LJW Telephone call with W Smith regarding Motions	0.08 260.00/hr	19.50
12/10/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.50 260.00/hr	130.00
	- WJS Email from L Wolff; review and revise letter to Haskin; email from D Foley	0.15 260.00/hr	39.00
12/11/2018	- LJW Preparation of Response to Order to Show Cause; Research Consolidation and Appeal	0.60 260.00/hr	156.00
12/12/2018	- KBC Review rescheduled Pre-Trial Conference, Calendar Call and Trial Dates for related Case; review emails regarding Fees Brief and Continuance Request	0.05 260.00/hr	13.00
	- LJW Preparation of Response to Order to Show Cause; Research Federal and State Rules regarding Consolidation; emails to and from W Smith; calendar dates for Trial	0.50 260.00/hr	130.00
	- WJS Email to L Wolff; review and redline draft Response to Order to Show Cause	0.60 260.00/hr	156.00
12/13/2018	- LJW Review Response and Stipulation	0.03 260.00/hr	6.50
	- WJS Revise and draft Response to Order to Show Cause; prepare for filing	0.40 260.00/hr	104.00
12/14/2018	- WJS Review Notices from Supreme Court; email from D Foley	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2018	- KBC	Conference with Client regarding Appeal Issues and Lytle's Health Extension Request	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Lytle Response to Order to Show Cause	0.05 260.00/hr	13.00
12/18/2018	- LJW	Preparation of Response to Opposition to Order to Show Cause	0.25 260.00/hr	65.00
	- WJS	Emails to and from L Wolff regarding Order to Show Cause; email to D Foley and C Wange regarding Attorney's Fee Appeal; email from D Foley; review Stipulation for Dismissal of Remaining Claims in District Court Case	0.18 260.00/hr	45.50
12/19/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research on Hearing and on Frederic case	0.70 260.00/hr	182.00
	- WJS	Email from C Wang regarding Stipulation for District Court Case; email from R Haskin	0.05 260.00/hr	13.00
12/20/2018	- LJW	Preparation of Response to Lytle Reply to Order to Show Cause; Research 54(b) Certification	0.50 260.00/hr	130.00
12/21/2018	- LJW	Preparation of Response to Lytle's Reply to Order to Show Cause; emails to and from W Smith	0.30 260.00/hr	78.00
	- WJS	Review and revise Response to Lytle's Reply to Order to Show Cause; review docket in District Court Case; email to L Wolff	0.25 260.00/hr	65.00
12/27/2018	- LJW	Review Order and calendar Due Date	0.03 260.00/hr	6.50
	- WJS	Email from R Haskin; review proposed changes to Dismissal Stipulation; review Notice from Supreme Court regarding Briefing Schedule; calendar Deadlines; conference with D Martin regarding Pre-Trial Conference	0.08 260.00/hr	19.50
1/3/2019	- WJS	E-mails from opposing counsel; review Redlines to draft Stipulation	0.08 260.00/hr	19.50
1/7/2019	- DEM	E-mails from and to W Smith; telephone calls to and from W Smith; review file	0.13 260.00/hr	32.50
	- WJS	Review Notice of Hearing; emails to and from and telephone calls to and from D Martin regarding Pre-Trial Conference; emails to and from opposing counsel regarding Stipulation; review draft	0.08 260.00/hr	19.50
1/8/2019	- WJS	Prepare for Pretrial Conference; Meeting with D Foley regarding Stipulation; Appearance for Pre-Trial Conference in Department 9 (D Barker); conference with D Foley regarding Fees and Costs; telephone call from C Wang regarding Appeal Issues, Fees and Costs; conference with K Christensen	0.60 260.00/hr	156.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
1/15/2019	- LJW	Review Stipulation and Order; telephone call to W Smith regarding Brief	0.08 260.00/hr	19.50
	- WJS	Review Notices from Supreme Court and Opening Brief filed by Lytle's in Case No. 76198; telephone call to L Wolff regarding Issues on Appeal, substance of Lytle's Brief; and preparation of Response Brief	0.18 260.00/hr	45.50
1/16/2019	- LJW	Preparation of Reply to Appellant's Brief	1.03 260.00/hr	266.50
	- WJS	Review Notices from District Court; review Boulden & Lamothe Memo of Costs and Motion for Fees	0.15 260.00/hr	39.00
1/17/2019	- WJS	Review and notate Lytle's Opening Brief	0.30 260.00/hr	78.00
1/18/2019	- LJW	Review Court Pleadings	0.03 260.00/hr	6.50
1/19/2019	- LJW	Preparation of Statement of Facts for Reply to Appellate Brief	0.55 260.00/hr	143.00
1/21/2019	- LJW	Preparation of Points and Authorities regarding Law of Case Doctrine	1.00 260.00/hr	260.00
1/22/2019	- LJW	Preparation of Points and Authorities regarding Equitable Orders	0.53 260.00/hr	136.50
1/23/2019	- LJW	Preparation of Points and Authorities regarding Macintosh Caselaw	0.50 260.00/hr	130.00
	- WJS	Review Notice from Court; review Dismar's Motion for Fees and Costs; review Docket for Hearing Dates	0.10 260.00/hr	26.00
1/24/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes	0.48 260.00/hr	123.50
1/28/2019	- LJW	Preparation of Points and Authorities regarding Meaning of Statutes; Research "Plain Meaning Cases"	0.28 260.00/hr	71.50
	- WJS	Review Notice from Supreme Court regarding Order Consolidating Appeals; email to L Wolff regarding Response; calendar new Deadlines	0.08 260.00/hr	19.50
1/29/2019	- LJW	Review Court Notice regarding Consolidation; calendar new Due Dates	0.05 260.00/hr	13.00
	- WJS	Review Notice from District Court; review Lytle's Opposition to Boulden/Lamothe Motion for Fees and Costs	0.10 260.00/hr	26.00

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			Hrs/Rate	Amount
1/30/2019	- LJW	Review NRED 3 Litigation; review Opposition to Motion for Fees; preparation of Points and Authorities regarding "Plain Meaning" of Statutes	0.30 260.00/hr	78.00
2/1/2019	- LJW	Preparation of Points and Authorities on Plain Meaning of Statute	0.18 260.00/hr	45.50
2/4/2019	- LJW	Preparation of Points and Authorities on Statute; review Opposition to Motion to Retax Costs	0.18 260.00/hr	45.50
	- WJS	Review Notice from District Court; review Lamothe/Boulder Opposition to Motion to Retax Costs	0.05 260.00/hr	13.00
2/5/2019	- LJW	Preparation of Points and Authorities on Application of NRS 116.3117	0.33 260.00/hr	84.50
2/7/2019	- LJW	Research NRS 116.3117 and Judgment Liens	0.58 260.00/hr	149.50
2/8/2019	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.13 260.00/hr	32.50
2/11/2019	- WJS	E-mail from R Haskin regarding Order on Motion to Reconsider, Analysis and Order Issues	0.08 260.00/hr	19.50
	- LJW	Preparation of Points and Authorities regarding Application of NRS 116.3117	0.50 260.00/hr	130.00
2/12/2019	- ELJ	Conference with W Smith regarding Mootness of Order and Appeal Issues	0.08 260.00/hr	19.50
	- WJS	Conference with E James regarding Haskin's request; Research; emails to and from R Haskin regarding Motion to Reconsider and Extension Request; Notice from District Court and review Lytle Opposition to Disman Fee Motion; review Notice from Supreme Court and review Lytle Motion for Extension of Time to File Brief in Fees Case; emails to and from L Wolff regarding Extension Request	0.40 260.00/hr	104.00
	- LJW	Preparation of Summary of Facts on Answering Brief; Research Extension of Time to Answer Attorney's Argument Brief; email to W Smith; review Motion by Lytle regarding Extension of Time	0.55 260.00/hr	143.00
2/13/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief; review Court Order regarding Extension of Time	0.20 260.00/hr	52.00
	- WJS	Review Notice and Order from Supreme Court Granting Extension; calendar new Deadlines	0.05 260.00/hr	13.00
2/14/2019	- LJW	Preparation of Objections to Summary of Facts in Answering Brief	0.45 260.00/hr	117.00
2/18/2019	- LJW	Review Reply to Opposition	0.08 260.00/hr	19.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.25 260.00/hr	65.00
	- WJS Review Notices from District Court; review Minute Order	0.03 260.00/hr	6.50
2/21/2019	- LJW Preparation of Statement of Facts for Appellate Response	0.45 260.00/hr	117.00
2/27/2019	- WJS Review Notice from District Court regarding Hearing on Motion for Fees and Costs; review Docket	0.08 260.00/hr	20.80
3/13/2019	- WJS Review Notice from Supreme Court and Motion to Extend; conference with L Wolff; draft and file Response to Motion to Extend	0.35 260.00/hr	91.00
3/14/2019	- WJS Review Notices from Supreme Court; Research Dockets and Court calendar regarding District Court scheduled Hearings; emails to and from D Foley and C Wang regarding Hearing on Fees Motion	0.13 260.00/hr	32.50
	- LJW Review Motion to Extend Time; emails to and from W Smith; telephone call to W Smith regarding Motion	0.20 260.00/hr	52.00
3/15/2019	- LJW Review Reply to Opposition; emails to and from W Smith	0.08 260.00/hr	19.50
	- WJS Review from Supreme Court; review Reply filed by R Haskin; emails to and from L Wolff	0.08 260.00/hr	19.50
3/19/2019	- LJW Review Notice from Court	0.03 260.00/hr	6.50
4/10/2019	- WJS Preparation for and Appearance at Hearing of Fees and Costs Motions filed by other Plaintiffs; review Notice from Court regarding new Hearing Date before Judge Williams; emails to and from opposing counsel	0.35 260.00/hr	91.00
4/22/2019	- LJW Review filings regarding Extensions of Time; emails to and from W Smith; calendar Due Dates	0.08 260.00/hr	19.50
	- WJS Review Notice from District Court regarding Order on Stipulation to Continue Hearing; review Notice from Supreme Court regarding Lytle's 3rd Motion to Extend Briefing Schedule; emails to and from L Wolff; draft and file Opposition to Motion to Continue	0.20 260.00/hr	52.00
4/23/2019	- LJW Review Motion and Opposition	0.03 260.00/hr	6.50
4/26/2019	- LJW Review Reply to Opposition	0.03 260.00/hr	6.50
	- KBC Conference with W Smith regarding Extension Motion and Opposition; calendar Hearing	0.05 260.00/hr	13.00

