

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

IN THE MATTER OF THE  
GUARDIANSHIP OF THE PERSON  
AND ESTATE OF KATHLEEN JUNE  
JONES, PROTECTED PERSON

KATHLEEN JUNE JONES,

Appellant,

vs.

ROBYN FRIEDMAN; AND DONNA  
SIMMONS,

Respondents.

No. 83967

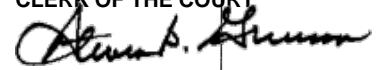
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**RESPONDENTS' APPENDIX  
Volume 6 (Nos. 1031-1089)**

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP )  
OF THE PERSON AND ESTATE OF: )

Kathleen June Jones, )

An Adult Protected Person. )

Case Number: G-19-052263-A

Department: B

Date of Hearing: 03/17/2020

Time of Hearing: 9:30 a.m.

**RESPONSE TO (1) KATHLEEN JUNE JONES' OBJECTION TO PETITION FOR  
APPROVAL OF ATTORNEYS' FEES AND COSTS AND REQUEST TO ENTER  
A JUDGMENT AGAINST THE REAL PROPERTY OF THE ESTATE;  
(2) RESPONSE TO KIMBERLY JONES' JOINDER TO  
OBJECTION TO FRIEDMAN AND SIMMONS' PETITION FOR APPROVAL OF  
ATTORNEYS' FEES AND COSTS AND REQUEST TO ENTER A  
JUDGMENT AGAINST THE REAL PROPERTY OF THE ESTATE; AND (3)**

**RESPONSE TO JOINDER TO OPPOSITION TO PETITION FOR APPROVAL OF  
ATTORNEY'S FEES AND COSTS AND REQUEST TO ENTER A JUDGMENT  
AGAINST THE REAL PROPERTY OF THE ESTATE FILED  
BY RODNEY GERALD YEOMAN**

☐ TEMPORARY GUARDIANSHIP

☐ Person

☐ Estate    ☐ Summary Admin.

☐ Person and Estate

☒ GENERAL GUARDIANSHIP

☐ Person

☐ Estate                      ☐ Summary Admin.

☒ Person and Estate

☐ SPECIAL GUARDIANSHIP

☐ Person

☐ Estate    ☐ Summary Admin.

☐ Person and Estate

☒ NOTICES / SAFEGUARDS

☐ Blocked Account

☐ Bond Posted

☒ Public Guardian Bond

COMES NOW, Robyn Friedman and Donna Simmons (hereinafter "Petitioners") by and through John P. Michaelson, Esq. of Michaelson & Associates, Ltd. and Jeffrey R. Sylvester, Esq. of Sylvester & Polednak, Ltd., who respectfully submit to this Honorable Court their Response to Kathleen Junes Jones' (hereinafter "Ms. Jones") Objection to Petition for Approval of Attorneys' Fees and Costs and Request to Enter a Judgment Against the Real Property ("Kathleen Jones' Objection to Petition for Attorneys' Fees"), Opposition filed by Kimberly Jones ("Kimberly") To Petition for Approval of Attorney's Fees and Costs ("Kimberly's Objection to Attorneys' Fees"); and Joinder In Oppositions to Petition for Approval of Attorney's Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate filed by Rodney Gerald Yeoman ("Gerry's Opposition to Petition For Approval of Attorney's Fees") and represents the following to this Honorable Court:

LEGAL ARUGMENT

***I. Petitioners' Attorney's Fees Incurred Conferred An Actual Benefit Upon The Protected Person and Advanced The Best Interest of the Protected Person.***

1. Counsel for June Jones in their Objection concede that under NRS 159.344(1)-(2) that although a guardian is responsible for the payment of all attorney fees and costs, the court may order payment of attorney's fees and costs from the protected person's estate if the fees are *just, reasonable and necessary* pursuant to NRS 159.344(5).

2. Counsel for June Jones, in determining whether the fees are *just, reasonable and necessary* directs this Court to consider the following pursuant to NRS 159.344(5):

(b) Whether the services conferred any actual benefit upon the protected person or attempted to advance the best interests of the protected person;

...

(i) The extent to which the services were provided in a reasonable, efficient and cost-effective manner, including, without limitation, whether there was appropriate and prudent delegation of services to others;

...

(k) The efforts made by the person and attorney to reduce and minimize any issues;

(l) Any actions by the person or attorney that unnecessarily expanded issues or delayed or hindered the efficient administration of the estate; and

(m) Any other factor that is relevant in determining whether attorney's fees are just, reasonable and necessary, including,

1 without limitation, any other factor that is relevant in  
2 determining whether the person was acting in good faith and was  
3 actually pursuing the best interests of the protected person.

4 3. In addition, counsel for June Jones further argues that the attorney's fees incurred did not  
5 further the best interest of Ms. Jones or confer a benefit upon Ms. Jones as set forth *In the*  
6 *Guardianship of Sleeth*, 244 P.3d. 1169, 226 Ariz. 171 (2010). Contrary to the assumption asserted  
7 by Counsel for June Jones, Petitioners take full responsibility for their attorney's fees incurred in  
8 this case and disagree with the implication that they *may lack incentive to avoid financial*  
9 *improvidence* as set forth in *Sleeth*.

