

IN THE SUPREME COURT OF THE STATE OF NEVADA

FIRST 100, LLC, a Nevada limited liability company; 1st ONE HUNDRED HOLDINGS, LLC, a Nevada limited liability company,

Appellants

vs.

TGC/FARKAS FUNDING, LLC,

Respondent.

Case No. 83177

Electronically Filed
Nov 17 2021 04:58 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

from a decision in favor of Respondent
entered by the Eighth Judicial District Court, Clark County, Nevada
The Honorable Mark R. Denton, District Court Judge
District Court Case No. A-20-822273-C

APPELLANTS' APPENDIX VOLUME V

DATE	DESCRIPTION	VOLUME	PAGES
04/09/2021	Declaration of Erika Pike Turner, Esq. in Support of Award of Fees and Costs	IV	AA0943-0986
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10/15/2020	Defendants' Limited Opposition to Motion to Confirm Arbitration Award and Countermotion to Modify Award Per NRS 38.242	I	AA0041-0046
01/19/2021	Defendants' Motion to Enforce Settlement Agreement and Vacate Post-Judgment Discovery Proceedings on <i>Ex Parte</i> Order Shortening Time	I	AA0156-0208
11/24/2020	Defendants' Opposition to Motion for Attorneys' Fees and Costs	I	AA0111-0115

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01/27/2021	Defendants' Reply in Support of Motion to Enforce Settlement Agreement and Vacate Post-Judgment Discovery Proceedings and Opposition to Countermotion to Strike the Affidavit of Jason Maier and Opposition to Countermotion for Sanctions	II	AA0362-0492
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10/01/2020	Motion to Confirm Arbitration Award	I	AA0001-0040
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04/07/2021	Notice of Entry of Findings of Fact, Conclusions of Law & Order Re Evidentiary Hearing	IV	AA0903-0942
02/09/2021	Notice of Entry of Order	III	AA0516-0520
06/11/2021	Notice of Entry of Order Awarding Attorneys' Fees and Costs	VI	AA1340-1344
12/21/2020	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Judgment Debtor Examination of First 100, LLC	I	AA0131-0140
12/21/2020	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Judgment Debtor Examination of First One Hundred Holdings, LLC AKA 1 st One Hundred Holdings LLC	I	AA0141-0150
12/21/2020	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Order to Show Cause Why Defendants and Jay Bloom Should Not Be Held in Contempt of Court	I	AA0151-0155
01/27/2021	Notice of Entry of Order Granting Plaintiff's Motion for Attorneys' Fees and Costs	II	AA0356-0361

11/17/2020	Notice of Entry of Order Granting Plaintiff's Motion to Confirm Arbitration Award and Denying Defendants' Countermotion to Modify Award; and Judgment	I	AA0060-0068
01/26/2021	Opposition to Defendants' Motion to Enforce Settlement and Vacate Post-Judgment Discovery Proceedings; and Countermotion 1) to Strike the Affidavit of Jason Maier, and 2) for Sanctions	II	AA0330-0351
02/09/2021	Order	III	AA0513-0515
06/11/2021	Order Awarding Attorneys' Fees and Costs	VI	AA1337-1339
01/27/2021	Order Granting Plaintiff's Motion for Attorneys' Fees and Costs	II	AA0352-0355
11/17/2020	Order Granting Plaintiff's Motion to Confirm Arbitration Award and Denying Defendants' Countermotion to Modify Award; and Judgment	I	AA0053-0059
12/18/2020	Plaintiff's Ex Parte Application for Order to Show Cause Defendants and Jay Bloom Should Not Be Held in Contempt of Court	I	AA0123-0130
10/26/2020	Plaintiff's Reply to Defendants' Limited Opposition to Motion to Confirm Arbitration Award and Opposition to Defendants' Countermotion to Modify Award Per NRS 38.242	I	AA0047-0052
03/03/2021	Recorder's Transcript of Evidentiary Hearing	III/IV	AA0537-0764
03/10/2021	Recorder's Transcript of Evidentiary Hearing	IV	AA0765-0902
03/01/2021	Recorder's Transcript of Hearing Re: Motion to Compel and For Sanctions; Application for Ex-Parte Order Shortening Time	III	AA0521-0536
01/21/2021	Recorder's Transcript of Hearing Re: Show Cause Hearing	II	AA0323-0329

12/14/2020	Reply in Support of Motion for Attorneys' Fees and Costs	I	AA0116-0122
04/23/2021	Reply to Defendants' Opposition to Motion for Attorneys' Fees and Costs	V/VI	AA0995-1336
01/20/2021	Supplement to Plaintiff's Ex Parte Application for Order to Show Cause Why Defendants and Jay Bloom Should Not Be Held in Contempt of Court	I/II	AA0215-0322
01/28/2021	Transcript of Proceedings Re: Show Cause Hearing/Defendant's Motion to Enforce Settlement Agreement and Vacate Post-Judgment Discovery Proceedings on Ex-Parte Order Shortening Time	III	AA0493-0512

CERTIFICATE OF SERVICE

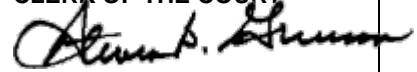
I certify that on the 17th day of November, 2021, this document was electronically filed with the Nevada Supreme Court. Electronic service of the foregoing: **APPELLANTS' OPENING BRIEF** and **VOLUMES I – VI** of the **APPENDIX** shall be made in accordance with the Master Service List as follows:

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Attorneys for TGC Farkas Funding LLC

DATED this 17th day of November, 2021.

/s/ Brandon Lopipero

An Employee of MAIER GUTIERREZ & ASSOCITES



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DISTRICT COURT

CLARK COUNTY, NEVADA

TGC/FARKAS FUNDING, LLC,

Plaintiff,

vs.

FIRST 100, LLC, a Nevada limited liability
company; 1st ONE HUNDRED HOLDINGS,
LLC, a Nevada limited liability company,

Defendants.

Case No: A-20-822273-C

Dept. No.: XIII

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S DECLARATION IN
SUPPORT OF FEES AND COSTS AWARD**

Defendants First 100, LLC and 1st One Hundred Holdings, LLC, and non-party Jay Bloom (collectively "First 100"), by and through their attorneys of record, the law firm MAIER GUTIERREZ & ASSOCIATES, hereby submit this opposition to the declaration of Erika Pike Turner, Esq., which was filed in support of the Court's award of fees and costs to plaintiff TGC/Farkas Funding, LLC ("Plaintiff").

This opposition is based on the following Memorandum of Points and Authorities and any oral argument entertained at any hearing on the declaration.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 In its Findings of Fact, Conclusions of Law, and Order, this Court determined that “Defendants
4 and Bloom are jointly and severally responsible for the payment of all the reasonable fees and costs
5 incurred by Plaintiff since entry of the Order for the purpose of coercing compliance with the Order
6 in order to make them whole, inclusive of responding to the Motion to Enforce and bringing the
7 Motion to Compel.” FFCL at p. 35. Specifically, the Court ordered:

8 Within 10 days of this order, counsel for Plaintiff shall provide a declaration and
9 supporting documentation as necessary to meet the factors outlined in *Brunzell v.*
10 *Golden Gate National Bank*, 85 Nev. 345, 55 P.2d 31 (1969), and delineating the fees
and costs expended in *relating to the Motion to Compel, Motion to Enforce and*
OSC

11 *See* 4/7/2021 FFCL at p. 35, *on file* (emphasis added).

12 Plaintiff is seeking over \$160,000 in purported attorneys’ fees for work that is supposed to be
13 related to the motion to compel, motion to enforce settlement, and motion for an order to show cause,
14 the earliest of which was filed on December 18, 2020. In other words, Plaintiff is asking for \$160,000
15 for less than four months of attorney work.

16 The level of overworking and overbilling by Plaintiff’s counsel for four months of work is
17 egregious to the point that the fees requested clearly do not comply with the *Brunzell* factors.

18 The amount requested includes not only the fees that Plaintiff purportedly incurred, but that
19 were purportedly incurred on behalf of Matthew Farkas, who has never been deemed a prevailing
20 party in this matter, nor has the Court awarded fees to Mr. Farkas.

21 Further, the fee invoice records reflect the wasteful pattern of Plaintiff’s attorneys Garman
22 Turner Gordon commonly using two attorneys (each of whom have more than 10 years of litigation
23 experience) in situations where only one was warranted, which naturally inflated the attorneys’ fees.
24 This includes Garman Turner Gordon needlessly having two attorneys prepare for and sit in on the
25 depositions leading up to the evidentiary hearing in this case, and going far beyond the scope of this
26 dispute in those depositions to ensure that they lasted for hours on end.

27 As such, the Court should set an appropriately-reduced award in order to prevent Plaintiff from
28 obtaining a windfall on this dispute which stems from a nominal original judgment (that Plaintiff has

1 already been awarded fees and costs on) and which cumulated in a mere two day evidentiary hearing.

2 **II. LEGAL ARGUMENT**

3 In considering a request for attorney's fees, the Court must analyze the factors set forth in
4 *Brunzell v. Golden Gate National Bank*, 95 Nev. 345, 349 (1969), namely, the advocate's professional
5 qualities, the nature of the litigation, the work performed, and the result. The Nevada Supreme Court
6 further enumerated the *Brunzell* factors in *Schouweiler v. Yancey Co.*, 101 Nev. 827, 712 P.2d 786
7 (1985). The four factors to be considered in determining the reasonableness of attorney's fees are:

- 8 (1) *the qualities of the advocate*: his or her ability, training,
education, experience, professional standing and skill;
- 9 (2) *the character of the work to be done*: its difficulty, its
intricacy, its importance, time and skill required, the
10 responsibility imposed and the prominence and character of
the parties where they affect the importance of the litigation;
- 11 (3) *the work actually performed by the lawyer*: the skill, time and
attention given to the work; and
- 12 (4) *the result*: whether the attorney was successful and what
benefits were derived.

13
14 *See id.*

15 With respect to the qualities of the advocate, Plaintiff does not dispute that both Ms. Erika
16 Pike Turner, Esq. and Mr. Dylan Ciciliano, Esq. of Garman Turner Gordon are qualified legal
17 advocates in terms of education background and experience, with each representing that they have
18 over ten years of litigation experience. This only underscores why it was unreasonable for both of
19 them to be so heavily involved in this case, especially with Ms. Pike Turner's hourly rate (as a partner)
20 being so high at \$550 per hour in 2021 (an increase from \$535 per hour last year), and Mr. Ciciliano's
21 hourly rate (as an associate) jumping dramatically from \$345 in 2020 to \$385 in 2021 without any
22 explanation. Respectfully, in light of the lack of any supporting documentation or citations to other
23 decisions affirming the reasonableness of Mr. Ciciliano's newly increased rate of \$385 per hour
24 (which is on par with partner-level rates), First 100 is requesting that any fees attributed to work
25 completed by Mr. Ciciliano be billed at \$345 per hour, not \$385 per hour.

26 Additionally, while First 100 does not dispute the competence of the work performed by
27 paralegals at Garman Turner Gordon, the \$215.00 hourly paralegal rate is egregious and not in line
28 with standard paralegal rates in this region with commensurate levels of experience. First 100 is

1 respectfully requesting that the paralegal rate be reduced to \$115 per hour.

2 With respect to the character of the work done, First 100 reminds the Court that these were
3 standard motions in a straightforward business matter (motion to compel, motion to enforce
4 settlement, and motion for an order to show cause) that resulted in a two day evidentiary hearing.
5 These are commonplace motions that are frequently litigated in business matters and should not have
6 required extensive research on the part of Plaintiff's attorneys.

7 With respect to the work actually performed, much of the work performed by Garman Turner
8 Gordon was excessive and overcharged. This should go without saying, as \$161,655.81 in attorneys'
9 fees, for less than four months of work, is obviously excessive and reeks of unnecessarily overworking
10 a case, especially when the end result was a simple two day evidentiary hearing.

11 Examples of the inappropriate and overbilling include but are not limited to:

- 12 • The inclusion of \$10,120.00 in fees that did not actually relate to work performed on
13 behalf of Plaintiff but that relate to work performed on behalf of non-party Matthew
14 Farkas. *See* Mot at Ex. 3. All of these fees should be excluded, as the Court never
15 awarded fees to non-party Matthew Farkas. Respectfully, Plaintiff's decision to retain
16 counsel on behalf of Mr. Farkas is not First 100's responsibility. The Court did not
17 award any fees to Mr. Farkas;
- 18 • The inclusion of \$3,825.50 for activities that have nothing to do with the motion to
19 compel, motion to enforce settlement agreement, or the motion for an order to show
20 cause. This includes fees associated with the first order granting fees/costs, drafting
21 writs of execution on the first judgment, finalizing "collection" documents, briefing
22 the first motion for fees and costs, and locating Mr. Bloom's address. Mot. at Ex. 1 at
23 pp. 24/26 – 26/26. None of these fees should be included in the fee award;
- 24 • The excessive amount of time spent on preparing the opposition to the motion to
25 enforce settlement agreement. Ms. Pike Turner and Mr. Ciciliano billed a combined
26 \$14,514.50 for this opposition brief, which is beyond excessive. Mot. at Ex. 1 at pp.
27 19/26 – 22/26. This amount should be reduced to \$3,500 to account for a more
28 reasonable amount of time spent on an opposition brief on a straightforward motion;

- The double-billing for work performed related to depositions. This includes the separate billings associated with two different attorneys preparing for the deposition of Matthew Farkas (the excessive \$500.50 billed by Mr. Ciciliano should be deducted from the fee award, *see* Mot. at Ex. 1 at p. 9/26). This also includes the excessive amount of time spent on the deposition of non-party Jay Bloom, which went nearly 7 hours. Ms. Pike Turner and Mr. Ciciliano billed 20.4 hours and \$10,807.50 on fees for the preparation and attendance of a *single* deposition. *See* Mot. at Ex. 1. This should be reduced to \$2,500. This also includes both Ms. Pike Turner and Mr. Ciciliano needlessly appearing for the deposition of non-party Raffi Nahabedian, which resulted in 11.6 hours and \$5,588 being billed just for attending that deposition. Mot. at Ex. 1 at p. 13/26. This amount should be reduced to \$2,500. Moreover, both Ms. Pike Turner and Mr. Ciciliano billed excessively just for preparing for Mr. Nahabedian's deposition, with the billing coming to \$5,423. Mot. at Ex. 1 at p. 14/26. This amount should be reduced to \$1,000 to account for the standard amount of time spent preparing for a non-party deposition, especially a non-party like Mr. Nahabedian who had little to no relevant information. This also includes the \$1,347.50 spent on "investigating" the dockets associated with Mr. Nahabedian, as such information had no relevance to this case. The Court should therefore deduct such fees from the fee award;
- The unnecessary billing for communicating with Joshua Gilmore, Esq. of Bailey Kennedy for purported "violations" of NRPC, none of which were actually found by the Court. As such, the \$231.00 charged for such communications on 2/12/2021 should be rejected by the Court. Mot. at Ex. 1 at p. 13/26. Similarly, the \$962.00 charged for such communications on 2/2/2021 should be rejected by the Court. Mot. at Ex. 1 at p. 16/26;
- The excessive billing related to attending the evidentiary hearing. Respectfully, there was no need for a paralegal of Garman Turner Gordon to attend the evidentiary hearing. The 7 hours billed by paralegal Michele Pori on 3/3/2021 for the first day of the evidentiary hearing, and the 6 hours billed by paralegal Michele Pori on 3/10/2020

1 for the second day of the evidentiary hearing, which accumulated to \$2,795, should be
2 deducted from the Court’s fee award. Mot. at Ex. 1 at pp. 2/26 and 4/26;

- 3 • Additionally, the \$1,232.00 billed for a “motion to strike arguments with no admissible
4 evidence” should be disregarded by the Court, as no such motion was granted by the
5 Court. Mot. at Ex. 1 at p. 3/26;
- 6 • The excessive billing for preparation of the FFCL, which accumulated to 19.8 hours
7 and \$10,890 in billed fees. There should be no more than five (5) hours billed for
8 preparing FFCL for this straightforward case. Thus, it would be appropriate to account
9 for \$2,750 for this billing activity, not \$10,890;

10 These are just the most glaring examples of excessive billing, as common sense indicates that
11 over \$160,000 billed as attorneys’ fees for less than 4 months of work (that should have been spent
12 on 3 motions and a 2-day evidentiary hearing) is beyond excessive. Undersigned counsel is well
13 aware that this same Court has awarded far less in fees on cases that were in litigation for over four
14 years and resulted in an actual trial. *See, e.g. First 100, LLC v. Joel Just*, Case No. A-14-705993-B,
15 7/10/2020 Minute Order (Court awarding \$100,000 in fees on a 5-year litigation case).

16 It should therefore follow that significant reductions should be made to a fee request of
17 **\$161,655.81** for less than four months of work in order to reach a fair and reasonable fee award that
18 complies with all of the *Brunzell* factors.

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1 **III. CONCLUSION**

2 Based on the foregoing, First 100 and non-party Jay Bloom respectfully ask that the Court
3 reduce the fee award requested by Plaintiff to a more reasonable figure, keeping in mind that the only
4 actual attorney work that relates to this issue involves three motions and the work associated with one
5 2-day evidentiary hearing. By no means is \$161,655.81 considered “reasonable” for less than four
6 months of attorney work.

7 DATED this 19th day of April, 2021.

8 Respectfully submitted,

9 **MAIER GUTIERREZ & ASSOCIATES**

10 /s/ Joseph A. Gutierrez

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12 JOSEPH A. GUTIERREZ, ESQ.

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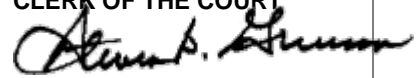
15 *Attorneys for First 100, LLC and 1st One*

16 *Hundred Holdings, LLC*

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DISTRICT COURT

CLARK COUNTY, NEVADA

TGC/FARKAS FUNDING, LLC,
Plaintiff,

vs.

FIRST 100, LLC, a Nevada Limited Liability
Company; FIRST ONE HUNDRED
HOLDINGS, LLC, a Nevada limited liability
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LLC, a Nevada Limited Liability Company
Defendants.

CASE NO. A-20-822273-C
DEPT. XIII

**REPLY TO DEFENDANTS' OPPOSITION
TO MOTION FOR ATTORNEYS' FEES
AND COSTS**

The opposition to the requested fees and costs filed by First 100, LLC, 1st One Hundred Holdings, LLC and Jay Bloom (collectively, the "Judgment Debtors") on April 19, 2021 (the "Opposition") is primarily based on demonstrably false statements, as well as stubborn disregard for Judgment Debtors' role in increasing the fees incurred in the litigation. In reply, Plaintiff/Judgment Creditor TGC/Farkas Funding, LLC ("Plaintiff") submits the following Memorandum of Points and Authorities and Supplemental Declaration of Erika Pike Turner, Esq. in Support of Award of Fees and Costs attached hereto as **Exhibit 1** ("Supp Turner Dec").

MEMORANDUM OF POINTS AND AUTHORITIES

A. Judgment Debtors Concede the Costs Were Necessarily Incurred.

The Opposition concedes that the costs totaling **\$4,816.81** were necessarily incurred. (Opposition, 2:1-2). Accordingly, they can be summarily awarded.

...

1 **B. The Brunzell Factors Have Been Met, Justifying the Requested Fees Be**
2 **Awarded.**

3 The factors to be considered in determining the reasonableness of attorneys' fees are 1) the
4 qualities of the advocate (ability, training, education, experience, professional standing and skill),
5 2) the character or nature of the work (difficulty, intricacy and importance of the work to be
6 performed, as well as the time and skill required, the responsibility imposed and the prominence
7 and character of the parties where they affect the importance of the litigation), 3) the work
8 performed by the lawyer (skill, time and attention given to the work); and 4) the result achieved
9 (whether the attorney was successful and benefits derived). *Brunzell v. Golden Gate Nat'l Bank*,
10 95 Nev. 345, 349, 455 P.2d 31, 33 (1969). Each of these factors was supported by the Declaration
11 of Erika Pike Turner, Esq. In Support of Award of Attorneys' Fees and Costs (the "Turner Dec").
12 To supplement the record in response to the Opposition, Plaintiff respectfully request the Court
13 also consider the following:

14 **1. Qualities of the Advocate**

15 The Opposition fails to provide *any* evidence to rebut the Turner Dec. Inclusive, while
16 Judgment Debtors make conclusory arguments that counsel's hourly rates are high, they fail to
17 demonstrate how the rates are not reasonable in this market given the qualities of identified counsel
18 for Plaintiff. As explained in Paragraphs 8-9 of the Turner Dec, the rates charged by counsel are
19 commensurate with those charged by other attorneys with similar qualities, including those with
20 commensurate experience in this business court. For the avoidance of doubt, the Supp Turner Dec
21 provides additional detail, including:

22 Erika Pike Turner, Esq.- Practicing for over 23 years, as licensed in Nevada as an attorney
23 since 1997. Experience includes appointment as a special hearing master in complex litigation,
24 including the Southern Nevada Coordinated Breast Implant Litigation and Venetian Lien
25 Litigation, associate attorney (April 1999-December 2004) and then an equity partner (December
26 2004-May 2015) in the commercial litigation department of the law firm of Gordon Silver and
27 founder and partner of the law firm of Garman **Turner** Gordon, LLP ("GTG") (May 2015-
28 present). Experience includes hundreds of cases, almost exclusively in commercial litigation, in

1 the business courts of Washoe and Clark County, Nevada, the federal and bankruptcy courts
2 located in Nevada, various federal and bankruptcy courts located in other states, including
3 Delaware and California, as well as ARMADR, JAMS and AAA arbitration. Education:
4 University of Nevada, B.A. (1994) and American University, J.D. (1997). Peer-rated “AV” by
5 Martindale Hubbell®, “Top Rated Lawyer in Business Litigation” by Super Lawyer® (2012-
6 2021). (Supp Turner Dec, ¶¶ 6-7).

7 Dylan Ciciliano, Esq.- Practicing for approximately 10 years, as licensed in Nevada as an
8 attorney since 2011. Education: University of Nevada, B.A. (2007) and Masters of Economics
9 (2008), and University of Arizona, J.D. (2011). Experience includes an associate in the
10 commercial litigation department of the law firm of Gordon Silver (May 2015) and an attorney at
11 GTG (May 2015- present). Experience almost exclusively in commercial litigation, in the business
12 court of Clark County, Nevada, as well as the federal and bankruptcy courts located in Nevada and
13 other states, as well as arbitration. “Top Rated Lawyer in Business Litigation-Rising Star” by
14 Super Lawyer® (2014-2021). (Supp Turner Dec, ¶¶ 8-9).

15 Michele Pori, paralegal- A paralegal for approximately 10 years, as certificated in Nevada
16 as a paralegal since 2011. Experience includes paralegal at the law firm of Gordon Silver and with
17 GTG, including relevant trial experience. Prior to being a paralegal, Ms. Pori was Senior Vice
18 President of Saxton, Inc., a public company. She is without a doubt the best paralegal in Nevada,
19 and an essential part of the team to avoid the expenditure of attorney hours preparing exhibits for
20 the evidentiary hearing, interacting with Court staff regarding remote evidence protocols, and
21 assisting with the IT needs in the presentation of the remote evidence while counsel is questioning
22 witnesses. (Supp Turner Dec, ¶ 10).

23 Without evidence to refute the rates charged, at p. 3 of the Opposition, Judgment Debtors
24 make conclusory, unsupported arguments that the rates are high. The lack of evidence in support
25 of the Opposition is particularly conspicuous when considering that Judgment Debtors’ counsel
26 charges similar rates despite significantly less experience. As shown in **Exhibit 1-A** hereto,
27 counsel for Judgment Debtors were awarded fees and costs representing First 100, LLC in this
28

1 very court in May 2020,¹ which decision is particularly illustrative of the reasonableness of the
2 rates charged by GTG:

3 Joseph Gutierrez, Esq.-Mr. Gutierrez graduated from law school in 2004 (7 years after Ms.
4 Turner was licensed and started practicing law in Nevada). Mr. Gutierrez' legal rate was
5 \$495/hour in May 2020, despite 7 years less experience than Ms. Turner. (Exh. 1-A, p. 5). As
6 Mr. Gutierrez explained to the Court, his and his associate's rate "increased steadily and
7 appropriately as the years have passed. (*Id.* at 5:18-20, 25-26). Similarly, Ms. Turner's rate was
8 \$535/hour in 2020 and increased to \$550/hour effective January 1, 2021, representing a less than
9 3% increase (less than even an appropriate cost of living increase).

10 Mr. Gutierrez' associate appearing on the caption of the Opposition, Danielle Barazza,
11 Esq., graduated from law school in 2015, 4 years after Dylan Cicilano, Esq. started practicing law
12 in Nevada. Yet, in May 2020, Ms. Barazza's hourly rate was \$395/hour, \$10 more than Mr.
13 Ciciliano's hourly rate. (Exh. 1-A, p. 5). With almost half the experience and \$10 more/hour than
14 Mr. Ciciliano, this Court found the rate charged by Ms. Barazza was fair and reasonable. (Exh. 1-
15 A, Order Granting Fees in *First 100, LLC v. Just*). Mr. Ciciliano's rate of \$385/hour is more than
16 reasonable under the circumstances. As explained in the Supp Turner Dec (¶ 9), it was recognized
17 that GTG was grossly undercharging for Mr. Ciciliano's services until this year that represents his
18 10th year in practice. It appears that GTG is still under-charging given Ms. Barazza's going rate.

19 Judgment Debtors present zero evidence to support a reduction of Ms. Pori's rate to
20 \$115.00 as requested in the Opposition (3:1). As explained in the Supp Turner Dec (¶ 10), Ms.
21 Pori's rate is commensurate with her significant experience in commercial litigation, including her
22 particularly relevant trial experience. And again, Mr. Gutierrez' own paralegal that certainly lacks
23 the same degree of experience as Mr. Pori charged \$150.00/hour in May 2020 and was deemed by
24 this Court to be reasonable.

25 As explained by Mr. Gutierrez himself in the *First 100, LLC v. Just* matter (Exhibit 1-A,
26 p. 5), rates are not static, and they increase with experience. As demonstrated in the Turner Dec,

27 _____
28 ¹ As set forth in the Supp Turner Dec at ¶ 5, it was requested on April 14, 2021 that Maier Gutierrez
& Associates provide updated information, which request was ignored.

1 and further in the Supp Turner Dec, the team representing Plaintiff charges rates commensurate
2 with their experience and consistent with the local commercial law market. Part of the value of
3 having a team with multiple levels of experience is to avoid charging the highest rate as much as
4 practicable without sacrificing quality of representation, which results in a blended rate
5 significantly lower than the highest rate charged. By way of exemplar, relative to the time
6 expended in connection with the OSC, the Motion to Enforce and the Motion to Compel between
7 January 1, 2021 and March 31, 2021, there were 311 total hours expended: 192.7 by Ms. Turner,
8 93.2 by Mr. Ciciliano and 25.1 by Ms. Pori, which results in a blended rate of \$463.45, significantly
9 less than the \$550/00 hour that is charged by Ms. Turner.

10 Judgment Debtors do not criticize the rate charged by Ken Hogan, but rather provide a
11 blanket objection to his invoices because Mr. Hogan did not represent Plaintiff. As explained in
12 the Turner Dec (§ 5), **Plaintiff** is required to indemnify Matthew Farkas in the present matter in
13 his capacity as former Administrative Member and member of Plaintiff pursuant to the terms of
14 the Operating agreement and pay the fees and costs incurred by Mr. Farkas at his deposition, at
15 the evidentiary hearing and otherwise in connection with the Motion to Enforce (and by extension,
16 the OSC). Therefore, the fees incurred with Mr. Hogan were fees incurred, and to be paid, by
17 Plaintiff.

18 **2. The Nature of the Work and Work Actually Performed.**

19 Contrary to the conclusory arguments of the Opposition (4:2-6), the nature of the work at
20 issue was not standard or straightforward. It was complex, mostly on an expedited basis, and
21 required extensive research, particularly with respect to Bloom's conduct and remedies therefore.
22 This work required to be performed was necessary **solely** as a result of the wrongful conduct of
23 Judgment Debtors who are doing everything possible to avoid turning over documents and records
24 relating to their investment. There were multiple hearings, depositions, briefs, and ultimately a
25 two-day evidentiary hearing included in the work necessarily performed that would have been
26 avoided if only Bloom had performed as ordered in November 2020. As recognized in this Court's
27 order finding contempt against the Judgment Debtors, the remedy of an award of attorneys' fees
28 necessarily incurred to address Judgment Debtors' contempt is statutory, as necessary to place the

1 harmed party back in the position that they were in prior to the contempt.

2 Judgment Creditors lack all credibility in criticizing the amount expended on responding
3 to their non-compliance with the Court's Order, including their baseless Motion to Enforce and
4 privilege objection over communications between opposing parties that required a Motion to
5 Compel be prepared and filed on an order shortening time. A list of work to be performed (as
6 evidenced by the Turner Dec, attached GTG Fee Transaction History, and the Supp Turner Dec,
7 and a review of the docket in this case) included:

- 8 1) The Order to Show Cause Why Defendants and Jay Bloom Should Not Be Found in
9 Contempt ("OSC") required extensive briefing, inclusive of a "Supplement to OSC" to
10 address the escalated wrongful conduct since the original OSC was filed.
- 11 2) Judgment Debtors substantially increased the amount of time necessarily expended in
12 the case with their wrongful Motion to Enforce Settlement Agreement ("Motion to
13 Enforce") and related opposition to the OSC. Plaintiff was required to investigate the
14 Motion to Enforce allegations and research and draft an Opposition to the Motion to
15 Enforce in an expedited timeframe as a result of the Motion being set at Judgment
16 Debtors' request on an order shortening time.
- 17 3) Related to both the OSC and the Motion to Enforce:
 - 18 a. Counsel prepared and argued at two non-evidentiary hearings on the OSC and
19 Motion to Enforce (1/21/21, 1/28/21),
 - 20 b. Counsel prepared for and deposed Jay Bloom, Raffi Nahabedian and Matthew
21 Farkas,
 - 22 c. Counsel prepared for and defended the deposition of Adam Flatto,
 - 23 d. Counsel met and conferred with counsel for Raffi Nahabedian and for Judgment
24 Debtors and when they would not provide non-privileged communications
25 necessarily filed the Motion to Compel,²

26
27 ² It is well known Bailey Kennedy has particular expertise on professional ethics and malpractice.
28 As indicated in the billing entries, Josh Gilmore, Esq. assisted in the analysis of the issues
identified in the Motion to Compel, inclusive of the wrongful claim of privilege by Bloom for
communications involving opposing parties.

- e. Counsel prepared for and argued at the hearing on the Motion to Compel,
- f. Counsel prepared the Order granting the Motion to Compel and communicated back and forth with counsel for Judgment Debtors and Raffi Nahabedian regarding the order,
- g. Counsel investigated dockets and otherwise marshalled evidence presented at the evidentiary hearing;
- h. Counsel submitted a pre-hearing brief,
- i. prepared a motion to strike to address multiple “witness” declarations proposed as hearing exhibits by Judgment Debtors,
- j. prepared for cross-examination of multiple declarants, who were never called by Judgment Debtors but there had to be preparation by Mr. Ciciliano in the event they were called;
- k. prepared for and attended a two-day evidentiary hearing, and
- l. researched and prepared extensive proposed findings and conclusions of law with citations to the record, which were substantially adopted by the court.