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			Hrs/Rate	Amount
4/26/2019	- WJS	Review Notice from Supreme Court regarding Lytle Reply Brief; email from D Foley regarding Issues for Hearing; conference with K Christensen regarding status of Case and Briefing Schedule	0.15 260.00/hr	39.00
5/2/2019	- LJW	Review Court Order regarding Extension; emails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Review Notice from Supreme Court; review Order Denying Lytle Motion for Extension of Briefing Deadlines; emails to and from L Wolff; email to D Foley and C Wang	0.05 260.00/hr	13.00
5/7/2019	- WJS	Review Notice from District Court; review Motion to Set Hearing filed by Lytles	0.08 260.00/hr	19.50
5/15/2019	- WJS	Review emails from R Haskin; emails to and from and telephone call from D Foley regarding Hearing; review Court Pleadings and papers and preparation for Hearing	0.15 260.00/hr	39.00
5/16/2019	- WJS	Prepare for and attend Hearing at RJC (Judge Williams) on Motions for Fees and Costs (other Plaintiffs); case notes; Notices from Supreme Court regarding Lytle Opening Brief on Fees Appeal; emails to and from L Wolff	0.88 260.00/hr	227.50
	- LJW	Review Opening Brief and Appendices	0.15 260.00/hr	39.00
5/17/2019	- WJS	Review Notice from District Court and Minute Order Granting Fee Motions	0.05 260.00/hr	13.00
5/20/2019	- LJW	Review Court Order	0.03 260.00/hr	6.50
	- WJS	Review and annotate Lytle Opening Brief on Fees	0.38 260.00/hr	97.50
5/21/2019	- LJW	Telephone call to W Smith regarding Answering Brief; email to Court Clerk regarding Transcript; preparation of Answering Brief	0.38 260.00/hr	97.50
5/22/2019	- LJW	E-mails to and from Court Clerk	0.03 260.00/hr	6.50
5/28/2019	- KBC	Review Judgment Renewal Notice; emails to and from Attorney	0.05 260.00/hr	13.00
6/3/2019	- LJW	Preparation of Reply Brief; Research Standard of Review for Attorney's Fees and Costs on Appeal	0.70 260.00/hr	182.00
6/4/2019	- LJW	Research Law of the Case	0.40 260.00/hr	104.00
6/5/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	1.00 260.00/hr	260.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2019	- LJW	Research Law of the Case in the District of Nevada and the 9th Circuit; preparation of Appellate Reply Brief regarding Law of the Case	0.88 260.00/hr	227.50
6/7/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees	1.75 260.00/hr	455.00
6/10/2019	- LJW	Preparation of Reply Brief; preparation of Reply Statement of Facts; preparation of Section regarding Reasonableness of Attorney's Fees; telephone call to W Smith regarding Facts Section	1.25 260.00/hr	325.00
	- WJS	Telephone call from L Wolff regarding Arguments for Appeal Brief	0.15 260.00/hr	39.00
6/11/2019	- LJW	Preparation of Reply Brief; review and revise Citations to Law and Record; review Transcript and add to Brief; preparation of Exhibits for Appendix; revise Citations to Appendix	1.75 260.00/hr	455.00
6/12/2019	- LJW	Preparation of Reply Brief; preparation of Fact Section; preparation of Appendix	1.05 260.00/hr	273.00
	- WJS	Review and Redline draft Reply Brief; draft Answering Brief on Consolidated Appeals, Research	1.93 260.00/hr	500.50
6/13/2019	- LJW	Preparation of Appendix; Citations to Record; emails to and from W Smith	0.70 260.00/hr	182.00
	- WJS	Research and draft Answering Brief; review Documents for Respondents' Appendix, preparation of Appendix	1.63 260.00/hr	422.50
6/14/2019	- WJS	Preparation of Respondents' Appendix; review and revise Answering Brief	0.45 260.00/hr	117.00
	- LJW	Preparation of Appendix; revisions to Citations to Record; emails to and from W Smith; review Appellate Rules regarding Appendices and Documents	0.70 260.00/hr	182.00
6/17/2019	- WJS	Preparation of Table of Contents; review and revise Answering Brief; prepare Certifications; sign and prepare Brief and Appendix for filing	1.65 260.00/hr	429.00
6/18/2019	- WJS	Review Notice from Court; emails to and from L Wolff; review Notice form Court	0.05 260.00/hr	13.00
6/19/2019	- WJS	Review Order, make adjustments to Brief and prepare for filing; conference with Clerk regarding filing; review Court Notices regarding Acceptance of Filing	0.15 260.00/hr	39.00
	- LJW	Review Appellate Motion	0.05 260.00/hr	13.00
7/15/2019	- WJS	Emails to and from R Haskin; review Agreement and Appellant filings	0.10 260.00/hr	26.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2019	- WJS	Email from R Haskin; review draft Extension Stipulation; review Notices from Supreme Court	0.03 260.00/hr	6.50
8/5/2019	- WJS	Emails to and from R Haskin; review and approve Stipulation	0.03 260.00/hr	6.50
8/19/2019	- WJS	Review Notice from Supreme Court; review Motion and Lytle Reply Brief; email to L Wolff	0.15 260.00/hr	39.00
8/20/2019	- LJW	Review Motions and Research Brief and Opposition	0.28 260.00/hr	71.50
8/21/2019	- WJS	Emails to and from L Wolff regarding Response to Lytle Reply Brief	0.05 260.00/hr	13.00
	- LJW	Review Motions and Research Brief and Opposition; emails to and from W Smith	0.58 260.00/hr	149.50
8/22/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.65 260.00/hr	169.00
8/23/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit	0.55 260.00/hr	143.00
8/26/2019	- LJW	Preparation of Motion and Countermotion to Reply Brief and Motion to Expand Page Limit; emails to and from W Smith	0.60 260.00/hr	156.00
	- WJS	Review and revise Opposition and Countermotion; review Notice from Court	0.10 260.00/hr	26.00
8/27/2019	- LJW	Review and download Court Order	0.03 260.00/hr	6.50
9/3/2019	- LJW	Review and download Pleading	0.03 260.00/hr	6.50
9/4/2019	- WJS	Review Supreme Court filings from Lytles; emails to and from Counsel for Dismar regarding Stay of Execution and Fees Order	0.08 260.00/hr	19.50
9/30/2019	- WJS	Review Notice from Court regarding Appeal of Attorneys Fee Order; review Supreme Court Docket regarding Appeal	0.08 260.00/hr	19.50
10/1/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
10/4/2019	- LJW	Review Notice of Appeal	0.03 260.00/hr	6.50
	- WJS	Review Notice from Court regarding Appeal of Boulden/Lamothe Fee Order	0.03 260.00/hr	6.50
10/22/2019	- WJS	Review Notice from District Court regarding Stipulation to Stay Execution, Posting on Bond; review Notice from Supreme court regarding Association of Counsel for Lytle	0.08 260.00/hr	19.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/26/2019	- WJS	Review Notices from Court regarding Appearance for Lytle and request for Transcripts	0.03 260.00/hr	6.50
12/4/2019	- KBC	Conference with W Smith regarding Hearing and Order Appointing HOA Receiver	0.06 260.00/hr	16.25
	- WJS	Telephone call from K Christensen regarding Appointment of Receiver over Association; review Case History and Minutes of Proceedings; email to K Christensen and email to Clerk	0.20 260.00/hr	52.00
1/13/2020	- LJW	Review Court order regarding Lamothe	0.03 260.00/hr	6.50
1/21/2020	- WJS	Review Order from Supreme Court; Research; draft Response	0.35 260.00/hr	91.00
1/24/2020	- WJS	Conference with K Christensen and K Kearl regarding Receiver; review Case file; email to K Christensen with documents; conference with K Christensen	0.30 260.00/hr	78.00
	- KBC	Review Orders; Research; telephone call from Client regarding HOA Judgment and Receiver correspondence; conference with Client and W Smith; review CCRs, Receiver Documents and preparation for conference with Client	0.48 260.00/hr	123.50
1/27/2020	- WJS	Research; conference with K Christensen; preparation for conference with Clients; telephone call from C Wang; conference with Clients; draft letter to Receiver; email to L Wolff	0.75 260.00/hr	195.00
	- KBC	Review Receiver letter and Orders; review Injunction; Research; conference with W Smith regarding Contempt, Fees, Motion to Vacate and Sanctions; conference with Clients regarding Demand and Motions	0.63 260.00/hr	162.50
1/28/2020	- DEM	Conference with W Smith; review letter to Receiver	0.18 260.00/hr	45.50
	- WJS	Emails to and from L Wolff; draft letter to Receiver; Research; conference with D Martin regarding revisions; preparation of Exhibits; email to K Christensen; conference with K Christensen	0.60 260.00/hr	156.00
	- KBC	Review letter to Receiver and Attorney; email to Attorney; conference with W Smith	0.06 260.00/hr	16.25
	- LJW	Review letter to Client and Court filings; email to W Smith	0.13 260.00/hr	32.50
1/29/2020	- LJW	E-mails to and from W Smith	0.05 260.00/hr	13.00
	- WJS	Emails to and from D Foley regarding letter from Receiver; revise letter to Receiver; email from J Gegen; email to Clients	0.13 260.00/hr	32.50

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			Hrs/Rate	Amount
2/3/2020	- LJW	E-mails to and from W Smith; preparation of Motion for Order to Show Cause	0.50 260.00/hr	130.00
	- WJS	Review follow-up letter from Receiver; conference with K Christensen; email to L Wolff regarding drafting Motion	0.05 260.00/hr	13.00
	- KBC	Review letter from Receiver canceling Meeting; conference with W Smith; conference with Client	0.06 260.00/hr	16.25
2/4/2020	- KBC	Conference with W Smith regarding Motion for OTSC and Contempt; emails to and from Attorney regarding Motion; review Hearing Notice	0.06 260.00/hr	16.25
	- WJS	Review notification from Court; review Motion to Reduce to Judgment from old Case; conference with K Christensen; Research Dockets; conference with L Wolff regarding Motion	0.28 260.00/hr	71.50
	- LJW	Telephone call with W Smith; preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.90 260.00/hr	234.00
2/5/2020	- WJS	E-mail from J Gegen; review letters	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.38 260.00/hr	97.50
2/6/2020	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.28 260.00/hr	71.50
2/10/2020	- WJS	E-mails to and from D Foley; review Renewed Motion to Appoint Receiver; messages to and from L Wolff; Research	0.40 260.00/hr	104.00
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	0.53 260.00/hr	136.50
2/11/2020	- KBC	Calendar Hearing; conference with W Smith; review Motion	0.03 260.00/hr	6.50
	- WJS	Messages to and from L Wolff regarding Receiver Report	0.03 260.00/hr	6.50
	- LJW	Preparation of Motion for Order to Show Cause; Research Order to Show Cause	1.00 260.00/hr	260.00
2/12/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegan; preparation of Affidavit for W Smith	1.93 260.00/hr	500.50
2/13/2020	- LJW	Preparation of Motion for Order to Show Cause; preparation of Exhibits for Motion for Order to Show Cause; preparation of Affidavits for Kearl, Zobrist and Gegan; preparation of Affidavit for W Smith	1.08 260.00/hr	279.50

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2020	- WJS E-mail from L Wolff; review and revise Motion for Order to Show Cause	0.25 260.00/hr	65.00
	- LJW Preparation of Motion to Intervene	1.03 260.00/hr	266.50
2/18/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.63 260.00/hr	162.50
2/19/2020	- LJW Preparation of Motion to Intervene; preparation of Affidavits	0.80 260.00/hr	208.00
2/20/2020	- LJW Preparation of Motion to Strike Order	0.80 260.00/hr	208.00
2/21/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	0.80 260.00/hr	208.00
	- LJW Preparation of Motion to Intervene	0.55 260.00/hr	143.00
2/22/2020	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/24/2020	- WJS Drafting and revisions to Motion for Order to Show Cause	1.05 260.00/hr	273.00
	- LJW Preparation of Motion to Intervene	0.73 260.00/hr	188.50
2/25/2020	- WJS Drafting and revisions to Motion for Order to Show Cause; Research; email to L Wolff	1.30 260.00/hr	338.00
	- LJW Preparation of Motion to Intervene	0.45 260.00/hr	117.00
2/26/2020	- WJS E-mails to and from L Wolff	0.03 260.00/hr	6.50
	- LJW Preparation of Motion to Intervene	0.53 260.00/hr	136.50
3/2/2020	- WJS Review and revise Motion to Intervene; Research; review Notice from Nevada Supreme Court; review Order Submitting for Decision; draft Affidavits; review Notice from NSC; review Order of Affirmance; conference with K Christensen; revisions to Motion for Order to Show Cause and Motion to Intervene	1.50 260.00/hr	390.00
3/3/2020	- WJS E-mails to and from L Wolff; review and revise Motions and Affidavits; emails to Client regarding Affidavits; preparation of Exhibits; meet with Zobrist and Kearl; telephone call from L Wolff	0.70 260.00/hr	182.00
	- LJW Review Affirmance Order from Supreme Court; telephone call to W Smith	0.10 260.00/hr	26.00

