

IN THE SUPREME COURT OF THE STATE OF NEVADA

THOMAS A. PICKENS,
INDIVIDUALLY AND AS TRUSTEE
OF THE LV BLUE TRUST,

Appellant,

vs.

DR. DANKA K. MICHAELS,
INDIVIDUALLY AND AS TRUSTEE
OF THE MICH-MICH TRUST,

Respondent;

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Elizabeth A. Brown
Clerk of Supreme Court

S.C. DOCKET NO.: 83491
D.C. Case No. D-17-560737-D

APPENDIX

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ATTORNEYS FOR APPELLANT

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Plaintiff’s Trial Exhibit 50 - 2015 1065 Income Tax Return for Patience One LLC	02/14/2020	XXVIII/ AA06590-06672
Plaintiff’s Trial Exhibit 51 - 2016 1065 Income Tax Return for Patience One LLC	02/14/2020	XXVIII/ AA06673-06691
Plaintiff’s Trial Exhibit 52 - 2008 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXVIII/ AA06692- XXIX/ AA06759
Plaintiff’s Trial Exhibit 53 - 2009 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06760-06832
Plaintiff’s Trial Exhibit 54 - 2010 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06833-06862
Plaintiff’s Trial Exhibit 55 - 2011 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06863-06912
Plaintiff’s Trial Exhibit 56 - 2012 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06913-06930
Plaintiff’s Trial Exhibit 57 - 2013 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06931-06962
Plaintiff’s Trial Exhibit 58 - 2014 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXIX/ AA06963-06998

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Plaintiff's Trial Exhibit 60 - 2016 1120 Income Tax Return for Blue Point Development LLC	02/14/2020	XXX/AA07000
Plaintiff's Trial Exhibit 63 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 05/29/2014 through 12/31/2014	02/14/2020	XXX/AA07001- 07002
Plaintiff's Trial Exhibit 65 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 01/01/2015 through 12/31/2015	02/14/2020	XXX/AA07003- 07006
Plaintiff's Trial Exhibit 67 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 01/01/2016 through 12/31/2016	02/14/2020	XXX/AA07007- 07008
Plaintiff's Trial Exhibit 69 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 01/01/2017 through 12/31/2017	02/14/2020	XXX/AA07009- 07010
Plaintiff's Trial Exhibit 70 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 01/01/2018 through 12/31/2018	02/14/2020	XXX/AA07011
Plaintiff's Trial Exhibit 71 - Wells Fargo Business Checking #9112 titled in the name of Blue Point Development 01/01/2019 through 04/30/19	02/14/2020	XXX/AA07012- 07013
Plaintiff's Trial Exhibit 74 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 07/01/2014 through 12/31/14	02/14/2020	XXX/AA07014

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Plaintiff's Trial Exhibit 78 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2016 through 12/31/16	02/14/2020	XXX/AA07017- 07050
Plaintiff's Trial Exhibit 79 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2017 through 12/31/17	02/14/2020	XXX/AA07051
Plaintiff's Trial Exhibit 80 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2018 through 04/30/18	02/14/2020	XXX/AA07052
Plaintiff's Trial Exhibit 82 - American Express Statements #72004 Thomas Pickens card #72004 Danka Michaels card #72020 12/30/10 through 12/15/11	02/14/2020	XXX/AA07053
Plaintiff's Trial Exhibit 83 - American Express Statements #72004 Thomas Pickens card #72004 Danka Michaels card #72020 12/16/11 through 12/14/12	02/14/2020	XXX/AA07054- 07057
Plaintiff's Trial Exhibit 84 - American Express Statements #72004 Thomas Pickens card #72004 Danka Michaels card #72020 12/15/12 through 12/15/13	02/14/2020	XXX/AA07058
Plaintiff's Trial Exhibit 85 - American Express Statements #72004 Thomas Pickens card #72004 Danka Michaels card #72020 12/16/13 through 12/15/14	02/14/2020	XXX/AA07059

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Plaintiff's Trial Exhibit 87 - American Express Statements #72004 Thomas Pickens card #72004 #73002 Danka Michaels card #72020 12/16/15 through 12/15/16	02/14/2020	XXX/AA07061-07092
Plaintiff's Trial Exhibit 88 - American Express Statements #72004 Thomas Pickens card #73002 Danka Michaels card #72020 12/16/16 through 12/15/17	02/14/2020	XXX/AA07093-07095
Plaintiff's Trial Exhibit 89 - American Express Statements #72004 Thomas Pickens card #73002 Danka Michaels card #72020 12/16/17 through 12/15/18	02/14/2020	XXX/AA07096-07204
Plaintiff's Trial Exhibit 90 - American Express Statements #72004 Thomas Pickens card #73002 Danka Michaels card #72020 12/16/18 through 04/14/19	02/14/2020	XXX/AA07205-07228
Plaintiff's Trial Exhibit 93 - Lowes house summary with supporting Wells Fargo Home Mortgage #9607 (PMA #3436) titled in the names of Danka Katarina Michaels and Thomas A. Pickens 07/02/14 through 07/01/2016	02/14/2020	XXX/AA07229-07230
Plaintiff's Trial Exhibit 97 - American Express Statements #63006 titled in the name of Thomas Pickens 12/08/10 through 12/08/11	02/14/2020	XXX/AA07231
Plaintiff's Trial Exhibit 98 - American Express Statements #63006 titled in the name of Thomas Pickens 12/09/11 through 12/07/12	02/14/2020	XXX/AA07232-07236

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Plaintiff's Trial Exhibit 101 - American Express Statements #63006 titled in the name of Thomas Pickens 12/09/14 through 12/08/15	02/14/2020	XXX/AA07248-07250
Plaintiff's Trial Exhibit 102 - American Express Statements #63006 titled in the name of Thomas Pickens 12/09/15 through 12/08/16	02/14/2020	XXXI/AA07251-07255
Plaintiff's Trial Exhibit 103 - American Express Statements #63006 titled in the name of Thomas Pickens 12/09/16 through 12/08/17	02/14/2020	XXXI/AA07256-07258
Plaintiff's Trial Exhibit 104 - American Express Statements #63006 titled in the name of Thomas Pickens 01/08/18 through 12/07/18	02/14/2020	XXXI/AA07259
Plaintiff's Trial Exhibit 105 - American Express Statements #63006 titled in the name of Thomas Pickens 12/08/18 through 05/08/19	02/14/2020	XXXI/AA07260
Plaintiff's Trial Exhibit 106 - American Express #51001 titled in the name of Blue Point Development 12/05/12 through 12/20/13	02/14/2020	XXXI/AA07261-07262
Plaintiff's Trial Exhibit 107 - American Express #51001 titled in the name of Blue Point Development 12/21/13 through 12/19/14	02/14/2020	XXXI/AA07263
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Plaintiff’s Trial Exhibit 111 - American Express #51001 titled in the name of Blue Point Development 12/21/17 through 12/20/18	02/14/2020	XXXII/AA 07686-07687
Plaintiff’s Trial Exhibit 112 - American Express #51001 titled in the name of Blue Point Development 12/21/18 through 04/19/19	02/14/2020	XXXII/AA 07688-07689
Plaintiff’s Trial Exhibit 113 - Bank of America Bank Statements #2561 titled in the name of Blue Point Development 10/29/12 through 02/28/14	02/14/2020	XXXII/AA 07690-07691
Plaintiff’s Trial Exhibit 114 - Bank of America Bank Statements #0222 titled in the name of Patience One LLC 11/01/12 through 12/31/13	02/14/2020	XXXII/AA 07692-07693
Plaintiff’s Trial Exhibit 115 - Wells Fargo Visa #0648 titled in the name of Thomas Pickens 06/06/17 through 12/08/17	02/14/2020	XXXII/AA 07694-07695
Plaintiff’s Trial Exhibit 116 - Wells Fargo Visa #0648 titled in the name of Thomas Pickens 12/09/17 through 12/07/18	02/14/2020	XXXII/AA 07696-07698
Plaintiff’s Trial Exhibit 117 - Wells Fargo Visa #0648 titled in the name of Thomas Pickens 12/08/18 through 05/08/19	02/14/2020	XXXII/AA 07699-07700
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Plaintiff’s Trial Exhibit 119 - Wells Fargo Checking #8952 titled in the name of Thomas Pickens 01/01/19 through 04/30/19	02/14/2020	XXXII/AA 07703-07704
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Plaintiff’s Trial Exhibit 128 - Valic – Danka Michalecko statements 9/30/13, 12/31/13, and 9/30/15	02/14/2020	XXXIII/AA 07770-07772
Plaintiff’s Trial Exhibit 129 - Pinnacle Health Systems – Danka K. Michaels. Statements 9/30/13 and 12/31/13	02/14/2020	XXXIII/AA 07773-07778
Plaintiff’s Trial Exhibit 132 - Danka Michaels Pinnacle Health Systems Statement 7/1/15	02/14/2020	XXXIII/AA 07779-07780
Plaintiff’s Trial Exhibit 133 - Bank of the West – 2015 Porsche statement 12.2.14	02/14/2020	XXXIII/AA 07781-07841
Plaintiff’s Trial Exhibit 134 - Life Insurance Statement 11/25/15	02/14/2020	XXXIII/AA 07842-07849
Plaintiff’s Trial Exhibit 138 - Thomas Pickens UBS Retirement statements dated June 2017 and October-December 2017 (Supplemental Response to Request for Production No. 16.)	02/14/2020	XXXIII/AA 07850-07857
Plaintiff’s Trial Exhibit 144 - JP Morgan Statements, Danka K. Michaels IRA, August 31, 2019 through September 30, 2019	02/14/2020	XXXIII/AA 07858-07866
Plaintiff’s Trial Exhibit 146 - Plaintiff email dated April 3, 2014	02/14/2020	XXXIII/AA 07867-07919
Plaintiff’s Trial Exhibit 147 - Plaintiff email dated August 26, 2014	02/14/2020	XXXIII/AA 07920-07922
Plaintiff’s Trial Exhibit 148 - Plaintiff email dated May 22, 2013	02/14/2020	XXXIII/AA 07923-07930
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Plaintiff’s Trial Exhibit 152 - Plaintiff email dated December 2, 2016	02/14/2020	XXXIII/AA 07999- XXXIV/AA 08018
Plaintiff’s Trial Exhibit 153 - Plaintiff email dated June 30, 2014	02/14/2020	XXXIV/AA 08019-08202
Plaintiff’s Trial Exhibit 154 - #002651 Emails between Dr. Michaels and R. Semonian	02/21/2020	XXXIV/AA 08203-08209
Plaintiff’s Trial Exhibit 155 – NV Prescription Monitoring Program	02/21/2020	XXXIV/AA 08210-08247
Plaintiff’s Trial Exhibit 156 – Request to appeal denial of unemployment benefits	02/21/2020	XXXIV/AA 08248
Defendant’s Trial Exhibit A – Plaintiff’s Response to Defendant’s First Request for Production of Documents and Tangible Things from Plaintiff (with certain attachments thereto)	02/14/2020	XXXIV/AA 08249
Defendant’s Trial Exhibit C – Documentation of \$450,000 loan taken by Danka K. Michaels, M.D., PC for tenant improvements	02/14/2020	XXXIV/AA 08250- XXXV/AA 08257
Defendant’s Trial Exhibit G – Records produced by Equity Title, LLC, in response to Subpoena Duces Tecum for Blue Mesa property (Affidavit and relevant documents)	02/14/2020	XXXV/AA 08258-08270
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Appendix of Exhibits in Support of Defendant’s Motion to Compel Discovery Responses	04/22/2019	II/AA00398-00440
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Appendix of Exhibits to Plaintiff's Opposition to Defendant's Motion for Summary Judgement, to Dismiss, for Protective Order and for Attorney Fees and Countermotion 1) to Dismiss or, in the Alternative, for Summary Judgement as to Defendant's Causes of Action for Intentional Misrepresentation/Fraud; Negligent Misrepresentation; Breach of Implied Covenant of Good Faith and Fair Dealing; Promissory Estoppel; Express Agreement; Implied Agreement; and Malicious Abuse of Process; (2) for Summary Judgement Setting Aside Deeds of Real Property and Assignment of LLC Interest; and (3) for Permission to Submit Points and Authorities in Excess of 30 Pages Pursuant to EDCR 5.503(e)	08/19/2019	V/AA00763-00813
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Defendant's Trial Exhibit C – Documentation of \$450,000 loan taken by Danka K. Michaels, M.D., PC for tenant improvements	02/14/2020	XXXIV/AA 08250-XXXV/AA 08257
Defendant's Trial Exhibit G – Records produced by Equity Title, LLC, in response to Subpoena Duces Tecum for Blue Mesa property (Affidavit and relevant documents)	02/14/2020	XXXV/AA 08258-08270
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Plaintiff's Objection to Defendant Danka K. Michaels' Memorandum of Fees and Costs	09/07/2021	XIII/AA02823-02854
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Plaintiff's Request for the Court to Take Judicial Notice Pursuant to NRS 47.130	04/23/2021	XI/AA02407-02424
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Plaintiff’s Trial Exhibit 116 - Wells Fargo Visa #0648 titled in the name of Thomas Pickens 12/09/17 through 12/07/18	02/14/2020	XXXII/AA 07696-07698
Plaintiff’s Trial Exhibit 117 - Wells Fargo Visa #0648 titled in the name of Thomas Pickens 12/08/18 through 05/08/19	02/14/2020	XXXII/AA 07699-07700
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Plaintiff’s Trial Exhibit 127 - Southwest Pension Services – Danka Michaels. Statements 09/03/2013 and 12/31/13	02/14/2020	XXXII/AA 07708- XXXIII/AA 07769
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Plaintiff’s Trial Exhibit 133 - Bank of the West – 2015 Porsche statement 12.2.14	02/14/2020	XXXIII/AA 07781-07841
Plaintiff’s Trial Exhibit 134 - Life Insurance Statement 11/25/15	02/14/2020	XXXIII/AA 07842-07849
Plaintiff’s Trial Exhibit 138 - Thomas Pickens UBS Retirement statements dated June 2017 and October-December 2017 (Supplemental Response to Request for Production No. 16.)	02/14/2020	XXXIII/AA 07850-07857
Plaintiff’s Trial Exhibit 14 - 2010 1040 Income Tax Return for Thomas A. Pickens	02/14/2020	XV/AA03263- 03319
Plaintiff’s Trial Exhibit 144 - JP Morgan Statements, Danka K. Michaels IRA, August 31, 2019 through September 30, 2019	02/14/2020	XXXIII/AA 07858-07866
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Plaintiff’s Trial Exhibit 15 - 2011 1040 Income Tax Return for Thomas A. Pickens	02/14/2020	XV/AA03320- 03372
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Plaintiff's Trial Exhibit 153 - Plaintiff email dated June 30, 2014	02/14/2020	XXXIV/AA 08019-08202
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Plaintiff's Trial Exhibit 21 - 2005 1040 Income Tax Return for Danka Michaels	02/14/2020	XVI/AA03640- 03735
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Plaintiff’s Trial Exhibit 40 - 2011 1120S Income Tax Return for Danka K. Michaels MD, PC	02/14/2020	XXIII/AA05392- 05488
Plaintiff’s Trial Exhibit 41 - 2012 1120S Income Tax Return for Danka K. Michaels MD, PC	02/14/2020	XXIII/AA05489- XXIV/AA05577
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Plaintiff’s Trial Exhibit 45 - 2016 1120S Income Tax Return for Danka K. Michaels MD, PC	02/14/2020	XXV/AA05803- 05934
Plaintiff’s Trial Exhibit 46 - 2017 1120S Income Tax Return for Danka K. Michaels MD, PC	02/14/2020	XXV/AA005935- XXVI/AA06106
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Plaintiff’s Trial Exhibit 78 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2016 through 12/31/16	02/14/2020	XXX/AA07017-07050
Plaintiff’s Trial Exhibit 79 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2017 through 12/31/17	02/14/2020	XXX/AA07051
Plaintiff’s Trial Exhibit 8 - Certificate of Custodian of Records for Ticor Title of Nevada—purchase of 7608 Lowe Avenue, Las Vegas, Nevada 89131 on February 28, 2011	02/14/2020	XIV/AA03151-03164
Plaintiff’s Trial Exhibit 80 - Wells Fargo Checking ending 3436 titled in the names of Thomas A. Pickens and Danka K. Michaels 01/01/2018 through 04/30/18	02/14/2020	XXX/AA07052

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Plaintiff's Trial Exhibit 93 - Lowes house summary with supporting Wells Fargo Home Mortgage #9607 (PMA #3436) titled in the names of Danka Katarina Michaels and Thomas A. Pickens 07/02/14 through 07/01/2016	02/14/2020	XXX/AA07229-07230
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Transcript RE: Non-Jury Trial Day 3	10/28/2021	XIII/AA02957- XIV/AA03007
Transcript RE: Non-Jury Trial Day 4	10/28/2021	XIV/AA03008- 03040
Transcript RE: Non-Jury Trial Day 5	10/28/2021	XIV/AA03041- 03054
Trial Subpoena	01/29/2020	V/AA00906- 00909
Trial Subpoena Robert Semonian	01/28/2020	V/AA00892- 00898
Trial Subpoena Shannon L. Evans, Esq.	01/28/2020	V/AA00899- 00905

MEMORANDUM OF POINTS AND AUTHORITIES

I. DANKA SHOULD BE AWARDED ALL OF HER ATTORNEY’S FEES AND COSTS.

A. Danka Is The Prevailing Party.

This case came on for a non-jury trial as to all issues between the parties on February 14, 2020, February 27, 2020, March 5, 2021, March 12, 2021 and concluded on April 2, 2021. The Court entered its Findings of Fact, Conclusions of Law and Judgment filed on August 3, 2021 wherein it ordered that Defendant Danka Michaels (“Dr. Michaels”) was determined to be the prevailing party and would be awarded her attorney’s fees and costs. Specifically, the Court ordered:

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Dr. Michaels is determined to be the prevailing party in this matter. Dr. Michaels awarded attorney fees and costs subject to application for the relief and information provided therein. Counsel for Dr. Michaels shall submit the appropriate memorandum of fees and costs setting forth their analysis under Brunzell and shall also submit their redacted billing statements in accordance with Love within twenty days following the Notice of Entry of Order of the Findings of Fact, Conclusions of Law, and Judgment.

See Findings of Fact, Conclusions of Law, and Judgment filed on August 3, 2021 at page 31, lines 3 – 10.

B. *Brunzell* Analysis.

Regarding the required analysis under *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969), it is respectfully submitted as follows:

1. *The Qualities of the Advocate: ability, training, education, experience, professional standing, skill.*

1 Attorney Jennifer V. Abrams graduated magna cum laude in the top 4% of her law
2 school class. She is a member in good standing of the State Bar of Nevada, Clark County
3 Bar Association, American Bar Association, American Association for Justice, which is
4 formerly the Association of Trial Lawyers of America, the State Bar of California and
5 the Louisiana State Bar (both inactive). Although Attorney Abrams is admitted to
6 practice law in three states, she chooses to dedicate herself exclusively to Las Vegas
7 divorce and family law matters. Attorney Abrams served as a member of the State Bar
8 of Nevada Family Law Executive Council for five (5) years and was the Treasurer for
9 the section for four (4) of those years. She is Certified by the State Bar of Nevada as a
10 Family Law Specialist and is a peer-reviewed and certified Fellow of the American
11 Academy of Matrimonial Lawyers. She was appointed by the Nevada Supreme Court
12 to the Family Law Rules Committee. She has contributed as an author and editor to
13 several State Bar publications, including, the Family Practice Manual (second edition)
14 and she created the Detailed Financial Disclosure Form for high asset and complex
15 divorce cases which has been adopted for new cases filed after January 1, 2013. See
16 ADKT 476. She was on the committee that re-wrote Section 5 of the Eighth Judicial
17 District Court Rules and she re-drafted Nevada Rule of Civil Procedure 16.2 and 16.205.

18 Stephanie Stolz is the current Firm Administrator / Lead Certified Paralegal and
19 began her legal career at The Abrams Law Firm 17 years ago. She started at the
20 receptionist position in May 2004. While working full-time for the firm, she
21 simultaneously completed the Paralegal Studies Program with special emphasis in

1 Nevada Practices and Procedures, Contract Law, and Family Law from the University
2 of Nevada Las Vegas. In 2005 she was promoted to a Certified Paralegal position. In
3 2006 she achieved the role of Lead Certified Paralegal. Stephanie was promoted to the
4 role of Firm Administrator in 2010. In addition to her Lead Certified Paralegal duties,
5 she is responsible for numerous areas of the firm's business operations including
6 accounting and vendor relationships. Stephanie is also certified through NAL.

7 Attorney Shawn M. Goldstein is AV-Preeminent rated by Martindale Hubbell and
8 has been practicing law since 2006, almost exclusively in family law matters. He is the
9 principal and founder of Goldstein Law Ltd. a law firm specializing in family law
10 matters. Prior to starting his own firm, Mr. Goldstein was a partner with James J.
11 Jimmerson at Jimmerson Hansen, P.C. (now known as The Jimmerson Law Firm, P.C.),
12 an AV-rated law firm, where he consistently practiced at the highest levels of family law
13 cases in the state. During his time at Jimmerson Hansen, P.C., and now at his own firm,
14 Mr. Goldstein has represented several of the most high-profile people in Nevada, and
15 was part of the trial team that tried what is believed to be the longest family law trial in
16 the history of the State which resulted in the largest attorney's fees award in a family
17 law matter all of which was upheld upon appeal by the Nevada Supreme Court. Mr.
18 Goldstein is certified by the State Bar of Nevada as a Family Law Specialist, has been
19 voted as one of the Top 100 lawyers in Las Vegas by MyVegas Magazine, has been
20 recognized by the Legal Aid Center of Southern Nevada for his pro bono contributions,
21 and has presented numerous times at the annual State Bar Family Law conferences. Mr.

1 Goldstein is believed to be respected by his peers in the family law bar and by the judges
2 on the family law bench.

3 2. *The Character of the Work to be Done: difficulty, intricacy,*
4 *importance, time and skill required, responsibility imposed and the prominence*
5 *and character of the parties where they affect the importance of the litigation.*

6 This was not an ordinary, run-of-the-mill divorce case. Indeed, this was not a
7 divorce case at all. The issues and claims raised were difficult and complex as Dr.
8 Michaels was forced to prove there was no marriage and that Mr. Pickens was not a
9 putative spouse. Further, Mr. Pickens raised all sorts of other claims to try anything he
10 could to squeeze money out of Dr. Michaels including alleged breach of fiduciary
11 duties, breach of the doctor/patient relationship, and other novel claims not raised in the
12 ordinary family law case. Refuting all of Mr. Pickens claims took a substantial amount
13 of work, both legally in the form of research and briefing, and factually in the form of
14 discovery, documents, depositions, and trial. Dr. Michaels is a well-respected physician
15 in the community and Mr. Pickens purports to be a successful developer who worked
16 for major casinos and significant members of the Las Vegas community. There were
17 millions of dollars at stake in this litigation.

18 3. *The Work Actually Performed by the Lawyer: the skill, time and*
19 *attention, given to the work.*

20 The work was substantial and the skill, time, and attention given to the work was
21 significant. The Abrams & Mayo Law Firm dedicated years to this case and, when
undersigned counsel became involved, he spent a significant amount of time preparing

1 this matter for trial. As a review of the billing statements will show, there was
2 substantial discovery involved, significant motion practice, multiple depositions,
3 thousands of pages of documents disclosed, 5 days of trial the majority of which was
4 during the deepest throws of the worst pandemic in over 100 years, significant legal
5 research and briefing, written closings, and proposed findings. Counsel respectfully
6 submits that the work that done in this case required the level of skill that comes from
7 both of Dr. Michaels counsel being State Bar certified family law specialists and AV
8 rated attorneys. This was not a case that just any attorneys could take on.

9 4. *The Result: whether the attorney was successful and what benefits*
10 *were derived.*

11 The result is clear and obvious: Dr. Michaels prevailed on all aspects of this case.
12 This should have been clear to Mr. Pickens from the beginning, but his greed would not
13 let him resolve this matter without demanding millions of dollars from Dr. Michaels.
14 The benefits to Dr. Michaels are clear and worth millions of dollars – Mr. Pickens will
15 not be awarded one-half of the commercial building, the rental properties, the residence,
16 or her medical practice, etc.

17 **C. Redacted Statements Submitted In Accordance With *Love*.**

18 In accordance with *Love v. Love*, 114 Nev. 572, 959 P.2d 523 (1998), counsel for
19 Dr. Michaels has submitted redacted billing statements in support of her award of fees
20 and costs. Attached as Exhibit “A” is the Declaration of Shawn M. Goldstein, Esq. along
21 with the redacted billing statements for the work performed by Mr. Goldstein and his

1 firm. The attorney's fees incurred by Dr. Michaels with Goldstein Law Ltd. total
2 \$95,802.50, although there was "NO CHARGE" time of \$4,360.00 resulting in total
3 fees billed to Dr. Michaels of \$91,442.50 plus \$3.50 in costs for a total of **\$91,446.00**.
4 Attached as Exhibit "B" is the Declaration of Jennifer V. Abrams, Esq. along with the
5 redacted billing statements for the work performed by Ms. Abrams and her firm. The
6 total amount of fees and costs incurred by Dr. Michaels with The Abrams & Mayo Law
7 Firm is \$173,315.50 plus \$4,146.69 in costs for a total of **\$177,462.19**. The grand total
8 of fees and costs sought by Dr. Michaels is **\$268,908.19**, plus applicable interest.

9 **D. FEES INCURRED BY MR. PICKENS – REASONABLENESS.**

10 The Court's award of attorney's fees and costs to Dr. Michaels must be reasonable.
11 One measure of reasonableness that the Court may consider is the amount of attorney's
12 fees and costs incurred by Mr. Pickens in this matter. The Court will recall that Mr.
13 Pickens testified at trial on March 12, 2021 that he paid his counsel \$105,000 and owed
14 them another approximately \$180,000¹. Specifically, Mr. Pickens testified on March
15 12, 2021 as follows:

16 *Beginning at 00:52:10*

17 Mr. Goldstein: Okay. So how much have you paid your lawyers to-date in this case?

18 Mr. Pickens: To-date?

19 Mr. Goldstein: In this case.

20 Mr. Pickens: To-date, correct?

21 ¹ Upon information and belief, the outstanding approximately \$180,000 was through February 2021 as Mr. Pickens' counsel bills monthly and February was the most recent month before his March 12, 2021 testimony.

1 Mr. Goldstein: Up until today.
Mr. Pickens: I think-

2
3 Mr. Jones: Can I just ask for some clarification? He had a different lawyer in the
civil case.

4 Mr. Goldstein: I asked him this case to-date.
5 Mr. Jones: Okay, just this case.

6 Judge Steel: All the lawyers you've had, how much have you paid?
7 Mr. Goldstein: In this case, to-date.

8 Mr. Pickens: All the lawyers I've had.
Mr. Jones: In this case, in the divorce, family law case.

9 Mr. Pickens: 105. I think that's the number. I'm not exactly sure.

10 Mr. Goldstein: Approximately a 105?
Mr. Pickens: Yeah.

11 Mr. Goldstein: All right. And do you know approximately how you owe?
12 Mr. Pickens: Probably another \$180,000, something like that.

13 Mr. Goldstein: You owe the Jones and LoBello law firm a 180,000?
14 Mr. Pickens: Again, I'm thinking that's probably what it is.

15 *Beginning at 01:01:06*

16 Mr. Goldstein: Just back from the attorney's fees issue. You indicated in your
17 testimony that there were cases. And so I asked you about how much
fees and costs you incurred in this case. But I assume by your answer
you're referencing the other pending civil matter as well?

18 Mr. Pickens: That's correct.

19 Mr. Goldstein: All right. And just how much have you incurred in that case?
Mr. Pickens: I think I've paid-

20 Mr. Goldstein: I'm sorry. How much have you paid to-date?
21 Mr. Pickens: 45,000 with another 45,000 outstanding. I believe that's the numbers,
I can't swear to that.

1 Mr. Goldstein: So approximately a total of 90,000 incurred. Half being paid in the
2 civil case and then in this case a total of approximately 285,000, with
a 105,000 actually being paid.

3 Mr. Pickens: That's what I believe, correct.

4 Mr. Goldstein: So your total payments are, between both cases, is a 150,000?

5 Mr. Pickens: What's that? That's correct.

6 Mr. Goldstein: Okay.

7 Mr. Pickens: Paid.

8 Mr. Goldstein: Approximately. And have you paid all of those payments with cash?

9 Mr. Pickens: I paid it with a credit card which means I had to pay it with cash.

10 Mr. Goldstein: So you don't have any balances still from attorney's fees left on your
credit cards?

11 Mr. Pickens: No, it's paid every month.

12 Comparatively, through February 28, 2021 Dr. Michael's fees and costs incurred was
13 \$34,207.50 for Goldstein Law Ltd. and \$132,241.19 for The Abrams & Mayo Law Firm
14 which totals \$166,448.69 and is \$118,551.31 LESS than the \$285,000 incurred by Mr.
15 Pickens incurred during the same time period through February 28, 2021. Indeed, even
16 with all of the substantial work done after February 28, 2021 which includes: all three
17 trial days of March 5, 12, and April 2, 2021, the preparation of a substantial 62-page
18 EDCR 7.27 Brief, the preparation of a substantial 28-page written Closing Argument,
19 the preparation of a detailed 24-page proposed Findings of Fact, Conclusions of Law,
20 Decree and Judgment, among other substantial work, the total fees and costs incurred
21 by Dr. Michaels through the preparation of this Memorandum on August 25, 2021 is

1 \$268,908.19 which is still over \$16,000 LESS than the \$285,000 in fees Mr. Pickens
2 incurred as of February 28, 2021. Simply put, Dr. Michaels incurred less in fees for the
3 entire case than Mr. Pickens did for just the first half of the case.

4 **E. OFFERS OF JUDGMENT – REJECTED BY MR. PICKENS.**

5 The Court must also now be made aware that Dr. Michaels served Mr. Pickens
6 with an Offer of Judgment on June 24, 2019 (“OOJ #1”) in an effort to resolve the
7 matter. See Offer of Judgment #1 attached as Exhibit “C”. Mr. Pickens did not accept
8 or otherwise respond to OOJ #1. The Court will note that Dr. Michaels offered, among
9 other things, to end the matter upon payment from Mr. Pickens of \$20,000.00. At the
10 time of the expiration of OOJ #1, the fees and costs incurred by Dr. Michaels was
11 \$49,728.09.

12 Dr. Michaels again tried to resolve this matter by way of a second Offer of
13 Judgment (“OOJ #2”) served on Mr. Pickens on November 21, 2019. Mr. Pickens also
14 did not accept this OOJ #2. See Offer of Judgment #2 attached as Exhibit “D”. The
15 terms of this OOJ #2 was essentially a walk-away for both parties. At the time of the
16 expiration of OOJ #2, the fees and costs incurred by Dr. Michaels was \$67,671.19.

17 NRCP 68 provides:

18 Rule 68. Offers of Judgment:

19 (a) The Offer. At any time more than 21 days before trial, any party may serve
20 an offer in writing to allow judgment to be taken in accordance with its terms
21 and conditions. Unless otherwise specified, an offer made under this rule is an
offer to resolve all claims in the action between the parties to the date of the

offer, including costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees.

(b) Apportioned Conditional Offers. An apportioned offer of judgment to more than one party may be conditioned upon the acceptance by all parties to whom the offer is directed.

(c) Joint Unapportioned Offers.

(1) Multiple Offerors. A joint offer may be made by multiple offerors.

(2) Offers to Multiple Defendants. An offer made to multiple defendants will invoke the penalties of this rule only if:

(A) there is a single common theory of liability against all the offeree defendants, such as where the liability of some is entirely derivative of the others or where the liability of all is derivative of common acts by another; and

(B) the same entity, person, or group is authorized to decide whether to settle the claims against the offerees.

(3) Offers to Multiple Plaintiffs. An offer made to multiple plaintiffs will invoke the penalties of this rule only if:

(A) the damages claimed by all the offeree plaintiffs are solely derivative, such as where the damages claimed by some offerees are entirely derivative of an injury to the others or where the damages claimed by all offerees are derivative of an injury to another; and

(B) the same entity, person, or group is authorized to decide whether to settle the claims of the offerees.

(d) Acceptance of the Offer and Dismissal or Entry of Judgment.

(1) Within 14 days after service of the offer, the offeree may accept the offer by serving written notice that the offer is accepted.

(2) Within 21 days after service of written notice that the offer is accepted, the obligated party may pay the amount of the offer and obtain dismissal of the claims, rather than entry of a judgment.

(3) If the claims are not dismissed, at any time after 21 days after service of written notice that the offer is accepted, either party may file the offer and notice of acceptance together with proof of service. The clerk must then enter judgment accordingly. The court must allow costs in accordance with NRS 18.110 unless the terms of the offer preclude a separate award of costs. Any judgment entered under this section must be expressly designated a compromise settlement.

(e) Failure to Accept Offer. If the offer is not accepted within 14 days after service, it will be considered rejected by the offeree and deemed withdrawn by the offeror. Evidence of the offer is not admissible except in a proceeding to determine costs, expenses, and fees. The fact that an offer is made but not accepted does not preclude a subsequent offer. With offers to multiple offerees, each offeree may serve a separate acceptance of the apportioned offer, but if the offer is not accepted by all offerees, the action will proceed as to all. Any offeree who fails to accept the offer may be subject to the penalties of this rule.

(f) Penalties for Rejection of Offer.

(1) In General. If the offeree rejects an offer and fails to obtain a more favorable judgment:

(A) the offeree cannot recover any costs, expenses, or attorney fees and may not recover interest for the period after the service of the offer and before the judgment; and

(B) the offeree must pay the offeror's post-offer costs and expenses, including a reasonable sum to cover any expenses incurred by the offeror for each expert witness whose services were reasonably necessary to prepare for and conduct the trial of the case, applicable interest on the judgment from the time of the offer to the time of entry of the judgment and reasonable attorney fees, if any be allowed, actually incurred by the offeror from the time of the offer. If the offeror's attorney is collecting a contingent fee, the amount of any attorney fees awarded to the party for whom the offer is made must be deducted from that contingent fee.

(2) Multiple Offers. The penalties in this rule run from the date of service of the earliest rejected offer for which the offeree failed to obtain a more favorable judgment.

(g) How Costs, Expenses, Interest, and Attorney Fees Are Considered. To invoke the penalties of this rule, the court must determine if the offeree failed to obtain a more favorable judgment. If the offer provided that costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, would be added by the court, the court must compare the amount of the offer with the principal amount of the judgment, without inclusion of costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees. If a party made an offer in a set amount that precluded a separate award of costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, the court must compare the amount of the offer, together with the offeree's pre-offer taxable costs,

1 expenses, interest, and if attorney fees are permitted by law or contract,
2 attorney fees, with the principal amount of the judgment.

3 (h) Offers After Determination of Liability. When the liability
4 of one party to another has been determined by verdict, order, or judgment,
5 but the amount or extent of the liability remains to be determined by further
6 proceedings, the party adjudged liable may make an offer of judgment, which
7 has the same effect as an offer made before trial if it is served within a
8 reasonable time not less than 14 days before the commencement of hearings
9 to determine the amount or extent of liability.

10 [Amended; effective March 1, 2019.]

11 According to NRCP 68(g), “to invoke the penalties of this rule, the court must determine
12 if the offeree failed to obtain a more favorable judgment.” Additionally, pursuant to
13 NRCP 68(f)(2), “the penalties in this rule run from the date of service of the **earliest**
14 rejected offer for which the offeree failed to obtain a more favorable judgment.”
15 (emphasis added). Here, it cannot be disputed that Mr. Pickens did not obtain a more
16 favorable judgment than what Dr. Michael’s offered in her OOJ #1. Dr. Michael’s OOJ
17 #1 included a clause that states, “It is intended that this Offer is inclusive of all accrued
18 interest, costs, attorney’s fees, expert fees and any other sums that could be claimed in
19 the above-captioned action.” Accordingly, “If a party made an offer in a set amount that
20 precluded a separate award of costs, expenses, interest, and if attorney fees are permitted
21 by law or contract, attorney fees, the court must compare the amount of the offer,
together with the offeree’s pre-offer taxable costs, expenses, interest, and if attorney
fees are permitted by law or contract, attorney fees, with the principal amount of the
judgment.” Comparing the judgment with Dr. Michael’s pre-offer fees and costs of
\$49,728.09, it is clear that Mr. Pickens did not obtain a more favorable judgment. Since

1 Mr. Pickens rejected that OOI #1, and he did not obtain a more favorable judgment, the
2 Court must invoke the penalty provisions of NRCP 68(f)(1)(B) and award Dr. Michaels
3 her attorney's fees and costs.

4 Mr. Pickens actually served Dr. Michaels with his own Offer of Judgment on
5 December 9, 2019 which Dr. Michaels rejected. See Mr. Pickens Offer of Judgment
6 attached as Exhibit "E". The Court will note that Mr. Pickens demanded that Dr.
7 Michaels pay him the sum of One Million Three Hundred Thousand Dollars
8 (\$1,300,000)! Mr. Pickens OOI shows just how unreasonable he has been in his
9 positions in this case.

10 The Nevada Supreme Court also addressed certain factors for the district court to
11 consider when evaluating an offer of judgment in *Beattie v. Thomas*, 668 P.2d 268, 99
12 Nev. 579 (Nev. 1983) as follows: (1) whether the plaintiff's claim was brought in good
13 faith; (2) whether the defendants' offer of judgment was reasonable and in good faith in
14 both its timing and amount; (3) whether the plaintiff's decision to reject the offer and
15 proceed to trial was grossly unreasonable or in bad faith; and (4) whether the fees sought
16 by the offeror are reasonable and justified in amount. Although *Beattie* was decided
17 approximately 38 years ago, and although NRCP 68 was amended only 2 years ago, Dr.
18 Michaels will nevertheless analyze the *Beattie* factors out of an abundance of caution
19 as set forth below. As the Court is intimately familiar with this matter, and in an effort
20 to avoid rehashing the full history of this case, only the most salient points will be
21 summarized.