As explained in Paragraph 11 of the Turner Dec, there was voluntary no-charging of over \$3,400.00 to avoid double-billing to Plaintiff. The tasks performed by the different members of the litigation team were different. For instance, Ms. Turner was responsible for examination of Bloom, and Mr. Ciciliano was responsible for examination of the declarants who provided declarations should they be called to testify. The fact that Judgment Debtors did not call the declarants to testify does not render the preparation for their examination unreasonable. Preparation was necessary in anticipation of the witnesses being called.

Judgment Debtors make the demonstrably false statement that Plaintiff is seeking attorneys’ fees that include matters beyond the OSC, Motion to Compel and Motion to Enforce. (Opposition, 4:18-23). As explained in Paragraph 11 of the Turner Dec, Exhibit 1 thereto evidences billing entries from **January 1, 2021** through March 31, 2021 (the “GTG Fees Transaction History”). While preceding dates are included in the GTG Fees Transaction History, the entries were not actually included in the calculation of fees to be awarded. Only fees incurred

1 “related to the OSC, Motion to Compel and Motion to Enforce” are requested to be awarded,
2 consistent with the Court’s Findings of Fact, Conclusions of Law, and Judgment entered following
3 the evidentiary hearing. In fact, not one transaction on pages 24-26 of the GTG Fees Transaction
4 History are included in the calculation of the fees requested- not one. The **\$144,134.00** in total
5 fees incurred by Plaintiff with GTG through March 31, 2021 identified in Paragraph 11 of the
6 Turner Dec (3:22) excludes those entries described on pages 24-26 of the GTG Fees Transaction
7 History. For the avoidance of doubt, \$144,134.00 is the total fees incurred by Plaintiff with GTG
8 relating to the OSC, Motion to Compel and Motion to Enforce from January 1, 2021 through March
9 31, 2021, and does not include additional tasks.

10 In sum, the amount of work to be done on the OSC, Motion to Enforce and Motion to
11 Compel was voluminous, the subject matter was unique and required investigation, research,
12 analysis and extensive fact and law briefing to the Court in addition to the presentation of live
13 testimony over two days’ time. The character of the work and actual work performed justified the
14 fees incurred.

15 **3. The Result.**

16 The Opposition ignores the “result” factor, as it must. Plaintiff prevailed on the OSC, the
17 Motion to Enforce and the Motion to Compel. To have compromised on the expenditure of time
18 on the briefs and presentation of evidence as suggested by Judgment Debtors is not justified when
19 considering that the work performed resulted in Plaintiff prevailing on each and every one of the
20 motions at bar, whether filed by Plaintiff or Judgment Debtors.

21 **C. ADDITIONAL FEES HAVE BEEN NECESSARILY INCURRED.**

22 Judgment Debtors’ spurious opposition that utterly disregards that their contempt of this
23 Court’s orders is what has driven up the cost of this litigation has further driven up the fees
24 necessarily incurred by Plaintiff. Reviewing the Opposition and preparing the Reply and
25 supplemental declaration has resulted in the additional expenditure of 6.5 hours- **\$3,575.00**. (Supp
26 Turner Dec, ¶ 12).

27 **D. CONCLUSION**

28 All the fees and costs could have been avoided if Judgment Debtors had just complied with

1 their Court-ordered obligations and avoided the shenanigans that had to be addressed through
2 extensive Court proceedings. As a result of the contempt of Judgment Debtors and corresponding
3 Motion to Enforce and Motion to Compel that had to be resolved as part of the contempt
4 proceeding, the fees and costs incurred by Plaintiff were reasonable and justified.

5 Based upon the foregoing, Plaintiff respectfully requests that the Court award Plaintiff an
6 award of attorneys' fees and costs in the total amount of **\$165, 230.81**, consisting of:

7 \$4,816.81 in costs incurred from November 18, 2020 through March 31, 2021 related to
8 the OSC, Motion to Compel and Motion to Enforce (Turner Dec, ¶ 12);

9 \$146,719.00 in fees incurred with GTG from January 1, 2021 through April 9, 2021
10 (Turner Dec, ¶ 11);

11 \$10,120.00 in fees incurred with Kenneth Hogan, Esq. through the indemnification of
12 Matthew Farkas (former Administrative Member and Member of Plaintiff) at deposition and the
13 evidentiary hearing (Turner Dec, ¶ 13); and

14 \$3,575.00 in fees for this Reply (Supp Turner Dec, ¶ 12).

15 DATED this 23rd day of April, 2021.

16 GARMAN TURNER GORDON LLP

17
18 /s/ Erika Pike Turner
19 ERIKA PIKE TURNER
20 Nevada Bar No. 6454
21 DYLAN T. CICILIANO
22 Nevada Bar. No. 12348
23 7251 Amigo Street, Suite 210
24 Tel: (725) 777-3000
25 Fax: (725) 777-3112
26 *Attorneys for Plaintiff*
27
28

CERTIFICATE OF SERVICE

The undersigned, hereby certifies that on the 23rd day of April, 2021, he served a copy of the **REPLY TO DEFENDANTS' OPPOSITION TO MOTION FOR ATTORNEYS' FEES AND COSTS**, by electronic service in accordance with Administrative Order 14.2, to all interested parties, through the Court's Odyssey E-File & Serve system addressed to:

Joseph A. Gutierrez, Esq.
Danielle J. Barraza, Esq.
MAIER GUTIERREZ & ASSOCIATES
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Email: jag@mgalaw.com
djb@mgalaw.com
Attorneys for Defendants

Bart K. Larsen, Esq.
SHEA LARSEN
1731 Village Center Circle, Suite 150
Las Vegas, NV 89134
Email: blarsen@shea.law
Attorneys for Raffi Nahabedian

I further certify that I served a copy of this document by emailing it and mailing a true and correct copy thereof via U.S Regular Mail, postage prepaid, addressed to:

Kenneth E. Hogan, Esq.
HOGAN HULET PLLC
1140 N. Town Center Dr., Suite 300
Las Vegas, NV 89144
Email: ken@h2legal.com
Attorneys for Matthew Farkas

/s/ Max Erwin

An Employee of
GARMAN TURNER GORDON LLP

Exhibit 1

SUPP

GARMAN TURNER GORDON LLP
ERIKA PIKE TURNER
Nevada Bar No. 6454
Email: eturner@gtg.legal
DYLAN T. CICILIANO
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Tel: (725) 777-3000
Fax: (725) 777-3112
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

TGC/FARKAS FUNDING, LLC,
Plaintiff,

vs.

FIRST 100, LLC, a Nevada Limited Liability
Company; FIRST ONE HUNDRED
HOLDINGS, LLC, a Nevada limited liability
company aka 1st ONE HUNDRED HOLDINGS
LLC, a Nevada Limited Liability Company,
Defendants.

CASE NO. A-20-822273-C
DEPT. 13

**SUPPLEMENTAL DECLARATION OF
ERIKA PIKE TURNER, ESQ. IN
SUPPORT OF AWARD OF FEES AND
COSTS**

I, Erika Pike Turner, declare as follows:

1. I am over the age of eighteen (18) years and competent to testify on the matters set forth herein.

2. I am a founding partner of the law firm Garman Turner Gordon LLP (“GTG”), counsel of record for Plaintiff in the above-captioned case. In such capacity, I have developed personal knowledge regarding the facts set forth below.

3. I make this Supplemental Declaration in support of the award of fees and costs expended relating to the Order to Show Cause Why Defendants and Jay Bloom Should Not Be Found in Contempt (the “OSC”), Plaintiff’s Motion to Compel, and Defendants’ Motion to Enforce Settlement Agreement (“Motion to Enforce”).

4. Attached hereto as **Exhibit 1-A** is the May 15, 2020 Motion for Attorneys’ Fees

1 filed by the law firm of Maier Gutierrez & Associates, counsel for First 100, LLC in the case of
2 *First 100, LLC, et al. v. Joel Just, et al.*, together with the July 27, 2020 Order entered by this court
3 granting the Motion for Attorneys' Fees.

4 5. Attached hereto as **Exhibit 1-B** is the April 11, 2021 correspondence from the law
5 firm of Maier Gutierrez & Associates. I promptly responded to the missive on April 14, 2021 with
6 a request for the bills incurred by Maier Gutierrez & Associates purportedly totaling \$98,788.00
7 in the subject case to determine the rates and work actually performed. The request was ignored.
8 Of particular note, Maier Gutierrez & Associates did not have to prepare for the deposition of Raffi
9 Nahabedian, as no questions were posed at the deposition by Maier Gutierrez & Associates. In
10 addition, comparing the amount of work filed with the Court by Maier Gutierrez & Associates
11 demonstrates a marked difference with that filed by GTG. Just looking at the briefs filed with the
12 Court, GTG provided much more extensive briefing in connection with the OSC, the Opposition
13 to the Motion to Enforce, pre-evidentiary hearing briefing, the Motion to Compel, as well as the
14 proposed findings of fact and conclusions of law.

15 6. Attached hereto as **Exhibit 1-C** is my biography. As a supplement, I was appointed
16 special master of the Coordinated Breast Implant Litigation by the Honorable James A. Brennan
17 in 1997 after I passed the bar in Nevada, as well as served as his law clerk. Thereafter, I was hired
18 as an associate at Gordon Silver and was in that role from April 1998 through December 2004. I
19 was promoted to equity partner in December 2004 and was in that role until I left Gordon Silver
20 to form Garman Turner Gordon, LLP in May 2015. I have been lead counsel on hundreds of
21 cases. I am in Odyssey under my maiden name, Erika A. Pike, as well as Erika Pike Turner, and
22 a search of "Erika Pike" and "Erika Turner" in Clark County alone returned over 200 cases, most
23 of which were in business court. I have also been lead counsel in numerous cases in Washoe
24 County business court and the federal and bankruptcy courts located in the State of Nevada,
25 Delaware, and California.

26 7. My partner, Gregory Garman, Esq., has the same amount of experience and has an
27 hourly rate of over \$700/hour. My partner, Gerald Gordon, Esq., has more experience and charges
28 over \$800/hour. My rate of \$550 is commensurate with that charged by other counsel who practice

1 in business court. As is the practice of GTG, we surveyed our colleagues prior to fixing rates for
2 2021. Attorneys with at least 20 years of experience communicated they charge between \$495
3 and \$725/hour. Of note, the increase in my rate from 2020 to 2021 from \$535/hour to \$550/hour
4 represents an approximate 3% increase that is commensurate with the nationally recognized annual
5 3% cost of living increase.

6 8. Attached hereto as **Exhibit 1-D** is the biography of Dylan Ciciliano. He has been
7 practicing for approximately 10 years, as licensed in Nevada as an attorney since 2011. Education:
8 University of Nevada, B.A. (2007) and Masters of Economics (2008), and University of Arizona,
9 J.D. (2011). Experience includes an associate in the commercial litigation department of the law
10 firm of Gordon Silver (May 2015) and an attorney at GTG (May 2015- present). Experience
11 almost exclusively in commercial litigation, in the business court of Clark County, Nevada, as well
12 as the federal and bankruptcy courts located in Nevada and other states, as well as arbitration. As
13 an exemplar of the quality of the work performed by Mr. Ciciliano, he is currently leading the
14 highly publicized litigation in the bankruptcy of the National Rifle Association in Texas, which
15 has included a three-week long evidentiary hearing that is still going, requiring quality counsel.
16 He has been peer-reviewed “Top Rated Lawyer in Business Litigation-Rising Star” by Super
17 Lawyer® (2014-2021).

18 9. GTG was grossly undercharging for Mr. Ciciliano’s time in prior years. His rate
19 was corrected effective January 1, 2021 to come more into line with other attorneys with similar
20 experience and skill. He is now a 10-year attorney. It appears from looking at Danielle Barazza’s
21 rate that Mr. Ciciliano’s current rate of \$385 may still be below-market.

22 10. Mr. Ciciliano does not perform the same tasks as Ms. Turner. For instance, Mr.
23 Ciciliano researches and conducts analysis for use in briefs, marshals evidence for depositions and
24 hearing, while Ms. Turner prepares the examination of witnesses.

25 11. Michele Pori, paralegal- A paralegal for approximately 10 years, as certificated in
26 Nevada as a paralegal since 2011. Experience includes paralegal at the law firm of Gordon Silver
27 and with GTG. Prior to being a paralegal, Ms. Pori was Senior Vice President of Saxton, Inc., a
28 public company. She is without a doubt the best paralegal in Nevada, and an essential part of my

1 team to avoid the expenditure of attorney hours preparing exhibits for the evidentiary hearing,
2 interacting with Court staff regarding remote evidence protocols, and assisting with the IT needs
3 in the presentation of the remote evidence while counsel is questioning witnesses. She has assisted
4 me and other attorneys at GTG with jury trials, bench trials, evidentiary hearings and arbitration,
5 helping to prepare the evidence and present it to the factfinder and witness without the significant
6 delay or interruption that I have seen when counsel does not have assistance.

7 12. Reviewing the Opposition and preparing the Reply and this supplemental
8 declaration has resulted the additional expenditure of 6.5 hours- **\$3,575.00**. In addition, there is
9 an additional **\$3.50** in filing fees for the filing of the Reply.

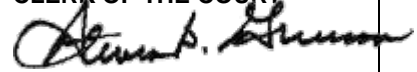
10 I declare under penalty of perjury under the law of the State of Nevada that the foregoing
11 is true and correct.

12 Executed this 23rd of April, 2021.

13 /s/ Erika Pike Turner

14 ERIKA PIKE TURNER, Declarant
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28

Exhibit 1-A



MOT

JOSEPH A. GUTIERREZ, ESQ.

Nevada Bar No. 9046

DANIELLE J. BARRAZA, ESQ.

Nevada Bar No. 13822

MAIER GUTIERREZ & ASSOCIATES

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*Attorneys for Plaintiffs First 100, LLC and
1st One Hundred Holdings, LLC*

DISTRICT COURT

CLARK COUNTY, NEVADA

FIRST 100, LLC, a Nevada limited liability
company; 1st ONE HUNDRED HOLDINGS,
LLC, a Nevada limited liability company,

Plaintiffs,

vs.

JOEL JUST, an individual; EAGLE ROCK
ASSET MANAGEMENT, LLC, a Foreign
Limited Liability Company; KREGG HALE, an
individual; XRIVER PROPERTIES, LLC, a
Foreign Limited Liability Company; DOES I
through X; and ROE ENTITIES I through X,
inclusive,

Defendants.

Case No.: A-14-705993-B

Dept. No.: XIII

**PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
INTEREST**

[HEARING REQUESTED]

Prevailing Plaintiffs/Counterclaimants FIRST 100, LLC ("First 100") and 1st ONE
HUNDRED HOLDINGS, LLC ("Holdings") (collectively "Plaintiffs"), by and through their
attorneys of record, MAIER GUTIERREZ & ASSOCIATES, hereby submit their motion for attorneys' fees,
costs, and interest.

This motion is made and based upon the following memorandum of points and authorities, the

papers and pleadings on file, the Declaration of Joseph A. Gutierrez, Esq. (“Gutierrez Declaration”), and any oral argument the court may entertain at the hearing on this matter.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

This matter involved defendants Just and Eagle Rock Asset Management, LLC stealing confidential and proprietary information from Plaintiffs and using it to form the competing company, Eagle Rock Asset Management, LLC.

Following a bench trial, in its Findings of Fact, Conclusions of Law, and Judgment, this Court concluded that Just breached his fiduciary duties by actively seeking to damage First 100’s business relationships. *See* FFCL, *on file*. The Court also found that defendants Just and Eagle Rock Asset Management, LLC misappropriated First 100’s trade secrets and conspired with First 100 member and CEO Kregg Hale, with Hale feeding Just information about First 100. *Id.* at pp. 13-14. Further, the Court found that defendants Just and Eagle Rock Asset management intentionally interfered with Plaintiffs’ contractual relations with the Viera Condominium Association. *Id.* at pp. 14-15. The Court found that the interference with the Viera Condo Association prospective deal led to damages amounting to \$420,000. *Id.* at p. 16. Finally, the Court granted judgment in favor of First 100 as to Just’s counterclaims, as Just “did not provide sufficient evidence” supporting any of his counterclaims. *Id.* at pp. 16-17. Judgment was therefore entered in favor of Plaintiffs and against defendants Just and Eagle Rock Asset management in the amount of \$420,000.00. *Id.* at p. 17.

Importantly, the Court concluded that “*pursuant to Sections 13.9 and 13.10 of the 1st One Hundred Operating Agreement (Trial Exhibit 1), Plaintiffs are entitled to fees and costs, with the amount to be determined in post-trial motion practice with Plaintiffs’ supporting documentation.*” *Id.* at p. 16 (emphasis added). Thus, the purpose of this motion is solely to prove up the actual amount of attorneys’ fees and costs owed to Plaintiffs, pursuant to the Court’s request for post-motion briefing with supporting documentation.

In addition to the contractual basis for fees and costs that this Court has already found, Plaintiffs are also entitled to fees and costs pursuant to NRS 18.010(2)(b), NRS 18.005, and NRS 18.020. Specifically, defendants Just and Eagle Rock Asset Management, LLC continued with their

1 defense of the claims and with pursuing their own meritless counterclaims without any reasonable
2 ground and to harass the Plaintiffs. *See* NRS 18.010(2)(b).

3 Thus, Plaintiffs are respectfully seeking an award of attorneys' fees, costs, and prejudgment
4 interest, in the amounts set forth below and justified herein.

5 **II. LEGAL ARGUMENT**

6 While the decision whether to award attorneys' fees is within the sound discretion of the Court,
7 Nevada follows "the American rule that attorney fees may not be awarded absent a statute, rule,
8 or contract authorizing such award." *Thomas v. City of N. Las Vegas*, 122 Nev. 82, 90, 127 P.3d 1057,
9 1063 (2006).

10 Parties are free to provide for attorney fees by express contractual provisions. *See Musso v.*
11 *Binick*, 104 Nev. 613, 614, 764 P.2d 477, 477 (1988). The objective in interpreting
12 an attorney fees provision, as with all contracts, "is to discern the intent of
13 the contracting parties." *Cline v. Rocky Mountain, Inc.*, 998 P.2d 946, 949 (Wyo.2000). "[T]raditional
14 rules of contract interpretation [are employed] to accomplish that result." *Id.* Therefore, the initial
15 focus is on whether the language of the contract is clear and unambiguous; if it is, the contract will be
16 enforced as written. *Ellison v. C.S.A.A.*, 106 Nev. 601, 603, 797 P.2d 975, 977 (1990).

17 Here, the Court has already found that pursuant to the terms of the 1st One Hundred Operating
18 Agreement (Trial Exhibit 1), Plaintiffs are entitled to fees and costs, so there is no issue that Plaintiffs
19 are entitled to all reasonable attorneys' fees that are incurred through seeing this matter through
20 litigation, trial, and a judgment. *See* FFCL at p. 16, *on file*.

21 Even if that weren't the case, Plaintiffs would still be entitled to fees and costs because
22 defendants Just and Eagle Rock Asset Management, LLC pursued their defense and their
23 counterclaims with no reasonable basis for doing so, and only to harass Plaintiffs. Shortly after
24 initiating litigation, Plaintiffs filed for a temporary restraining order and preliminary injunction. On
25 December 19, 2014, the Court issued an order granting Plaintiffs' motion for preliminary injunction,
26 which granted Plaintiffs' request in for injunctive relief by:

- 27 • precluding Defendants from engaging in any transaction when the basis of the
28 transaction is based on Plaintiffs' business model, or any other information protected

1 under 3.1 confidentiality clause in the Operating Agreement;

- 2 • precluding Defendants from revealing or disclosing the Plaintiffs' contract for
- 3 purchase of account receivables on deeds relating to HOA liens, client financial
- 4 information, and client business models;
- 5 • precluding Defendants from revealing or disclosing any of Plaintiffs' non-public
- 6 information which includes Plaintiffs' business model, legal research, and conclusions
- 7 based on Plaintiffs' business model, operating practices and policies, purchase and sale
- 8 agreements relating to HOA liens or foreclosures, and the First 100 confidential
- 9 information packet;
- 10 • precluding Defendants from soliciting, obtaining, or using confidential information
- 11 that may be provided by Plaintiffs' employees and as to information that is protected
- 12 under Section 3.14 of the Operating Agreement; and
- 13 • precluding defendants from visiting Plaintiffs' office space.

14 Thus, in partially granting the request for injunctive relief, *the Court – very early in this*

15 *litigation – found there was a likelihood of success on the merits of Plaintiffs' claims* and a

16 reasonable probability that Defendants' conduct, if allowed to continue, would cause irreparable harm

17 for which a compensatory damage is an inadequate remedy. *Univ. & Cmty. Coll. Sys. of Nev. v.*

18 *Nevadans for Sound Gov't*, 120 Nev. 712, 721, 100 P.3d 179, 187 (2004).

19 Nevertheless, defendants Just and Eagle Rock Asset Management, LLC continued prolonging

20 this litigation and rebuffed numerous settlement overtures. See **Exhibit 1**, Gutierrez Declaration.

21 Pursuant to NRCP 54(d)(2)(B), a motion for attorneys' fees must be filed no later than 21 days

22 after written notice of entry of the judgment is served. Notice of entry of the Court's judgment was

23 filed and served on April 24, 2020. Therefore, this motion for fees is timely.

24 **A. ATTORNEYS' FEES**

25 In order for Plaintiffs to receive attorneys' fees, the factors set forth in *Brunzell v. Golden Gate*

26 *National Bank*, 85 Nev. 345, 455 P.2d 31 (1969) must be considered:

- 27 (1) *The qualities of the advocate*: his ability, his training, education, experience,
- 28 professional standing and skill;

1 (2) ***The character of the work to be done:*** its difficulty, its intricacy, its importance, time
2 and skill required, the responsibility imposed and the prominence and character of the
3 parties where they affect the importance of the litigation;

4 (3) ***The work actually performed by the lawyer:*** the skill, time and attention given to the
5 work; and

6 (4) ***The result:*** whether the attorney was successful and what benefits were derived. *Id.*
7 Here, all four of the *Brunzell* factors are satisfied:

8 First, Plaintiffs were represented by attorneys from the law firm MAIER GUTIERREZ &
9 ASSOCIATES, which has been representing plaintiffs in civil cases since August 2011. Prior to opening
10 MAIER GUTIERREZ & ASSOCIATES, the firm's partners previously worked for law firms such as
11 GREENBERG TRAURIG and BECKLEY SINGLETON, among others. These firms are well known in the
12 Las Vegas legal community with a reputation for experienced and professional attorneys.

13 Joseph A. Gutierrez, Esq. was the attorney primarily responsible for handling this matter on
14 behalf of Plaintiffs. Mr. Gutierrez received a law degree from Pepperdine University School of Law
15 in 2004. Following graduation and admission to the Nevada Bar, Mr. Gutierrez began his career at a
16 small Las Vegas litigation firm. Prior to founding MAIER GUTIERREZ & ASSOCIATES, Mr. Gutierrez
17 served as a litigator with Nevada's oldest incorporated law firm, BECKLEY SINGLETON, and then at
18 the international law firm, GREENBERG TRAURIG. Mr. Gutierrez's current hourly rate is \$495 per hour.
19 His hourly rate for this matter began at \$295 per hour (back in 2014), and has increased steadily and
20 appropriately as the years have passed. Ex.1.

21 Danielle J. Barraza, Esq. is an associate at MAIER GUTIERREZ & ASSOCIATES who worked on
22 this matter and who actively participated as trial counsel with Mr. Gutierrez. Ms. Barraza received a
23 law degree from the William S. Boyd School of Law in 2015 and has been practicing law since
24 becoming admitted to the Nevada Bar in October 2015. Ms. Barraza originally worked on this matter
25 in her capacity as a law clerk, and her law clerk rate was \$195 per hour. Ms. Barraza's hourly rate
26 thereafter increased at various appropriate intervals and is now \$395 per hour. Ex. 1.

27 Margaret E. Schmidt, Esq. is a former associate at MAIER GUTIERREZ & ASSOCIATES. She
28 received a law degree from the William S. Boyd School of Law and has been a member of the Nevada

1 Bar since October 2011. Ashley Gordon Hanks, Esq. is also a former associate at MAIER GUTIERREZ
2 & ASSOCIATES. She received a law degree from American University and has been a member of the
3 Nevada Bar since May 2012. The hourly rate for both Ms. Schmidt and Ms. Gordon Hanks on this
4 matter was \$245 per hour. Ex. 1.

5 The above-referenced attorneys represent the attorneys who were specifically assigned to this
6 matter and who put significant work into this matter. Plaintiffs ask that the Court keep in mind that
7 this matter commenced in August of 2014, therefore it has been assigned to different attorneys as a
8 result of certain attorneys leaving Plaintiffs' counsel's law firm, as set forth in the Gutierrez
9 Declaration. Ex. 1. Additional assistance on this matter was obtained on an as-needed basis from
10 other attorneys at MAIER GUTIERREZ & ASSOCIATES and law clerks and paralegals, with their
11 credentials and hourly rates set forth in the Gutierrez Declaration. Ex. 1.

12 Second, this was a complex business matter involving 16 claims asserted against defendant
13 Just, 7 claims asserted against defendant Eagle Rock Asset Management, LLC, and 3 counterclaims
14 against plaintiff First 100. Preparation for the bench trial required considerable time, skill, and effort.
15 While the dismissal of defendant Just's counterclaims was inevitable based on the facts of this case
16 and the total lack of evidence defendant Just provided for those counterclaims, Plaintiffs had to engage
17 in significant discovery and motion practice in order to prove their claims against defendants Just and
18 Eagle Rock Asset Management, LLC.

19 Third, Plaintiffs' attorneys' skill, time and attention given to this case were commensurate with
20 the work required to take a case through an a bench trial. The preparation was thorough and complete.
21 In order to properly represent Plaintiffs, many hours of attorney work were required, including but not
22 limited to: briefing on a motion for TRO and preliminary injunction (which was granted to Plaintiffs);
23 briefing on a motion to amend the complaint (which was granted to Plaintiffs); briefing on keeping
24 this matter out of arbitration with respect to defendants Just and Eagle Rock Asset Management;
25 preparing and sending written discovery requests to defendants Just and Eagle Rock Asset
26 Management, LLC; deposing Joel Just, Kregg Hale, and David Swenson; preparing this matter for the
27 bench trial, which included witness preparation and exhibit preparation; and preparing closing briefs.
28 Considering the amount of time and effort exerted by Plaintiffs' counsel, the fees are clearly

1 substantiated. Plaintiffs' attorneys are a small firm, and the steps that needed to be taken to take this
2 matter through trial consumed much of the firm's time. The fees and rates charged for this case are
3 customary for representing clients in commercial and business litigation. The amount of attorneys'
4 fees requested is reasonable as compared to the issues and the amount in controversy and the results
5 obtained. Ex. 1.

6 Fourth, Plaintiffs incurred significant attorneys' fees related to successfully prevailing at the
7 bench trial, with the Court awarding Plaintiffs a judgment in the amount of \$420,000, and dismissing
8 Just's counterclaims. The work necessary to achieve a successful result was delegated to capable
9 attorneys based on experience in an attempt to minimize costs. Investigation, preparation, research,
10 drafting, and filing were performed at the lowest cost to Plaintiffs given other workload
11 considerations, and defendants Just and Eagle Rock Asset Management, LLC should now bear that
12 cost as a result of contractual obligations and defendants' unfounded insistence upon taking this matter
13 all the way through trial. This successful result, together with the other *Brunzell* factors, constitutes
14 compelling evidence to include Plaintiffs' fees as an additional judgment.

15 The total amount of attorneys' fees billed to Plaintiffs for professional services rendered in
16 this action through April 30, 2020 comes to \$155,563.50. See Ex. 1 and **Exhibit 2**, MGA Invoices¹
17 and cross-reference with the "PROFESSIONAL SERVICES RENDERED" amounts on each of the
18 MGA Fee Invoices.

19 Plaintiffs are also seeking an additional (and reasonably modest) \$2,500 for the post-trial
20 briefing on the attorneys' fees and costs, which includes having to provide briefing on Defendants'
21 motion to retax. Thus, Plaintiff are respectfully seeking \$158,063.50 in attorneys' fees, which is more
22 than reasonable, as set forth above, especially when considering that this matter has been in litigation
23 since August of 2014 and went through a bench trial.

24
25 ¹ It should be noted that this amount does not include the various interest charges reflected on the
26 attorney fee invoices. This amount accounts only for the actual professional services rendered over
27 the course of 5-plus years, which is why this amount is significantly lower than the total balances
28 reflected on the invoices. Although Plaintiffs are providing the Court with certain invoices which
reflect interest-only charges, as there were certain months that no professional work was done on this
matter, that is being done only to provide an understanding as to the total balance.

1 This Court should therefore award Plaintiffs \$158,063.50 for their outstanding attorneys' fees
2 that were incurred in prosecuting this action.

3 **B. COSTS**

4 NRS 18.005 governs the costs that are recoverable for a prevailing party. The rule states, in
5 part, that the following costs are recoverable:

- 6 1. Clerks' fees.
- 7 2. Reporters' fees for depositions, including a reporter's fee for one copy of each deposition.
- 8 3. Jurors' fees and expenses, together with reasonable compensation of an officer appointed
9 to act in accordance with NRS 16.120.
- 10 4. Fees for witnesses at trial, pretrial hearings and deposing witnesses, unless the court finds
11 that the witness was called at the instance of the prevailing party without reason or
12 necessity.
- 13 ...
- 14 7. The fee of any sheriff or licensed process server for the delivery or service of any
15 summons or subpoena used in the action, unless the court determines that the service was
16 not necessary.
- 17 8. Compensation for the official reporter or reporter pro tempore.
- 18 9. Reasonable costs for any bond or undertaking required as part of the action.
- 19 ...
- 20 11. Reasonable costs for telecopies.
- 21 12. Reasonable costs for photocopies.
- 22 ...
- 23 14. Reasonable costs for postage.
- 24 16. Fees charged pursuant to NRS 19.0335.
- 25 17. Any other reasonable and necessary expense incurred in connection with the action,
26 including reasonable and necessary expenses for computerized services for legal
27 research.

19 Additionally, NRS 18.020 states, in part, as follows:

20 **NRS 18.020 Cases in which costs allowed prevailing party.** Costs must be
21 allowed of course to the prevailing party against any adverse party against whom
22 judgment is rendered, in the following cases:

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

24 Here, costs should be awarded to Plaintiffs because they were seeking, and they were awarded
25 through judgment, an amount in excess of \$2,500.

26 Pursuant to NRS 18.110(1), the prevailing party claiming costs must serve and file a verified
27 memorandum of costs "within 5 days after the entry of judgment, or such further time as the court or
28 judge may grant," stating under oath that the cost items are correct and "have been necessarily incurred

1 in the action or proceeding.” *Sheehan & Sheehan v. Nelson Malley & Co.*, 117 P.3d 219 (Nev. 2005);
2 *Vill Builders 96 v. U.S. Labs*, 112 P.3d 1082 (Nev. 2005). See **Exhibit 3**, Verified Memorandum of
3 Costs and Disbursements.

4 Per the Verified Memorandum of Costs and Disbursements, all of the costs that Plaintiffs are
5 seeking reimbursement for are amounts allowable by NRS 18.005. All of these costs were necessary
6 to the successful litigation of this matter.