September Trust, dated March 23, 1972

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2020	- WJS	0.65 260.00/hr	169.00
			Emails to and from D Foley and C Wang; Research Court Rules; draft Bill of Costs on Appeal; Research Supersedeas Bond; notes to file; meet with Julie Gegen regarding Affidavits; revisions to Motions; prepare Motions and Exhibits for filing
3/5/2020	- WJS	0.18 260.00/hr	45.50
			Review Notices from Court regarding Hearings, calendar and send emails to Counsel; draft Bill of Costs; finalize and prepare for filing; review Notices from Supreme Court
3/6/2020	- KBC	0.09 260.00/hr	22.75
			Conference with W Smith regarding proposed Motion and Hearing Stipulation and Issues; review email from new opposing counsel
	- WJS	0.20 260.00/hr	52.00
			Review Notice; review Joinders filed by C Wang and D Foley; email to Clients; email from D Waite regarding Stipulation to Intervene; conference with K Christensen
3/9/2020	- WJS	0.60 260.00/hr	156.00
			Research Intervention Rules; telephone call from D Waite regarding Stipulation to Intervene; telephone call from C Wang; telephone call from R Disman; email from D Waite and review and redline draft Stipulation; review Court Notices
	- LJW	0.03 260.00/hr	6.50
			Review Pleadings; email to W Smith
3/10/2020	- KBC	0.10 260.00/hr	26.00
			Conference with W Smith regarding requested Stipulation to Intervene, OTSC, Attorney's Fees and Receiver Issues; review Attorney emails
	- WJS	0.35 260.00/hr	91.00
			E-mails from D Waite regarding Settlement Offer and Stipulation on Motion to Intervene; conference with K Christensen; draft revisions to Stipulation; emails to and from L Wolff; emails to and from D Waite; telephone call from D Foley; conference with Clerk regarding Fees Statements
	- LJW	0.05 260.00/hr	13.00
			Review revised Stipulation and Order; emails to and from W Smith
3/11/2020	- WJS	0.40 260.00/hr	104.00
			E-mails from D Waite; review and analysis of Stipulation redline; preparation for Status Hearing in Receiver Action; check Docket; email to Counsel for Receiver
	- LJW	0.78 260.00/hr	201.50
			Preparation of Motion to Set Aside Order
3/12/2020	- KBC	0.08 260.00/hr	19.50
			Conference with W Smith; preparation of Motion to Vacate Order; review D Waitz letter to Receiver
	- ELJ	0.65 260.00/hr	169.00
			Meeting with W Smith regarding opposing Arguments (.7); Research Caselaw on Unclean Hands and Fraud on Court; email to W Smith and L Wolff with Caselaw and Arguments
	- WJS	1.20 260.00/hr	312.00
			Preparation for Hearing; Appearance at Status Hearing in Receivership Case; telephone call to L Wolff regarding Motion; email from Receiver's Counsel, review January Status Report; letter from D Waite - analysis; conference with Clerk regarding

September Trust, dated March 23, 1972

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Research; conference with E James and analysis of Lytle Trust Arguments from D Waite; review Cases; emails to and from L Wolff; conference with K Christensen		
3/12/2020	- LJW	Preparation of Motion to Set Aside Order; Research Association Powers	1.13 260.00/hr	292.50
	- DL	Research HOA Issue; email to W Smith	0.55 125.00/hr	68.75
3/13/2020	- WJS	E-mails to and from L Wolff; emails to and from Clerk; review Research notes	0.08 260.00/hr	19.50
	- LJW	Preparation of Motion to Set Aside Order; Research exceeding Authority of CC&Rs and Statutes; emails to and from W Smith	1.13 260.00/hr	292.50
	- DL	Research HOA Issues; email to W Smith	0.65 125.00/hr	81.25
3/16/2020	- WJS	Review Notice from Court; review Motion for Instruction filed by Receiver; emails to and from L Wolff; draft Opposition/Counter-motion	0.48 260.00/hr	123.50
3/17/2020	- WJS	Draft Opposition/Motion for Receivership Case	0.85 260.00/hr	221.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	0.15 260.00/hr	39.00
3/18/2020	- LJW	Preparation of Opposition to Motion for Receiver Order	0.30 260.00/hr	78.00
3/19/2020	- WJS	Draft Opposition to Motion for Instruction in Receiver Case; emails to and from L Wolff	1.20 260.00/hr	312.00
	- LJW	Preparation of Opposition to Motion for Receiver Order	1.03 260.00/hr	266.50
3/20/2020	- WJS	E-mails to and from L Wolff regarding Arguments for Motion	0.05 260.00/hr	13.00
	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.25 260.00/hr	325.00
3/23/2020	- LJW	Preparation of Opposition to Motion for Receiver Order; email to W Smith; Research CC&Rs; implied powers for LPA's	1.50 260.00/hr	390.00
	- WJS	Review redline of Motion to Rescind Receiver Order; draft and revise Motion; Research for Motion	0.68 260.00/hr	175.50
3/24/2020	- LJW	Preparation of Reply to Opposition to Order to Show Cause	0.50 260.00/hr	130.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2020	- WJS Research, draft and revise Motion to Rescind Receiver Order; email to L Wolff	2.15 260.00/hr	559.00
3/25/2020	- WJS Emails to and from L Wolff; review and revise Declaration for Opposition and Countermotion; revisions of Opposition and Countermotion and prepare for filing	0.30 260.00/hr	78.00
	- LJW Revisions to Opposition to Receivership Motion; preparation of Exhibits and Declarations	0.80 260.00/hr	208.00
3/26/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause	0.63 260.00/hr	162.50
3/27/2020	- WJS Conference with L Wolff regarding Reply in Motion OSC	0.08 260.00/hr	19.50
	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.48 260.00/hr	123.50
3/30/2020	- LJW Preparation of Reply to Opposition to Order to Show Cause; telephone call to W Smith regarding Arguments	0.70 260.00/hr	182.00
3/31/2020	- LJW Preparation of Reply to Order to Show Cause; Research Receiver and Contempt Orders	1.23 260.00/hr	318.50
4/2/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.45 260.00/hr	117.00
	- WJS Review draft Reply on Motion for Order to Show Cause; telephone calls to and from D Foley regarding Boulden and Lamothe	0.15 260.00/hr	39.00
4/3/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.58 260.00/hr	149.50
4/6/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.53 260.00/hr	136.50
4/7/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; email to Clerk	0.55 260.00/hr	143.00
	- WJS Review Notice from Receiver Court regarding Hearing Date and Telephonic Appearance; emails to and from L Wolff; emails to and from D Waite and P Lee; analysis of timing of Hearings between Cases	0.05 260.00/hr	13.00
4/8/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause	0.75 260.00/hr	195.00
4/9/2020	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.85 260.00/hr	221.00
	- WJS Review Notices from Court; emails to and from L Wolff regarding Reply and preparing for Hearing	0.05 260.00/hr	13.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2020	- WJS Telephone calls to and from L Wolff regarding substance of Oppositions; draft Reply Brief; emails to and from D Waite and P Lee regarding Hearing Date for Receiver Case; emails to and from and telephone calls to and from L Wolff regarding Motion to Move Hearing; review and revise draft Motion and Declaration; prepare for filing; review Notices from Court; review Opposition from Lytle; email to L Wolff	0.28 260.00/hr	71.50
	- LJW Preparation of Reply to Opposition to Motion for Order to Show Cause; emails to and from W Smith; preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Motion regarding Hearing Date; preparation of Stipulation and Order to reschedule Hearing Date	1.48 260.00/hr	383.50
4/11/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion	0.38 260.00/hr	97.50
4/13/2020	- WJS Preparation for Oral Argument in Receiver Case; prepare Argument outline, Research; review Court Notices; emails to and from L Wolff regarding Appearances; review Lytle Trust's Opposition in the Receiver Case; conference with L Wolff regarding Reply Briefs; review and redline Reply Brief for Motion for Order to Show Cause; emails to and from D Foley	2.38 260.00/hr	617.50
	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; telephone call to W Smith; telephone call to Court; telephone call to CourtCall	1.75 260.00/hr	455.00
4/14/2020	- LJW Preparation of Reply to Lytle Trust Countermotion to Receiver Motion; preparation of Reply to Receiver's Countermotion; emails to and from W Smith; preparation of Exhibits; preparation of Declarations; telephone call to Clerk	1.85 260.00/hr	481.00
	- WJS Revise and draft (3) Reply Briefs, Supporting Declaration and Research in support; emails to and from L Wolff	1.25 260.00/hr	325.00
4/15/2020	- WJS E-mails to and from Counsel for Lytle Trust and Receiver; emails to and from L Wolff; preparation for Hearing in Receiver Case; participate in Telephone Hearing in Receiver Case; participate in Telephone Hearing with Judge Kishner in Receiver Case, argue Motions; debrief with K Christensen and L Wolff	1.20 260.00/hr	312.00
	- LJW Review filings and emails; email to W Smith	0.05 260.00/hr	13.00
4/16/2020	- DEM Research recent Nevada HOA Caselaw; email to W Smith	0.25 260.00/hr	65.00
4/17/2020	- WJS E-mail from D Martin and review new Supreme Court Opinion	0.10 260.00/hr	26.00
4/20/2020	- LJW Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond	0.30 260.00/hr	78.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2020	- WJS Review NRAP regarding Remittitur and Bill of Costs; emails to and from L Wolff regarding Fees and Costs on Appeal	0.10 260.00/hr	26.00
4/21/2020	- WJS Emails to and from L Wolff regarding Remittitur and Fees Motion strategy (.3); Notices from Court; review Hearing Exhibits filed by Lytle Trust (.3); emails to and from P Lee, Counsel for Receiver regarding participation in Hearing, letter to Court and follow up emails (.2); prepare for Hearing on Motion for Order to Show Cause; review Motion, Opposition, and Reply (1.4); draft oral Argument Statement and notes (1.1); emails to and from L Wolff; revisions to oral Argument Statement and notes; telephone call from L Wolff (1.2); telephone call to C Wang (1.1); telephone calls to and from D Foley (.2), oral Argument practice; adjustments to statement, notes (.7)	1.63 260.00/hr	422.50
	- LJW Preparation of Motion for Attorney's Fees; preparation of Motion to Exonerate Bond; review outline of Hearing; telephone call to W Smith regarding Hearing	1.05 260.00/hr	273.00
4/22/2020	- KBC Conference with Attorney regarding Court Order and Sanctions	0.06 260.00/hr	16.25
	- WJS Prepare for Hearing; attend telephonic Hearing before Judge Williams on Motion for Order to Show Cause and present Argument on Motion; file notes regarding Judge's Decision (granted Motion) for preparing Order; emails to and from C Wang and D Foley; telephone call to L Wolff; telephone call to K Christensen; review Docket for Minutes	1.30 260.00/hr	338.00
	- LJW Preparation of Motion for Attorney's Fees; telephone call to W Smith regarding Hearing	0.18 260.00/hr	45.50
4/23/2020	- LJW Preparation of Motion for Attorney's Fees; emails to and from W Smith; review Notice	0.13 260.00/hr	32.50
	- WJS Review analysis of notes and structure of Proposed Order; review Notice from Receiver Court; review Notice of Decision filed by Lytle Trust; emails to and from D Foley and L Wolff; review prior Orders; review Motion and notes from oral Argument; draft Order Granting Motion for Order to Show Cause; emails to and from L Wolff	1.08 260.00/hr	279.50
4/24/2020	- WJS Review and revise Order Granting Motion for Order to Show Cause; emails to and from L Wolff; emails to and from D Foley and C Wang	0.43 260.00/hr	110.50
	- LJW Review and revise Order on Motion to Show Cause; contact Court Clerk regarding Transcript; preparation of Motion to Release Bond	0.95 260.00/hr	247.00
4/27/2020	- WJS E-mail from D Foley; review Redline and incorporate changes; email from C Wang; review Redline and incorporate changes; revisions to draft Order; email to R Haskins and D Waite	0.40 260.00/hr	104.00
4/28/2020	- LJW Review emails and revised Order	0.05 260.00/hr	13.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2020	- LJW	Preparation of Motion for Fees and Costs	0.25 260.00/hr	65.00
For professional services rendered			144.28	\$37,350.80
Additional Charges :				
			<u>Qty/Price</u>	
5/24/2018	- N	District Court Filing Fee - Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/25/2018	- LJW	District Court Filing Fee - Notice of Entry of Order Granting Motion for Summary Judgment	0.25 3.50	0.88
5/31/2018	- N	WestLaw Research 5/1-5/31/2018	0.25 200.54	50.14
6/4/2018	- N	District Court Filing Fee - Motion for Attorneys Fees and Costs, Memorandum and Declaration	0.25 3.50	0.88
6/6/2018	- N	District Court Filing Fee - Notice of Hearing on Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
6/11/2018	- N	Clark County District Court Document Downloads - 1. Defendant's Motion Regarding-Tax Costs (\$8.50); 2. Defendants' Reply in Support of Motion to Regarding-Tax Costs (\$9.50); 3. Defendants Motion Regarding-Tax Costs (7.5); 4. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Opposition to Motion Regarding-Tax Costs (\$6.50); 5. Plaintiffs John Allen Lytle and Trudi Lee Lytle's Memorandum of Costs (\$4.00)	0.25 36.00	9.00
6/15/2018	- N	District Court Filing Fee - Plaintiffs' Opposition to Defendants' Motion to Retax and Settle Memorandum of Costs and Declaration	0.25 3.50	0.88
6/22/2018	- N	Clark County District Court Download Fee - Releases (4 - filed June 13, 2018) Case No. A-16-747800-C	0.25 8.00	2.00
6/30/2018	- N	WestLaw Research 6/1-6/30/18	0.25 121.91	30.48
7/5/2018	- N	District Court Filing Fee - (1.) Reply and (2.) Declaration	0.25 3.50	0.88
7/26/2018	- N	Court Parking Expense - Motion for Fees and Costs	0.25 6.00	1.50
7/31/2018	- N	WestLaw Research 7/1-7/31/18	0.25 149.96	37.49
8/7/2018	- N	Clark County District Court Download Fee	0.25 2.00	0.50