10 4. As stated in paragraph 33, page 13 of Petitioners' Petition for Approval of Attorney's Fees  
11 and Costs and Request to Enter a Judgment Against the Real Property of the Estate ("Petition for  
12 Attorneys' Fees"), Petitioners acknowledge that they are personally liable for payment of  
13 attorney's fees and costs incurred in retaining an attorney to represent them in a guardianship  
14 proceeding. Although counsel for Ms. Jones and counsel for Kimberly Jones allege that the  
15 services performed did not confer an actual benefit to the protected person or advanced the  
16 protected person's best interest, the opposite is true. In addition, counsel for Gerry in its  
17 Opposition to Petition for Attorney's Fees join counsel for Kimberly by arguing *there was no*  
18 *emergency need for the temporary guardianship* and that *[n]either Robyn nor Donna have ever*  
19 *proven any emergency need*. See Gerry's Joinder in Opposition for Attorney's Fees at lines 3-4 on  
20 page 3 of 4. Again, the opposite to this allegation is true, as was clearly confirmed by this Court's  
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1 appointment of Petitioners as temporary guardians and then by the subsequent appointment of  
2 Kimberly as the general guardian. In particular, in granting the temporary guardianship, the court  
3 was very concerned about a lack of access to medication, allegations of “granny snatching”,  
4 potential for violence between the parties, the emotional toll all of this had had on Ms. Jones, the  
5 lack of transparency or information about accounts, the fact that so many assets had been  
6 admittedly lost during Kimberly’s tenure as POA agent, Richard Powell’s intransigence, Gerry’s  
7 unwillingness to provide medical information, the eviction proceedings against Ms. Jones’  
8 caregivers, false reports to Metro and the FBI that the POA agent, Kimberly Jones, had kidnapped  
9 her mother, the fact that Dick Powell and group took Ms. Jones out of state over the objection of  
10 the POA agent Kimberly, and despite being in close contact with Mr. Michaelson about the issue,  
11 the fact that Mr. Kehoe continued to misrepresent Commissioner Yamashita's statements about the  
12 validity of the POA (Commissioner Yamashita specifically said he was not opining on the validity  
13 of the POA’s, but Mr. Kehoe continued to tell people the Commissioner had “concerns” about the  
14 POA’s), Mr. Kehoe openly expressing to the Court and others without basis that he doesn’t respect  
15 the POA’s, Ms. Jones not having access to her clothing, no plan of care in place, no accounting or  
16 inventory filed or otherwise provided by Kimberly Jones despite repeated requests for  
17 transparency and clarification. This issue has been repeatedly raised in pleadings and fully  
18 litigated at length in the hearings and the Court has continued to reject the specious claim that there  
19 was no basis for either the temporary or general guardianship.  
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1 5. As counsel for Ms. Jones, counsel for Kimberly, and counsel for Gerry are fully aware, a  
2 court does not grant a temporary guardianship, absent a finding that a proposed protected person  
3 is unable to respond to a substantial and immediate risk of financial loss, is or has been subject to  
4 abuse, neglect or **exploitation, isolation** or abandonment, and is **in need of** medical attention or  
5 **medication**, as was the case here. At the return hearing on the appointment of temporary guardian,  
6 this Court expressed great concerns over the level of Ms. Jones' healthcare and the possibility of  
7 financial exploitation as Ms. Jones was not being provided her medication, and the transfer of real  
8 property to Gerry's daughter and son-in-law for far less than market value.

9 6. For counsel for Ms. Jones to request that Petitioners' fees incurred *by the temporary*  
10 *guardians both before and after their appointment as temporary guardians* be denied is  
11 hypocritical, at best, as counsel for Ms. Jones at the return hearing on the appointment of temporary  
12 guardianship, requested the temporary guardianship stay in place. See Ms. Jones Objection to  
13 Petition for Attorney's Fees at lines 12-14 on page 4 of 27.

14 7. Ms. Jones was in need of a temporary guardian as a result of many factors previously  
15 articulated in Petitioners' Petition For Attorney's Fees, i.e. Gerry's continued efforts to deny the  
16 efficacy of the POAs, due to the conflicts between Ms. Jones' children and her husband, Gerry,  
17 regarding the safety and continuity of Ms. Jones' care due in part to Gerry's inability to care for  
18 his wife based on his own medical issues, due to the inability for Ms. Jones to interact with her  
19 children again as a result of Gerry seeking medical attention out of state, and due to the transfer or  
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1 her sole and separate property to Gerry's family way below fair market value. A clear need for a  
2 temporary guardianship was recognized by this Court.

3 **II. Petitioners' Attempts to Reduce and Minimize Issues.**

4 8. Counsel for Ms. Jones and counsel for Kimberly Jones in their respective Oppositions,  
5 request that this Court disallow the attorney's fees incurred regarding Petitioners' involvement in  
6 the probate matter as Petitioners failed to file a notice of intent to seek fees until their filing of the  
7 Petition for Appointment of Temporary Guardian on September 19, 2019 .<sup>1</sup> While it is true that  
8 significant time was spent by Petitioners in the probate matter, Petitioners, in an effort to avoid a  
9 costly guardianship and in an effort to provide a least restrictive means for Ms. Jones, made  
10 attempts to meet and confer with not only Kimberly's attorney, David Johnson, Esq., but also  
11 Gerry's attorney, Ty Kehoe, Esq., to settle the matter which, unfortunately, resulted in a  
12 contentious matter among all parties.

13 9. Counsel for Kimberly falsely alleges in his Opposition that counsel for Petitioners *failed*  
14 *to give either Kimberly or the Protected Person advanced notice they would be seeking a*  
15 *temporary guardianship*. See Kimberly's Opposition to Petition for Attorney's Fees at lines 6-7,  
16 page 4 of 7.

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21 <sup>1</sup> Eighth Judicial District Court Case P-19-100166-E regarding the Petition for Confirmation of  
22 Agent under Power of Attorney Pursuant to NRS 162A.330 filed by David C. Johnson, Esq.,  
23 counsel at the time for Kimberly Jones.



10. It is unclear how counsel for Kimberly Jones can allege this when David C. Johnson, Esq. was counsel for Kimberly at or around the time Petitioners filed their Ex Parte Petition for Appointment of Temporary Guardian ("Petition for Appointment of Temporary Guardian"). Petitioners filed their Petition for Appointment of Temporary Guardian on September 19, 2019. On September 12, 2019 at 10:57 a.m., counsel for Petitioner sent an email to David Johnson, Esq. expressing a desire to file a joint petition for temporary guardianship with Kimberly Jones, but in the event that was not possible, informing counsel for Petitioner at the time, David Johnson, Esq., that Petitioners would immediately be filing a petition for guardianship. Mr. Michaelson discussed the filing of a temporary guardianship and potentially general guardianship petition with Mr. Johnson on several occasions.

11. Also, on September 19, 2019, at 10:04 a.m., counsel for Petitioners emailed counsel for Gerry that due to his client's inability to acknowledge the power of attorneys granted to Kimberly, and in an effort to develop a visitation schedule and for financial transparency, counsel for Petitioners would be filing a petition for appointment of temporary guardian to ensure court oversight due to the lack of cooperation of the parties.

III. Any actions by the person or attorney that unnecessarily expanded issues or delayed or hindered the efficient administration of the estate;

12. Counsel for Kimberly and Counsel for Gerry find it appalling that Petitioners are requesting fees and costs over \$60,000 for a *few weeks of a temporary guardianship* but fail to look at their client's respective part in the mounting legal fees. Petitioners expended a great deal of time and

1 money attempting to resolve disputes between all parties involved in this matter without court  
2 intervention. Specifically, they have expended a great deal of time negotiating and conferring with  
3 counsel for the proposed protected person's husband and his family to try to get them to respect  
4 the powers of attorney executed by the proposed protected person. Petitioners then attempted to  
5 work with Kimberly, the designated power of attorney to come up with a care plan for their mother  
6 and establish a visitation schedule to protect their mother and prevent further confusion and  
7 antagonism about visitation and communication with their mother.