7 With respect to the \$7,500 bond amount, Plaintiffs included this in the Memorandum of Costs
8 pursuant to NRS 18.005(9). However, since then, defendants Just and Eagle Rock Asset Management,
9 LLC have stipulated to the bond being returned to Plaintiffs’ counsel. A stipulation and order has
10 been submitted to the Court for review. As such, assuming the Court grants that pending stipulation
11 and order, Plaintiffs are not seeking to also recover that same \$7,500 as a cost. See Ex. 1. Accordingly,
12 the new total for the costs, subtracting the \$7,500 bond amount, comes to **\$26,102.90**. Thus, Plaintiffs
13 are respectfully seeking an award of costs in the amount of **\$26,102.90**. See **Exhibit 4**, Revised
14 Prejudgment Interest Worksheet.

15 C. INTEREST

16 NRS 17.130 states as follows:

- 17 1. In all judgments and decrees, rendered by any court of justice, for any debt,
18 damages or costs, and in all executions issued thereon, the amount must be
19 computed, as near as may be, in dollars and cents, rejecting smaller fractions,
20 and no judgment, or other proceedings, may be considered erroneous for that
21 omission.
- 22 2. When no rate of interest is provided by contract or otherwise by law, or
23 specified in the judgment, the judgment draws interest from the time of service
24 of the summons and complaint until satisfied, except for any amount
25 representing future damages, which draws interest only from the time of the
26 entry of the judgment until satisfied, at a rate equal to the prime rate at the
27 largest bank in Nevada as ascertained by the Commissioner of Financial
28 Institutions on January 1 or July 1, as the case may be, immediately preceding
the date of judgment, plus 2 percent. The rate must be adjusted accordingly on
each January 1 and July 1 thereafter until the judgment is satisfied.

26 Plaintiffs have calculated the interest based on the Court’s initial judgment of \$420,000.00.
27 See Ex. 3 at Ex. 1 for Prejudgment Interest Sheet. The prejudgment interest on this initial judgment
28 totals **\$178,643.84**. *Id.*

1 The costs and disbursements incurred by Plaintiffs in successfully prosecuting this case were
2 \$26,102.90. The prejudgment interest on this amount is \$9,616.12. See Ex. 4.

3 Thus, Plaintiffs are seeking prejudgment interest in the amount of \$188,259.96.

4 **III. CONCLUSION**

5 For the reasons set forth herein, Plaintiffs respectfully request that this Court grant this motion
6 for attorneys' fees, costs, and interest as follows: \$158,063.50 in attorneys' fees; \$26,102.90 in costs;
7 and \$188,259.96 in prejudgment interest. The total amount requested totals \$372,426.36.

8 DATED this 15th day of May, 2020.

9 Respectfully submitted,

10 **MAIER GUTIERREZ & ASSOCIATES**

11 /s/ Danielle J. Barraza

12 JOSEPH A. GUTIERREZ, ESQ.

13 Nevada Bar No. 9046

14 DANIELLE J. BARRAZA, ESQ.

15 Nevada Bar No. 13822

16 8816 Spanish Ridge Avenue

17 Las Vegas, Nevada 89148

18 *Attorneys for Plaintiffs First 100, LLC and*

19 *1st One Hundred Holdings, LLC*

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EXHIBIT 1

EXHIBIT 1

DECLARATION OF JOSEPH A. GUTIERREZ, ESQ. IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES, COSTS, AND INTEREST

I, Joseph A. Gutierrez, declare as follows:

1. I am a partner with the law firm of MAIER GUTIERREZ & ASSOCIATES, attorneys for Plaintiff. I am knowledgeable of the facts contained herein and am competent to testify thereto.

2. I am over the age of 18 and I have personal knowledge of all matters set forth herein. If called to do so, I would competently and truthfully testify to all matters set forth herein, except for those matters stated to be based upon information and belief, and as to those matters I am informed and believe them to be true.

3. I make this affidavit in support of Plaintiffs' motion for attorneys' fees, costs, and interest in the action titled *First 100, LLC et al. v. Joel Just, et al.*, Case No. A-14-705993-B, filed in the Eighth Judicial District Court, Clark County, Nevada (the "Action").

4. At all times, I have been lead counsel and counsel of record for the plaintiffs (First 100, LLC and First One Hundred Holdings, LLC) in the Action.

5. In its Findings of Fact, Conclusions of Law, and Judgment, this Court unambiguously ruled that "[P]ursuant to Sections 13.9 and 13.10 of the 1st One Hundred Operating Agreement (Trial Exhibit 1), ***Plaintiffs are entitled to fees and costs, with the amount to be determined in post-trial motion practice with Plaintiffs' supporting documentation.***" See FFCL at pp. 7-8, *on file* (emphasis added).

6. Accordingly, Plaintiffs are bringing this motion for fees and costs against defendants Joel Just and Eagle Rock Asset Management, LLC under Nevada common law allowing for an award of attorney fees by express contractual provisions, *see e.g. Musso v. Binick*, 104 Nev. 613, 615, 764 P.2d 477, 477 (1988); NRS 18.010(2)(b); *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969); and NRS 18.005 and 18.020, respectively.

7. Plaintiffs initiated this action over five years ago, on August 22, 2014. Plaintiffs only initiated litigation after defendants Just and Eagle Rock Asset Management, LLC refused to abide by Plaintiffs' pre-litigation Cease and Desist Demand Letter (Joint Exhibit 4). Litigation was considered a last resort for Plaintiffs.

1 8. The Action has an extensive briefing history. Shortly after initiating litigation,
2 Plaintiffs filed for a temporary restraining order and preliminary injunction. On December 19, 2014,
3 the Court issued an order granting Plaintiffs' motion for preliminary injunction (*See* J10 for amended
4 order), which granted Plaintiffs' request in for injunctive relief by:

- 5 • precluding Defendants from engaging in any transaction when the basis of the
6 transaction is based on Plaintiffs' business model, or any other information protected
7 under 3.1 confidentiality clause in the Operating Agreement;
- 8 • precluding Defendants from revealing or disclosing the Plaintiffs' contract for
9 purchase of account receivables on deeds relating to HOA liens, client financial
10 information, and client business models;
- 11 • precluding Defendants from revealing or disclosing any of Plaintiffs' non-public
12 information which includes Plaintiffs' business model, legal research, and conclusions
13 based on Plaintiffs' business model, operating practices and policies, purchase and sale
14 agreements relating to HOA liens or foreclosures, and the First 100 confidential
15 information packet;
- 16 • precluding Defendants from soliciting, obtaining, or using confidential information
17 that may be provided by Plaintiffs' employees and as to information that is protected
18 under Section 3.14 of the Operating Agreement; and
- 19 • precluding defendants from visiting Plaintiffs' office space.

20 9. Thus, in partially granting the request for injunctive relief, *the Court – very early in*
21 *this litigation – found there was a likelihood of success on the merits of Plaintiffs' claims* and a
22 reasonable probability that Defendants' conduct, if allowed to continue, would cause irreparable harm
23 for which a compensatory damage is an inadequate remedy. *Univ. & Cmty. Coll. Sys. of Nev. v.*
24 *Nevadans for Sound Gov't*, 120 Nev. 712, 721, 100 P.3d 179, 187 (2004).

25 10. Nevertheless, defendants Just and Eagle Rock Asset Management, LLC continued
26 prolonging this litigation and rebuffed numerous settlement overtures.

27 11. Further evidence was uncovered regarding defendants Just and Eagle Rock Asset
28 Management, LLC involving other individuals and entities in their wrongdoing, which led to Plaintiffs

1 seeking leave to file a second amended complaint, which was granted. Although the Court ultimately
2 compelled certain claims brought against other entities and individuals to arbitration, the Court denied
3 Just and Eagle Rock Management Asset's joinder on that issue. Furthermore, the claims against the
4 other defendants were necessarily brought and litigated as a result of defendants Just and Eagle Rock
5 Asset Management, LLC's decision to involve those other entities and individuals (namely Kregg
6 Hale, Colgan Financial Group, James Coyne, Robert Colgan, Hera East Holdings, LLC, Stoneleigh
7 Partners Acquisition Corp., Todd Coffin, and Source Capital Group, Inc.) in their harmful actions
8 against Plaintiffs. As such, Plaintiffs' claims against the other defendants were sufficiently
9 interrelated to the successful claims against defendants Just and Eagle Rock Asset Management, LLC.
10 The work associated with the claims against all other defendants (and attorneys' fees incurred) became
11 necessary as a direct result of Just and Eagle Rock Asset Management, LLC's involvement with those
12 defendants as it related to replicating First 100's business model.

13 12. This Action involved extensive discovery and cumulated in a bench trial in January
14 2020.

15 13. Although the Court has already properly determined that Plaintiffs are entitled to
16 attorneys' fees pursuant to a contractual agreement, fees are also warranted under NRS 18.010(2)(b)
17 because defendants Just and Eagle Rock Asset Management, LLC defended this Action and brought
18 meritless counterclaims without reasonable grounds and/or did so to harass Plaintiffs.

19 14. In connection with the work handled by my firm in this action, the itemized invoices
20 for attorneys' fees (Exhibit 2) identify: (a) the date on which services were performed; (b) the identify
21 of the attorney or professional performing the service; (c) the time devoted to each identified service
22 along with the attorney or professional's billing rate and the corresponding total value of the service;
23 and (d) a general description of the service provided.

24 15. The attorneys' and paralegals' work was billed on an hourly basis, and reflected on
25 monthly invoices attached as Exhibit 2. Exhibit 2 contains the actual invoices that were prepared and
26 maintained by my office in the regular course of its business. Daily time entries were required to be
27 made at or about the time of the activity reflected thereon, and to accurately reflect the amount of time
28 expended on the particular activities undertaken on behalf of the Plaintiffs. The time entries were

1 entered into a billing program in our computer system, and sorted by client and matter number so that
2 each client/matter number received an individual bill reflecting the time spent by every attorney and
3 paralegal on file during the preceding month. The time entries were then prepared in a format that
4 constituted a draft of the bill, with time converted to a dollar amount for each day during the month,
5 and a total for the month in question. The draft bill was then reviewed by me and my firm partner,
6 Jason Maier, Esq., in addition to each attorney working on the matter, to ensure the accuracy of the
7 billings and disbursements that there were no errors in entering the information into the computer.
8 This procedure has proven to be trustworthy and to render accurate and timely bills. I also re-reviewed
9 each time entry in preparing this Declaration and removed and redacted portions of certain entries to
10 preserve attorney-client and attorney work product privilege.

11 16. All of the fees and costs identified in the itemized invoices are (a) fees and costs that
12 have been billed to Plaintiffs, which Plaintiffs have either paid or agreed to pay pursuant to the terms
13 of its fee agreement with my firm, and (b) related to the claims and defenses asserted by the parties in
14 the Action.

15 17. If called upon as a witness, I could and would competently testify that the foregoing
16 procedure was in fact followed in the representation of Plaintiffs in the Action.

17 18. In support of the first *Brunzell* factor (qualities of the advocates); Plaintiffs were
18 represented by attorneys from the law firm MAIER GUTIERREZ & ASSOCIATES, which has been
19 representing plaintiffs in civil cases since August 2011. Prior to opening MAIER GUTIERREZ &
20 ASSOCIATES, the firm's partners previously worked for law firms such as GREENBERG TRAURIG and
21 BECKLEY SINGLETON, among others. These firms are well known in the Las Vegas legal community
22 with a reputation for experienced and professional attorneys.

23 19. I am the attorney primarily responsible for handling this matter on behalf of Plaintiffs.
24 I received a law degree from Pepperdine University School of Law in 2004. Following graduation
25 and admission to the Nevada Bar, I began my career at a small Las Vegas litigation firm. Prior to
26 founding MAIER GUTIERREZ & ASSOCIATES, I served as a litigator with Nevada's oldest incorporated
27 law firm, BECKLEY SINGLETON, and then at the international law firm, GREENBERG TRAURIG. Danielle
28 J. Barraza, Esq. (reflected on invoices as DJB) is an associate at MAIER GUTIERREZ & ASSOCIATES.

1 She received a law degree from the William S. Boyd School of Law in 2015 and has been practicing
2 law with my firm since becoming admitted to the Nevada Bar in October 2015. Prior to becoming
3 admitted to the Nevada Bar, Ms. Barraza worked at my firm as a law clerk, which reflects why her
4 hourly rate changed in the invoices, as set forth below. Margaret E. Schmidt, Esq. (reflected on
5 invoices as MES) is a former associate at MAIER GUTIERREZ & ASSOCIATES. She received a law
6 degree from the William S. Boyd School of Law and has been a member of the Nevada Bar since
7 October 2011. Ashley Gordon Hanks, Esq. (reflected on invoices as AGH) is a former associate at
8 MAIER GUTIERREZ & ASSOCIATES. She received a law degree from American University and has been
9 a member of the Nevada Bar since May 2012. The above-referenced attorneys represent the attorneys
10 who were specifically assigned to this matter and who put significant work into this matter. Following
11 the departure of both Ms. Schmidt and Ms. Gordon Hanks from my firm, it was necessary to assign
12 Ms. Barraza as an associate to this matter.

13 20. The following are attorneys and law clerks who assisted with this matter on an as-
14 needed basis: Jason R. Maier, Esq. (reflected on invoices as JRM) is a founding partner at MAIER
15 GUTIERREZ AND ASSOCIATES. Mr. Maier received a law degree from American University's
16 Washington School of Law in 2003 and has been a member of the Nevada Bar since 2003. Prior to
17 establishing MAIER GUTIERREZ & ASSOCIATES, Mr. Maier worked as an attorney with BECKLEY
18 SINGLETON and GREENBERG TRAUIG. Mr. Maier also began his legal career as a law clerk for United
19 States District Judge James C. Mahan (District of Nevada). Stephen G. Clough, Esq. (reflected on
20 invoices as SGC) is an associate at MAIER GUTIERREZ & ASSOCIATES. He received a law degree from
21 Syracuse University and has been a member of the Nevada Bar since December 2007. Collin M.
22 Jayne, Esq. (reflected on certain few invoices as CMJ) is a former law clerk and associate at MAIER
23 GUTIERREZ & ASSOCIATES. He received a law degree from the William S. Boyd School of Law in
24 2015 and was admitted to the Nevada Bar in October 2015. After becoming admitted to the Nevada
25 Bar, Mr. Jayne worked at my firm as an associate. Kathryn L. Butler, Esq. (reflected on invoices as
26 KLB) is a former law clerk and associate at MAIER GUTIERREZ & ASSOCIATES. She graduated from
27 the William S. Boyd School of Law in 2014 and has been a member of the Nevada Bar since October
28 2014. After becoming admitted to the Nevada Bar, Ms. Butler worked at my firm as an associate.

1 Robert P. Loftus, Esq. (reflected on invoices as RPL) and Stephanie M. Getler, Esq. (reflected on
2 invoices as SMG) are former law clerks at MAIER GUTIERREZ & ASSOCIATES, who have since gone
3 on to become members of the Nevada Bar. Katherine E. Frank (reflected on invoices as KEF) and
4 Pengxiang Tian (reflected on invoices as PT) also billed to this matter in their capacity as law clerks.
5 Any billings attributed to Anna Sichtung (ANS) refer to Ms. Sichtung, who works at my law firm as a
6 law clerk.

7 21. Additionally, Charity M. Johnson (referred to as CMB and then as CMJ) and Natalie
8 Vazquez (NDV) worked on this matter in their capacity as paralegals. These paralegals have
9 significant experience in business litigation matters.

10 22. The current hourly rate for myself and for my partner Jason M. Maier, Esq. is \$495 per
11 hour. Our hourly rates for this matter began at \$295 per hour (back in 2014) and have increased
12 steadily and appropriately as the years have passed, which is why there are different billing rates
13 reflected on the invoices.

14 23. Associates Ashley Gordon Hanks, Esq. and Margaret E. Schmidt, Esq.'s hourly rates
15 for this matter were \$245 per hour. Danielle J. Barraza, Esq., who actively participated as trial counsel
16 in this matter and who has worked as trial counsel on other matters with me and my partner Mr. Maier
17 (including in federal court), originally worked on this matter in her capacity as a law clerk, and her
18 law clerk rate was \$195 per hour. Ms. Barraza's hourly rate thereafter increased at various appropriate
19 intervals and is now \$395 per hour, which is why there are different billing rates reflected on the
20 invoices. Collin M. Jayne, Esq.'s hourly rate as a law clerk was \$195 per hour, and after becoming
21 admitted to the Nevada Bar his rate was \$245 per hour. Kathryn L. Butler, Esq.'s hourly rate as an
22 associate was \$245 per hour. The hourly rate for law clerks Robert P. Loftus, Stephanie M. Getler,
23 and Katherine E. Frank was \$195 per hour. The current hourly rate for law clerk Pengxiang Tian is
24 \$150 per hour. The hourly rate for paralegals Charity M. Johnson and Natalie Vazquez in this matter
25 was \$150 per hour.

26 24. The hourly rates charged by MAIER GUTIERREZ & ASSOCIATES on this matter have at
27 all times been similar to those typically found in Las Vegas for law firms handling these types of
28 matters. The rates charged to this matter are the same rates that the firm typically charged to other

1 clients during the relevant time period. Based upon my knowledge and experience, these hourly rate
2 are representative of the typical hourly rates that would be charged by lawyers, law clerks, and
3 paralegals in Nevada with similar experience, skill, and credentials in a similar matter.

4 25. Based upon my knowledge and experience, the time spent by individuals who assisted
5 with this matter was reasonable and necessary for the tasks performed in a matter of this nature.

6 26. Plaintiffs' fees in this matter (itemized in Exhibit 2), which again, was in litigation for
7 over five years, total \$155,563.50. Based upon my knowledge and experience, these fees were
8 reasonable and necessary for the services provided in a matter of this nature, significance, and
9 magnitude, and were actually incurred in this matter since July of 2014. To be clear, this amount does
10 not include the various interest charges reflected on the attorney fee invoices. This amount accounts
11 for the actual professional services rendered over the course of 5-plus years, which is why this amount
12 is significantly lower than the total balances reflected on the invoices. Although I am providing the
13 Court with certain invoices which reflect interest-only charges, as there were certain months that no
14 professional work was done on this matter, this is being done only to provide an understanding as to
15 the total balance.

16 27. As to the costs, the itemized statement of costs are supported in Plaintiffs' April 29,
17 2020 Verified Memorandum of Costs. As will be reflected in Plaintiffs' opposition to the motion to
18 retax, Plaintiffs agree that because counsel defendants Just and Eagle Rock Asset Management, LLC
19 recently signed a stipulation and order to release the \$7,500 bond associated with this matter, Plaintiffs
20 are not going to be trying to recover that amount again as a cost. However, with respect to the claim
21 that certain court filing fees are not substantiated by documents, that is because the earlier filings are
22 on Wiznet, which this office cannot access anymore. The Court switched to the File and Serve system
23 in 2016, which is why we were only able to obtain documentation on court filing fees from that point
24 onwards (incidentally, because of the procedural posture of this case, Plaintiffs' next filing was not
25 until November 2018). There should be no disputing that prior to that point, Plaintiffs incurred filing
26 fees for the early litigation filings.

27 28. With respect to the second *Brunzell* factor (the character of the work to be done, its
28 difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the

1 prominence and character of the parties where they affect the importance of the litigation), this was a
2 complex business matter involving 16 claims asserted against defendant Just, 7 claims asserted against
3 defendant Eagle Rock Asset Management, LLC, and 3 counterclaims against plaintiff First 100.
4 Preparation for the bench trial required considerable time, skill, and effort. While the dismissal of the
5 counterclaims was inevitable based on the facts of this case and the total lack of evidence defendant
6 Just provided for those counterclaims, Plaintiffs had to engage in significant discovery and motion
7 practice in order to prove their claims against defendants Just and Eagle Rock Asset Management,
8 LLC.

9 29. With respect to the third *Brunzell* factor (the skill, time, and attention given to the
10 work), the preparation was thorough and complete. In order to properly represent Plaintiffs, many
11 hours of attorney work were required, including but not limited to: briefing on a motion for TRO and
12 preliminary injunction (which was granted to Plaintiffs); briefing on a motion to amend the complaint
13 (which was granted to Plaintiffs); briefing on keeping this matter out of arbitration with respect to
14 defendants Just and Eagle Rock Asset Management; preparing and sending written discovery requests
15 to defendants Just and Eagle Rock Asset Management, LLC; deposing Joel Just, Kregg Hale, and
16 David Swenson; preparing this matter for the bench trial, which included witness preparation and
17 exhibit preparation; and preparing closing briefs. Considering the amount of time and effort exerted
18 by Plaintiffs' counsel, the fees are clearly substantiated. Plaintiffs' attorneys are a small firm, and the
19 steps that needed to be taken to take this matter through trial consumed much of the firm's time. The
20 fees and rates charged for this case are customary for representing clients in commercial and business
21 litigation. The amount of attorneys' fees requested is reasonable as compared to the issues and the
22 amount in controversy and the results obtained.

23 30. With respect to the fourth *Brunzell* factor (the results obtained), Plaintiffs incurred
24 significant attorneys' fees related to successfully prevailing at the bench trial, with the Court awarding
25 Plaintiffs a judgment in the amount of \$420,000, and dismissing Just's counterclaims. The work
26 necessary to achieve a successful result was delegated to capable attorneys based on experience in an
27 attempt to minimize costs. Investigation, preparation, research, drafting, and filing were performed
28 at the lowest cost to Plaintiffs given other workload considerations, and defendants Just and Eagle

1 Rock Asset Management, LLC should now bear that cost as a result of contractual obligations and
2 defendants' unfounded insistence upon taking this matter all the way through trial.

3 31. For the foregoing reasons, the requested award of attorneys' fees in the amount of
4 \$155,563.50 for the work done through April 30, 2020 was reasonably and necessarily incurred in
5 connection with obtaining Plaintiffs' successful results.

6 32. The Plaintiffs reasonably and necessarily incurred the costs set forth in the
7 Memorandum of Costs, minus the \$7,500 associated with the bond that should be returned to Plaintiffs
8 via Stipulation and Order submitted to the Court. Thus, the revised total of costs is \$26,102.90, as
9 reflected on the prejudgment interest worksheet attached as Exhibit 4.

10 33. In making this Declaration, I declare under penalty of perjury and the laws of the State
11 of Nevada that the foregoing is true and correct to the best of my information, knowledge, and belief.

12 DATED this 15th day of May, 2020.

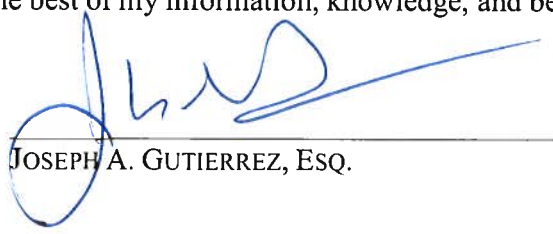
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14 _____
15 JOSEPH A. GUTIERREZ, ESQ.
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EXHIBIT 2

EXHIBIT 2

Maier Gutierrez Ayon
400 South Seventh Street
Suite 400
Las Vegas, NV 89101
Telephone: 702.629.7900
Fax: 702.629.7925

08/17/2014

Invoice No. 2137

Jay Bloom
11920 Southern Highlands Parkway
Suite 200
Las Vegas, NV 89141

Client Number: 2002 Jay Bloom
Matter Number: 200349 First 100, LLC v. Kregg Hale et al
For Services Rendered Through 07/31/2014.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/30/2014	JAG	Meeting with clients regarding [REDACTED] matter and recovery of evidence in support of claims against him, Joel Just, and Colgan; review emails and conduct research on potential claims and timing of filing complaint; confer with clients following same regarding case plan.	3.50	\$1,032.50
07/31/2014	JAG	Confer with client regarding case plan; begin outlining causes of action against defendants and analyze settlement release issues with Colgan.	1.20	\$354.00
Billable Hours / Fees:			4.70	\$1,386.50

Timekeeper Summary

Timekeeper JAG worked 4.70 hours at \$295.00 per hour, totaling \$1,386.50.

Continued On Next Page

AA1033

Client Number: 2002
Matter Number: 200349

08/17/2014
Page: 2

Prior Balance:	\$0.00
Payments Received:	\$0.00
Current Fees:	\$1,386.50
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u>\$1,386.50</u>

Thank you for letting us serve you.
Payment due upon receipt.

PLEASE NOTE OUR NEW MAILING
AND BUSINESS ADDRESS

Maier Gutierrez Ayon
400 South Seventh Street
Suite 400
Las Vegas, NV 89101
Telephone: 702.629.7900
Fax: 702.629.7925

09/10/2014
Invoice No. 2314

Jay Bloom
11920 Southern Highlands Parkway
Suite 200
Las Vegas, NV 89141

Client Number: 2002 Jay Bloom
Matter Number: 200349 First 100, LLC v. Kregg Hale et al
For Services Rendered Through 08/31/2014.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/01/2014	JAG	Review additional emails and info on actions by Kregg Hale, continue to develop causes of action for complaint.	1.00	\$295.00
08/04/2014	JAG	Draft initial draft of complaint and review potential causes of action for same; confer with client regarding case status and plan.	1.50	\$442.50
08/05/2014	JAG	Continue to research causes of action; participate in conference with client to discuss case plan and options for litigation; review documents in support of complaint following same.	3.50	\$1,032.50
08/06/2014	RPL	Research breach of fiduciary duty case law and defenses; research breach of confidential relationship claims and fraudulent concealment/fraudulent misrepresentation; outline elements for claims in preparation of drafting complaint.	3.00	\$585.00
08/07/2014	RPL	Conduct research and draft CFAA complaint section of complaint; conduct research and draft NRS 205.4765 section of complaint; research and draft intentional interference with prospective economic advantage claim analysis; research and draft claims for conversion, trespass to chattels and embezzlement.	5.00	\$975.00
08/07/2014	RPL	Continue to reveiw loan agreement and settlement agreement in preparation of further analysis of complaint and claims.	3.00	\$585.00

Continued On Next Page

08/08/2014	RPL	Review and edit draft complaint; supplement same with facts and issues related to employment duties and obligations as an executive for the company.	1.20	\$234.00
08/08/2014	RPL	Review and edit proposed settlement agreement with Mr. Hale.	1.30	\$253.50
08/11/2014	JAG	Review changes to draft complaint and continue to revise claims against Gregg Hale; review indemnification provisions and potential for tendering of defense by Hale; research fraud exceptions for same.	1.50	\$442.50
08/11/2014	RPL	Update facts section of complaint; Review new documents and correspondence in client file; Review and supplement new causes of action client added to the complaint.	3.50	\$682.50
08/11/2014	RPL	Research constructive trust and draft cause of action in complaint; research RICO statutes and drafting cause of action in complaint.	2.50	\$487.50
08/11/2014	RPL	Research and outline American Arbitration Association procedure in case matter is removed to arbitration; confer with Mr. Gutierrez regarding same.	1.00	\$195.00
08/12/2014	JRM	Draft and revise preservation of evidence letter; confer with Mr. Gutierrez regarding same.	0.40	\$118.00
08/12/2014	RPL	Continue to review American Arbitration Association issues and basis for exclusion from arbitration under terms of operating agreement.	1.50	\$292.50
08/12/2014	RPL	Review operating agreement and indemnification provisions for issues related to potential claim for same; confer with Mr. Gutierrez regarding findings.	1.50	\$292.50
08/12/2014	RPL	Research indemnification exclusions; Research D&O and E&O issues.	2.00	\$390.00
08/13/2014	JAG	Attend meeting with clients [REDACTED] [REDACTED] confer with counsel for Colgan following meeting to discuss pending settlement status; revise settlement agreement to include non-compete information.	6.50	\$1,917.50
08/13/2014	RPL	Research model rules of professional conduct and Nevada rules in reference to negotiating tactics with opposing counsel.	1.00	\$195.00
08/13/2014	CMB	Finalize and serve preservation of evidence letter to Gregg Hale.	0.30	\$45.00

Continued On Next Page

08/15/2014	JAG	Confer with counsel for Kregg Hale regarding status of communication with client and settlement options; review issues related to criminal aspects of Mr. Hale's conduct and probation violation; confer with client regarding case status.	0.80	\$236.00
08/18/2014	CMB	Finalize and serve cease and desist and demand letter to Joel Just; email correspondence with client regarding same.	1.20	\$180.00
08/19/2014	JAG	Confer with counsel for Mr. Hale regarding case status and settlement options; review issues related to employment separation and information needed for Joel Just action; continue to review arbitration provisions and liquidated damages issues; confer with client regarding case plan.	2.20	\$649.00
08/19/2014	AGH	Confer with Ms. Schmidt re: drafting Complaint; Review correspondence from client re: inclusion of 1st One Hundred and First 100 as plaintiffs; Begin Drafting Complaint; Review documents provided by client to evaluate facts needed for Complaint	3.20	\$784.00
08/19/2014	MES	Confer with Mr. Gutierrez and Ms. Hanks regarding status of case and preparing complaint.	0.20	\$49.00
08/20/2014	AGH	Continue drafting Complaint; Email client re: clarifying facts for the Complaint	2.10	\$514.50
08/21/2014	JAG	Draft settlement agreement for Mr. Hale; research employment statutes related to termination and final pay check; confer with client regarding [REDACTED] [REDACTED] review issues related to documents needed for settlement agreement to be finalized.	2.50	\$737.50
08/21/2014	JAG	Confer with counsel for Mr. Hale regarding affidavit and scope of testimony; review emails on same; confer with client regarding plan for settlement; revise draft settlement agreement.	0.80	\$236.00
08/21/2014	AGH	Review draft of Complaint facts, returned from client; Revise draft of Complaint to incorporate client's revisions of facts; Complete drafting of Complaint, including addition of all causes of action; Email draft of Complaint to client and Mr. Gutierrez for comment	4.30	\$1,053.50
08/22/2014	AGH	Exchange emails with client re: filing of Complaint and assigned department; Review, revise, and execute paralegal-drafted Initial Appearance Fee Disclosure and Civil Coversheet; Begin drafting Ex Parte Application for Temporary Restraining Order and Motion for Preliminary Injunction on Order Shortening Time	1.40	\$343.00

Continued On Next Page

08/22/2014	JAG	Phone calls with counsel for Kregg Hale; confer with client regarding same; review and respond to emails to counsel for Hale regarding draft affidavit and production of emails; review wage issues and statutes cited by Hale's counsel; review offset of funds and criminal embezzlement issues.	1.30	\$383.50	
08/23/2014	JAG	Review and edit application for TRO; research issues related to adding Hale to Just complaint and issues related to mandatory arbitration provision in operating agreement.	1.50	\$442.50	
08/25/2014	AGH	Review 1st One Hundred operating agreement to assess binding quality of arbitration clause.	0.40	\$98.00	
08/26/2014	JAG	Review and edit amended complaint to add Kregg Hale' research arbitration provision issues in preparation of potential motion to compel arbitration.	1.00	\$295.00	
08/26/2014	AGH	Confer with Mr. Gutierrez re: amending complaint to add in Kregg Hale; Draft First Amended Complaint to include facts and causes of action relating to Kregg Hale; Draft email to client re: draft of Amended Complaint.	4.90	\$1,200.50	
08/27/2014	JAG	Review and edit amended complaint against Joel Just; and Kregg Hale; confer with client regarding case plan.	1.00	\$295.00	
08/27/2014	AGH	Exchange emails with client re: facts for Amended Complaint; Revise Amended Complaint [REDACTED] Telephone calls to Michael Henrickson at First 100 re: date of employment for Kregg Hale; Briefly research ability to file Amended Complaint without obtaining leave of court.	0.80	\$196.00	
08/27/2014	RPL	Review Hale's complaint for redline changes.	0.50	\$0.00	N/C
08/27/2014	CMB	Finalize and file first amended complaint; draft summons to Kregg Hale; coordinate service of same.	1.70	\$255.00	
08/28/2014	AGH	Confer with client re: facts for his declaration in support of application for injunctive relief; Draft client declaration in support of application for injunctive relief; Draft counsel's affidavit in support of application for injunctive relief; Continue drafting Application for TRO and Motion for Preliminary Injunction, to add in detailed facts section and beginnings of legal argument sections.	6.60	\$1,617.00	
08/28/2014	RPL	Review issues related to injunctive relief being sought, service, and amending of complaint to add new parties; confer with Mr. Gutierrez regarding same.	0.80	\$156.00	
08/29/2014	AGH	Finish drafting Application for TRO and Motion for Preliminary Injunction, completing legal argument section; Draft proposed TRO.	5.90	\$1,445.50	

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Client Number: 2002
Matter Number: 200349

09/10/2014
Page: 5

08/29/2014	CMB	Finalize and submit ex parte application and motion for preliminary injunction to court.	1.10	\$165.00
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Billable Hours / Fees:	86.90	\$20,792.00
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Timekeeper Summary

Timekeeper AGH worked 29.60 hours at \$245.00 per hour, totaling \$7,252.00.