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		<u>Qty/Price</u>	<u>Amount</u>
8/31/2018 - N	WestLaw Research 8/1-8/31/18	0.25 32.85	8.21
9/12/2018 - N	Clark County District Court - Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/13/2018 - N	Clark County District Court - Notice of Entry of Order Regarding Plaintiffs' Motion for Attorney's Fees and Costs	0.25 3.50	0.88
9/24/2018 - N	Clark County District Court - Certified Copy Fee (Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs)	0.25 5.00	1.25
- N	Recordation Fee - Order Regarding Plaintiffs' Motion for Attorneys Fees and Costs	0.25 50.00	12.50
9/30/2018 - N	WestLaw Research 9/1-9/30/18	0.25 37.06	9.27
10/1/2018 - N	District Court Filing Fee - Plaintiff's Response to Defendants' Motion to Stay	0.25 3.50	0.88
10/31/2018 - N	WestLaw Research 10/1-10/31/18	0.25 100.93	25.23
11/21/2018 - N	District Court Filing Fee - Opposition to Defendants' Motion to Reconsider	0.25 3.50	0.88
11/30/2018 - N	WestLaw Research 11/1-11/30/18	0.25 57.79	14.45
12/18/2018 - N	Clark County District Court Document Download Fee - Transcript of Hearing on Motion to Reconsider	0.25 12.50	3.13
12/31/2018 - N	WestLaw Research 12/1-12/31/18)	0.25 189.35	47.34
1/31/2019 - N	WestLaw Research (1/1-1/31/19)	0.25 37.27	9.32
2/28/2019 - N	WestLaw Research February 2019	0.25 119.41	29.85
6/10/2019 - N	Reporter's Transcript Fee on Appeal	0.25 443.54	110.89
6/30/2019 - N	WestLaw Research	0.25 301.54	75.39
8/31/2019 - N	WestLaw Research	0.25 138.53	34.63
1/31/2020 - N	WestLaw Research January 2020	0.25 31.81	7.95

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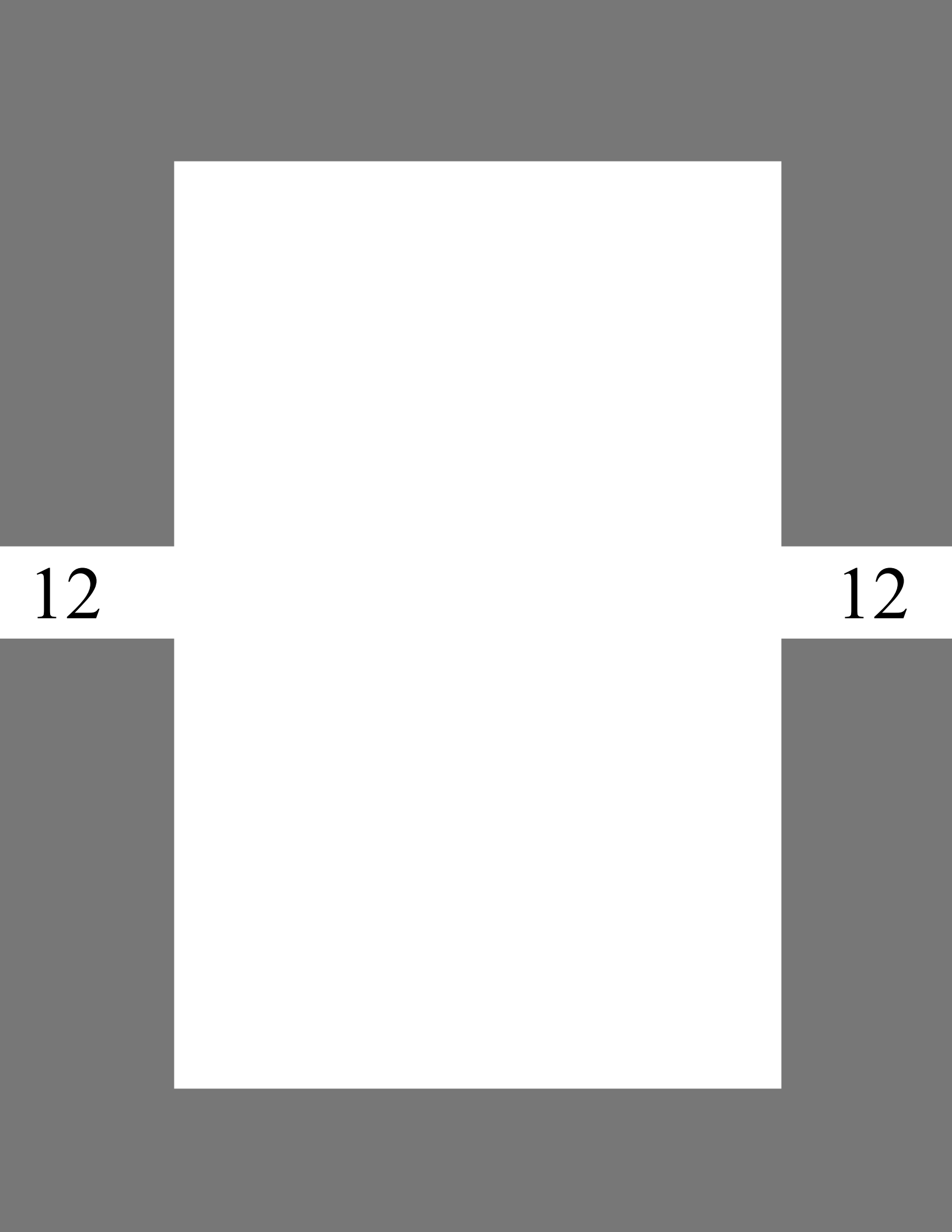
			<u>Qty/Price</u>	<u>Amount</u>
2/4/2020 - N	Clark County District Court Document Download - Order on Receivership		0.25 5.50	1.38
2/5/2020 - N	Clark County District Court Document Download - Renewed Application for Appointment of Receiver		0.25 101.97	25.49
2/11/2020 - N	Clark County District Court Document Download - Initial Report and Notice of Intent to Pay Receivers Fees and Expenses		0.25 19.00	4.75
2/29/2020 - N	WestLaw Research - February 2020		0.25 528.58	132.15
3/4/2020 - N	District Court Filing Fee - Plaintiffs' Motion for Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders		0.25 3.50	0.88
- N	District Court Filing Fee - Motion to Intervene and Initial Appearance Fee Disclosure		0.25 356.79	89.20
3/11/2020 - N	Court Parking Expense at Hearing		0.25 6.00	1.50
3/26/2020 - N	District Court Filing Fee - Opposition to Receiver's Motion for Instructions and Countermotion to Set Aside or Amend Receivership Order		0.25 3.50	0.88
3/31/2020 - N	WestLaw Research (March 2020)		0.25 683.39	170.85
4/10/2020 - N	District Court Filing Fee - Interveners' Motion to Move Hearing Date on Receiver's Motion for Instructions, or in the Alternative, Request to File a Reply Brief Within Five Days of Hearing (A-18-775843-C)		0.25 3.50	0.88
4/13/2020 - N	District Court Filing Fee - Notice to Appear (A-18-775843-C)		0.25 3.50	0.88
4/14/2020 - N	District Court Filing Fee - Reply to Opposition to Plaintiffs' Motion for an Order to Show Cause Why the Lytle Trust Should Not Be Held in Contempt for Violation of Court Orders (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Lytle Trust's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-16-747800-C)		0.25 3.50	0.88
- N	District Court Filing Fee - Interveners' Reply to Receiver's Opposition to Countermotion to Set Aside or Amend Receivership Order (A-18-775843-C)		0.25 3.50	0.88
4/15/2020 - N	CourtCall Appearance Fee - Hearing on Motion (A-18-775843-C)		0.25 51.00	12.75
4/30/2020 - N	WestLaw Research April 2020		0.25 250.87	62.72

September Trust, dated March 23, 1972

		<u>Amount</u>
Total costs		\$1,036.27
		<u>Amount</u>
For professional services rendered	<u>144.28</u>	\$38,387.07

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6/11/2020 4:10 PM

Steven D. Grierson

CLERK OF THE COURT

**MATF**

CHRISTINA H. WANG, ESQ.

Nevada Bar No. 9713

FIDELITY NATIONAL LAW GROUP

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*Attorneys for Counter-Defendants/Cross-Claimants**Robert Z. Disman and Yvonne A. Disman***DISTRICT COURT****CLARK COUNTY, NEVADA**

MARJORIE B. BOULDEN, TRUSTEE OF
THE MARJORIE B. BOULDEN TRUST,
LINDA LAMOTHE AND JACQUES
LAMOTHE, TRUSTEES OF THE JACQUES
& LINDA LAMOTHE LIVING TRUST,

Plaintiffs,

vs.

TRUDI LEE LYTLE, JOHN ALLEN LYTLE,
THE LYTLE TRUST, DOES I through X, and
ROE CORPORATIONS I through X,

Defendants.