1 *1. Whether The Plaintiff's Claim Was Brought In Good Faith.*

2 There is overwhelming evidence that Mr. Pickens' claim was not brought in good
3 faith. He acknowledged in writing, under oath, year after year, that the parties were not
4 legally married by preparing and signing U.S. Federal Income Tax Returns as a "single,
5 unmarried" individual. Furthermore, he prepared and signed off on his estate planning
6 documents as a single – not a married – man. He told multiple professionals, and even
7 his own friend, all of whom testified at trial that Mr. Pickens told them he was not
8 legally married.

9 Mr. Pickens also understood in 2016 that a divorce would not be necessary to
10 divide assets, so he paid attorney Shannon Evans to prepare the transfer documents. He
11 knowingly and voluntarily signed off on the deeds and related documents to effectuate
12 the transfer of assets and then he and Dr. Michaels went their separate ways. Months
13 later, Mr. Pickens purchased real property as a single, unmarried man.

14 More than a year after the final breakup, Mr. Pickens falsely alleged that he and
15 Dr. Michaels were married in a purported "Complaint for Divorce" filed October 24,
16 2017. The contents of that Complaint for Divorce were very telling as to what Mr.
17 Pickens "knew" at the time he falsely alleged there was a marriage. In the thousands of
18 divorce filings, it is rare for a Marriage Certificate to be attached to a Complaint for
19 Divorce and for allegations that the marriage was "valid" to be included in the averions.
20 After the filing of his original Complaint for Divorce, Mr. Pickens amended his
21 complaint twice then suggested during trial that it would be amended a third time (i.e.,

1 so he could take a fourth shot at making a claim against Dr. Michaels, although he did
2 not do so) to once again include a cause of action for “divorce.”

3 *2. Whether The Defendants' Offer Of Judgment Was Reasonable And In*
4 *Good Faith In Both Its Timing And Amount.*

5 Dr. Michaels’ Offers of Judgment were reasonable in both the timing and the
6 amount. As noted in her OOJ #1, she was willing to absorb \$49,728.09 of fees that she
7 never should have had to incur, if Tom would pay \$20,000. In her OOJ #2, Dr. Michaels
8 was not asking Tom to pay any of the \$67,671.19 she incurred in fees to that date. To
9 be clear, that was just the amount Dr. Michaels paid out of pocket – her losses were
10 significantly more than that from time missed at work due to Mr. Pickens’ frivolous
11 filings. In addition to meetings with counsel, responding to discovery, attending court
12 hearings, reviewing filings, etc. Mr. Pickens’ counsel noticed Dr. Michaels’ deposition
13 4 times, and canceled at the last minute on several occasions. Mr. Pickens was even able
14 to prepare and serve his own OOJ so the timing of Dr. Michaels OOJs was certainly
15 made in good faith.

16 *3. Whether The Plaintiff's Decision To Reject The Offer And Proceed To*
17 *Trial Was Grossly Unreasonable Or In Bad Faith.*

18 Mr. Pickens decision to reject the offer and proceed to trial was grossly
19 unreasonable and in bad faith. He was aggressively trying to extract money from Dr.
20 Michaels with a baseless lawsuit. He knew the parties were not married and that there
21 was no legitimate basis to set aside the deeds and transfer documents. He testified at his
deposition that he filed the Complaint because he believed he would owe gift taxes. By
the time of the Offers of Judgment, Mr. Pickens knew he would not owe any gift taxes.

1 Dr. Michaels offer to Mr. Pickens to pay less than half of her attorney's fees in June
2 was reasonable. Her offer in November for Mr. Pickens to pay nothing in attorney's
3 fees to her despite his pursuit of frivolous claims and the \$67,671.19 of fees she incurred
4 as a result was even more fair and, in fact, was a significant financial loss to Dr.
5 Michaels. Mr. Pickens not only rejected these reasonable offers, but he added another
6 line of attack against Dr. Michaels; he began threatening her medical license and
7 reputation, alleging she breached her ethical duties as a physician and making bogus
8 "breach of fiduciary duty" claims against her. Mr. Pickens then served her with an Offer
9 of Judgment (in true extortionist form) requesting \$1,300,000. See Exhibit "E". Mr.
10 Pickens's actions scream of bad faith.

11 *4. Whether The Fees Sought By The Offeror Are Reasonable And*
12 *Justified In Amount.*

13 The fees sought by Danka are reasonable and justified in amount. This Court is
14 aware of the nine (9) binders of exhibits presented by Mr. Pickens at trial. There was a
15 significant amount of discovery, numerous depositions and witnesses, and litigation that
16 was ongoing for almost four years which culminated in 5 days of trial, substantial
17 briefing, written closings, and findings. It is noteworthy that during that time, The
18 Abrams & Mayo Law Firm increased their hourly rates for new clients, but maintained
19 the original (lower) rates for Dr. Michaels. Additionally, The Abrams & Mayo Law
20 Firm gave Dr. Michaels significant discounts on fees incurred to bring co-counsel
21 Shawn M. Goldstein, Esq. up to speed.

1 Assuming the Court finds that Dr. Michaels should be awarded her attorney's fees
2 and costs, it must also include interest as of the date of the earliest offer of judgment.

3 **IV. CONCLUSION.**

4 WHEREFORE, based upon the foregoing, Danka respectfully requests that the
5 Court enter the following orders:

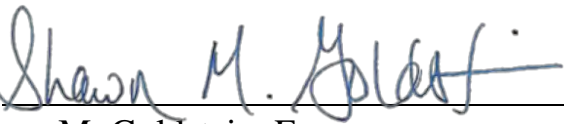
6 1. Confirming the amount awarded to Defendant as and for her attorney's fees
7 and costs in the amount of **\$268,908.19** plus interest.

8 2. Reducing said amount to judgment in favor of Defendant and against
9 Plaintiff;

10 3. For such other and further relief as this Court deems just and necessary.

11 Dated: August 25, 2021.

12 GOLDSTEIN LAW LTD.

13 By: 

14 Shawn M. Goldstein, Esq.

Nevada Bar No. 009814

15 10161 Park Run Dr., STE 150

Las Vegas, Nevada 89145

16 Attorney for Defendant,

Danka K. Michaels

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of GOLDSTEIN LAW LTD., and that on August 25, 2021, I served a true and correct copy of the documents described herein by the method indicated below, and addressed to the following:

Documents served:

Defendant Danka Michael's Memorandum of Fees and Costs

Persons Served:

John D. Jones, Esq.
Jones & LoBello
9950 W. Flamingo Road, Ste. 100
Las Vegas, Nevada 89147

Manner of Service:

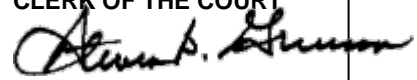
Via Electronic Service through the Court's electronic filing system.

Dated: August 25, 2021

GOLDSTEIN LAW LTD.



Jeanette Lacker



EXHS
GOLDSTEIN LAW LTD.
Shawn M. Goldstein, Esq.
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F: 702.637.4357
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Attorney for Defendant,
Danka K. Michaels

THE ABRAMS & MAYO LAW FIRM
Jennifer V. Abrams, Esq.
Nevada Bar No. 007575
6252 South Rainbow Blvd., STE 100
Las Vegas, Nevada 89118
T: 702.222.4021
F: 702.248.9750
jvagroup@theabramslawfirm.com
Attorney for Defendant

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

THOMAS A. PICKENS, individually,
and as trustee of the LV Blue Trust

Plaintiff,

vs.

DANKA K. MICHAELS, individually,
and as trustee of the Mich-Mich Trust,

Defendants.

CASE NO. D-17-560737-D

DEPT. NO. J

EXHIBIT APPENDIX TO
DEFENDANT DANKA K.
MICHAELS MEMORANDUM OF
FEES AND COSTS

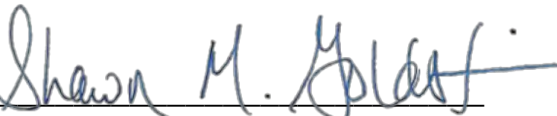
COMES NOW, Defendant, DANKA K. MICHAELS, by and through her attorney of record, Shawn M. Goldstein, Esq. of GOLDSTEIN LAW LTD. and Jennifer V. Abrams, Esq. of The Abrams & Mayo Law Firm and hereby submits her Exhibit Appendix to Memorandum of Fees and Costs as follows:

TABLE OF CONTENTS

1. Exhibit "A" – Declaration of Shawn M. Goldstein, Esq. and the redacted billing statements for GOLDSTEIN LAW LTD., - MEMO 000001 - MEMO 000011;
2. Exhibit "B" - Declaration of Jennifer V. Abrams, Esq. and the redacted billing statements for The Abrams & Mayo Law Firm - MEMO 000012 - MEMO 000163;
3. Exhibit "C" – Defendant's Offer of Judgment served on June 24, 2019 - MEMO 000164 - MEMO 000167;
4. Exhibit "D" – Defendant's Offer of Judgment served on November 21, 2019 - MEMO 000168 - MEMO 000171; and
5. Exhibit "E" – Plaintiff's Offer of Judgment served on December 9, 2019 - MEMO 000172- MEMO 000176.

Dated: August 25, 2021

GOLDSTEIN LAW LTD.

By: 

Shawn M. Goldstein, Esq.
Nevada Bar No. 009814
10161 Park Run Dr., STE 150
Las Vegas, Nevada 89145
Attorney for Defendant,
Danka J. Michaels

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of GOLDSTEIN LAW LTD., and that on August 25, 2021, I served a true and correct copy of the documents described herein by the method indicated below, and addressed to the following:

Documents served:

Exhibit Appendix to Defendant Danka K. Michaels Memorandum of Fees and Costs

Persons Served:

John D. Jones, Esq.
Jones & LoBello, PLLC
9950 W Flamingo Rd, #100
Las Vegas, NV 89147

Manner of Service:

Via Electronic Service through the Court's electronic filing system.

Dated: August 25, 2021

GOLDSTEIN LAW LTD.



Jeanette Lacker

EXHIBIT “A”

DECLARATION OF SHAWN M. GOLDSTEIN, ESQ.

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

Shawn M. Goldstein, Esq. declares and says as follows:

1. That I am a duly licensed attorney in the state of Nevada and the founder of GOLDSTEIN LAW LTD. I am counsel for the Defendant in the action entitled *Pickens vs. Michaels*, Case No. D-17-560737-D and I have personal knowledge as to the facts and circumstances set forth herein (except as to those facts that are stated upon information and belief and as to those facts, I believe them to be true) and I am competent to testify hereto. I submit this Declaration in support of Defendant Danka Michael's Memorandum of Fees and Costs.

2. I prepared the instant Memorandum of Fees and Costs and have personal knowledge of the facts and information stated therein which I believe to be true and correct. The factual statements contained in the Memorandum are adopted and incorporated herein as though fully set forth in this Declaration.

3. I personally prepared the billing invoices for Goldstein Law Ltd. which are attached to the instant Memorandum as Exhibit "A" and I know the same to be true and correct copies thereof.

1 4. I hereby declare under the penalty of perjury that the foregoing is true and
2 correct and submit this Declaration pursuant to, and in accordance with, NRS 53.045.

3 Executed this 25th day of August, 2021.

4
5 
6 SHAWN M. GOLDSTEIN, ESQ.



GOLDSTEIN LAW L T D

10161 Park Run Dr, STE 150
Las Vegas, Nevada 89145
Phone: 702.919.1919
Fax: 702.637.4357
Email: shawn@goldsteinlawltd.com
www.goldsteinlawltd.com

INVOICE

Invoice # 541
Date: 08/25/2021
Due On: 09/09/2021

Dr. Danka K Michaels
9517 Queen Charlotte Dr
Las Vegas, NV 89145

Pickens v. Michaels D-17-560737-D Post Divorce

Legal Services

Date	Attorney	Time	Rate	Discount	Total
09/04/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Emails to and from Abrams office re: [REDACTED] (NO CHARGE).					
09/09/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Emails to and from Abrams office and client. (NO CHARGE).					
09/13/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of emails with client and Abrams office. (NO CHARGE).					
09/17/2020	SMG	1.00	\$475.00	-	\$475.00
Zoom conference call with Abrams and client.					
09/18/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt of file from Abrams office; conference with JML re: [REDACTED] File corrupted, need to pick up another (NO CHARGE).					
09/24/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Conference with JML re: [REDACTED]; discussion of review, etc. (NO CHARGE).					
09/24/2020	SMG	0.30	\$475.00	-	\$142.50
Call with Abrams re: [REDACTED]					
09/25/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00

Conference with JML re: [REDACTED] (NO CHARGE).					
10/01/2020	SMG	2.50	\$475.00	-	\$1,187.50
Lengthy zoom conference call with Abrams and Stolz re: [REDACTED]					
10/02/2020	SMG	1.10	\$475.00	-	\$522.50
Lengthy zoom conference call with Abrams and Stolz re: [REDACTED]					
10/03/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails to and from client. (NO CHARGE).					
10/05/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails to and from client. (NO CHARGE).					
10/06/2020	SMG	0.30	\$450.00	-	\$135.00
Meeting with client.					
10/06/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails to and from client. (NO CHARGE).					
10/07/2020	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Emails to and from Abrams office re: [REDACTED] (NO CHARGE).					
10/08/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of email from Stolz re: [REDACTED] (NO CHARGE).					
10/08/2020	SMG	3.00	\$475.00	-	\$1,425.00
Work on trial preparation re: direct exam of client; reviewed notes and outline prepared by Abrams.					
10/14/2020	SMG	0.50	\$475.00	-	\$237.50
Work on trial preparation: reviewed timeline from Abrams; outlined notes re: same.					
10/15/2020	SMG	0.20	\$475.00	-	\$95.00
Prepared Notice of Association of Counsel.					
10/16/2020	SMG	2.50	\$475.00	-	\$1,187.50
Prepared for and attended Zoom conference call with Abrams and Stolz re: [REDACTED] [REDACTED] reviewed multiple other case related documents after Zoom call.					
10/18/2020	SMG	4.00	\$450.00	-	\$1,800.00
Trial preparation.					
10/19/2020	SMG	1.00	\$450.00	-	\$450.00
Call with John Jones re: case and trial continuance; agreed to continuance.					

10/19/2020	SMG	0.20	\$450.00	100.0% (-\$90.00)	\$0.00
Emails to and from Jones and Ileen to coordinate trial continuance. (NO CHARGE).					
10/19/2020	SMG	0.20	\$450.00	-	\$90.00
Emails to and from Avece re: [REDACTED]					
10/20/2020	SMG	1.00	\$450.00	-	\$450.00
Zoom call with Avece and Abrams re: [REDACTED]					
10/21/2020	SMG	0.50	\$450.00	-	\$225.00
Receipt and review of email with Amended Operating Agreement for Patience One, LLC sent by client. Began review of same and outlined questions.					
10/26/2020	SMG	0.20	\$450.00	100.0% (-\$90.00)	\$0.00
Receipt and review of Notice of Hearing filed by Clerk re: trial continuance. (NO CHARGE).					
11/09/2020	SMG	3.00	\$475.00	-	\$1,425.00
Receipt and review of email from Maupin with attached trial transcript from justice court regarding eviction; reviewed Tom's testimony and outlined issues for impeachment for this trial.					
11/11/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Emails to and from client. (NO CHARGE).					
11/12/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails from client. (NO CHARGE).					
11/13/2020	SMG	1.10	\$475.00	-	\$522.50
Call with Abrams re: [REDACTED]					
11/13/2020	SMG	2.00	\$475.00	-	\$950.00
Receipt of email from Maupin re: [REDACTED]					
11/14/2020	SMG	4.00	\$475.00	-	\$1,900.00
Additional trial preparation (3.5); emails to and from Maupin (.2); work on EDCR 7.27 Brief (.3).					
11/14/2020	SMG	9.00	\$475.00	-	\$4,275.00
Continued trial preparation.					
11/16/2020	SMG	10.00	\$475.00	-	\$4,750.00
Continued trial preparation; meeting with client to prepare for trial.					
11/17/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Work to continue trial (medical issue); Court was going to continue trial because of COVID anyway; multiple emails to and from Court and opposing counsel. Receipt and review of new trial date. Reviewed notice of hearing. (NO CHARGE).					

11/17/2020	SMG	0.20	\$475.00	-	\$95.00
Receipt and review of email from Maupin; responded to email.					
11/18/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Call with Abrams and Stolz re: [REDACTED] (NO CHARGE).					
11/23/2020	SMG	0.20	\$475.00	-	\$95.00
Call with Abrams re [REDACTED]					
11/24/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails to and from Abrams and the Court re: trial scheduling. (NO CHARGE).					
11/25/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Multiple emails to and from the Court and opposing counsel re: trial scheduling. (NO CHARGE).					
12/02/2020	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Reviewed and responded to email from Stolz. (NO CHARGE).					
12/28/2020	SMG	2.00	\$475.00	-	\$950.00
Receipt and review of email from Abrams re: [REDACTED]					
01/05/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of email from client. (NO CHARGE).					
01/08/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Reviewed and responded to email from client. (NO CHARGE).					
01/12/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Confirming that trial is going forward on 22nd; receipt and review of email from Ileen confirming the same. (NO CHARGE).					
01/13/2021	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Receipt and review of emails from client. (NO CHARGE).					
01/17/2021	SMG	6.00	\$450.00	-	\$2,700.00
Trial preparation.					
01/17/2021	SMG	3.00	\$450.00	-	\$1,350.00
Meeting with client for trial preparation; client had surgery and is unwell.					
01/18/2021	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Multiple emails to and from court and opposing counsel re: trial needs to be moved. (NO CHARGE).					
01/19/2021	SMG	0.30	\$475.00	-	\$142.50

Emailed opposing counsel re: need for civil counsel on the conference call with Judge Steel.

01/22/2021	SMG	0.30	\$475.00	-	\$142.50
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Attended status check hearing with Judge Steel; discussion of new trial dates, etc.

01/31/2021	SMG	0.20	\$475.00	-	\$95.00
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Receipt and review of email from client re: [REDACTED]

02/17/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
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Reviewed client's email from last week re: [REDACTED] conference with JML. (NO CHARGE).

02/23/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
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Call to Abrams office; emails to and from Abrams office. (NO CHARGE).

02/24/2021	SMG	0.20	\$475.00	-	\$95.00
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Reviewed client's email from re: [REDACTED]

02/28/2021	SMG	8.00	\$450.00	-	\$3,600.00
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Trial preparation; re-watched day 1 of trial and continued outlining of issues.

03/01/2021	SMG	8.00	\$450.00	-	\$3,600.00
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Continued trial preparation; re-watched day 2 of trial and continued outlining of issues; continued work on outlining questioning; conference with Abrams.

03/02/2021	SMG	4.00	\$450.00	-	\$1,800.00
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Continued trial preparation.

03/02/2021	SMG	6.00	\$450.00	-	\$2,700.00
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Meeting with Jennifer Abrams and Stephanie for continued trial preparation.

03/04/2021	SMG	6.00	\$450.00	-	\$2,700.00
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Meeting with client to review testimony and prepare for trial.

03/04/2021	SMG	6.00	\$450.00	-	\$2,700.00
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Continued trial preparation.

03/05/2021	SMG	10.00	\$450.00	-	\$4,500.00
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Traveled to and attended trial day 3; discussion with client after trial as I took her home; call with Abrams after trial to discuss strategy for continued trial next week.

03/10/2021	SMG	5.00	\$450.00	-	\$2,250.00
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Work with Abrams and Stolz on trial preparation.

03/10/2021	SMG	5.00	\$450.00	-	\$2,250.00
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Continued trial preparation.

03/11/2021	SMG	12.00	\$450.00	-	\$5,400.00
Continued trial preparation; review and analyzed exhibits and documents in preparation for Tom's cross examination.					
03/11/2021	SMG	2.00	\$450.00	-	\$900.00
Meeting with client to prepare for cross examination by John Jones.					
03/12/2021	SMG	9.00	\$450.00	-	\$4,050.00
Attended trial day 4. Conference with client after trial; call with Abrams after trial.					
03/25/2021	SMG	2.00	\$475.00	-	\$950.00
Conference with Abrams re: [REDACTED]					
03/26/2021	SMG	1.50	\$475.00	-	\$712.50
Work on trial preparation and issues re [REDACTED]					
03/27/2021	SMG	0.40	\$475.00	-	\$190.00
Receipt and review of multiple emails (9) from Abrams and client re: [REDACTED]					
03/30/2021	SMG	0.60	\$475.00	-	\$285.00
Call with Abrams.					
03/31/2021	SMG	2.00	\$475.00	-	\$950.00
Work on evidentiary issues with summary coming in; receipt and review of email from Stolz; reviewed notes and statement. Work on preparing direct examination outline for questioning of Mr. Carillo.					
04/01/2021	SMG	5.00	\$450.00	-	\$2,250.00
Continued trial preparation; work on trial examination of Carillo, etc.					
04/01/2021	SMG	3.00	\$450.00	-	\$1,350.00
Meeting with client and Abrams to prepare for tomorrow's trial.					
04/01/2021	SMG	3.00	\$475.00	-	\$1,425.00
Work on revisions and comments to ECDR 7.27 brief.					
04/02/2021	SMG	4.50	\$450.00	-	\$2,025.00
Continued trial preparation; reviewed outline for Mr. Carillo; Traveled to and attended trial Day 5. Meeting with client and Abrams after trial at Abrams office to discuss [REDACTED]					
04/02/2021	SMG	2.00	\$450.00	-	\$900.00
Continued work on revisions to EDCR 7.27 brief; sent to Jennifer for finalization and filing.					
04/06/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of Court Minutes from last day of trial. (NO CHARGE).					
04/06/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00

Receipt and review of multiple emails to and from the clerk and Stolz re: exhibits, Exhibit "O", etc. (NO CHARGE).					
04/09/2021	SMG	0.40	\$450.00	-	\$180.00
Call with Maupin.					
04/09/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of emails to and from LoBello and the clerk re: exhibits. (NO CHARGE).					
04/13/2021	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Receipt and review of multiple emails to and from Maupin and Stolz re: [REDACTED] (NO CHARGE).					
04/13/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Communicate with Jones re: stipulation to extend briefing deadline (yesterday); reviewed proposed stipulation and executed it. (NO CHARGE).					
04/19/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Communicate with Jones re: additional extension to file brief; reviewed and executed Stipulation and Order. (NO CHARGE)					
04/21/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Communicate with Jones re: another request for extension; receipt and review of Stip and Order and executed it. (NO CHARGE).					
04/23/2021	SMG	0.30	\$475.00	-	\$142.50
Receipt and review of three (3) separate Requests for Judicial Notice filed by Tom; outlined notes.					
04/28/2021	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Receipt and review of multiple emails to and from Abrams and client re: [REDACTED] (NO CHARGE).					
04/28/2021	SMG	2.00	\$475.00	-	\$950.00
Reviewed Tom's Closing Argument; outlined issues, comments, etc.					
04/29/2021	SMG	0.30	\$475.00	100.0% (-\$142.50)	\$0.00
Receipt and review of multiple emails to and from Abrams and client re: [REDACTED] (NO CHARGE).					
04/29/2021	SMG	1.00	\$475.00	-	\$475.00
Call with Abrams re [REDACTED]					
05/02/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Reviewed multiple emails to and from client and Abrams. (NO CHARGE).					
05/04/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of email from client. (NO CHARGE).					
05/11/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Prepared Stipulation and Order to extend briefing deadlines. (NO CHARGE).					

05/20/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Prepared stipulation and order to extend briefing deadlines. (NO CHARGE).					
05/25/2021	SMG	3.00	\$475.00	-	\$1,425.00
Review of draft Closing Argument prepared by Abrams; outlined revisions and comments.					
05/26/2021	SMG	2.20	\$475.00	-	\$1,045.00
Call with Jennifer re: [REDACTED]					
05/26/2021	SMG	8.00	\$475.00	-	\$3,800.00
Continued work on FFCL.					
05/26/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Receipt and review of multiple emails to and from Abrams and Ileen re: extension of deadline to file brief. (NO CHARGE).					
05/27/2021	SMG	3.00	\$475.00	-	\$1,425.00
Continued work on FFCL, Closing Argument, etc.					
05/28/2021	SMG	8.00	\$475.00	-	\$3,800.00
Continued work on FFCL and Closing Argument.					
05/28/2021	SMG	0.20	\$475.00	-	\$95.00
Receipt and review of letter from opposing counsel to court.					
06/08/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Reviewed and responded to email from Maupin. (NO CHARGE).					
06/10/2021	SMG	0.20	\$475.00	100.0% (-\$95.00)	\$0.00
Conference with opposing counsel re: need extension to file rebuttal brief; receipt and review of stipulation and order and executed the same. (NO CHARGE).					
06/16/2021	SMG	0.50	\$475.00	-	\$237.50
Receipt and review of Reply filed by Tom; conference with Abrams re: [REDACTED]					
08/05/2021	SMG	0.50	\$475.00	-	\$237.50
Receipt and review of decision from Court on case; reviewed FFCL; successful results for client; conference with Abrams; conference with client.					
08/05/2021	SMG	0.20	\$475.00	-	\$95.00
Prepared Notice of Entry of Order.					
08/24/2021	SMG	2.00	\$475.00	-	\$950.00
Legal research on Offers of Judgment; began preparation of Memo of Fees and Costs.					
08/25/2021	SMG	2.50	\$475.00	-	\$1,187.50

Continued work on Memo of Fees and Costs; redaction of billing statements; revised, finalized and submitted Memo for filing.

Time Subtotal	207.6
Line Item Discount Subtotal	-\$4,360.00
Legal Services Subtotal	\$91,442.50

Out-of-Pocket Expenses/Costs

Date	Amount	Total
08/05/2021	\$3.50	\$3.50

E-Filing Fee: E-Filing Fee - Notice of Entry of FFCL

Out-of-Pocket Expenses/Costs Subtotal **\$3.50**

Total Time **207.6**

Subtotal **\$91,446.00**

Total **\$91,446.00**

EXHIBIT “B”

DECLARATION OF JENIFER V. ABRAMS, ESQ.

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

Jenifer V. Abrams, Esq. declares and says as follows:

1. That I am a duly licensed attorney in the state of Nevada and the founder of The Abrams & Mayo Law Firm. I am counsel for the Defendant in the action entitled *Pickens vs. Michaels*, Case No. D-17-560737-D and I have personal knowledge as to the facts and circumstances set forth herein (except as to those facts that are stated upon information and belief and as to those facts, I believe them to be true) and I am competent to testify hereto. I submit this Declaration in support of Defendant Danka Michael's Memorandum of Fees and Costs.

2. I reviewed the instant Memorandum of Fees and Costs and have personal knowledge of the facts and information stated therein which I believe to be true and correct. The factual statements contained in the Memorandum are adopted and incorporated herein as though fully set forth in this Declaration.

3. I personally prepared the billing invoices for The Abrams & Mayo Law Firm which are attached to the instant Memorandum as Exhibit "B" and I know the same to be true and correct copies thereof.

4. I hereby declare under the penalty of perjury that the foregoing is true and correct and submit this Declaration pursuant to, and in accordance with, NRS 53.045.

Executed this 25th day of August, 2021.

/s/ Jenifer V. Abrams
JENIFER V. ABRAMS, ESQ.

GOLDSTEIN LAW LTD.
10161 W. PARK RUN DR., STE. 150
LAS VEGAS, NEVADA 89145
T: 702.919.1919 | F: 702.637.4357



The

ABRAMS & MAYO

Law Firm

Ms. Danka Michaels
9517 Queen Charlotte Drive
Las Vegas, Nevada 89145

Jennifer V. Abrams, Esq.

Vincent Mayo, Esq.

Brandon K. Leavitt, Esq.

6252 South Rainbow Blvd.

Suite 100

Las Vegas, Nevada 89118

Telephone (702) 222-4021

Facsimile (702) 248-9750

November 30, 2017

Statement # 27560

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/16/17	AT	[REDACTED] [REDACTED] Email to potential expert re: Conflict check and related matters	0.80
	PL	Open computer and physical file	0.40
11/17/17	AT	Telephone Conference to Opposing Counsel's office and email to Opposing Counsel re: Extension of time to file response to Complaint for Divorce; Conference w/ Paralegal Stolz re: same	0.20
11/20/17	PL	[REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.50
11/21/17	AT	Exchange emails with Client and Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED]; Conference w/ Attorney Abrams re: same; Email to possible expert/attorney re: Brief case information and request information for retaining their services	0.30
11/22/17	AT	Conference with Paralegal Stolz re: Information and instructions to Slovakian expert and timing considerations	0.30
	PL	Exchange emails with Slovakian attorney / expert re: Moving forward with retaining her services, questions we need answered and information and documentation for her report	0.30
11/26/17	AT	Review information from Expert and exchange communications with Paralegal Stolz on 11/24 and today re: case related matters	0.20

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November 30, 2017

Statement # 27560

Page # 2

	PL	Exchange emails w/ Slovakian attorney/expert on November 24th and today re: Request to expedite report and related matters; Conference w/ Attorney Abrams re: same	0.20
11/27/17	AT	Receive and review email from Client re: [REDACTED]; Receive and review documents from Expert re: Retainer Agreement; Execute Retainer Agreement and approve wire transfer	0.40
	PL	Exchange communications w/ Expert and bank to make payment arrangements/wire to expert; Conference w/ Attorney Abrams re: same and discuss case related matters; Draft Notice of Appearance of Attorney and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same	0.50
11/28/17	AT	Receive and review Expert Report and Conference w/ Paralegal Stolz re: same; Exchange communications with Client re: [REDACTED]	0.70
	PL	Review expert report and discuss same with Attorney Abrams; Exchange emails w/ Slovakian attorney/expert re: Discuss report and related matters, per Attorney Abrams' instructions; Begin working on Motion to Dismiss	1.20
11/29/17	AT	Telephone Conference to Robert Semonian re: Declaration; Memo to Staff re: Terms of Declaration and related matters; Left message for and telephone conference from Attorney Shannon Evans; Memo to Staff re: Terms of Declaration and related matters; Review, modify, and then approve Motion to Dismiss and Appendix; Legal research	3.60
	PL	Draft Declaration of Robert Semonian, per Attorney Abrams' instructions; Email to Robert Semonian re: Attached Declaration for review and signature; Receive email from Robert Semonian re: Attached signed Declaration; Begin draft of Declaration for Shannon Evans, Esq.; Work on Motion to Dismiss and pass to Attorney Abrams; Finalize Declaration of Shannon Evans, Esq., per Attorney Abrams' instructions; Email to Shannon Evans, Esq. re: same; Finalize Motion, per Attorney Abrams' instructions; Email to Client re: [REDACTED] Draft Appendix in Support of Motion; Exchange communications w/ Shannon Evans, Esq. re: Attached signed Declaration; Receive email from Client re: [REDACTED] Finalize Motion and Appendix for filing with the Court	2.50

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November 30, 2017

Statement # 27560

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Total of	6.40	AT	Attorney Abrams'	Hours @	\$500.00	=	\$3,200.00
Total of	5.90	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$1,032.50
					Total for Services		\$4,232.50

Case Costs

E-Filing Fee	\$3.50	
E-Filing Fee	\$3.50	
E-Filing Fee - Invoice Copy Attached	\$227.01	
	Total for Costs	\$234.01

Total Fees and Costs on This Statement **\$4,466.51**

Payments from Trust Account on This Statement **- \$4,466.51**

Unpaid Accounts Receivable Balance as of This Statement **\$0.00**

Your required minimum Trust Account Balance at this time is \$5,000.00

TOTAL BALANCE DUE NOW **\$0.00**

Recent Activity in Trust Account

Balance Forward

11/16/17	Payment by Credit Card on File - Thank You.	\$10,000.00	
11/30/17	Payment for invoice: 27560		\$4,466.51
	Your remaining Trust Account Balance is	\$5,533.49	

AA08039



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December 15, 2017

Statement # 27723

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/01/17	PL	Email to Client re: [REDACTED]	0.20
12/12/17	AT	Receive, review, and reply to email from Client re: [REDACTED]	0.20
	PL4	Prepare Petition to Seal Records, Order to Seal Records and Notice of Entry of Order for Attorney Abrams review and signature	0.60
12/13/17	AT	Conference w/ Paralegal Stolz re: case related matters; Email to Client re: [REDACTED] Receive, review, and reply to email from Opposing Counsel re: Extension of time	0.30
	PL	Conference w/ Attorney Abrams yesterday and today re: Case related matters; Email to Slovakian attorney / expert re: [REDACTED]	0.30

Total of 0.50 AT Attorney Abrams' Hours @ \$500.00 = \$250.00

Total of 0.50 PL Paralegal Stolz's Hours @ \$175.00 = \$87.50

Total of 0.60 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$105.00

Total for Services \$442.50

Case Costs

Fee for Daniela Jezova, LL.M.