Timekeeper CMB worked 4.30 hours at \$150.00 per hour, totaling \$645.00.

Timekeeper JAG worked 25.10 hours at \$295.00 per hour, totaling \$7,404.50.

Timekeeper JRM worked 0.40 hours at \$295.00 per hour, totaling \$118.00.

Timekeeper MES worked 0.20 hours at \$245.00 per hour, totaling \$49.00.

Timekeeper RPL worked 27.30 hours at \$195.00 per hour, totaling \$5,323.50.

Timekeeper RPL worked 0.50 hours at no charge.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/22/2014	Filing Fee	\$312.50
08/22/2014	Filing Fee	\$3.50
08/27/2014	Filing Fee	\$3.50
08/27/2014	Filing Fee	\$3.50
Total Costs		\$323.00

Prior Balance:	\$1,386.50
Payments Received:	\$0.00
Current Fees:	\$20,792.00
Advanced Costs:	\$323.00
Late Charges:	\$13.86
TOTAL AMOUNT DUE:	\$22,515.36

Thank you for letting us serve you.
Payment due upon receipt.

PLEASE NOTE OUR NEW MAILING
AND BUSINESS ADDRESS

October 25, 2014

Mr. Jay Bloom
11920 Southern Highlands Parkway
Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 Just/Hale
Invoice No.: 10015 For Services Rendered Through: September 30, 2014

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
09/02/2014	JAG Draft email to counsel for Colgan regarding amending complaint to name Colgan and its affiliates; confer with client regarding case status.	1.00	295.00
09/03/2014	CMB File ex parte application for temporary restraining order and motion for preliminary injunction on order shortening time.	0.30	45.00
09/04/2014	JAG Review service issues for Gregg Hale; analyze timing of TRO and jurisdictional issues in case.	1.00	295.00
09/04/2014	CMB Coordinate service via receipt of copy of ex parte application for temporary restraining order and motion for preliminary injunction on order shortening time.	0.20	30.00
09/10/2014	MES Review Fed Ex receipts pertaining to violation of TRO; Confer with Ms. Hanks and Mr. Gutierrez regarding non-entry of TRO.	0.30	73.50
09/14/2014	JAG Review ex parte application for TRO and issues with lack of opposition by Defendants; analyze service issues and prepare for hearing on preliminary injunction.	1.30	383.50
09/15/2014	JAG Review pleadings and case law cited by Defendants in preparation of attending hearing on application TRO and motion for preliminary injunction; confer with client regarding case plan; draft outline of argument for hearing and gather further evidence to support an injunction	4.50	1,327.50
09/15/2014	AGH Review lengthy Opposition to Motion for Preliminary Injunction and Countermotion to Dismiss Complaint; Confer with Mr. Gutierrez re: litigation strategy moving forward.	0.80	196.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10015 For Services Rendered Through: September 30, 2014

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		<u>Hours</u>	<u>Amount</u>
09/16/2014	JAG	Finalize outline of argument and attend hearing on application TRO and motion for preliminary injunction; confer with client regarding case plan following same; review issues for supplemental pleadings needed.	3.60 1,062.00
09/16/2014	RPL	Reviewed opposition to TRO and motion for preliminary injunction; Reviewed LM Funding LLC and HOA Capital Advisors business models as referenced in opposition; Reviewed operating agreement.	2.50 487.50
09/16/2014	AGH	Confer with Mr. Gutierrez re: outcome of hearing on motion for preliminary injunction and follow up tasks needed.	0.20 49.00
09/18/2014	JAG	Review damages sought in light of recent ruling on NRS 116; confer with client regarding case plan; analyze issues related to potential counter-claims and continue to research issues on arbitration clause for opposition to motion for summary judgment.	1.50 442.50
09/19/2014	JAG	Review and edit second amended complaint to add CFG parties; confer with client regarding case plan; begin outlining issues for supplemental briefing for TRO and opposition to motion for summary judgment.	2.50 737.50
09/19/2014	AGH	Begin drafting Second Amended Complaint and revise paralegal-drafted Motion for Leave to File Second Amended Complaint.	2.40 588.00
09/23/2014	JAG	Confer with attorney for Kregg Hale regarding case status and settlement proposal.	0.50 147.50
09/23/2014	MES	Confer with Ms. Hanks regarding status of preliminary injunction proceedings and preparing supplemental briefing; Review court minutes from prior hearing.	0.50 122.50
09/24/2014	MES	Confer with Mr. Gutierrez regarding arguments to make in opposition to defendants' counter-motion to dismiss/summary judgment; Confer with Ms. Hanks regarding status of second amended complaint and additional information needed from client; Review declarations of Mr. Colgan and Mr. Coyne in support of defendants' opposition to ex-parte application; Research business entity details for corporate defendants and background of individual defendants; Review and edit portions of second amended complaint pertaining to background of added parties and business relationship between Colgan Financial and First 100.	2.30 563.50
09/24/2014	CMB	Telephone conference with department regarding minute order for briefing schedule.	0.10 15.00
09/25/2014	JAG	Review and respond to emails from attorney for Kregg Hale regarding case status and settlement proposal; confer with client regarding same.	0.60 177.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10015 For Services Rendered Through: September 30, 2014

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		Hours	Amount
09/25/2014	AGH	Revise Motion for Leave to File Second Amended Complaint, supplementing Introduction section and drafting legal argument sections; Draft Affidavit of counsel in support of Order Shortening Time, and draft Order Shortening Time.	2.70 661.50
09/25/2014	MES	Receive and review notes from client regarding [REDACTED] Confer with Mr. Gutierrez regarding [REDACTED] Review emails between Mr. Just and Mr. Colgan; Draft and edit portions of complaint pertaining to Mr. Coffin, Stoneleigh Partners, Hera East, and Source Capital; Draft and edit portions of complaint pertaining to establishment of Eagle Rock, Mr. Hale's termination, and defendants' actions to injure First 100; Review and edit prior causes of action to include added defendants; Draft and edit causes of action for breach of fiduciary duty against Mr. Coffin and slander of title against Mr. Coffin, Mr. Coyne and Colgan Financial; Email copy of second amended complaint to client for review; Confer with Mr. Gutierrez and Ms. Barber regarding finalizing and submitting to chambers motion for leave to file second amended complaint on order shortening time.	5.30 1,298.50
09/26/2014	JAG	Review and edit motion for leave to amend on OST and second amended complaint; incorporate recent facts into same; email motion to CFG counsel and review issues related to timing and content of supplemental pleadings for TRO.	2.00 590.00
09/26/2014	RPL	Conduct arbitration third party/nonsignatory research in preparation of supplemental pleading on motion to dismiss.	1.50 292.50
09/26/2014	RPL	Reviewed case with Ms. Schmidt; Reviewed case file in preparation for working on opposition to motion to compel.	1.50 292.50
09/26/2014	MES	Receive and review edits to second amended complaint from client.	0.30 73.50
09/26/2014	CMB	Email and telephone correspondence with client regarding [REDACTED] email correspondence with Mr. Smith regarding same; finalize motion for leave to file second amended complaint on order shortening time; coordinate expedited submission to court for signature; confer with Mr. Gutierrez regarding timeline for transcript; draft and serve letter to court reporter regarding transcript; telephone conference with court reporter regarding transcript.	1.50 225.00
09/27/2014	JAG	Begin drafting opposition to Defendants' motion for summary judgment on jurisdiction issue, operating agreement arbitration clause, and opposing TRO; draft supplemental briefing in support of TRO; research case law in support of same; review case file for further evidence in support of injunctive relief.	6.50 1,917.50
09/29/2014	JAG	Continue drafting opposition to Defendants' motion for summary judgment on jurisdiction issue, operating agreement arbitration clause, and supplemental argument in support of TRO; research case law on	2.40 708.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10015 For Services Rendered Through: September 30, 2014

Page No. 4

		<u>Hours</u>	<u>Amount</u>
	arbitration agreements for non-parties and incorporate argument on same		
09/29/2014 CMB	Finalize, file and serve motion for leave to file second amended complaint; coordinate service via receipt of copy to opposing counsel.	0.30	45.00
09/30/2014 RPL	Researched arbitration intertwined doctrine; Researched arbitration nonparties and nonsignatories; Researched arbitration constitutionality; Researched arbitration estoppel claims; Researched arbitration law review articles.	3.00	585.00
09/30/2014 JAG	Finish drafting opposition to Defendants' motion for summary judgment on jurisdiction issue, draft argument section on various methods to deny Defendants' motion to compel arbitration, continue to outline issues for supplemental argument in support of TRO; research more case law on arbitration agreements for non-parties and incorporate argument on same	4.80	1,416.00
09/30/2014 JAG	Revise and edit supplement and opposition to Defendants' motion for summary judgment on jurisdiction; review issues related to timing of her on motion for leave to amend; draft declaration of client in support of opposition; confer with client regarding case status; confer with court clerk regarding documents needed for hearing.	1.50	442.50
09/30/2014 MES	Receive and review defendant's supplemental brief regarding jurisdiction; Confer with Mr. Gutierrez regarding status of opposition to counter-motion for summary judgment and supplemental briefing in support of motion for injunctive relief; Review Defendants' opposition to motion for injunctive relief; Review emails between Mr. Just, Mr. Coffin, and Mr. Hale; Draft and edit portion of supplemental briefing pertaining to injunctive relief and inconsistencies in Defendants' factual statements; Confer with Mr. Gutierrez regarding court's request for filing deadline; Format and compile exhibits for supplemental brief; Confer with Ms. Barber regarding finalizing and filing brief.	4.40	1,078.00
09/30/2014 CMB	Finalize, file and serve opposition to counter-motion for summary judgment and supplemental briefing in support of application for temporary restraining order and motion for preliminary injunction; coordinate courtesy copy to court.	1.20	180.00
PROFESSIONAL SERVICES RENDERED:		65.00	\$16,843.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	33.70	295.00	\$9,941.50
Ashley G. Hanks	6.10	245.00	\$1,494.50
Margaret E. Schmidt	13.10	245.00	\$3,209.50

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10015 For Services Rendered Through: September 30, 2014

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Name	Hours	Rate	Amount
Robert P. Loftus	8.50	195.00	\$1,657.50
Charity M. Barber	3.60	150.00	\$540.00

CLIENT COSTS ADVANCED

	Amount
08/30/2014 Delivery Services/Messengers	25.00
08/30/2014 Delivery Services/Messengers	12.50
08/30/2014 Subpoena/Process Fees	70.00
08/30/2014 Subpoena/Process Fees	120.00
08/31/2014 Copies/Prints	128.10
08/31/2014 Color Copies/Prints	N/C
08/31/2014 Facsimile	N/C
08/31/2014 Delivery Services/Messengers	10.00
09/29/2014 Deposition transcripts	319.80
200349/Bloom, Mr. Jay /Invoice #140117	
Check # 10485	
09/30/2014 Copies/Prints	467.25
09/30/2014 Color Copies/Prints	N/C
09/30/2014 Facsimile	N/C
09/30/2014 Court fees	3.50
09/30/2014 Court fees	3.50
09/30/2014 Court fees	3.50
09/30/2014 Westlaw	99.00
CLIENT COSTS ADVANCED:	\$1,262.15

TOTAL AMOUNT OF THIS INVOICE:

\$18,105.15



MAIER GUTIERREZ AYON PLLC
ATTORNEYS AT LAW

400 South Seventh Street
Suite 400
Las Vegas, NV 89101
702.629.7900

November 18, 2014

Mr. Jay Bloom
11920 Southern Highlands Parkway
Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 Just/Hale
Invoice No.: 10195 For Services Rendered Through: October 31, 2014

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
10/01/2014	JAG Review pleadings filed by Defendant in support of motion for summary judgment on arbitration issue and opposition to motion for leave to amend; prepare outline for oral argument on continued TRO and jurisdiction argument.	2.00	590.00
10/02/2014	CMB File receipt of copy.	0.10	15.00
10/02/2014	JAG Attend hearing on Plaintiffs' motion for injunctive relief; Defendants' motion for summary judgment on arbitration jurisdiction issue and motion for leave to amend; revise outline for oral argument on continued TRO and jurisdiction argument in preparation of same; confer with client following hearing to discuss case status and supplemental pleading needed by court.	6.80	2,006.00
10/02/2014	JAG Begin drafting supplemental pleadings for TRO and preliminary injunction order; review arbitration issues for bringing companion case against Just in arbitration; review timing of settlement discussions in Colgan matter following recent court rulings.	2.50	737.50
10/02/2014	CMB Draft order granting plaintiffs' motion for leave to file second amended complaint; begin drafting order on plaintiffs' ex parte application for temporary restraining order and motion for preliminary injunction; prepare summons to additional defendants.	1.00	150.00
10/03/2014	CMB Email correspondence with opposing counsel regarding order granting motion for leave to file second amended complaint.	0.10	15.00
10/03/2014	JAG Continue to draft supplemental pleadings for TRO and preliminary injunction order; draft orders on court rulings; email 2nd amended complaint to Colgan counsel; confer with client regarding case status.	2.70	796.50

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10195 For Services Rendered Through: October 31, 2014

Page No. 2

		Hours	Amount
10/06/2014	JAG	Finish drafting supplemental pleadings for TRO and preliminary injunction order; revise orders on court rulings; draft declaration for client in support of same; confer with client regarding case status.	3.30 973.50
10/06/2014	CMB	Draft, file and serve ex parte motion to seal and order regarding same; finalize, file and serve supplemental briefing regarding specific injunctive relief.	1.50 225.00
10/06/2014	AGH	Confer with Mr. Gutierrez re: drafting proposed order granting preliminary injunction; Draft proposed order granting preliminary injunction; Revise Supplemental Briefing on Preliminary Injunction and client's declaration in support thereof; Revise paralegal-drafted Motion to Permit Filing under seal.	3.70 906.50
10/07/2014	CMB	Draft order regarding defendants' motion to dismiss and motion for summary judgment; draft acceptance of service; email correspondence with opposing counsel regarding same.	0.40 60.00
10/13/2014	JAG	Draft order on motion to dismiss and counter-motion for summary judgment; confer with Brian Smith regarding Colgan litigation and documents needed for evidentiary hearing.	1.50 442.50
10/13/2014	CMB	Email correspondence with opposing counsel regarding order.	0.10 15.00
10/14/2014	RPL	Attended court hearing with Ms. Hanks	2.50 N/C
10/14/2014	CMB	Revise order; email correspondence with opposing counsel regarding same; coordinate service of same to court.	0.20 30.00
10/14/2014	AGH	Confer with Mr. Gutierrez re: status of litigation in preparation for hearing on motion for preliminary injunction; Prepare for and attend hearing on motion for preliminary injunction; Email client re: outcome of hearing on motion for preliminary injunction.	3.50 857.50
10/14/2014	JAG	Confer with client regarding [REDACTED] confer with Ms. Hanks regarding hearing on supplemental issues for TRO; review email regarding results of hearing.	1.20 354.00
10/28/2014	CMB	Draft, file and serve notice of entry of order to seal exhibit 3 to supplemental briefing.	0.20 30.00
10/30/2014	AGH	Research court records to check status of order on Motion for Preliminary Injunction; Review Court's lengthy minute order to assess client's result.	0.20 49.00
PROFESSIONAL SERVICES RENDERED:		33.50	\$8,253.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 Just/Hale
Invoice No.: 10195 For Services Rendered Through: October 31, 2014

Page No. 3

TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	20.00	295.00	\$5,900.00
Ashley G. Hanks	7.40	245.00	\$1,813.00
Robert P. Loftus	2.50	0.00	\$0.00
Charity M. Barber	3.60	150.00	\$540.00

CLIENT COSTS ADVANCED

	Amount
10/31/2014 Delivery Services/Courier - Standard	10.00
10/31/2014 Delivery Services/Courier - Standard	10.00
10/31/2014 Delivery Services/Courier - Special	25.00
10/31/2014 Delivery Services/Courier - Special	37.00
10/31/2014 Delivery Services/Courier - Special	50.00
10/31/2014 Delivery Services/Courier - Special	37.00
10/31/2014 Delivery Services/Courier - Special	50.00
10/31/2014 Copies/Prints	355.60
10/31/2014 Color Copies/Prints	N/C
10/31/2014 Facsimile	3.45
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
10/31/2014 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$606.05

INTEREST ON PRIOR BALANCE: \$184.52

TOTAL AMOUNT OF THIS INVOICE: \$9,043.57

PRIOR BALANCE: \$18,105.15

TOTAL BALANCE DUE: \$27,148.72

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$9,043.57	\$18,105.15	\$0.00	\$0.00	\$0.00

December 18, 2014

Mr. Jay Bloom
11920 Southern Highlands Parkway
Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 Just/Hale
Invoice No.: 10475 For Services Rendered Through: November 30, 2014

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
11/03/2014 KLB	Conduct legal research on whether a three day intent to take default can be entered against a defendant when the attorney who previously acknowledged that he would accept service is delaying in signing the acceptance of service (specifically look at process of service and constructive service, in addition to default judgments and attorney's acknowledgment of accepting service- look at precedent in both Nevada and Ninth Circuit)	1.70	416.50
11/03/2014 CMB	Draft three day notice of intent to take default against Colgan parties; confer with Mr. Gutierrez regarding same.	0.40	60.00
11/04/2014 CMB	File and serve three day notice of intent to take default.	0.10	N/C
11/07/2014 CMB	Confer with Mr. Gutierrez regarding defaults against Colgan defendants; draft application for entry of default and default.	0.60	90.00
11/07/2014 JAG	Review and edit application for default; review order on TRO and outline case plan going forward.	0.80	236.00
11/07/2014 JAG	Review emails from client on case status and confer with client regarding case plan; review order on TRO and analyze case process going forward; review and edit applications for default.	1.00	295.00
11/10/2014 JAG	Phone calls with opposing counsel regarding appearance for Colgan parties; conference call with client and Conn counsel regarding case status and plan; confer with Ms. Hanks regarding [REDACTED]	1.80	531.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10475 For Services Rendered Through: November 30, 2014

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			<u>Hours</u>	<u>Amount</u>
11/11/2014	AGH	Review email and letter from Just's counsel re: Just's intention to meet with IRS officer to disclose First 100 information; Email client re: same.	0.20	49.00
11/14/2014	AGH	Draft Order on Motion for Preliminary Injunction; Email Zach Takos (Just counsel) re: order approval.	1.60	392.00
11/20/2014	JAG	Move forward with default proceedings against Just; confer with client regarding [REDACTED]; email opposing counsel regarding default and failure to answer.	1.50	442.50
11/21/2014	CMB	Draft, file and serve three day notice of intent to take default.	0.20	30.00
11/24/2014	AGH	Email Zach Takos (Just counsel) re: status of order.	0.10	24.50
11/25/2014	JAG	Begin drafting opposition to motion to compel arbitration by Source Capital Defendants; research case law in support of same; confer with client regarding case status.	2.80	826.00
11/25/2014	CMB	File order and order granting motion for leave to file second amended complaint.	0.20	30.00
11/26/2014	JAG	Begin drafting opposition to motion to dismiss or motion for more definite statement filed by Colgan Defendants; research case law in support of same; confer with client regarding settlement options.	3.00	885.00
11/26/2014	CMB	Draft, file and serve notices of entry of orders.	0.40	60.00
11/29/2014	JAG	Continue drafting opposition to motion to dismiss or motion for more definite statement filed by Colgan Defendants; finish drafting opposition to motion to compel arbitration filed by the Source Capital Defendants; research case law in support of same.	4.50	1,327.50
PROFESSIONAL SERVICES RENDERED:			20.90	\$5,695.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	15.40	295.00	\$4,543.00
Ashley G. Hanks	1.90	245.00	\$465.50
Kathryn L. Butler	1.70	245.00	\$416.50
Charity M. Barber	1.80	150.00	\$270.00
Charity M. Barber	0.10	0.00	\$0.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 Just/Hale

Invoice No.: 10475 For Services Rendered Through: November 30, 2014

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CLIENT COSTS ADVANCED

	<u>Amount</u>
11/30/2014 Court Fees	3.50
11/30/2014 Court Fees	3.50
11/30/2014 Court Fees	3.50
11/30/2014 Court Fees	3.50
11/30/2014 Court Fees	3.50
11/30/2014 Court Fees	3.50
11/30/2014 Postage	0.96
11/30/2014 Delivery Services/Courier - Standard	10.00
11/30/2014 Delivery Services/Courier - Standard	10.00
11/30/2014 Delivery Services/Courier - Special	25.00
11/30/2014 Copies/Prints	106.40
11/30/2014 Color Copies/Prints	N/C
11/30/2014 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$173.36

INTEREST ON PRIOR BALANCE:	\$267.77
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TOTAL AMOUNT OF THIS INVOICE:	\$6,136.13
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PRIOR BALANCE:	\$27,148.72
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TOTAL BALANCE DUE:	\$33,284.85
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,136.13	\$9,043.57	\$18,105.15	\$0.00	\$0.00

January 06, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 10700 For Services Rendered Through: December 31, 2014

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
12/01/2014	NDV	Finalize, file, and serve opposition to defendants motion to dismiss and defendants motion to compel.	0.70 105.00
12/01/2014	JAG	Finish drafting opposition to motion to dismiss or motion for more definite statement filed by Colgan Defendants; revise and edit opposition to motion to compel arbitration filed by the Source Capital Defendants; review answer and counter-claim filed by Joel Just.	2.80 826.00
12/01/2014	AGH	Exchange emails with Zach Takos re: Order on Motion for Preliminary Injunction.	0.30 73.50
12/05/2014	CMB	Draft ex parte motion for service by publication and order permitting service by publication on defendant Hale.	1.00 150.00
12/05/2014	AGH	Exchange emails with Zach Takos re: Order on Motion for Preliminary Injunction.	0.20 49.00
12/09/2014	CMB	File temporary restraining order and order to show cause; confer with Ms. Schmidt regarding posting bond.	0.20 30.00
12/10/2014	CMB	Finalize and serve letter regarding preliminary injunction hearing.	0.20 30.00
12/10/2014	AGH	Exchange emails with Zach Takos (Just counsel) re: Order on Motion for Preliminary Injunction; Review and revise proposed order on Motion for Preliminary Injunction; Draft letter to court re: proposed Order on Motion for Preliminary Injunction; Review letter from Zach Takos (Just counsel) to court re: his perception of the appropriate language for Order on Motion for Preliminary Injunction.	1.00 245.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 10700 For Services Rendered Through: December 31, 2014

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		Hours	Amount
12/11/2014	CMB Initial draft of answer to counterclaim.	0.50	75.00
12/11/2014	AGH Review faxed correspondence from the Court re: upcoming hearings on Motion to Compel Arbitration and Motion to Dismiss.	0.10	24.50
12/14/2014	JAG Review pleadings and draft outline in preparation of attending hearing on Colgan Defendants' motion to dismiss or motion for more definite statement and motion to compel arbitration filed by the Source Capital Defendants; research NY case law in support of same.	3.30	973.50
12/15/2014	JAG Attend hearing on Colgan Defendants' motion to dismiss or motion for more definite statement and motion to compel arbitration filed by the Source Capital Defendants; research and supplement outline of argument in preparation of hearing; confer with client following hearing regarding case status; email opposing counsel settlement offer for Source Capital defendants.	3.50	1,032.50
12/15/2014	JAG Draft answer to counter-claimant's counter-complaint; review issues for settlement options and discovery to complete in preparation of NRCP 16.1 conference.	1.50	442.50
12/15/2014	CMB Finalize, file and serve answer to counterclaim.	0.20	30.00
12/16/2014	CMB Finalize, file and serve ex parte application for service by publication on Mr. Hale; coordinate service of order granting same to court for signature.	0.30	45.00
12/16/2014	AGH Review and revise Ex Parte Application to Serve Gregg Hale by publication, and proposed order thereon.	0.40	98.00
12/19/2014	NDV Draft order denying defendants motion to dismiss or in the alternative motion for more definitive statement.	0.58	87.50
12/19/2014	AGH Review faxed correspondence from the Court re: denial of Motion for Service by Publication on Hale; Evaluate options for correcting court's concerns re: need for enlargement of time to serve.	0.20	49.00
12/22/2014	NDV Draft discovery templates to propound to five of the defendants.	1.50	225.00
12/22/2014	AGH Review court order re: mandatory 16.1 conference in preparation for attendance; Confer with Mr. Gutierrez re: preparation for 16.1 conference; Attend 16.1 conference.	1.40	343.00
12/22/2014	CMB Revise ex parte application for service by publication to include language enlarging time to serve defendant; draft order regarding same; draft stipulated protective order; begin drafting joint case conference report.	1.00	150.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 10700 For Services Rendered Through: December 31, 2014

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		Hours	Amount
12/23/2014	AGH Review and revise new Motion for enlargement of time to serve and proposed order thereon; Calculate days of service available for service; Confer with Mr. Gutierrez re: tasks needed.	0.50	122.50
12/23/2014	CMB Finalize, file and serve ex parte application for service by publication and enlarging time for service; finalize and submit orders to court regarding same; continue drafting joint case conference report.	0.70	105.00
12/23/2014	JAG Revise and edit orders on motion to dismiss or motion for more definite statement; confer with local counsel for Colgan regarding same and timing of discovery; review and edit joint case conference report.	0.80	236.00
12/31/2014	CMB Draft, file and serve notices of entry of order; coordinate service by publication with Nevada Legal News.	0.50	75.00
PROFESSIONAL SERVICES RENDERED:		23.38	\$5,622.50

TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	11.90	295.00	\$3,510.50
Ashley G. Hanks	4.10	245.00	\$1,004.50
Charity M. Barber	4.60	150.00	\$690.00
Natalie D. Vazquez	2.78	150.00	\$417.50

CLIENT COSTS ADVANCED

12/31/2014	Postage	6.58
12/31/2014	Court Fees	3.50
12/31/2014	Court Fees	3.50
12/31/2014	Court Fees	3.50
12/31/2014	Court Fees	3.50
12/31/2014	Court Fees	3.50
12/31/2014	Copies/Prints	260.05
12/31/2014	Color Copies/Prints	N/C
12/31/2014	Facsimile	3.00
12/31/2014	Subpoena/Process Fees	340.00
CLIENT COSTS ADVANCED:		\$627.13

INTEREST ON PRIOR BALANCE: \$339.23

TOTAL AMOUNT OF THIS INVOICE: \$6,588.86

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 10700 For Services Rendered Through: December 31, 2014

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	<u>Amount</u>
PRIOR BALANCE:	\$33,284.85
TOTAL BALANCE DUE:	\$39,873.71

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$6,588.86	\$6,136.13	\$9,043.57	\$18,105.15	\$0.00

February 18, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 10954 For Services Rendered Through: January 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
01/02/2015	AGH Review court's order re Rule 16 Conference; Review and revise Stipulated Protective Order and Joint Case Conference Report; Email defendants' counsel re: proposed Stipulated Protective Order and Joint Case Conference Report.	0.80	196.00
01/06/2015	AGH Email opposing counsels re: status of protective order and joint case conference report.	0.10	24.50
01/08/2015	AGH Review Notice of Entry of Order re: Plaintiff's Application for Preliminary Injunction to assess which order the judge selected to execute.	0.10	24.50
01/09/2015	NDV File order denying defendants motion to dismiss; Draft, finalize, file, and serve notice of entry of order denying defendant's motion to dismiss.	0.50	75.00
01/12/2015	NDV Draft, finalize, and serve initial disclosures.	1.00	150.00
01/12/2015	CMB Draft, file and serve demand for jury trial; draft stipulation and order for dismissal of Colgan parties; draft and file certificate of service regarding Gregg Hale; finalize, file and serve joint case conference report.	0.70	105.00
01/12/2015	JAG Review and edit initial disclosures of witnesses and documents; outline discovery to complete.	1.00	295.00
01/12/2015	AGH Review and revise initial disclosures; Review emails from defendants' counsels re: approval of Joint Case Conference Report; Revise Joint Case Conference Report; Briefly review Bryce pleadings.	0.80	196.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 10954 For Services Rendered Through: January 31, 2015

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		<u>Hours</u>	<u>Amount</u>
01/14/2015	CMB Telephone conference with opposing counsel and coordinate expedited service of stipulation and order for dismissal of Colgan parties; telephone conference with court regarding urgency of same; confer with Mr. Gutierrez regarding same; draft, file and serve notice of voluntary dismissal of Colgan parties; email correspondence with opposing counsel regarding same.	0.60	90.00
01/22/2015	AGH Confer with Mr. Loftus re: drafting discovery requests.; issues needed for same.	0.30	73.50
01/23/2015	RPL Review pleadings including complaint, answer, and counterclaims in preparation for drafting written discovery; review client file including correspondence and operating agreement in preparation for drafting written discovery.	2.00	390.00
01/27/2015	RPL Draft requests for admissions to Just; outline issues of undisputed facts.	0.80	156.00
01/27/2015	RPL Finalize request for admissions; supplement information on temporary restraining order.	0.50	97.50
01/28/2015	NDV Confer with opposing counsel Zachary Takos regarding deposition availability for defendant Joel Just and advise to e-mail him directly with the request; Sent e-mail to opposing counsel Zackary Takos to request deposition availability for defendant Joel Just.	0.40	60.00
01/29/2015	AGH Confer with Mr. Loftus re: First 100/1st One Hundred business structure, to aid in drafting of discovery requests to Just.	0.20	49.00
01/29/2015	RPL Confer with Ms. Hanks about the written discovery; Review the relation of the holding company between 1st One Hundred and First 100; Draft written discovery regarding same.	1.40	N/C
01/30/2015	JAG Revise and edit first set of written discovery to Joel Just; email client re same.	0.80	236.00
01/30/2015	RPL Update requests for admissions; review case law on discovery standard in preparation for drafting interrogatories.	0.80	156.00
01/30/2015	AGH Briefly review AAA Arbitration processes; Begin drafting Demand for Arbitration for 1st One Hundred v Just.	1.30	318.50
PROFESSIONAL SERVICES RENDERED:		14.10	\$2,692.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.80	295.00	\$531.00
Ashley G. Hanks	3.60	245.00	\$882.00



Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 10954 For Services Rendered Through: January 31, 2015

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Name	Hours	Rate	Amount
Robert P. Loftus	4.10	195.00	\$799.50
Robert P. Loftus	1.40	0.00	\$0.00
Charity M. Barber	1.30	150.00	\$195.00
Natalie D. Vazquez	1.90	150.00	\$285.00