Case No.: A-16-747800-C

Dept. No.: XVI

HEARING REQUESTED**ROBERT Z. DISMAN AND YVONNE
A. DISMAN'S MOTION FOR
ATTORNEY'S FEES**

AND ALL RELATED MATTERS

Counter-Defendants/Cross-Claimants ROBERT Z. DISMAN and YVONNE A.
DISMAN (collectively referred to herein as, the "Dismans"), by and through their attorneys of
record, the Fidelity National Law Group, hereby move this Honorable Court for an award of
attorney's fees against Defendants/Counter-Claimants TRUDI LEE LYTLE and JOHN ALLEN
LYTLE, TRUSTEES OF THE LYTLE TRUST (collectively referred to herein as, the "Lyttles").

///

///

1 This Motion is made and based upon the following Memorandum of Points and
2 Authorities, all pleadings, exhibits and documents on file with the Court in this action, such
3 further documentary evidence as the Court deems appropriate, and any arguments of counsel at
4 the hearing of this matter.

5 DATED this 11th day of June, 2020.

6 FIDELITY NATIONAL LAW GROUP

7
8 /s/ Christina H. Wang

9 CHRISTINA H. WANG, ESQ.

10 Nevada Bar No. 9713

11 8363 W. Sunset Road, Suite 120

12 Las Vegas, Nevada 89113

13 *Attorneys for Counter-Defendants/*

14 *Cross-Claimants Robert Z. Disman*

15 *and Yvonne A. Disman*

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

This case arises from the Lytles' wrongful attempt to enforce a judgment that they obtained against their property owners association against properties within their residential subdivision belonging to Marjorie B. Boulden, Trustee of The Marjorie B. Boulden Trust ("Boulden"), and Linda Lamothe and Jacques Lamothe, Trustees of The Jacques & Linda Lamothe Living Trust (collectively referred to herein as, "Lamothe"). *More than three years ago*, this Court enjoined the Lytles from doing so and from "taking any action in the future against" those property owners or their properties based upon the judgement. The Lytles appealed the Court's order to the Nevada Supreme Court, which is within their right.

However, rather than await the result of the appeal before taking further action, the Lytles expanded the scope of this case by seeking to enforce a *second* judgment that they obtained against their property owners association against the Boulden and Lamothe properties and adding the Dismans as parties to the case by virtue of their purchase of the Boulden property. Incredibly, the Lytles did so in spite of their later acknowledgement that their claim regarding the second judgment was "fully adjudicated" by this Court when it made its decision regarding the Lytles' first judgment. The Lytles' acknowledgement begs the question of why did they choose to proceed against the Dismans in the first place.

It gets worse. Unbeknownst to the Dismans and in direct violation of the Court's order, the Lytles took another route to enforce their judgments against the association against the property owners within the subdivision. The Lytles commenced an action on or about June 8, 2018, in another department of the district court through which they obtained the appointment of a receiver to issue and collect a special assessment from the property owners to satisfy the judgments. The Lytles maintained that action even though shortly after its commencement, the Nevada Supreme Court affirmed this Court's order. The Dismans first learned of the receiver action earlier this year when the receiver sent them correspondence asking for ideas on how they propose to pay the Lytles' judgments.

1 The Lytles' continued efforts to obtain payment of their judgments against the
2 association from the individual property owners by any means necessary has resulted in
3 substantial distress as well as additional attorney's fees to the Dismans. While the Court cannot
4 compensate the Dismans for the cumulative emotional toll of being embroiled in three years of
5 unnecessary litigation, it should award them every penny of attorney's fees expended in
6 connection with the Lytles' violation of the Court's order in the amount of \$7,920.00.

7 Attached hereto as **Exhibit A** are time sheets which detail the tasks performed by the
8 Dismans' attorney and the fees incurred. The time sheets are supported by the concurrently filed
9 affidavit of the Dismans' attorney, attached hereto as **Exhibit B**, which affirms that the fees
10 were actually and necessarily incurred and are reasonable. The Dismans note that they will
11 continue to incur fees in this matter and specifically request that they also be awarded their fees
12 for any additional briefing, hearing and proceedings. Such an award is necessary to deter,
13 hopefully, any further violation by the Lytles.

14 **II. FACTUAL AND PROCEDURAL BACKGROUND¹**

15 **A. The Rosemere Subdivision**

16 Rosemere Court ("Rosemere" or "subdivision") is a residential subdivision located in
17 Clark County, Nevada, comprised of nine (9) lots. *See* Decl. of Covenants, Conditions and
18 Restrictions, attached hereto as **Exhibit C**. On January 4, 1994, Baughman & Turner Pension
19 Trust, then owner and subdivider of Rosemere, recorded a Declaration of Covenants, Conditions
20 and Restrictions governing the subdivision ("Original CC&Rs"). *See id.* The Original CC&Rs
21 did not provide for the organization of a unit-owners' association as defined by NRS Chapter
22 116; rather, they called for the establishment of a "property owners committee" for the limited
23 purpose of maintaining specific elements of the subdivision. *See id.*

24 On July 3, 2007, an Amended and Restated Declaration of Covenants, Conditions, and
25 Restrictions for Rosemere ("Amended CC&Rs") was recorded, purportedly by the Rosemere
26 Estates Property Owners Association ("Rosemere Association" or "Association"). The

27 ¹ The following factual and procedural background omits, for the most part, related exhibits in order to reduce the
28 volume of this submission. It includes only those exhibits that directly bear on the issues at hand.

Amended CC&Rs set forth new requirements for the subdivision and provided that the changes were made in order to bring the same into compliance with the provisions of NRS Chapter 116.

B. The Rosemere Litigation I

On June 26, 2009, the Lytles, owners of the Rosemere property identified as APN: 163-03-313-009, filed a lawsuit in district court against the Rosemere Association seeking, among other things, a declaratory judgment that the Amended CC&Rs were not properly adopted and, therefore, void (Case No. A-09-593497-C) (at times referred to herein as, the “Rosemere Litigation I”). The Dismans were not parties to the Rosemere Litigation I.²

On or about July 30, 2013, the court granted summary judgment in the Lytles’ favor, and in an order prepared by the Lytles’ counsel, the court made the following legal determinations.

C. Rosemere Is A Limited Purpose Association Under NRS 116.1201 And Not A Unit-Owners’ Association Within The Meaning Of NRS, Chapter 116.

....

11. *Here, no Chapter 116 unit-owners’ association was formed* because no association was organized prior to the date the first unit was conveyed. The Association was not formed until February 25, 1997, more than three years after Rosemere Estates was formed and the Original CC&Rs were recorded.

....

13. The Original CC&Rs provide for the creation of a “property owners committee,” *which is a “limited purpose association,”* as defined by the 1994 version of NRS 116.1201, then in effect. That provision provided that Chapter 116 did not apply to “Associations created for the limited purpose of maintaining . . . “[t]he landscape of the common elements of a common interest community. . . .”

See Order Granting the Lytles’ Mot. for Summ. J., attached hereto as **Exhibit D**, at pp. 6-8 (emphasis added).

The court invalidated the Amended CC&Rs, specifically holding that no NRS Chapter 116 unit-owners’ association was formed with respect to the subdivision. *See id.* The court also awarded the Lytles a monetary judgment against the Association, consisting of attorney’s fees and costs and other damages in the total amount of \$361,238.59 plus post-judgment interest (the “Rosemere Judgment I”). *See* Abstract of J., attached hereto as **Exhibit E**.

² As set forth below, the Dismans did not acquire their Rosemere property until August 2017.

On August 18, 2016, and purportedly relying upon NRS 116.3117,³ the Lytles caused to be recorded an abstract of the Rosemere Judgment I against all of the properties within the subdivision, aside from their property. On September 2, 2016, they caused to be recorded an abstract of the judgment against the property identified as APN: 163-03-313-002. On the same day, they also caused to be recorded an abstract of the judgment against the property identified as APN: 163-03-313-008.

C. The Rosemere Litigation II

On December 13, 2010, the Lytles filed a second lawsuit in district court against the Rosemere Association alleging claims for declaratory relief, slander of title, and injunctive relief (Case No. A-10-631355-C) (at times referred to herein as, the “Rosemere Litigation II”). The Dismans were not parties to the Rosemere Litigation II.

The court ultimately granted summary judgment in the Lytles’ favor and awarded them a monetary judgment against the Association, consisting of attorney’s fees and costs and other damages, in the total amount of \$1,103,158.12 plus post-judgment interest (the “Rosemere Judgment II”). *See* Abstract of J., attached hereto as **Exhibit F**.

D. The Rosemere III Litigation

On or about April 2, 2015, the Lytles filed a third lawsuit in district court against the Rosemere Association, Sherman L. Kearl, and Gerry G. Zobrist, alleging a claim for declaratory relief (Case No. A-15-716420-C) (at times referred to herein as, the “Rosemere Litigation III”). The Dismans were not parties to the Rosemere Litigation III.

The court ultimately granted summary judgment in favor of the Lytles and awarded them attorney’s fees and costs in the total amount of \$15,462.60 (the “Rosemere Judgment III”). *See* Order Granting the Lytles’ Mot. for Attorneys’ Fees, attached hereto as **Exhibit G**.

³ NRS 116.3117 is entitled “Liens against association,” and provides in relevant part:

1. In a condominium or planned community: (a) Except as otherwise provided in paragraph (b), a judgment for money against the association, if a copy of the docket or an abstract or copy of the judgment is recorded, is not a lien on the common elements, but is a lien in favor of the judgment lienholder against all of the other real property of the association and all of the units in the common-interest community at the time the judgment was entered. No other property of a unit’s owner is subject to the claims of creditors of the association.

E. The Instant Action

On December 8, 2016, Boulden and Lamothe commenced the instant action against the Lytles alleging claims for slander of title, injunctive relief, quiet title, and declaratory relief with respect to the Lytles' recording of abstracts of the Rosemere Judgment I against their properties. At the time, Boulden was the owner of the property identified as APN: 163-03-313-008, commonly known as 1960 Rosemere Court, Las Vegas, Nevada 89117 ("1960 Rosemere Court"). Lamothe was the owner of the property identified as APN: 163-03-313-002, commonly known as 1830 Rosemere Court, Las Vegas, Nevada 89117 ("1830 Rosemere Court").

On February 24, 2017, Boulden and Lamothe moved for partial summary judgment on all of their claims for relief, with the issue of damages and attorney's fees to be determined at a separate evidentiary hearing. This Court granted summary judgment in their favor and entered the following legal conclusions:

CONCLUSIONS OF LAW

1. The Association is a "limited purpose association" as referenced in NRS 116.1201(2).

2. As a limited purpose association, NRS 116.3117 is not applicable to the Association.

3. As a result of the Rosemere [] Litigation [I], the Amended CC&Rs were judicially declared to have been improperly adopted and recorded, the Amended CC&Rs are invalid and have no force and effect and were declared void ab initio.

4. The Plaintiffs were not parties to the Rosemere [] Litigation [I].

....

7. The Final Judgment against the Association is not an obligation or debt owed by the Plaintiffs.

See Order Granting Mot. to Alter or Amend Findings of Fact and Conclusions of Law (at times referred to herein as, "July 2017 Order"), attached hereto as **Exhibit H**, at 4:12-23. The Court thus held that the Lytles improperly clouded title to Boulden and Lamothe's properties by recording abstracts of the Rosemere Judgment I against them; that those abstracts of judgment should be released; and that the Lytles are permanently enjoined from "recording and enforcing

1 the [] Judgment from the Rosemere [] Litigation [I] or any abstracts related thereto against the
2 Boulden Property or the Lamothe Property” and from “taking any action in the future against
3 [Boulden and Lamothe] or their properties based upon the Rosemere [] Litigation [I].” *See id.*
4 at pp. 5-7.

5 The Lytles appealed this Court’s order to the Nevada Supreme Court. And although they
6 released their abstracts of the Rosemere Judgment I against Boulden and Lamothe’s properties,
7 they advised them of the Rosemere Judgment II that they recently obtained. This prompted
8 Boulden and Lamothe to file an amended complaint against the Lytles that sought, *inter alia*, to
9 enjoin the Lytles from recording or enforcing the Rosemere Judgment II against Boulden and
10 Lamothe’s properties.