\$739.97

E-Filing Fee

\$3.50

Total for Costs \$743.47

AA08040

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December 15, 2017

Statement # 27723

Page # 2

Total Fees and Costs on This Statement **\$1,185.97**

Payments from Trust Account on This Statement **- \$1,185.97**

Unpaid Accounts Receivable Balance as of This Statement **\$0.00**

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment **\$652.48**

TOTAL BALANCE DUE NOW **\$652.48**

Recent Activity in Trust Account

Balance Forward

\$5,533.49

12/15/17 Payment for invoice: 27723

\$1,185.97

Your remaining Trust Account Balance is

\$4,347.52

AA08041



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December 31, 2017

Statement # 27765

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/20/17	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Case status and case related matters; Receive, review, and reply to email from Client re: [REDACTED] Email to Slovakian Attorney re: [REDACTED]	0.20
12/21/17	AT	Receive and review documents from Opposing Counsel re: Opposition and Exhibits; Email to Client and Paralegal Stolz re: [REDACTED]	0.40
	PL	Email to Client re: [REDACTED]; Email to Opposing Counsel re: Request to continue hearing	0.20
12/26/17	AT	Review, modify, and then approve Stipulation and Order to Continue; Receive and review documents from Client re: [REDACTED] Conference w/ Paralegal Stolz re: Reply	1.40
	PL	Draft Stipulation and Order to Continue Hearing, for Attorney Abrams' review; Exchange emails w/ Opposing Counsel re: same; Instructions to Legal Secretary re: same; Exchange emails w/ Client on December 27th re: same (0.5 at no charge)	0.00
12/28/17	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Draft Notice of Entry of Stipulation and Order to Continue Hearing and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same	0.30

AA08042

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December 31, 2017

Statement # 27765

Page # 2

PL Research title companies that handled sale of the parties' 0.40
Nevada properties and their contact information; Conference
w/ Attorney Abrams re: same; Email to Client re: same

Total of 2.20 AT Attorney Abrams' Hours @ \$500.00 = \$1,100.00

Total of 1.10 PL Paralegal Stolz's Hours @ \$175.00 = \$192.50

Total for Services \$1,292.50

Case Costs

Courier Service \$15.00

E-Filing Fee \$3.50

E-Filing Fee \$3.50

Total for Costs \$22.00

Total Fees and Costs on This Statement \$1,314.50

Payments from Trust Account on This Statement - \$1,314.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,314.50

TOTAL BALANCE DUE NOW \$1,314.50

Recent Activity in Trust Account

Balance Forward

\$5,000.00

12/31/17 Payment for invoice: 27765

\$1,314.50

Your remaining Trust Account Balance is

\$3,685.50

AA08043



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January 31, 2018

Statement # 27976

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/17/18	PL	Begin draft / set up of Reply to Opposition to Defendant's Motion to Dismiss and Opposition to Countermotion for Attorney's Fees and Costs	0.40
01/18/18	AT	Review Opposition and Client's response to same; Review, modify, and then approve draft Reply; Conference w/ Paralegal Stolz re: same	1.80
	PL	Complete draft of Reply to Opposition to Motion to Dismiss and Opposition to Countermotion for Attorney's Fees and Costs, for Attorney Abrams' review; Conference w/ Attorney Abrams re: Discuss same, [REDACTED] Email to Client re: Attached Reply, for review and approval	2.70
01/19/18	AT	Receive and review comments to Reply from Client; Review, modify, and then approve revisions and insert additional argument and legal citation; Conference w/ Paralegal Stolz re: same	0.30
	PL	Receive email from Client re: [REDACTED] Conference w/ Attorney Abrams re: same; Make Client's requested changes, for Attorney Abrams' review; Email to Client re: Attached revised Reply; Finalize Reply and Exhibit thereto; Instructions to Legal Secretary re: E-file and serve same; Exchange emails w/ Client re: Discuss next week's hearing and related matters	0.70
01/24/18	PL	Prepare Client's file for tomorrow's hearing	0.20
01/25/18	AT	Prepare for and represent Client at Court Hearing; Matter taken under advisement; Conference w/ Paralegal Stolz re: same	1.60
	PL	Conference w/ Attorney Abrams re: Results from today's hearing and related matters	0.20

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January 31, 2018
Statement # 27976
Page # 2

01/29/18	PL	Obtain Court Minutes from January 25th hearing; Update Client's file accordingly; Conference w/ Attorney Abrams re: same	0.20
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Total of	3.70	AT	Attorney Abrams'	Hours @	\$500.00	=	\$1,850.00
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Total of	4.40	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$770.00
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Total for Services	\$2,620.00
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Case Costs

Courier Service	\$15.00
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E-Filing Fee	\$3.50
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Total for Costs	\$18.50
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Total Fees and Costs on This Statement	\$2,638.50
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Payments from Trust Account on This Statement	- \$2,638.50
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Unpaid Accounts Receivable Balance as of This Statement	\$0.00
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Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment	\$2,638.50
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<u>TOTAL BALANCE DUE NOW</u>	<u>\$2,638.50</u>
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Recent Activity in Trust Account

Balance Forward

\$5,000.00

01/31/18	Payment for invoice: 27976	\$2,638.50
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Your remaining Trust Account Balance is	\$2,361.50
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AA08045



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March 15, 2018

Statement # 28280

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/05/18	PL	Review case via Court's website for status update on the Decision - Nothing yet; Email to Client re: same and Conference w/ Attorney Abrams re: same	0.20
03/07/18	AT	Conferences with Paralegal Stolz re: case related matters on 3/5 and today	0.20
	PL	Review case via Court's website for status update on the Decision - Nothing yet; Email to Client re: same and Conference w/ Attorney Abrams re: same; Telephone Conference to Court re: Request status of Judge's Decision - Judge is still working on same; Email to Client re: same and Conference w/ Attorney Abrams re: same	0.20
03/12/18	AT	Receive and review Decision; Email to Client re: same	0.20
	PL	Obtain a file-stamped of the Court's Order via Court's website; Email to Client re: same and Conference w/ Attorney Abrams re: same	0.20
03/14/18	AT	Receive and review documents from Court re: Decision; Receive, review, and reply to email from Client re: [REDACTED]	0.50
	PL	Conferences w/ Attorney Abrams on March 12th and today re: Discuss Decision and next steps; Left message for Court on March 12th re: Request information as to whether or not the Court plans on setting an Evidentiary Hearing; Follow up telephone conference to the Court today re: Request information as to whether or not the Court plans on setting an Evidentiary Hearing - The Court does not plan on setting same; Conference w/ Attorney Abrams re: same	0.30
Total of	0.90	AT Attorney Abrams'	Hours @ \$500.00 = \$450.00
Total of	0.90	PL Paralegal Stolz's	Hours @ \$175.00 = \$157.50

AA08046

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March 15, 2018
Statement # 28280
Page # 2

	Total for Services	\$607.50
Total Fees and Costs on This Statement		\$607.50
Payments from Trust Account on This Statement	-	\$607.50
Unpaid Accounts Receivable Balance as of This Statement		\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00		
Therefore, please include the following amount in your next payment		\$607.50
	<u>TOTAL BALANCE DUE NOW</u>	<u>\$607.50</u>

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
03/15/18 Payment for invoice: 28280		\$607.50
Your remaining Trust Account Balance is	\$4,392.50	

AA08047



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March 31, 2018

Statement # 28420

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/16/18	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters	0.20
03/22/18	PL	Receive and review Opposing Party's Amended Complaint and calculate and calendar Answer deadline; Begin working on Answer to Amended Complaint and Counterclaim	2.10
03/26/18	AT	Receive voice mail from Client re: [REDACTED] [REDACTED] Search public records, locate deed as "a single man," and Email to Client re: same	0.30

Total of 0.50 AT Attorney Abrams' Hours @ \$500.00 = \$250.00

Total of 2.30 PL Paralegal Stolz's Hours @ \$175.00 = \$402.50

Total for Services \$652.50

Total Fees and Costs on This Statement \$652.50

Payments from Trust Account on This Statement - \$652.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$652.50

TOTAL BALANCE DUE NOW \$652.50

AA08048

March 31, 2018
Statement # 28420
Page # 2

Recent Activity in Trust Account

Balance Forward

\$5,000.00

03/31/18 Payment for invoice: 28420

\$652.50

Your remaining Trust Account Balance is

\$4,347.50



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April 15, 2018

Statement # 28532

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
04/03/18	AT	[REDACTED]	0.20
04/11/18	PL	Complete draft of Answer to Amended Complaint and Counterclaim, for Attorney Abrams' review	1.10
Total of	0.20 AT	Attorney Abrams'	Hours @ \$500.00 = \$100.00
Total of	1.10 PL	Paralegal Stolz's	Hours @ \$175.00 = \$192.50
Total for Services			\$292.50
Total Fees and Costs on This Statement			\$292.50
Payments from Trust Account on This Statement			- \$292.50
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00			
Therefore, please include the following amount in your next payment			\$292.50
<u>TOTAL BALANCE DUE NOW</u>			<u>\$292.50</u>

Recent Activity in Trust Account

Balance Forward

04/15/18 Payment for invoice: 28532

\$5,000.00

\$292.50

Your remaining Trust Account Balance is

\$4,707.50

AA08050



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April 30, 2018

Statement # 28635

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
04/19/18	AT	Review, modify, and then approve Answer and Counterclaim; Conference w/ Paralegal Stolz re: same	1.80
	PL	Email to Client re: Attached Answer and Counterclaim, for review and approval; Exchange emails w/ Client over the next few days re: [REDACTED]; Exchange communications w/ Opposing Counsel re: Status; Conference w/ Attorney Abrams re: same	0.30

Total of	1.80	AT	Attorney Abrams'	Hours @	\$500.00	=	\$900.00
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Total of	0.30	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$52.50
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Total for Services \$952.50

Total Fees and Costs on This Statement \$952.50

Payments from Trust Account on This Statement - \$952.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$952.50

TOTAL BALANCE DUE NOW \$952.50

Recent Activity in Trust Account

Balance Forward

AA08051

April 30, 2018
Statement # 28635
Page # 2

\$5,000.00

04/30/18 Payment for invoice: 28635

\$952.50

Your remaining Trust Account Balance is

\$4,047.50



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May 15, 2018

Statement # 28701

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
05/02/18	AT	Meeting with Client re: [REDACTED]	1.10
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Meeting with Client re: Client reviewed, approved, and signed Answer and Counterclaim and I notarized same	0.20
05/08/18	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters; Email to Opposing Counsel re: Request to coordinate 16.2 Early Case Conference, per Attorney Abrams' instructions; Receive, review, and reply to email from Opposing Counsel on May 9th re: Will get back to me regarding 16.2 Early Case Conference	0.20
05/15/18	PL	Exchange emails w/ Opposing Counsel's office and Client re: Availability and coordinating 16.2 Early Case Conference	0.20

Total of 1.10 AT Attorney Abrams' Hours @ \$500.00 = \$550.00

Total of 0.60 PL Paralegal Stolz's Hours @ \$175.00 = \$105.00

Total for Services \$655.00

Case Costs

E-Filing Fee

\$3.50

Total for Costs \$3.50

Total Fees and Costs on This Statement \$658.50

Payments from Trust Account on This Statement - \$658.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

AA08053

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May 15, 2018
Statement # 28701
Page # 2

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$658.50

TOTAL BALANCE DUE NOW \$658.50

Recent Activity in Trust Account

Balance Forward

\$5,000.00

05/15/18 Payment for invoice: 28701

\$658.50

Your remaining Trust Account Balance is

\$4,341.50



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May 31, 2018

Statement # 28805

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
05/18/18	PL	Exchange emails w/ Opposing Counsel re: Coordinate Early Case Conference; Email to Client re: same and Conference w/ Attorney Abrams re: same	16.2 0.20
05/24/18	AT	Conferences with Paralegal Stolz on 5/18 and today re: case related matters	0.20
	PL	Receive, review, and reply to email from Opposing Counsel re: Grant extension for Reply to Counterclaim; Conference w/ Attorney Abrams re: same	0.20
05/31/18	AT	Telephone Conference to Client in preparation for tomorrow's 16.2 Early Case Conference	0.30
	PL	Exchange emails w/ Client yesterday and today re: [REDACTED] Conference w/ Attorney Abrams re: same; Instructions to Paralegal J. Schoen re: Initial disclosures	0.20
	PL4	Prepare 1st set of 16.2 Disclosures and Witnesses for Attorney Abrams review and approval; E-mail Mr. Semonian to request his address for same; Bates stamp documents for same	0.60

Total of 0.50 AT Attorney Abrams' Hours @ \$500.00 = \$250.00

Total of 0.60 PL Paralegal Stolz's Hours @ \$175.00 = \$105.00

Total of 0.60 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$105.00

Total for Services \$460.00

Total Fees and Costs on This Statement \$460.00

Payments from Trust Account on This Statement - \$460.00

AA08055

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May 31, 2018

Statement # 28805

Page # 2

Unpaid Accounts Receivable Balance as of This Statement **\$0.00**

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment **\$460.00**

TOTAL BALANCE DUE NOW **\$460.00**

Recent Activity in Trust Account

Balance Forward

\$5,000.00

05/31/18 Payment for invoice: 28805

\$460.00

Your remaining Trust Account Balance is

\$4,540.00

AA08056



The

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June 15, 2018

Statement # 28933

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
06/01/18	AT	Prepare for and represent Client at 16.2 Early Case Conference; Instructions to Paralegal Stolz and telephone conference from Client re: [REDACTED]	2.10
	PL	Assist Attorney Abrams with preparation for today's 16.2 Early Case Conference; Conference w/ Attorney Abrams following today's 16.2 Early Case Conference re: Discuss same and next steps in case	0.50

Total of 2.10 AT Attorney Abrams' Hours @ \$500.00 = \$1,050.00

Total of 0.50 PL Paralegal Stolz's Hours @ \$175.00 = \$87.50

Total for Services \$1,137.50

Total Fees and Costs on This Statement \$1,137.50

Payments from Trust Account on This Statement - \$1,137.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,137.50

TOTAL BALANCE DUE NOW \$1,137.50

Recent Activity in Trust Account

Balance Forward

AA08057

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June 15, 2018
Statement # 28933
Page # 2

\$5,000.00

06/15/18 Payment for invoice: 28933

\$1,137.50

Your remaining Trust Account Balance is

\$3,862.50



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July 31, 2018

Statement # 29258

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
07/17/18	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conferences w/ Attorney Abrams yesterday and today re: Case related matters	0.20
07/19/18	PL	Receive voice mail from and telephone conference to Opposing Counsel's office re: Confirm Subpoenas are for records only	0.20
07/20/18	AT	Conference w/ Paralegal Stolz re: Expert Witness list and other case related matters	0.20
	PL	Receive and review Opposing Party's Expert Witness List and research expert; Conference w/ Attorney Abrams re: same	0.20
07/23/18	AT	Receive and review correspondence from Opposing Counsel re: Settlement offer; [REDACTED]; Email to Opposing Counsel re: Status of providing expert report	0.30
	PL	Conference w/ Attorney Abrams re: Discuss case related matters	0.20
07/24/18	AT	Receive, review, and reply to email from Opposing Counsel re: No expert report; Conference w/ Paralegal Stolz re: same	0.20
07/31/18	AT	Telephone Conference from Opposing Counsel re: Settlement discussions vs. discovery; Telephone Conference to Client re: [REDACTED] Review, modify, and then approve Subpoena Duces Tecum to Accountant; Review, modify, and then approve Subpoena Duces Tecum to Estate Planning Attorney; Review, modify, and then approve 2nd Set of 16.2 Disclosures; Skim transcript from testimony of Opposing Party	2.30
	PL	Research registered agents for Shannon Evans, Esq. and Robert Semonian, CPA and draft Subpoena Duces Tecums,	1.30

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Statement # 29258
Page # 2

for Attorney Abrams' review; Instructions to Legal Secretary
re: same; Conference w/ Attorney Abrams re: Discuss case
related matters; Email to Client re: [REDACTED]

[REDACTED] Telephone
Conference to Court re: Request for the Court to set the Case
Management Conference, per Attorney Abrams' instructions;
Conference w/ Attorney Abrams re: same

PL4 Add Transcript to the 2nd Set of 16.2 Disclosures per 0.20
Attorney Abrams instructions; Bates stamp same; Instructions
to Legal Secretary re: Same

Total of 3.20 AT Attorney Abrams' Hours @ \$500.00 = \$1,600.00

Total of 2.10 PL Paralegal Stolz's Hours @ \$175.00 = \$367.50

Total of 0.20 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$35.00

Total for Services \$2,002.50

Case Costs

Special Process Service - Invoice Copy \$80.00
Attached

E-Filing Fee \$3.50

Total for Costs \$83.50

Total Fees and Costs on This Statement \$2,086.00

Payments from Trust Account on This Statement - \$2,086.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$2,086.00

TOTAL BALANCE DUE NOW \$2,086.00

July 31, 2018

Statement # 29258

Page # 3

Recent Activity in Trust Account

Balance Forward

\$5,000.00

07/31/18 Payment for invoice: 29258

\$2,086.00

Your remaining Trust Account Balance is

\$2,914.00



The

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August 15, 2018

Statement # 29370

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/01/18	AT	[REDACTED]	0.20
	PL	Email to Client re: Attached Order Setting Case Management Conference and information / guidelines for conference	0.20
08/03/18	AT	Receive and review email from Opposing Counsel's office re: Responses from Subpoena Duces Tecum; Conference w/ Paralegal Stolz re: same; Conference w/ Paralegal Stolz re: discovery issues	0.30
	PL	Conference w/ Attorney Abrams re: Discuss case related matters	0.20
	PL4	Prepare Authorization for Robert Semonian and Letter to Opposing Counsel for Attorney Abrams review and approval	0.40
08/06/18	AT	Review, modify, and then approve Authorization to Release Records and letter to Opposing Counsel; Conference with Paralegal J. Schoen re: same	0.20
	PL4	Finalize Letter and Stipulation and Order per Attorney Abrams instructions; Instructions to Legal Secretary re: Same	0.20
08/07/18	PL4	Begin reviewing transcript from eviction proceedings and make notes pursuant to Attorney Abrams request	1.80
08/08/18	PL4	Continue reviewing transcript from eviction proceedings and make notes pursuant to Attorney Abrams request	0.80
08/14/18	PL	Exchange emails w/ Opposing Counsel re: Request and receive status of Opposing Party completing and returning Authorization for the Release of Records and discuss status of documents in response to Subpoena and related matters; Telephone Conference from Shannon Evans' office re; Status of responding to Subpoena Duces Tecum; Conference w/ Attorney Abrams re: same	0.30

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August 15, 2018
Statement # 29370
Page # 2

08/15/18 PL4 Send Authorization to Mr. Semonian 0.20

Total of 0.70 AT Attorney Abrams' Hours @ \$500.00 = \$350.00

Total of 0.70 PL Paralegal Stolz's Hours @ \$175.00 = \$122.50

Total of 3.40 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$595.00

Total for Services \$1,067.50

Case Costs

Special Process Service - Invoice Copy \$40.00
Attached

Special Process Service - Invoice Copy \$40.00
Attached

E-Filing Fee \$3.50

Total for Costs \$83.50

Total Fees and Costs on This Statement \$1,151.00

Payments from Trust Account on This Statement - \$1,151.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,151.00

TOTAL BALANCE DUE NOW \$1,151.00

Recent Activity in Trust Account

Balance Forward

\$5,000.00

08/15/18 Payment for invoice: 29370

\$1,151.00

Your remaining Trust Account Balance is

\$3,849.00

AA08063



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August 31, 2018

Statement # 29475

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/21/18	PL4	Finish reviewing a taking notes on Eviction transcript	2.30
08/22/18	PL4	Prepare the 3rd set of 16.2 Disclosures for Attorney Abrams review and approval; Review each page to redact Social Security Numbers; Bates stamp same; Locate contact information; Attempt to call then send e-mail to Ticor Title re: Past due Subpoena responses	1.60
08/23/18	PL4	Review documents and frame out Requests for Production of Documents and Interrogatories; E-mail to Attorney Abrams re: Same	0.80
08/24/18	AT	Receive and review documents from Shannon Evans; Instructions to Staff re: Authorization for release of records on privilege log; Review, modify, and then approve Third Set of 16.2 Disclosures	0.50
08/27/18	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
08/28/18	AT	Conferences with Staff yesterday and today re: case related matters	0.20
	PL	Conference w/ Attorney Abrams and Paralegal J. Schoen re: Discuss discovery and other case related matters; [REDACTED] [REDACTED]	0.60
	PL4	Conference with Attorney Abrams re: Requests for Production of Documents; Review notes for Requests for Production of Documents	1.60
08/30/18	AT	Review, modify, and then approve Authorization; Conference with Paralegal J. Schoen re: same	0.20

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Law Firm

August 31, 2018
Statement # 29475
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	PL4	Prepare Authorization for Shannon L. Evans, Ltd. For Attorney Abrams review and approval; Finalize 3rd set of 16.2 Disclosures; Instructions to Legal Secretary re: Same; Send Authorization to Opposing Counsel with instructions	0.40
08/31/18	PL4	E-mail Mr. Semonian re: Status of records	0.20
Total of	0.90	AT Attorney Abrams' Hours @ \$500.00 = \$450.00	
Total of	0.80	PL Paralegal Stolz's Hours @ \$175.00 = \$140.00	
Total of	6.90	PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$1,207.50	
		Total for Services	\$1,797.50
Total Fees and Costs on This Statement			\$1,797.50
Payments from Trust Account on This Statement			- \$1,797.50
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00			
Therefore, please include the following amount in your next payment			\$2,948.50
<u>TOTAL BALANCE DUE NOW</u>			<u>\$2,948.50</u>

Recent Activity in Trust Account		Balance Forward
		\$3,849.00
08/31/18	Payment for invoice: 29475	\$1,797.50
Your remaining Trust Account Balance is		\$2,051.50



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September 15, 2018

Statement # 29529

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/05/18	PL4	Follow up with Mr. Semonian re: Status of documents	0.20
09/06/18	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Receive, review, and reply to email from Client re: [REDACTED]	0.20
		[REDACTED] Conference w/ Attorney Abrams re: same	
	PL4	Exchange multiple e-mails with Opposing Counsel re: Telephone Conference; Calendar same	0.20
09/07/18	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Review and discuss with Attorney Abrams the records produced by Ticor Title of Nevada in response to the Subpoena and other case related matters; Prepare Client's file for Monday's hearing	0.50
09/10/18	AT	Prepare for and represent Client at Case Management Conference; Meet with Client re: [REDACTED] Review Motion filed by Opposing Counsel; Email to Client and Conference w/ Paralegal Stolz re: same	2.30
	PL	Conference w/ Attorney Abrams re: Discuss the records being provided by Robert Semonian and related matters; Conference w/ Attorney Abrams re: Discuss results from today's Case Management Conference, receive instructions to prepare Order After Hearing, discuss the Motion filed by Opposing Party and other related matters	0.30
09/11/18	AT	Conferences with Staff re: case related matters	0.20
	PL	Calendar all dates and deadlines in the Case and Trial Management Order; Conference w/ Attorney Abrams re: same; Exchange emails w/ Client re: same; Conference with Paralegal J. Schoen re: Disclosures	0.50

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September 15, 2018

Statement # 29529

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	PL4	Receive signed Authorization for Shannon Evans from Opposing Counsel; Save same; E-mail and fax same to Ms. Evans	0.20
09/12/18	PL4	Save documents and begin 4th Set of 16.2 Disclosures; Waiting on documents from Mr. Semonian and Ms. Evans to finalize; Check through over 300 pages to make sure no additional redactions are needed	0.50

Total of 2.90 AT Attorney Abrams' Hours @ \$500.00 = \$1,450.00

Total of 1.50 PL Paralegal Stolz's Hours @ \$175.00 = \$262.50

Total of 1.10 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$192.50

Total for Services \$1,905.00

Total Fees and Costs on This Statement \$1,905.00

Payments from Trust Account on This Statement - \$1,905.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,905.00

TOTAL BALANCE DUE NOW \$1,905.00

Recent Activity in Trust Account

Balance Forward

\$5,000.00

09/15/18 Payment for invoice: 29529

\$1,905.00

Your remaining Trust Account Balance is

\$3,095.00

AA08067



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September 30, 2018

Statement # 29606

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/17/18	AT	Receive and review email from Client re: [REDACTED] [REDACTED] Email to Opposing Counsel re: Send stipulation	0.20
09/18/18	PL	Conference w/ Paralegal J. Schoen re: Case related matters; Obtain Court Minutes from September 10th hearing; Update Client's file accordingly; Conference w/ Attorney Abrams re: same	0.30
	PL4	E-mail Evans and Associates re: Missing documents; Follow up with Ms. Evans re: Status of documents	0.20
09/19/18	PL4	Receive missing documents from Evans & Associates; Save same and e-mail same to Client	0.20
09/20/18	PL4	Finish Requests for Production of documents according to e-mail received from Attorney Abrams; Send Same to Attorney Abrams for review and edit	0.60
09/26/18	AT	Review and approve proposed Stipulation and Order re: Second Amended Complaint; Conference w/ Paralegal Stolz re: same	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Email to Opposing Counsel re: Attached Stipulation and Order, which was signed by Attorney Abrams; Email to Client re: same	0.20
09/28/18	AT	Begin review and modification of Request for Production of Documents; Instructions to Paralegal J. Schoen re: same	0.40
Total of	0.80 AT	Attorney Abrams'	Hours @ \$500.00 = \$400.00
Total of	0.50 PL	Paralegal Stolz's	Hours @ \$175.00 = \$87.50
Total of	1.00 PL4	Paralegal J. Schoen's	Hours @ \$175.00 = \$175.00

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September 30, 2018

Statement # 29606

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Total for Services \$662.50

Total Fees and Costs on This Statement \$662.50

Payments from Trust Account on This Statement - \$662.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$662.50

TOTAL BALANCE DUE NOW \$662.50

Recent Activity in Trust Account

Balance Forward

\$5,000.00

09/30/18 Payment for invoice: 29606

\$662.50

Your remaining Trust Account Balance is

\$4,337.50

AA08069



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October 15, 2018

Statement # 29677

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
10/05/18	PL	Obtain confirmation that the hearing on Opposing Party's Motion to Amend was canceled; Email to Client re: same and Conference w/ Attorney Abrams re: same; Update calendar accordingly	0.20
	PL4	Prepare Order After Hearing for Attorney Abrams review and approval; Review notes and minutes for same; E-mail same to Attorney Abrams for review	0.50
10/09/18	PL4	Amend Requests for productions of documents to add requests for Attorney Abrams review and approval	0.60
10/10/18	AT	Receive, review, and reply to email from Client re: [REDACTED]	0.20
	PL4	Prepare 4th set of 16.2 Disclosures for Attorney Abrams review and approval; Combine, format, redact and bates stamp 2,123 documents for same; Exchange multiple e-mails with Mr. Semonian re: Multiple password protected documents; Enter multiple passwords for over 20 password protected documents in order to open, redact and bates stamp them	4.80
10/13/18	AT	Review, modify, and then approve Order After Hearing; Memo to Staff re: same	0.20
10/15/18	PL4	Send Order After Hearing to Opposing Counsel with ten-day e-mail	0.20

Total of 0.40 AT Attorney Abrams' Hours @ \$500.00 = \$200.00

Total of 0.20 PL Paralegal Stolz's Hours @ \$175.00 = \$35.00

Total of 6.10 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$1,067.50

Total for Services \$1,302.50

AA08070

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October 15, 2018
Statement # 29677
Page # 2

Total Fees and Costs on This Statement	\$1,302.50
Payments from Trust Account on This Statement	- \$1,302.50
Unpaid Accounts Receivable Balance as of This Statement	\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00	
Therefore, please include the following amount in your next payment	\$1,302.50
<u>TOTAL BALANCE DUE NOW</u>	<u>\$1,302.50</u>

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
10/15/18 Payment for invoice: 29677		\$1,302.50
Your remaining Trust Account Balance is	\$3,697.50	

AA08071



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November 15, 2018
Statement # 29874
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/01/18	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters; Email to Client re: same	0.20
11/06/18	AT	Review Opposing Counsel's proposed changes to Order After Hearing; Instructions to Paralegal J. Schoen re: same; Review, modify, and then approve Request for Production of Documents; Conference with Paralegal J. Schoen re: same	0.40
11/07/18	PL4	[REDACTED]	0.20
11/09/18	PL4	Review hearing video for cite regarding Attorney's Fees; Transcribe and send same to Attorney Abrams	0.50
11/12/18	PL	Review Opposing Party's Second Amended Complaint and draft Answer to Second Amended Complaint for Equitable Relief Under (1) The Putative Spouse Doctrine, and (2) Pursuant to Express and/or Implied Agreement to Hold Property as if the Parties Were Married Under Michoff; And to Set Aside Deeds of Real Property and Assignment of L.L.C. Interest; Affirmative Defenses and Counterclaim, for Attorney Abrams' review	1.20
11/14/18	AT	Review, modify, and then approve Answer to Second Amended Complaint; Conference w/ Paralegal Stolz re: same	0.40
11/15/18	PL	Finalize Answer to Second Amended Complaint; Email to Client re: same	0.20
Total of	1.00 AT	Attorney Abrams'	Hours @ \$500.00 = \$500.00
Total of	1.60 PL	Paralegal Stolz's	Hours @ \$175.00 = \$280.00

AA08072

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November 15, 2018

Statement # 29874

Page # 2

Total of 0.70 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$122.50

Total for Services \$902.50

Total Fees and Costs on This Statement \$902.50

Payments from Trust Account on This Statement - \$902.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$902.50

TOTAL BALANCE DUE NOW \$902.50

Recent Activity in Trust Account

Balance Forward

\$5,000.00

11/15/18 Payment for invoice: 29874

\$902.50

Your remaining Trust Account Balance is

\$4,097.50

AA08073



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November 30, 2018
Statement # 29916
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/16/18	PL	Exchange emails w/ Client and Conference w/ Attorney Abrams re: [REDACTED]	0.20
11/18/18	AT	Conferences with Paralegal Stolz on 11/16 and today re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Email to Client re: [REDACTED]	0.20
11/21/18	PL	Prepare cover page for Client's Declaration to the Answer to the Second Amended Complaint and Certificate of Service; Instructions to Legal Secretary re: same	0.20
11/29/18	PL	Exchange emails w/ Opposing Counsel's office re: Opposing Counsel's office requested and I resent Client's Declaration (0.2 at no charge)	0.00
11/30/18	PL4	Send Opposing Counsel the Order after Hearing with Attorney Abrams signature; Save same to file	0.20

Total of 0.20 AT Attorney Abrams' Hours @ \$500.00 = \$100.00

Total of 0.60 PL Paralegal Stolz's Hours @ \$175.00 = \$105.00

Total of 0.20 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$35.00

Total for Services \$240.00

Case Costs

E-Filing Fee	\$3.50
E-Filing Fee	\$3.50

AA08074

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November 30, 2018

Statement # 29916

Page # 2

Total for Costs **\$7.00**

Total Fees and Costs on This Statement **\$247.00**

Payments from Trust Account on This Statement **- \$247.00**

Unpaid Accounts Receivable Balance as of This Statement **\$0.00**

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment **\$247.00**

TOTAL BALANCE DUE NOW **\$247.00**

Recent Activity in Trust Account

Balance Forward

\$5,000.00

11/30/18 Payment for invoice: 29916

\$247.00

Your remaining Trust Account Balance is

\$4,753.00

AA08075



The

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December 31, 2018

Statement # 30054

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/19/18	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conferences w/ Attorney Abrams today and on December 24th re: same	0.30
12/24/18	AT	Receive and review email from and telephone conference to Client re: [REDACTED]	0.20
	PL3	Receive Responses to First Request for Production of Documents with damaged disk; Multiple telephone conferences with Opposing Counsel to resolve same; Conference w/ Attorney Abrams re: same	0.40

Total of 0.20 AT Attorney Abrams' Hours @ \$500.00 = \$100.00

Total of 0.30 PL Paralegal Stolz's Hours @ \$175.00 = \$52.50

Total of 0.40 PL3 Paralegal D. Schoen's Hours @ \$175.00 = \$70.00

Total for Services \$222.50

Total Fees and Costs on This Statement \$222.50

Payments from Trust Account on This Statement - \$222.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$222.50

TOTAL BALANCE DUE NOW \$222.50

AA08076

December 31, 2018

Statement # 30054

Page # 2

Recent Activity in Trust Account

Balance Forward

\$5,000.00

12/31/18 Payment for invoice: 30054

\$222.50

Your remaining Trust Account Balance is

\$4,777.50



The

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January 15, 2019

Statement # 30129

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/03/19	PL	Conference with Paralegal J. Schoen and Attorney Abrams re: Review of Opposing Party's discovery responses	0.20
	PL4	Review documents in response to discovery request; Summarize same for Attorney Abrams and Paralegal Stolz; [REDACTED]	2.60
01/10/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Email to Client re: Attached Discovery Requests and instructions for responding to same; Calculate and calendar response deadline; Receive, review, and reply to email from Client re: [REDACTED] Conference w/ Attorney Abrams re: Discuss case related matters	0.30
	PL4	Frame out Requests for Production of Documents for Attorney Abrams review and approval	0.70

Total of 0.20 AT Attorney Abrams' Hours @ \$500.00 = \$100.00

Total of 0.50 PL Paralegal Stolz's Hours @ \$175.00 = \$87.50

Total of 3.30 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$577.50

Total for Services \$765.00

Total Fees and Costs on This Statement \$765.00

Payments from Trust Account on This Statement - \$765.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

AA08078

The
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January 15, 2019
Statement # 30129
Page # 2

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$765.00

TOTAL BALANCE DUE NOW \$765.00

Recent Activity in Trust Account

Balance Forward

\$5,000.00

01/15/19 Payment for invoice: 30129

\$765.00

Your remaining Trust Account Balance is

\$4,235.00



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January 31, 2019
Statement # 30205
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/23/19	AT	Review summary of discovery responses prepared by Paralegal J. Schoen and skim through documents; Extensive meeting with Paralegal J. Schoen re: Deficiency letter, [REDACTED]	1.10
	AT	Review, modify, and then approve correspondence to Opposing Counsel re: Discovery deficiencies; Conference with Paralegal J. Schoen re: same	0.20
	PL	Conference w/ Attorney Abrams and Paralegal J. Schoen re: Next steps and other case related matters; Conferences w/ Paralegal J. Schoen today and on January 24th re: Case related matters	0.30
	PL4	Meeting with Attorney Abrams and Paralegal Stolz re: Case related matters; [REDACTED] [REDACTED] Prepare detailed deficiency letter for Attorney Abrams review and approval	1.80
01/24/19	PL4	Review documents received from Shannon Evans and Semonian Group; [REDACTED] [REDACTED] E-mail same to Attorney Abrams and Paralegal Stolz; Prepare responses to Requests for Production of Documents; [REDACTED]	2.60
Total of	1.30 AT	Attorney Abrams'	Hours @ \$500.00 = \$650.00
Total of	0.30 PL	Paralegal Stolz's	Hours @ \$175.00 = \$52.50

AA08080

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January 31, 2019
Statement # 30205
Page # 2

Total of 4.40 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$770.00

Total for Services \$1,472.50

Total Fees and Costs on This Statement \$1,472.50

Payments from Trust Account on This Statement - \$1,472.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,472.50

TOTAL BALANCE DUE NOW \$1,472.50

Recent Activity in Trust Account

Balance Forward

\$5,000.00

01/31/19 Payment for invoice: 30205

\$1,472.50

Your remaining Trust Account Balance is

\$3,527.50



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February 15, 2019
Statement # 30284
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
02/05/19	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: Discovery and other case related matters; Obtain a file-stamped copy of Opposing Counsel's Order Granting Withdrawal via Court's website; Email to Client re: same and Conference w/ Attorney Abrams re: same; Instructions to Legal Secretary re: Update Client's file	0.40
	PL4	Bates stamp title and finalize Responses to Requests for Production of Documents for Attorney Abrams review and approval	0.30
02/07/19	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters; Email to Client re: [REDACTED] [REDACTED]	0.30
02/08/19	AT	Review, modify, and then approve Responses to Request for Production of Documents; Conference with Paralegal J. Schoen re: case related matters	0.40
	PL4	Send Responses to Requests for Production of Documents to Client for review, approval and signature; [REDACTED] [REDACTED] Amend service information to Plaintiff in Pro Per since Opposing Counsel withdrew this week; Receive approval from Client; Instructions to Legal Secretary re: Same	0.30
02/12/19	PL	Email to Opposing Party setting EDCR 5.602 telephone conference to discuss the deficiencies in Opposing Party's Discovery Responses; Conference w/ Attorney Abrams re: same	0.20
02/13/19	PL	Draft Notice of Taking Videotaped Deposition of Opposing Party and Certificate of Service, for Attorney Abrams' review	0.30

AA08082

February 15, 2019
Statement # 30284
Page # 2

	PL4	Follow up with Client re: [REDACTED] [REDACTED]	0.20						
02/14/19	AT	Conference with Staff re: Discovery issues	0.20						
	AT	Conference w/ Paralegal Stolz re: case related matters	0.20						
	PL	Conference w/ Attorney Abrams re: Opposing Party's failure to participate in today's discovery conference and next steps	0.20						
02/15/19	PL	Finalize the Notice of Taking Videotaped Deposition of Opposing Party; Instructions to Legal Secretary re: same; Email to Court Reporter re: same; Exchange emails w/ Client re: same	0.20						
	PL4	Prepare Supplemental Declaration in Support of Responses to Requests for Production of Documents; Instructions to Legal Secretary re: Same	0.20						
Total of	0.80	AT Attorney Abrams'	Hours @	\$500.00	=	\$400.00			
Total of	1.60	PL Paralegal Stolz's	Hours @	\$175.00	=	\$280.00			
Total of	1.00	PL4 Paralegal J. Schoen's	Hours @	\$175.00	=	\$175.00			
							Total for Services		\$855.00
Case Costs									
		E-Filing Fee		\$3.50					
		E-Filing Fee		\$3.50					
							Total for Costs		\$7.00
Total Fees and Costs on This Statement									\$862.00
Payments from Trust Account on This Statement									- \$862.00
Unpaid Accounts Receivable Balance as of This Statement									\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00									
Therefore, please include the following amount in your next payment									\$862.00
<u>TOTAL BALANCE DUE NOW</u>									<u>\$862.00</u>

February 15, 2019
Statement # 30284
Page # 3

Recent Activity in Trust Account

Balance Forward

\$5,000.00

02/15/19 Payment for invoice: 30284

\$862.00

Your remaining Trust Account Balance is

\$4,138.00



The
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March 31, 2019

Statement # 30500

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/18/19	PL	Exchange communications w/ Client re: Coordinate meeting with Attorney Abrams and myself to discuss case strategy (0.2 at no charge)	0.00
03/19/19	PL	Conference w/ Attorney Abrams re: Opposing Party not providing supplemental discovery responses, discovery cut-off and other case related matters	0.20
03/20/19	AT	Conferences with Paralegal Stolz yesterday and today re: case related matters	0.20
	PL	Exchange communications w/ Court re: New Trial dates; Email to Client re: same and Conference w/ Attorney Abrams re: same; Update Client's file accordingly	0.20
03/22/19	AT	Meet with Client and Paralegal Stolz re: Case related matters	1.70
	PL	Obtain a file-stamped copy of the Case Management Order; Update Client's file accordingly; Calculate and calendar all deadlines therein; Email to Client re: same and Conference w/ Attorney Abrams re: same; Meeting with Client and Attorney Abrams re: Discuss case, strategy and next steps	2.10
03/25/19	PL	Conference w/ Attorney Abrams re: Discuss case related matters, including, following up with Opposing Counsel regarding Opposing Party's supplemental discovery responses	0.20
03/29/19	PL	Email to Opposing Counsel re: Demand for Opposing Party's supplemental discovery responses	0.20
03/31/19	AT	Telephone Conference to Opposing Counsel re: Gift tax issue and proposed resolution, factual history, and other case related matters; Text message to Client and exchange text messages with Client re: same	0.60

AA08085

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March 31, 2019
Statement # 30500
Page # 2

Total of	2.50	AT	Attorney Abrams'	Hours @	\$500.00	=	\$1,250.00
Total of	2.90	PL	Paralegal Stolz's	Hours @	\$176.38	=	\$511.50
Total for Services							\$1,761.50

Case Costs

Videography - Invoice Copy Attached	\$430.50	
Court Reporting Service (Invoice Copy Attached)	\$769.40	
E-Filing Fee	\$3.50	
E-Filing Fee	\$3.50	
Total for Costs		\$1,206.90

Total Fees and Costs on This Statement	\$2,968.40
Payments from Trust Account on This Statement	- \$2,968.40

Unpaid Accounts Receivable Balance as of This Statement	\$0.00
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Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$2,968.40

TOTAL BALANCE DUE NOW **\$2,968.40**

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
03/31/19 Payment for invoice: 30500		\$2,968.40
Your remaining Trust Account Balance is	\$2,031.60	

3/16/2019

COPY

The Abrams & Mayo Law Firm
Jennifer V. Abrams, Esq.
6252 S. Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118

Invoice Number

19094

Disc & Invoice Enclosed

Re: Thomas Pickens
Taken on 3/7/19
Pickens vs Michaels

Becky Ulrey
owner

Member of
The American
Guild of Court
Videographers

Case No. D-17-560737-D

Description of Services	Pgs/Qty	Rate	Extension
Initial 2 hours		250.00	250.00
Additional hours	0.5	95.00	47.50
Conversion to Videosync: 2:09 hrs	2.25	50.00	112.50
Delivery		20.50	20.50

Sales Tax (8.25%) \$0.00

Balance Due **\$430.50**

Tax ID No.: 20-4508812



WESTERN REPORTING SERVICES, INC.

801 South Rancho Drive • Suite E3B • Las Vegas, NV 89106
702/474-6255 • fax 702/474-6257
www.westernreportingservices.com
Federal ID No. 88-0263740

TERMS: NET 30 DAYS -
A Late Payment Charge of 5% per month
will be applied on balances 30 days or
more overdue.

DATE

INVOICE

3/21/2019

54082

TO:

IN RE:

Jennifer V. Abrams, Esq.
The Abrams & Mayo Law Firm
6252 South Rainbow Boulevard
Suite 100
Las Vegas, Nevada 89118

PICKENS V. MICHAELS

COPY

INVOICE

VIDEO DEPOSITION OF THOMAS PICKENS, VOLUME 1; 3/7/19

Reporter Attendance

95.00

Transcript, Original and Copy (Videotaped)

616.00

(Indexed and Compressed)

(Electronic Format)

Additional copy - NO CHARGE

0.00

Statutory administration of transcript subsequent to publication

20.00

Exhibits - Regular photocopies

38.40

ELECTRONIC FORMAT MADE AVAILABLE TO YOUR OFFICE ON 3/21/19

0.00

THANK YOU FOR YOUR BUSINESS!