8 IV. Petitioners' attorney's fees are just, reasonable and necessary, and  
9 Petitioners were acting in good faith and were actually pursuing the best  
10 interests of the protected person, Ms. Jones.

11 13. When Petitioners intervened to seek a temporary guardianship, the proposed protected  
12 person, Ms. Jones, was in a bad situation due to the actions and inactions of other members of the  
13 family. Despite the fact that Kimberly Jones had a power of attorney ("POA"), she had somehow  
14 allowed Gerry's son-in-law and daughter to obtain ownership of Ms. Jones' residence at 6277  
15 Kraft Avenue, Las Vegas, Nevada 89130 ("the Kraft property"). The situation required Petitioners  
16 to intervene before there was more loss to Ms. Jones' estate, and to make an attempt to recover the  
17 Kraft property for Ms. Jones. Furthermore, Kimberly was the subject of aggressive eviction  
18 proceedings. She is Ms. Jones' (her mother's) caregiver, so this housing uncertainty was a  
19 substantial and immediate situation. Not to mention the threats of police intervention. Gerry's  
20 attorney kept telling the police and FBI that the POA's were dubious, which he had no grounds  
21 for.

1 14. During this process, Petitioners were not only fighting off Gerry, but also Kimberly, who  
2 contested Petitioner's attempt to obtain a temporary guardianship on the basis that a guardianship  
3 over Ms. Jones wasn't necessary because her POA provided Ms. Jones with adequate legal  
4 protection. In hindsight, Gerry and Kimberly claim that Petitioner's claim for attorney's fees and  
5 costs were excessive, but it was their actions and inactions that aggravated the situation and made  
6 the expenditures necessary. And, not only were the expenditures necessary, they were just and  
7 reasonable as well because it was Petitioners' efforts that brought Ms. Jones' plight to the attention  
8 of this Court. Throughout this process, Petitioners have acted in good faith to protect their mother  
9 and her estate from the predations of Gerry's family and Kimberly's inability to defend Ms. Jones'  
10 interests, as reflected in the Court's rulings.

11 15. Petitioners have been more than reasonable in their responses to Ms. Jones' attorneys'  
12 objections to the individual billing charges. For example, even though Ms. Jones' attorneys state  
13 no statute or case to support their contention that \$200 per hour is an excessive billing rate for a  
14 paralegal, Petitioners have conceded this point and agreed to a paralegal rate of \$150 per hour. On  
15 the other hand, Ms. Jones' attorneys' demand that the entirety of each objected to charge be written  
16 off completely, is not reasonable. Where block billing and excessive time have been alleged,  
17 Petitioners have adjusted some of those amounts. This result is fair to all involved, and consistent  
18 with the notion that Petitioners should not be required to bear the entire burden of their efforts to  
19 protect Ms. Jones from other members of the family.  
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1 16. In the light of recent changes occurring in the law of guardianship, this case might set a  
2 precedent should it be appealed by opposing counsel. If the objecting attorneys' argument that all  
3 contested charges be completely eliminated prevails, we could end up with a situation in Nevada  
4 where only the wealthy can afford to protect their loved ones through the guardianship process  
5 because guardians would be forced to pay out of pocket. Also, the Court should bear in mind that  
6 Petitioners are not seeking compensation from Ms. Jones' liquid assets, but only a lien against her  
7 real property so that they can be compensated after her death.

8 17. Petitioners concede, but disagree, that interoffice discussion between attorneys should not  
9 be chargeable to a protected person. Often, such discussions save time as attorneys coordinate and  
10 share information rather than seek answers through independent research. Also, it is necessary for  
11 senior attorneys to supervise junior attorneys and paralegals to accomplish complicated tasks.

12 18. The objecting parties quite often describe attorney tasks as something that could be handled  
13 by a paralegal, and paralegal tasks as something that is secretarial or clerical in nature. With all  
14 due respect, attorneys should be granted some leeway in determining who in a law firm is most  
15 qualified to accomplish a task. It is easy, with 20/20 hindsight, to criticize how each task was  
16 accomplished and by whom, but attorneys need to make these decisions every day, and if they are  
17 acting in good faith, as is the case here, these decisions should be given due deference by this  
18 Court. Accordingly, Petitioners do not concede concerning any of the charges where the objecting  
19 parties criticized what level of employee performed the legal task.  
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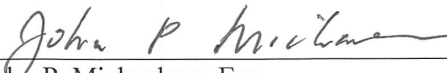
19. Attached hereto as *Exhibit 1* is responses to Ms. Jones' attorney's objections to  
Petitioner's invoices.

### CONCLUSION

20. In their conclusion, Ms. Jones' attorneys request that \$13,908.66 of Petitioners' billing be allowed. Gerry and Kimberly Jones' attorneys request Petitioners not be allowed any of their fees. Petitioners have recalculated paralegal fees at \$150 per hour. Otherwise, in cases where Ms. Jones' attorneys have alleged so-called "block billing" and/or "excess billing," Petitioners suggest that they be allowed to recover the amounts indicated by the adjustments suggested by Petitioners in Exhibit 1 which are just, reasonable and necessary attorney's fees and costs, as indicated line by line in the exhibit to this Response, in the amount of \$ 57,742.<sup>16</sup>.

DATED: March 12, 2020.

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Nevada Bar No. 7822  
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Henderson, Nevada 89052

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5 and NEFCR 9, the undersigned hereby certifies that on March 12, 2020, a copy of the foregoing Response to Kathleen Jones Jones' Objection to Petition for Approval of Attorneys' Fees and Costs and Request to Enter a Judgment Against the Real Property; Opposition filed by Kimberly Jones To Petition for Approval of Attorney's Fees and Costs; and Joinder In Oppositions to Petition for Approval of Attorney's Fees and Costs and Request to Enter a Judgment Against the Real Property of the Estate filed by Rodney Gerald Yeoman was e-served or mailed by USPS regular mail, postage prepaid, in a sealed envelope in Henderson, Nevada to the following individuals and entities at the following addresses:

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MICHAELSON & ASSOCIATES, LTD.