11 On or about August 4, 2017, Boulden sold 1960 Rosemere Court to the Dismans. On
12 August 11, 2017, the Lytles filed a Counterclaim against Lamothe and the Dismans seeking a
13 declaration that an abstract of the Rosemere Judgment II can be recorded against Lamothe and
14 the Dismans’ properties. *See* the Lytles’ Answer to Pls.’ Second Am. Compl. and Countercl.,
15 attached hereto as **Exhibit I**.

16 On or about June 28, 2018, the Dismans moved for summary judgment or judgment on
17 the pleadings against the Lytles on the basis that this Court’s July 2017 Order regarding the
18 Rosemere Judgment I rendered the Lytles’ Counterclaim regarding the Rosemere Judgment II
19 unsustainable. The Lytles opposed the motion, arguing as follows with respect to why the Court
20 should deny the judgment sought:

21 The Dismans lack any standing to bring the instant Motion for Summary
22 Judgment. There is but a single claim by and between the Lytles and the
23 Dismans, and that claim already was adjudicated by Judge Timothy Williams.
The matter is now on appeal before the Nevada Supreme Court, and the matter
has been fully briefed by the parties, including the Dismans.

24 The only cause of action between the Lytles and Dismans is a single
25 cause of action by the Lytles for declaratory relief. Specifically, the Lytles
26 sought a declaration from the Court that the Lytles could lawfully record an
27 Abstract of Judgment recorded against the Dismans’ property. (Citation
omitted). ***The claim was fully adjudicated by Judge Williams in this very
matter on July 25, 2017, when Judge Williams found that the Abstract of
Judgment recorded on the Dismans’ property clouded title.*** Judge Williams
28 quieted title to the property, expunged the Abstract of Judgment, and issued an

1 injunction preventing the Lytles from further clouding title to the Dismans'
2 property.

3 The Lytles then appealed that decision, and the appeal is fully briefed
4 and awaiting disposition before the Nevada Supreme Court. The Dismans are
5 parties to the appeal and submitted briefing on the issues. ***There is simply
nothing for this Court now to consider as all claims between these parties
already were adjudicated.***

6 *See*, the Lytles' Opp'n to Mot. for Summ. J. or, in the Alternative, Mot. for J. on the Pleadings,
7 attached hereto as **Exhibit J**, at 2:9-24 (emphasis added).⁴ The Lytles' argument was utterly
8 disingenuous as they brought their Counterclaim against the Dismans AFTER and in spite of the
9 Court's July 2017 Order. *See* Exhibit I.

10 On or about December 27, 2018, the Court (Judge Mark B. Bailus) denied the Dismans'
11 motion as moot, holding that this Court's July 2017 Order encompasses the Lytles'
12 Counterclaim and prevents the Lytles from recording an abstract of the Rosemere Judgment II
13 against the Dismans' property. *See* Notice of Entry of Order Den. the Dismans Mot. for Summ.
14 J. or, in the Alternative, Mot. for J. on the Pleadings, attached hereto as **Exhibit K**. ***The Court's
holding, as well as the Lytles' argument in opposition to the Dismans' motion, begged the
question of why did the Lytles bring the Counterclaim against the Dismans at all.***

16 In the meantime, on or about December 4, 2018, the Nevada Supreme Court affirmed
17 this Court's July 2017 Order in its entirety. *See* Order of Affirmance, attached hereto as **Exhibit**
18 **L**. As a result, the Lytles agreed to dismiss the Counterclaim against the Dismans without
19 prejudice.

20 On January 23, 2019, the Dismans filed a motion against the Lytles for attorney's fees
21 incurred through January 22, 2019. On or about September 4, 2019, this Court granted the
22 Dismans' motion and awarded them fees pursuant to the terms of the Original CC&Rs. *See*
23 Findings of Fact, Conclusions of Law and Order Granting the Dismans' Mot. for Attorney's
24 Fees, attached hereto as **Exhibit M**. On September 30, 2019, the Lytles appealed the fee award
25 to the Nevada Supreme Court ("Attorney's Fee Appeal").

26 Recently, the Dismans and the Lytles settled the Attorney's Fee Appeal, and although
27

28 ⁴ The opposition is attached hereto without its accompanying exhibits to reduce the volume of this submission.

1 the Dismans have incurred substantially more attorney's fees than what they are currently
2 requesting, including, but not limited to, fees associated with the Attorney's Fee Appeal, none of
3 those fees are included in their instant request given the settlement of the appeal.

4 **F. The Consolidated Action**

5 On November 30, 2017, a complaint was filed against the Lytles in district court (Case
6 No. A-17-765372-C) by other Rosemere property owners September Trust, dated March 23,
7 1972; Gerry R. Zobrist and Jolin G. Zobrist, as Trustees of the Gerry R. Zobrist and Jolin G.
8 Zobrist Family Trust; Raynaldo G. Sandoval and Julie Marie Sandoval Gegen, as Trustees of the
9 Raynaldo G. and Evelyn A. Sandoval Joint Living and Devolution Trust Dated May 27, 1992;
10 and Dennis A. Gegen and Julie S. Gegen (at times collectively referred to herein as, the
11 "September Trust Plaintiffs").

12 The complaint stated claims for quiet title and declaratory relief, and sought, *inter alia*, a
13 declaration that the Lytles cannot record or enforce the judgments that they obtained in the
14 Rosemere Litigation I, II or III against the September Trust Plaintiffs or their properties within
15 the subdivision. *See id.* Case No. A-17-765372-C was consolidated with this case, and the
16 September Trust Plaintiffs moved for summary judgment on their claims for relief.

17 Based upon this Court's July 2017 Order, the Court granted summary judgment in their
18 favor, holding that the Lytles improperly clouded title to the September Trust Plaintiffs'
19 properties by recording abstracts of the Rosemere Judgment I against them; that those abstracts
20 of judgment should be released; and that the Lytles are permanently enjoined from recording
21 and enforcing any of the judgments that they obtained in the Rosemere Litigation I, II or III
22 against these plaintiffs' properties and from taking any action in the future directly against these
23 plaintiffs or their properties based upon the Rosemere Litigation I, II or III. *See* Order Granting
24 Mot. for Summ. J or, in the Alternative, Mot. for J. on the Pleadings and Denying
25 Countermotion for Summ. J., attached hereto as **Exhibit N**, at pp. 9-10.

26 **G. The Receiver Action**

27 On June 8, 2018, and in direct violation of this Court's orders, the Lytles commenced an
28 action in another department of the district court in an effort to enforce their judgments against

the Association against the property owners within the subdivision (Case No. A-18-775843-C) (at times referred to herein as, the “receiver action”). *See* Compl. for Declaratory Relief and Preliminary Injunction, attached hereto as **Exhibit O**. Through the receiver action, the Lytles obtained the appointment of a receiver over the Association to, among other things, “[i]ssue and collect a special assessment upon all owners within the Association to satisfy the Lytle[s] ... judgments against the Association.” *See* January 22, 2020, Correspondence from Kevin Singer to the Dismans, attached hereto as **Exhibit P**, at its Exhibit 1, p. 2, ¶ 2. The Lytles maintained the receiver action even though shortly after its commencement, the Nevada Supreme Court affirmed this Court’s injunction. *See* Exhibit L.

The Dismans first learned of the receiver action on or about January 22, 2020 when the receiver sent them correspondence inviting them to meet with him to share ideas on how to pay the Lytles’ judgments. *See* Exhibit P. In response to similar correspondences that the receiver sent them, the September Trust Plaintiffs filed a motion with this Court for an order to show cause why the Lytles should not be held in contempt for violating this Court’s orders and the injunctions contained therein (“Contempt Motion”). *See* Contempt Motion, attached hereto as **Exhibit Q**.⁵ The Dismans joined in the Contempt Motion. *See* Joinder to Contempt Motion, attached hereto as **Exhibit R**.

On May 22, 2020, this Court entered an order granting the Contempt Motion and the Dismans’ joinder thereto. *See* Order Granting Contempt Motion, attached hereto as **Exhibit S**. Based upon their violation, the Court ordered the Lytles to, among other things, pay a \$500 fine to the Dismans. *Id.* at 12:9-12. Additionally, the Court provided that the Dismans “may file applications for their reasonable expenses, including, without limitation, attorney’s fees, incurred ... as a result of the contempt.” *Id.* at 13:1-3.

III. LEGAL ARGUMENT

Rule 54(d)(2)(B) of the Nevada Rules of Civil Procedure provides that a motion for attorney’s fees must:

⁵ The motion is attached hereto without its accompanying exhibits to reduce the volume of this submission.

- (i) be filed no later than 21 days after written notice of entry of judgment is served;
- (ii) specify the judgment and the statute, rule, or other grounds entitling the movant to the award;
- (iii) state the amount sought or provide a fair estimate of it;
- (iv) disclose, if the court so orders, the nonprivileged financial terms of any agreement about fees for the services for which the claim is made; and
- (v) be supported by:
 - (a) counsel's affidavit swearing that the fees were actually and necessarily incurred and were reasonable;
 - (b) documentation concerning the amount of fees claimed; and
 - (c) points and authorities addressing the appropriate factors to be considered by the court in deciding the motion.

The Dismans have complied with each of these requirements by bringing this Motion within 21 days after service of notice of entry of the Contempt Order, *see* Exhibit S, and attaching their attorney's time sheets and affidavit, *see* Exhibits A and B.

"The decision whether to award attorney's fees is within the sound discretion of the district court." *Thomas v. City of N. Las Vegas*, 122 Nev. 82, 90, 127 P.3d 1057, 1063 (2006). The long-standing rule in Nevada is that attorney's fees should be awarded when authorized by statute, rule, or agreement. *Elwardt v. Elwardt*, No. 69638, 2017 WL 2591349 *2 (Nev. Ct. App. June 9, 2017) (unpublished disposition) (citing *First Interstate Bank of Nev. v. Green*, 101 Nev. 113, 116, 694 P.2d 496, 498 (1985)). This Court should exercise its discretion and award attorney's fees to the Dismans because it is authorized to do so pursuant to the terms of NRS 22.100, the Original CC&Rs and NRS 18.010(2)(b).

A. The Court Should Award the Dismans Their Attorney's Fees Pursuant to NRS 22.100.

NRS 22.010(3) defines an act constituting contempt as including "[d]isobedience or resistance to any lawful writ, order, rule or process issued by the court or judge at chambers." NRS 22.100 provides the following penalties for contempt:

1. Upon the answer and evidence taken, the court or judge or jury, as the case may be, shall determine whether the person proceeded against is guilty of the contempt charged.

2. Except as otherwise provided in NRS 22.110, if a person is found guilty of contempt, a fine may be imposed on the person not exceeding \$500 or the person may be imprisoned not exceeding 25 days, or both.

3. In addition to the penalties provided in subsection 2, *if a person is found guilty of contempt pursuant to subsection 3 of NRS 22.010, the court may require the person to pay to the party seeking to enforce the writ, order, rule or process the reasonable expenses, including, without limitation, attorney's fees, incurred by the party as a result of the contempt.*

(Emphasis added). As the Nevada Supreme Court instructs, a district court has “inherent power to protect the dignity and decency of its proceedings and to enforce its decrees, and thus it may issue contempt orders and sanction or dismiss an action for litigation abuses.” *Halverson v. Hardcastle*, 123 Nev. 245, 261, 163 P.3d 428, 440 (2007).