CLIENT COSTS ADVANCED

	Amount
01/14/2015 Subpoena/Process Fees 200349/Bloom, Mr. Jay /Invoice #300421551 Check # 10712	100.00
01/31/2015 Copies/Prints	61.95
01/31/2015 Color Copies/Prints	N/C
01/31/2015 Facsimile	N/C
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Delivery Services/Courier - Standard	10.00
01/31/2015 Postage	28.44
01/31/2015 Postage	7.11
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
01/31/2015 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$292.50

INTEREST ON PRIOR BALANCE:	\$341.40
TOTAL AMOUNT OF THIS INVOICE:	\$3,326.40
PRIOR BALANCE:	\$39,873.71
TOTAL BALANCE DUE:	\$43,200.11

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 10954 For Services Rendered Through: January 31, 2015

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,326.40	\$6,588.86	\$6,136.13	\$9,043.57	\$18,105.15

March 06, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11000 For Services Rendered Through: February 28, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
02/02/2015	AGH	Finish drafting arbitration complaint/statement of facts; Email draft of arbitration complaint to client for comment/approval.	3.10 759.50
02/03/2015	JAG	Further edits to written discovery to Joel Just; review file in preparation of sending third party subpoenas regarding same.	0.80 236.00
02/03/2015	NDV	Finalize and serve written discovery to defendant Joel Just.	0.50 75.00
02/03/2015	AGH	Review and revise written discovery requests to defendants Joel Just and Eagle Rock Asset Management; supplement to include recent information on NAS.	3.10 759.50
02/04/2015	NDV	Finalize and serve discovery to defendant Eagle Rock Asset Management, LLC.	0.42 62.50
02/18/2015	AGH	Confer with Mr. Gutierrez re: David Swenson's new employment with Defendant Eagle Rock; Review Injunction to assess violation pertaining to contact with First 100 employees by Defendants.	0.30 73.50
02/18/2015	JAG	Review recent issues and documents related to Eagle Rock hiring First 100 employees; begin outlining issues for OSC for violation of injunction.	0.80 236.00
02/19/2015	JAG	Confer with counsel for Hale regarding service, arbitration demand, and status of discovery; confer with client regarding case status.	0.70 206.50
02/19/2015	AGH	Exchange emails with David Koch (Hale counsel) re: notice of representation of Hale, and request not to take default without notice; Review Employment Manual Acceptance page and wage info for Swenson and Davie.	0.30 73.50

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11000 For Services Rendered Through: February 28, 2015

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		<u>Hours</u>	<u>Amount</u>
02/23/2015	AGH Review email from Zach Takos (Just and ERAM counsel) re: deposition of Just.	0.10	N/C
02/24/2015	NDV Draft, finalize, and serve notice of taking videotaped deposition of defendant Joel Just.	0.40	60.00
02/25/2015	JAG Review issues for OSC and begin outlining motion for same; revise and edit deposition notices for PMK and prepare SAO for arbitration of Hale claims.	1.50	442.50
02/25/2015	NDV Finalize and serve notice of taking deposition of PMK of Eagle Rock Asset Management.	0.40	60.00
PROFESSIONAL SERVICES RENDERED:		12.42	\$3,044.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	3.80	295.00	\$1,121.00
Ashley G. Hanks	6.80	245.00	\$1,666.00
Ashley G. Hanks	0.10	0.00	\$0.00
Natalie D. Vazquez	1.72	150.00	\$257.50

CLIENT COSTS ADVANCED

02/28/2015	Copies/Prints	19.60
02/28/2015	Color Copies/Prints	N/C
02/28/2015	Facsimile	N/C
02/28/2015	Delivery Services/Courier - Special	62.00
02/28/2015	Delivery Services/Courier - Standard	10.00
CLIENT COSTS ADVANCED:		\$91.60

INTEREST ON PRIOR BALANCE:	\$367.06
TOTAL AMOUNT OF THIS INVOICE:	\$3,503.16
PRIOR BALANCE:	\$43,200.11
TOTAL BALANCE DUE:	\$46,703.27

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11000 For Services Rendered Through: February 28, 2015

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,829.56	\$6,588.86	\$0.00	\$6,136.13	\$27,148.72

April 07, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11216 For Services Rendered Through: March 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
03/02/2015	JAG	Revise and edit SAO for arbitration of Hale claims; confer with counsel regarding filing of same.	0.70 206.50
03/02/2015	AGH	Review stipulation and order to remove claims against Hale to arbitration.	0.10 24.50
03/03/2015	AGH	Review email exchange re: stipulation language pertaining to payment of fees and costs of arbitration.	0.20 49.00
03/10/2015	AGH	Draft Arbitration complaint against Hale and Just; Email client re: approval of Arbitration complaint.	2.10 514.50
03/11/2015	AGH	Exchange emails with client re: [REDACTED] arbitration complaint; Revise arbitration complaint [REDACTED]	0.80 196.00
03/11/2015	CMB	File stipulation and order to remove claims to arbitration.	0.10 15.00
03/12/2015	JAG	Revise arbitration complaint and form for submission.	0.50 147.50
03/12/2015	CMB	Draft, file and serve notice of entry of stipulation and order to remove claims to arbitration; open case in American Arbitration Association; confer with Mr. Gutierrez regarding same.	1.00 150.00
03/14/2015	JAG	Review defendants' responses to written discovery; confer with client regarding case plan.	1.00 295.00
03/16/2015	AGH	Review Just and Eagle Rock written discovery responses.	0.80 196.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11216 For Services Rendered Through: March 31, 2015

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			<u>Hours</u>	<u>Amount</u>
03/18/2015	AGH	Review correspondence from American Arbitration Association relating to initiation of arbitration.	0.10	24.50
03/19/2015	JAG	Email counsel in Idaho regarding documents from the JustMed v. Byce case; review case file in preparation of gaining information for instant litigation.	1.00	295.00
03/19/2015	AGH	Meet with client re: Motion for Order to Show Cause; Research contact information for Shelley Shannahan, Esq.; Draft Motion for Order to Show Cause, Declaration of client in support thereof, and proposed Order.	3.30	808.50
03/23/2015	CMB	Finalize, file and serve motion for order to show cause.	0.40	60.00
03/23/2015	AGH	Confer with Mr. Gutierrez re: case strategy; Review client's requested modifications to Motion; Revise Motion for Order to Show Cause; Revise Client's declaration in support of Motion for Order to Show Cause.	2.80	686.00
03/24/2015	JAG	Review discovery responses for 2.34 conference and in preparation of deposition of Just.	0.80	236.00
03/24/2015	AGH	Exchange emails with client re: Motion for Order to Show Cause.	0.20	49.00
03/27/2015	AGH	Confer with Mr. Gutierrez re: preparation for deposition of Just.	0.10	24.50
03/31/2015	JAG	Phone calls and emails with Idaho attorney for JustMed litigation regarding case facts; testimony of Just and obtaining deposition and trial testimony.	0.80	236.00
PROFESSIONAL SERVICES RENDERED:			16.80	\$4,213.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	4.80	295.00	\$1,416.00
Ashley G. Hanks	10.50	245.00	\$2,572.50
Charity M. Barber	1.50	150.00	\$225.00

CLIENT COSTS ADVANCED

03/12/2015	Arbitrators/Mediators:	3,500.00
	American Arbitration Association	
03/31/2015	Facsimile	N/C

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11216 For Services Rendered Through: March 31, 2015

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	<u>Amount</u>
03/31/2015 Copies/Prints	22.75
03/31/2015 Color Copies/Prints	N/C
03/31/2015 Postage	0.48
03/31/2015 Postage	2.38
03/31/2015 Court Fees	3.50
03/31/2015 Court Fees	3.50
03/31/2015 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$3,536.11

INTEREST ON PRIOR BALANCE:	\$439.25
TOTAL AMOUNT OF THIS INVOICE:	\$8,188.86
PRIOR BALANCE:	\$46,703.27
TOTAL BALANCE DUE:	\$54,892.13

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$8,188.86	\$6,829.56	\$0.00	\$6,588.86	\$33,284.85

May 08, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11555 For Services Rendered Through: April 30, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
04/02/2015	JAG Research elements for each claim asserted and facts needed in preparation of the deposition of Joel Just; continue to draft detailed outline for deposition testimony and gather exhibits.	2.80	826.00
04/06/2015	JAG Continue to review discovery responses and documents produced in preparation of conducting the deposition of Joel Just; revise and edit outline for deposition.	1.50	442.50
04/07/2015	JAG Continue to review discovery responses and emails from Just; draft timeline and overview of email production and confer with clients regarding case plan.	1.80	531.00
04/08/2015	JAG Review final portion of email production and documents produced by client for deposition of Joel Just and further discovery; revise and edit timeline and questions for deposition.	2.50	737.50
04/09/2015	JAG Final revisions to outline for deposition of Joel Just; continue to review and organize exhibits in support of same.	2.20	649.00
04/09/2015	CMB Confer with Ms. Hanks and Mr. Gutierrez regarding AAA payment and service of complaint; serve complaint; draft and serve certificate of same.	0.30	45.00
04/09/2015	AGH Review arbitration rules and evaluate compliance with initial stages and consequences for nonresponse from Defendants.	0.40	98.00
04/10/2015	NDV Gather exhibits for the depositions of defendants Joel Just and PMK of Eagle Rock for Mr. Gutierrez.	0.80	120.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11555 For Services Rendered Through: April 30, 2015

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		Hours	Amount
04/14/2015	JAG	Conduct final preparation for the deposition of Joel Just; conduct morning session of deposition of Mr. Just; confer with client during break regarding same.	6.50 1,917.50
04/14/2015	JAG	Conduct afternoon session of the deposition of Mr. Just; confer with client following deposition regarding case plan and strategy for continued deposition; review testimony for reply in support of order to show cause against Just.	4.20 1,239.00
04/16/2015	JAG	Continue drafting reply brief in support of order to show cause why defendants should not be held in contempt.	1.50 442.50
04/17/2015	DJB	Meet with Mr. Gutierrez to discuss Reply to Motion for an Order to Show Cause; review the relevant pleadings on file; review the Lasala TRO pleadings for comparison; Westlaw research on lack of bond requirement; Westlaw research on soliciting competing information through hiring a former employee; continue the working draft of Intro, add to the legal analysis; save to the file for review.	5.60 1,092.00
04/20/2015	JAG	Review and edit reply brief in support of order to show cause.	0.80 236.00
04/20/2015	NDV	Draft, finalize, and serve plaintiff's first supplement to disclosures; Gather exhibits, finalize, and file reply in support of motion for order to show cause.	0.80 120.00
04/20/2015	DJB	Complete draft of Reply Brief in Support of Motion for Order to Show Cause; add to argument that the injunction is valid despite lack of bond order and its terms are clear. Edit, send to Mr. Gutierrez and help incorporate exhibits for filing.	2.00 390.00
04/20/2015	AGH	Review and revise draft of Reply in support of Motion for Order To Show Cause; Review and revise first supplemental disclosure of documents.	0.80 196.00
04/23/2015	NDV	Prepare binder for Mr. Gutierrez for plaintiffs motion for an order to show cause why sanctions should not be issued to defendants.	0.50 75.00
04/26/2015	JAG	Review pleadings and case law cited in preparation of attending hearing on order to show cause.	1.00 295.00
04/27/2015	JAG	Draft outline of argument on order to show cause; attend hearing on order to show cause; confer with opposing counsel following same regarding scope of order on ruling and Preliminary Injunction order for bond decision.	2.50 737.50
04/29/2015	AGH	Draft order denying motion for order to show cause and amended order granting preliminary injunction; Email Zach Takos (Just counsel) re: proposed orders.	1.20 294.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11555 For Services Rendered Through: April 30, 2015

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	<u>Hours</u>	<u>Amount</u>
PROFESSIONAL SERVICES RENDERED:	39.70	\$10,483.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	27.30	295.00	\$8,053.50
Ashley G. Hanks	2.40	245.00	\$588.00
Danielle J. Barraza	7.60	195.00	\$1,482.00
Charity M. Barber	0.30	150.00	\$45.00
Natalie D. Vazquez	2.10	150.00	\$315.00

CLIENT COSTS ADVANCED

04/30/2015 Delivery Services/Courier - Special	20.00
04/30/2015 Facsimile	N/C
04/30/2015 Copies/Prints	398.65
04/30/2015 Color Copies/Prints	0.65
04/30/2015 Postage	4.06
04/30/2015 Court Fees	3.50

CLIENT COSTS ADVANCED:	\$426.86
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INTEREST ON PRIOR BALANCE:	\$460.64
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TOTAL AMOUNT OF THIS INVOICE:	\$11,371.00
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PRIOR BALANCE:	\$54,892.13
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TOTAL BALANCE DUE:	\$66,263.13
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AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$11,371.00	\$8,188.86	\$6,829.56	\$0.00	\$39,873.71

June 05, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11611 For Services Rendered Through: May 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
05/06/2015	JAG Review and respond to emails with opposing counsel regarding discovery and edits to pending orders.	0.40	118.00
05/06/2015	AGH Exchange emails from Zack Takos re: orders on motion for order to show cause and granting preliminary injunction; Revise orders on motion for order to show cause and granting preliminary injunction.	0.40	98.00
05/12/2015	CMB Confer with Mr. Gutierrez regarding orders submitted to court; file order denying motion for order to show cause and amended order on application for preliminary injunction.	0.20	30.00
05/12/2015	JAG Review pending order on TRO; review issues and ensure that bond is posted for injunction; review issues for re-filing OSC.	0.80	236.00
05/13/2015	CMB Draft, file and serve notice of entry order denying motion for order to show cause and notice of entry of amended order on application for preliminary injunction.	0.40	60.00
05/20/2015	CMB Draft, file and serve notice of posting bond.	0.20	30.00
PROFESSIONAL SERVICES RENDERED:		2.40	\$572.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.20	295.00	\$354.00
Ashley G. Hanks	0.40	245.00	\$98.00
Charity M. Barber	0.80	150.00	\$120.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11611 For Services Rendered Through: May 31, 2015

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
05/06/2015 Deposition Transcripts 200349/Bloom, Mr. Jay /Invoice#17669 Check # 10950	1,250.00
05/06/2015 Deposition Transcripts 200349/Bloom, Mr. Jay /Invoice#17667 Check # 10951	1,603.05
05/17/2015 Court Fees 200349/Bloom, Mr. Jay /A-14-705993-B preliminary injunction bond Check # 10965	7,500.00
05/31/2015 Delivery Services/Courier - Standard	10.00
05/31/2015 Facsimile	N/C
05/31/2015 Color Copies/Prints	N/C
05/31/2015 Copies/Prints	12.60
05/31/2015 Court Fees	3.50
05/31/2015 Court Fees	3.50
05/31/2015 Court Fees	3.50
05/31/2015 Court Fees	3.50
05/31/2015 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$10,393.15

INTEREST ON PRIOR BALANCE: **\$563.19**

TOTAL AMOUNT OF THIS INVOICE: **\$11,528.34**

PRIOR BALANCE: **\$66,263.13**

TOTAL BALANCE DUE: **\$77,791.47**

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$11,528.34	\$11,371.00	\$8,188.86	\$3,503.16	\$43,200.11

July 09, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11844 For Services Rendered Through: June 30, 2015

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
06/03/2015 NDV Send deposition transcript of Joel Just to Mr. Bloom.	0.10	N/C
06/04/2015 CMB Telephone conference with AAA case manager regarding flexible fee schedule; confer with Mr. Gutierrez regarding same; submit credit card authorization for payment of proceed fee.	0.20	30.00
06/25/2015 JAG Review file and participate in teleconference with opposing counsel and AAA arbitrator; review scheduling issues and discovery following same.	1.50	442.50
PROFESSIONAL SERVICES RENDERED:	1.80	\$472.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.50	295.00	\$442.50
Charity M. Barber	0.20	150.00	\$30.00
Natalie D. Vazquez	0.10	0.00	\$0.00

CLIENT COSTS ADVANCED

06/02/2015 Litigation support vendors 200349/Bloom, Mr. Jay /Invoice# 89383 Check # 10998	246.47
06/19/2015 Arbitrators/Mediators American Arbitration Association	8,200.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11844 For Services Rendered Through: June 30, 2015

Page No. 2

	<u>Amount</u>
06/30/2015 Delivery Services/Courier - Special	12.00
06/30/2015 Delivery Services/Courier - Standard	10.00
06/30/2015 Copies/Prints	0.35
06/30/2015 Color Copies/Prints	N/C
06/30/2015 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$8,468.82

INTEREST ON PRIOR BALANCE:	\$653.55
TOTAL AMOUNT OF THIS INVOICE:	\$9,594.87
PRIOR BALANCE:	\$77,791.47
TOTAL BALANCE DUE:	\$87,386.34

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$9,594.87	\$11,528.34	\$11,371.00	\$8,188.86	\$46,703.27



MAIER GUTIERREZ AYON PLLC
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Las Vegas, NV 89101
702.629.7900

August 05, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 11965 For Services Rendered Through: July 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
07/01/2015 NDV	Draft and send e-mail regarding third party witness to be deposed David Swenson to Mr. Gutierrez.	0.10	15.00
07/06/2015 NDV	Draft, finalize, and serve deposition notice of David Swenson.	0.50	75.00
07/06/2015 JAG	Review and respond to emails from opposing counsel regarding depositions of David Swenson; outline issues for same.	1.00	295.00
07/14/2015 CMB	Confer with Mr. Gutierrez regarding conflict checklist and list of arbitrators; email correspondence with AAA regarding same.	0.20	30.00
07/28/2015 JAG	Review emails from AAA regarding appointment of arbitrator and issues for discovery.	0.40	118.00
PROFESSIONAL SERVICES RENDERED:		2.20	\$533.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.40	295.00	\$413.00
Charity M. Barber	0.20	150.00	\$30.00
Natalie D. Vazquez	0.60	150.00	\$90.00

INTEREST ON PRIOR BALANCE: \$795.99

TOTAL AMOUNT OF THIS INVOICE: \$1,328.99

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 11965 For Services Rendered Through: July 31, 2015

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	Amount
PRIOR BALANCE:	\$87,386.34
TOTAL BALANCE DUE:	\$88,715.33

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$1,328.99	\$9,594.87	\$11,528.34	\$11,371.00	\$54,892.13

September 08, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12195 For Services Rendered Through: August 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
08/04/2015	DJB Meet with Mr. Gutierrez to discuss subpoenas for James Coyne Robert Colgan, Colgan Financial Group, and XRiver Properties; review pleadings and Joel Just deposition; draft out of state SDT's, notices of deposition, application for issuance of subpoenas, and commission to take depositions outside state of NV.	3.80	741.00
08/05/2015	NDV Confer with Ms. Barranza regarding out of state subpoena duces tecum to witnesses.	0.50	75.00
08/05/2015	DJB Meet with Ms. Vasquez to discuss SDTs; meet with Mr. Gutierrez to discuss SDTs and ability to serve in-state subpoenas on XRiver Properties; incorporate changes to SDTs and save to file.	0.80	156.00
08/06/2015	JAG Revise and edit subpoenas to Colgan and Coyne; review scope of subpoenas and documents to request.	1.00	295.00
08/06/2015	DJB Incorporate Mr. Gutierrez's additions to the SDT's for Colgan, Colgan Financial, XRiver Properties, and Coyne.	0.20	39.00
08/10/2015	NDV Confer and coordinate with court reporter to schedule four depositions and for locations in Connecticut for subpoena duces tecum to Robert Colgan, James Coyne, and COR of Colgan Financial Group; Finalize and serve notice of deposition of COR of XRiver Properties; Revise subpoena duces tecum and deposition notices with date and times and deposition location for Robert Colgan, James Coyne, and COR of Colgan Financial Group.	2.50	375.00
08/10/2015	JAG Review AAA employment rules and letter regarding initial conference call with the parties; begin outlining overview of discovering deadlines and case plan.	1.00	295.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12195 For Services Rendered Through: August 31, 2015

Page No. 2

		Hours	Amount
08/11/2015	NDV	Finalize, e-file, and serve application for issuance of subpoena for Robert Colgan, James Coyne, and COR of Colgan Financial Group, Inc.	0.60 90.00
08/13/2015	NDV	Follow up with process service for service on subpoena duces tecum to Robert Colgan, James Coyne, and COR of Colgan Financial Group, Inc.	0.40 60.00
08/14/2015	NDV	Finalize and e-file commission to take deposition outside of the state of Nevada for James Coyne, Robert Colgan, and COR of Colgan Financial Group, Inc.; Follow up with process service.	0.70 105.00
08/17/2015	JAG	Prepare for and participate in arbitration conference call with parties' counsel and arbitrator Zucker; outline issues and damages from state court action for same' review and outline discovery from state court action for same.	2.50 737.50
08/20/2015	JAG	Review and respond to X River counsel emails and letter regarding objection to subpoenas; begin outlining motion to compel.	1.30 383.50
08/20/2015	DJB	Review correspondence between counsel and discovery documents in preparation of drafting motion to compel.	1.00 195.00
08/20/2015	CMB	Initial draft of motion to compel production of documents from Xriver Properties, LLC.	0.30 45.00
08/21/2015	NDV	Follow up with process service with process service for the three deponents in Connecticut, Robert Colgan, James Coyne, and COR of Colgan Financial Group, Inc.	0.50 75.00
08/21/2015	JAG	Review written discovery and outline further discovery for arbitration against Hale.	1.00 295.00
08/24/2015	JAG	Confer with X River counsel regarding 2.34 issues and outline further issues for motion to compel.	0.80 236.00
08/24/2015	DJB	Draft the affidavit of counsel in support of OST for the Motion to Compel; review pleadings and draft the introduction and discovery requested sections. Review correspondence and send email to Mr. Gutierrez regarding [REDACTED]	3.00 585.00
08/25/2015	JAG	Confer with counsel for X River regarding subpoena and 2.34 conference; continue to outline issues for motion to compel.	1.00 295.00
08/26/2015	NDV	Follow up with process server regarding attempts to James Coyne, Robert Colgan, and COR of Colgan Financial Group, Inc.; Draft and send email to Mr. Gutierrez regarding the status.	0.50 75.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12195 For Services Rendered Through: August 31, 2015

Page No. 3

	Hours	Amount
08/30/2015 NDV Draft arbitration discovery templates for Mr. Gutierrez.	0.70	105.00
PROFESSIONAL SERVICES RENDERED:	24.10	\$5,258.00

TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	8.60	295.00	\$2,537.00
Danielle J. Barraza	8.80	195.00	\$1,716.00
Charity M. Barber	0.30	150.00	\$45.00
Natalie D. Vazquez	6.40	150.00	\$960.00

CLIENT COSTS ADVANCED

08/31/2015 Copies/Prints	32.55
08/31/2015 Color Copies/Prints	3.90
08/31/2015 Facsimile	N/C
08/31/2015 Deposition Transcripts	448.70
200349/Bloom, Mr. Jay /Invoice# 18729	
Check # 11199	
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
08/31/2015 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$527.15

INTEREST ON PRIOR BALANCE:	\$891.06
TOTAL AMOUNT OF THIS INVOICE:	\$6,676.21
PRIOR BALANCE:	\$88,715.33
TOTAL BALANCE DUE:	\$95,391.54

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12195 For Services Rendered Through: August 31, 2015

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,676.21	\$1,328.99	\$9,594.87	\$11,528.34	\$66,263.13



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702.629.7900

October 07, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12379 For Services Rendered Through: September 30, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
09/01/2015	DJB Review the arbitration pleadings and commence written discovery for Gregg Hale.	0.80	156.00
09/02/2015	JAG Draft and revise written discovery to Defendant Hale; review and revise Plaintiff's initial disclosures for AAA arbitration case; email opposing counsel regarding extension to discovery; being outlining damages for First 100 for disclosure.	2.40	708.00
09/02/2015	NDV Finalize and serve arbitration propounded discovery to Gregg Hale; Draft, finalize and serve second supplement to disclosures in the state case; Confer with Mr. Gutierrez; Draft, finalize, and serve arbitration initial disclosure.	2.60	390.00
09/03/2015	JAG Review and outline damages for updated 16.1 disclosure.	0.60	177.00
09/03/2015	NDV Draft 3rd supplement to disclosures for Mr. Gutierrez edits.	0.20	30.00
09/08/2015	JAG Revise and edit proposed discovery stipulation and order; confer with opposing counsel regarding same.	0.50	147.50
09/08/2015	NDV Draft stipulation and order to extend discovery deadlines and forward to opposing counsel for their review.	1.00	150.00
09/15/2015	NDV Finalize and e-file stipulation and order to extend discovery deadlines.	0.30	45.00
09/16/2015	JAG Review and outline opposition to motion for protective order filed by XRiver, LLC	1.00	295.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12379 For Services Rendered Through: September 30, 2015

Page No. 2

		Hours	Amount
09/16/2015	NDV Draft, finalize, and e-file notice of entry of stipulation and order on first request to extend discovery.	0.50	75.00
09/16/2015	NDV Draft template for opposition and counter-motion to compel.	0.30	45.00
09/17/2015	NDV Draft, finalize, and serve amended notices of out of state production of documents and subpoena duces tecum to James Coyne, Robert Colgan, and PMK of Colgan Financial Group; Confer with court reporter to coordinate for new date; Confer with process server in Connecticut and forward amended subpoena duces tecums with rescheduled date.	2.00	300.00
09/18/2015	SMG Discuss opposition and countermotion with Mr. Gutierrez.	0.30	58.50
09/18/2015	SMG Draft/Revise opposition to motion to quash and countermotion.	4.00	780.00
09/18/2015	SMG Review file in preparation of drafting discovery motions.	1.20	234.00
09/21/2015	NDV Draft interrogatory response template.	1.20	180.00
09/21/2015	NDV Draft the discovery response template to 146 request for production of documents; Confer with opposing counsel to request a two week extension; Draft and send email to opposing counsel requesting the same in writing.	3.00	450.00
09/21/2015	NDV Follow up with process server regarding status of serving deponents James Coyne, Robert Colgan, and PMK of Colgan Financial Group, Inc.; Draft and send email regarding the same to Mr. Gutierrez.	0.40	60.00
09/21/2015	DJB Westlaw, NRS, and NRCP research on whether a third party out of state subpoena can be served on the CT secretary of state when company has been avoiding acceptance of service. Email findings to Mr. Gutierrez.	1.50	292.50
09/22/2015	DJB Further Westlaw research on avoidance of service and substitution of service for the issue on serving subpoena on CT corporation. Email findings to Mr. Gutierrez.	1.20	234.00
09/24/2015	NDV Confer and draft email to opposing counsel for Gregg Hale's deposition availability; Draft email to Mr. Gutierrez regarding status of process service in Connecticut for James Coyne, Robert Colgan, and COR of Colgan Financial Group, Inc.	0.70	105.00
09/25/2015	SMG Draft/Revise opposition and countermotion to compel.	5.00	975.00
09/25/2015	NDV Confer with court reporter regarding production of documents deposition location in Connecticut; Draft, finalize, and serve revised subpoena duces tecums and amended deposition notices for COR of Colgan Financial Group, Inc., Robert Colgan, and James Coyne with new address and deposition location 15 miles from new address;	2.70	405.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12379 For Services Rendered Through: September 30, 2015

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		<u>Hours</u>	<u>Amount</u>
	Forward finalized subpoenas to process service to serve at new address we located.		
09/29/2015	JAG Revise and edit opposition to motion for protective order by XRiver and counter-motion to compel.	1.00	295.00
09/29/2015	SMG Draft/Revise opposition.	2.00	390.00
09/30/2015	JAG Revise and edit opposition to motion for protective order and counter-motion to compel.	1.00	295.00
09/30/2015	NDV Draft, finalize, and serve letter to opposing counsel regarding unilaterally scheduling respondent, Gregg Hale's deposition; Draft and exchange emails with Mr. Gutierrez regarding deposition scheduling; Draft, finalize, and serve notice of deposition to respondent Gregg Hale.	0.90	135.00
PROFESSIONAL SERVICES RENDERED:		38.30	\$7,407.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	6.50	295.00	\$1,917.50
Danielle J. Barraza	3.50	195.00	\$682.50
Stephanie M. Getler	12.50	195.00	\$2,437.50
Natalie D. Vazquez	15.80	150.00	\$2,370.00

CLIENT COSTS ADVANCED

09/30/2015	Delivery Services/Courier - Special	15.00
09/30/2015	Subpoena/Process Fees	79.64
09/30/2015	Postage	5.04
09/30/2015	Postage	0.98
09/30/2015	Court Fees	3.50
09/30/2015	Court Fees	3.50
09/30/2015	Copies/Prints	24.85
09/30/2015	Color Copies/Prints	N/C
09/30/2015	Facsimile	N/C
CLIENT COSTS ADVANCED:		\$132.51

INTEREST ON PRIOR BALANCE: \$875.00

TOTAL AMOUNT OF THIS INVOICE: \$8,415.01

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12379 For Services Rendered Through: September 30, 2015

Page No. 4

	<u>Amount</u>
PRIOR BALANCE:	\$95,391.54
TOTAL BALANCE DUE:	\$103,806.55

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$8,415.01	\$6,676.21	\$1,328.99	\$9,594.87	\$77,791.47

November 12, 2015

Mr. Jay Bloom
 First 100 LLC
 11920 Southern Highlands Pkwy., Suite 200
 Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
 Matter No.: 200349 First 100 v. Just/Hale
 Invoice No.: 12543 For Services Rendered Through: October 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
10/01/2015 NDV	Finalize, gather exhibits, and e-file opposition and counter-motion to non-party XRiver Properties motion to quash SDT.	0.60	90.00
10/01/2015 NDV	Follow up with process server for status of service in Connecticut to Robert Colgan, James Coyne, and COR of Colgan Financial Group, Inc.	0.20	30.00
10/05/2015 NDV	Finalize and serve third supplement.	0.30	45.00
10/06/2015 NDV	Follow-up with process server regarding service to James Coyne, Robert Colgan, and COR of Colgan Financial Group, Inc.; Draft and send email to Mr. Gutierrez to inquire on an investigator.	0.40	60.00
10/13/2015 NDV	Draft, finalize, and serve amended deposition notice for Gregg Hale.	0.50	75.00
10/15/2015 CMJ	Attend court hearing with Mr. Gutierrez.	1.00	N/C
10/15/2015 JAG	Prepare for and attend motion to quash subpoena and for protective order filed by XRiver Properties, LLC.	2.80	826.00
10/15/2015 DJB	Review the Colgan Report from process server regarding service attempts of Robert Colgan in preparation of further service attempts.	0.30	73.50
10/19/2015 NDV	Draft order template for motion to compel.	0.30	45.00
10/19/2015 NDV	Follow-up with Mr. Gutierrez regarding upcoming deposition of COR Robert Colgan, Robert Colgan, and James Coyne; Draft, finalize, and serve notice of vacating for COR Robert Colgan, Robert Colgan, and James Coyne; Contact court reporter in Connecticut to cancel so we do not incur additional fees.	0.80	120.00

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12543 For Services Rendered Through: October 31, 2015