REPORTER:

J. David

BALANCE DUE:

\$769.40

AA08088



The

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May 15, 2019

Statement # 30730

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
05/01/19	AT	Receive and review e-mail from Opposing Counsel re: Settlement; Left message for Client re: Same	0.20
05/02/19	AT	Receive and review email from Client re: [REDACTED]	0.20
05/03/19	AT	Review email and correspondence from Opposing Counsel; Draft counteroffer letter; Email to Client re: same	0.40
05/06/19	AT	Receive and review email from Client re: [REDACTED] [REDACTED] Revise counteroffer, [REDACTED]	0.50
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.30
05/08/19	AT	Telephone Conference from Opposing Counsel re: Opposition due, status of settlement negotiations, and related matters; Conference w/ Paralegal Stolz re: same	0.30
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters	0.20
	PL4	Prepare Notice of Unavailability for Attorney Abrams review and approval; Instructions to Legal Secretary re: Same	0.20
05/13/19	PL4	Review Reply and Opposition to Motion to Compel; E-mail Attorney Abrams and Paralegal Stolz re: Same and Client's responses to discovery requests	0.50
05/14/19	AT	Conference with Staff re: case related matters	0.30
	PL	Conferences with Attorney Abrams and Paralegal J. Schoen yesterday and today re: Discuss Opposing Party's Opposition to Motion to Compel, false allegation that Client did not	0.30

May 15, 2019

Statement # 30730

Page # 2

respond to Discovery Requests, responding to Opposition
and other case related matters

	PL4	Prepare Reply in Support of Motion to Compel for Attorney Abrams review and approval; Calculate dates for same	1.00
05/15/19	AT	Review, modify, and then approve Reply to Opposition to Motion to Compel; Conference with Paralegal J. Schoen re: same	0.40
	PL4	Finalize Reply in Support of Motion to Compel; Instructions to Legal Secretary re: Same	0.20

Total of 2.30 AT Attorney Abrams' Hours @ \$500.00 = \$1,150.00

Total of 0.80 PL Paralegal Stolz's Hours @ \$182.50 = \$146.00

Total of 1.90 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$332.50

Total for Services \$1,628.50

Case Costs

E-Filing Fee \$3.50

E-Filing Fee \$3.50

Total for Costs \$7.00

Total Fees and Costs on This Statement \$1,635.50

Payments from Trust Account on This Statement - \$1,635.50

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,635.50

TOTAL BALANCE DUE NOW \$1,635.50

Recent Activity in Trust Account

Balance Forward

May 15, 2019

Statement # 30730

Page # 3

\$5,000.00

05/15/19 Payment for invoice: 30730

\$1,635.50

Your remaining Trust Account Balance is

\$3,364.50



The

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May 31, 2019

Statement # 30807

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
05/17/19	PL4	E-mail Client re: [REDACTED] [REDACTED] E-mail Opposing Counsel copies of the Discovery Responses pursuant to her request	0.30
05/21/19	AT	Receive and review email from Opposing Counsel re: Tomorrow's hearing with supplemental documents; Conference with Paralegal J. Schoen and email to Client re: same; Review summary of information from Paralegal J. Schoen; Email to Client re: [REDACTED] [REDACTED]	0.60
	PL	Receive email from Opposing Counsel re: Proposal to resolve Motion to Compel; Email to Client re: same and Conference w/ Attorney Abrams re: same; Conferences with Attorney Abrams and Paralegal J. Schoen re: Case related matters, [REDACTED]	0.90
	PL4	Review documents received from Opposing Counsel; Send e-mail to Attorney Abrams and Paralegal Stolz re: Documents still not received; Calculate costs for Motion to Compel and all surrounding meetings, e-mails etc.; Send e-mail to Attorney Abrams and Paralegal Stolz re: Same; Review bank/credit card statements for charges related to Requests for Production of Documents	2.60
05/22/19	AT	Numerous communications with Opposing Counsel, Client, and staff re: Today's hearing and resolution of same, terms of stipulation and order, objections of Opposing Counsel, compromise language in Stipulation and Order, and vacating today's hearing; Telephone Conference to Client re:	1.40

AA08092

May 31, 2019
Statement # 30807
Page # 2

			Counteroffer; Instructions to Paralegal J. Schoen re: same; Review, modify, and then approve draft counteroffer						
	PL4		Multiple conferences with Attorney Abrams and e-mails exchanged with Opposing Counsel; Prepare Stipulation and Order re: Motion to Compel for Attorney Abrams review and approval, send same to Opposing Counsel; Exchange multiple e-mails re: Changes; Finalize same; Instructions to Legal Secretary re: Same; Telephone Conference with Court re: Status check clarification					2.20	
05/23/19	PL		Share Opposing Party's Disclosures with Client via DropBox and exchange emails w/ Client re: same (0.2 at no charge)					0.00	
05/24/19	PL4		Follow up with Client re: [REDACTED]					0.20	
05/28/19	PL4		Finalize Letter to Opposing Counsel; Instructions to Legal Secretary re: Same					0.20	
05/29/19	PL4		Prepare Notice of Entry of Stipulation and Order re: Motion to Compel; Instructions to Legal Secretary re: Same					0.20	
05/30/19	AT		Receive, review, and reply to email from Opposing Counsel; Left message for Opposing Counsel re: Settlement negotiations					0.20	
05/31/19	PL4		Review Supplemental Responses and disclosures received from Opposing Counsel; Compare to our last deficiency letter; E-mail Attorney Abrams and Paralegal Stolz re: Same					0.40	
Total of	2.20	AT	Attorney Abrams'	Hours @	\$500.00	=	\$1,100.00		
Total of	0.90	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$157.50		
Total of	6.10	PL4	Paralegal J. Schoen's	Hours @	\$175.00	=	\$1,067.50		
								Total for Services	\$2,325.00
Case Costs									
E-Filing Fee					\$3.50				
E-Filing Fee					\$3.50				
								Total for Costs	\$7.00

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May 31, 2019

Statement # 30807

Page # 3

Total Fees and Costs on This Statement **\$2,332.00**

Payments from Trust Account on This Statement **- \$2,332.00**

Unpaid Accounts Receivable Balance as of This Statement **\$0.00**

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment **\$2,332.00**

TOTAL BALANCE DUE NOW **\$2,332.00**

Recent Activity in Trust Account

Balance Forward

\$5,000.00

05/31/19 Payment for invoice: 30807

\$2,332.00

Your remaining Trust Account Balance is

\$2,668.00

AA08094



The

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June 30, 2019

Statement # 30940

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
06/17/19	PL	Exchange emails w/ Opposing Counsel re: Status of Opposing Party providing additional records as discovery hearing is coming up this week and receive Opposing Counsel's response regarding same; Conference w/ Attorney Abrams and Paralegal J. Schoen re: same	0.20
06/18/19	AT	Conference with Paralegal J. Schoen re: Documents provided by Opposing Counsel and any remaining issues; Conference w/ Paralegal Stolz re: same and Offer of Judgment; Instructions to staff re: Stipulation and Order to vacate tomorrow's hearing and related matters; Left Message for Client; Telephone Conference with Client and Paralegal Stolz re: [REDACTED]	0.60
	PL	Conference w/ Attorney Abrams and Paralegal J. Schoen re: Documents provided by Opposing Counsel and any remaining issues, Conference w/ Attorney Abrams re: Offer of Judgment and Stipulation and Order to vacate tomorrow's hearing and related matters; Left Message for Client; Email to Opposing Counsel re: Vacating tomorrow's hearing; Telephone Conference with Attorney Abrams and Client re: [REDACTED] [REDACTED] Draft Stipulation and Order to Vacate Discovery Hearing, for Attorney Abrams' review; Email to Opposing Counsel re: Attached Stipulation and Order, for review, approval and signature; Receive email from Opposing Counsel's office re: Attached signed Stipulation and Order; Exchange communications w/ Court re: same and confirm tomorrow's hearing was vacated; Email to Opposing Counsel re: same and Conference w/ Attorney Abrams re: same	1.10

AA08095

June 30, 2019
Statement # 30940
Page # 2

06/19/19	PL	Draft Notice of Entry of Stipulation and Order to Vacate Discovery Hearing and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same	0.20
06/20/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss discovery deadlines and other case related matters; [REDACTED] [REDACTED] [REDACTED] Draft Correspondence to Opposing Counsel re: Objection to Opposing Party's Third Supplemental Production of Documents Pursuant to NRCP 16.2, per Attorney Abrams' instructions; Instructions to Legal Secretary re: same; Conference w/ Attorney Abrams re: [REDACTED] [REDACTED] Email to Client re: Attached Discovery Requests propounded by Opposing Counsel and instructions for responding to same; Calculate and calendar deadline for Responses; Draft Offer of Judgment, for Attorney Abrams' review	1.60
06/21/19	PL4	Frame out Discovery Requests for Paralegal S. Stolz	1.00
06/24/19	AT	Review, modify, and then approve Offer of Judgment; Receive and review documents from Opposing Counsel re: Discovery requests; Receive, review, and reply to email from Client re: [REDACTED] Email to Opposing Counsel re: Meet and confer before we file a motion for protective order	0.40
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Email to Client re: Attached draft Offer of Judgment, for review and approval; Receive, review, and reply to email from Client re: Approval; Instructions to Legal Secretary re: same; Calculate and calendar deadline for Opposing Party's response	0.40
06/26/19	AT	Prepare for and telephone conference with Opposing Counsel re: Narrowing discovery requests; Instructions to Paralegal J. Schoen re: confirming letter; Conference w/ Paralegal Stolz re: same and other case related matters	0.90
	PL	Exchange communications w/ Opposing Counsel yesterday and today re: Coordinate telephone conference with Attorney Abrams to discuss issues with discovery	0.30

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June 30, 2019
Statement # 30940
Page # 3

propounded upon Client; Conference w/ Attorney Abrams
today re: same and discuss other case related matters

PL4 Conference with Attorney Abrams re: Letter to Opposing Counsel; Begin drafting letter 0.40

Total of 2.10 AT Attorney Abrams' Hours @ \$500.00 = \$1,050.00

Total of 3.80 PL Paralegal Stolz's Hours @ \$176.05 = \$669.00

Total of 1.40 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$245.00

Total for Services \$1,964.00

Case Costs

E-Filing Fee \$3.50

E-Filing Fee \$3.50

Total for Costs \$7.00

Total Fees and Costs on This Statement \$1,971.00

Payments from Trust Account on This Statement - \$1,971.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$1,971.00

TOTAL BALANCE DUE NOW \$1,971.00

Recent Activity in Trust Account

Balance Forward

\$5,000.00

06/30/19 Payment for invoice: 30940

\$1,971.00

Your remaining Trust Account Balance is

\$3,029.00

AA08097



The

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July 15, 2019

Statement # 31015

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
07/03/19	PL4	Finish letter for Attorney Abrams review and edit	0.30
07/05/19	AT	Review, modify, and then approve correspondence to Opposing Counsel re: Narrowed scope of discovery; Email to Client re: same; Conference w/ Paralegal Stolz re: Status of Offer of Judgment and other case related matters; Receive and review email from Client re: [REDACTED]	0.40
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters	0.20
	PL4	Receive approval from Attorney Abrams and finalize letter	0.20
07/08/19	AT	Strategy meeting with Attorney Mayo re: [REDACTED]	0.20
	AT2	Conference w/ Attorney Abrams re: Case strategy	0.20
	PL	Receive, review, and reply to email from Client re: [REDACTED]	0.20
		[REDACTED] Conference w/ Attorney Abrams re: Discuss case related matters	
07/10/19	PL	Exchange emails w/ Opposing Counsel yesterday and today re: Request and receive an extension of time for Client's Discovery Responses; Conference w/ Attorney Abrams re: same and discuss case related matters; Email to Client re: same (combined entry)	0.30
07/11/19	PL	Receive, review, and reply to email from Client re: [REDACTED]	0.20
Total of	0.60 AT	Attorney Abrams'	Hours @ \$500.00 = \$300.00
Total of	0.20 AT2	Attorney Mayo's	Hours @ \$450.00 = \$90.00
Total of	0.90 PL	Paralegal Stolz's	Hours @ \$175.00 = \$157.50

AA08098

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July 15, 2019

Statement # 31015

Page # 2

Total of 0.50 PL4 Paralegal J. Schoen's Hours @ \$175.00 = \$87.50

Total for Services \$635.00

Total Fees and Costs on This Statement \$635.00

Payments from Trust Account on This Statement - \$635.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$635.00

TOTAL BALANCE DUE NOW \$635.00

Recent Activity in Trust Account

Balance Forward

\$5,000.00

07/15/19 Payment for invoice: 31015

\$635.00

Your remaining Trust Account Balance is

\$4,365.00

AA08099



The

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July 31, 2019

Statement # 31077

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
07/23/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conferences w/ Attorney Abrams yesterday and today re: Discuss Motion to Dismiss; Begin draft of Motion to Dismiss; Research Opposing Party's prior divorce; Conference w/ Attorney Abrams re: same	1.40
07/24/19	PL	Continue working on Motion to Dismiss; Receive and review Correspondence from Opposing Counsel re: Discovery; Conference w/ Attorney Abrams re: same	1.60
07/25/19	PL	Complete initial draft of Motion to Dismiss, for Attorney Abrams' review	3.00
07/26/19	AT	Initial review and modification of draft Motion to Dismiss	2.10
	PL	Conference w/ Attorney Abrams re: Discuss Opposing Counsel's request to continue Trial and agreement on same; Email to Opposing Counsel re: Request for a proposed Stipulation and Order	0.20
07/29/19	AT	Insert case law and final revisions to Motion to Dismiss etc.; Several conferences with Paralegal Stolz re: same	1.20
	PL	Conduct research and work on completing final draft of Motion for Summary Judgment, to Dismiss, for Protective Order, and for Attorney Fees, per Attorney Abrams' instructions; Several conferences w/ Attorney Abrams re: same; Email to Client re: Attached Motion, for review and approval	1.60
07/30/19	AT	Conference w/ Paralegal Stolz re: Discovery, continuance, and other case related matters	0.20
	PL	Receive and review email and attachment from Opposing Counsel re: Attached proposed Stipulation and Order continuing Trial and deadlines; Conference w/ Attorney Abrams re: same; Email to Client re: same; Email to	0.40

AA08100

July 31, 2019
Statement # 31077
Page # 2

		Opposing Counsel re: Attached signed Stipulation and Order; Email to Client re: same					
07/31/19	AT	<div></div>				4.60	
		Review and finalize entire motion; Review and approve exhibits; Conference w/ Paralegal Stolz re: same and other case related matters					
	PL	Finalize Motion, per Attorney Abrams' instructions; Email to Client re: same; Draft Appendix of Exhibits in Support of Motion, for Attorney Abrams' review; Several conferences w/ Attorney Abrams yesterday and today re: Discussing Motion and other case related matters				1.50	
Total of	8.30	AT	Attorney Abrams'	Hours @	\$500.00	=	\$4,150.00
Total of	9.70	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$1,697.50
Total for Services							\$5,847.50
Total Fees and Costs on This Statement							\$5,847.50
Payments from Trust Account on This Statement							- \$5,000.00
Unpaid Accounts Receivable Balance as of This Statement							\$847.50
Your required minimum Trust Account Balance at this time is							\$5,000.00
Therefore, please include the following amount in your next payment							\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>							<u>\$5,847.50</u>

Recent Activity in Trust Account		Balance Forward
		\$5,000.00
07/31/19	Payment for invoice: 31077	\$5,000.00
Your remaining Trust Account Balance is		\$0.00



The

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August 15, 2019

Statement # 31165

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/01/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Finalize Motion and Appendix; Instructions to Legal Secretary re: same; Conference w/ Attorney Abrams re: Discuss case related matters; Receive, review, and reply to email from Client re: [REDACTED]; Obtain information that Trial was continued; Conference w/ Attorney Abrams re: same; Exchange emails w/ Client today and on August 2nd re: [REDACTED] Conference w/ Attorney Abrams re: same	0.50
08/05/19	AT	Receive, review, and reply to email from Opposing Counsel re: Additional time to oppose Motion for Summary Judgment and related matters	0.20
	PL	Receive and review Stipulation and Order to Extend Discovery Deadlines and Continue Trial and calculate and calendar all new deadlines therein; Conference w/ Attorney Abrams re: Discuss case related matters	0.40
	PL4	Prepare Notice of Unavailability for Attorney Abrams review and approval; Instructions to Legal Secretary re: Same (0.2 at no charge)	0.00
08/06/19	PL	Draft Declaration of Robert Semonian, for Attorney Abrams' review; Conference w/ Attorney Abrams today and on August 7th re: Opposing Counsel's request for additional time for the Opposition and our request to respond to discovery following the hearing	0.40
08/08/19	AT	Receive, review, and reply to email from Opposing Counsel (yesterday) and Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Opposing Counsel not agreeing to further extend deadline for Client's Discovery	0.20

AA08102

August 15, 2019
Statement # 31165
Page # 2

			Responses and receive instructions to prepare responses and discuss same				
08/12/19	AT		Receive and review documents from Opposing Counsel re: Opposition; Review prior communications and email to Opposing Counsel re: Request that she correct her misrepresentation to the Court	0.30			
08/13/19	AT		Conference w/ Paralegal Stolz re: Discovery responses and objections thereto	0.20			
	PL		Work on Client's Responses to First Request for Production of Documents and First Set of Interrogatories; Conferences w/ Attorney Abrams re: same	2.20			
08/14/19	AT		Conference w/ Paralegal Stolz re: Responses to specific discovery requests from Opposing Counsel; Review, modify, and then approve draft Responses to Request for Production of Documents and email to Client re: same	0.70			
	PL		Complete Responses to First Request for Production of Documents, for Attorney Abrams' review; Email to Robert Semonian re: Attached Declaration, for edit, approval and signature, per Attorney Abrams' instructions	2.60			
08/15/19	AT		Conference w/ Paralegal Stolz re: [REDACTED]	0.20			
	PL		Conference w/ Attorney Abrams re: [REDACTED]	0.50			
			[REDACTED] Finalize Responses to First Request for Production of Documents; Serve same				
Total of	2.00	AT	Attorney Abrams'	Hours @	\$500.00	=	\$1,000.00
Total of	6.80	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$1,190.00
Total for Services							\$2,190.00
Case Costs							
			E-Filing Fee		\$3.50		
			E-Filing Fee		\$3.50		
			E-Filing Fee		\$3.50		
Total for Costs							\$10.50

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August 15, 2019
Statement # 31165
Page # 3

Total Fees and Costs on This Statement	\$2,200.50
Payments from Trust Account on This Statement	- \$2,200.50
Unpaid Accounts Receivable Balance as of This Statement	\$0.00
Your required minimum Trust Account Balance at this time is \$5,000.00	
Therefore, please include the following amount in your next payment	\$2,200.50
<u>TOTAL BALANCE DUE NOW</u>	<u>\$2,200.50</u>

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
08/15/19 Payment for invoice: 31165		\$2,200.50
Your remaining Trust Account Balance is	\$2,799.50	



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September 15, 2019

Statement # 31254

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/02/19	PL	Email to Opposing Counsel re: Client and Attorney Abrams' availability for scheduling Client's deposition prior to hearing	0.20
09/03/19	AT	Exchange communications with Opposing Counsel re: Scheduling deposition; Memo to Paralegal Stolz re: use of Opposing Party's deposition testimony in Motion	0.20
	PL	Exchange communications w/ Opposing Counsel re: Coordinating Client's deposition; Exchange emails w/ Client re: same; Begin draft of Reply to Opposition to Defendant's Motion for Summary Judgment, etc.; Exchange communications w/ Client re: same; Conference w/ Attorney Abrams re: same	1.40
09/04/19	PL	Receive, review, and reply to email from Opposing Counsel re: No longer in agreement for date and time set for Client's deposition; Email to Client re: same and Conference w/ Attorney Abrams re: same; Complete initial draft of Reply to Opposition to Defendant's Motion for Summary Judgment, for Attorney Abrams' review	0.80
09/05/19	AT	Conference w/ Paralegal Stolz re: Discovery, status, and timing issues	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters; Email to Client re: [REDACTED]	0.30
09/06/19	AT	Review, modify, and then approve Reply to Opposition	1.30
	PL	Receive, review, and reply to email from Client re: [REDACTED]	1.90
		[REDACTED] Exchange emails w/ Opposing Counsel re: Discuss different options for scheduling Client's deposition and schedule same and other case related matters;	

September 15, 2019

Statement # 31254

Page # 2

Exchange emails w/ Client re: same; Conference w/ Attorney Abrams re: same and discuss case related matters; Email to Client re: Attached Reply to Opposition, for review and approval; Conference w/ Attorney Abrams re: Discuss information for finalizing Reply; Finalize Reply and draft Appendix of Exhibits in Support of Reply; E-file and serve same; Email to Client re: Attached final Reply

09/07/19	AT	Receive and review emails from Client re: [REDACTED]	1.00
09/09/19	AT	Telephone Conference to Opposing Counsel re: Discovery, depositions, upcoming hearing, and other case related matters; Conference w/ Paralegal Stolz re: same	0.40
	PL	Receive email from Opposing Counsel re: Rescheduling Client's deposition; Email to Client re: same and Conference w/ Attorney Abrams re: same and discuss related matters	0.20
09/10/19	AT	Receive and review today's Minute Order; Conference w/ Paralegal Stolz re: same and discuss related matters	0.40
	PL	Receive voice mail from and telephone conference to Court re: Judge is issuing a Decision and tomorrow's hearing is vacated; Email to Client re: same and Conference w/ Attorney Abrams re: same; Receive and review today's Minute Order; Conference w/ Attorney Abrams re: same	0.60
09/12/19	PL	Conference w/ Attorney Abrams re: Discuss status of Client's discovery responses, EDCR conference, case status and related matters; Email to Opposing Counsel re: EDCR 5.602 conference should take place following Attorney Evans' deposition	0.20

Total of 3.50 AT Attorney Abrams' Hours @ \$500.00 = \$1,750.00

Total of 7.60 PL Paralegal Stolz's Hours @ \$176.58 = \$1,342.00

Total for Services \$3,092.00

Case Costs

Courier Service	\$15.00
E-Filing Fee	\$3.50

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September 15, 2019
Statement # 31254
Page # 3

	Total for Costs	\$18.50
Total Fees and Costs on This Statement		\$3,110.50
Payments from Trust Account on This Statement	-	\$3,110.50
Unpaid Accounts Receivable Balance as of This Statement		\$0.00
Your required minimum Trust Account Balance at this time is	\$5,000.00	
Therefore, please include the following amount in your next payment		\$4,343.00
	<u>TOTAL BALANCE DUE NOW</u>	<u>\$4,343.00</u>

Recent Activity in Trust Account	Balance Forward	
	\$3,767.50	
09/15/19 Payment for invoice: 31254		\$3,110.50
Your remaining Trust Account Balance is	\$657.00	



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September 30, 2019

Statement # 31318

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/16/19	PL	Receive email from Opposing Counsel re: A conflict has come up in Opposing Counsel's schedule and they need to reschedule Client's deposition again; Email to Client re: Request for Client's availability for rescheduling her deposition	0.20
09/17/19	AT	Prepare for and represent Client at Deposition of Shannon Evans; Meeting with Opposing Counsel re: Due date for discovery responses and possible settlement; Conference w/ Paralegal Stolz re: [REDACTED]	2.40
	PL	Conference w/ Attorney Abrams re: Discuss case related matters	0.20
09/18/19	PL	Conference w/ Attorney Abrams re: Discuss Opposing Counsel's 5th Supplemental Production of Documents and no need to object to same	0.20
09/23/19	PL	Exchange emails w/ Client on September 19th re: Availability for rescheduling Client's deposition; Email to Opposing Counsel on September 23rd re: same (combined entry)	0.20
09/26/19	PL	Exchange emails w/ Client and Opposing Counsel re: Agree upon a date and time for rescheduling Client's deposition; Update calendar accordingly	0.20
09/27/19	AT	Receive and review documents from Opposing Counsel re: Notice of Intent to Issue Subpoena Duces Tecum; Conference w/ Paralegal Stolz re: same	0.20
09/29/19	PL	Conference w/ Attorney Abrams on September 27th re: Discuss Subpoena Duces Tecum being issued to Summit Medical Group; Email to Client today re: same (combined entry)	0.20

September 30, 2019
Statement # 31318
Page # 2

Total of	2.60	AT	Attorney Abrams'	Hours @	\$500.00	=	\$1,300.00
Total of	1.20	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$210.00
Total for Services							\$1,510.00
Total Fees and Costs on This Statement							\$1,510.00
Payments from Trust Account on This Statement							- \$1,510.00
Unpaid Accounts Receivable Balance as of This Statement							\$0.00
Your required minimum Trust Account Balance at this time is							\$5,000.00
Therefore, please include the following amount in your next payment							\$1,510.00
<u>TOTAL BALANCE DUE NOW</u>							<u>\$1,510.00</u>

Recent Activity in Trust Account		Balance Forward	
		\$5,000.00	
09/30/19	Payment for invoice: 31318		\$1,510.00
Your remaining Trust Account Balance is		\$3,490.00	



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October 15, 2019
Statement # 31416
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
10/01/19	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
10/04/19	AT	Conferences with Paralegal Stolz on 10/1 and today re: case related matters	0.20
	PL	Exchange emails w/ Client yesterday and today re: [REDACTED] [REDACTED] Conferences w/ Attorney Abrams re: Case related matters	0.20
10/07/19	AT	Review, modify, and then approve Supplemental Responses to Request for Production of Documents; Conference w/ Paralegal Stolz re: same	1.00
	PL	Exchange communications w/ Client yesterday and today re: Supplemental Discovery Responses and related matters; Draft Client's Supplemental Discovery Responses, including, redacting and bates stamping documents, for Attorney Abrams' review; Serve same upon Opposing Counsel's office and exchange communications w/ Opposing Counsel's office re: same	4.50
10/08/19	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Email to Client re: [REDACTED] [REDACTED]	0.30
10/11/19	AT	Conferences with Paralegal Stolz on 10/8 and today re: case related matters	0.20
	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.30

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October 15, 2019

Statement # 31416

Page # 2

Total of	1.40	AT	Attorney Abrams'	Hours @	\$500.00	=	\$700.00
Total of	5.50	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$962.50
					Total for Services		\$1,662.50

Case Costs

Court Reporting Service (Invoice Copy Attached)	\$384.60
Total for Costs	\$384.60

Total Fees and Costs on This Statement	\$2,047.10
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Payments from Trust Account on This Statement	- \$2,047.10
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Unpaid Accounts Receivable Balance as of This Statement	\$0.00
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Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment	\$2,047.10
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<u>TOTAL BALANCE DUE NOW</u>	<u>\$2,047.10</u>
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Recent Activity in Trust Account

Balance Forward

	\$5,000.00	
10/15/19 Payment for invoice: 31416		\$2,047.10
Your remaining Trust Account Balance is	\$2,952.90	

AA08111

INVOICE



Litigation
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Invoice No.	Invoice Date	Job No.
1340130	10/2/2019	574900
Job Date	Case No.	
9/17/2019		
Case Name		
Pickens, Thomas vs. Michaels, Danka		
Payment Terms		
Net 15		

One Certified Copy - Deposition of:
Shannon Evans, Esq.

384.60

TOTAL DUE >>>

\$384.60

Please note, disputes or refunds will not be honored or issued after 30 days

COPY

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Phone: (702) 222-4021 Fax: (702) 248-9750

Please detach bottom portion and return with payment.

Jennifer V. Abrams, Esq.
The Abrams & Mayo Law Firm
6252 So. Rainbow Blvd., #100
Las Vegas, NV 89118

Invoice No. : 1340130
Invoice Date : 10/2/2019
Total Due : \$ 384.60

Remit To: **Litigation Services and Technologies of
Nevada, LLC
P.O. Box 98813
Las Vegas, NV 89193-8813**

Job No. : 574900
BU ID : LV-CR
Case No. :
Case Name : Pickens, Thomas vs. Michaels, Danka

AA08112



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October 31, 2019
Statement # 31451
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
10/16/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Draft Second Supplement to Client's Responses to the Request for Production of Documents, for Attorney Abrams' review; Conference w/ Attorney Abrams re: Discuss case related matters	0.40
10/21/19	PL	Update the Offer of Judgment and Second Supplemental Responses to Request for Production of Documents, for Attorney Abrams' review; Begin working on Client's Financial Disclosure Form; Email to Client re: [REDACTED] Conference w/ Attorney Abrams re: same	1.80
10/22/19	AT	Conferences with Paralegal Stolz yesterday and today re: case related matters	0.20
	PL	Receive email from Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
10/31/19	AT	Telephone Conference to Client re: [REDACTED] [REDACTED]	0.50
Total of	0.90 AT	Attorney Abrams'	Hours @ \$500.00 = \$450.00
Total of	2.40 PL	Paralegal Stolz's	Hours @ \$175.00 = \$420.00
			Total for Services \$870.00
Total Fees and Costs on This Statement			\$870.00
Payments from Trust Account on This Statement			- \$870.00

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October 31, 2019
Statement # 31451
Page # 2

Unpaid Accounts Receivable Balance as of This Statement	\$0.00
Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$870.00
<u>TOTAL BALANCE DUE NOW</u>	<u>\$870.00</u>

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
10/31/19 Payment for invoice: 31451		\$870.00
Your remaining Trust Account Balance is	\$4,130.00	



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November 15, 2019
Statement # 31516
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/01/19	AT	Telephone Conference from Client re: [REDACTED] [REDACTED] Conference w/ Paralegal Stolz re: same	0.20
	PL	Conference w/ Attorney Abrams re: Discuss outstanding issues and case related matters	0.20
11/15/19	AT	Review, modify, and then approve Second Offer of Judgment; Conference w/ Paralegal Stolz re: same	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters	0.20
Total of	0.40 AT	Attorney Abrams'	Hours @ \$500.00 = \$200.00
Total of	0.40 PL	Paralegal Stolz's	Hours @ \$175.00 = \$70.00
Total for Services			\$270.00
Total Fees and Costs on This Statement			\$270.00
Payments from Trust Account on This Statement			- \$270.00
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$270.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$270.00</u>

November 15, 2019
Statement # 31516
Page # 2

Recent Activity in Trust Account		Balance Forward	
		\$5,000.00	
11/15/19	Payment for invoice: 31516		\$270.00
Your remaining Trust Account Balance is		\$4,730.00	



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November 30, 2019
Statement # 31589
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/18/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Draft email to Client re: Attached Second Offer of Judgment, for review and approval, and related matters, for Attorney Abrams' review; Send email to Client, per Attorney Abrams' instructions	0.20
11/19/19	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	[REDACTED]	0.80
11/21/19	AT	Conference w/ Paralegal Stolz re: Second Offer of Judgment and related matters	0.20
	PL	Finalize the Second Offer of Judgment, per Attorney Abrams' instructions; Instructions to Legal Secretary re: same	0.20
11/26/19	PL	Follow up email to Client re: [REDACTED]	0.20

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November 30, 2019
Statement # 31589
Page # 2

Total of	0.60	AT	Attorney Abrams'	Hours @	\$500.00	=	\$300.00
Total of	1.40	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$245.00
Total for Services							\$545.00
Total Fees and Costs on This Statement							\$545.00
Payments from Trust Account on This Statement							- \$545.00
Unpaid Accounts Receivable Balance as of This Statement							\$0.00
Your required minimum Trust Account Balance at this time is							\$5,000.00
Therefore, please include the following amount in your next payment							\$545.00
<u>TOTAL BALANCE DUE NOW</u>							<u>\$545.00</u>

Recent Activity in Trust Account		Balance Forward	
		\$5,000.00	
11/30/19	Payment for invoice: 31589		\$545.00
Your remaining Trust Account Balance is		\$4,455.00	



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December 15, 2019
Statement # 31656
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/02/19	AT	Receive and review email from Opposing Counsel re: Offer of Judgment, Left message for Opposing Counsel re: same	0.20
	PL	Conference w/ Attorney Abrams re: Discuss today's email from Opposing Counsel and related matters; Receive email from Client re: [REDACTED] Draft Subpoena Duces Tecum, Seven Day Notice and Notice of Taking Deposition for Wells Fargo, all for Attorney Abrams' review	0.70
12/06/19	AT	Review, modify, and then approve Subpoena Duces Tecum to Wells Fargo; Conference w/ Paralegal Stolz re: same	0.20
12/09/19	PL	Finalize Subpoena Duces Tecum, Seven Day Notice and Notice of Taking Deposition for Wells Fargo; Instructions to Legal Secretary re: same; Receive, review, and reply to email from Client re: same	0.20
12/10/19	AT	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conference w/ Paralegal Stolz re: Preparation for trial	0.20
	PL	Receive and review Opposing Party's Offer of Judgment on December 9th; Conference w/ Attorney Abrams on December 9th and today re: Discuss Opposing Party's offer, next steps and other case related matters	0.20
12/12/19	PL	Conference w/ Attorney Abrams re: Discuss discovery deadlines and other case related matters	0.20
Total of	0.60 AT	Attorney Abrams'	Hours @ \$500.00 = \$300.00
Total of	1.30 PL	Paralegal Stolz's	Hours @ \$175.00 = \$227.50
			Total for Services \$527.50

December 15, 2019
Statement # 31656
Page # 2

Case Costs

E-Filing Fee	\$3.50	
Total for Costs		\$3.50

Total Fees and Costs on This Statement		\$531.00
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Payments from Trust Account on This Statement	-	\$531.00
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Unpaid Accounts Receivable Balance as of This Statement		\$0.00
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Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment		\$531.00
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<u>TOTAL BALANCE DUE NOW</u>		<u>\$531.00</u>
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Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
12/15/19 Payment for invoice: 31656		\$531.00
Your remaining Trust Account Balance is	\$4,469.00	



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December 31, 2019
Statement # 31722
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/17/19	AT	Meeting with Paralegal Stolz to discuss case and discovery related matters	0.60
	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Meeting with Attorney Abrams to discuss case and discovery related matters	0.70
12/18/19	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED] Review Client's file for certain documents and information; Conferences w/ Attorney Abrams re: Discuss same and case related matters; Emails to Shannon Evans and Robert Semonian re: Trial dates and their appearances as a witnesses and related matters	2.20
12/19/19	AT	Conferences with Paralegal Stolz yesterday and today re: case related matters	0.20
	PL	Finalize Client's Second Supplemental Responses to Request for Production of Documents; Instructions to Legal Secretary re: same; Receive, review, and reply to email from Shannon Evan's office re: Her availability to testify; Conference w/ Attorney Abrams re: same; Receive, review, and reply to email from Client on December 20th re: [REDACTED] (Combined entry)	0.40
12/27/19	AT	Review, modify, and then approve Second Supplemental Witness List; Conference w/ Paralegal Stolz re: same	0.20
	PL	Follow up email to Client [REDACTED] [REDACTED] Draft Client's Second Supplemental Witness List and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same	0.40
12/30/19	AT	Conference w/ Paralegal Stolz re: [REDACTED] Review, modify, and then approve Disclosures	0.20

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ABRAMS & MAYO

Law Firm

December 31, 2019

Statement # 31722

Page # 2

PL	Exchange emails w/ Client re: [REDACTED]	0.40
	[REDACTED] Conference w/ Attorney Abrams re: same; Draft Client's Fifth Set of 16.2 Disclosures and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same	

Total of	1.20	AT	Attorney Abrams'	Hours @	\$500.00	=	\$600.00
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Total of	4.10	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$717.50
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Total for Services	\$1,317.50
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Case Costs

Special Process Service - Invoice Copy Attached	\$45.00
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E-Filing Fee	\$3.50
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E-Filing Fee	\$3.50
--------------	--------

Total for Costs	\$52.00
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Total Fees and Costs on This Statement	\$1,369.50
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Payments from Trust Account on This Statement	- \$1,369.50
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Unpaid Accounts Receivable Balance as of This Statement	\$0.00
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Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment	\$1,369.50
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<u>TOTAL BALANCE DUE NOW</u>	<u>\$1,369.50</u>
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Recent Activity in Trust Account

Balance Forward

\$5,000.00

12/31/19 Payment for invoice: 31722

\$1,369.50

Your remaining Trust Account Balance is

\$3,630.50

AA08122

NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3,
Las Vegas, NV89102
PH (702) 669-7378
Federal Tax ID: 46-0745697
NEVADA STATE LIC#1361
www.nowservicelv.com

Invoice #: 31995
Date: 12/19/2019

COPY

INVOICE FOR SERVICE:

**The Abrams Law Firm, LLC
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV89118**

Requestor: Chantel
Your File#

Service #33865: WELLS FARGO BANK, NATIONAL ASSOCIATION
Manner of Service: SUITABLEBUS
Person Served: Marisol Perales

Service Date/Time: 12/18/2019 3:55 PM
Service address: 4016 S. Rainbow Blvd. Las Vegas NV89103
Served by: Mike Nettles

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Brown	40's	5'07	170
Other Features:					

Amount Due: \$45.00

Phone number: 702-222-4021
Fax number: 702-248-9750
Email
Address: sstolz@theabramslawfirm.com

**DISTRICT COURT - FAMILY DIVISION - CLARK COUNTY,
NEVADA
THOMAS A. PICKENS v. DANKA K. MICHAELS**

CASE#: D-17-560737

Service Documents: SUBPOENA DUCES TECUM; NOTICE OF TAKING CUSTODIAN OF RECORDS DEPOSITION AND
SEVEN DAY NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

Service Comments:

Standard Service	4016 S. Rainbow Blvd. Las Vegas NV 89103	\$45.00
TOTAL CHARGES:		\$45.00
BALANCE:		\$45.00



The
ABRAMS & MAYO
Law Firm

Dr. Danka Michaels
9517 Queen Charlotte Drive
Las Vegas, Nevada 89145

Jennifer V. Abrams, Esq.
Vincent Mayo, Esq.