  
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## EXHIBIT 1

-15-



# Invoice No. 12595

Date	Trktr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/10/2019	JPM	450	0.4	\$ 180.00	Phone conference with attorney David Johnson re pros and cons of guardianship petition in this matter.	Under NRS 159.344 (6)(a)(no compensation for internal business activity)-Attorney Johnson is not a party to this matter (he was on the probate matter)	\$ 180.00	This objection is ludicrous. This was a good faith effort to avoid guardianship, advocate for June Jones' safety and meet and confer before filing a petition if that proved necessary.	\$ 0.00
9/10/2019	JPM	450	1	\$ 450.00	Various communications including getting Dr. Brown paid. Draft/edit/revise petition for guardianship.	Under NRS 159.344(5)(i), this task should have been delegated to a paralegal & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 450.00	No. Dr. Brown dropped everything to do this evaluation on an emergency basis. JPM acted prudently to coordinate the doctor's availability on very short notice and ensure he would get paid promptly. This was not appropriate to delegate.	\$ 0.00
9/11/2019	JPM	450	0.7	\$ 315.00	Coordinate with Dr. Brown, including review his report. Client communications.	Under NRS 159.344(5)(i), the first task should have been delegated to a paralegal & Under NRS 159.344(6)(b), no award is to be made for time	\$ 315.00	No. These are all part of one task. The evaluation is pivotal to the entire case. This coordination and review would NEVER be delegated to a	\$0.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
						that is block-billed.		paralegal.	
9/13/2019	LCP	300	2.6	\$ 780.00	Revisions to Petition for Guardianship to reflect clients as Petitioners	Under NRS 159.344(5)(i), time for task is excessive and unreasonable. By this date, LCP had already spent 8.7 hours drafting the Petition for Guardianship.	\$ 600.00	This time was well spent reviewing petition but description is admittedly sparse and likely incomplete. So good work was done but opposing counsel would like to have it go unpaid. Courtesy reduction.	\$200.00
9/13/2019	LCP	300	1	\$ 300.00	Petition for Guardianship; forward draft to JPM for review	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; and description of task is vague. If LCP meant more revisions, time for task is excessive and unreasonable; & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 300.00	The time spent was just, reasonable and necessary. Courtesy reduction.	\$50.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/13/2019	LCP	300	0.4	\$ 120.00	TC with JPM; email to clients re: info needed for Petition	NRS 159.344(5)(b) & Under NRS 159.344 (6)(a)(no compensation for internal business activity) & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 120.00	How does objector conclude this is internal business activities? Attorneys are not required to disclose work product to justify fees. This was time spent analyzing case and preparing pleadings.	\$ 0.00
9/16/2019	LCP	300	2.3	\$ 690.00	Further revisions to Petition for Guardianship	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is no rationale for the revisions (in contrast, in other entries, revisions are made "per client request," which makes sense). NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services	\$ 690.00	Not required to document every reason for every change. Objection is purely speculation. LCP is a quality writer and work is just and reasonable. Courtesy reduction.	\$ 600.00
9/16/2019	LM	200	0.3	\$ 60.00	Begin preparing ancillary documents for appointment of temporary guardianship	NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services	\$ 60.00	This is not a secretarial or clerical task. Billing is just, reasonable, and necessary. Suggest billing be reduced to \$45.	\$ 15.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/16/2019	LCP	300	1	\$ 300.00	Research Temporary vs. Special Guardianship and discuss with JPM review of draft of Petition	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity) & Under NRS 159.344(5)(i), time for task is excessive and unreasonable.	\$ 300.00	This is not block billed. These are obviously not separate items or tasks but one and the same. No internal business activity other than the practice of law. Quality lawyers communicate. It is not always clear at earlier stages which type of guardianship should be sought. In some cases special may be in order. Lawyers research this.	\$ 0.00
9/16/2019	JPM	450	1.6	\$ 720.00	Review draft petition. Edit and revise. Direct team.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity). By this date LCP has already worked on the petition for 13.6 hours.	\$ 720.00	How is block billing assumed here? When lawyer makes changes, frequently he/she directs staff to update handwritten or track change drafts. This case involved many twists and turns from multiple opposing parties and several attorneys.	\$ 0.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/17/2019	LM	200	1.2	\$ 240.00	Continue to Draft all ancillary temporary guardianship documents; draft guardian's acknowledgement of duties; draft citation to appear and show cause for general	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed. And fy, a form is readily available for guardian's acknowledgement of duties, so that paralegal does not have to draft it or reinvent the wheel.	\$ 240.00	Partially conceded. Suggest that billing be reduced to \$90.	\$ 90.00
9/17/2019	LM	200	0.2	\$ 40.00	draft certificate of service for appointment of general guardian	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or	\$ 40.00	Rate reduced as courtesy though no authority cited. This is paralegal work because ensuring proper service is extremely important and can be complex.	\$ 10.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
						clerical services.			
9/17/2019	LCP	300	1.5	\$ 450.00	Further draft Petition for Temporary and General Guardianship	NRS 159.344(5)(b) & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is no rationale listed. With this entry, LCP has worked a total of 15.1 hours drafting and revising the same petition.	\$ 450.00	Two petitions here are involved. Constantly changing facts in this matter. Courtesy reduction.	\$300
9/17/2019	LCP	300	1	\$ 300.00	Further draft Petition for guardianship	Under NRS 159.344(5)(b) & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is no rationale listed. With this entry, LCP has worked a total of 16.1 hours drafting and revising the same petition.	\$ 300.00	Two petitions here are involved. Constantly changing facts in this matter. Courtesy reduction.	\$100.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/17/2019	LCP	300	3.6	\$ 1,080.00	Revisions to Petition; email to clients for review	NRS 159.344(5)(b) & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is no rationale listed for further revisions (in contrast, in other entries, revisions are made "per client request," which makes sense) & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed. With this entry, LCP has worked a total of 19.7 hours drafting and revising the same petition!	\$ 1,080.00	Not required to list rationale or internal thinking for every entry. Courtesy reduction.	\$ 500.00
9/17/2019	JPM	450	3	\$ 1,350.00	Gather facts, research arguments, direct team and draft/edit/revise petition for temp and petition for general guardianship.	Under NRS 159.344(5)(i), the first task should have been delegated to a lower biller; Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344(6)(a)(no compensation for internal business activity).	\$ 1,350.00	No. as reflected by JPM's lesser total hours on virtually all projects, many items are delegated. However, to do a proper job, lead attorney will do some fact gather himself/herself, requires judgment, familiarizes with case. Not to be delegated. This is not block billing but	\$0.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
								relates all to same item.	
9/18/2019	LM	200	0.4	\$ 80.00	Compile exhibits to be attached to ex parte petition for appointment of temporary guardian.	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 80.00	Not secretarial work.	\$ 0.00
9/18/2019	LM	200	0.3	\$ 60.00	Email Robyn and Donna regarding signatures on verifications to ex parte petition and on oath for the Letters of Guardianship	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; an email should be .1.	\$ 45.00	Completely disagree; Courtesy reduction for rate.	\$15.00



Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/18/2019	LM	200	0.3	\$ 60.00	Telephone call and leave message with Teri and Scott regarding our filing for appointment of temporary guardianship	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; each call should be .1. x \$150.	\$ 30.00	Completely disagree. Reduction only for rate as courtesy.	\$15.00
9/18/2019	LM	200	0.4	\$ 80.00	telephone call with Teri regarding her opposing the petition for appointment of temporary guardian	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150.	\$ 20.00	Completely disagree. Reduction only for rate as courtesy.	\$ 20.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/18/2019	LCP	300	2.4	\$ 720.00	Further revisions to Petition: email draft to clients	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is <i>no rationale</i> listed for further revisions (in contrast, in other entries revisions are made "per client request," which makes sense; and I did not object to those) & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed. Important to note: with this entry, LCP has spent 23.7 hours drafting and revising this petition.	\$ 720.00	Not required to list attorney rationale. This work and many other entries concern two related petitions – temp and general.	\$ 0.00
9/18/2019	JPM	450	5	\$ 2,250.00	Gather facts, research arguments, direct team and draft/edit/revise petition for temp and guardianship.	Under NRS 159.344(5)(i), the first task should have been delegated to a lower biller; Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 2,250.00	No. as reflected by JPM's lesser total hours on virtually all projects, many items are delegated. However, to do a proper job, lead attorney will do some fact gather himself/herself, requires judgment, familiarizes with case, not to be delegated. This is	\$ 225.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
								not block billing but relates all to same item. Courtesy reduction.	
9/18/2019	LCP	300	0.9	\$ 270.00	Various tasks associated with finalizing Petition	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed; "various tasks" is too vague as well.	\$ 270.00	This is not block billed. One item – finalizing petition. Not required to show attorney's thinking.	\$ 0.00
9/19/2019	LCP	300	0.1	\$ 30.00	TC with JPM	Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 30.00	This related to matters at hand, could have been more specific.	\$ 30.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/19/2019	LCP	300	0.5	\$ 150.00	revisions to Petition	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; there is <i>no rationale</i> listed for further revisions (in contrast, in other entries revisions are made "per client request," which makes sense). By this billing entry, 18.2 solid hours have already been billed just to <i>revising</i> the Petition for Guardianship. There's more time that can't be deciphered from block- billing entries. And there's more time billed for "drafting" the petition. The final document is 30 pages, plus exhibits.	\$ 150.00	There were two petitions, temp and general. Allocate 1/2 to each if necessary. Lots of moving parts and adverse parties in this litigation.	\$ 0.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/19/2019	LM	200	0.2	\$ 40.00	Filed petition for appointment of temporary guardian	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 40.00	This is not a secretarial or clerical task. Courtesy reduction to \$30.	\$ 10.00
9/19/2019	LM	200	1	\$ 200.00	drafted order granting temporary guardianship	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; the law firm would likely have a template already available for this task that can be recycled.	\$ 100.00	We reduce rate as courtesy. We have templates but every order has to be carefully crafted and reviewed.	\$50.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/19/2019	LM	200	0.2	\$ 40.00	efiled citation to appear and show cause	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 40.00	This is not a secretarial or clerical task.	\$ 10.00
9/19/2019	LM	200	0.3	\$ 60.00	prepared amended citation	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 60.00	This is not a secretarial or clerical task.	\$ 15.00
9/19/2019	LCP	300	0.5	\$ 150.00	Email to clients re status of filing and next steps; sign Citation; review and sign Order	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 150.00	Statute does not preclude curing alleged block billing. Assign .1 to each task.	\$ 60.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/19/2019	JPM	450	1.7	\$ 765.00	Various calls and communications with staff and attorneys for other parties in attempts to meet and confer to resolve claims and also prepare our petition for guardianship-draft/edit/ and revising same.	NRS 159.344(5)(b) & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed	\$ 765.00	Statute does not preclude curing alleged block billing. Assign .1 to each task. Bill as follows: Various calls and communications with staff and attorneys for other parties in attempts to meet and confer to resolve claims (.8) and also prepare our petition for guardianship-draft/edit/ and revising same. (.7)	\$ 0.00
9/20/2019	LM	200	0.2	\$ 40.00	Receipt of email from client with location of her mother	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; an email should be .1.	\$ 25.00	Partially conceded. Suggest reduction to \$15.	\$ 25.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/20/2019	LM	200	0.2	\$ 40.00	email Dave at Servlaw to attempt personal service at the Kraft house address	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; an email should be .1 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services (this is not a legally substantive task).	\$ 40.00	Adjust only for rate as a courtesy.	\$10.00
9/20/2019	LCP	300	0.2	\$ 60.00	TC with JPM re providing advance copy of pleading to opposing counsel	Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 150.00	Counsel for Legal Aid erroneously deducted \$150 instead of the stated amount of \$60. This is conferring on strategy. Not internal business activity.	\$0.00



Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/20/2019	JPM	450	1.3	\$ 585.00	Various communications re obtaining guardianship and noticing other parties, as well as logistics b/w the parties re June's care and including responding to Ty Kehoe's ex parte contact with probate court re POA's that are not being honored, etc...	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344(5)(b), for "ex parte contact with probate court," How does that benefit the protected person?	\$ 585.00	Statute does not preclude curing alleged block billing. Assign .1 to each task. Bill as follows:  Various communications re obtaining guardianship and noticing other parties .3, as well as logistics b/w the parties re June's care .2 and including responding to Ty Kehoe's ex parte contact with probate court re POA's that are not being honored, etc....2	\$270.00
9/23/2019	LM	200	0.2	\$ 40.00	Telephone call with Chryste in Dept. B regarding approval of order granting temporary guardianship	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services	\$ 40.00	Paralegal needs to handle this type of call as paralegal is familiar with case. adjust for rate only.	\$ 10.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
						(this is not a legally substantive task).			
						Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.		This is paralegal work, not secretarial. Calendar calculations are extremely important. We want this done by paralegal. Dates and calendaring in litigated cases are essential. Statute does not define this as secretarial work.	
9/23/2019	LM	200	0.1	\$ 20.00	calendar return date for appointment of temporary guardian		\$ 20.00		\$ 5.00
9/23/2019	LM	200	0.3	\$ 60.00	telephone call with Dave at Servlaw regarding status of service of amended citation and petition upon June Jones (.2); follow-up email from Dave at Servlaw to also serve the order granting the temporary guardianship (.1);	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 60.00	Adjust for rate only. These are extremely important activities, not secretarial.	\$ 15.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/23/2019	LM	200	0.4	\$ 80.00	second telephone call with Chryste regarding faxing over a copy of the order (.2); emailed a copy of the order granting the temporary guardianship to the clients (.2);	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 80.00	Not secretarial. Adjust for rate only.	\$ 20.00
9/23/2019	LM	200	0.3	\$ 60.00	effiled the notice of entry of order granting temporary guardianship and arranged for mailing of same (.2); emailed Dave to also serve the Order Granting the Temporary Guardianship (.1)	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services.	\$ 60.00	Coordinating these items is not secretarial work.	\$ 45.00
9/23/2019	LCP	300	0.4	\$ 120.00	Call from JPM re obtaining Order from Judge's Clerk (.1); call from D. Johnson (.2); communication with JPM re status of Order and message from D. Johnson (.1)	Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 120.00	This is not internal business but legal work by an attorney coordinating with various sides to get important work done.	\$0.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
9/23/2019	JPM	450	0.4	\$ 180.00	Various communications and direction to team re guardianship.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 180.00	Not block billed. Not required to enumerate every aspect of what we do. This case was fast paced. JPM frequently communicated with various parties within minutes of each other about the same issue, then with clients.	\$0.00
9/23/2019	JPM	450	2.2	\$ 990.00	Various communications with client, counsel for Kimberly, counsel for Dick and Gerry. On phone while Robyn visits Kraft house and informs Kimberly of guardianship, to answer questions. Later conversations and emails with clients.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 990.00	This matter was one running item. Trying to resolve issues and get cooperation of all sides who were resisting guardian. NOT block bill.	\$0.00
9/24/2019	LM	200	0.5	\$ 100.00	Emailed a copy of the Letters...(2); arrange to obtain certified copies ...(2); emailed a copy of the Letters...to Ty Kehoe and David Johnson (.1).	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing	\$ 100.00	Not secretarial. Adjust for rate only as courtesy.	\$25.00

Date	Tmkr	Rate	Time	Amount (\$)	Description	Objection	Proposed Reduction	Petitioner's Response	Petitioner's fee reduction proposal
						secretarial or clerical services.			

Total proposed reduction for invoice no. 12595

Total petitioner's proposed amount to be paid

\$ 14,395.00

\$2,740.00

# Invoice No. 12720

Date	Trnkr	Rate	Time	Amount	Description	Objection	Proposed Reduction (\$)	Petitioner's Response	Petitioner's fee reduction proposal
9/25/2019	LM	200	0.6	\$120.00	Receipt of email...regarding obtaining certified copies (.1); Respond to same (.2); prepare receipt of documents (.1); email Robyn that certified copies are ready for pickup (.1); telephone call and leave message with Donna...; efiled affidavit of personal appearance (.1)	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services. These are <i>all</i> secretarial tasks--tasks that are not legally substantive.	\$ 120.00	No, no and no. Secretary not familiar with day to day activities of case. Most appropriate person to coordinate with client is paralegal working the case. ridiculous arm-chair quarterbacking by legal aid. Courtesy adjust for rate only.	\$ 30.00
9/25/2019	LCP	300	1.1	\$ 330.00	Review multiple emails from client; lengthy response email re: duties of guardian	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; maybe a call would have lasted less? & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	\$ 330.00	How does legal aid unilaterally conclude this is block billing? Its not. All relate to one item.	\$0.00

9/25/2019	JPM	450	0.6	\$ 270.00	Review some communications. Phone conference with Robyn. Direct team.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 270.00	How does legal aid unilaterally conclude this is block billing? Its not. All relate to one item.	\$0.00
9/25/2019	LCP	300	0.7	\$ 210.00	Redraft of demand letters to T. Kehoe and D. Johnson per request of R. Friedman.	NRS 159.344(5)(b). How did this task benefit the protected person?	\$ 210.00	This task protected the overall interest of the protected person. This is invalid objection and legal aid should pay fees for having to answer many of these speculative and ridiculous objections. Not required to explain benefit in every entry. See body of response to objections. Lots of harm to protected person, not being adequately addressed by clients of either attorney.	\$ 0.00

9/25/2019	JPM	450	0.7	\$ 315.00	Review of correspondence from Robyn. Direct team re letters to attorneys for other parties. Draft/edit/revise those letters. Send email to client with letter attached.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity) & Under NRS 159.344(5)(b), How did this task benefit the protected person?	\$ 315.00	No block billing. All one item. No internal business activity. Re question: This task protected the overall interest of the protected person. This is invalid objection and legal aid should pay fees for having to answer many of these speculative and ridiculous objections. Not required to explain benefit in every	\$ 0.00
9/26/2019	LCP	300	0.9	\$ 270.00	Revisions to demand letters to T. Kehoe and D. Johnson per client request.	NRS 159.344(5)(b). How did this task benefit the protected person?	\$ 270.00	This task protected the overall interest of the protected person. This is invalid objection and legal aid should pay fees for having to answer many of these speculative and ridiculous objections. Not required to explain benefit in every	\$ 0.00



						entry. See body of response to objections. Lots of harm to protected person, not being adequately addressed by clients of either attorney.	
					Under NRS 159.344(5)(i), time for task is excessive and unreasonable; & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services, regardless of who the biller is. These are all secretarial tasks--tasks that are not legally substantive (transmitting a letter).	Sending letter includes some revisions before sending. Demand letters are critical. Valid time in support of protecting protected person.	
9/26/2019	LCP	300	0.3	\$ 90.00	Send demand letters to opposing counsel	\$ 90.00	\$ 0.00
9/27/2019	AEF	350	0.4	\$ 140.00	Review email from opposing counsel regarding requested items, temporary guardianship and visitation, then review and revise draft response email to opposing counsel regarding same.	This task protected the overall interest of the protected person. This is invalid objection and legal aid should pay fees for having to answer many of these speculative and ridiculous objections. Not required to explain	\$0.00