Page No. 2

		Hours	Amount
10/20/2015	CMJ Draft order; Email Mr. Gutierrez	0.20	49.00
10/20/2015	JAG Revise and edit order on motion to compel against XRiver; email counsel regarding timing of document production.	1.00	295.00
10/28/2015	NDV E-file order granting in part and denying in part motion to quash subpoena duces tecum of custodian of records of XRiver Properties, LLC and for protective order; Draft, finalize, and e-file notice of entry of order.	0.40	60.00
10/28/2015	NDV Confer and draft email to opposing counsel to request for their confirmation of Mr. Hale's deposition tomorrow; Confer with court reporter to request a teleconference phone number to dial in for the other opposing counsel Mr. Takos.	0.50	75.00
10/28/2015	JAG Organize documents and exhibits for the deposition of Gregg Hale; review the deposition transcript for Joel Just, email production, and answers to written discovery.	2.50	737.50
10/29/2015	JAG Review documents and draft outline of questions for the deposition of Gregg Hale.	3.00	885.00
10/29/2015	JAG Conduct the deposition of Gregg Hale; review file following same in preparation of drafting arbitration brief and conducting further discovery.	3.50	1,032.50
PROFESSIONAL SERVICES RENDERED:		18.30	\$4,498.50

TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	12.80	295.00	\$3,776.00
Collin M. Jayne	0.20	245.00	\$49.00
Collin M. Jayne	1.00	0.00	\$0.00
Danielle J. Barraza	0.30	245.00	\$73.50
Natalie D. Vazquez	4.00	150.00	\$600.00

CLIENT COSTS ADVANCED

10/06/2015	Litigation support vendors	739.00
	200349/Bloom, Mr. Jay /Out-of-state subpoena duces tecums	
	Check # 11290	
10/31/2015	Delivery Services/Courier - Standard	10.00
10/31/2015	Postage	0.98
10/31/2015	Court Fees	3.50

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12543 For Services Rendered Through: October 31, 2015

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	<u>Amount</u>
10/31/2015 Court Fees	3.50
10/31/2015 Court Fees	3.50
10/31/2015 Copies/Prints	12.60
10/31/2015 Color Copies/Prints	N/C
10/31/2015 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$773.08

INTEREST ON PRIOR BALANCE:	\$1,949.95
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TOTAL AMOUNT OF THIS INVOICE:	\$7,221.53
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PRIOR BALANCE:	\$103,806.55
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TOTAL BALANCE DUE:	\$111,028.08
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$7,221.53	\$8,415.01	\$6,676.21	\$1,328.99	\$87,386.34

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

December 07, 2015

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12590 For Services Rendered Through: November 30, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
11/13/2015 NDV	Prepare, finalize, and serve plaintiff's fourth supplement in state court case and first supplement in arbitration case.	0.80	120.00
11/16/2015 JAG	Review xRiver disclosure and confer with client regarding case plan regarding same.	1.00	295.00
11/18/2015 JAG	Review and edit disclosures for Joel Just arbitration and district court case; reviewing timing of arbitration in light of recent documents and need to add xRiver, LLC as a party.	1.00	295.00
11/19/2015 NDV	Draft, finalize, and serve fifth supplement in state case; Draft and finalize claimants second supplement to initial disclosures.	1.00	150.00
11/20/2015 NDV	Finalize and serve claimants second supplement.	0.20	30.00
11/24/2015 NDV	Draft, finalize, and serve sixth supplement in the state case; Draft, finalize, and serve third supplement in the arbitration case.	0.80	120.00
11/30/2015 CMB	Draft stipulation and order to continue arbitration hearing; confer with Mr. Gutierrez regarding same; email correspondence with opposing counsel regarding same.	0.50	75.00
11/30/2015 NDV	Prepare stipulation and order to continue trial date in the state case.	0.20	30.00
11/30/2015 JAG	Review and respond to emails from arbitrator and AAA regarding continuing arbitration; revise and edit SAO to continue arbitration.	0.80	236.00
PROFESSIONAL SERVICES RENDERED:		6.30	\$1,351.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12590 For Services Rendered Through: November 30, 2015

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TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	2.80	295.00	\$826.00
Charity M. Barber	0.50	150.00	\$75.00
Natalie D. Vazquez	3.00	150.00	\$450.00

CLIENT COSTS ADVANCED

	Amount
11/30/2015 Delivery Services/Courier - Standard	10.00
11/30/2015 Delivery Services/Courier - Standard	10.00
11/30/2015 Postage	2.84
11/30/2015 Postage	4.16
11/30/2015 Postage	1.86
11/30/2015 Copies/Prints	48.65
11/30/2015 Copies/Prints	236.95
11/30/2015 Color Copies/Prints	9.75
11/30/2015 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$324.21

INTEREST ON PRIOR BALANCE:	\$2,047.69
TOTAL AMOUNT OF THIS INVOICE:	\$3,722.90
PRIOR BALANCE:	\$111,028.08
TOTAL BALANCE DUE:	\$114,750.98

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,722.90	\$7,221.53	\$8,415.01	\$6,676.21	\$88,715.33

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

January 07, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12879 For Services Rendered Through: December 31, 2015

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
12/01/2015	JAG Confer with call with parties and AAA arbitrator regarding arbitration extension and issues related to same.	0.70	206.50
12/03/2015	SMG Review/Analyze file to draft motion for leave to amend.	1.20	234.00
12/04/2015	SMG Draft/Revise motion for leave to amend.	2.00	390.00
12/04/2015	SMG Draft/Revise third amended complaint to add XRiver as defendant.	1.80	351.00
12/04/2015	JAG Revise and edit amended complaint to include xRiver and motion for leave to amend.	1.20	354.00
12/07/2015	NDV Communicate with opposing counsel regarding status of the their review and execution of the stipulation and order to continue trial date.	0.30	45.00
12/08/2015	NDV Communicate with opposing counsel to arrange pick up of executed stipulation and order to continue trial date.	0.20	30.00
12/09/2015	NDV Revise stipulation and order to continue trial date per courts edits.	0.30	45.00
12/10/2015	NDV Forward revised stipulation and order to continue trial date to opposing counsel and coordinate pick-up.	0.20	30.00
12/17/2015	NDV Draft, finalize, and serve notice of entry of order to continue trial date.	0.40	60.00
12/23/2015	JAG Revise and edit 3rd amended complaint; revise and supplement motion for leave to amend.	1.50	442.50

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 12879 For Services Rendered Through: December 31, 2015

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		Hours	Amount
12/23/2015 JAG	Research case law in support of 3rd amended complaint and basis for granting amendment at this stage of case.	0.50	147.50
12/23/2015 NDV	Finalize and file plaintiff's motion for leave to file third amended complaint.	0.30	45.00
PROFESSIONAL SERVICES RENDERED:		10.60	\$2,380.50

TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	3.90	295.00	\$1,150.50
Stephanie M. Getler	5.00	195.00	\$975.00
Natalie D. Vazquez	1.70	150.00	\$255.00

CLIENT COSTS ADVANCED

12/31/2015 Copies/Prints	N/C
12/31/2015 Color Copies/Prints	N/C
12/31/2015 Facsimile	0.15
12/31/2015 Court Fees	3.50
12/31/2015 Court Fees	3.50
12/31/2015 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$10.65

INTEREST ON PRIOR BALANCE:	\$2,265.60
TOTAL AMOUNT OF THIS INVOICE:	\$4,656.75
PRIOR BALANCE:	\$114,750.98
TOTAL BALANCE DUE:	\$119,407.73

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,656.75	\$3,722.90	\$7,221.53	\$8,415.01	\$95,391.54

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 12879 For Services Rendered Through: December 31, 2015

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All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

February 08, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13053 For Services Rendered Through: January 31, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
01/12/2016	SMG Review/Analyze opposition to motion for leave to amend.	1.00	195.00
01/12/2016	SMG Draft/Revise reply to opposition to motion for leave to amend.	1.50	292.50
01/14/2016	SMG Draft/Revise reply in support of motion for leave to file third amended complaint.	6.00	1,170.00
01/19/2016	NDV Gather exhibits; Finalize and e-file reply in support of motion for leave to file third amended complaint.	0.50	75.00
01/19/2016	JAG Revise and edit reply brief for motion for leave to amend.	1.00	295.00
01/25/2016	NDV Draft order granting plaintiff's motion for leave to file third amended complaint and forward to opposing counsel to approve as to form and content.	0.50	75.00
01/25/2016	JAG Prepare for and attend hearing on motion for leave to amend; draft outline of argument; draft proposed order following same.	3.50	1,032.50
01/28/2016	JAG Revise and edit discovery responses and objections for overdue written discovery; email client regarding same.	3.50	1,032.50
01/29/2016	JAG Review case plan and issues for discovery now that xRiver has been added as a defendant.	1.20	354.00
PROFESSIONAL SERVICES RENDERED:		18.70	\$4,521.50

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13053 For Services Rendered Through: January 31, 2016

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TIMEKEEPER SUMMARY

Name	Hours	Rate	Amount
Joseph A. Gutierrez	9.20	295.00	\$2,714.00
Stephanie M. Getler	8.50	195.00	\$1,657.50
Natalie D. Vazquez	1.00	150.00	\$150.00

CLIENT COSTS ADVANCED

	Amount
01/31/2016 Delivery Services/Courier - Special	37.00
01/31/2016 Delivery Services/Courier - Special	12.00
01/31/2016 Delivery Services/Courier - Standard	10.00
01/31/2016 Delivery Services/Courier - Standard	10.00
01/31/2016 Court Fees	3.50
01/31/2016 Copies/Prints	27.65
01/31/2016 Copies/Prints	22.75
01/31/2016 Color Copies/Prints	N/C
01/31/2016 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$122.90

INTEREST ON PRIOR BALANCE:	\$2,342.10
TOTAL AMOUNT OF THIS INVOICE:	\$6,986.50
PRIOR BALANCE:	\$119,407.73
TOTAL BALANCE DUE:	\$126,394.23

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,986.50	\$4,656.75	\$3,722.90	\$7,221.53	\$103,806.55

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

March 09, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13212 For Services Rendered Through: February 29, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
02/10/2016	JAG Coordinate continuance of arbitration and confer with AAA staff regarding same.	0.80	236.00
02/20/2016	JAG Review and edit 3rd amended complaint in preparation of filing; review status of discovery following same.	0.80	236.00
02/21/2016	NDV Draft, finalize, and file notice of entry of order granting motion to file third amended complaint.	0.40	60.00
02/22/2016	NDV Finalize and file third amended complaint; Draft and finalize summons to XRiver Properties, LLC.	0.40	60.00
02/29/2016	CMB Confer with Mr. Gutierrez regarding letter to court to vacate calendar call; draft and serve same; email correspondence to opposing counsel regarding same; draft stipulation and order to vacate and reset trial date.	0.60	90.00

PROFESSIONAL SERVICES RENDERED:

3.00 \$682.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.60	295.00	\$472.00
Charity M. Barber	0.60	150.00	\$90.00
Natalie D. Vazquez	0.80	150.00	\$120.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13212 For Services Rendered Through: February 29, 2016

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CLIENT COSTS ADVANCED

	<u>Amount</u>
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11698	139.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11699	139.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /Locate James Coyne Check # 11700	185.00
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11701	159.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11702	159.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11703	204.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /SDT prep and attempted service Check # 11705	204.50
02/24/2016 Subpoena/Process Fees 200349/Bloom, Mr. Jay /Locate Robert Colgan Check # 11706	185.00
02/29/2016 Delivery Services/Courier - Standard	10.00
02/29/2016 Copies/Prints	13.30
02/29/2016 Color Copies/Prints	N/C
02/29/2016 Facsimile	N/C
02/29/2016 Court Fees	3.50
02/29/2016 Court Fees	3.50
02/29/2016 Court Fees	3.50
CLIENT COSTS ADVANCED:	<u>\$1,410.80</u>

INTEREST ON PRIOR BALANCE: **\$2,276.93**

TOTAL AMOUNT OF THIS INVOICE: **\$4,369.73**

PRIOR BALANCE: **\$126,394.23**

TOTAL BALANCE DUE: **\$130,763.96**

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 13212 For Services Rendered Through: February 29, 2016

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$11,356.23	\$0.00	\$4,656.75	\$3,722.90	\$111,028.08

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

April 11, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13333 For Services Rendered Through: March 31, 2016

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
03/01/2016 CMB Email correspondence to opposing counsel regarding stipulation and order to vacate and reset trial date.	0.10	15.00
03/07/2016 CMB File stipulation and order to vacate and reset trial date.	0.10	15.00
03/09/2016 NDV Finalize and file summons issued to XRiver Properties.	0.20	30.00
03/14/2016 CMB Draft, file and serve notice of entry of stipulation and order to reset and vacate trial.	0.20	30.00
03/24/2016 JAG Review and respond to emails from defense counsel regarding overdue discovery and upcoming deadlines; confer with client regarding same.	0.50	147.50
PROFESSIONAL SERVICES RENDERED:	1.10	\$237.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	0.50	295.00	\$147.50
Charity M. Barber	0.40	150.00	\$60.00
Natalie D. Vazquez	0.20	150.00	\$30.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13333 For Services Rendered Through: March 31, 2016

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CLIENT COSTS ADVANCED

	<u>Amount</u>
03/31/2016 Delivery Services/Courier - Special	12.00
03/31/2016 Delivery Services/Courier - Standard	10.00
03/31/2016 Court Fees	3.50
03/31/2016 Court Fees	3.50
03/31/2016 Court Fees	3.50
03/31/2016 Copies/Prints	1.05
03/31/2016 Color Copies/Prints	N/C
03/31/2016 Facsimile	0.15
CLIENT COSTS ADVANCED:	\$33.70

INTEREST ON PRIOR BALANCE:	\$2,574.64
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TOTAL AMOUNT OF THIS INVOICE:	\$2,845.84
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PRIOR BALANCE:	\$130,763.96
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TOTAL BALANCE DUE:	\$133,609.80
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$2,845.84	\$4,369.73	\$6,986.50	\$4,656.75	\$114,750.98

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

May 16, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13631 For Services Rendered Through: April 30, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
04/01/2016	KEF Draft/Revise Opposition to P Motion to Dismiss/Motion for Summary Judgment.	2.50	487.50
04/04/2016	SMG Draft/Revise opposition to motion to dismiss / MSJ	4.80	936.00
04/08/2016	SMG Draft/Revise opposition to mtd / msj.	2.70	526.50
04/08/2016	JAG Review and edit opposition to Xriver's motion to dismiss and MSJ; revise and edit declaration; confer with client regarding same; review emails from arbitration office regarding case costs and canceling hearing.	3.50	1,032.50
04/11/2016	NDV Gather exhibits; Finalize and file opposition to defendant's motion to dismiss or in the alternative motion for summary judgment.	0.60	90.00
04/18/2016	CMB Finalize and serve letter to AAA regarding payment of outstanding fees.	0.20	30.00
04/22/2016	JAG Review documents in preparation of hearing on XRiver's MSJ; draft outline of argument for same.	2.80	826.00
04/25/2016	JAG Revise outline for argument and attend hearing on XRiver's MSJ; confer with client regarding same; email opposing counsel regarding settlement offer.	2.50	737.50

PROFESSIONAL SERVICES RENDERED:

19.60 \$4,666.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	8.80	295.00	\$2,596.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13631 For Services Rendered Through: April 30, 2016

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Name	Hours	Rate	Amount
Katherine E. Frank	2.50	195.00	\$487.50
Stephanie M. Getler	7.50	195.00	\$1,462.50
Charity M. Barber	0.20	150.00	\$30.00
Natalie D. Vazquez	0.60	150.00	\$90.00

CLIENT COSTS ADVANCED

	Amount
04/30/2016 Delivery Services/Courier - Special	12.00
04/30/2016 Subpoena/Process Fees	49.50
04/30/2016 Court Fees	3.50
04/30/2016 Copies/Prints	11.55
04/30/2016 Color Copies/Prints	N/C
04/30/2016 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$76.55

INTEREST ON PRIOR BALANCE:	\$2,579.45
TOTAL AMOUNT OF THIS INVOICE:	\$7,322.00
PRIOR BALANCE:	\$133,609.80
TOTAL BALANCE DUE:	\$140,931.80

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$7,322.00	\$2,845.84	\$4,369.73	\$6,986.50	\$119,407.73

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

June 08, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13670 For Services Rendered Through: May 31, 2016

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
05/02/2016 NDV Draft, finalize, and serve seventh supplement; Revise request for production of documents responses, finalize, and serve.	2.70	607.50
PROFESSIONAL SERVICES RENDERED:	2.70	\$607.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Natalie D. Vazquez	2.70	225.00	\$607.50

CLIENT COSTS ADVANCED

05/31/2016 Deposition Transcripts 200349/Bloom, Mr. Jay /Invoice# 19594 Check # 11987	824.75
05/31/2016 Deposition Transcripts 200349/Bloom, Mr. Jay /Invoice#19594 Check # 11995	907.23
05/31/2016 Delivery Services/Courier - Standard	10.00
CLIENT COSTS ADVANCED:	\$1,741.98

INTEREST ON PRIOR BALANCE: **\$2,728.26**

TOTAL AMOUNT OF THIS INVOICE: **\$5,077.74**

Client No.: 2002 Mr. Jay Bloom

Matter No.: 200349 First 100 v. Just/Hale

Invoice No.: 13670 For Services Rendered Through: May 31, 2016

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	<u>Amount</u>
PRIOR BALANCE:	\$140,931.80
TOTAL BALANCE DUE:	\$146,009.54

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$5,077.74	\$7,322.00	\$2,845.84	\$4,369.73	\$126,394.23

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

July 11, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13959 For Services Rendered Through: June 30, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
06/13/2016	DJB Review, analyze and annotate the Memorandum of Costs and Disbursements in preparation of drafting the Motion to Retax.	0.10	32.50
06/20/2016	NDV Gather exhibits; Finalize and file plaintiffs' motion to retax.	0.50	112.50
06/20/2016	DJB Prepare Plaintiffs' Motion to Retax, including Introduction, Legal Argument, and Conclusion sections; incorporate statutory and Westlaw research. Edit and send to Mr. Gutierrez for approval and Ms. Vazquez for filing.	2.20	715.00
06/20/2016	JAG Review and edit motion to retax; confer with Ms. Barazza regarding argument for pending motions; confer with client regarding same.	1.20	450.00
06/24/2016	DJB Review the Opposition to Plaintiff's Motion to Retax in preparation of drafting the Reply brief.	0.10	32.50
06/27/2016	DJB Commence initial draft of the reply brief in support of the motion to retax.	0.20	65.00
PROFESSIONAL SERVICES RENDERED:		4.30	\$1,407.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.20	375.00	\$450.00
Danielle J. Barraza	2.60	325.00	\$845.00
Natalie D. Vazquez	0.50	225.00	\$112.50

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 13959 For Services Rendered Through: June 30, 2016

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CLIENT COSTS ADVANCED

	<u>Amount</u>
06/30/2016 Copies/Prints	8.75
06/30/2016 Color Copies/Prints	N/C
06/30/2016 Facsimile	N/C
06/30/2016 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$12.25

INTEREST ON PRIOR BALANCE:	\$2,780.02
TOTAL AMOUNT OF THIS INVOICE:	\$4,199.77
PRIOR BALANCE:	\$146,009.54
TOTAL DISCOUNT:	(\$824.75)
TOTAL BALANCE DUE:	\$149,384.56

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,199.77	\$4,252.99	\$7,322.00	\$2,845.84	\$130,763.96

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

August 15, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14024 For Services Rendered Through: July 31, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
7/14/2016 NDV	Finalize and file plaintiff's reply in support of motion to retax.	0.20	45.00
7/14/2016 DJB	Prepare the Reply in support of motion to retax; email to Mr. Gutierrez for review and Ms. Vazquez for filing.	0.80	260.00
7/17/2016 CMJ	Draft, file and serve notice of change of address of attorney.	0.20	45.00
7/21/2016 DJB	Prepare for hearing on motion to retax; print and organize relevant pleadings; attend hearing and return to office; brief Mr. Gutierrez on the hearing.	1.30	422.50
7/27/2016 DJB	Review opposing party's proposed Order on Motion to Retax Costs; send response email back to opposing counsel's office regarding changes to be made.	0.20	65.00

PROFESSIONAL SERVICES RENDERED:

2.70 \$837.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	2.30	325.00	\$747.50
Charity M. Johnson	0.20	225.00	\$45.00
Natalie D. Vazquez	0.20	225.00	\$45.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14024 For Services Rendered Through: July 31, 2016

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
7/31/2016 Delivery Services/Courier - Standard	10.00
7/31/2016 Copies/Prints	15.05
7/31/2016 Color Copies/Prints	N/C
7/31/2016 Facsimile	N/C
7/31/2016 Court Fees	3.50
7/31/2016 Court Fees	3.50
CLIENT COSTS ADVANCED:	<u>\$32.05</u>

INTEREST ON PRIOR BALANCE:	\$2,962.14
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TOTAL AMOUNT OF THIS INVOICE:	\$3,831.69
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PRIOR BALANCE:	\$149,384.56
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TOTAL BALANCE DUE:	<u>\$153,216.25</u>
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AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$3,831.69	\$4,199.77	\$4,252.99	\$7,322.00	\$133,609.80

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

PLEASE NOTE OUR NEW MAILING AND BUSINESS ADDRESS



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

September 19, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14336 For Services Rendered Through: August 31, 2016

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
8/1/2016	DJB Review opposing counsel's revised Order Denying Motion to Retax and send additional edits to Ms. Vazquez.	0.10	32.50
8/2/2016	NDV Communicate with opposing counsel regarding edits to order on motion to retax costs; Finalize order and mail original to opposing counsel.	0.30	67.50
8/22/2016	NDV Draft template letter to arbitrator.	0.10	22.50
8/23/2016	NDV Finalize letter to arbitrator, mail, and email all four parties.	0.60	135.00
8/23/2016	JAG Draft letter on motion to arbitrator to move hearing date; draft email to AAA regarding same.	1.30	487.50
PROFESSIONAL SERVICES RENDERED:		2.40	\$745.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.30	375.00	\$487.50
Danielle J. Barraza	0.10	325.00	\$32.50
Natalie D. Vazquez	1.00	225.00	\$225.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14336 For Services Rendered Through: August 31, 2016

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
8/31/2016 Delivery Services/Courier - Standard	10.00
8/31/2016 Postage	0.47
8/31/2016 Postage	48.64
8/31/2016 Copies/Prints	81.90
8/31/2016 Color Copies/Prints	N/C
8/31/2016 Facsimile	N/C
CLIENT COSTS ADVANCED:	<u>\$141.01</u>

INTEREST ON PRIOR BALANCE:	\$3,047.51
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TOTAL AMOUNT OF THIS INVOICE:	\$3,933.52
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PRIOR BALANCE:	\$153,216.25
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TOTAL BALANCE DUE:	<u>\$157,149.77</u>
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AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$3,933.52	\$3,831.69	\$4,199.77	\$4,252.99	\$140,931.80

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

PLEASE NOTE OUR NEW MAILING AND BUSINESS ADDRESS



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

October 12, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14437 For Services Rendered Through: September 30, 2016

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
9/27/2016 SGC Email arbitrators regarding August 24, 2016 order.	0.30	97.50
PROFESSIONAL SERVICES RENDERED:	0.30	\$97.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stephen G. Clough	0.30	325.00	\$97.50

CLIENT COSTS ADVANCED

9/6/2016 Local travel/parking	6.00
9/30/2016 Copies/Prints	1.05
9/30/2016 Color Copies/Prints	N/C
9/30/2016 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$7.05

INTEREST ON PRIOR BALANCE:	\$3,022.35
TOTAL AMOUNT OF THIS INVOICE:	\$3,126.90
PRIOR BALANCE:	\$157,149.77

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14437 For Services Rendered Through: September 30, 2016

Page No. 2

TOTAL BALANCE DUE:

\$160,276.67

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,126.90	\$3,933.52	\$3,831.69	\$4,199.77	\$145,184.79

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

PLEASE NOTE OUR NEW MAILING AND BUSINESS ADDRESS



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

November 04, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14736 For Services Rendered Through: October 31, 2016

	Amount
INTEREST ON PRIOR BALANCE:	\$3,205.33
TOTAL AMOUNT OF THIS INVOICE:	\$3,205.33
PRIOR BALANCE:	\$160,276.67
TOTAL BALANCE DUE:	\$163,482.00

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$3,205.33	\$3,126.90	\$3,933.52	\$3,831.69	\$149,384.56

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

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December 06, 2016

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 14875 For Services Rendered Through: November 30, 2016

	Amount
INTEREST ON PRIOR BALANCE:	\$3,161.62
TOTAL AMOUNT OF THIS INVOICE:	\$3,161.62
PRIOR BALANCE:	\$163,482.00
TOTAL BALANCE DUE:	\$166,643.62

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$3,161.62	\$3,205.33	\$3,126.90	\$3,933.52	\$153,216.25

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

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MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
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January 05, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15198 For Services Rendered Through: December 31, 2016

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
12/7/2016 JAG Review and respond to emails from AAA regarding overdue payment; confer with client regarding confirmation to dismiss arbitration for return of fees.	1.00	375.00
12/8/2016 JRM Attend court status check hearing.	0.50	187.50
PROFESSIONAL SERVICES RENDERED:	1.50	\$562.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason R. Maier	0.50	375.00	\$187.50
Joseph A. Gutierrez	1.00	375.00	\$375.00

INTEREST ON PRIOR BALANCE:	\$3,334.42
TOTAL AMOUNT OF THIS INVOICE:	\$3,896.92
PRIOR BALANCE:	\$166,643.62
TOTAL BALANCE DUE:	\$170,540.54

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15198 For Services Rendered Through: December 31, 2016

Page No. 2

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,896.92	\$3,161.62	\$3,205.33	\$3,126.90	\$157,149.77

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.

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MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
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February 08, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15469 For Services Rendered Through: January 31, 2017

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
1/10/2017 MES Phone call with arbitrator regarding status of case and deposit; Confer with Mr. Gutierrez regarding same; Receive and review AAA case management order.	0.50	137.50
1/12/2017 SGC Attend status check hearing regarding Omni Financial settlement.	0.90	247.50
PROFESSIONAL SERVICES RENDERED:	1.40	\$385.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Margaret E. Schmidt	0.50	275.00	\$137.50
Stephen G. Clough	0.90	275.00	\$247.50

CLIENT COSTS ADVANCED

1/12/2017 Local travel/parking	8.00
1/31/2017 Copies/Prints	0.35
1/31/2017 Color Copies/Prints	N/C
1/31/2017 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$8.35

INTEREST ON PRIOR BALANCE: \$3,399.35

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15469 For Services Rendered Through: January 31, 2017

Page No. 2

	<u>Amount</u>
TOTAL AMOUNT OF THIS INVOICE:	\$3,792.70
PRIOR BALANCE:	\$170,540.54
TOTAL BALANCE DUE:	\$174,333.24

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,792.70	\$3,896.92	\$3,161.62	\$3,205.33	\$160,276.67

All bills are due and payable within thirty (30) days. Prompt payment is appreciated.
Please note past-due bills will bear late fees and interest at the rate of two percent (2%) per month.



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

8816 Spanish Ridge Avenue
Las Vegas, NV 89148
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March 07, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15585 For Services Rendered Through: February 28, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,139.81
TOTAL AMOUNT OF THIS INVOICE:	\$3,139.81
PRIOR BALANCE:	\$174,333.24
TOTAL BALANCE DUE:	\$177,473.05

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,932.51	\$3,896.92	\$0.00	\$3,161.62	\$163,482.00

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.