Here, the Court determined that the Lytles violated its orders when it “initiated an action against the Association that included a prayer for appointment of a receiver, applied for appointment of a receiver, and argued that the Association, through the Receiver, could make special assessments on the ... property owners for the purpose of paying the Rosemere Judgments, all while failing to inform the Receivership Court of this Case, this Court’s Orders, or that the Lytle Trust had been enjoined from enforcing the Rosemere Judgments against the Plaintiffs, the Boulden Trust, the Lamothe Trust, and the Dismans, or their properties.” *See* Exhibit S at 11:3-8.

Based upon the violation, the Court ordered the Lytles to, among other things, pay a \$500 fine to the Dismans. *See id.* at 12:9-12. Additionally, the Court provided that the Dismans “may file applications for their reasonable expenses, including, without limitation, attorney’s fees, incurred ... as a result of the contempt.” *See id.* at 13:1-3.

Given the Lytles’ willful violation of the Courts’ orders in a case that never should have been brought against the Dismans in the first place, this Court should award the Dismans all of their attorney’s fees incurred as a result of the violation.

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B. The Terms of the Original CC&Rs Provide an Additional Basis for the Award of Attorney's Fees to the Dismans.

Under NRS 18.010(1), "[t]he compensation of an attorney and counselor for his services is governed by agreement, express or implied, which is not restrained by law."

Section 25 of the Original CC&Rs governing Rosemere provides:

25. Attorney's Fees: In any legal or equitable proceeding for the enforcement of or to restrain the violation of the Declaration of Covenants, Conditions and Restrictions or any provision thereof, the losing party or parties shall pay in such amount as may be fixed by the court in such proceeding.

See Exhibit C.

This Court previously awarded the Dismans their attorney's fees under Section 25 of the Original CC&Rs. *See Exhibit M.* Specifically, the Court found that the Lytles brought the Counterclaim against the Dismans seeking to enforce, among other things, their alleged rights under the Original CC&Rs against the Dismans. *See id.* at p. 7, ¶ 3. It noted that the Counterclaim alleges in pertinent part:

28. There exists a controversy between the Lytles and the Counter-defendants and Third-Party Defendants regarding the interpretation, application and **enforcement** of NRS, Chapter 116 as well as the application of the Original CC&Rs and Amended CC&Rs to the controversy at hand, requiring a determination by this Court and entry of declaratory relief.

29. Specifically, the Lytles contend as follows:

- a. Pursuant to the Original CC&Rs, a lien or judgment against the association established under the Original CC&Rs attaches to each lot within the Association.
- b. Pursuant to the Amended CC&Rs, which were in force at all times from 2007 through July 29, 2013, a lien or judgment against the Association established under the Amended CC&Rs attaches to each lot with the Association.
- c. Pursuant to NRS, Chapter 116, the Uniform Common Interest Development Act, a lien or judgment against the Association attached to each lot within the Association, even if the Association is a limited purpose association, because under NRS 116.021, each common interest community consists of all "real estate described in a declaration with respect to which a person, by virtue of the person's ownership of a unit, is obligated to pay for a share of real estate taxes, insurance premiums, maintenance or improvement of, or services or other expenses related to, common elements, other units or other

1 real estate described in that declaration.” Further under
 2 NRS 116.093, each “unit” is defined as the “physical
 3 portion of the common-interest community designated for
 4 separate ownership or occupancy...” Thus, the association,
 or common interest community, includes each and every
 unit in the community, including those owned by third
 parties.

5 d. Pursuant to NRS 116.3117, which governed the
 6 Association and all owners during the underlying
 7 litigation, a judgment against the Association is a lien in
 8 favor of the Lytles against all of the real property within
 9 the Association and all of the units therein, including
 10 Counter-Defendants’ properties. The association and its
 11 membership are not entitle to use Chapter 116 and all of
 12 its provisions as a sword during the litigation against the
 Lytles, e.g. to record multiple liens totaling \$209,883.19
 against the Lytles and attempt foreclosure against the Lytle
 Property forcing to procure a \$123,000.00 cash bond to
 prevent such foreclosure, and then a shield to defend
 against the Lytles after they prevailed in that litigation and
 the Association was declared a limited purpose
 association.

13 30. The Lytles desire a judicial determination of the parties’ rights and duties
 14 and a declaration (that) the lien against the Association, specifically, the Abstract
 of judgment issued in the NRED II Litigation,⁶ can be recorded against 1830
 Rosemere Court and 1960 Rosemere Court.

15 *See id.* (Emphasis in the original).

16 Given the nature of the Counterclaim, as well as the overall case in which the parties
 17 sought to enforce their alleged rights under the Original CC&Rs, the Court concluded that
 18 Section 25 of the Original CC&Rs applied to control the award of attorney’s fees. *See id.* at ¶ 4.
 19 Further, the Court concluded that in applying the language of Section 25, the Dismans were the
 20 winning parties and the Lytles were the losing parties, such that the assessment of attorney’s
 21 fees against the Lytles was mandatory under Section 25. *See id.* at ¶ 5.

22 Section 25 the Original CC&Rs likewise applies to the Dismans’ instant request for
 23 attorney’s fees. The Dismans were forced to address the Lytles’ contempt in order to uphold
 24 this Courts orders and the injunctions contained therein. All of those orders resulted from the
 25 Court’s enforcement of the Original CC&Rs which established the Rosemere Association as a
 26

27
 28 ⁶ The NRED II Litigation is referred to herein as the Rosemere Litigation II.

1 limited-purpose association to which NRS 116.3117 does not apply. The Dismans' efforts were
 2 successful in that the Court held the Lytles in contempt for violation of its orders. Accordingly,
 3 the Dismans, as the winning parties, are entitled to recover their attorney's fees pursuant to the
 4 terms of the Original CC&Rs.

5 **C. NRS 18.010(2)(b) Provides Yet Another Basis for the Award of Attorney's**
 6 **Fees to the Dismans .**

7 NRS 18.010(2) provides in relevant part as follows:

8 2. In addition to the cases where an allowance is authorized by specific
 9 statute, the court may make an allowance of attorney's fees to a prevailing
 10 party:

11 (b) Without regard to the recovery sought, when the court finds that
 12 the claim, counterclaim, cross-claim or third-party complaint or
 defense of the opposing party was brought or maintained without
 reasonable ground or to harass the prevailing party. The court
 shall liberally construe the provisions of this paragraph in favor of
 awarding attorney's fees in all appropriate situations. . . .

13 A groundless claim is a claim that is "not supported by any credible evidence at trial."
 14 *Allianz Ins. Co. v. Gagnon*, 109 Nev. 990, 995-96, 860 P.2d 720, 724 (1993). A frivolous claim
 15 is a claim that is "baseless", which is defined as a pleading that is "not well grounded in fact or
 16 not warranted by existing law or a good faith argument for the extension, modification or
 17 reversal of existing law." *Simonian v. Univ. & Cmty. Coll. Sys.*, 122 Nev. 187, 196, 128 P.3d
 18 1057, 1063 (2006). Furthermore, in assessing the award of attorney's fees under NRS
 19 18.010(2)(b), the Court must consider if a party had reasonable grounds for making or defending
 20 its claims, based on actual circumstances of the case. *Bergmann v. Boyce*, 109 Nev. 670, 675,
 21 856 P.2d 560, 563 (1993).

22 As the Court found here, what the Lytles sought to accomplish through the receiver
 23 action was in direct violation of this Court's orders and the injunctions contained therein. *See*
 24 Exhibit S. The Court determined that the Lytles violated its orders when it "initiated an action
 25 against the Association that included a prayer for appointment of a receiver, applied for
 26 appointment of a receiver, and argued that the Association, through the Receiver, could make
 27 special assessments on the ... property owners for the purpose of paying the Rosemere
 28 Judgments...." *See id.* at 11:3-8. As such, the Lytles' receiver action, to the extent that it

sought the appointment of a receiver to collect on the Lytles' judgments from the property owners, was brought and maintained without reasonable ground or to harass, and the Dismans are entitled to an award of their attorney's fees under NRS 18.010(2)(b).

D. The Attorney's Fees Sought Are Reasonable and Justified in Amount.

Under Nevada law, the basic elements to be considered in determining the reasonable value of an attorney's service are: "(1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorneys was successful and what benefits were derived." *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969) (internal citations omitted). "Furthermore, good judgment would dictate that each of these factors be given consideration by the trier of fact and that no one element should predominate or be given undue weight." *Id.*, at 349-50, 33.

The qualities of the advocate's ability, training, education, experience, professional standing, and skill from the Dismans' attorney establish the reasonableness of the fees sought. *See Exhibit B.* The difficulty, intricacy, importance, time and skill required, and responsibility imposed likewise establish the reasonableness of the Dismans' attorney's fees. *See id.* What the Lytles sought to accomplish through the receiver action required extensive investigation, analysis, research and preparation by the Dismans' attorney. Moreover, it required the Dismans' attorney not only to participate in the contempt proceedings in this case but also to monitor the receiver action.

The skill, time, and attention given to the work are also indicative of the reasonableness of the Dismans' attorney's fees. *See id.* As shown in the Court records and attached time sheets, the contempt matter was contentious and zealously litigated. Tremendous attention and time was paid to the matter. The preparation of the Dismans' attorney was detailed and complete and the fees charged were reasonable and necessary.

1 The final factor depends on the success and benefits derived from the efforts of the
2 Dismans' attorney. Through those efforts, the Dismans succeeded in establishing the Lytles'
3 contempt. Accordingly, the Lytles cannot reasonably argue that the result obtained was not a
4 successful result for the Dismans.

5 In sum, this Court should find that all of the *Brunzell* factors have been satisfied and
6 sufficient basis exists to award reasonable attorney's fees in the amount of \$7,920.00 incurred
7 by the Dismans in connection with the Lytles' violation of the Court's orders.

8 **IV. CONCLUSION**

9 For the above and foregoing reasons, the Dismans respectfully request that the Court
10 grant their Motion in its entirety.

11 DATED this 11th day of June, 2020.

12 FIDELITY NATIONAL LAW GROUP

13
14 /s/ Christina H. Wang
15 CHRISTINA H. WANG, ESQ.
16 Nevada Bar No. 9713
17 8363 W. Sunset Road, Suite 120
18 Las Vegas, Nevada 89113
19 *Attorneys for Counter-Defendants/
20 Cross-Claimants Robert Z. Disman
21 and Yvonne A. Disman*
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned employee of Fidelity National Law Group, hereby certifies that she served a copy of the foregoing **ROBERT Z. DISMAN AND YVONNE A. DISMAN'S MOTION FOR ATTORNEY'S FEES** upon the following parties on the date below entered (unless otherwise noted), at the fax numbers and/or addresses indicated below by: ☐ (i) placing said copy in an envelope, first class postage prepaid, in the United States Mail at Las Vegas, Nevada, ☐ (ii) via facsimile, ☐ (iii) via courier/hand delivery, ☐ (iv) via overnight mail, ☐ (v) via electronic delivery (email), and/or ☒ (vi) via electronic service through the Court's Electronic File/Service Program.