6252 South Rainbow Blvd.
Suite 100
Las Vegas, Nevada 89118
Telephone (702) 222-4021
Facsimile (702) 248-9750

January 15, 2020
Statement # 31788
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/06/20	AT	Conference w/ Paralegal Stolz re: Opposing Counsel's request to take Client's deposition and records from bank in response to Subpoena Duces Tecum	0.20
	PL	Receive email from Opposing Counsel re: Request to reschedule Client's deposition; Email to Client re: same and Conference w/ Attorney Abrams re: same; Conference w/ Attorney Abrams re: Discuss records we received from Wells Fargo and related matters	0.40
01/09/20	PL	Receive follow up email from Opposing Counsel requesting to reschedule Client's deposition; Conference w/ Attorney Abrams re: same and Email to Client re: same; Exchange emails w/ Client re: Discuss availability; Exchange emails w/ Opposing Counsel re: same	0.20
01/10/20	PL	Exchange several emails with Opposing Counsel working out date and timing of Client's deposition; Exchange emails w/ Client re: same; Conferences w/ Attorney Abrams re: same	0.20
01/13/20	PL	Email to Client re: [REDACTED]	0.20
01/14/20	PL	Conference w/ Attorney Abrams re: Upcoming dates and deadlines and discuss other case related matters; Exchange emails w/ Client today and on January 15th re: [REDACTED] [REDACTED] (Combined entry)	0.40
Total of	0.20 AT	Attorney Abrams'	Hours @ \$500.00 = \$100.00
Total of	1.40 PL	Paralegal Stolz's	Hours @ \$175.00 = \$245.00
Total for Services			\$345.00

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January 15, 2020
Statement # 31788
Page # 2

Total Fees and Costs on This Statement		\$345.00
Payments from Trust Account on This Statement	-	\$345.00
Unpaid Accounts Receivable Balance as of This Statement		\$0.00
Your required minimum Trust Account Balance at this time is	\$5,000.00	
Therefore, please include the following amount in your next payment		\$345.00
<u>TOTAL BALANCE DUE NOW</u>		<u>\$345.00</u>

Recent Activity in Trust Account	Balance Forward	
	\$5,000.00	
01/15/20 Payment for invoice: 31788		\$345.00
Your remaining Trust Account Balance is	\$4,655.00	



The
ABRAMS & MAYO
Law Firm

Dr. Danka Michaels
9517 Queen Charlotte Drive
Las Vegas, Nevada 89145

Jennifer V. Abrams, Esq.
Vincent Mayo, Esq.

6252 South Rainbow Blvd.
Suite 100
Las Vegas, Nevada 89118
Telephone (702) 222-4021
Facsimile (702) 248-9750

January 31, 2020
Statement # 31856
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/21/20	AT	Telephone conference to Client re: [REDACTED]	1.00
01/22/20	AT	Email to Client re: Case related matters	0.20
	PL	Email to Client re: [REDACTED]	0.20
01/23/20	AT	Represent Client at deposition; Discussion re: Possibility of settlement	5.10
	PL	Receive email from Shannon Evans' office re: Timing of testimony for Trial; Conference w/ Attorney Abrams re: same	0.20
01/24/20	AT	Receive and review documents from Opposing Counsel re: Disclosures; Skim and conference with Paralegal Stolz re: same; Review, modify, and then approve Disclosures	2.40
	PL	Review Client's file and draft Client's Sixth Set of 16.2 Disclosures and Certificate of Service, for Attorney Abrams' review; Conference w/ Attorney Abrams re: same; Instructions to Legal Secretary re: same; Conference w/ Attorney Abrams re: Discuss case related matters	1.10
01/27/20	PL	Conference w/ Attorney Abrams re: Discuss case related matters	0.20
01/28/20	AT	Review, modify, and then approve trial subpoenas and correspondence to Opposing Counsel re: Objection to authenticity	0.20
	PL	Email to Client re: [REDACTED]	1.10
		[REDACTED] Draft Trial Subpoenas for Shannon Evans and Robert Semonian, for Attorney Abrams' review; Draft Correspondence to Opposing Counsel objecting to Opposing Party's Sixth Supplemental Production of Documents, for Attorney Abrams' review;	

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January 31, 2020
Statement # 31856
Page # 2

Instructions to Legal Secretary re: same; Email to Shannon Evans' office re: Trial Subpoena information; Email to Robert Semonian re: Trial Subpoena and related information

01/29/20	AT	Prepare for trial - create master summary of all disclosures	6.00
	PL	Receive, review, and reply to email from Robert Semonian re: Confirm service of the Subpoena; Begin working on Client's Pre-Trial Memorandum; Conference w/ Attorney Abrams re: same and discuss other case related matters	1.20
01/31/20	AT	Telephone Conference from Opposing Counsel re: Exhibits for trial, witnesses, and related matters	0.20

Total of 15.10 AT Attorney Abrams' Hours @ \$500.00 = \$7,550.00

Total of 4.00 PL Paralegal Stolz's Hours @ \$175.00 = \$700.00

Total for Services \$8,250.00

Case Costs

Witness Fee - Shannon Evans, Esq.
E-Filing Fee

\$25.00
\$3.50

Total for Costs \$28.50

Total Fees and Costs on This Statement \$8,278.50

Payments from Trust Account on This Statement - \$5,000.00

Unpaid Accounts Receivable Balance as of This Statement \$3,278.50

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$5,000.00

TOTAL BALANCE DUE NOW \$8,278.50

Recent Activity in Trust Account

Balance Forward

AA08127

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January 31, 2020
Statement # 31856
Page # 3

		\$5,000.00	
01/31/20	Payment for invoice: 31856		\$5,000.00
Your remaining Trust Account Balance is		\$0.00	



The
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Las Vegas, Nevada 89145

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Vincent Mayo, Esq.

6252 South Rainbow Blvd.
Suite 100
Las Vegas, Nevada 89118
Telephone (702) 222-4021
Facsimile (702) 248-9750

February 15, 2020
Statement # 31925
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
02/02/20	AT	Review Opposing Counsel's witness list; Email to Client re: same	0.20
02/03/20	AT	Review and summarize Opposing Counsel's Opposition to Motion for Summary Judgment and causes of action in the Second Amended Complaint for Divorce; Exchange communications with Opposing Counsel re: Pretrial Memorandum and Exhibit deadlines and other case related matters	0.60
	PL	Follow up email to Client [REDACTED] Conferences w/ Attorney Abrams re: Discuss case related matters	0.30
02/04/20	AT	Exchange communications with Ms. Evans' office, Opposing Counsel and Paralegal Stolz re: Scheduling of witnesses and other case related matters	0.20
	PL	Exchange emails w/ Opposing Counsel's office re: They provided, Attorney Abrams signed and I returned the Stipulation and Order continuing deadlines; Conference w/ Attorney Abrams re: same	0.20
02/05/20	PL	Exchange emails w/ Opposing Counsel re: Initial Exhibits; Conference w/ Attorney Abrams re: same	0.20
02/06/20	PL	Exchange emails w/ Opposing Counsel and Conference w/ Attorney Abrams re: Extending deadlines to allow for Opposing Counsel to complete her Exhibit list prior to us submitting ours and related matters; Update calendar accordingly; Email to Court re: New deadlines, per Attorney Abrams' instructions;	0.20
02/07/20	AT	Review, modify, and then approve PreTrial Memorandum and begin draft of Trial Brief	2.60
	PL	Conferences w/ Attorney Abrams re: Discuss case related matters; Work on Client's Financial Disclosure Form;	1.70

February 15, 2020
Statement # 31925
Page # 2

		Conference w/ Attorney Abrams re: same; Finalize the Pre-Trial Memorandum, per Attorney Abrams' instructions; Email to Client re: same; Review Opposing Counsel's billing statements; Conference w/ Attorney Abrams re: same	
02/09/20	AT	Meet with Client to prepare for trial	3.10
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Begin set up of Trial Exhibit and Witness List	0.30
02/10/20	AT	Finish reviewing trial exhibits from Opposing Counsel and instructions to Paralegal Stolz re: Exhibits; [REDACTED]	3.80
		Conference w/ Paralegal Stolz re: case related matters including Financial Disclosure Form and witnesses; Text message to Client and telephone conference with Client re: [REDACTED]	
		[REDACTED] Numerous conferences with Paralegal Stolz re: finalizing exhibits, Opposing Counsel's Motion for Judicial Notice, and other case related matters	
	PL	Conferences w/ Attorney Abrams re: Discuss case related matters and Trial preparation; Complete Trial Exhibit notebooks and list of exhibits and witnesses; Draft Receipt of Copy for same; Instructions to Legal Secretary re: same; Conference w/ Attorney Abrams re: Discuss case related matters in preparation for Trial; Email to Opposing Counsel re: Request status of Client's deposition transcript	3.30
02/11/20	AT	Conference w/ Paralegal Stolz re: [REDACTED]	0.40
	PL	Conference w/ Attorney Abrams re: [REDACTED]	0.70
02/12/20	AT	Receive text message from and telephone conference to Client re: [REDACTED] Meeting at Opposing Counsel's office re: Pretrial review of Exhibits and witnesses; Telephone Conference to Client re: [REDACTED]	4.00

February 15, 2020
Statement # 31925
Page # 3

Conference w/ Paralegal Stolz re: case related matters;
Telephone Conference from Client re: case related matters;
Communications with Opposing Counsel re: Potential for
settlement; Review Justice Court transcript and note relevant
portions

PL [REDACTED] Conference w/ Attorney Abrams 0.60
re: same; Conference w/ Attorney Abrams re: Discuss case
related matters, [REDACTED]
[REDACTED] Exchange emails w/ Client re: [REDACTED]
[REDACTED] Draft Notice of
Non-Opposition to Request to Take Judicial Notice, for Attorney
Abrams' review

02/13/20 AT [REDACTED] Work on cross 4.00
examination; Meet with Client re: [REDACTED]
[REDACTED]

PL Conference w/ Attorney Abrams re: [REDACTED] 3.30
[REDACTED]; Email to Client re: same; Follow up email to
Opposing Counsel's office requesting information regarding
Client's deposition transcript; Draft Supplemental Exhibit in
Support of Non-Opposition and Certificate of Service, for
Attorney Abrams' review; Instructions to Legal Secretary re:
same; Assist Attorney Abrams with Trial preparation; [REDACTED]
[REDACTED]
[REDACTED] Prepare documents and file for tomorrow's Trial

02/14/20 AT Represent Client at Day 1 of trial 9.50
PL Prepare for and attend Trial day one; Conference w/ Attorney 9.50
Abrams following Trial discuss strategy for day two

02/15/20 AT Review notes from yesterday's trial; Prepare outlines for opening 6.00
statement, direct examination of Client, direct examination of
Semonian, examination of Evans, and cross examination of
Pickens; [REDACTED] (actual time in
excess of 7.0 hours)

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February 15, 2020
Statement # 31925
Page # 4

Total of	34.40	AT	Attorney Abrams'	Hours @	\$500.00	=	\$17,200.00
Total of	20.30	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$3,552.50
					Total for Services		\$20,752.50

Case Costs

Special Process Service - Invoice Copy Attached	\$45.00	
Courier Service	\$15.00	
E-Filing Fee	\$3.50	
E-Filing Fee	\$3.50	
E-Filing Fee	\$3.50	
E-Filing Fee	\$3.50	
	Total for Costs	\$74.00

Total Fees and Costs on This Statement	\$20,826.50
Payments from Trust Account on This Statement	- \$5,000.00

Unpaid Accounts Receivable Balance as of This Statement	\$15,826.50
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Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$5,000.00

<u>TOTAL BALANCE DUE NOW</u>	<u>\$20,826.50</u>
-------------------------------------	---------------------------

Recent Activity in Trust Account

Balance Forward

	\$5,000.00	
02/15/20 Payment for invoice: 31925		\$5,000.00
Your remaining Trust Account Balance is	\$0.00	

AA08132

NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3,
Las Vegas, NV89102
PH (702) 669-7378
Federal Tax ID: 46-0745697
NEVADA STATE LIC#1361
www.nowservicelv.com

Invoice #: 33122
Date: 02/04/2020

COPY

INVOICE FOR SERVICE:

Amount Due: \$45.00

The Abrams Law Firm, LLC
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV89118

Phone number: 702-222-4021
Fax number: 702-248-9750
Email
Address: sstolz@theabramslawfirm.com

Requestor: Chantel
Your File#

Service #34758: SHANNON L. EVANS
Manner of Service: SUITABLEBUS
Person Served: Kanois L. Schnell

Service Date/Time: 02/03/2020 4:31 PM
Service address: 2400 S. Cimarron Rd. Suite 140 Las Vegas NV89117
Served by: Mike Nettles

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Light Brown	50's	5'05	150
Other Features:					

DISTRICT COURT - FAMILY DIVISION - CLARK COUNTY,
NEVADA
THOMAS A. PICKENS v. DANKA K. MICHAELS
Service Notes

CASE#: D-17-560737

Service Documents: TRIAL SUBPOENA; \$25.00 CHECK

Service Comments:

01/31/2020 11:42	2400 S. Cimarron Rd. Suite 140 Las Vegas, NV 89117	The doors are locked and the lights are off. The hours posted say that they are closed on Friday. (Attempt made by Craig Burton)	
Standard Service	2400 S. Cimarron Rd. Suite 140 Las Vegas NV 89117		\$45.00
TOTAL CHARGES:			\$45.00
BALANCE:			\$45.00



The
ABRAMS & MAYO
Law Firm

Dr. Danka Michaels
9517 Queen Charlotte Drive
Las Vegas, Nevada 89145

Jennifer V. Abrams, Esq.
Vincent Mayo, Esq.

6252 South Rainbow Blvd.
Suite 100
Las Vegas, Nevada 89118
Telephone (702) 222-4021
Facsimile (702) 248-9750

February 29, 2020
Statement # 32021
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
02/16/20	AT	Continue drafting Trial Brief; Meet with Client re: [REDACTED]	6.50
02/17/20	AT	Continue working on Trial Brief	2.60
	PL	Email to Client re: [REDACTED] (0.2 at no charge)	0.00
02/18/20	AT	Telephone Conference to Robert Semonian re: Confirm Friday's appearance and related matters; Telephone conference with Opposing Counsel re: "Confidentiality"; Continue preparation for trial	1.40
	PL	Work on Trial Brief, per Attorney Abrams' instructions; Conference w/ Attorney Abrams re: Discuss case related matters	0.50
02/19/20	AT	Continue trial preparation including review of notes and addition of examination questions	2.20
02/20/20	AT	Prepare for and meet with Client re: [REDACTED]	4.80
	PL	Compare Opposing Party's spreadsheet that he created for the Lowe's house mortgage payments to bank statements and notate discrepancies therein; Conference w/ Attorney Abrams re: same; Obtain Court Minutes from day one of Trial; Update Client's file accordingly; Conference w/ Attorney Abrams re: same; Meeting w/ Attorney Abrams and Client re: Discuss Trial preparation and case related matters; Draft Notice of Intent to Appear by Communication Equipment and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same; Assist Attorney Abrams with preparation for tomorrow's Trial	1.60

The
ABRAMS & MAYO

Law Firm

February 29, 2020
Statement # 32021
Page # 2

02/21/20	AT	Prepare for and represent Client on Day II of trial; Matter concluded early; Conference w/ Paralegal Stolz re: case related matters	5.80
	PL	Attendance at Court re: Trial day two	6.00
	PL3	Multiple conferences with Attorney Abrams and Paralegal Stolz during trial [REDACTED]	1.10
		[REDACTED] Review and revise Trial Brief accordingly; [REDACTED]	

02/24/20	PL	[REDACTED]	0.30
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02/25/20	PL	Exchange emails w/ Court and Opposing Counsel re: Request to reset Trial date; Conference w/ Attorney Abrams today and on February 26th re: same and discuss related matters	0.20
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02/29/20	AT	Exchange communications with Client re: [REDACTED] Telephone Conference to Client re: [REDACTED]	0.40
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Total of	23.70	AT	Attorney Abrams'	Hours @	\$500.00	=	\$11,850.00
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Total of	8.60	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$1,505.00
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Total of	1.10	PL3	Paralegal D. Schoen's	Hours @	\$175.00	=	\$192.50
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Total for Services	\$13,547.50
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Case Costs

Special Courier Service - Invoice Copy Attached	\$35.00
Special Courier Service - Invoice Copy Attached	\$55.00
Court Reporting Service (Invoice Copy Attached)	\$840.00
E-Filing Fee	\$3.50

AA08135

The
ABRAMS & MAYO

Law Firm

February 29, 2020
Statement # 32021
Page # 3

	Total for Costs	\$933.50
Balance from Last Statement Before any Payments		\$15,826.50
Total Fees and Costs on This Statement		\$14,481.00
Unpaid Accounts Receivable Balance as of This Statement		\$30,307.50
Your required minimum Trust Account Balance at this time is	\$5,000.00	
Therefore, please include the following amount in your next payment		\$5,000.00
	<u>TOTAL BALANCE DUE NOW</u>	<u>\$35,307.50</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00

NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3,
Las Vegas, NV89102
PH (702) 669-7378
Federal Tax ID: 46-0745697
NEVADA STATE LIC#1361
www.nowservicelv.com

Invoice #: 33286
Date: 02/11/2020

COPY

INVOICE FOR SERVICE:

Amount Due: \$35.00

**The Abrams Law Firm, LLC
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV89118**

Phone number: 702-222-4021
Fax number: 702-248-9750
Email Address: sstolz@theabramslawfirm.com

Requestor: Chantel
Your File# Michaels

Service #35187: COURIER/MESSENGER JOB
Manner of Service:
Person Served: Delivery

Service Date/Time: 02/10/2020 4:20 PM
Service address: Family Court, 601 N. Pecos Rd. Las Vegas NV
Served by:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Other Features:					

CASE#:

Service Documents:

Service Comments: Received from Abrams and Mayo on an unsheduled basis 2/10/20 3:05pm; Delivered 1 box with 3 Trial Binders to Dept.I at Family Court, 601 N. Pecos Rd., Las Vegas, NV on a RUSH basis 2/10/20 4:20pm

Delivery	Family Court	\$18.00
RUSH Messenger		\$12.00
Other	1 Box at \$5.00 per Box	\$5.00

TOTAL CHARGES: **\$35.00**

BALANCE: **\$35.00**

NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3,
Las Vegas, NV89102
PH (702) 669-7378
Federal Tax ID: 46-0745697
NEVADA STATE LIC#1361
www.nowservicelv.com

Invoice #: 33285
Date: 02/11/2020

COPY

INVOICE FOR SERVICE:

**The Abrams Law Firm, LLC
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV89118**

Amount Due: \$55.00

Phone number: 702-222-4021
Fax number: 702-248-9750
Email
Address: sstolz@theabramslawfirm.com

Requestor: Chantel
Your File# Michaels

Service #35186: COURIER/MESSENGER JOB
Manner of Service:
Person Served: ROCed

Service Date/Time: 02/10/2020 3:23 PM
Service address: Black and Lobello 10777 W. Twain Ave. #300 Las
Vegas NV89135
Served by:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Other Features:					

CASE#:

Service Documents:

Service Comments: Received from the Abrams and Mayo Law Firm on an unsheduled basis 2/10/20 3:05pm; Delivered Trial Exhibit Notebook to Black and Lobello 10777 W. Twain Ave. #300, Las Vegas, NV 89135 and had R.O.C. signed on a Rush basis 2/10/20 3:23pm

UPU- unscheduled/special pick up from client		\$17.00
Delivery	Black and Lobello 10777 W. Twain Ave. #300, Las Vegas, NV 89135	\$26.00
RUSH Messenger		\$12.00
TOTAL CHARGES:		\$55.00
BALANCE:		\$55.00



The
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Suite 100
Las Vegas, Nevada 89118
Telephone (702) 222-4021
Facsimile (702) 248-9750

March 15, 2020

Statement # 32056

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/03/20	PL	Exchange emails w/ Client yesterday and today re: [REDACTED] [REDACTED] Conferences w/ Attorney Abrams re: same	0.20
03/07/20	AT	[REDACTED] Text message to Opposing Counsel re: Mediation	1.60
03/08/20	AT	Email to Department re: Mediation and trial dates	0.20
03/10/20	AT	Exchange emails re: Trial dates	0.20
	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Receive email from Court re: Availability for rescheduling Trial; Compare same to Attorney Abrams' schedule; Exchange emails w/ Client re: same; Email to Court re: Attorney Abrams and Client's availability for Trial; Conference w/ Attorney Abrams re: same and discuss related matters	0.20
03/11/20	PL	Receive email from Court re: New Trial date and time; Instructions to Legal Secretary re: same	0.20
Total of	2.00 AT	Attorney Abrams'	Hours @ \$500.00 = \$1,000.00
Total of	0.60 PL	Paralegal Stolz's	Hours @ \$175.00 = \$105.00
			Total for Services \$1,105.00
Balance from Last Statement Before any Payments			\$30,307.50
Payments From Trust Account On and/or Since Last Statement			- \$7,000.00
Total Fees and Costs on This Statement			\$1,105.00

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March 15, 2020
Statement # 32056
Page # 2

Unpaid Accounts Receivable Balance as of This Statement	\$24,412.50
Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>	<u>\$29,412.50</u>

Recent Activity in Trust Account	Balance Forward	
03/10/20 Payment by Credit Card on File - Thank You.	\$7,000.00	
Payment on A/R Balance - Thank You.		\$7,000.00
Your remaining Trust Account Balance is	\$0.00	



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March 31, 2020

Statement # 32159

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/16/20	PL	Obtain the Court Minutes from the February 21st Trial date; Update Client's file; Conference w/ Attorney Abrams re: same; Receive email from Attorney Dickerson re: Dates for coordinating mediation; Email to Client re: same	0.20
03/17/20	PL	Exchange emails w/ Attorney Dickerson re: Status; Follow up email to Client re: same and discuss related matters; Receive email from Attorney Dickerson on March 18th with conflict letter; Email to Client re: same and Conference w/ Attorney Abrams re: same (Combined entry)	0.20
03/19/20	AT	Receive and review correspondence from Bob Dickerson; Conference w/ Paralegal Stolz re: same	0.20
	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED]; Receive, review, and reply to email from Court re: Confirmation of next Trial date and time	0.20
03/20/20	PL	Receive, review, and reply to email from Client re: Confirm proposed date works for Client for mediation; Exchange emails w/ Mediator and Opposing Counsel re: same; Update calendar accordingly	0.20
03/24/20	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED] Exchange emails w/ Attorney Dickerson and his office re: I provided signed conflict letter and they provided engagement letter; Calendar Brief deadline	0.20
03/31/20	AT	Numerous communications with Paralegal Stolz between 3/16 and today (No Charge)	0.00
	PL	Exchange emails w/ Client re: [REDACTED] [REDACTED]	0.20

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March 31, 2020
Statement # 32159
Page # 2

[REDACTED] Conference w/
Attorney Abrams re: same

Total of	0.20	AT	Attorney Abrams'	Hours @	\$500.00	=	\$100.00
Total of	1.20	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$210.00
Total for Services							\$310.00
Balance from Last Statement Before any Payments							\$24,412.50
Payments From Trust Account On and/or Since Last Statement							- \$8,000.00
Total Fees and Costs on This Statement							\$310.00
Unpaid Accounts Receivable Balance as of This Statement							\$16,722.50
Your required minimum Trust Account Balance at this time is							\$5,000.00
Therefore, please include the following amount in your next payment							\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>							<u>\$21,722.50</u>

Recent Activity in Trust Account		Balance Forward	
03/24/20	Payment by Credit Card on File - Thank You.	\$3,000.00	
	Payment on A/R Balance - Thank You.		\$3,000.00
03/31/20	Payment by Credit Card on File - Thank You.	\$5,000.00	
	Payment on A/R Balance - Thank You.		\$5,000.00
Your remaining Trust Account Balance is		\$0.00	

AA08142



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April 15, 2020
Statement # 32198
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
04/06/20	AT	Receive, review, and reply to email from Client re: [REDACTED]	0.20
	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
04/13/20	PL	Receive email from Opposing Counsel's office re: Conflict letter signed by Opposing Party; Email to Client re: same; Instructions to Legal Secretary re: same (0.2 at no charge)	0.00
Total of	0.20 AT	Attorney Abrams'	Hours @ \$500.00 = \$100.00
Total of	0.20 PL	Paralegal Stolz's	Hours @ \$175.00 = \$35.00
Total for Services			\$135.00
Balance from Last Statement Before any Payments			\$16,722.50
Total Fees and Costs on This Statement			\$135.00
Unpaid Accounts Receivable Balance as of This Statement			\$16,857.50
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$21,857.50</u>

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April 15, 2020

Statement # 32198

Page # 2

Recent Activity in Trust Account

Balance Forward

Your remaining Trust Account Balance is

\$0.00



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April 30, 2020
Statement # 32261
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
04/16/20	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters	0.20
04/21/20	PL	Conferences w/ Attorney Abrams yesterday and today re: [REDACTED] [REDACTED] (Combined entry)	0.20
04/22/20	AT	Conferences with Paralegal Stolz on 4/20, 4/21, and today re: case related matters	0.20
	PL	Draft email for Attorney Abrams to review, modify and send to Opposing Counsel requesting that Opposing Party sign an Authorization for the Release of his employment information and to continue mediation and Trial	0.20
04/24/20	PL	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED]	0.20
04/27/20	AT	Email to Opposing Counsel re: Request for Authorization for release of employment records	0.20
04/30/20	PL	Exchange several emails w/ Client on April 28th and today re: [REDACTED] [REDACTED] [REDACTED] Conferences w/ Attorney Abrams re: same (Combined entry)	0.40
Total of	0.60 AT	Attorney Abrams'	Hours @ \$500.00 = \$300.00
Total of	1.20 PL	Paralegal Stolz's	Hours @ \$175.00 = \$210.00
		Total for Services	\$510.00

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April 30, 2020
Statement # 32261
Page # 2

Case Costs			
Filing Fee	\$200.00		
	Total for Costs		\$200.00
Balance from Last Statement Before any Payments			\$16,857.50
Total Fees and Costs on This Statement			\$710.00
Unpaid Accounts Receivable Balance as of This Statement			\$17,567.50
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$22,567.50</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



**EIGHTH JUDICIAL DISTRICT COURT
CLERK OF THE COURT
FAMILY DIVISION**
FAMILY COURT & SERVICES CENTER
601 N. PECOS ROAD
LAS VEGAS, NEVADA 89101

Steven D. Grierson
Clerk of the Court

Kristina O'Conner
Court Division Administrator

REQUEST FOR FEES

TO:

Jennifer V Abrams
6252 South Rainbow Blvd Suite 100
Las Vegas NV 89118

Notice Date:

August 01, 2019

Case Number:

D-17-560737-D

Caption:

Thomas A. Pickens, Plaintiff

vs.

Danka K. Michaels, Defendant.

Type/Action:

Divorce - Complaint

In the above mentioned case it has been discovered that on 08/01/2019 when the reviewer accepted the Motion for Summary Judgment, there was a filing fee balance left outstanding.

Filing Fee Due:	\$	200.00
Amount Paid:	\$	0
Balance Due:	\$	200.00

Please remit the balance due as soon as possible. We will accept a Visa or MasterCard payment over the phone at (702) 455-2343 or you may send a check or money order to: **Clerk of the Court, 601 N Pecos Rd., Las Vegas, NV 89101, Attn: Finance Department.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Carmelo Coscolluela
Family Clerk of the Court Office

AA08147



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May 15, 2020

Statement # 32352

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
05/01/20	AT	Email to Opposing Counsel re: Authorization for employment information; Exchange communications with Paralegal Stolz and Client re: case related matters	0.20
	PL	Conference w/ Attorney Abrams re: Discuss case status and case related matters; [REDACTED]	0.40
05/05/20	AT	Numerous email exchanges with Opposing Counsel re: Mediation date and authorization for the release of employment records	0.30
	PL	Draft Authorization for the Release of Records for Opposing Party's employment information, for Attorney Abrams' review; Conference w/ Attorney Abrams re: Discuss case related matters	0.40
05/13/20	AT	Telephone Conference to Opposing Counsel re: Continuing trial date; Review, modify, and then approve Stipulation and Order to Continue and Conference w/ Paralegal Stolz re: same	0.30
	PL	Draft Stipulation and Order to Continue Trial Day 3, for Attorney Abrams' review; Email to Opposing Counsel re: Attached proposed Stipulation and Order, for review, approval and signature	0.50
Total of	0.80 AT	Attorney Abrams'	Hours @ \$500.00 = \$400.00
Total of	1.30 PL	Paralegal Stolz's	Hours @ \$175.00 = \$227.50
			Total for Services \$627.50
Balance from Last Statement Before any Payments			\$17,567.50

May 15, 2020
Statement # 32352
Page # 2

Total Fees and Costs on This Statement	\$627.50
Unpaid Accounts Receivable Balance as of This Statement	\$18,195.00
Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>	<u>\$23,195.00</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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June 30, 2020
Statement # 32560
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
06/16/20	PL	Begin draft / set up of Confidential Settlement Conference Brief, for Attorney Abrams to review and edit	0.40
06/17/20	AT	Review, modify, and then approve Mediation Brief; Conference w/ Paralegal Stolz re: same	1.00
	PL	Email to Client re: Attached Confidential Settlement Conference Brief, for review and approval	0.20
06/19/20	AT	[REDACTED]	0.20
06/20/20	AT	Receive, review, and reply to email from Opposing Counsel re: Good faith at upcoming mediation	0.20
06/22/20	PL	Conferences w/ Attorney Abrams on June 19th, 20th and today re: Discuss Client's requested changes to the Settlement Conference Brief, as well as additional edits, and related matters; Modify the Settlement Conference Brief accordingly, for Attorney Abrams' review; Exchange communications w/ Avece M. Higbee, Esq.'s assistant re: She requested and I provided information for this week's settlement conference; Conference w/ Attorney Abrams re: same	0.50
06/23/20	AT	Review, modify, and then approve revised Mediation Brief; Receive, review, and reply to email from Mediator Dickerson re: Thursday's mediation and potential rescheduling	0.30
	PL	Finalize Settlement Conference Brief and exhibits, per Attorney Abrams' instructions; Email to Client re: Attached final Brief that will be submitted; Serve same upon the mediator	0.30
06/24/20	PL	Exchange emails w/ Client and Mediator yesterday and today re: Possibility of moving mediation pending the mediator's Covid test results; Conferences w/ Attorney	0.40

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June 30, 2020

Statement # 32560

Page # 2

Abrams re: same; Draft Notice of Entry of Stipulation and Order to Continue Trial, Day 3 and Certificate of Service, for Attorney Abrams' review; Instructions to Legal Secretary re: same

06/25/20	PL	Exchange emails w/ Client, Attorney Higbee's office and mediator re: New mediation date and time; Conference w/ Attorney Abrams re: same	0.20
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Total of	1.70	AT	Attorney Abrams'	Hours @	\$500.00	=	\$850.00
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Total of	2.00	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$350.00
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Total for Services	\$1,200.00
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Case Costs

E-Filing Fee

\$3.50

Total for Costs	\$3.50
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Balance from Last Statement Before any Payments	\$13,470.00
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Payments From Trust Account On and/or Since Last Statement	- \$13,470.00
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Total Fees and Costs on This Statement	\$1,203.50
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Unpaid Accounts Receivable Balance as of This Statement	\$1,203.50
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Your required minimum Trust Account Balance at this time is	\$5,000.00
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Therefore, please include the following amount in your next payment	\$5,000.00
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<u>TOTAL BALANCE DUE NOW</u>	<u>\$6,203.50</u>
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Recent Activity in Trust Account

Balance Forward

06/29/20 Payment by Credit Card on File - Thank You.

\$13,470.00

Payment on A/R Balance - Thank You.

\$13,470.00

Your remaining Trust Account Balance is

\$0.00

AA08151



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July 31, 2020

Statement # 32692

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
07/16/20	AT	Conference w/ Paralegal Stolz and prepare for tomorrow's mediation	0.30
	PL	Conference w/ Attorney Abrams re: Preparation for tomorrow's mediation; Receive, review, and reply to email from Court re: Client and Attorney Abrams' email addresses for serving Bluejeans invites; Email to Client re: same	0.20
07/17/20	AT	[REDACTED] Represent Client during mediation via Zoom	3.00
	PL	Prepare for and participate in mediation	3.50
07/20/20	AT	Prepare for and represent Client at status check; Conference w/ Paralegal Stolz re: case related matters	0.50
	PL	Conference w/ Attorney Abrams re: Discuss case related matters	0.20
07/24/20	AT	[REDACTED]	0.20
	PL	[REDACTED]	0.20
07/27/20	PL	Obtain the Court Minutes from the July 20th hearing; Update Client's file accordingly; Conference w/ Attorney Abrams re: same; [REDACTED]	0.20
Total of	4.00 AT	Attorney Abrams' Hours @	\$500.00 = \$2,000.00

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July 31, 2020
Statement # 32692
Page # 2

Total of	4.30	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$752.50
					Total for Services		\$2,752.50
			Balance from Last Statement Before any Payments				\$1,413.50
			Total Fees and Costs on This Statement				\$2,752.50
			Unpaid Accounts Receivable Balance as of This Statement				\$4,166.00
			Your required minimum Trust Account Balance at this time is		\$5,000.00		
			Therefore, please include the following amount in your next payment				\$5,000.00
					<u>TOTAL BALANCE DUE NOW</u>		<u>\$9,166.00</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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August 15, 2020
Statement # 32733
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/03/20	PL	[REDACTED]	0.30
Total of 0.30 PL Paralegal Stolz's Hours @ \$175.00 =			\$52.50
Total for Services			\$52.50
Balance from Last Statement Before any Payments			\$4,166.00
Total Fees and Costs on This Statement			\$52.50
Unpaid Accounts Receivable Balance as of This Statement			\$4,218.50
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$9,218.50</u>

Recent Activity in Trust Account

Your remaining Trust Account Balance is

Balance Forward

\$0.00



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August 31, 2020
Statement # 32799
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/17/20	AT	Receive and review email from Court re: Scheduling; Conference w/ Paralegal Stolz re: same and related matters	0.20
	PL	Exchange emails w/ Court, Client and Attorney Higbee re: Court's availability for rescheduling Trial; Conference w/ Attorney Abrams re: same	0.20
08/18/20	PL	Exchange emails w/ Client and Attorney Higbee re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
08/19/20	PL	Exchange emails w/ Court re: Attorney Higbee is not available and request for different dates and related matters	0.20
08/20/20	AT	Telephone conference with Attorney Higby re: case related matters; Communications with Paralegal Stolz re: case related matters	0.80
	PL	Receive email from Court with alternative proposed dates for Trial day three; Email to Client re: same and Conference w/ Attorney Abrams re: same	0.20
08/21/20	AT	Receive and review email from Department re: Scheduling; Receive and review email from and telephone conference from Attorney Higbee re: She will not finish trial; Email to department re: same and continuance to early next year	0.30
08/25/20	AT	[REDACTED]	1.50
08/26/20	AT	Conference w/ Paralegal Stolz re: case related matters	0.20
	PL	Conferences w/ Attorney Abrams yesterday and today re: Case related matters, including, upcoming Trial date and	0.30

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August 31, 2020
Statement # 32799
Page # 2

		next steps; Receive email from Court re: Confirmation of next Trial date: Email to Client re: same			
08/27/20	AT	Telephone conference with Michael Maupin at Marquis & Aurbach re: [REDACTED]		0.60	
Total of	3.60	AT	Attorney Abrams'	Hours @ \$500.00	= \$1,800.00
Total of	1.10	PL	Paralegal Stolz's	Hours @ \$175.00	= \$192.50
				Total for Services	\$1,992.50
Balance from Last Statement Before any Payments					\$4,218.50
Total Fees and Costs on This Statement					\$1,992.50
Unpaid Accounts Receivable Balance as of This Statement					\$6,211.00
Your required minimum Trust Account Balance at this time is				\$5,000.00	
Therefore, please include the following amount in your next payment					\$5,000.00
				<u>TOTAL BALANCE DUE NOW</u>	<u>\$11,211.00</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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September 15, 2020

Statement # 32874

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/01/20	PL	Receive, review, and reply to email from Attorney Maupin re: [REDACTED] [REDACTED]	0.20
09/04/20	PL	Exchange communications w/ Client [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same (Combined entry)	0.20
09/09/20	PL	Exchange emails w/ Attorney Maupin's office re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same; Exchange several communications w/ Client and Attorney Goldstein re: [REDACTED] Conference w/ Attorney Abrams re: same	0.40
09/13/20	PL	Exchange emails w/ Client and Attorney Goldstein re: [REDACTED] [REDACTED] Conference w/ Attorney Abrams re: same	0.20
Total of	1.00 PL	Paralegal Stolz's	Hours @ \$175.00 = \$175.00
			Total for Services \$175.00
Balance from Last Statement Before any Payments			\$6,211.00
Total Fees and Costs on This Statement			\$175.00
Unpaid Accounts Receivable Balance as of This Statement			\$6,386.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00

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September 15, 2020
Statement # 32874
Page # 2

TOTAL BALANCE DUE NOW **\$11,386.00**

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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September 30, 2020

Statement # 32948

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
09/17/20	AT	Prepare for and Zoom conference with Client and Attorney Goldstein re: [REDACTED]	1.10
	PL	Conferences w/ Attorney Abrams re: Discuss case status and case related matters; Exchange communications w/ Attorney Goldstein's office re: [REDACTED]	0.40
09/29/20	PL	Exchange emails w/ Client, Attorney Goldstein and his assistant yesterday and today re: [REDACTED]; Conference w/ Attorney Abrams re: same (Combined entry)	0.20
Total of	1.10 AT	Attorney Abrams' Hours @	\$500.00 = \$550.00
Total of	0.60 PL	Paralegal Stolz's Hours @	\$175.00 = \$105.00
Total for Services			\$655.00
Balance from Last Statement Before any Payments			\$6,386.00
Total Fees and Costs on This Statement			\$655.00
Unpaid Accounts Receivable Balance as of This Statement			\$7,041.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00

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September 30, 2020
Statement # 32948
Page # 2

TOTAL BALANCE DUE NOW **\$12,041.00**

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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October 15, 2020
Statement # 33022
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
10/01/20	AT	Zoom meeting with Attorney Goldstein and Paralegal Stolz re: Trial issues and strategy	2.40
	PL	Zoom conference with Attorney Abrams and Attorney Goldstein to discuss case	2.40
10/02/20	AT	Zoom conference with Client, Paralegal Stolz, and Attorney Goldstein re: Preparation for Trial	1.20
	PL	Zoom conference with Client, Attorney Abrams and Attorney Goldstein discussing Trial, Trial preparation and strategy	1.20
10/07/20	PL	Exchange several communications with Attorney Goldstein re: He requested and I provided documentation and information; Conference w/ Attorney Abrams re: same	0.60
10/13/20	AT	Telephone Conference to Attorney Goldstein re: [REDACTED]	0.50
10/14/20	PL	Conference w/ Paralegal DiCiero re: Legal research; Email to Attorney Goldstein re: [REDACTED]	0.20
10/15/20	PL	Exchange communications w/ Court re: Court inquired and notified the Court that Attorney Goldstein will be physically present at Trial; Conference w/ Attorney Abrams re: same; Exchange emails w/ Attorney Goldstein re: Filing Notice of Association / Co-Counsel	0.30
	PL5	Conference with Paralegal Stolz Re: Trial Brief and Additional Research for Brief; [REDACTED]	2.50

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October 15, 2020
Statement # 33022
Page # 2

Total of	4.10	AT	Attorney Abrams'	Hours @	\$500.00	=	\$2,050.00
Total of	4.70	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$822.50
Total of	2.50	PL5	Paralegal DiCiero's	Hours @	\$195.00	=	\$487.50
Total for Services							\$3,360.00

Case Costs

Special Courier Service - Invoice Copy Attached	\$80.00	
CREDIT	-\$2,500.00	
Total for Costs		-\$2,420.00

Balance from Last Statement Before any Payments	\$7,041.00
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Total Fees and Costs on This Statement	\$940.00
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Unpaid Accounts Receivable Balance as of This Statement	\$7,981.00
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Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment	\$5,000.00
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<u>TOTAL BALANCE DUE NOW</u>	<u>\$12,981.00</u>
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Recent Activity in Trust Account

Balance Forward

Your remaining Trust Account Balance is	\$0.00
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AA08162

NOW! Services, Inc.
3210 W. Charleston Blvd., Ste. 3,
Las Vegas, NV89102
PH (702) 669-7378
Federal Tax ID: 46-0745697
NEVADA STATE LIC#1361
www.nowservicelv.com

Invoice #: 36206
Date: 10/08/2020

COPY

INVOICE FOR SERVICE:

**The Abrams and Mayo Law Firm
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV89118**

Requestor: Chantel
Your File# Michaels

Service #37915: COURIER/MESSENGER JOB
Manner of Service:
Person Served:Delivery

Service Date/Time:10/08/202010:20 AM
Service address:Goldstein Law Ltd., 10161 Park Run Dr. Suite 150 Las
VegasNV89145
Served by:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Other Features:					

Amount Due: \$80.00

Phone number: 702-222-4021
Fax number: 702-248-9750
Email
Address:sstolz@theabramslawfirm.com

CASE#:

Service Documents:

Service Comments: Received from The Abrams and Mayo Law Firm on an unscheduled basis 10/8/20 10:00am; Delivered 5 Boxes to Shawn Goldstein at Goldstein Law Ltd., 10161 Park Run Dr. Suite 150, Las Vegas, NV 89145 on a RUSH basis 10/8/20 10:20am.