MAIER GUTIERREZ AYON

ATTORNEYS AT LAW

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Las Vegas, NV 89148
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April 03, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 15904 For Services Rendered Through: March 31, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,550.61
TOTAL AMOUNT OF THIS INVOICE:	\$3,550.61
PRIOR BALANCE:	\$177,473.05
TOTAL BALANCE DUE:	\$181,023.66

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,550.61	\$6,932.51	\$0.00	\$3,896.92	\$166,643.62

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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Las Vegas, NV 89148
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May 04, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 16071 For Services Rendered Through: April 30, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,500.84
TOTAL AMOUNT OF THIS INVOICE:	\$3,500.84
PRIOR BALANCE:	\$181,023.66
TOTAL BALANCE DUE:	\$184,524.50

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$3,500.84	\$3,550.61	\$6,932.51	\$0.00	\$170,540.54

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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8816 Spanish Ridge Avenue
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June 07, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 16555 For Services Rendered Through: May 31, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,685.28
TOTAL AMOUNT OF THIS INVOICE:	\$3,685.28
PRIOR BALANCE:	\$184,524.50
TOTAL PAYMENTS:	(\$340.00)
TOTAL BALANCE DUE:	\$187,869.78

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,685.28	\$3,500.84	\$3,550.61	\$3,139.81	\$173,993.24

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

July 07, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 16626 For Services Rendered Through: June 30, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,633.23
TOTAL AMOUNT OF THIS INVOICE:	\$3,633.23
PRIOR BALANCE:	\$187,869.78
TOTAL BALANCE DUE:	\$191,503.01

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,633.23	\$3,685.28	\$3,500.84	\$3,550.61	\$177,133.05

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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August 08, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17047 For Services Rendered Through: July 31, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,831.84
TOTAL AMOUNT OF THIS INVOICE:	\$3,831.84
PRIOR BALANCE:	\$191,503.01
TOTAL BALANCE DUE:	\$195,334.85

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,831.84	\$3,633.23	\$3,685.28	\$3,500.84	\$180,683.66

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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Las Vegas, NV 89148
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September 11, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17285 For Services Rendered Through: August 31, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,906.03
TOTAL AMOUNT OF THIS INVOICE:	\$3,906.03
PRIOR BALANCE:	\$195,334.85
TOTAL BALANCE DUE:	\$199,240.88

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$3,906.03	\$3,831.84	\$3,633.23	\$3,685.28	\$184,184.50

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

October 04, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17443 For Services Rendered Through: September 30, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$3,853.18
TOTAL AMOUNT OF THIS INVOICE:	\$3,853.18
PRIOR BALANCE:	\$199,240.88
TOTAL BALANCE DUE:	\$203,094.06

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$3,853.18	\$3,906.03	\$3,831.84	\$3,633.23	\$187,869.78

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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Las Vegas, NV 89148
702.629.7900

November 08, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17641 For Services Rendered Through: October 31, 2017

	Amount
INTEREST ON PRIOR BALANCE:	\$4,063.77
TOTAL AMOUNT OF THIS INVOICE:	\$4,063.77
PRIOR BALANCE:	\$203,094.06
TOTAL BALANCE DUE:	\$207,157.83

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$4,063.77	\$3,853.18	\$3,906.03	\$3,831.84	\$191,503.01

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

December 05, 2017

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17791 For Services Rendered Through: November 30, 2017

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
11/06/2017	CMJ Draft stipulation and order to release bond; email correspondence with opposing counsels regarding signature on same.	0.30	45.00
11/07/2017	CMJ Email correspondence with opposing counsel regarding signature page to stipulation and order to release bond.	0.10	15.00
11/14/2017	CMJ Email correspondence to Mr. Takos regarding stipulation and order to release bond.	0.10	15.00
11/22/2017	JAG Confer with opposing counsel regarding settlement options; confer with client regarding same.	1.00	375.00
PROFESSIONAL SERVICES RENDERED:		1.50	\$450.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.00	375.00	\$375.00
Charity M. Johnson	0.50	150.00	\$75.00

INTEREST ON PRIOR BALANCE:	\$4,006.24
TOTAL AMOUNT OF THIS INVOICE:	\$4,456.24
PRIOR BALANCE:	\$207,157.83

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17791 For Services Rendered Through: November 30, 2017

Page No. 2

TOTAL BALANCE DUE:

\$211,614.07

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,456.24	\$4,063.77	\$3,853.18	\$3,906.03	\$195,334.85

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

January 04, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17993 For Services Rendered Through: December 31, 2017

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
12/14/2017 JAG Case file review; confer with client and opp counsel regarding settlement offer.	0.80	300.00

PROFESSIONAL SERVICES RENDERED:

0.80 \$300.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	0.80	375.00	\$300.00

INTEREST ON PRIOR BALANCE: \$4,225.54

TOTAL AMOUNT OF THIS INVOICE: \$4,525.54

PRIOR BALANCE: \$211,614.07

TOTAL BALANCE DUE: \$216,139.61

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$4,525.54	\$4,456.24	\$4,063.77	\$3,853.18	\$199,240.88

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 17993 For Services Rendered Through: December 31, 2017

Page No. 2

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

February 07, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18082 For Services Rendered Through: January 31, 2018

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
01/11/2018 JAG Prep for and attend hearing re status check; confer with opp counsel re settlement options.	1.50	562.50

PROFESSIONAL SERVICES RENDERED:

1.50 \$562.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.50	375.00	\$562.50

INTEREST ON PRIOR BALANCE: \$4,316.42

TOTAL AMOUNT OF THIS INVOICE: \$4,878.92

PRIOR BALANCE: \$216,139.61

TOTAL BALANCE DUE: \$221,018.53

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$4,878.92	\$4,525.54	\$4,456.24	\$4,063.77	\$203,094.06

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18082 For Services Rendered Through: January 31, 2018

Page No. 2

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8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

March 07, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18286 For Services Rendered Through: February 28, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$3,979.34
TOTAL AMOUNT OF THIS INVOICE:	\$3,979.34
PRIOR BALANCE:	\$221,018.53
TOTAL BALANCE DUE:	\$224,997.87

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$8,858.26	\$4,525.54	\$0.00	\$4,456.24	\$207,157.83

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
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April 09, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18468 For Services Rendered Through: March 31, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$4,501.35
TOTAL AMOUNT OF THIS INVOICE:	\$4,501.35
PRIOR BALANCE:	\$224,997.87
TOTAL BALANCE DUE:	\$229,499.22

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,501.35	\$8,858.26	\$0.00	\$4,525.54	\$211,614.07

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

May 09, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18605 For Services Rendered Through: April 30, 2018

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
04/18/2018 JAG File review; draft email to opposing counsel re case status and trial.	0.50	187.50
PROFESSIONAL SERVICES RENDERED:	0.50	\$187.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	0.50	375.00	\$187.50

INTEREST ON PRIOR BALANCE:	\$4,438.31
TOTAL AMOUNT OF THIS INVOICE:	\$4,625.81
PRIOR BALANCE:	\$229,499.22
TOTAL BALANCE DUE:	\$234,125.03

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$4,625.81	\$4,501.35	\$8,858.26	\$0.00	\$216,139.61

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18605 For Services Rendered Through: April 30, 2018

Page No. 2

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

June 10, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18753 For Services Rendered Through: May 31, 2018

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
05/04/2018 JAG	Draft email to opposing counsel re case status; review file for next steps.	0.80	300.00
05/24/2018 JAG	Review and respond to emails from opposing counsel regarding discovery and trial setting; review file regarding same.	0.50	187.50
PROFESSIONAL SERVICES RENDERED:		1.30	\$487.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.30	375.00	\$487.50

INTEREST ON PRIOR BALANCE:	\$4,681.05
TOTAL AMOUNT OF THIS INVOICE:	\$5,168.55
PRIOR BALANCE:	\$234,125.03
TOTAL BALANCE DUE:	\$239,293.58

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18753 For Services Rendered Through: May 31, 2018

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$5,168.55	\$4,625.81	\$4,501.35	\$3,979.34	\$221,018.53

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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702.629.7900

July 16, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 18866 For Services Rendered Through: June 30, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$4,618.36
TOTAL AMOUNT OF THIS INVOICE:	\$4,618.36
PRIOR BALANCE:	\$239,293.58
TOTAL BALANCE DUE:	\$243,911.94

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,618.36	\$5,168.55	\$4,625.81	\$4,501.35	\$224,997.87

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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August 13, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19044 For Services Rendered Through: July 31, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$4,880.69
TOTAL AMOUNT OF THIS INVOICE:	\$4,880.69
PRIOR BALANCE:	\$243,911.94
TOTAL BALANCE DUE:	\$248,792.63

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,880.69	\$4,618.36	\$5,168.55	\$4,625.81	\$229,499.22

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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September 07, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19164 For Services Rendered Through: August 31, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$4,975.00
TOTAL AMOUNT OF THIS INVOICE:	\$4,975.00
PRIOR BALANCE:	\$248,792.63
TOTAL BALANCE DUE:	\$253,767.63

AGED ACCOUNT BALANCE				
Current	30 Days	60 Days	90 Days	120+ Days
\$4,975.00	\$4,880.69	\$4,618.36	\$5,168.55	\$234,125.03

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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October 04, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19244 For Services Rendered Through: September 30, 2018

	Amount
INTEREST ON PRIOR BALANCE:	\$4,907.69
TOTAL AMOUNT OF THIS INVOICE:	\$4,907.69
PRIOR BALANCE:	\$253,767.63
TOTAL BALANCE DUE:	\$258,675.32

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$4,907.69	\$4,975.00	\$4,880.69	\$4,618.36	\$239,293.58

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

November 07, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19358 For Services Rendered Through: October 31, 2018

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
10/23/2018 NDV	Communicate with opposing counsel to follow-up on status of settlement.	0.20	30.00
10/27/2018 JAG	Review and respond to emails from defense counsel regarding settlement options and setting trial date; review documents needed for trial and setting 2.67 conference.	1.20	450.00
PROFESSIONAL SERVICES RENDERED:		1.40	\$480.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.20	375.00	\$450.00
Natalie D. Vazquez	0.20	150.00	\$30.00

INTEREST ON PRIOR BALANCE:	\$5,175.92
TOTAL AMOUNT OF THIS INVOICE:	\$5,655.92
PRIOR BALANCE:	\$258,675.32
TOTAL BALANCE DUE:	\$264,331.24

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19358 For Services Rendered Through: October 31, 2018

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$5,655.92	\$4,907.69	\$4,975.00	\$4,880.69	\$243,911.94

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

December 17, 2018

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19505 For Services Rendered Through: November 30, 2018

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
11/16/2018 NDV Draft, finalize, and file 2.67 notice.	0.50	75.00
11/19/2018 NDV Draft request and notice for next trial setting; Finalize and file.	0.50	75.00
11/30/2018 JAG Prep for 2.67 conference; review case file and status of pending action.	0.80	300.00
PROFESSIONAL SERVICES RENDERED:	1.80	\$450.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	0.80	375.00	\$300.00
Natalie D. Vazquez	1.00	150.00	\$150.00

CLIENT COSTS ADVANCED

11/30/2018 Court Fees	3.50
11/30/2018 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$7.00

INTEREST ON PRIOR BALANCE:	\$5,102.64
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TOTAL AMOUNT OF THIS INVOICE:	\$5,559.64
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Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19505 For Services Rendered Through: November 30, 2018

Page No. 2

	<u>Amount</u>
PRIOR BALANCE:	\$264,331.24
TOTAL BALANCE DUE:	\$269,890.88

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$5,559.64	\$5,655.92	\$4,907.69	\$4,975.00	\$248,792.63

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

January 10, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19567 For Services Rendered Through: December 31, 2018

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
12/05/2018	JAG Review case file and respond to emails from defense counsel regarding discovery and trial setting.	0.80	300.00
12/07/2018	NDV Draft individual pretrial memorandum.	0.90	135.00
12/14/2018	DJB Review case file and confer with Mr. Gutierrez re: upcoming hearing.	0.60	165.00
12/17/2018	NDV Finalize and file plaintiff's pretrial memorandum.	0.30	45.00
12/17/2018	DJB Travel to court for dismissal hearing; make representations to the court; return to office; brief Mr. Gutierrez on details from the hearing.	2.00	550.00
12/17/2018	DJB Teleconference with David Koch re: Gregg Hale; confer with Mr. Gutierrez on the same.	0.30	82.50
PROFESSIONAL SERVICES RENDERED:		4.90	\$1,277.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	0.80	375.00	\$300.00
Danielle J. Barraza	2.90	275.00	\$797.50
Natalie D. Vazquez	1.20	150.00	\$180.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19567 For Services Rendered Through: December 31, 2018

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
12/31/2018 Court Fees	3.50
12/31/2018 Copies/Prints	3.15
12/31/2018 Color Copies/Prints	N/C
12/31/2018 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$6.65

INTEREST ON PRIOR BALANCE:	\$5,391.67
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TOTAL AMOUNT OF THIS INVOICE:	\$6,675.82
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PRIOR BALANCE:	\$269,890.88
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TOTAL BALANCE DUE:	\$276,566.70
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,675.82	\$5,559.64	\$5,655.92	\$4,907.69	\$253,767.63

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

February 07, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19764 For Services Rendered Through: January 31, 2019

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
01/31/2019 DJB Review Supplemental Business Court Order and confer with counsel for Gregg Hale on the same.	0.30	82.50
PROFESSIONAL SERVICES RENDERED:	0.30	\$82.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	0.30	275.00	\$82.50

INTEREST ON PRIOR BALANCE:	\$5,505.73
TOTAL AMOUNT OF THIS INVOICE:	\$5,588.23
PRIOR BALANCE:	\$276,566.70
TOTAL BALANCE DUE:	\$282,154.93

AGED ACCOUNT BALANCE

<u>Current</u>	<u>30 Days</u>	<u>60 Days</u>	<u>90 Days</u>	<u>120+ Days</u>
\$5,588.23	\$6,675.82	\$5,559.64	\$5,655.92	\$258,675.32

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19764 For Services Rendered Through: January 31, 2019

Page No. 2

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Credit card payments accepted at invoice.mgalaw.com.

March 11, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19880 For Services Rendered Through: February 28, 2019

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
02/11/2019 JAG Prepare for and attend Rule 16 conference at district court.	1.50	562.50
PROFESSIONAL SERVICES RENDERED:	1.50	\$562.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.50	375.00	\$562.50

CLIENT COSTS ADVANCED

02/11/2019 Local travel/parking	6.00
02/28/2019 Copies/Prints	5.60
02/28/2019 Color Copies/Prints	N/C
02/28/2019 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$11.60

INTEREST ON PRIOR BALANCE:	\$5,091.86
TOTAL AMOUNT OF THIS INVOICE:	\$5,665.96
PRIOR BALANCE:	\$282,154.93

TOTAL BALANCE DUE:

\$287,820.89

AGED ACCOUNT BALANCE				
Current	30 Days	60 Days	90 Days	120+ Days
\$11,254.19	\$6,675.82	\$0.00	\$5,559.64	\$264,331.24

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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April 11, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 19979 For Services Rendered Through: March 31, 2019

	Amount
INTEREST ON PRIOR BALANCE:	\$5,747.70
TOTAL AMOUNT OF THIS INVOICE:	\$5,747.70
PRIOR BALANCE:	\$287,820.89
TOTAL BALANCE DUE:	\$293,568.59

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$5,747.70	\$11,254.19	\$0.00	\$6,675.82	\$269,890.88

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

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May 09, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20069 For Services Rendered Through: May 09, 2019

	Amount
INTEREST ON PRIOR BALANCE:	\$7,414.85
TOTAL AMOUNT OF THIS INVOICE:	\$7,414.85
PRIOR BALANCE:	\$293,568.59
TOTAL BALANCE DUE:	\$300,983.44

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$7,414.85	\$5,747.70	\$5,665.96	\$5,588.23	\$276,566.70

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

June 07, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20198 For Services Rendered Through: May 31, 2019

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
05/28/2019 NDV Communicate with Fronterhouse to locate Gregg Hale and forward last known address and email addresses.	0.30	45.00
05/28/2019 DJB Confer with Mr. Gutierrez re: Gregg Hale trial subpoena; review contact info for Gregg Hale in his deposition and relay to Ms. Vazquez.	0.30	82.50
PROFESSIONAL SERVICES RENDERED:	0.60	\$127.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	0.30	275.00	\$82.50
Natalie D. Vazquez	0.30	150.00	\$45.00

INTEREST ON PRIOR BALANCE:	\$4,246.69
TOTAL AMOUNT OF THIS INVOICE:	\$4,374.19
PRIOR BALANCE:	\$300,983.44
TOTAL BALANCE DUE:	\$305,357.63

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20198 For Services Rendered Through: May 31, 2019

Page No. 2

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$11,789.04	\$0.00	\$5,747.70	\$5,665.96	\$282,154.93

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card payments accepted at invoice.mgalaw.com.

July 15, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20294 For Services Rendered Through: June 30, 2019

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
06/05/2019 DJB Review/analyze Order Scheduling Calendar Call.	0.10	27.50
06/06/2019 NDV Draft pretrial disclosure.	0.70	105.00
06/07/2019 NDV Finalize and file pretrial disclosure.	0.20	30.00
06/07/2019 DJB Confer with client re: [REDACTED] review the [REDACTED] valuation of First 100 for purposes of calculating damages; confer with Ms. Vazquez on the same.	0.50	137.50
06/12/2019 NDV Finalize SAO to continue calendar call.	0.20	30.00
06/14/2019 NDV Finalize revised SAO to continue calendar call and trial date.	0.20	30.00
PROFESSIONAL SERVICES RENDERED:	1.90	\$360.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	0.60	275.00	\$165.00
Natalie D. Vazquez	1.30	150.00	\$195.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20294 For Services Rendered Through: June 30, 2019

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
06/07/2019 Private investigators 200349/Bloom, Mr. Jay /Invoice #19-0081 Check # 22758	215.00
06/30/2019 Copies/Prints	2.80
06/30/2019 Color Copies/Prints	N/C
06/30/2019 Facsimile	N/C
06/30/2019 Court Fees	3.50
CLIENT COSTS ADVANCED:	\$221.30

INTEREST ON PRIOR BALANCE:	\$5,898.20
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TOTAL AMOUNT OF THIS INVOICE:	\$6,479.50
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PRIOR BALANCE:	\$305,357.63
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TOTAL BALANCE DUE:	\$311,837.13
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,479.50	\$11,789.04	\$0.00	\$5,747.70	\$287,820.89

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

August 19, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20406 For Services Rendered Through: July 31, 2019

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
07/16/2019 NDV	Communicate with opposing counsel regarding service of trial subpoena to Joel Just and EDCR 2.67 availability.	0.30	45.00
07/22/2019 NDV	Communicate with opposing counsel to discuss EDCR 2.67 conference and acceptance of service of trial subpoena of Joel Just; Review file; Pull/save and review minutes from 2016 to present to draft stipulation and order to continue trial and calendar call and waive the five year rule.	1.70	255.00
07/23/2019 NDV	Revise SAO to release bond and SAO to vacate and reset trial date; Communicate with opposing counsel to forward the same.	0.40	60.00
07/29/2019 NDV	Finalize and file stipulation and order to vacate and reset trial date.	0.30	45.00
07/30/2019 NDV	Draft and file notice of entry of stipulation and order.	0.40	60.00
PROFESSIONAL SERVICES RENDERED:		3.10	\$465.00

TIMEKEEPER SUMMARY

Name	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Natalie D. Vazquez	3.10	150.00	\$465.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20406 For Services Rendered Through: July 31, 2019

Page No. 2

CLIENT COSTS ADVANCED

Amount

07/31/2019 Delivery Services/Courier - Special

32.00

CLIENT COSTS ADVANCED:

\$32.00

INTEREST ON PRIOR BALANCE:

\$6,228.54

TOTAL AMOUNT OF THIS INVOICE:

\$6,725.54

PRIOR BALANCE:

\$311,837.13

TOTAL BALANCE DUE:

\$318,562.67

AGED ACCOUNT BALANCE

Current

30 Days

60 Days

90 Days

120+ Days

\$6,725.54

\$6,479.50

\$11,789.04

\$0.00

\$293,568.59

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

September 09, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20502 For Services Rendered Through: August 31, 2019

CLIENT COSTS ADVANCED

	<u>Amount</u>
08/31/2019 Court Fees	3.50
08/31/2019 Court Fees	3.50
CLIENT COSTS ADVANCED:	<u>\$7.00</u>

INTEREST ON PRIOR BALANCE:	\$6,360.77
TOTAL AMOUNT OF THIS INVOICE:	\$6,367.77
PRIOR BALANCE:	\$318,562.67
TOTAL BALANCE DUE:	<u>\$324,930.44</u>

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,367.77	\$6,725.54	\$6,479.50	\$11,789.04	\$293,568.59

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

MGA
MAIER GUTIERREZ & ASSOCIATES
ATTORNEYS AT LAW
8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

October 14, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20627 For Services Rendered Through: September 30, 2019

	Amount
INTEREST ON PRIOR BALANCE:	\$6,283.98
TOTAL AMOUNT OF THIS INVOICE:	\$6,283.98
PRIOR BALANCE:	\$324,930.44
TOTAL BALANCE DUE:	\$331,214.42

<u>AGED ACCOUNT BALANCE</u>				
Current	30 Days	60 Days	90 Days	120+ Days
\$6,283.98	\$6,367.77	\$6,725.54	\$6,479.50	\$305,357.63

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

MGA
MAIER GUTIERREZ & ASSOCIATES
ATTORNEYS AT LAW
8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702.629.7900

November 13, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20725 For Services Rendered Through: October 31, 2019

	Amount
INTEREST ON PRIOR BALANCE:	\$6,627.37
TOTAL AMOUNT OF THIS INVOICE:	\$6,627.37
PRIOR BALANCE:	\$331,214.42
TOTAL BALANCE DUE:	\$337,841.79

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$6,627.37	\$6,283.98	\$6,367.77	\$6,725.54	\$311,837.13

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

December 18, 2019

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20834 For Services Rendered Through: November 30, 2019

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
11/25/2019 DJB Confer with client re: trial availability; travel to Court for calendar call; return to office and confer with Mr. Gutierrez on the hearing.	1.50	592.50
11/25/2019 DJB Review/analyze Joel Just and Eagle Rock Asset Management, LLC's Pretrial Disclosures Pursuant to NRCP 16.1.	0.20	79.00
PROFESSIONAL SERVICES RENDERED:	1.70	\$671.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	1.70	395.00	\$671.50

CLIENT COSTS ADVANCED

11/30/2019 Copies/Prints	3.85
11/30/2019 Color Copies/Prints	N/C
11/30/2019 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$3.85

INTEREST ON PRIOR BALANCE: \$6,533.54

TOTAL AMOUNT OF THIS INVOICE: \$7,208.89

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20834 For Services Rendered Through: November 30, 2019

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	<u>Amount</u>
PRIOR BALANCE:	\$337,841.79
TOTAL BALANCE DUE:	\$345,050.68

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$7,208.89	\$6,627.37	\$6,283.98	\$6,367.77	\$318,562.67

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

January 13, 2020

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20932 For Services Rendered Through: December 31, 2019

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
12/05/2019	DJB Prepare joint pretrial memorandum; send to opposing counsel for review/edits.	1.50	592.50
12/06/2019	NDV Finalize exhibit and notice of trial conflict; File.	0.40	60.00
12/06/2019	DJB Prepare Notice of Trial Conflict and Mr. Gutierrez's affidavit for the same; edit/ send to Ms. Vazquez for filing.	0.60	237.00
12/09/2019	NDV Communicate with law clerk to forward notice of trial conflict; Prepare courtesy copy of notice of trial conflict; and process delivery to chambers via Legal Wings.	0.50	75.00
12/10/2019	DJB Prepare SAO to vacate trial dates; circulate to opposing counsel.	0.30	118.50
12/11/2019	NDV Finalize stipulation and order to vacate trial and reset trial date; Communicate with opposing counsel regarding execution; Confer with chambers regarding original signatures to stipulation; Finalize and email stipulation to chambers; Process via Legal Wings to deliver hard copy of stipulation for judge's execution.	0.70	105.00
12/12/2019	DJB Review minute order; confer with Ms. Vazquez re: SAO to vacate hearing.	0.20	79.00
12/13/2019	NDV File SAO to vacate and reset trial date; Draft and file notice of entry of SAO.	0.60	90.00
12/16/2019	DJB Confer with Mr. Gutierrez re: trial dates; travel to court for calendar call; take notes on trial dates; return to office.	1.20	474.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20932 For Services Rendered Through: December 31, 2019

Page No. 2

	<u>Hours</u>	<u>Amount</u>
12/19/2019 DJB Confer with client re: trial.	0.10	39.50
12/26/2019 DJB Confer with Mr. Gutierrez and client re: Just trial.	0.20	79.00
PROFESSIONAL SERVICES RENDERED:	6.30	\$1,949.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	4.10	395.00	\$1,619.50
Natalie D. Vazquez	2.20	150.00	\$330.00

CLIENT COSTS ADVANCED

12/31/2019 Delivery Services/Courier - Standard	10.00
12/31/2019 Delivery Services/Courier - Standard	10.00
12/31/2019 Court Fees	3.50
12/31/2019 Court Fees	3.50
12/31/2019 Court Fees	3.50
12/31/2019 Copies/Prints	6.65
12/31/2019 Copies/Prints	4.20
12/31/2019 Color Copies/Prints	N/C
12/31/2019 Color Copies/Prints	N/C
12/31/2019 Facsimile	N/C
12/31/2019 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$41.35

INTEREST ON PRIOR BALANCE: **\$6,891.16**

TOTAL AMOUNT OF THIS INVOICE: **\$8,882.01**

PRIOR BALANCE: **\$345,050.68**

TOTAL BALANCE DUE: **\$353,932.69**

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 20932 For Services Rendered Through: December 31, 2019

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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$8,882.01	\$7,208.89	\$6,627.37	\$6,283.98	\$324,930.44

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

February 13, 2020

Mr. Jay Bloom
 First 100 LLC
 11920 Southern Highlands Pkwy., Suite 200
 Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
 Matter No.: 200349 First 100 v. Just/Hale
 Invoice No.: 21065 For Services Rendered Through: January 31, 2020

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
1/2/2020	JAG Meeting with client to discuss [REDACTED] continue to review documents in preparation of trial.	1.50	742.50
1/8/2020	DJB Confer with Mr. Gutierrez re: [REDACTED] confer with client re: [REDACTED]	0.30	118.50
1/10/2020	DJB Teleconference with opposing counsel re: trial witnesses; relay info to Mr. Gutierrez and confer with Mr. Gutierrez on the issue.	0.20	79.00
1/15/2020	NDV Communicate with opposing counsel to request EDCR 2.67 availability.	0.20	30.00
1/16/2020	NDV Communicate with opposing counsel to confirm date/time of EDCR 2.67 conference; Draft and file amended notice of EDCR 2.67 conference; Review Dept. 13 guidelines for trial joint exhibit list; Draft joint proposed exhibit list; Locate sealed deposition transcripts and communicate the same to Mrs. Johnson for storage locate.	1.90	285.00
1/16/2020	DJB Confer with Ms. Vazquez re: joint exhibits; confer with opposing counsel re: exhibits.	0.30	118.50
1/16/2020	DJB Work on reviewing the declarations and written discovery responses in preparation for trial.	1.00	395.00
1/17/2020	NDV Draft trial subpoena to Joel Just; Draft acceptance of service; File trial subpoena.	0.80	120.00
1/17/2020	DJB Confer with Mr. Gutierrez re: trial strategy; send deposition transcripts to client and start going through and annotating transcripts.	2.60	1,027.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21065 For Services Rendered Through: January 31, 2020

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		<u>Hours</u>	<u>Amount</u>
1/17/2020	DJB Confer with Ms. Vazquez re: trial subpoenas.	0.20	79.00
1/21/2020	PT Review/Analyze case proceedings in preparation of drafting an examination outline and cross-examination topics for Mr. Gutierrez and Ms. Barazza.	3.80	570.00
1/21/2020	PT Communicate with Mr. Gutierrez to draft a cross-examination outline in preparation of bench trial.	0.30	45.00
1/21/2020	NDV Review file; Research NRS for defendant's appearance at trial; Review file for confidential First 100, LLC documents; Confer with Mrs. Barraza regarding trial subpoena for Michael Hendrickson; Process trial subpoena, witness fee check, and acceptance of service for Joel Just via Legal Wings for delivery to opposing counsel.	0.90	135.00
1/21/2020	DJB Review file; participate in 2.67 conference with opposing counsel; confer with Mr. Gutierrez re: trial strategy.	1.00	395.00
1/21/2020	DJB Confer with Mr. Gutierrez re: [REDACTED] review docs sent from Mr. Gutierrez; send to client and confer with client on the same for trial purposes.	0.50	197.50
1/22/2020	JAG 2.67 conference; trial prep; client meeting, outline case issues	6.50	3,217.50
1/22/2020	NDV Confer with Mr. Gutierrez and Ms. Barraza regarding joint and proposed exhibits for bench trial; Communicate with chambers regarding exhibits; Draft trial subpoena to Michael Hendrickson; Bate stamp First 100, LLC confidential documents and copy to flash drive for opposing counsel; File trial subpoena; Process trial subpoena for service via Legal Wings and calculate mileage for witness check; File acceptance of service; Finalize stipulation for protective order; Process for delivery to chambers for judge's execution via Legal Wings.	2.40	360.00
1/22/2020	DJB Work on the stipulated protective order; incorporate language specific to the confidential info packet; circulate to opposing counsel for review/approval.	1.00	395.00
1/22/2020	DJB Confer with Ms. Vazquez re: trial subpoenas.	0.10	39.50
1/22/2020	DJB Review and annotate deposition transcripts in preparation for trial; work on trial outlines; work on editing the pretrial memorandum with further details.	3.00	1,185.00
1/23/2020	JAG Review deposition transcripts, trial prep; draft direct and cross-examination, outline case issues	6.30	3,118.50
1/23/2020	PT Research elements of all 15 claims of relief in preparation of drafting a cross-examination outline.	1.50	225.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21065 For Services Rendered Through: January 31, 2020

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		Hours	Amount
1/23/2020 PT	Begin to draft cross-examination outline of Joel Just in preparation of bench trial for Mr. Gutierrez.	2.90	435.00
1/23/2020 NDV	Revise joint exhibit list, locate, and save all exhibits; Confer with Oasis to obtain exhibits to Hale and Just's depositions; Confer with Ms. Barraza regarding trial exhibits and deposition exhibits.	3.10	465.00
1/23/2020 DJB	Work on joint trial exhibits; review/analyze/annotate the disclosed docs and compare to exhibits used in depositions; add the deposition exhibits as additional trial exhibits; confer with opposing counsel on the same.	2.20	869.00
1/23/2020 DJB	Go through prior pleadings and locate and review/analyze the confidential packet submitted under seal previously; confer with Mr. Gutierrez on the same; send docs to opposing counsel for review.	1.80	711.00
1/23/2020 DJB	Make additions to the joint pretrial memorandum; edit/revise the witness list and edit/revise the summary of claims being asserted and incorporate the legal and factual basis for all of Plaintiff's claims; incorporate Westlaw research for each cause of action; circulate pretrial memo to opposing counsel for his additions.	2.50	987.50
1/23/2020 DJB	Review correspondence from opposing counsel re: stipulated and proposed trial exhibits.	0.10	39.50
1/24/2020 NDV	Upload joint exhibits; Confer with Ms. Barraza regarding joint exhibits; Renumber joint exhibits and revise joint exhibit list; Communicate with HOLO for trial exhibit preparation exhibits; Finalize and file joint pretrial memorandum; Prepare trial exhibit binder cover; Confer with process server to confirm serve in our office on 1/26 to Michael Hendrickson.	2.40	360.00
1/24/2020 PT	Communicate with Ms. Barraza regarding mixed facts in Joel Just's deposition.	0.50	75.00
1/24/2020 PT	Continue to draft cross examination outline of Joel Just in preparation of upcoming bench trial for Mr. Gutierrez.	3.20	480.00
1/24/2020 DJB	Confer with opposing counsel re: edits to the pretrial memorandum; make further edits/revisions to the document; send to Ms. Vazquez for filing.	0.60	237.00
1/24/2020 DJB	Confer with opposing counsel re: joint exhibits; confer with and work with Ms. Vazquez on fixing the order of the joint exhibit list to reflect the correct order.	0.30	118.50
1/24/2020 DJB	Work on trial prep; go through trial exhibit documents and organize important emails and communications between the parties; review/analyze the contracts/employment agreements/Operating	3.50	1,382.50

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21065 For Services Rendered Through: January 31, 2020

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			<u>Hours</u>	<u>Amount</u>
		agreements at issue and review confidentiality and attorneys' fees clauses; review the communications disclosed by Just.		
1/26/2020	JAG	Trial prep - continue to draft outline of case presentation and evidence; outline direct examination questions; draft damages analysis and list of issues for closing argument; draft cross examination questions for Hale and Just; review all discovery and depo transcripts.	7.80	3,861.00
1/26/2020	DJB	Meet with client and Mr. Gutierrez for trial prep; work on the proposed FFCL; review/analyze the prior injunctive relief orders for purposes of incorporating into the proposed FFCL.	1.80	711.00
1/27/2020	JAG	Trial prep; meeting with client and witnesses; draft outline of direct and cross examinations; review and mark all potential trial exhibits.	6.30	3,118.50
1/27/2020	NDV	Communicate with HOLO regarding trial binders; Process trial binders for delivery to chambers; Communicate with opposing counsel for pick-up of trial exhibit binders; Finalize and file proposed findings of fact, conclusions of law, and order granting relief; Communicate with court clerk to forward Microsoft Word documents of proposed findings of fact and joint exhibit list; Prepare and print copies six Excel spreadsheets to fit on one page for Mr. Gutierrez's trial preparation;	1.60	240.00
1/27/2020	PT	Complete cross-examination outline of Joel Just for Mr. Gutierrez in preparation of upcoming bench trial.	2.00	300.00
1/27/2020	DJB	Work on the proposed FFCL; incorporate facts from the evidentiary documents and incorporate legal analysis from Westlaw findings; edit/revise; add findings re: attorneys' fees and costs; send to Ms. Vazquez for filing.	3.60	1,422.00
1/27/2020	DJB	Review defendant's proposed FFCL; confer with Mr. Gutierrez on trial strategy and review deposition testimony in preparation for trial; work on trial outlines.	3.50	1,382.50
1/28/2020	NDV	Trial bate J53; Revise joint exhibit list; Prepare copies for chambers, opposing counsel, and our office; Communicate with chambers regarding revised exhibit list; Draft, finalize, and file notice of entry of order.	1.40	210.00
1/28/2020	PT	Draft timeline of events since 2012 involving Joel Just and Gregg Hale for Mr. Gutierrez in preparation of upcoming bench trial.	3.00	450.00
1/28/2020	JAG	Prepare for and attend day 1 of trial.	8.00	3,960.00
1/28/2020	DJB	Prepare for trial; meet with Ms. Vazquez and organize/gather Joint Exhibit 53; travel to Court; take note son the trial proceedings and testimony for future incorporation into closing argument briefs; return to office.	7.00	2,765.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21065 For Services Rendered Through: January 31, 2020

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			<u>Hours</u>	<u>Amount</u>
1/28/2020	DJB	Review trial exhibits and look for certain emails/communications to be used at trial; confer with Mr. Gutierrez on the same.	1.20	474.00
1/29/2020	JAG	Prepare for and attend Day 2 of trial.	8.00	3,960.00
1/29/2020	DJB	Prepare for the testimony of David Swenson and Chris Yergenson; confer with Mr. Gutierrez on trial points; appear for trial; confer with Mr. Gutierrez on trial strategy going forward.	4.00	1,580.00
1/29/2020	DJB	Work on organizing/typing/outlining important parts of testimony for closing argument briefs.	0.80	316.00
1/30/2020	JAG	Prepare for and attend day 3 of trial.	4.80	2,376.00
1/30/2020	PT	Attend bench trial of Joel Just with Mr. Gutierrez and Ms. Barraza.	5.00	750.00
1/30/2020	DJB	Confer with Mr. Gutierrez re: trial testimony and briefing schedule for closing briefs; work on initial outline for brief.	0.80	316.00