						person?		benefit in every entry. See body of response to objections. Lots of harm to protected person, not being adequately addressed by clients of either attorney.	
9/27/2019	LM	200	0.2	\$ 40.00	Telephone call with Robyn Friedman regarding email to her sister.	Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive; the most should be \$150 & Under NRS 159.344(5)(g)(4), no compensation for time spent performing secretarial or clerical services (tasks that are not legally substantive).	\$ 40.00	How could legal aid in sincerity conclude this is secretarial? This is bad faith! The paralegal is working this case, is very familiar with the client who frequently calls with questions, this is not secretarial. Rate adjustment is courtesy. Not required to explain legal significance in every entry.	\$ 10.00
9/27/2019	JPM	450	2	\$ 900.00	Numerous communications and emails to/from clients, David Johnson, Ty Kehoe trying to obtain June's identification and other property and resolve visitation issues.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity)-attorney David Johnson is a party in the probate matter, not this	\$ 900.00	Legal aid is incorrect. Not block bill, all one item, part of same conversation about personal property and visitation. These were two issues frequently addressed in the same conversation. David Johnson heavily involved in	\$ 0.00

						guardianship matter.	and after probate matter including guardianship, had knowledge of some facts and whereabouts of items.	
9/27/2019	JPM	450	0.5	\$ 225.00	Later phone call with Ty Kehoe. Call with client.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	No block billing. Call with Ty, report to client. Legal aid knows this and shows insincerity of legal aid objections.	\$ 0.00
9/28/2019	JPM	450	0.8	\$ 360.00	Review of combative Ty Kehoe communication and response thereto. Multiple communications with clients, counsel for Kimberly and Mr. Kehoe.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	No block billing. All portions of these sentences relate to same issues and form a continuum of action.	\$0.00
9/29/2019	JPM	450	0.6	\$ 270.00	Communications with all parties. Setup and participate in phone conference with Kimberly and her attorney.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed.	No block billing. All portions of these sentences relate to same issues and form a continuum of action.	\$ 0.00
9/30/2019	LCP	300	0.3	\$ 90.00	TC with Legal Aid attorney, M. Parra-Sandoval	Under NRS 159.344(5)(i), time for task is excessive and unreasonable; this was a short conversation, and Parra-Sandoval	LCP recorded .3. time not excessive. May have involved some preparation prior to call or afterward. Statute does not require	\$0.00

						recorded a .1 on this date.		recording of literally every separate subpart of an activity.	
10/1/2019	JPM	450	0.2	\$ 90.00	Communication with attorney David Johnson.	Under NRS 159.344 (6)(a)(no compensation for internal business activity)-attorney David Johnson was a party in the probate matter/POA action, not the guardianship matter; and has never appeared on the guardianship matter; & Under NRS 159.344(5)(b). How did this task benefit the protected person?	\$ 90.00	David Johnson involved in early stages of guardianship action. Knowledge of many matters relating to the guardianship. Not required to list in every entry an express statement of benefit to protected person. David knew Kimberly who was supposed to serve as guardian but refused, understood her intentions and communicated with her.	\$ 0.00
10/1/2019	JPM	450	0.5	\$ 225.00	Phone conference with Kimberly's new attorney Jeff Luszeck. Dictation and staff direction.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed & Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 225.00	No block billing. Each phrase is subpart of one item.	\$0.00

10/1/2019	LM	200	0.3	\$	60.00	Review court file for oppositions to petition for appointment of guardianship.	Under NRS 159.344(5)(g)(2) paralegal rate is excessive; the most should be \$150.	\$	15.00	Courtesy adjust for rate.	\$15.00
10/1/2019	LCP	300	0.5	\$	150.00	Draft Notice of Intent to Move Protected Person	Under NRS 159.344(5)(i), time for task is excessive and unreasonable--actual body includes three sentences plus a certificate of service; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services, regardless of who the biller is. This Notice is equivalent to drafting a Notice of Entry of Order, which is a clerical task. There is also a form available.	\$	150.00	Not excessive, no prohibition of attorney doing this work that is part of larger efforts to protect Ms. Jones.	\$ 0.00

					<p>Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive-the most should be \$150; &amp; Under NRS 159.344(5)(i) this is not efficient or cost-effective--instead it is duplicative work (LCP charged .5 at the \$300 rate for reviewing this same document on the same date); &amp; Under NRS 159.344(5)(b) How did this task benefit the protected person? LM did not draft anything from this. LCP is the one that has been drafting and revising documents.</p>			<p>Courtesy adjustment for rate. Ridiculous question in objection from legal aid. This paralegal was very involved in this case. She read to familiarize and contribute her thoughts to attorneys.</p>	
10/2/2019	LM	200	1.4	\$ 280.00	<p>Receipt and review of Ty Kehoe's opposition to petition for appointment of temporary guardian and counter petition for appointment of temporary and general guardian.</p>	\$ 280.00		\$ 70.00	
10/2/2019	JPM	450	4.5	\$ 2,025.00	<p>Communications all day with clients, opposing counsel re hearing prep and efforts to settle issues. Review opposition briefs and supplements thereto.</p>	<p>Under NRS 159.344(6)(b), <i>no award</i> is to be made for time that is block-billed (each task must be itemized with a time).</p>	<p>No block billing. Each phrase relates to the same item – the hearing. Hearings virtually always entail efforts to settle outstanding matters.</p>	\$0.00	

10/3/2019	JPM	450	3.2	\$ 1,440.00	Settlement negotiations at court; client conferences at court; participate in hearing and follow up conversations with clients and opposing attorneys.	Under NRS 159.344(6)(b), <i>no award</i> is to be made for time that is block-billed (each task must be itemized with a time).	\$ 1,440.00	No block billing. Each phrase relates to the same item – the hearing. Hearings virtually always entail efforts to settle outstanding matters.	\$0.00
10/4/2019	LM	200	0.5	\$ 100.00	Receipt of email from Donna to confirm her address and to send future mail to her certified mail (.2); email to Donna and Robyn letting them know certified copies of the Order Extending the Temporary Guardianship are ready for pickup (.3).	Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive-the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these are not legally substantive tasks.	\$ 100.00	Adjustment for rate. This is paralegal work coordinating with clients. Many clients express frustration with getting pawnd off by other firms on secretarial staff who's lack of familiarity and sophistication frustrates clients and actually slows the matter down, despite a lower billing rate.	\$0.00
10/4/2019	LCP	300	0.4	\$ 120.00	Discuss with JPM re: caregiver compensation	Under NRS 159.344 (6)(a)(no compensation for internal business activity).	\$ 120.00	Legal matter in case, planning for potential next steps. Unsure how legal aid saw a basis for claiming internal business activity.	\$0.00
10/4/2019	LCP	300	0.5	\$ 150.00	Incorporate R. Friedman's requests for items into the existing list of demanded items	Under NRS 159.344(5)(i), time for task is excessive and unreasonable, and could have been delegated to a lower	\$ 105.00	This is attorney work.	\$ 0.00