UPU- unscheduled/special pick up from client		\$17.00
Delivery	Goldstein Law Ltd., 10161 Park Run Dr. Suite 150, Las Vegas, NV 89145	\$26.00
RUSH Messenger		\$12.00
Other	5 Boxes at \$5.00 per Box	\$25.00

TOTAL CHARGES: **\$80.00**

BALANCE: **\$80.00**



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Facsimile (702) 248-9750

October 31, 2020
Statement # 33093
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
10/16/20	AT	Prepare for and Zoom conference with Attorney Goldstein, Paralegal Stolz and Client re: case related matters; Review research memorandum from Paralegal DiCiero and email to Attorney Goldstein re: same	1.50
	PL	Zoom conference with Attorney Abrams, Attorney Goldstein and Client to discuss upcoming Trial, strategy and related matters	1.00
	PL5	Conference with Paralegal Stolz Re: Initial Findings; Continue LexisNexis Research; Revise, Add, and Conclude Research Memorandum for Attorney Abrams	2.50
10/19/20	AT	Prepare cross-examination outline per Attorney Goldstein's request; Research and complete section of 7.27 brief [REDACTED]; Review research memo from Paralegal DiCiero [REDACTED]	3.50
10/20/20	AT	Zoom conference with Attorneys Goldstein and Higbee re: Case related matters	0.90
10/22/20	PL	Exchange communications w/ Attorney Goldstein and Court on October 20th and today re: Continuation of Trial, day 3, new date and time and related matters; Update calendar accordingly (Combined entry)	0.20
Total of	5.90 AT	Attorney Abrams'	Hours @ \$500.00 = \$2,950.00
Total of	1.20 PL	Paralegal Stolz's	Hours @ \$175.00 = \$210.00
Total of	2.50 PL5	Paralegal DiCiero's	Hours @ \$195.00 = \$487.50
			Total for Services \$3,647.50
Balance from Last Statement Before any Payments			\$7,981.00

October 31, 2020
Statement # 33093
Page # 2

Total Fees and Costs on This Statement	\$3,647.50
Unpaid Accounts Receivable Balance as of This Statement	\$11,628.50
Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>	<u>\$16,628.50</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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November 15, 2020
Statement # 33164
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/09/20	PL	Exchange communications w/ Attorney Goldstein and his office on November 2nd and 9th re: Setting tentative meeting with Attorney Abrams for November 13th; Conference w/ Attorney Abrams re: same (0.2 at no charge)	0.00
11/13/20	AT	Telephone conference from Attorney Goldstein re: [REDACTED]	1.20
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Exchange emails w/ Attorney Goldstein re: Case related matters	0.20
11/14/20	AT	[REDACTED] Continue working on Trial Brief; Memo to Paralegal Stolz and email to Attorney Goldstein re: same	3.40
Total of	4.60 AT	Attorney Abrams' Hours @	\$500.00 = \$2,300.00
Total of	0.20 PL	Paralegal Stolz's Hours @	\$175.00 = \$35.00
Total for Services			\$2,335.00
Balance from Last Statement Before any Payments			\$11,628.50
Total Fees and Costs on This Statement			\$2,335.00
Unpaid Accounts Receivable Balance as of This Statement			\$13,963.50
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$5,000.00

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November 15, 2020
Statement # 33164
Page # 2

TOTAL BALANCE DUE NOW **\$18,963.50**

Recent Activity in Trust Account

Balance Forward

Your remaining Trust Account Balance is

\$0.00



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November 30, 2020
Statement # 33266
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
11/16/20	AT	Continue working on edits to Trial Brief; Conference w/ Paralegal Stolz re: same	0.60
	PL	Receive, review, and reply to email from Attorney Maupin re: [REDACTED] [REDACTED] Review, modify and finalize the EDCR 7.27 Brief; Conferences w/ Attorney Abrams re: same; Email to Client and Attorney Goldstein re: Attached Brief, for review and approval, and request for Attorney Goldstein's Brunzell factors for same	3.20
11/17/20	PL	Exchange communications w/ Attorney Goldstein's office and Court re: Need to continue tomorrow's Trial (0.2 at no charge)	0.00
11/18/20	AT	Conferences with Paralegal Stolz and Attorney Goldstein re: case related matters (No Charge)	0.00
	PL	Conference w/ Attorney Abrams and Attorney Goldstein re: Case related matters	0.20
11/23/20	AT	Telephone Conference from Attorney Goldstein re: Trial Brief and other case related matters	0.30
11/24/20	AT	Receive, review, and reply to email from Attorney Goldstein re: scheduling issues	0.20
11/25/20	PL	Receive and review communications from Court re: New Trial date; Update calendar accordingly (0.2 at no charge)	0.00
Total of	1.10 AT	Attorney Abrams'	Hours @ \$500.00 = \$550.00
Total of	3.40 PL	Paralegal Stolz's	Hours @ \$175.00 = \$595.00
			Total for Services \$1,145.00
Balance from Last Statement Before any Payments			\$13,963.50

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November 30, 2020
Statement # 33266
Page # 2

Total Fees and Costs on This Statement	\$1,145.00
Unpaid Accounts Receivable Balance as of This Statement	\$15,108.50
Your required minimum Trust Account Balance at this time is	\$5,000.00
Therefore, please include the following amount in your next payment	\$5,000.00
<u>TOTAL BALANCE DUE NOW</u>	<u>\$20,108.50</u>

Recent Activity in Trust Account	Balance Forward
Your remaining Trust Account Balance is	\$0.00



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December 15, 2020
Statement # 33309
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/02/20	PL	Exchange emails w/ Attorney Goldstein re: [REDACTED]	0.20
12/09/20	PL	Receive Attorney Goldstein's Brunzell factors and make changes to the Brief, for Attorney Abrams' review; Conference w/ Attorney Abrams re: same and related matters	0.20

Total of 0.40 PL Paralegal Stolz's Hours @ \$175.00 = \$70.00
Total for Services \$70.00

Balance from Last Statement Before any Payments \$15,108.50
Payments From Trust Account On and/or Since Last Statement - \$15,108.50

Total Fees and Costs on This Statement \$70.00
Payments from Trust Account on This Statement - \$70.00

Unpaid Accounts Receivable Balance as of This Statement \$0.00

Your required minimum Trust Account Balance at this time is \$5,000.00
Therefore, please include the following amount in your next payment \$70.00

TOTAL BALANCE DUE NOW **\$70.00**

Recent Activity in Trust Account

Balance Forward

AA08170

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December 15, 2020
Statement # 33309
Page # 2

12/15/20	Check # 697402192 - Thank You.	\$20,108.50	
	Payment on A/R Balance - Thank You.		\$15,108.50
	Payment for invoice: 33309		\$70.00
Your remaining Trust Account Balance is		\$4,930.00	



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December 31, 2020
Statement # 33396
Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
12/26/20	AT	Review revisions to Trial Brief prepared by Paralegal Stolz; Proof read facts, revise for clarity, and add argument [REDACTED] [REDACTED] Email to Client and Attorney Goldstein re: same	0.80
Total of	0.80	AT Attorney Abrams'	Hours @ \$500.00 = \$400.00
Total for Services			\$400.00
Balance from Last Statement Before any Payments			\$70.00
Payments From Trust Account On and/or Since Last Statement			- \$70.00
Total Fees and Costs on This Statement			\$400.00
Payments from Trust Account on This Statement			- \$400.00
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$470.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$470.00</u>

Recent Activity in Trust Account

Balance Forward

12/31/20	Payment for invoice: 33396	\$4,930.00	\$400.00
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AA08172

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December 31, 2020

Statement # 33396

Page # 2

Your remaining Trust Account Balance is

\$4,530.00



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January 15, 2021

Statement # 33474

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/12/21	PL	Exchange emails w/ Client and Attorney Goldstein re: [REDACTED] [REDACTED]	0.20
Total of	0.20	PL Paralegal Stolz's	Hours @ \$175.00 = \$35.00
			Total for Services \$35.00
Total Fees and Costs on This Statement			\$35.00
Payments from Trust Account on This Statement			- \$35.00
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$505.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$505.00</u>

Recent Activity in Trust Account

Balance Forward

01/15/21 Payment for invoice: 33474

\$4,530.00

\$35.00

Your remaining Trust Account Balance is

\$4,495.00



The
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January 31, 2021

Statement # 33555

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
01/19/21	PL	Review emails exchanged between Attorney Goldstein and Opposing Counsel on January 18th and today re: Need to continue Trial and related matters (0.3 at no charge)	0.00
01/22/21	AT	Represent Client at Status Check hearing; Matter set for March 5 and 12; Memo to Paralegal Stolz re: same	0.30
	PL	Conference w/ Attorney Abrams and Attorney Goldstein re: New Trial date and discuss today's hearing; Receive voice mail from and telephone conference to Attorney Goldstein re: [REDACTED] Conference w/ Attorney Abrams re: same	0.20
Total of	0.30 AT	Attorney Abrams'	Hours @ \$500.00 = \$150.00
Total of	0.20 PL	Paralegal Stolz's	Hours @ \$175.00 = \$35.00
			Total for Services \$185.00
Total Fees and Costs on This Statement			\$185.00
Payments from Trust Account on This Statement			- \$185.00
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is			\$5,000.00
Therefore, please include the following amount in your next payment			\$690.00
<u>TOTAL BALANCE DUE NOW</u>			<u>\$690.00</u>

January 31, 2021
Statement # 33555
Page # 2

Recent Activity in Trust Account		Balance Forward	
		\$4,495.00	
01/31/21	Payment for invoice: 33555		\$185.00
Your remaining Trust Account Balance is		\$4,310.00	



The
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March 15, 2021

Statement # 33795

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
02/23/21	PL	Exchange communications w/ Attorney Goldstein re: Rescheduling this week's meeting to next Tuesday (0.2 at no charge)	0.00
03/01/21	AT	Conferences with Paralegal Stolz and Attorney Goldstein re: case related matters	0.50
	PL	Conference w/ Attorney Abrams and Attorney Goldstein re: Status of Brief and related matters; Telephone Conference from Attorney Goldstein re: Discuss Exhibits, Trial and case related matters; Conference w/ Attorney Abrams re: same; Review the file and record; Conferences w/ Attorney Abrams and Attorney Goldstein re: same	0.50
03/02/21	AT	Meeting with Paralegal Stolz and Attorney Goldstein re: Trial preparation	4.20
	PL	Meeting with Attorney Abrams and Attorney Goldstein re: Trial preparation; Email to Court re: Request for the Clerk's updated Exhibit List; Email to Court re: Coordinating Attorney Abrams' virtual appearance at Court	4.40
	PL5	[REDACTED]	1.60
03/03/21	AT	Conference w/ Paralegal Stolz re: case related matters (No Charge)	0.00
	PL	Receive, review, and reply to email from Court re: Bluejeans link for Attorney Abrams' virtual appearance; Receive, review, and reply to email from Court re: Clerk's updated exhibit list; Email to Attorney Goldstein re: same; Pull missing pages from Opposing Party's Exhibits 7 and 8; [REDACTED]	0.40

March 15, 2021
Statement # 33795
Page # 2

03/04/21	AT	Telephone conference with Attorney Goldstein re: Preparation for tomorrow's trial	1.10
	PL	Conferences with Attorney Abrams and Attorney Goldstein re: Case related matters; Exchange several emails with Attorney Abrams and Attorney Goldstein re: Case related matters; Prepare for Trial day three	1.00
03/05/21	AT	Prepare for and represent Client at Trial; Conferences with Paralegal Stolz and Attorney Goldstein re: Today's testimony, strategy, plan and next steps	7.20
	PL	Attendance at Court re: Trial day three; Telephone Conference with Attorney Abrams following Trial discussing same	7.50
	PL5	[REDACTED]	0.50
03/07/21	AT	Conferences with Paralegal Stolz and Attorney Goldstein re: case related matters (yesterday and today)	0.30
	PL	Conferences with Attorney Abrams and Attorney Goldstein yesterday and today re: Case related matters	0.30
03/10/21	AT	Meeting at Attorney Goldstein's office re: Preparation for trial	5.10
	PL	Attend meeting at Shawn Goldstein's office to prepare for Trial day four	5.10
03/11/21	AT	Preparation for tomorrow's trial	1.20
	PL	Prepare for tomorrow's Trial, including, working on Trial Brief and preparing documents and Exhibits for same; Obtain Court Minutes from day three of Trial; Conference w/ Attorney Abrams [REDACTED] Exchange communications w/ Attorney Abrams and Attorney Goldstein re: Preparation for Trial; Exchange emails w/ Attorney Goldstein re: Exhibits and related matters	1.50
03/12/21	AT	Prepare for and represent Client at Trial; Work on 7.27 brief; Conferences with Staff and co-counsel re: case related matters	6.80
	AT3	[REDACTED]	1.00
	PL	Attendance at Trial day four	7.00

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ABRAMS & MAYO

Law Firm

March 15, 2021
Statement # 33795
Page # 3

PL3

1.40

Total of	26.40	AT	Attorney Abrams'	Hours @	\$500.00	=	\$13,200.00
Total of	1.00	AT3	Attorney Hughes'	Hours @	\$475.00	=	\$475.00
Total of	27.70	PL	Paralegal Stolz's	Hours @	\$180.42	=	\$4,997.50
Total of	1.40	PL3	Paralegal D. Schoen's	Hours @	\$175.00	=	\$245.00
Total of	2.10	PL5	Paralegal DiCiero's	Hours @	\$195.00	=	\$409.50
Total for Services							\$19,327.00

Total Fees and Costs on This Statement **\$19,327.00**

Payments from Trust Account on This Statement **- \$5,470.00**

Unpaid Accounts Receivable Balance as of This Statement **\$13,857.00**

Your required minimum Trust Account Balance at this time is **\$5,000.00**

Therefore, please include the following amount in your next payment **\$5,000.00**

TOTAL BALANCE DUE NOW **\$18,857.00**

Recent Activity in Trust Account

Balance Forward

		\$4,310.00	
02/19/21	Check # 704717265 - Thank You.	\$690.00	
	Check # 704717314 - Thank You.	\$470.00	
03/15/21	Payment for invoice: 33795		\$5,470.00
Your remaining Trust Account Balance is		\$0.00	

AA08179



The
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March 31, 2021

Statement # 33907

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
03/25/21	AT	Communications with Attorney Goldstein re: [REDACTED] [REDACTED]	2.00
03/26/21	AT	Conference w/ Paralegal Stolz re: [REDACTED] [REDACTED] [REDACTED] Instructions to Paralegal Stolz re: Closing Argument (Friday and Saturday combined entry)	1.30
	PL	[REDACTED]	0.30
03/30/21	AT	Telephone Conference to Attorney Goldstein re: [REDACTED] [REDACTED]	0.70
03/31/21	AT	Receive, review, and reply to email from Client re: [REDACTED] [REDACTED] Conference w/ Paralegal Stolz re: Opposing Party's testimony and begin updating 7.27 Brief accordingly; Receive, review, and reply to email from Attorney Goldstein re: [REDACTED] [REDACTED]	0.50
	PL	Conference w/ Attorney Abrams re: Discuss case related matters in preparation for day five of Trial; Conference w/ Attorney Abrams and Attorney Goldstein re: Case related matters in preparation for day five of Trial	0.60

Total of 4.50 AT Attorney Abrams' Hours @ \$500.00 = \$2,250.00

AA08180

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March 31, 2021
Statement # 33907
Page # 2

Total of	0.90	PL	Paralegal Stolz's	Hours @	\$175.00	=	\$157.50
						Total for Services	\$2,407.50
Balance from Last Statement Before any Payments							\$13,857.00
Payments From Trust Account On and/or Since Last Statement						-	\$13,857.00
Total Fees and Costs on This Statement							\$2,407.50
Payments from Trust Account on This Statement						-	\$2,407.50
Unpaid Accounts Receivable Balance as of This Statement							\$0.00
Your required minimum Trust Account Balance at this time is						\$5,000.00	
Therefore, please include the following amount in your next payment							\$2,407.50
						<u>TOTAL BALANCE DUE NOW</u>	<u>\$2,407.50</u>

Recent Activity in Trust Account		Balance Forward	
03/29/21	Check # 709686137 - Thank You.	\$18,857.00	
	Payment on A/R Balance - Thank You.		\$13,857.00
03/31/21	Payment for invoice: 33907		\$2,407.50
Your remaining Trust Account Balance is		\$2,592.50	

AA08181



The
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April 15, 2021

Statement # 33969

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
04/01/21	AT	Meeting at Attorney Goldstein's office to discuss final day of trial [REDACTED]	3.00
	AT	Review, modify, and update 60 page 7.27 Brief and email to Attorney Goldstein and Client re: same; Instructions to Paralegal Stolz re: additional edits; [REDACTED]	3.00
	PL	Conference w/ Attorney Abrams re: Discuss case related matters; Review, modify and finalize EDCR 7.27 Brief, per Attorney Abrams' instructions	1.70
04/02/21	AT	Finalize revisions to 7.27 brief; Prepare for and represent Client at final day of trial; Meet with Client, Paralegal Stolz and Attorney Goldstein re: case related matters	3.00
	PL	Attendance at Court re: Trial day five; Meeting with Attorney Abrams, Attorney Goldstein and Client following today's Trial re: Next steps; Calendar upcoming deadlines	3.20
04/05/21	PL	Download all videos from the Trial dates of March 5th and 12th and order transcripts of same	0.50
04/07/21	PL	Email to Court re: Request for the updated exhibits lists from Trial; Exchange emails w/ Court re: same; Obtain the Court Minutes from the April 2nd Trial date; Update Client's file accordingly; Conference w/ Attorney Abrams and Attorney Goldstein re: same; Receive and review Exhibit lists from Court and note that Exhibit O is not marked as admitted; Exchange emails w/ Court re: same, review video record from Trial and provide Court with citation admitting Exhibit O into evidence; Receive email from Court with amended Exhibit List; Update Client's file accordingly; Conference w/ Attorney Abrams and Attorney Goldstein re: same; Download and organize transcripts from Trial on March 5th and March 12th; Conference w/ Attorney Abrams and Attorney Goldstein re: same;	2.00

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April 15, 2021
Statement # 33969
Page # 2

Download videos from Trial date of April 2nd (just now available) and order transcript for same; Receive email from Opposing Counsel requesting a copy of Exhibit O; Review file and record to confirm pages of Exhibit O; Conference w/ Attorney Abrams and Attorney Goldstein re: same; Email to Opposing Counsel and Court re: Attached Exhibit O and request for Court to confirm same; Receive email from Court re: same

04/08/21	PL	Download transcript from Trial date of April 2nd; Conference w/ Attorney Abrams and Attorney Goldstein re: same; Begin working on Closing Argument Brief	0.50
04/13/21	PL	Exchange emails w/ Attorney Maupin re: [REDACTED]	0.40
04/15/21	PL	Receive and review file-stamped Stipulation and Order to Extend Briefing Deadline; Update deadlines accordingly	0.20

Total of 9.00 AT Attorney Abrams' Hours @ \$500.00 = \$4,500.00

Total of 8.50 PL Paralegal Stolz's Hours @ \$175.00 = \$1,487.50

Total for Services \$5,987.50

Total Fees and Costs on This Statement \$5,987.50

Payments from Trust Account on This Statement - \$2,592.50

Unpaid Accounts Receivable Balance as of This Statement \$3,395.00

Your required minimum Trust Account Balance at this time is \$5,000.00

Therefore, please include the following amount in your next payment \$5,000.00

TOTAL BALANCE DUE NOW \$8,395.00

Recent Activity in Trust Account

Balance Forward

AA08183

The
ABRAMS & MAYO

Law Firm

April 15, 2021
Statement # 33969
Page # 3

		\$2,592.50	
04/15/21	Payment for invoice: 33969		\$2,592.50
Your remaining Trust Account Balance is		\$0.00	



The
ABRAMS & MAYO
Law Firm

Dr. Danka Michaels
9517 Queen Charlotte Drive
Las Vegas, Nevada 89145

Jennifer V. Abrams, Esq.

Vincent Mayo, Esq.

Rena G. Hughes, Esq.

6252 South Rainbow Blvd.
Suite 100

Las Vegas, Nevada 89118

Telephone (702) 222-4021

Facsimile (702) 248-9750

August 15, 2021

Statement # 34638

Due Upon Receipt

RE: Thomas A. Pickens v. Danka K. Michaels

Statement of Account

Date	AT/PL/LS	Activity	Hours
08/05/21	AT	Receive and review documents from Court re: Decision in favor of Client; Telephone conference with Attorney Goldstein re: Memo of fees and costs [REDACTED]	0.50
		[REDACTED] Conference w/ Paralegal Stolz re: case related matters	
	PL	Conference w/ Attorney Abrams re: Decision; Conferences w/ Attorney Abrams today and on August 13th re: Instructions for Memo of Fees and Costs; Exchange emails w/ Client re: Final Order; Instructions to Legal Secretary re: same (Combined entry)	0.30
Total of	0.50 AT	Attorney Abrams' Hours @ \$500.00 =	\$250.00
Total of	0.30 PL	Paralegal Stolz's Hours @ \$175.00 =	\$52.50
Total for Services			\$302.50
Balance from Last Statement Before any Payments			\$200.00
Payments From Trust Account On and/or Since Last Statement			- \$200.00
Total Fees and Costs on This Statement			\$302.50
Payments from Trust Account on This Statement			- \$302.50
Unpaid Accounts Receivable Balance as of This Statement			\$0.00
Your required minimum Trust Account Balance at this time is			\$2,500.00
Therefore, please include the following amount in your next payment			\$302.50
<u>TOTAL BALANCE DUE NOW</u>			<u>\$302.50</u>

The
ABRAMS & MAYO

Law Firm

August 15, 2021
Statement # 34638
Page # 2

Recent Activity in Trust Account		Balance Forward	
07/26/21	Check # 724981983 - Thank You.	\$2,700.00	
	Payment on A/R Balance - Thank You.		\$200.00
08/15/21	Payment for invoice: 34638		\$302.50
Your remaining Trust Account Balance is		\$2,197.50	

EXHIBIT “C”

OFFER

Jennifer V. Abrams, Esq.
Nevada State Bar Number: 7575
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: JVAGroup@TheAbramsLawFirm.com
Attorney for Defendant

Eighth Judicial District Court
Family Division
Clark County, Nevada

THOMAS A. PICKENS, individually,) Case No.: D-17-560737-D
and as trustee of the LV Blue Trust,)

Plaintiff,)

vs.)

DANKA K. MICHAELS,)
individually, and as trustee of the)
Mich-Mich Trust,)

Defendant)

Department: J

OFFER OF JUDGMENT

TO: THOMAS A. PICKENS, Plaintiff;

TO: MICHELE T. LOBELLO, ESQ., 10777 West Twain Avenue, Suite
300, Las Vegas, Nevada 89135, Attorney for Plaintiff;

Defendant, Danka K. Michaels (hereinafter referred to as

“Danka”), hereby submits this Offer of Judgment to Plaintiff, Thomas A.

1 Pickens (hereinafter referred to as "Tom"), pursuant to NRCP 68. This
2 Offer of Judgment is being submitted in order to resolve all issues
3 involving Tom's *Second Amended Complaint for Equitable Relief Under*
4 *(1) The Putative Spouse Doctrine, and (2) Pursuant to Express and/or*
5 *Implied Agreement to Hold Property as if the Parties Were Married*
6 *Under Michoff; and to Set Aside Deeds of Real Property and*
7 *Assignment of L.L.C. Interest* and Danka's Counterclaim filed in the
8 above-captioned action. Pursuant to and consistent with NRCP 68,
9 Danka hereby offers to dismiss all claims in this action, upon payment
10 from Tom in the total sum of TWENTY THOUSAND DOLLARS
11 (\$20,000). It is intended that this Offer is inclusive of all accrued
12 interest, costs, attorney's fees, expert fees and any other sums that could
13 be claimed in the above-captioned action. This offer is contingent on the
14 following:

15 1. Tom dismisses his Second Amended Complaint with
16 prejudice as to all causes of action.

17 2. Danka dismisses her Counterclaim with prejudice as to all
18 causes of action.

19 3. Each party to remove the other's name from any liabilities or
20 personal guarantees associated with the assets titled in their respective
21 names or with their respective liabilities.

1 4. Each party shall keep their respective assets and debts.

2 5. Each party to be solely responsible for their own taxes. If

3 requested by Tom, Danka will confirm in writing that Tom did not

4 transfer value to Danka, given Nevada law that unmarried cohabitants

5 own property in proportion to their contributions to acquisition of such

6 property, in order to document the basis for which Tom would not owe

7 gift taxes.

8 Danka advises Tom that she will be seeking remedies of NRCP

9 68(f), and will be seeking from Tom a judgment of reasonable attorney's

10 fees and/or costs that will be incurred by her from this point forward, or

11 at the very latest, from the point in time which this Offer expires, in the

12 event that Tom chooses, with or without consultation with counsel, not

13 to accept this Offer before it expires. Tom is cautioned to guide himself

14 accordingly.

15 Acceptance of this Offer of Judgment will settle this case in its

16 entirety.

17 ///

18 ///

19 ///

20 ///

21 ///

1 This Offer of Judgment will expire fourteen (14) days after the date
2 of service upon Tom's attorney.

3 DATED Monday, June 24, 2019.

4 Respectfully Submitted,

5 THE ABRAMS & MAYO LAW FIRM

6 /s/ Jennifer V. Abrams, Esq.

Jennifer V. Abrams, Esq.

7 Nevada State Bar Number: 7575

8 6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

9 Phone: (702) 222-4021

Fax: (702) 248-9750

10 Attorney for Defendant

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that the foregoing OFFER OF JUDGMENT was
13 electronically served in accordance with the Master List, pursuant to
14 NEFCR, on Monday, June 24, 2019 as follows:

15 Michele T. LoBello, Esq.
16 Attorney for Plaintiff

17 /s/ Chantel Wade

18 An Employee of The Abrams & Mayo Law Firm

EXHIBIT “D”

OFFER

Jennifer V. Abrams, Esq.
Nevada State Bar Number: 7575
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
Email: JVAGroup@TheAbramsLawFirm.com
Attorney for Defendant

Eighth Judicial District Court
Family Division
Clark County, Nevada

THOMAS A. PICKENS, individually,) Case No.: D-17-560737-D
and as trustee of the LV Blue Trust,)

Plaintiff,)

vs.)

DANKA K. MICHAELS,)
individually, and as trustee of the)
Mich-Mich Trust,)

Defendant)

SECOND OFFER OF JUDGMENT

TO: THOMAS A. PICKENS, Plaintiff;

TO: MICHELE T. LOBELLO, ESQ., 10777 West Twain Avenue, Suite
300, Las Vegas, Nevada 89135, Attorney for Plaintiff;

Defendant, Danka K. Michaels (hereinafter referred to as

“Danka”), hereby submits this Offer of Judgment to Plaintiff, Thomas A.

1 Pickens (hereinafter referred to as “Tom”), pursuant to NRCP 68. This
2 Offer of Judgment is being submitted in order to resolve all issues
3 involving Tom’s *Second Amended Complaint for Equitable Relief Under*
4 *(1) The Putative Spouse Doctrine, and (2) Pursuant to Express and/or*
5 *Implied Agreement to Hold Property as if the Parties Were Married*
6 *Under Michoff; and to Set Aside Deeds of Real Property and*
7 *Assignment of L.L.C. Interest* and Danka’s *Counterclaim* filed in the
8 above-captioned action. Pursuant to and consistent with NRCP 68,
9 Danka hereby offers to dismiss all claims in return for Tom dismissing
10 all claims. It is intended that this Offer is inclusive of all accrued
11 interest, costs, attorney’s fees, expert fees and any other sums that could
12 be claimed in the above-captioned action. This offer is contingent on the
13 following:

14 1. Tom dismisses his Second Amended Complaint with
15 prejudice as to all causes of action.

16 2. Danka dismisses her Counterclaim with prejudice as to all
17 causes of action.

18 3. Each party to remove the other’s name from any liabilities or
19 personal guarantees associated with the assets titled in their respective
20 names or with their respective liabilities.

21 4. Each party shall keep their respective assets and debts.

1 5. Each party to be solely responsible for their own taxes. If
2 requested by Tom, Danka will confirm in writing that Tom did not
3 transfer value to Danka, given Nevada law that unmarried cohabitants
4 own property in proportion to their contributions to acquisition of such
5 property, in order to document the basis for which Tom would not owe
6 gift taxes.

7 Danka advises Tom that she will be seeking remedies of NRCP
8 68(f), and will be seeking from Tom a judgment of reasonable attorney's
9 fees and/or costs that will be incurred by her from this point forward, or
10 at the very latest, from the point in time which this Offer expires, in the
11 event that Tom chooses, with or without consultation with counsel, not
12 to accept this Offer before it expires. Tom is cautioned to guide himself
13 accordingly.

14 Acceptance of this Offer of Judgment will settle this case in its
15 entirety.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

1 This Offer of Judgment will expire fourteen (14) days after the date
2 of service upon Tom's attorney.

3 DATED Thursday, November 21, 2019.

4 Respectfully Submitted,

5 THE ABRAMS & MAYO LAW FIRM

6 /s/ Jennifer V. Abrams, Esq.

7 Jennifer V. Abrams, Esq.

8 Nevada State Bar Number: 7575

6252 South Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

9 Phone: (702) 222-4021

Fax: (702) 248-9750

10 Attorney for Defendant

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that the foregoing SECOND OFFER OF
13 JUDGMENT was electronically served in accordance with the Master
14 List, pursuant to NEFCR, on Thursday, November 21, 2019 as follows:

15 Michele T. LoBello, Esq.
16 Attorney for Plaintiff

17 /s/ Chantel Wade
18 An Employee of The Abrams & Mayo Law Firm

EXHIBIT “E”

BLACK & LOBELLO

10777 West Twain Avenue, Suite 300
Las Vegas, Nevada 89135
702-869-8801 FAX: 702-869-2669

OFFER

BLACK & LOBELLO
Michele Touby LoBello, Esq.
Nevada Bar No. 5527
10777 West Twain Avenue, Suite 300
Las Vegas, Nevada 89135
Telephone No.: 702-869-8801
Facsimile No.: 702-869-2669
Email: mlobello@blacklobello.law
Attorneys for Plaintiff,
THOMAS A. PICKENS

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

THOMAS A. PICKENS,
Individually and as Trustee of the LV
Blue Trust,

Plaintiff.

vs.

DANKA K. MICHAELS,
Individually and as Trustee of the Mich-
Mich Trust,

Defendant.

CASE NO.: D-17-560737-D
DEPT. J

PLAINTIFF'S OFFER OF JUDGMENT TO DEFENDANT

TO: DANKA K. MICHAELS, Individually and as Trustee of the Mich-Mich Trust,
Defendant; and

TO: Jennifer V. Abrams, Esq., The Abrams & Mayo Law Firm, Attorneys for
Defendant:

Plaintiff, Thomas A. Pickens ("Tom"), by and through his attorneys of record,
Michele Touby LoBello and the law firm of Black & LoBello, hereby submits his
OFFER OF JUDGMENT to Defendant, DANKA K. MICHAELS, Individually and

1 as Trustee of the Mich-Mich Trust ("Danka"), pursuant to NRS 125.141 and NRCP
2 68, with the intent to resolve any and all claims that either party may have against
3 the other in the above captioned matter, including but not limited to property, debts,
4 attorneys' fees and costs, and except those set forth at NRS 125.141(6) (issues related
5 to the custody of a child, the support of a child, or the support of a spouse),
6 specifically as set forth in Plaintiff's Second Amended Complaint for Equitable
7 Relief Under (1) The Putative Spouse Doctrine, and (2) Pursuant to Express and/or
8 Implied Agreement to Hold Property as if the Parties Were Married Under *Michoff*,
9 and to Set Aside Deeds of Real Property and Assignment of LLC Interest, as well as
10 Danka's pending Counterclaims on file herein. Pursuant hereto, Tom hereby offers
11 to dismiss all claims in this action, upon payment from Danka in the total sum of
12 One Million Three Hundred Thousand Dollars (\$1,300,000.00). This offer is
13 inclusive of all accrued interest, costs, attorneys' fees, expert fees and any other sums
14 that could be claimed in the above captioned matter. This offer is contingent upon
15 the following:
16
17
18
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20

- 21 1. Danka dismisses her Counterclaims on file in this matter with prejudice
22 as to all causes of action asserted by her against Tom.
23
- 24 2. Tom dismisses his Second Amended Complaint with prejudice as to all
25 causes of action asserted against Danka.
26
- 27 3. Each party shall keep the assets titled in their respective name or in the
28 name of any entity owned by said party, and each party shall assume

1 any debts in their name or in the name of any entity owned by said
2 party.

- 3
4 4. Each party shall be responsible for their own tax obligations, and Danka
5 will confirm in writing that Tom did not and has not ever transferred
6 value to Danka, as well as execute any other necessary documents,
7 demonstrating that Tom would not owe gift taxes related to his transfers
8 of property to Danka prior to the filing of this matter.
9

10 This Offer of Judgment is made for the purposes specified in NRCP 68 and/or
11 NRS 125.141(4) and is not to be construed as an admission of any kind whatsoever.

12 This Offer of Judgment is made to resolve all issues and claims of any and all monies
13 owed from one party to the other, with the intent to resolve any and all claims that
14 either party may have against the other, but does not include any issues set forth at
15 NRS 125.141(6) (issues related to the custody of a child, the support of a child or
16 the support of a spouse). This Offer of Judgment is for settlement purposes only and
17 shall not constitute an admission by Tom in any future proceeding. The document
18 and information contained herein are not admissible pursuant to NRS 48.105 and
19 NRCP 68.
20

21 Tom places Danka on Notice that he will seek the remedies of NRCP 68
22 and/or 125.141(4), and any other appropriate remedies upon an award by the Court
23 in Tom's favor of one cent (\$.01) or more than that which he has offered to Danka
24 in this Offer of Judgment.
25
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28

1 Tom advises Danka that he will be seeking remedies of NRS 125.141(4), and
2 will be seeking from a judgment of reasonable attorneys' fees and/or costs that will
3 be incurred by him from this point forward, or at the very latest, from the point in
4 time when this Offer of Judgment is automatically rescinded and expires, because it
5 was not accepted by Danka, in the event that Danka chooses, with or without
6 consultation with her counsel, not to accept this Offer before it expires. Danka is
7 cautioned to guide herself accordingly.

10 Acceptance of this Offer of Judgment will settle all claims by each party
11 against the other, including damages, assets, liabilities, taxes, property division and
12 requests for attorneys' fees and costs in their entirety. If this Offer of Judgment is
13 not accepted within ten (10) after date of service, it shall automatically expire
14 according to its own terms and according to Nevada Revised Statutes and Nevada
15 Rules of Civil Procedure.