PROFESSIONAL SERVICES RENDERED:

130.00 \$47,229.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	49.20	495.00	\$24,354.00
Danielle J. Barraza	43.90	395.00	\$17,340.50
Pengxiang Tian	22.20	150.00	\$3,330.00
Natalie D. Vazquez	14.70	150.00	\$2,205.00

CLIENT COSTS ADVANCED

1/29/2020	Local travel	23.00
	LAZ Parking	
1/31/2020	Delivery Services/Courier - Special	102.08
1/31/2020	Delivery Services/Courier - Special	102.00
1/31/2020	Delivery Services/Courier - Standard	10.00
1/31/2020	Subpoena/Process Fees	79.00
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50
1/31/2020	Court Fees	3.50

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21065 For Services Rendered Through: January 31, 2020

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	<u>Amount</u>
1/31/2020 Court Fees	3.50
1/31/2020 Copies/Prints	259.00
1/31/2020 Copies/Prints	26.25
1/31/2020 Color Copies/Prints	53.30
1/31/2020 Color Copies/Prints	N/C
1/31/2020 Facsimile	N/C
1/31/2020 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$682.63

INTEREST ON PRIOR BALANCE:	\$7,039.20
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TOTAL AMOUNT OF THIS INVOICE:	\$54,951.33
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PRIOR BALANCE:	\$353,932.69
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TOTAL BALANCE DUE:	\$408,884.02
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$54,951.33	\$8,882.01	\$7,208.89	\$6,627.37	\$331,214.42

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

March 12, 2020

Mr. Jay Bloom
First 100 LLC
11920 Southern Highlands Pkwy., Suite 200
Las Vegas, NV 89141

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21179 For Services Rendered Through: February 29, 2020

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
2/3/2020	NDV Communicate with Holo regarding invoice to Takos Law for trial binders; Communicate with opposing counsel to forward the same; Communicate with Mrs. Johnson for processing.	0.40	60.00
2/18/2020	NDV Scan and save check to file for bench trial recording; Process via Legal Wings for delivery to court cashier.	0.40	60.00
2/18/2020	DJB Prepare Closing Brief; go through notes from trial and Gregg Hale's deposition testimony; review/analyze additional trial exhibits; draft legal arguments; edit/revise; file document.	5.00	1,975.00
2/18/2020	JAG Review and edit closing brief; confer with Ms. Barazza re same.	1.00	495.00
2/19/2020	NDV Prepare courtesy copy of plaintiff's closing brief and submit to chambers via Legal Wings.	0.30	45.00
PROFESSIONAL SERVICES RENDERED:		7.10	\$2,635.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph A. Gutierrez	1.00	495.00	\$495.00
Danielle J. Barraza	5.00	395.00	\$1,975.00
Natalie D. Vazquez	1.10	150.00	\$165.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21179 For Services Rendered Through: February 29, 2020

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
1/29/2020 Local travel	23.00
LAZ Parking	
1/30/2020 Local travel	14.00
LAZ Parking	
2/4/2020 Litigation support vendors	1,112.35
200349/Bloom, Mr. Jay /Invoice #8973	
Check # 23723	
2/17/2020 Litigation support vendors	N/C
200349/Bloom, Mr. Jay /Invoice #8973	
Check # 23769	
2/17/2020 Deposition/Court Transcripts	160.00
200349/Bloom, Mr. Jay /A-14-705993-B	
Check # 23768	
2/29/2020 Delivery Services/Courier - Standard	10.00
2/29/2020 Delivery Services/Courier - Standard	10.00
2/29/2020 Court Fees	3.50
2/29/2020 Copies/Prints	7.00
2/29/2020 Color Copies/Prints	N/C
2/29/2020 Facsimile	N/C
CLIENT COSTS ADVANCED:	<u>\$1,339.85</u>

INTEREST ON PRIOR BALANCE:	\$6,748.96
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TOTAL AMOUNT OF THIS INVOICE:	\$10,723.81
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PRIOR BALANCE:	\$408,884.02
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TOTAL BALANCE DUE:	<u>\$419,607.83</u>
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AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$65,675.14	\$0.00	\$8,882.01	\$7,208.89	\$337,841.79

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

April 6, 2020

Mr. Jay Bloom
5148 Spanish Heights Drive
Las Vegas, NV 89148

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21273 For Services Rendered Through: March 31, 2020

PROFESSIONAL SERVICES

		<u>Hours</u>	<u>Amount</u>
3/5/2020	DJB Review/analyze Defendants/Counterclaimants' Closing Brief in preparation of drafting rebuttal brief.	0.20	79.00
3/17/2020	DJB Draft the rebuttal closing brief; incorporate arguments on First 100 meeting the burden of proof regarding damages; meeting the burden of proof regarding causation; the non-dispositive nature of the lack of a non-compete agreement; Just using confidential information for his gain; the breach of fiduciary duties; and Just's failure to prove counterclaims; edit/revise; file brief.	3.80	1,501.00
3/18/2020	NDV Prepare courtesy copy of plaintiffs' rebuttal to defendants closing brief; Process via Legal Wings to submit to chambers.	0.30	45.00
3/27/2020	DJB Make edits/revisions to the proposed FFCL based on the evidence presented at trial; circulate revised version to the Court's clerk per request.	1.00	395.00

PROFESSIONAL SERVICES RENDERED:

5.30 \$2,020.00

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Danielle J. Barraza	5.00	395.00	\$1,975.00
Natalie D. Vazquez	0.30	150.00	\$45.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21273 For Services Rendered Through: March 31, 2020

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
3/31/2020 Copies/Prints	4.20
3/31/2020 Color Copies/Prints	N/C
3/31/2020 Facsimile	N/C
3/31/2020 Court Fees	3.50
3/31/2020 Delivery Services/Courier - Standard	10.00
CLIENT COSTS ADVANCED:	\$17.70

INTEREST ON PRIOR BALANCE:	\$8,305.43
TOTAL AMOUNT OF THIS INVOICE:	\$10,343.13
PRIOR BALANCE:	\$419,607.83
TOTAL BALANCE DUE:	\$429,950.96

AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$10,343.13	\$10,723.81	\$54,951.33	\$8,882.01	\$345,050.68

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

May 4, 2020

Mr. Jay Bloom
5148 Spanish Heights Drive
Las Vegas, NV 89148

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21373 For Services Rendered Through: April 30, 2020

PROFESSIONAL SERVICES

	<u>Hours</u>	<u>Amount</u>
3/17/2020 JAG Review and edit rebuttal closing brief; confer with client regarding arguments [REDACTED] and review issues related to Just using confidential information for his gain.	1.00	495.00
4/22/2020 JAG Review ruling on trial and confer with client regarding [REDACTED]	0.80	396.00
4/23/2020 JRM Emails with JAG re [REDACTED]	0.10	49.50
4/24/2020 NDV Draft, finalize, and file notice of entry of judgment.	0.50	75.00
4/29/2020 CMJ Draft, file and serve verified memorandum of costs and disbursements; prepare prejudgment interest worksheet; gather supporting documents in support of costs.	1.20	180.00

PROFESSIONAL SERVICES RENDERED:

3.60 \$1,195.50

TIMEKEEPER SUMMARY

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jason R. Maier	0.10	495.00	\$49.50
Joseph A. Gutierrez	1.80	495.00	\$891.00
Charity M. Johnson	1.20	150.00	\$180.00
Natalie D. Vazquez	0.50	150.00	\$75.00

Client No.: 2002 Mr. Jay Bloom
Matter No.: 200349 First 100 v. Just/Hale
Invoice No.: 21373 For Services Rendered Through: April 30, 2020

Page No. 2

CLIENT COSTS ADVANCED

	<u>Amount</u>
4/30/2020 Court Fees	3.50
4/30/2020 Copies/Prints	14.35
4/30/2020 Color Copies/Prints	N/C
4/30/2020 Facsimile	N/C
CLIENT COSTS ADVANCED:	\$17.85

INTEREST ON PRIOR BALANCE:	\$8,277.20
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TOTAL AMOUNT OF THIS INVOICE:	\$9,490.55
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PRIOR BALANCE:	\$429,950.96
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TOTAL BALANCE DUE:	\$439,441.51
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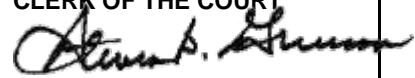
AGED ACCOUNT BALANCE

Current	30 Days	60 Days	90 Days	120+ Days
\$9,490.55	\$10,343.13	\$10,723.81	\$54,951.33	\$353,932.69

All invoices are due and payable upon receipt. Prompt payment is appreciated.
Past-due invoices will incur late fees at the rate of two percent (2%) per month.
Credit card and electronic check payments accepted online at invoice.mgalaw.com.

EXHIBIT 3

EXHIBIT 3



MEMC
JOSEPH A. GUTIERREZ, ESQ.
Nevada Bar No. 9046
DANIELLE J. BARRAZA, ESQ.
Nevada Bar No. 13822
MAIER GUTIERREZ & ASSOCIATES
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Telephone: (702) 629-7900
Facsimile: (702) 629-7925
E-mail: jag@mgalaw.com
djb@mgalaw.com

*Attorneys for Plaintiffs First 100, LLC and
1st One Hundred Holdings, LLC*

DISTRICT COURT

CLARK COUNTY, NEVADA

FIRST 100, LLC, a Nevada limited liability
company; 1st ONE HUNDRED HOLDINGS,
LLC, a Nevada limited liability company,

Plaintiffs,

vs.

JOEL JUST, an individual; EAGLE ROCK
ASSET MANAGEMENT, LLC, a Foreign
Limited Liability Company; KREGG HALE, an
individual; XRIVER PROPERTIES, LLC, a
Foreign Limited Liability Company; DOES I
through X; and ROE ENTITIES I through X,
inclusive,

Defendants.

Case No.: A-14-705993-B
Dept. No.: XIII

**VERIFIED MEMORANDUM OF COSTS
AND DISBURSEMENTS**

Plaintiffs First 100, LLC and 1st One Hundred Holdings, LLC (collectively "Plaintiffs"), by
and through their attorneys of record, the law firm MAIER GUTIERREZ & ASSOCIATES, hereby submits
this verified memorandum of costs and disbursements pursuant to NRS 18.005, 18.020 and 18.110.

In successfully prosecuting this action, plaintiffs reasonably and necessarily incurred the
following costs and expenses:

Arbitrators/Mediators	\$11,700.00
Court Fees	\$7,818.50
Delivery Services - Special	\$642.08

Deposition/Court Transcripts	\$5,513.53
Litigation Support Vendors	\$2,097.82
Local Travel	\$80.00
Private Investigators	\$215.00
Subpoena/Process Fees	\$2,215.14
Westlaw	\$99.00
Color Copies/Prints	\$67.60
Copies/Prints	\$2,695.00
Delivery Services - Standard	\$337.50
Facsimile	\$6.75
Postage	\$114.98
TOTAL:	\$33,602.90

An itemized breakdown of the above-listed costs and disbursements is attached hereto as **Exhibit 1**. Each of the above costs and disbursements were necessarily and reasonably incurred for the successful prosecution of this action, and are taxable pursuant to NRS 18.005 and 18.020. Plaintiffs could not have successfully taken this case to a judgment without incurring each of the above costs and disbursements.

Accordingly, Plaintiffs should be awarded \$33,602.90 in taxable costs and disbursements, as well as prejudgment interest on said costs and disbursements in the amount of \$12,712.14 pursuant to NRS 17.130.

DATED this 24th day of April, 2020.

Respectfully submitted,

MAIER GUTIERREZ & ASSOCIATES

/s/ Joseph A. Gutierrez
JOSEPH A. GUTIERREZ, ESQ.
Nevada Bar No. 9046
DANIELLE J. BARRAZA, ESQ.
Nevada Bar No. 13822
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Attorneys for Plaintiffs First 100, LLC and
1st One Hundred Holdings, LLC

**AFFIDAVIT OF COUNSEL IN SUPPORT OF
VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS**

STATE OF NEVADA

ss:

COUNTY OF CLARK

JOSEPH A. GUTIERREZ, ESQ., being duly sworn, deposes and says that:

1. I am a partner with the law firm of MAIER GUTIERREZ & ASSOCIATES, counsel for plaintiffs First 100, LLC and 1st One Hundred Holdings, LLC, and I have personal knowledge of the following facts and if called upon could competently testify to such facts.

2. Attached hereto as **Exhibit 1**, is a true and correct copy of the costs and disbursements expended in this matter by MAIER GUTIERREZ & ASSOCIATES.

3. The items contained in plaintiffs' memorandum of costs and disbursements are true and correct to the best of my knowledge and belief, and that said costs and disbursements have been necessarily and reasonably incurred and paid, or are in the process of being paid, for the successful prosecution of this action.

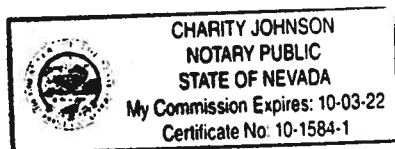
4. I declare under penalty of perjury that the foregoing is true and correct.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

JOSEPH A. GUTIERREZ, ESQ.

SUBSCRIBED and SWORN to before me
this 21 day of April, 2020.

Notary Public for said County and State



1 **CERTIFICATE OF SERVICE**

2 Pursuant to Administrative Order 14-2, a copy of the **VERIFIED MEMORANDUM OF**
3 **COSTS AND DISBURSEMENTS** was electronically filed on the 29th day of April, 2020 and served
4 through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties
5 listed on the Court's Master Service List, as follows:

6 Zachary P. Takos, Esq.
7 TAKOS LAW, LTD.
8 1980 Festival Plaza Drive, Suite 300
9 Las Vegas, Nevada 89135
10 *Attorneys for defendants Joel Just and*
11 *Eagle Rock Asset Management, LLC*

12 /s/ Charity Johnson
13 An Employee of MAIER GUTIERREZ & ASSOCIATES
14
15
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28

EXHIBIT 1

EXHIBIT 1

Damages							
Start Date	End Date	Description	Amount	Interest Rate	Years	Prejudgment Interest	Total Amount Including Prejudgment Interest
8/22/14	4/22/20	Judgment	\$420,000.00	7.50%	5.6712	\$178,643.84	\$598,643.84
		TOTAL	\$420,000.00			\$178,643.84	\$598,643.84

9/30/15	4/22/20	Postage	\$0.98	7.00%	1666	\$0.37	\$1.35
10/31/15	4/22/20	Postage	\$0.98	7.00%	1635	\$0.36	\$1.34
11/30/15	4/22/20	Postage	\$2.84	7.00%	1605	\$1.02	\$3.86
11/30/15	4/22/20	Postage	\$4.16	7.00%	1605	\$1.50	\$5.66
11/30/15	4/22/20	Postage	\$1.86	7.00%	1605	\$0.67	\$2.53
8/31/16	4/22/20	Postage	\$0.47	7.00%	1330	\$0.14	\$0.61
8/31/16	4/22/20	Postage	\$48.64	7.00%	1330	\$14.13	\$62.77
6/7/19	4/22/20	Private Investigators	\$215.00	7.00%	320	\$13.61	\$228.61
8/30/14	4/22/20	Subpoena/Process Fees	\$70.00	7.00%	2062	\$33.95	\$103.95
8/30/14	4/22/20	Subpoena/Process Fees	\$120.00	7.00%	2062	\$58.20	\$178.20
12/31/14	4/22/20	Subpoena/Process Fees	\$340.00	7.00%	1939	\$153.13	\$493.13
1/14/15	4/22/20	Subpoena/Process Fees	\$100.00	7.00%	1925	\$44.65	\$144.65
9/30/15	4/22/20	Subpoena/Process Fees	\$79.64	7.00%	1666	\$29.98	\$109.62
2/24/16	4/22/20	Subpoena/Process Fees	\$139.50	7.00%	1519	\$47.17	\$186.67
2/24/16	4/22/20	Subpoena/Process Fees	\$139.50	7.00%	1519	\$47.17	\$186.67
2/24/16	4/22/20	Subpoena/Process Fees	\$185.00	7.00%	1519	\$62.56	\$247.56
2/24/16	4/22/20	Subpoena/Process Fees	\$159.50	7.00%	1519	\$53.93	\$213.43
2/24/16	4/22/20	Subpoena/Process Fees	\$159.50	7.00%	1519	\$53.93	\$213.43
2/24/16	4/22/20	Subpoena/Process Fees	\$204.50	7.00%	1519	\$69.15	\$273.65
2/24/16	4/22/20	Subpoena/Process Fees	\$204.50	7.00%	1519	\$69.15	\$273.65
2/24/16	4/22/20	Subpoena/Process Fees	\$185.00	7.00%	1519	\$62.56	\$247.56
4/30/16	4/22/20	Subpoena/Process Fees	\$49.50	7.00%	1453	\$15.91	\$65.41
1/31/20	4/22/20	Subpoena/Process Fees	\$79.00	7.00%	82	\$1.25	\$80.25
9/30/14	4/22/20	Westlaw	\$99.00	7.00%	2031	\$47.14	\$146.14
		TOTAL	\$33,602.90			\$12,712.14	\$46,315.04

Verdict	\$420,000.00
Interest	\$178,643.84
Judgment	\$598,643.84

Costs	\$33,602.90
Interest	\$12,712.14
Amended Judgment	\$644,958.87

Daily Post-judgment Interest	\$92.77
-------------------------------------	----------------



AMERICAN
ARBITRATION
ASSOCIATION*

INTERNATIONAL CENTRE
FOR DISPUTE RESOLUTION*

402 W. Broadway, Suite 400
San Diego, CA 92101
Telephone: (619)239-3051
Fax: (619)595-3150

Statement Date	Amount Currently Due
18-Sep-2015	\$5,200.00
Case #	
01-15-0002-8881-1-JE	

Payment is due upon Receipt

Summary Invoice/Statement

Joseph A. Gutierrez, Esq.
Maier Gutierrez Ayon
400 South 7th Street
Suite 400
Las Vegas, NV 89101

Representing: First 100, LLC and
Re: First 100, LLC and
1st One Hundred Holdings, LLC
Vs.
Kregg Hale
Vs.
Joel Just

Please detach and return with Payment to Above Address

Please Indicate Case No. on Check



AMERICAN
ARBITRATION
ASSOCIATION*

INTERNATIONAL CENTRE
FOR DISPUTE RESOLUTION*

402 W. Broadway, Suite 400
San Diego, CA 92101
Telephone: (619)239-3051
Fax: (619)595-3150

Joseph A. Gutierrez, Esq.
Maier Gutierrez Ayon
400 South 7th Street
Suite 400
Las Vegas, NV 89101

Representing: First 100, LLC and
Re: First 100, LLC and
1st One Hundred Holdings, LLC
Vs.
Kregg Hale
Vs.
Joel Just

Statement Date	Case #	Previous Balance	Credits	New Charges	Statement Balance
18-Sep-2015	01-15-0002-8881	-\$2,500.00	\$0.00	\$7,700.00	\$5,200.00

Date	Ref #	Description	Amount	Credits	Balance	Due Date
20-Aug-2015	11318884	Final Fee	\$7,700.00	\$0.00	\$7,700.00	20-Aug-2015
18-Jun-2015	11266029	Proceed Fee	\$5,700.00	\$8,200.00	-\$2,500.00	18-Jun-2015
13-Mar-2015	11147991	Initial Administrative Fee	\$3,500.00	\$3,500.00	\$0.00	13-Mar-2015

Remarks For any inquiries please call: (619)239-3051

Please mail check to 402 W. Broadway, Suite 400
San Diego, CA 92101
Telephone: (619)239-3051
Fax: (619)595-3150

Statement Balance	Balance Currently Due
\$5,200.00	\$5,200.00

Please Indicate Case No. on
check

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

3453187

Submitted Date

11/16/2018 10:29 AM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Notice - NOTC (CIV)

Filing DescriptionNotice of Pretrial Conference Pursuant to
EDCR 2.67(a)**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

11/16/2018 11:04 AM PST

Lead Document

File Name	Description	Security	Download
Notice of Pretrial Conference Pursuant to EDCR 2.67.pdf	Notice - NOTC (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	11/27/2018 11:23 AM PST
Sent	Allyson R. Noto .		Yes	11/19/2018 9:23 AM PST
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	12/6/2018 8:26 AM PST
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	11/16/2018 5:01 PM PST
Sent	Zach Takos .		Yes	11/27/2018 10:34 AM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Notice - NOTC (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	4267363
Filing Attorney	Joseph Gutierrez	Order Id	003453187-0
Transaction Response	Payment Complete		

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

3465476

Submitted Date

11/19/2018 6:18 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Notice - NOTC (CIV)

Filing Description

Notice and Request for Next Trial Stack

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

11/21/2018 10:42 AM PST

Lead Document

File Name	Description	Security	Download
Notice and request.pdf	Notice - NOTC (CIV)		Original File Court Copy

eService Details

Status**Name****Firm****Served****Date Opened**

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	Not Opened
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	11/27/2018 10:37 AM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Notice - NOTC (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	4291198
Filing Attorney	Joseph Gutierrez	Order Id	003465476-0
Transaction Response	Payment Complete		

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

3583989

Submitted Date

12/17/2018 1:53 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Pre-trial Memorandum - PMEM (CIV)

Filing Description

Plaintiffs' Pretrial Memorandum

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

12/17/2018 2:00 PM PST

Lead Document

File Name	Description	Security	Download
Ps Pretrial Memorandum.pdf - First 100, LLC v. Just, et al..pdf	Pre-trial Memorandum - PMEM (CIV)	Public Filed Document	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
--------	------	------	--------	-------------

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	12/17/2018 1:56 PM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	12/17/2018 1:54 PM PST
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	2/6/2019 1:58 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Pre-trial Memorandum - PMEM (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	4417931
Filing Attorney	Joseph Gutierrez	Order Id	003583989-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

4416395

Submitted Date

6/7/2019 4:52 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Pre-Trial Disclosure - PTD (CIV)

Filing Description

Plaintiffs' Pretrial Disclosure

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

6/7/2019 4:53 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Ps Pretrial Disclosures.pdf - First 100, LLC v. Joel Just, et al..pdf	Pre-Trial Disclosure - PTD (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	6/10/2019 11:03 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	6/11/2019 2:56 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Pre-Trial Disclosure - PTD (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	5374346
Filing Attorney	Danielle Barraza	Order Id	004416395-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

4664973

Submitted Date

7/29/2019 12:36 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Stipulation and Order - SAO (CIV)

Filing DescriptionStipulation and Order to Vacate and Reset
Trial Date**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

7/29/2019 12:38 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
SAO to vacate and reset trial date.pdf	Stipulation and Order - SAO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	7/29/2019 1:46 PM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	7/29/2019 10:20 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Stipulation and Order - SAO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	5657187
Filing Attorney	Joseph Gutierrez	Order Id	004664973-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

4671308

Submitted Date

7/30/2019 11:35 AM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing CodeNotice of Entry of Stipulation and Order -
NTSO (CIV)**Filing Description**

Notice of Entry of Stipulation and Order

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

7/30/2019 11:37 AM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Notice of Entry of SAO (to Vacate and Reset Trial, 3rd request).pdf	Notice of Entry of Stipulation and Order - NTSO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	7/30/2019 11:38 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	7/30/2019 11:39 AM PST
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	8/4/2019 9:39 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Notice of Entry of Stipulation and Order - NTSO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	5664409
Filing Attorney	Joseph Gutierrez	Order Id	004671308-0
Transaction Response	Payment Complete		

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5309205

Submitted Date

12/6/2019 11:36 AM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Notice - NOTC (CIV)

Filing DescriptionPlaintiffs' Notice of Trial Conflict and
Request to Vacate Current Trial Dates**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

12/6/2019 11:38 AM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Notice of Trial Conflict.pdf - Joel Just.pdf	Notice - NOTC (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	12/9/2019 8:52 AM PST
Sent	Allyson R. Noto .		Yes	12/6/2019 11:38 AM PST
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	12/6/2019 12:01 PM PST
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	12/10/2019 3:22 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Notice - NOTC (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6382060
Filing Attorney	Joseph Gutierrez	Order Id	005309205-0
Transaction Response	Payment Complete		

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Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5348188

Submitted Date

12/13/2019 4:50 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Stipulation and Order - SAO (CIV)

Filing DescriptionStipulation and Order to Vacate and Reset
Trial Date**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

12/13/2019 4:51 PM PST

Lead Document

File Name	Description	Security	Download
SAO to vacate and reset trial date - First 100, LLC v. Joel Just.pdf	Stipulation and Order - SAO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	12/16/2019 8:27 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	12/13/2019 4:51 PM PST
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	12/17/2019 2:15 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Stipulation and Order - SAO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6426022
Filing Attorney	Danielle Barraza	Order Id	005348188-0
Transaction Response	Payment Complete		

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Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5348246

Submitted Date

12/13/2019 4:58 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing CodeNotice of Entry of Stipulation and Order -
NTSO (CIV)**Filing Description**

Notice of Entry of Stipulation and Order

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

12/13/2019 4:59 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Notice of Entry of SAO (to Vacate and Reset Trial, 4th request).pdf	Notice of Entry of Stipulation and Order - NTSO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	12/16/2019 8:34 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	1/15/2020 2:27 PM PST
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	12/17/2019 2:16 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Notice of Entry of Stipulation and Order - NTSO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6426098
Filing Attorney	Danielle Barraza	Order Id	005348246-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5495982

Submitted Date

1/16/2020 11:03 AM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Amended Notice - ANOT (CIV)

Filing DescriptionAmended Notice of Pretrial Conference
Pursuant to EDCR 2.67(a)**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/16/2020 11:05 AM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Amended Notice of Pretrial Conference Pursuant to EDCR 2.67.pdf	Amended Notice - ANOT (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/16/2020 11:27 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/21/2020 12:14 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Amended Notice - ANOT (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6594758
Filing Attorney	Joseph Gutierrez	Order Id	005495982-0
Transaction Response	Payment Complete		

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5504153

Submitted Date

1/17/2020 12:15 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Trial Subpoena - TSUB (CIV)

Filing Description

Trial Subpoena

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/17/2020 12:16 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Trial Subpoena to Joel Just.pdf	Trial Subpoena - TSUB (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/17/2020 12:24 PM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	1/17/2020 12:21 PM PST
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/17/2020 12:23 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Trial Subpoena - TSUB (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	Joel Just	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6604098
Filing Attorney	Danielle Barraza	Order Id	005504153-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5521761

Submitted Date

1/22/2020 12:30 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Trial Subpoena - TSUB (CIV)

Filing Description

Trial Subpoena

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/22/2020 12:31 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Trial Subpoena to Michael Hendrickson.pdf	Trial Subpoena - TSUB (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/27/2020 11:43 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	1/22/2020 12:52 PM PST
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/22/2020 1:36 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Trial Subpoena - TSUB (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6623805
Filing Attorney	Danielle Barraza	Order Id	005521761-0
Transaction Response	Payment Complete		

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Version: 2019.0.6.8724

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5524300

Submitted Date

1/22/2020 3:47 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Acceptance of Service - ACSR (CIV)

Filing Description

Acceptance of Service

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/22/2020 3:49 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Acceptance of Service.pdf	Acceptance of Service - ACSR (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/27/2020 8:32 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/22/2020 3:52 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Acceptance of Service - ACSR (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6626848
Filing Attorney	Danielle Barraza	Order Id	005524300-0
Transaction Response	Payment Complete		

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Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5539001

Submitted Date

1/24/2020 3:35 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing CodeJoint Pre-Trial Memorandum - JPTM
(CIV)**Filing Description**

Joint Pretrial Memorandum

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/24/2020 3:36 PM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
Joint Pretrial Memorandum.pdf - First 100, LLC.pdf	Joint Pre-Trial Memorandum - JPTM (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/27/2020 7:10 AM PST
Sent	Allyson R. Noto .		Yes	1/27/2020 8:38 AM PST
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/24/2020 3:39 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Joint Pre-Trial Memorandum - JPTM (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6643917
Filing Attorney	Danielle Barraza	Order Id	005539001-0
Transaction Response	Payment Complete		

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Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5545892

Submitted Date

1/27/2020 2:16 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing CodeFindings of Fact, Conclusions of Law and
Judgment - FFCL (CIV)**Filing Description**Plaintiffs' Proposed Findings of Fact,
Conclusions of Law, and Order Granting
Relief in Favor of Plaintiffs**Client Reference Number**

200349

Filing on Behalf ofFirst 100 LLC, 1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/27/2020 3:37 PM PST

Lead Document

File Name	Description	Security	Download
Proposed Findings of Fact, Conclusions of Law, and Order.pdf	Findings of Fact, Conclusions of Law and Judgment - FFCL (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/27/2020 2:19 PM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/27/2020 5:03 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address

Fees

Findings of Fact, Conclusions of Law and Judgment - FFCL (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total: \$3.50	

Party Responsible for Fees	First 100 LLC	Transaction Amount	\$3.50
Payment Account	Firm Admin	Transaction Id	6653648
Filing Attorney	Joseph Gutierrez	Order Id	005545892-0
Transaction Response	Payment Complete		

Case # A-14-705993-B - First 100 LLC, Plaintiff(s)vs.Joel Just, Defer

Envelope Information

Envelope Id

5548317

Submitted Date

1/27/2020 5:19 PM PST

Submitted User Name

docket@mgalaw.com

Case Information

Location

Department 13

Category

Civil

Case Type

Other Business Court Matters

Case Initiation Date

8/22/2014

Case #

A-14-705993-B

Assigned to Judge

Denton, Mark R.

Filings

Filing Type

EFileAndServe

Filing Code

Stipulated Protective Order - SPO (CIV)

Filing Description

Stipulated Protective Order

Client Reference Number

200349

Filing on Behalf ofFirst 100 LLC,1st One Hundred Holdings
LLC**Filing Status**

Accepted

Accepted Date

1/28/2020 8:05 AM PST

Lead Document

File Name	Description	Security	Download
Stipulated Protective Order - First 100, LLC.pdf	Stipulated Protective Order - SPO (CIV)		Original File Court Copy

eService Details

Status**Name****Firm****Served****Date Opened**

Status	Name	Firm	Served	Date Opened
Sent	"Andrea Eshenbaugh, Secretary" .		Yes	1/28/2020 6:52 AM PST
Sent	Allyson R. Noto .		Yes	Not Opened
Sent	Brody Wight .		Yes	Not Opened
Sent	Charity Johnson .		Yes	Not Opened
Sent	Danielle Barraza .		Yes	Not Opened
Sent	David R. Koch .		Yes	Not Opened
Sent	Jason Maier .		Yes	Not Opened
Sent	Joseph Gutierrez .		Yes	Not Opened
Sent	Mark J. Gardberg .		Yes	Not Opened
Sent	Natalie D. Vazquez .		Yes	Not Opened
Sent	Robert Hernquist .		Yes	Not Opened
Sent	Steven B. Scow .		Yes	Not Opened
Sent	Zach Takos .		Yes	1/27/2020 6:52 PM PST

Parties with No eService

Name
First 100 LLC

Address

Name
1st One Hundred Holdings LLC

Address

Name
First 100 LLC

Address

Name
Kregg Hale

Address

Name
XRiver Properties LLC

Address

Name
Joel Just

Address

Name
Joel Just

Address

Name
Eagle Rock Asset Management LLC

Address