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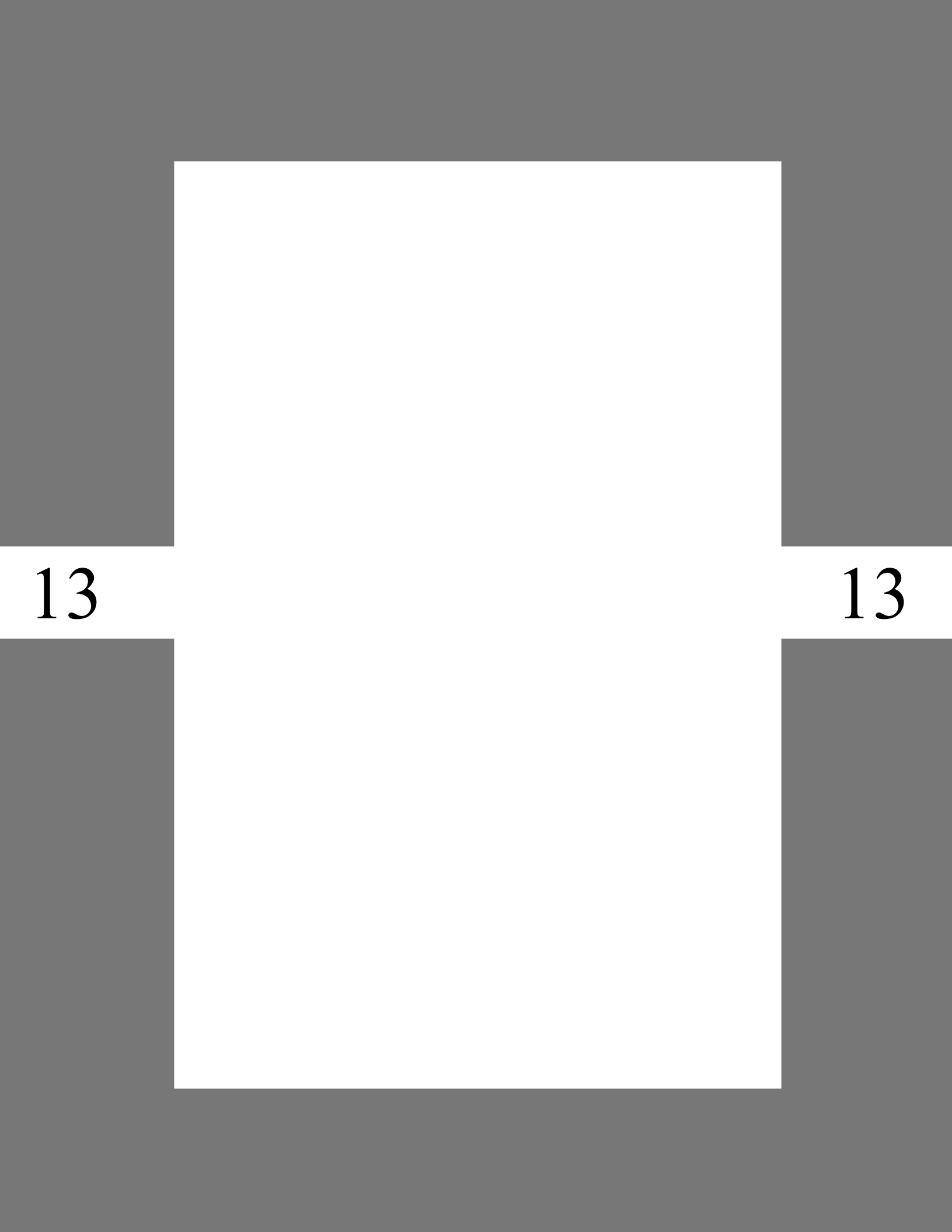
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Attorneys for Boulden and Lamothe

DATED: 06/11/2020

/s/ Lace Engelman

An employee of Fidelity National Law Group



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Steven D. Grierson

CLERK OF THE COURT

**APEN**

CHRISTINA H. WANG, ESQ.

Nevada Bar No. 9713

FIDELITY NATIONAL LAW GROUP

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*Attorneys for Counter-Defendants/Cross-Claimants**Robert Z. Disman and Yvonne A. Disman***DISTRICT COURT****CLARK COUNTY, NEVADA**

MARJORIE B. BOULDEN, TRUSTEE OF
THE MARJORIE B. BOULDEN TRUST,
LINDA LAMOTHE AND JACQUES
LAMOTHE, TRUSTEES OF THE JACQUES
& LINDA LAMOTHE LIVING TRUST,

Plaintiffs,

vs.

TRUDI LEE LYTLE, JOHN ALLEN LYTLE,
THE LYTLE TRUST, DOES I through X, and
ROE CORPORATIONS I through X,

Defendants.

Case No.: A-16-747800-C

Dept. No.: XVI

**APPENDIX OF EXHIBITS FOR
ROBERT Z. DISMAN AND YVONNE
A. DISMAN'S MOTION FOR
ATTORNEY'S FEES**

AND ALL RELATED MATTERS

EXHIBIT NO.	DESCRIPTION	PAGE NOS.
A	Dismans' Attorney's Time Sheet	001-006
B	Affidavit of Counsel in Support of Robert Z. Disman and Yvonne A. Disman's Motion for Attorney's Fees	007-012
C	Declaration of Covenants, Conditions and Restrictions	013-017
D	Order Granting the Lytles' Motion for Summary Judgment	018-030
E	Abstract of Judgment	031-033

F	Abstract of Judgment	034-036
G	Order Granting the Lytles' Motion for Attorneys' Fees	037-041
H	Order Granting Motion to Alter or Amend Findings of Fact and Conclusions of Law	042-049
I	Lytles' Answer to Plaintiffs' Second Amended Complaint and Counterclaim	050-066
J	Lytles' Opposition to Motion for Summary Judgment or, in the Alternative, Motion for Judgment on the Pleadings	067-093
K	Notice of Entry of Order Denying the Dismans Motion for Summary Judgment or, in the Alternative, Motion for Judgment on the Pleadings	094-103
L	Order of Affirmance	104-113
M	Findings of Fact, Conclusions of Law and Order Granting the Dismans' Motion for Attorney's Fees	114-125
N	Order Granting Motion for Summary Judgment or, in the Alternative, Motion for Judgment on the Pleadings and Denying Countermotion for Summary Judgment	126-140
O	Complaint For Declaratory Relief and Preliminary Injunction	141-149
P	January 22, 2020, Correspondence from Kevin Singer to the Dismans'	150-171
Q	Contempt Motion	172-192
R	Joinder to Contempt Motion	193-196
S	Order Granting Contempt Motion	197-214

DATED this 11th Day of June, 2020.

FIDELITY NATIONAL LAW GROUP

/s/ Christina H. Wang

CHRISTINA H. WANG, ESQ.

Nevada Bar No. 9713

8363 W. Sunset Road, Suite 120

Las Vegas, Nevada 89113

*Attorneys for Counter-Defendants/
Cross-Claimants Robert Z. Disman
and Yvonne A. Disman*

CERTIFICATE OF SERVICE

The undersigned employee of Fidelity National Law Group, hereby certifies that she served a copy of the foregoing **APPENDIX OF EXHIBITS FOR ROBERT Z. DISMAN AND YVONNE A. DISMAN'S MOTION FOR ATTORNEY'S FEES** upon the following parties on the date below entered (unless otherwise noted), at the fax numbers and/or addresses indicated below by: ☐ (i) placing said copy in an envelope, first class postage prepaid, in the United States Mail at Las Vegas, Nevada, ☐ (ii) via facsimile, ☐ (iii) via courier/hand delivery, ☐ (iv) via overnight mail, ☐ (v) via electronic delivery (email), and/or ☒ (vi) via electronic service through the Court's Electronic File/Service Program.

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Las Vegas, Nevada 89101
Attorneys for Boulden and Lamothe

DATED: 06/11/2020

/s/ Lace Engelman

An employee of Fidelity National Law Group

EXHIBIT A

000498

000498

FIDELITY NATIONAL LAW GROUP

8363 West Sunset Road, Suite 120
Las Vegas, Nevada 89113

TIME SHEET

Client Name: Robert Z. Disman and Yvonne A. Disman
File Number: L080698 – *Lytle v. Disman*
Attorney: Christina H. Wang, Esq.
Hourly Rate: \$200.00

01/27/2020	Initial receipt, review and respond to multiple correspondences from client R. Disman re appointment of receiver over HOA and demand for payment of the Lytle Trust's judgments. Conduct investigation of same. Prepare correspondence to attorney W. Smith re same. Telephone conference with Mr. Smith re same. Prepare correspondence to claims counsel D. Chien re same.	1.30	\$260.00
01/29/2020	Initial receipt, review and respond to correspondence from attorney W. Smith re the Lytle Trust's receiver action. Telephone conference with Mr. Smith re same. Telephone call to claims counsel D. Chien re same. Initial receipt, review and respond to correspondence from Ms. Chien re same.	0.90	\$180.00
01/30/2020	Telephone conference with client R. Disman re the Lytle Trust's receiver action.	0.80	\$160.00
01/31/2020	Telephone conference with attorney W. Smith re status of the Lytle Trust's receiver action.	0.60	\$120.00
02/04/2020	Prepare correspondence to claims counsel D. Chien re the Lytle Trust's receiver action.	0.10	\$20.00
02/05/2020	Initial receipt, review and respond to multiple correspondences from claims counsel D. Chien re the Lytle Trust's receiver action. Telephone conference with Ms. Chien re same.	1.10	\$220.00
02/06/2020	Initial receipt and review of multiple correspondences from claims counsel D. Chien and legal assistant L. Engelman re request for case pleadings re receiver action.	0.60	\$120.00
03/04/2020	Initial receipt, review and respond to multiple correspondences from attorneys W. Smith and D. Foley re the September Trust Plaintiffs' motion to intervene in receiver action, and motion for an order to show cause why the Lytle Trust should not be held in contempt for violation of court orders. Review motions and conduct further research re same.	1.20	\$240.00
03/05/2020	Initial receipt and review of clerk's notice of hearing re the September Trust Plaintiffs' motion for an order to show cause why the Lytle Trust should not be held in contempt for	0.70	\$140.00

	violation of court orders. Initial receipt and review of the Boulden parties' joinder thereto. Initial receipt and review of the September Trust Plaintiffs' motion to intervene in receiver action and notice of hearing re same.		
03/06/2020	Prepare notice of appearance on behalf of the Dismans. Prepare joinder to the September Trust Plaintiffs' motion for an order to show cause why the Lytle Trust should not be held in contempt for violation of court orders. Initial receipt and review of multiple court correspondences confirming filing and service of same.	0.50	\$100.00
03/09/2020	Initial receipt and review of correspondence from attorney W. Smith re the Lytle Trust's receiver action. Telephone conference with client R. Disman re same. Telephone conference with Mr. Smith re same.	1.70	\$340.00
03/11/2020	Initial receipt and review of association of counsel for the Lytle Trust. Telephone conference with client R. Disman re receiver action.	0.80	\$160.00
03/17/2020	Initial receipt and review of correspondence from attorney W. Smith re receiver action.	0.10	\$20.00
03/19/2020	Initial receipt, review and detailed legal analysis of the Lytle Trust's opposition to the September Trust Plaintiffs' motion for an order to show cause why the Lytle Trust should not be held in contempt for violation of court orders.	0.80	\$160.00
03/26/2020	Initial receipt and review of correspondence from claims counsel D. Chien re case status.	0.10	\$20.00
03/31/2020	Initial receipt and review of notice of rescheduling of hearing on the September Trust Plaintiffs' motion for order to show cause why the Lytle Trust should not be held in contempt for violation of court orders.	0.10	\$20.00
04/06/2020	Initial receipt and review of minute order re upcoming hearing on the September Trust Plaintiffs' motion for order to show cause why the Lytle Trust should not be held in contempt for violation of court orders.	0.10	\$20.00
04/13/2020	Initial receipt and review of the Lytle Trust's counsel's multiple notices of court call appearance re upcoming hearing on the September Trust Plaintiffs' motion for order to show cause why the Lytle Trust should not be held in contempt for violation of court orders. Initial receipt and review of the Lytles' correction to opposition to motion.	0.30	\$60.00
04/14/2020	Initial receipt, review and detailed legal analysis of the September Trust Plaintiffs' reply in support of motion for an order to show cause why the Lytle Trust should not be held in contempt for violation of court orders. Prepare joinder to reply. Exchange multiple correspondences with legal assistant L. Engelman re same. Initial receipt and review of court correspondence confirming filing and service of same.	1.00	\$200.00