18 DATED this 9th day of December, 2019.

20 **BLACK & LOBELLO**

21
22 
23 Michele Touby LoBello
24 Nevada State Bar No. 5527
25 10777 West Twain Avenue, Suite 300
26 Las Vegas, Nevada 89135
27 (702) 869-8801
28 Attorneys for Plaintiff,
THOMAS A. PICKENS

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of BLACK & LOBELLO and that on the 9th day of December, 2019, I caused the above and foregoing document entitled foregoing PLAINTIFF'S OFFER OF JUDGMENT TO DEFENDANT to be served as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and
- ☒ pursuant to N.E.F.C.R. 9, to be sent via electronic service;
- ☐ pursuant to EDCR 7.26, to be sent via facsimile;
- ☒ by email to
- ☐ hand delivered

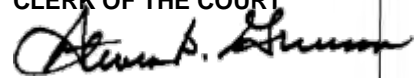
to the party or their attorney(s) listed below at the address and/or facsimile number indicated below:

Jennifer V. Abrams, Esq.
The Abrams & Mayo Law Firm
6252 South Rainbow Blvd., #100
Las Vegas, NV 89118
Email: JVAGroup@TheAbramsLawFirm.com
Attorney for Defendant

and that there is regular communication by mail between the place of mailing and the place(s) so addressed.



An Employee of Black & LoBello



1 ASTA
2 JONES & LOBELLO
3 John D. Jones
4 Nevada Bar No. 6699
5 Michele LoBello
6 Nevada Bar No. 5527
7 9950 W. Flamingo Rd, #100
8 Las Vegas, Nevada 89147
9 Telephone No.: 702-318-5060
10 Facsimile No.: 702-318-5070
11 Email: jones@joneslobello.com
12 Email: lobello@joneslobello.com
13 Attorneys for Plaintiff,
14 THOMAS A. PICKENS

11 DISTRICT COURT
12 FAMILY DIVISION
13 CLARK COUNTY, NEVADA

14 THOMAS A. PICKENS,
15 Individually and as Trustee of the LV
16 Blue Trust,

17 Plaintiff

18 vs.

CASE NO.: D-17-560737-D
DEPT. J

19 DANKA K. MICHAELS,
20 Individually and as Trustee of the Mich-
21 Mich Trust

22 Defendant

23 CASE APPEAL STATEMENT

24 1. Name of appellant filing this case appeal statement:

25 THOMAS A. PICKENS.

26 2. Identify the judge issuing the decision, judgment, or order
27 appealed from:

28 Honorable Dianne Steel.

JONES & LOBELLO
9950 W. Flamingo Rd, #400
Las Vegas, Nevada 89147
702-318-5060 FAX: 702-318-5070

1 **3. Identify each appellant and the name and address of counsel for**
2 **each appellant:**

3 Plaintiff/Appellant: THOMAS A. PICKENS

4 John D. Jones, Esq.
5 Nevada Bar No: 6699
6 Michele LoBello, Esq.
7 Nevada Bar No.: 5527
8 JONES & LOBELLO
9 9950 W. Flamingo Rd, #100
10 Las Vegas, Nevada 89147

11 **4. Identify each respondent and the name and address of appellate**
12 **counsel, if known, for each respondent (if the name of a respondent's appellate**
13 **counsel is unknown, indicate as much and provide the name and address of that**
14 **respondent's trial counsel):**

15 Plaintiff/Respondent: DANKA K. MICHAELS

16 Counsel for Defendant/Respondent:
17 Shawn M. Goldstein
18 Nevada Bar No. 9814
19 Goldstein Law Ltd.
20 10161 Park Run Drive, Suite 150
21 Las Vegas, NV 89145

22 Co-Counsel for Defendant/Respondent:
23 Jennifer V. Abrams, Esq.
24 Nevada Bar No. 7575
25 The Abrams & Mayo Law Firm
26 6252 South Rainbow Blvd., #100
27 Las Vegas, NV 89118

28 **5. Indicate whether any attorney identified above in response to**
question 3 or 4 is not licensed to practice law in Nevada and, if so, whether the
district court granted that attorney permission to appear under SCR 42 (attach
a copy of any district court order granting such permission):

No.

1 **6. Indicate whether appellant was represented by appointed or**
2 **retained counsel in the district court:**

3 Appellant was represented by retained counsel in the district court.

4 **7. Indicate whether appellant is represented by appointed or**
5 **retained counsel on appeal:**

6 Appellant is represented by retained counsel on appeal.

7 **8. Indicate whether appellant was granted leave to proceed in forma**
8 **pauperis, and the date of entry of the district court order granting such leave:**

9 No.

10 **9. Indicate the date the proceedings commenced in the district court**
11 **(e.g. Date complaint, indictment, information, or petition was filed):**

12 October 24, 2017.

13 **10. Provide a brief description of the nature of the action and result**
14 **in the district court, including the type of judgment or order being appealed and**
15 **the relief granted by the district court:**

16 The underlying cause of action was based on a Complaint for Divorce,
17 and for Set Aside of Deeds of Real Property and Assignment of L.L.C.
18 Interest, originally filed in this matter on October 24, 2017.

19 On November 29, 2017, Defendant/Respondent, DANKA K.
20 MICHAELS, filed a MOTION TO DISMISS, and on December 20, 2017,
21 Plaintiff/Appellant filed an Opposition to Defendant's Motion to Dismiss and
22 Countermotion for Attorney's Fees and Costs.

23 On January 19, 2018, Defendant/Respondent filed a Reply To
24 Opposition to Defendants Motion to Dismiss and Opposition to
25 Countermotion for Attorney's Fees and Costs.

26 On March 22, 2018, Plaintiff/Appellant filed a First Amended
27 Complaint for Divorce; for Set Aside of Deeds of Real Property and
28

1 Assignment of LLC Interest; and for Alternative Equitable Relief Under the
2 Putative Spouse Doctrine, and on May 2, 2018, Defendant/Respondent filed
3 an Answer to First Amended Complaint for Divorce; for Set Aside of Deeds
4 of Real Property and Assignment of LLC Interest; and for Alternative
5 Equitable Relief Under the Putative Spouse Doctrine.

6 On May 30, 2018, Plaintiff/Appellant filed a Reply to Defendant's
7 Counterclaim, and thereafter on September 7, 2018 filed a Motion for Leave
8 to File Second Amended Complaint.

9 On October 8, 2018, a Stipulation and Order was entered, granting
10 Leave to File Second Amended Complaint and Vacating Motion Hearing.
11 Plaintiff/Appellant filed his Second Amended Complaint for Equitable Relief
12 Under (1) Putative Spouse Doctrine, and (2) Pursuant to Express and/or
13 Implied Agreement to Hold property as if the Parties Were Married Under
14 Michoff; and to Set Aside Deeds of Real Property and Assignment of LLC
15 Interest.

16 On November 21, 2018, Defendant/Respondent filed an Answer to
17 Second Amended Complaint for Equitable Relief Under (1) Putative Spouse
18 Doctrine, and (2) Pursuant to Express and/or Implied Agreement to Hold
19 property as if the Parties Were Married Under Michoff; and to Set Aside
20 Deeds of Real Property and Assignment of LLC Interest; Affirmative
21 Defenses and Counterclaim and on November 21, 2018 she filed her
22 Declaration in Support, and on December 12, 2018, Plaintiff/Appellant filed
23 a Reply to Defendant's Counterclaim.

24 On April 22, 2019, Defendant/Respondent filed Defendant's Motion to
25 Compel Discovery Responses and an Appendix of Exhibits, and on May 13,
26 2019, Plaintiff/Appellant filed Plaintiff's Response and Opposition to
27 Defendant's Motion to Compel Discovery Responses.
28

1 On May 15, 2019, Defendant/Respondent filed a Reply in Support of
2 Defendant's Motion to Compel Discovery Responses and on May 21, 2019,
3 Plaintiff/Appellant file Plaintiff's Supplement to Response and Opposition to
4 Defendant's Motion to Compel Discovery Responses. The parties then
5 entered into a Stipulation and Order re Motion to Compel, which was entered
6 on May 28, 2019.

7 On August 2, 2019 Defendant/Respondent filed a Motion for Summary
8 Judgment, to Dismiss, for Protective Order and for Attorney Fees. On August
9 12, 2019 Plaintiff/Appellant filed Plaintiffs Opposition to Defendants Motion
10 for Summary Judgment, To Dismiss, For Protective Order and for Attorney
11 Fees and Countermotion for Leave of Court to File Supplemental Points and
12 Authorities. On August 19, 2019, P/R then filed Plaintiff's Opposition To
13 Defendant's Motion For Summary Judgment, To Dismiss, For Protective
14 Order And For Attorney Fees and Countermotion (1) To Dismiss Or, In The
15 Alternative, For Summary Judgment As To Defendant's Causes Of Action
16 For Intentional Misrepresentation/Fraud; Negligent Misrepresentation;
17 Breach Of Implied Covenant Of Good Faith And Fair Dealing; Promissory
18 Estoppel; Express Agreement; Implied Agreement; And Malicious Abuse Of
19 Process;(2) For Summary Judgment Setting Aside Deeds Of Real Property
20 And Assignment Of Llc Interest; And(3) For Permission To Submit Points
21 And Authorities In Excess Of 30 Pages Pursuant To EDCR 5.503(E), and an
22 Appendix of Exhibits thereto. On September 6, 2019, Defendant/Respondent
23 filed her Reply to Plaintiff's Opposition To Defendant's Motion For Summary
24 Judgment, To Dismiss, For Protective Order And For Attorney Fees and
25 Countermotion (1) To Dismiss Or, In The Alternative, For Summary
26 Judgment As To Defendant's Causes Of Action For Intentional
27 Misrepresentation/Fraud; Negligent Misrepresentation; Breach Of Implied
28

1 Covenant Of Good Faith And Fair Dealing; Promissory Estoppel; Express
2 Agreement; Implied Agreement; And Malicious Abuse Of Process;(2) For
3 Summary Judgment Setting Aside Deeds Of Real Property And Assignment
4 Of Llc Interest; And(3) For Permission To Submit Points And Authorities In
5 Excess Of 30 Pages Pursuant To EDCR 5.503(E), and her Appendix of
6 Exhibits.

7 Following a non-jury trial conducted on February 21, 2020, February
8 26, 2020, March 5, 2021, March 12, 2021, and April 2, 2021, on August 3,
9 2021 the Court entered its Findings of Fact, Conclusions of Law and
10 Judgment.

11 **11. Indicate whether the case has previously been the subject of an**
12 **appeal to or original writ proceeding in the supreme court and, if so, the caption**
13 **and supreme court docket number of the prior proceeding:**

14 No.

15 **12. Indicate whether this appeal involves child custody or visitation**

16 No.

17 **13. If this is a civil case, indicate whether this appeal involves the**
18 **possibility of settlement:**

19 Yes.

20 RESPECTFULLY SUBMITTED this 2 day of September, 2021.

21 JONES & LOBELLO

22
23 John D. Jones, Esq.
24 Nevada Bar No. 6699
25 Michele LoBello, Esq
26 Nevada Bar No. 5527
27 9950 W. Flamingo Rd, #100
28 Las Vegas, Nevada 89147
Attorneys for Plaintiff
Thomas A. Pickens

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of JONES & LOBELLO and that on the 2nd day of September, 2021, I caused the above and foregoing document entitled foregoing CASE APPEAL STATEMENT, to be served as follows:

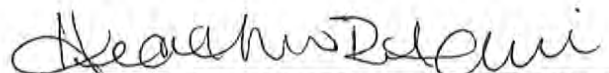
- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and
- ☒ pursuant to N.E.F.C.R. 9, to be sent via electronic service;
- ☐ pursuant to EDCR 7.26, to be sent via facsimile;
- ☒ by email to

to the party or their attorney(s) listed below at the address and/or facsimile number indicated below:

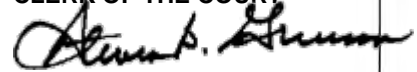
Jennifer V. Abrams, Esq.
The Abrams & Mayo Law Firm
6252 South Rainbow Blvd., #100
Las Vegas, NV 89118
Email: JVAGroup@TheAbramsLawFirm.com
Attorney for Defendant

Shawn M. Goldstein, Esq.
GOLDSTEIN LAW, LTD.
1980 Festival Plaza Drive, Suite 300
Las Vegas, NV 89135
Email: shawn@goldsteinlawltd.com
Attorney for Defendant,

and that there is regular communication by mail between the place of mailing and the place(s) so addressed.



An Employee of JONES & LOBELLO



1 NOAS
2 JONES & LOBELLO
3 John D. Jones
4 Nevada Bar No. 6699
5 Michele LoBello
6 Nevada Bar No. 5527
7 9950 W. Flamingo Rd, #100
8 Las Vegas, Nevada 89147
9 Telephone No.: 702-318-5060
10 Facsimile No.: 702-318-5070
11 Email: jones@joneslobello.com
12 Email: lobello@joneslobello.com
13 Attorneys for Plaintiff,
14 THOMAS A. PICKENS

11 DISTRICT COURT
12 FAMILY DIVISION
13 CLARK COUNTY, NEVADA

14 THOMAS A. PICKENS,
15 Individually and as Trustee of the LV
16 Blue Trust,

17 Plaintiff

18 vs.

CASE NO.: D-17-560737-D
DEPT. J

19 DANKA K. MICHAELS,
20 Individually and as Trustee of the Mich-
21 Mich Trust

22 Defendant

23 NOTICE OF APPEAL

24
25 NOTICE is hereby given that Plaintiff, THOMAS A. PICKENS, hereby
26 appeals to the Supreme Court of Nevada the District Court, Family Division, Clark

27 ///

28 ///

JONES & LOBELLO
9950 W. Flamingo Rd, #400
Las Vegas, Nevada 89147
702-318-5060 FAX: 702-318-5070

1 County, Nevada Findings of Fact, Conclusions of Law, and Judgment, entered on
2 August 5, 2021, attached hereto as Exhibit "1".

3 RESPECTFULLY SUBMITTED this 2 day of September, 2021.

4 JONES & LOBELLO

5
6
7 
8 John D. Jones, Esq.

9 Nevada Bar No. 6699

10 Michele LoBello, Esq

11 Nevada Bar No. 5527

12 9950 W. Flamingo Rd, #100

13 Las Vegas, Nevada 89147

14 *Attorneys for Plaintiff*

15 Thomas A. Pickens

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of JONES & LOBELLO and that on the 2nd day of September, 2021, I caused the above and foregoing document entitled foregoing NOTICE OF APPEAL, to be served as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and
- ☒ pursuant to N.E.F.C.R. 9, to be sent via electronic service;
- ☐ pursuant to EDCR 7.26, to be sent via facsimile;
- ☒ by email to

to the party or their attorney(s) listed below at the address and/or facsimile number indicated below:

Jennifer V. Abrams, Esq.
The Abrams & Mayo Law Firm
6252 South Rainbow Blvd., #100
Las Vegas, NV 89118
Email: JVAGroup@TheAbramsLawFirm.com
Attorney for Defendant

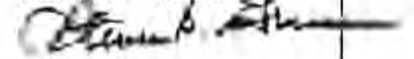
Shawn M. Goldstein, Esq.
GOLDSTEIN LAW, LTD.
1980 Festival Plaza Drive, Suite 300
Las Vegas, NV 89135
Email: shawn@goldsteinlawltd.com
Attorney for Defendant,

and that there is regular communication by mail between the place of mailing and the place(s) so addressed.


An Employee of JONES & LOBELLO

EXHIBIT 1

EXHIBIT 1



1 **NEOJ**

2 **THE ABRAMS & MAYO LAW FIRM**

3 Jennifer V. Abrams, Esq.

4 Nevada Bar No. 007575

5 6252 South Rainbow Blvd., STE 100

6 Las Vegas, Nevada 89118

7 T: 702.222.4021

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9 jvagroup@theabramslawfirm.com

10 Attorney for Defendant,

11 Danka J. Michaels

12 **GOLDSTEIN LAW LTD.**

13 Shawn M. Goldstein, Esq.

14 Nevada Bar No. 009814

15 10161 Park Run Dr., STE 150

16 Las Vegas, Nevada 89145

17 T: 702.919.1919

18 F: 702.637.4357

19 shawn@goldsteinlawltd.com

20 co-counsel for Defendant

13 **DISTRICT COURT**
14 **FAMILY DIVISION**
15 **CLARK COUNTY, NEVADA**

16 THOMAS A. PICKENS, individually, and as
17 trustee of the LV Blue Trust

18 Plaintiff,

19 vs.

20 DANKA K. MICHAELS, individually, and
21 as trustee of the Mich-Mich Trust,

Defendant.

CASE NO. D-17-560737-D

DEPT. NO. J

20 **NOTICE OF ENTRY OF FINDINGS OF FACT,**
21 **CONCLUSIONS OF LAW, AND JUDGMENT**

GOLDSTEIN LAW LTD.
10161 W. PARK RUN DR., STE 150
LAS VEGAS, NEVADA 89145
T: 702.919.1919 | F: 702.637.4357

1 TO: THOMAS A. PICKENS, Plaintiff; and

2 TO: JOHN D. JONES, ESQ., Counsel for Plaintiff.

3 PLEASE TAKE NOTICE that a Findings of Fact, Conclusions of Law, and
4 Judgment was entered in the above-entitled action on the 3rd day of August 2021.

5 A true and correct copy of the Findings of Fact, Conclusions of Law, and
6 Judgment is attached hereto.

7 Dated: August 5, 2021.

8 GOLDSTEIN LAW LTD.

9 By: /s/ Shawn M. Goldstein
10 Shawn M. Goldstein, Esq.
11 Nevada Bar No. 009814
12 10161 W. Park Run Dr., STE 150
13 Las Vegas, Nevada 89145
14 Attorney for Defendant,
15 Danka J. Michaels
16
17
18
19
20
21

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of Goldstein Law
3 Ltd., and that on August 5, 2021 I served a true and correct copy of the documents
4 described herein by the method indicated below, and addressed to the following:

5 **Documents served:**

6 Notice of Entry of Findings of Fact, Conclusions of Law, and Judgment.

7 **Persons Served:**

8 John D. Jones, Esq.

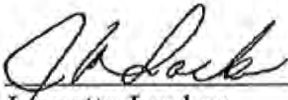
9 **Manner of Service:**

10 Via Electronic Service through the Court's electronic filing.

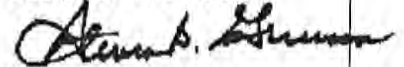
11 John D. Jones, Esq.
12 Jones & LoBello
13 9950 W. Flamingo Road, Ste. 100
14 Las Vegas, Nevada 89147

15 Dated: August 5, 2021

16 Goldstein Law Ltd.

17 

18 Jeanette Lackner
19
20
21



1 FFCL

2
3 DISTRICT COURT
4 FAMILY DIVISION
5 CLARK COUNTY, NEVADA

6 THOMAS A. PICKENS,
7 Individually and as Trustee of the LV
8 Blue Trust,

CASE NO.: D-17-560737-D
DEPT. J

9 Plaintiff/Counterdefendant;
10 vs.

Dates of Trial: February 14, 2020 &
February 21, 2020, March 5, 2021
and March 12, 2021 & April 2, 2021

11 DR. DANKA K. MICHAELS,
12 Individually and as Trustee of the
13 Mich-Mich Trust,

14 Defendant/Counterclaimant;
15 and related Counterclaims.

16 **FINDINGS OF FACT, CONCLUSIONS OF LAW,**
17 **AND JUDGMENT**

18 The above captioned matter having come before this Honorable Court for
19 trial on February 14, 2020; February 21, 2020; March 5, 2021; March 12, 2021 and
20 April 2, 2021, upon the Second Amended Complaint of Plaintiff, THOMAS
21 ALLEN PICKENS ("Mr. Pickens"), present and represented by his attorneys,
22 John D. Jones, Michele LoBello and JONES & LOBELLO; and upon the
23 Counterclaim of Defendant, DR. DANKA K. MICHAELS ("Dr. Michaels"),
24 present and represented by her attorneys, Jennifer Abrams and THE ABRAMS &
25 MAYO LAW FIRM, and Shawn M. Goldstein and the law firm of GOLDSTEIN
26 LAW LTD., the Court, having reviewed the papers and pleadings on file, having
27 received and considered the testimony of the parties and other witnesses, having
28

1 weighed the credibility of the witnesses, having reviewed the substantial
2 documents and information received into evidence, having heard the argument of
3 counsel, and for good cause appearing, hereby FINDS, CONCLUDES AND
4 ORDERS as follows:

5 I.

6 **FINDINGS OF FACT**

7
8 **THE COURT FINDS** this Court has complete jurisdiction in the premises
9 both as to the subject matter hereof and the parties hereto; Defendant Dr. Danka K.
10 Michaels (Dr. Michaels) has established residency in Clark County, Nevada and
11 she is and has been for at least six (6) weeks prior to filing her Answer and
12 Counterclaim and up to the present, an actual and bona fide resident of Clark
13 County, State of Nevada and has maintained a residence in the State of Nevada,
14 and has the intent to indefinitely reside in the State of Nevada.

15 **THE COURT FURTHER FINDS** that

- 16 • September 8, 2016, Mr. Pickens' new significant other called Dr.
17 Michaels to inform her that she was pregnant with Mr. Pickens child
18 and revealed that she knew of a great personal tragedy suffered by
19 Dr. Michaels as a child. Later that same day, Mr. Pickens
20 volunteered to sign everything over to Dr. Michaels, to wit: "Danka,
21 there's nothing that I can say that will change anything. It should
22 have not happened, but it did. I will sign everything that we have
23 together over to you. I should have not have put myself into this
24 position. I know you will never forgive me and you shouldn't."
- 25 • September 9, 2016, Attorney Shannon Evans, Esq., in a note to her
26 staff stated "they do not need a divorce, and he will agree assets
27 being Danka's since she pays for the properties and he is guilty."
- 28 • September 13, 2016, Mr. Pickens and Dr. Michaels met with
Attorney Shannon Evans, Esq., and, after signing a waiver of conflict,
Mr. Pickens signed over the deeds to two real properties, [Queen
Charlotte and Lowe Properties] and his interest in Patience One,

1 LLC. The Parties had already closed their joint checking account
2 during the summer.

- 3 • May 30, 2017, Mr. Pickens recorded the deed to his current residence
4 which he purchased as a single, unmarried person.
- 5 • October 24, 2017, Mr. Pickens filed a Complaint for Divorce and for
6 Set Aside of Deeds of Real Property and Assignment of LLC Interest.
7 His claims for relief were (1) Divorce; (2) Set Aside of Deeds of Real
8 Property and Assignment of LLC Interest;
- 9 • November 1, 2017, Dr. Michaels was served with a Joint Preliminary
10 Injunction, as evidenced in the Affidavit of Process Server filed in
11 this matter on November 2, 2017.
- 12 • November 29, 2017, Dr. Michaels filed a Motion to Dismiss;
- 13 • December 20, 2017 Mr. Pickens filed his Opposition and
14 Counterclaim for Attorney Fees;
- 15 • January 19, 2018, Dr. Michaels filed her Reply and Opposition to
16 Counterclaim;
- 17 • January 25, 2018, Judge Marquis denied the Motion to Dismiss after
18 hearing argument;
- 19 • March 9, 2018, Judge Marquis issued her Order denying the Motion
20 to Dismiss and denying Summary Judgment. Jurisdiction was
21 established in the Family Court pursuant to NRS 3.223; *Landreth v.*
22 *Malik*, 127 Nev. 175, 177, 251 P.3d 163, 164 (2011); and *Hay v. Hay*,
23 100 Nev. 196, 199, 678 P.2d. 672, 674 (1984).
- 24 • March 22, 2018, Mr. Pickens filed his First Amended Complaint for
25 Divorce; For Set Aside of Deeds of Real Property and Assignment of
26 L.L.C. Interest; and For Alternative Equitable Relief Under the
27 Putative Spouse Doctrine;
- 28 • May 2, 2018, Dr. Michaels filed her Answer to First Amended
 Complaint for Divorce; For Set Aside of Deeds of Real Property and
 Assignment of L.L.C. Interest; and For Alternative Equitable Relief

1 Under the Putative Spouse Doctrine; Affirmative Defenses and
2 Counterclaim;

- 3 • September 7, 2018. Mr. Pickens filed his Motion for Leave to File
4 Second Amended Complaint; (no opposition filed by Dr. Michaels)
- 5 • October 15, 2018, Mr. Pickens filed his Second Amended Complaint
6 for Equitable Relief Under (1) The Putative Spouse Doctrine, and (2)
7 Pursuant to Express and/or Implied Agreement to Hold Property as if
8 the Parties Were Married Under *Michoff*; and to Set Aside Deeds of
9 Real Property and Assignment of L.L.C. Interest; (Dropping his
10 request for Divorce, acknowledging that the Parties were not legally
11 or validly married).
- 12 • November 19, 2018, Dr. Michaels filed her Answer to Second
13 Amended Complaint for Equitable Relief Under (1) The Putative
14 Spouse Doctrine, and (2) Pursuant to Express and/or Implied
15 Agreement to Hold Property as if the Parties Were Married Under
16 *Michoff*; and to Set Aside Deeds of Real Property and Assignment of
17 L.L.C. Interest; Affirmative Defenses and Counterclaim;
- 18 • November 21, 2018, Dr. Michaels filed her Declaration in Support of
19 her Answer to Second Amended Complaint for Equitable Relief
20 Under (1) The Putative Spouse Doctrine, and (2) Pursuant to Express
21 and/or Implied Agreement to Hold Property as if the Parties Were
22 Married Under *Michoff*; and to Set Aside Deeds of Real Property and
23 Assignment of L.L.C. Interest; Affirmative Defenses and
24 Counterclaim;
- 25 • August 1, 2019, Dr. Michaels filed her Motion for Summary
26 Judgment, to Dismiss, for Protective Order and For Attorney Fees;
- 27 • August 12, 2019, Mr. Pickens filed his Opposition to Dr. Michaels'
28 Motion for Summary Judgment, To Dismiss, For Protective Order
and For Attorney Fees and Countermotion for Leave of Court to File
Supplemental Points and Authorities;
- August 19, 2019, Mr. Pickens filed his Opposition to Dr. Michaels'
Motion for Summary Judgment, To Dismiss, For Protective Order
and For Attorney Fees And Countermotion (1) To Dismiss, Or In The
Alternative, for Summary Judgment As to Dr. Michaels' Causes of

1 Action for Intentional Misrepresentation/Fraud; Negligent
2 Misrepresentation; Breach of Implied Covenant of Good Faith and
3 Fair Dealing; Promissory Estoppel; Express Agreement' Implied
4 Agreement; And Malicious Abuse of Process; (2) For Summary
5 Judgment Setting Aside Deeds of Real Property and Assignment of
6 LLC Interest; And (3) For Permission to Submit Points and
7 Authorities in Excess of 30 Pages Pursuant to EDCR 5.503(E);

- 8 • September 6, 2019, Dr. Michaels filed her Reply to Mr. Pickens
9 Opposition and Opposition to Counter-motion;
10 • September 10, 2019, Judge Hughes issued a Minute Order Advising
11 that the court would not reconsider or reverse its previous order
12 denying summary judgment and it vacated the hearings for the
13 motions, setting the first day of Trial. No Order was prepared, signed
14 or filed;
15 • February 14, 2020 was the first day of trial. The next 4 days of trial
16 spanned various interruptions including Covid, various requests of
17 the parties and stipulations of the parties. The trial was resumed on
18 February 21, 2020, March 5, 2021, March 12, 2021 and concluded on
19 April 2, 2021.
20 • August 26, 2020, Dr. Michaels sold the 7608 Lowe Avenue, Las
21 Vegas, Nevada 89131 (APN 125-16-511-008) residence during the
22 pendency of this action. Recorded Document No. 20200826:04179,
23 according to the Clark County Assessor.

24 **THE COURT FURTHER FINDS** that the Court admitted 138 Exhibits
25 and heard testimony of the parties, and the testimony of percipient witnesses
26 including Shannon Evans, Esq., Robert Semonian CPA, Dara Lesmeister, Todd
27 Kilde, and Roberto Carrillo, APRN.

28 **MARITAL STATUS FINDINGS**

THE COURT FINDS the parties met in 2000 when Dr. Michaels became
the treating physician for Mr. Pickens as a result of a hospitalization..

THE COURT FURTHER FINDS that Mr. Pickens and his then wife both

1 used Dr. Michaels as their primary care physician.

2 **THE COURT FURTHER FINDS** that following his divorce from his
3 second wife, Mr. Pickens and Dr. Michaels began dating in late 2001, after which
4 they moved in together on or about September, 2001.

5 **THE COURT FURTHER FINDS** that seven (7) months later Mr. Pickens
6 and Dr. Michaels had a church ceremony in Bratislava, Slovakia on April 7, 2002.
7 The ceremony was held in a Catholic Church. The document memorializing the
8 event was not signed by either party. The church document was never registered
9 with the government of Slovakia pursuant to their laws and/or procedures
10 rendering it unenforceable in Slovakia and not enforceable in Nevada.

11 **THE COURT FURTHER FINDS** credible the initial reason for the trip
12 was to celebrate Dr. Michaels' brother's birthday per her testimony and to
13 introduce Mr. Pickens to her family and friends. In addition, Dr. Michaels testified
14 that her parents were concerned that she was living outside of marriage with Mr.
15 Pickens. This is also credible. She further testified that he did not want to be
16 referred to as her "boyfriend" so they agreed on a commitment ceremony to enable
17 them to refer to each other as husband and wife.

18 **THE COURT FURTHER FINDS** the parties did take pictures at the
19 ceremony and sent out announcements after the ceremony. (See Exhibit 1). Their
20 participation in the ceremony was with the full knowledge that they did not intend
21 to legally marry each other. Dr. Michaels testified that her divorce experience
22 regarding a prior marriage was bad and she did not want to go through that
23 situation again. She also testified that Mr. Pickens understood her position
24 completely. Her testimony regarding the couple's agreement not to marry is
25 credible.

26 **THE COURT FURTHER FINDS** that Mr. Pickens testified that he
27 believed he and Dr. Michaels were legally married in the Bratislava Catholic
28

1 Church ceremony on April 7, 2002. Mr. Pickens testified that he intended to be
2 legally married to Dr. Michaels. In planning for the ceremony, the parties selected
3 rings, made travel arrangements, made hotel arrangements, set up a photographer,
4 purchased a dress for Dr. Michaels for the ceremony and invited guests. In order
5 to participate in the ceremony in the Catholic Church in Bratislava, parties were
6 first required to meet with a Priest to receive a blessing and have pre-marriage
7 instruction in Las Vegas. According to Mr. Pickens, Dr. Michaels arranged for the
8 meeting with the Priest in Las Vegas. According to Dr. Michaels, Mr. Pickens
9 acquired the document. As neither person is catholic, the court is hard pressed to
10 believe the document was legitimate. The letter was never produced.

11 **THE COURT FURTHER FINDS** that Mr. Pickens testified the wedding
12 was a formal marriage ceremony, and Dr. Michaels translated the ceremony for
13 him as he did not speak the language the Priest used while officiating. Following
14 the ceremony, Mr. Pickens testified he and Dr. Michaels signed a book at the
15 church. The overwhelming information points to a ceremony to merely appear
16 married. Mr. Pickens' claim that he did not understand what was being said is not
17 a factor under the circumstances herein.

18 **THE COURT FURTHER FINDS** that the parties referred to each other as
19 spouses to multiple individuals. The parties celebrated their anniversary every
20 April 7th thereafter until they separated in September of 2016.

21 **THE COURT FURTHER FINDS** that Mr. Pickens' testimony that they
22 agreed to a wedding in Slovakia to slow down discovery of creditors is not
23 credible. The parties purchased real property, held title and recorded the property
24 as a married man and a married woman. Their marital status would have been
25 easily discoverable by anyone.

26 **THE COURT NOTES** that there was no clear testimony or evidence
27 presented that Mr. Pickens had any assets to protect from attacks by creditors at the
28

1 time of the ceremony. The only information gleaned by the court was that he came
2 into the relationship with Dr. Michaels in heavy debt while paying spousal support
3 to his ex-wife. He possessed an old car and some furniture. Additional testimony
4 revealed that she paid most of the expenses, the down payment on the real estate
5 properties and the Patience One building. She also financed entertainment and
6 vacations for the couple.

7 **THE COURT FURTHER FINDS** that Mr. Pickens' argument that Dr.
8 Michaels' testimony changed in an attempt to undo the unequivocal testimony she
9 offered on Day One of trial is not supported by the record as a whole. Her "yes"
10 and "no" answers to questions posed by Mr. Pickens' attorneys on direct
11 examination were expounded upon during her testimony on cross and her case-in-
12 chief.

13 **THE COURT FURTHER FINDS** Mr. Pickens' testimony that he was
14 unaware of a legal impediment to the marriage until such time as he filed this
15 action and his lawyer obtained an expert opinion, is not credible. If true, it does
16 not explain all the tax returns and estate planning documents he filed as a single,
17 unmarried man. In fact, five (5) months prior to filing his initial complaint for
18 divorce Mr. Pickens purchased real property as a single, unmarried man. His
19 conduct was expressly contrary to his belief that he was married until after he filed
20 for divorce.

21 **THE COURT FURTHER FINDS** that the parties' joint effort to appear
22 married in social settings was a fraud on their family and friends, but in this case it
23 does not rise to the level of proof of marriage.

24 25 **PUTATIVE SPOUSE STATUS FINDINGS**

26 **THE COURT FURTHER FINDS** the parties shared an accountant, Robert
27 Semonian, CPA.
28

1 **THE COURT FURTHER FINDS** that Witness Semonian, CPA, testified
2 that Mr. Pickens told him that he and Dr. Michaels were not legally married. He
3 further testified that the issue of marital status was discussed every year during tax
4 season. Witness Semonian's testimony was credible.

5 **THE COURT FURTHER FINDS** that each year, between 2002 and 2015,
6 Mr. Pickens and Dr. Michaels filed their federal income tax returns and
7 confirmations verifying their tax status as individual, unmarried persons. These
8 are sworn documents, signed under oath pursuant to federal law. They did not
9 testify that they executed the documents pursuant to fraud, duress or coercion,
10 leaving the Court to deduct that they signed freely, voluntarily and with full
11 knowledge and understanding of the contents of the documents and their legal
12 significance 13 years in a row.

13 **THE COURT FURTHER FINDS** that the parties filed tax returns as
14 single, unmarried persons, rather than married, filing jointly or married, filing
15 separate, for 13 years during their relationship. The testimony of Robert Semonian,
16 was that until 2016, each year, he would apportion the income of and deductions of
17 the parties to each party's individual returns such that both parties would legally
18 avoid as much tax as possible. *See* Transcript Re: Non-Jury Trial dated February
19 21, 2020, page 82, lines 4-14.

20 **THE COURT FURTHER FINDS** that the testimony of witness Robert
21 Semonian further corroborates that Mr. Pickens and Dr. Michaels held themselves
22 out as husband and wife for social purposes.

23 **THE COURT FURTHER FINDS** that testimony was given that witness
24 Dara Lesmeister, who worked with Mr. Pickens and who also knew Dr. Michaels,
25 believed the parties were husband and wife. The Court finds her testimony
26 plausible, as she was in the social setting wherein the parties were holding
27 themselves out to be a married couple.
28

1 **THE COURT FURTHER FINDS** that Mr. Pickens' long-time friend,
2 Todd Kilde, testified that shortly after the ceremony in Slovakia, Mr. Pickens told
3 Mr. Kilde that he and Dr. Michaels were not legally married. His testimony is
4 contradicted by his statement to the Division of Unemployment giving Dr.
5 Michaels the status of Mr. Pickens' wife. See **Exhibit "156"** (Mr. Kilde's Request
6 to Appeal the Denial of Unemployment Benefits wherein he referred to Dr.
7 Michaels as Mr. Pickens' wife).

8 **THE COURT FURTHER FINDS** that the testimony of Shannon Evans,
9 Esq., who represented both parties for estate planning during the relationship, was
10 credible when she testified that Mr. Pickens informed her that he and Dr. Michaels
11 were not legally married, even though they held themselves out to be a married
12 couple.

13 **THE COURT FURTHER FINDS** witness Evans, ESQ. was initially hired
14 by Mr. Pickens to prepare estate planning documents on his behalf. The estate
15 planning documents, executed in 2012, confirmed that Mr. Pickens was unmarried.
16 Mr. Pickens executed his estate planning documents without any fraud, duress, or
17 coercion and did so freely, voluntarily and with full knowledge and understanding
18 of the contents of the documents and their legal significance.

19 **THE COURT FURTHER FINDS** that witness Evans, ESQ., represented
20 only Dr. Michaels on September 13th, 2016 and thereafter. Additionally, Mr.
21 Pickens signed a waiver of conflict to that effect.

22 **THE COURT FURTHER FINDS** that Mr. Pickens' testimony that he
23 believed he was married to Dr. Michaels is not credible as his actions in 2016 do
24 not support his statements in court.

25 **THE COURT FURTHER FINDS** that Mr. Pickens had been married and
26 divorced prior to engaging in his relationship with Dr. Michaels. His current
27 conduct at the close of this relationship in dividing property without benefit of a
28

1 divorce complaint or decree of divorce, together with signed documents under oath
2 the he was a single, unmarried man during the relationship, belies his belief that he
3 thought he was married. Filing the Second Amended Complaint, which excluded
4 the claim for divorce, along with testimony and evidence presented makes it moot
5 for this court to consider the requested relief and serves to solidify the court's
6 finding that Mr. Pickens did not believe he was actually married to Dr. Michaels
7 through intent or otherwise. Mr. Pickens even testified that he and Dr. Michaels
8 were "basically" married. Mr. Pickens initially filed for divorce and maintained
9 that position in his First Amended Complaint. He dropped the claim for Divorce in
10 his Second Amended Complaint.

11 **THE COURT FURTHER FINDS** that Mr. Pickens' contradictory
12 positions on whether or not he was married leads the Court to question his candor
13 with the court in light of his conduct, his pleadings and his testimony.

14
15 **DOCTOR/PATIENT FIDUCIARY DUTY FINDINGS**

16 **THE COURT FURTHER FINDS** that Dr. Michaels did testify she was
17 Mr. Pickens' primary care physician from 2000 to 2017. She also testified that he
18 refused to acquire another treating physician, so she was between a rock and a hard
19 place in her duty to do no harm.

20 **THE COURT FURTHER FINDS** that after the Doctor-Patient relationship
21 began, the parties engaged in a romantic relationship primarily initiated by Mr.
22 Pickens. Dr. Michaels testified this began in the summer of 2001, and that she
23 continued being Mr. Pickens' physician after the romantic relationship
24 commenced.

25 **THE COURT FURTHER FINDS** that it takes judicial notice of the
26 following law pursuant to NRS 47.130:

- 27 1. NAC 630.230 prohibits physicians from failing to adequately supervise
28

1 APRN's in their employ.

2 2. NRS 630.301 makes it grounds for discipline for a physician to engage in
3 sexual relations with a patient.

4 NRS 630.301 makes it a ground for discipline for a physician to exploit a
5 relationship with a patient for financial or other personal gain.

6 **THE COURT HEREBY NOTES** that is not a criminal or disciplinary
7 hearing.

8 **THE COURT FURTHER FINDS** that as a result of the Doctor-Patient
9 relationship, Dr. Michaels could have been held a fiduciary duty to Mr. Pickens as
10 long as the doctor/patient relationship existed under certain circumstances.
11 Testimony revealed that Dr. Michaels advised Mr. Pickens that she would no
12 longer be his primary care physician once an intimate relationship had developed.

13 **THE COURT FURTHER FINDS** that NRS 630.031 provides it is grounds
14 for discipline of physicians if they engage in a sexual relationship with a patient or
15 if they exploit a patient for their own financial gain. According to the parties, their
16 intimate (sexual) relationship ended in 2004, however, they remained a couple and
17 partners for an additional 14 years until 2016. The Court is not aware of any
18 potential disciplinary proceeding initiated by Mr. Pickens against Dr. Michaels for
19 violation of any statute or administrative code involving their doctor/patient
20 relationship.

21 **THE COURT FURTHER FINDS** that the crux of the relationship between
22 Mr. Pickens and Dr. Michaels was their partnership and business pursuits, and not
23 on the need of this patient for this doctor.

24 **THE COURT FURTHER FINDS** that Mr. Pickens transferred the
25 responsibility of his medical coverage to the nurse practitioner working in Dr.
26 Michaels' practice as his medical provider. Other than Dr. Michaels prescribing
27 Mr. Pickens the occasional prescription and seeing him for cross-coverage when
28

1 the nurse was unavoidably unavailable, Roberto Carrillo, A.P.R.N., F.N.P., became
2 Mr. Pickens primary care provider who was responsible for his care and
3 prescriptions beginning in 2008. Mr. Carrillo is able to independently see and treat
4 patients, and prescribe for them, under his own license.

5 **THE COURT FURTHER FINDS** that Dr. Michaels began prescribing
6 medication to Mr. Pickens beginning in 2001, including Xanax, Ambien,
7 Oxycodone and Tramadol, and **Exhibit "4"**, the Nevada Prescription Monitoring
8 Program log for Mr. Pickens dated 2015-2017 proves Dr. Michaels or Mr. Carrillo,
9 APRN, (Mr. Carrillo's primary care provider) continued to prescribe Mr. Pickens
10 medication until 2017. Dr. Michaels later clarified that after 2008 she was only
11 involved if cross coverage was necessary.

12 **THE COURT FURTHER FINDS** that Mr. Pickens was treated for gout,
13 anxiety, cholesterol, and high blood pressure at various points during the
14 relationship.

15 **THE COURT FURTHER FINDS** that pursuant to Nevada law, Dr.
16 Michaels is and was required to supervise her Nurse Practitioner, Mr. Carrillo,
17 APRN. Dr. Michaels' testimony confirmed she did, in fact adequately supervise
18 Roberto Carrillo, a Registered Nurse Practitioner working within her medical
19 practice.

20 **THE COURT FURTHER FINDS** that Mr. Pickens was also seeing his
21 cardiologist care center, a rheumatologist, an orthopedic doctor, two GI doctors
22 and an Ear, Nose and Throat doctor during the course of their relationship.

23 **THE COURT FURTHER FINDS** that in 2016, the year of the separation,
24 save and except for a single refill in May 2016 by Dr. Michaels, (which was filled
25 after speaking with Mr. Carrillo), all prescriptions and visits by Mr. Pickens were
26 handled by Mr. Carrillo.

27 **THE COURT FURTHER FINDS** that it was Mr. Pickens who had to
28

1 prove by a preponderance of the evidence that Dr. Michaels “violated her fiduciary
2 responsibilities” to him. He needed to show that the doctor held a superior
3 authoritative position in the relationship and that, as a result of his illness, Mr.
4 Pickens was vulnerable. He further was required to show that Dr. Michaels
5 exploited that vulnerability.

6 **THE COURT FURTHER FINDS** that Mr. Pickens never made a claim
7 that he was emotionally unstable due to his illness.

8 **THE COURT FURTHER FINDS** that the fact Dr. Michaels referred Mr.
9 Pickens to a specialist in September of 2017 is of no consequence as there was no
10 known romantic relationship, transactions, partnership or pending lawsuits filed to
11 alert Dr. Michaels of an existing duty after the 2016 transfers.

12 **THE COURT NOTES** that there was no professional expert witness
13 presented to show that Mr. Pickens suffered from an illness, treated by Dr.
14 Michaels that rendered him unable to tend to his own business without the aid or
15 assistance of Dr. Michaels.

16 **THE COURT FURTHER FINDS** that Mr. Pickens’ assertion that he
17 lacked capacity fails as he presented no evidence that his emotional state was
18 fragile because of Dr. Michaels’ actions, without whom he could not manage his
19 affairs. The facts show that Mr. Pickens was capable of spending extended periods
20 of time away from Dr. Michaels without incident. He also managed a construction
21 management business where he preformed oversight on large construction projects.

22 **THE COURT FURTHER FINDS** that Mr. Pickens offered to transfer the
23 real properties to Dr. Michaels and the “Assignment” to Dr. Michaels’ Trust while
24 he was in Florida. He then traveled to Nevada, and several days later, he signed
25 off on the transfers he initiated. Dr. Michaels did not have access or opportunity to
26 abuse her position as a doctor to influence his decision.

27 **THE COURT FURTHER FINDS** that Dr. Michaels had no duty owed to
28

1 Mr. Pickens, neither doctor/patient nor spousal, when considering his request to set
2 aside the property transfers and the "Assignment" on September 13, 2016.

3
4 **PARTNERSHIP STATUS**

5 **THE COURT FURTHER FINDS** that credible evidence was presented
6 demonstrating that the parties did behave as partners with regard to some
7 properties and investments.

8 **THE COURT FURTHER FINDS** that the conduct of the parties regarding
9 their financial affairs provides evidence that the parties intended to pool their
10 assets, financial support and management skills when they saw fit to do so. (Living
11 expenses, residential needs, business with regard to Patience One, LLC and for a
12 limited time Blue Point Development and Consulting, Corp.)

13 **THE COURT FURTHER FINDS** the parties had one joint bank account
14 (*see Exhibits "72", "76", "78", "79" and "80"*), while maintaining separate
15 accounts in their own names. The joint account was held first at Bank of America
16 and was moved to Wells Fargo. The stated purpose of the account was to pay
17 household bills, mortgages and business expenses. Mr. Pickens testified he asked
18 for loans from Dr. Michaels. He did not testify that he had equal, community
19 property rights to all her assets.

20 **THE COURT FURTHER FINDS** that Mr. Pickens deposited his income
21 from his business, and the income paid to him by Dr. Michaels' business, into the
22 parties' joint account at Wells Fargo, and that Dr. Michaels deposited her income
23 from her medical practice into the same joint checking account. Dr. Michaels also
24 wrote additional checks to cover her half of the expenses pursuant to any
25 unsupported request from Mr. Pickens.

26 **THE COURT FURTHER FINDS** that during the course of the parties'
27 relationship, specifically in 2014, when Mr. Pickens' company received a
28

1 \$1,000,000.00 bonus on a project, that Mr. Pickens deposited over \$200,000.00 of
2 said bonus into the parties' joint bank account, and further testified that those funds
3 were used to pay for extensive renovations and improvements on the Queen
4 Charlotte home.

5 **THE COURT FURTHER FINDS** that during the course of the parties'
6 relationship, Mr. Pickens paid off, from his earnings or from the funds in the
7 parties' joint account, the mortgage on the Lowe residence. The bank statements
8 and Mr. Pickens' testimony support this finding, unfortunately there was no
9 forensic accounting presented to the court to verify the effect of the mortgage
10 payoff or the various deposits made by the parties or on the respective parties'
11 interests.

12 **THE COURT FURTHER NOTES** that the parties did testify that while
13 they paid their joint household bills and mortgages from the joint account, and that
14 they both placed funds into the joint account from their earnings, there was no
15 accounting, forensic or otherwise to show that one party or another put more than
16 their fair share into the joint account to cover those expenses. As the parties did
17 not extrapolate on the terms under which they closed the joint account in the
18 summer of 2016, the court can only surmise that the closure terms were acceptable
19 to both. Without further information it can only be assumed that any funds placed
20 in the joint account was a gift, one to the other, and to cover their necessary living
21 expenses.

22 **THE COURT FURTHER FINDS** the parties shared at least one credit card
23 account (*see Exhibits "82" - "90"*), while the parties had other lines of credit in
24 their own names. Evidence at trial revealed the continued use by Dr. Michaels of
25 Mr. Pickens' credit card to purchase supplies for her medical practice even after
26 the September 13, 2016 "transactions", discussed below. Once again, there was no
27 accounting, forensic or otherwise, as to the charges and payments made on the
28

1 credit card.

3 REAL PROPERTY

4 THE COURT FURTHER FINDS the parties acquired two residential real
5 properties together. They acquired the residential property where they lived
6 together located at 9517 Queen Charlotte Drive, Las Vegas, Nevada 89145, in
7 2004. The title on the Deed indicates "Dr. Danka Michaels, a married woman and
8 Thomas Pickens, a married man..." (See Exhibit "7"). The mortgage was in both
9 parties' names. Dr. Michaels sold her separate property residence and placed the
10 proceeds down on the purchase. The parties also purchased an investment property
11 located at 7608 Lowe Avenue, Las Vegas, Nevada 89131 (see Exhibit "6"), as
12 Husband and Wife, and again, the mortgage on the investment property was in
13 both parties' names. Dr. Michaels placed \$29,000 down on the purchase. The
14 mortgage on the investment was paid in full before the parties separated.

15 THE COURT FURTHER FINDS that on or about September 13, 2016,
16 Mr. Pickens signed documents transferring his interest in the two residential real
17 properties owned jointly by the parties. The transfers involved two steps. First the
18 parties had to change the titles to the real properties from being held incorrectly as
19 husband and wife, to being held by two single unmarried persons, then a second
20 signing changing the properties from held as two single unmarried persons jointly,
21 to Dr. Michaels as a single unmarried woman.

23 INVESTMENT AND BUSINESS HOLDINGS

24 THE COURT FURTHER FINDS that Mr. Pickens and Dr. Michaels
25 founded Blue Point Development & Construction as an "S" Corp., in 2002.
26 Testimony showed that Dr. Michaels provided the seed money of \$30,000.00 to get
27 the business off the ground. Both parties held a 50% interest in the business.

1 **THE COURT FURTHER FINDS** that Mr. Pickens, as the resident agent
2 let the company fall into default with the Secretary of State and the entity was
3 revoked. Mr. Pickens then transferred all assets of the Blue Point Development &
4 Construction into a new business, Blue Point Development, Inc., and held the
5 business in his name alone.

6 **THE COURT FURTHER FINDS** the parties acquired the Patience One
7 real property and the "buffalo" building for investment purposes. They formed the
8 company Patience One, LLC and placed the investment property, the "buffalo"
9 building, as an asset of the LLC. Each party operated their respective businesses
10 out of this building. (Dr. Michaels' medical practice and her health spa; Mr.
11 Pickens' business Blue Point Development, Inc., both occupied their own
12 independent suites).

13 **THE COURT FURTHER FINDS** that the Patience One Building was
14 acquired in 2012. Dr. Michaels provided the 10% down payment for the property
15 and Mr. Pickens used his skill and professional contacts for the new building
16 tenant improvements. The parties each held a 50% membership in the LLC. The
17 parties acted as if this was a joint venture. Evidence of this fact is found in
18 Schedule K-1's issued by Patience One, LLC, **Exhibits "47" – "51"**; Deed of
19 Trust for Patience One, LLC's, 2014 loan, **Exhibit "153"**; and Dr. Michaels' email
20 in which she tells the parties' attorney, Andy Glendon, Esq., that she and her
21 husband (referring to Mr. Pickens) were partners in the Patience One, LLC deal
22 which held and managed the "buffalo" building.

23 **THE COURT FURTHER FINDS** that Dr. Michaels admitted during her
24 testimony that they both were guarantors on the original mortgage :buffalo"
25 building and on the subsequent 2014 refinance. (*see* **Exhibit "153"**).

26 **THE COURT FURTHER FINDS** that at all times relevant to the
27 September 13, 2016 transaction, the parties were equal members of the Nevada
28

1 Limited-Liability Company, Patience One, LLC.

2 **THE COURT FURTHER FINDS** that Mr. Pickens voluntarily executed an
3 Assignment and Assumption of Membership Interest in the LLC [the
4 "Assignment"], from his LV Blue Trust [Mr. Pickens' estate planning trust] to the
5 Mich-Mich Trust [Dr. Michaels' estate planning trust] regarding his 50% interest
6 in Patience One LLC. The "Assignment" read:

7 a. WHEREAS, Assignor owns a 50% interest in Patience One, LLC,
8 a Nevada Limited Liability Company (LLC), which was formed
9 pursuant to the Articles of Organization dated MY [sic] 9, 2012
10 (the "Articles"); and

11 b. WHEREAS, Assignor desires to assign for good and valuable
12 consideration, all if its right title, duties, obligations and interest in
13 and to the 50% interest in the LLC to Assignee.

14 **THE COURT FURTHER FINDS** that pursuant to the K-1's of Patience
15 One, LLC, the parties owned their respective membership interests in Patience
16 One, LLC as individuals (*see Exhibits "47" – "50"*). It was not until after the
17 September 13, 2016 transaction that the K-1 of Patience One, LLC reflected the
18 Mich-Mich Trust was the owner of Dr. Michaels' interest in Patience One, LLC
19 (*see Exhibit "51"*).

20 **THE COURT FURTHER FINDS** that the only going business wherein
21 both parties held interests at the time of the September 13, 2016 transfer was the
22 Patience One, LLC. There was no evidence presented that Mr. Pickens had an
23 interest established in Dr. Michaels medical practice or spa, save and except for his
24 salary and his IRA account paid out of her business. There was no evidence
25 presented that Dr. Michaels had any interest in Blue Point Development, Inc.

26 **THE COURT FURTHER FINDS** that the transfer of Mr. Pickens' interest
27 in Patience One, LLC by the "Assignment" prepared by Shannon Evans
28

1 transferring Mr. Pickens' interest in Patience One, LLC, reflects Mr. Pickens'
2 Trust, LV Blue Trust, as the transferor. Testimony by Mr. Pickens indicated Mr.
3 Pickens Trust did not own his personal 50% interest in Patience One LLC when he
4 signed the transfer document. No evidence was presented that Mr. Pickens' Trust
5 ever owned his individual interest in Patience One, LLC, however, Dr. Michaels
6 relied on the representation by Mr. Pickens through his signature on the above
7 noted "Assignment," that he HAD placed his 50% interest in his trust. There was
8 no testimony or evidence provided that Mr. Pickens corrected the document to
9 reflect the actual owner, himself as an individual, at the time of the transfer or
10 since.

11 **THE COURT FURTHER FINDS** that to date, there has been no recording
12 of a satisfaction of the original Patience One, LLC Mortgage on the Clark County
13 Recorder's website. (See request for judicial notice filed 4/23/21). Testimony at
14 trial revealed that Dr. Michaels and the Mich-Mich Trust, in reliance on the
15 "Assignment," re-financed the "buffalo" building held by Patience One, LLC and
16 made improvements to the property after the interest was transferred to her. The
17 guarantors on the "buffalo" building are now Dr. Michaels, personally, and the
18 Mich-Mich trust, which holds the LLC.

19 **THE COURT FURTHER FINDS** that even if the parties were married or
20 that Mr. Pickens was a putative spouse, NRS 123.080 permits spouses to alter their
21 legal relations as to property.

22 **THE COURT FURTHER FINDS** that no interest in any other company or
23 joint asset was transferred by Dr. Michaels to Mr. Pickens in exchange for the
24 September 13, 2016 transfer of assets received by Dr. Michaels.

25 **THE COURT FURTHER FINDS** that Mr. Pickens received no tangible
26 consideration from Dr. Michaels for the above transfers of real property and his
27 interest in Patience One, LLC.

28

1 **THE COURT FURTHER FINDS** that subsequent to the Assignment, the
2 new managers of Patience One, LLC refinanced the loan. Under the new
3 ownership, Patience One, LLC refinanced the "buffalo" property with Danka and
4 the Mich-Mich Trust serving as personal guarantors. Because the Deed of Trust is
5 in the name of Patience One, LLC, it was not necessary for a new Deed of Trust to
6 be recorded in order to remove Mr. Pickens from the obligation.

7 **THE COURT FURTHER FINDS** that Mr. Pickens received valuable
8 consideration when he was indemnified from a great deal of debt as to the transfer
9 of his interest in Patience One, LLC to Dr. Michaels. By executing the
10 Assignment, divesting himself completely from Patience One, LLC, which resulted
11 in a refinance of the loan on the "buffalo" building to which neither Tom nor his
12 Trust were now parties, there is no more legal basis under which Mr. Pickens could
13 be held personally liable for the responsibility for the Patience One, LLC debts.

14 **THE COURT FURTHER FINDS** that Mr. Pickens was also able to
15 assuage his self-imposed guilt for engaging in an affair with a woman,
16 impregnating her, and revealing a significant secret about Dr. Michaels' childhood
17 to his new significant other. Consideration is a legal term of art. Mr. Pickens had
18 inquired whether the transactions could be reversed in a couple years if they were
19 to reconcile. The record does not reflect that the parties shared a meeting of the
20 minds on this point. Additionally, there was no testimony that an attempt for
21 reconciliation had been initiated by either party.

22 **THE COURT FURTHER FINDS** that once the transfer documents were
23 executed, the parties performed their agreements; e.g., Mr. Pickens vacated the
24 Queen Charlotte property, he transferred the leases and control of rent collection
25 for Patience One, LLC to Dr. Michaels. Additionally, Mr. Pickens paid rent each
26 month for the space his company, Blue Point Development, occupied in the
27 "buffalo" building. When he ceased making his rental payment, Dr. Michaels had
28

1 him evicted. The Court does not know the legal procedure to evict an owner from
2 his own property.

3 **THE COURT FURTHER FINDS** that Mr. Pickens also exhausted his IRA
4 which he acquired as an employee for Dr. Michaels and purchased his current
5 residence as a single unmarried man five (5) months prior to filing the initial
6 underlying complaint.

7 **THE COURT FURTHER FINDS** that rescission to set aside the transfers
8 of real property and to set aside the "Assignment" is an equitable remedy. Laches
9 is a defense to a set aside. The delay between the transfers of real property and the
10 "Assignment" spanned from September 13, 2016 to October 24, 2017. It is
11 undisputed that more than 1 year passed before Mr. Pickens filed his complaint.
12 His first request for equitable relief was filed March 22, 2018. During that time
13 Dr. Michaels entered into transactions which she would not have entertained had
14 Mr. Pickens filed his complaint prior to entering into the transfers and the
15 Assignment on September 13, 2016.

16 **THE COURT FURTHER FINDS** that Dr. Michaels engaged in
17 transactions to re-finance, pay down loans and mortgages, improve property,
18 and/or sell property in reliance on the September 13, 2016 transfers from Mr.
19 Pickens to her and the Mich-Mich Trust.

20 21 **MISCELLANEOUS ASSETS**

22 **THE COURT FURTHER FINDS** that Blue Point Development, Inc. was
23 formed during the relationship of the parties, and that Dr. Michaels testified during
24 the course of trial that she is asserting an ownership claim to Mr. Pickens'
25 company, Blue Point Development, in a pending civil lawsuit between the parties.

26 **THE COURT FURTHER FINDS** that both parties acquired retirement
27 accounts during their relationship.
28

THE COURT FURTHER FINDS both parties acquired an interest in, and deposited earnings into, various bank accounts during their relationship.

THE COURT FURTHER FINDS that Mr. Pickens purchased the Porsche Cayenne vehicle from his 2014 bonus, which Dr. Michaels, to this day, continues to drive. Dr. Michaels testified that she was surprised by the car and told Mr. Pickens at the time that she did not need the car. Mr. Pickens testified the car was a Christmas/Birthday present for Dr. Michaels.

THE COURT FURTHER FINDS that Mr. Pickens received his company, Bluepoint Development, Inc., free from transfer of any value to Dr. Michaels. There was no evidence presented in this case that Dr. Michaels had any documented ownership interest in the newly formed company. The company was resurrected from Blue Point Development and Management Corporation (where Dr. Michaels and Mr. Pickens were documented a co-owners which had fallen into default and its Articles of Incorporation revoked by the Secretary of State of Nevada. The assets, previously acquired from the Blue Point Development and Management Corporation, were transferred into Blue Point Development, Inc., at its formation in 2008.

II

CONCLUSIONS OF LAW

Based upon the forgoing findings of fact, the Court makes the following conclusions of law:

1. As a matter of comity, Nevada's recognition or non-recognition of a purported foreign marriage depends on its legality in the foreign country. *Gonzales-Alpizar v. Griffith*, 130 Nev. 10, 317 P.3d 820 (2014) quoting *Mianecki v. Second Judicial Dist. Court*, 99 Nev. 93, 98, 658 P.2d 422, 424-25 (1983). Since the parties did not follow the

1 procedures in Slovakia, no legal marriage can be found in Nevada
2 courts.

- 3 2. The Court found no credible intent by either Mr. Pickens or Dr.
4 Michaels to legally marry, taking the evidence and testimony as a
5 whole, it therefore follows that there was no marriage. See e.g., *In re*
6 *JKNA*, 454 P.3d 642, 650 Mont. 2019), *Callen v. Callen* 620 S.E. 2nd
7 59 (SC 2005), *Renshaw v. Heckler*, 787 F.2nd 50 (2ns Cir. 1986);
8 *McNee v McNee*, 49 Nev. 90, 237 P. 534 (1925); NRS 010.
- 9 3. Mr. Pickens did not have a credible, good faith belief that he was
10 legally married to Dr. Michaels and there was no prior legal
11 impediment; as such, Mr. Pickens is not a putative spouse under
12 *Williams v. Williams*, 120 Nev. 559, 97 P.3d 1124 (2004).
- 13 4. Pursuant to Nevada law, spouses owe a fiduciary duty to one another.
14 See *Williams v. Waldman*, 108 Nev. 466 (1992). Since the parties
15 were not legally married, this duty does not apply.
- 16 5. Mr. Pickens must prove the existence of a physician-patient
17 relationship before a fiduciary duty can be established. See *Jennings*
18 *v. Badget*, 2010 OK 7, 230 P.3d 861, 865-866 (Okla. 2010); *Mead v.*
19 *Legacy Health System*, 352 Ore. 267, 283 P.3d 904, 909-910 (Ore.
20 2010); *Seeber v. Ebeling*, 36 Kan. App. 2d 501, 141 P.3d 1180 (Kan.
21 Ct App. 2006); *St. John v. Pope*, 901 S.W. 2d 420, 423 (Tex. 2005);
22 *Gross v. Burt*, 149 S.W. 3d 213 (Tex. Ct. App 2004); *Millard v.*
23 *Corrado*, 14 S.W.3D 42, (Mo. Ct. App. 1999); *Roberts v. Hunter*, 310
24 S.C. 364, 426 S.E.2D 797 (S.C. 1993). Mr. Pickens failed to establish
25 that he and Dr. Michaels were in a physician-patient relationship at
26 the time of the execution of the transfer of documents. As such, Dr.
27 Michaels did not owe Mr. Pickens any fiduciary duty.

- 1 6. Pursuant to Nevada law, a physician is required to supervise any
2 APRN in their employ. See NAC 630.230. There is no finding by the
3 court that Dr. Michaels violated her duty of supervision.
- 4 7. Pursuant to Nevada law, a physician is precluding from taking
5 advantage of a patient for their own financial gain. See NRS 630.301.
6 The Court did not find that Mr. Pickens was impaired to the extent
7 that he could not manage his financial circumstances on an equal
8 footing with Dr. Michaels. Additionally, the parties both prospered
9 during their partnership between 2002 and 2016 when their
10 relationship fell apart.
- 11 8. Even if Mr. Pickens was able to establish a physician-patient
12 relationship and the corresponding fiduciary duties applied, he must
13 still prove that such duties were breached. *Hoopes v. Hammargren*,
14 102 Nev. 425 (1986). Further, Mr. Pickens must have also proved
15 that he was vulnerable and unstable due to his medical problem and,
16 that due to his reliance on Dr. Michaels' medical skills being retracted
17 he was taken advantage of by Dr. Michaels. Vulnerability is an
18 essential and necessary element of a confidential relationship.
19 *Richelle L. v. Roman Catholic Archebishop*, 106 Cal. App. 4th 257,
20 270-72, 130 Cal. Rptr. 2d 601 (Cal. Ct. App. 2003). Mr. Pickens
21 failed to prove any such relationship, vulnerability, or breach.
- 22 9. Pursuant to Nevada law, parties to a joint venture owe a fiduciary duty
23 to one another. (*See Leavitt v. Leisure Sports Inc.*, 103 Nev. 81
24 (1987). There was no evidence presented that either party kept the
25 other party in the dark regarding any aspect of the transfer of property
26 and assets, to and including the value of same. [With the exception of
27 Mr. Pickens' lack of candor when signing the "Assignment"
28

1 document without correcting the document to reflect the actual holder
2 of the 50% membership was himself as an individual and not his
3 Trust]. Testimony showed that Mr. Pickens was in charge of the
4 payments made from the joint account, including the payments on the
5 American Express account. He was also informed as to the tax basis
6 for the preparation of the tax documents.

- 7 10. Nevada law recognizes the rights of putative spouses to a division of
8 property consistent with community property law when one or both of
9 the parties reasonably believed that the marriage was valid. (See
10 *Williams v. Williams*, 120 Nev. 559 (2004). This point is moot as the
11 court does not find that either party reasonably believed they were
12 married, a putative spouse relationship test cannot be met in this case.
- 13 11. Nevada law recognizes the rights of parties who voluntarily agree to
14 pool their assets and become implied partners to an equal division of
15 the property acquired during their relationship. (See *Western States*
16 *Construction v. Michoff*, 108 Nev. 931 (1987). There was no quasi-
17 marital relationship found by the court. Further, the transfers were for
18 satisfactory value to both parties. Parties, married or not may engage
19 in contracts with each other.
- 20 12. Parties are free to contract, and the courts will enforce their contracts
21 if they are not unconscionable, illegal, or in violation of public policy.
22 *Rivero v. Rivero*, 125 Nev. 410, 216 P.3d 213 (2009). The court finds,
23 under the totality of the circumstances, that the parties engaged in
24 lawful, valid and enforceable contracts on September 13, 2016.
- 25 13. A spouse-to-spouse conveyance of title to real property creates a
26 presumption of gift that can only be overcome by clear and
27 convincing evidence. *Kerly v. Kerly*, 112 Nev. 36 (1996); *Graham v.*
28

1 *Graham*, 104 Nev. 473 (1988); *Todkill v. Todkill*, 88 Nev. 231 (1972);
2 *Peardon v. Peardon*, 65 Nev. 717 (1948). As Mr. Pickens conveyed
3 title to the properties to Dr. Michaels for the purpose of making her
4 less unhappy about the discovery of his conduct in revealing her most
5 personal tragedy to a new significant other, the transfers could be
6 considered as gifts. How much more so when the parties were not
7 married.

8 14. Property acquired by gift during marriage is separate property
9 pursuant to NRS 123.130, and therefore not community property
10 pursuant to 123.220.

11 15. Nevada law recognizes that consideration is a requirement of any
12 valid contract. (*See Manning v. Coryell*, 130 Nev 1213 (2014))
13 Consideration can come in tangible and non-tangible forms. Mr.
14 Pickens testimony that he wanted to be able start fresh in his new life
15 was important to him, as well as his need to assuage his guilty feelings
16 due to his conduct.

17 16. Nevada law recognizes the equitable authority of this Court to correct
18 unjust enrichment. (*See Certified Fire Protection v. Precision*
19 *Construction*, 128 Nev 371(2012)). Testimony and evidence satisfied
20 the court that there was no unjust enrichment by Dr. Michaels. In
21 light of the fact that she supported the couple, without question, off
22 and on throughout the relationship, and that Mr. Pickens ended the
23 relationship on his own terms, the court finds the resolution of their
24 partnership equitable. This finding is not intended to reflect a division
25 based on "dollar-for-dollar," as there was no forensic accountant hired
26 to provide such evidence to the court.

- 1 17. NRS 163.417(2) states that Trust property is not subject to the
2 personal obligations of the trustee, even if the trustee is insolvent or
3 bankrupt. Patience One, LLC, the entity which owned the "buffalo"
4 building, is held by the Mich-Mich Trust where Mr. Pickens directed
5 his 50% membership to be assigned.
- 6 18. Mr. Pickens has not requested rescission as a remedy to cancel the
7 written contracts of transfer of real property and business interest
8 "Assignment."
- 9 19. Mr. Pickens did not name the Mich-Mich Trust as a party to this
10 lawsuit; there was no claim against the Mich-Mich Trust, therefore
11 there is no legal basis for Tom to set aside the Assignment in this
12 matter pursuant to rescission.
- 13 20. According to Mr. Pickens the transfer of his 50% interest in Patience
14 One LLC was not valid or enforceable due to the fact that the
15 purported transfer was from his LV Blue Trust and not Mr. Pickens,
16 the individual. The Court disagrees and finds that the document
17 misstated the actual owner, a fact which could not have been evident
18 to Dr. Michaels at the time of the transfer. Mr. Pickens did not correct
19 the over-sight and led Dr. Michaels to believe he had placed his 50%
20 ownership into his personal trust sometime prior to transferring it to
21 her Mich-Mich Trust. Dr. Michaels then re-financed the building
22 under her authority as the 100% Member of the LLC.
- 23 21. Unmarried cohabitating couples who purchase property titled in both
24 parties' names, with or without the right of survivorship, own the
25 property in proportion to the amounts they each contributed to the
26 purchase price. *Sack v. Tomlin*, 110 Nev. 2014, 871 P.2d 298 (1994);
27 *Langevin v. Langevin*, 111 Nev. 1481, 907 P.2d 981 (1995). The
28

1 testimony of both Mr. Pickens and Dr. Michaels established that Dr.
2 Michaels paid the down payments for the Lowe, Queen Charlotte and
3 Patience One properties. There was conflicting testimony as to the
4 mortgage payments. Mr. Pickens testified that payments towards the
5 mortgage of the Lowe and Queen Charlotte properties were made by
6 him from the joint account ("his" account according to testimony at
7 trial). Dr. Michaels testified that Mr. Pickens would take care of
8 paying the bills from the joint account and had her write a check for
9 her half of the bills to the joint checking account. Mr. Pickens did not
10 present a forensic analysis or tracing to establish the source of funds
11 in that account.

12 22. Mr. Pickens failed to prove any credible theory of Dr. Michaels
13 having breached any fiduciary duty owed from her to him. As a
14 matter of law, the transfers of the Lowe Avenue and Queen Charlotte
15 properties are not void based on a breach of fiduciary duty.

16 23. As a matter of law, all transfers which occurred on September 13,
17 2016, which included the transfer of the Lowe Avenue residence, the
18 Queen Charlotte residence, and Mr. Pickens' interest in Patience One,
19 LLC were not found by the court to be void for want of consideration
20 for the transaction.

21 24. As a matter of law, the Court found evidence of good and sufficient
22 consideration supporting the conclusion that the assets were legally
23 transferred for good cause and now rest with the individual wherein
24 the real property titles and the Assignment are currently being held.

25 26 III. ORDERS AND JUDGMENT

27 Based upon the forgoing Findings of Fact and Conclusions of law, it is
28

1 hereby:

2 **ORDERED, ADJUDGED, AND DECREED** that based on the fact that the
3 religious ceremony did not constitute a valid, legal marriage under the laws of any
4 State, declaratory relief is granted to Dr. Michaels that the parties were never
5 legally married.

6 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that based
7 on the Mr. Pickens knowledge that there was no valid marriage, he is not a putative
8 spouse. As such, he is not entitled to any relief as a putative spouse.

9 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** the two
10 real estate properties now held by Dr. Michaels were transferred to her pursuant to
11 valid transfers by Mr. Pickens for good and sufficient consideration and will not be
12 set aside.

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Dr.
14 Michaels will maintain 100% ownership of Patience One LLC pursuant to the
15 transfer from Mr. Pickens for good and sufficient consideration. The Assignment
16 of Patience One, LLC was a valid transfer and shall not be set aside. To the extent
17 that the paperwork transferring Mr. Pickens' interest to Dr. Michaels erroneously
18 listed his trust and not himself personally as the transferor, said error was clerical
19 in nature and shall be corrected. Mr. Pickens shall execute the appropriate
20 documentation to correct any such error upon presentment.

21 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** the parties
22 will keep any personal property now in their possession as a gift from one to the
23 other based on testimony gathered during trial, the time which elapsed between the
24 parties' closure of their joint accounts and partnership, and the filing of the action
25 herein.

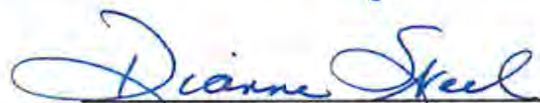
26 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that all
27 other joint assets and obligations of the parties have already been divided and each
28

1 shall retain those assets and obligations in his or her respective names, titles,
2 possession and control.

3 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Dr.
4 Michaels is determined to be the prevailing party in this matter. Dr. Michaels is
5 awarded attorney fees and costs subject to application for the relief and
6 information provided therein. Counsel for Dr. Michaels shall submit the
7 appropriate memorandum of fees and costs setting forth their analysis under
8 *Brunzell* and shall also submit their redacted billing statements in accordance with
9 *Love* within twenty days following the Notice of Entry of Order of the Findings of
10 Fact, Conclusions of Law, and Judgment.

11 **IT IS FURTHER ORDERED** that Defendant shall file Notice of Entry of
12 this Order upon receipt.

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14 **SO ORDERED** this 3rd day of August, 2021.

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18 DISTRICT COURT JUDGE

19 *SR. Judge*
20 *for Department J.*
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FILED

SEP 07 2021

Sherry Justice
CLERK OF COURT

**EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

THOMAS A. PICKENS,) CASE NO. D-17-560737-D
Plaintiff,) DEPT. J
vs.) **SEALED**
DANKA K. MICHAELS,)
Defendant.) **ERRATA**

ESTIMATED COST OF TRANSCRIPT(S)

The office of Transcript Video Services received a request for transcript estimate from Michelle LoBello, Esq., on September 03, 2021, for the following proceedings in the above-captioned case:

MARCH 05, 2021; MARCH 12, 2021; APRIL 02, 2021
(FEBRUARY 14, 2020; FEBRUARY 21, 2020 - previously transcribed.)

for original transcripts and one copy of each.

The estimated cost for the transcripts is \$1900.00. Payment in the amount of **\$1900.00** must be paid directly to **VERBATIM REPORTING & TRANSCRIPTION** prior to work commencing on the transcripts. Please call Verbatim Reporting & Transcription to make deposit payment (281) 724-8600 or (520) 303-7356.

DATED this 7th day of September, 2021.

Sherry Justice
Sherry Justice
Transcript Video Services

Transcript ESTIMATE amount of _____ Direct Pay Invoice # _____

Received this _____ day of _____, 2021.

This is only an **estimate**. Upon completion of transcript(s), a balance may be due, or you may receive a refund of your deposit if overpayment is greater than \$15.00.

NOTE: STATUTORY FEES ARE SUBJECT TO CHANGE PER LEGISLATIVE SESSION.

ITEMS LEFT BEYOND NINETY DAYS ARE SUBJECT TO DISPOSAL WITHOUT REFUND.
COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT.

AA08248

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FILED

SEP 07 2021

Sherry Justice
CLERK OF COURT

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

THOMAS A. PICKENS,) CASE NO. D-17-560737-D
Plaintiff,) DEPT. J
vs.) **SEALED**
DANKA K. MICHAELS,)
Defendant.) **ERRATA**

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Sherry Justice
Sherry Justice
Transcript Video Services

Transcript **ESTIMATE** amount of _____ Direct Pay Invoice # _____

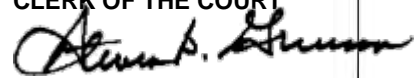
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AA08249



OBJ

JONES & LOBELLO

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Attorneys for Plaintiff,

THOMAS A. PICKENS

**DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

THOMAS A. PICKENS,

Individually and as Trustee of the LV
Blue Trust,

Plaintiff/Counterdefendant,

vs.

DANKA K. MICHAELS,

Individually and as Trustee of the Mich-
Mich Trust,

Defendant/Counterclaimant;

and related Counterclaims.

CASE NO.: D-17-560737-D

DEPT. J

PLAINTIFF'S OBJECTION TO DEFENDANT DANKA K. MICHAELS'
MEMORANDUM OF FEES AND COSTS

Plaintiff, THOMAS ALLEN PICKENS ("Tom"), by and through his attorneys, Jones D. Jones, Michele LoBello and JONES & LOBELLO, hereby files his *Objection to Defendant Danka K. Michaels' Memorandum of Fees and Costs*.