						biller (paralegal \$150 x .3).		
10/4/2019	JPM	450	0.3	\$ 135.00	Communications re compensation for Kimberly as caregiver.	Under NRS 159.344(6)(b), no award is to be made for time that is block- billed (each task must be itemized with a time).	Not block billed, one item.	\$0.00
10/7/2019	LM	200	0.4	\$ 80.00	Review of email from Geraldine Tomich requesting copy of the petition for guardianship (.2); emailed a copy to Ms. Tomich (.2).	Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive-the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not legally substantive tasks.	Not secretarial work. Adjust for rate only as courtesy.	\$ 20.00



10/8/2019	LM	200	0.3	\$ 60.00	Attempt to cal Cindy Sauchak of the Las Vegas Metropolitan Police Department (.1); email Ms. Sauchak regarding setting up a telephone conference with JPM (.1); telephone call with Metro's abuse and neglect (.1)	Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive-the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not legally substantive tasks.	Detective was with elder abuse team. Asked paralegal to explain situation and try to expedite phone conference. Obvious work for a paralegal familiar with the case, not a secretary with no case/issue familiarity or sophistication. Adjust for rate only as courtesy.	\$ 15.00
10/8/2019	JPM	450	0.3	\$ 135.00	Communications with clients and Kimberly's counsel discussing issues and trying to arrange face to face settlement meeting.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized with a time).	Obviously not block billing.	\$0.00
10/8/2019	LM	200	0.7	\$ 140.00	Telephone call with Detective Ludwig at Metro's abuse and neglect unit regarding setting up conference call.	Under NRS 159.344(5)(g)(2) ) paralegal rate is excessive-the most should be \$150; Under NRS 159.344(5)(i), time for task is excessive and unreasonable; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--this task is	Adjust for rate only. Paralegal work because she knows case and issues. Directed her to bring detective up to speed as much as possible and arrange meeting.	\$ 35.00

						not a legally substantive task.			
10/9/2019	JPM	450	2.8	\$ 1,260.00	Continue preparing for settlement conference. Travel to and participate in settlement conference at Kimberly's attorney's office.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized with a time).	\$ 1,260.00	Time is all related and not block billed. Billing is reasonable, just and necessary.	\$ 0.00
<b>Total proposed reduction for invoice no. 12720</b>							<b>\$ 9,960.00</b>	<b>Total Petitioner's proposed amount to be paid</b>	<b>\$195.00</b>

# Invoice No. 12748

1080

Date	Tmkr	Rate	Time	Amount	Description	Objection	Proposed Reduction (\$)	Petitioner's Response	Petitioner's fee proposal
10/10/2019	LM	200	0.6	\$120.00	Drafted notice of intent for Scott Stimmons to appear by telephone at the hearing on October 15th (.5); telephone call and leave message for Scott to confirm the telephone number we can reach him at next week (.1)	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; Under NRS 159.344(5)(i), time for task is excessive and unreasonable--the notice of intent to appear by telephone is a standard document/form is available; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not a legally substantive tasks.	\$120.00	Not block billed, not unreasonable, not excessive and not secretarial. Scott has been key player. Need someone familiar with case/issues to coordinate with him should he answer to get his feedback. Adjust for rate only as courtesy.	\$30.00
10/11/2019	LM	200	0.5	\$100.00	Review of emails received from client to compel opposing party to provide information and documentation on finances and personal information such as passport and medical records (.2); review guardianship statutes regarding petition for instruction (.3).	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150.	\$25.00	Adjust for rate only as courtesy.	\$25.00

10/11/2019	LCP	300	4.2	\$1,260.00	Draft Reply to Opposition	Under NRS 159.344(5)(i) time for task is excessive and unreasonable--LCP spent a total of 12.4 hours working on this Reply, and JPM spent an additional 2.2 on the same pleading. The filed pleading is 18 pages of writing plus exhibits, for a total of 56 pages. A chunk of the reply includes repetitive arguments from the Ex Parte Petition filed on 9-19-2019. The Reply should not have taken an excessive amount of time. If this Court will consider allowing this, it should only be the 2.2 hours for JPM (I did not include those entries as problematic).	\$1,260.00	Not excessive given opposition and difficulty from at times three opposing parties. Courtesy discount.	\$260.00
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					Under NRS 159.344(5)(i) time for task is excessive and unreasonable--LCP spent a total of 12.4 hours working on this Reply, and JPM spent an additional 2.2 on the same pleading. The filed pleading is 18 pages of writing plus exhibits, for a total of 56 pages. A chunk of the reply includes repetitive arguments from the Ex Parte Petition filed on 9-19-2019. The Reply should not have taken an excessive amount of time. If this Court will consider allowing this, it should only be the 2.2 hours for JPM (I did not include those entries as problematic).		Not excessive given opposition and difficulty from at times three opposing parties.	
10/11/2019	LCP	300	0.5	\$ 150.00	Draft Reply to Opposition	\$ 150.00	Courtesy rate adjustment. Paralegal reviewed, important pleading. Not same as LCP's work/pleading.	\$ 0.00
10/11/2019	LM	200	0.8	\$ 160.00	Prepare response to counter petition for guardianship	\$ 160.00		\$40.00

10/11/2019	LM	200	0.6	\$	120.00	filing response before Tuesday's hearing and preparing a notice of move (.2); prepared a notice of move; efiled and eserved same with the court (.4).	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not legally substantive tasks; & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed-latter entry.	Paralegal involvement is important. Higher skill level ensures accuracy. Adjust for rate only as courtesy.	\$30.00
10/11/2019	LCP	300	1.7	\$	510.00	Work on Reply to Opposition	Under NRS 159.344(5)(i) time for task is excessive and unreasonable--LCP spent a total of 12.4 hours working on this Reply, and JPM spent an additional 2.2 on the same pleading. The filed pleading is 18 pages of writing plus exhibits, for a total of 56 pages. A chunk of the reply includes repetitive arguments from the Ex Parte Petition filed on 9-19-2019. The Reply should not have taken an excessive amount of time. If this Court will consider allowing this, it should only be the 2.2 hours for JPM (I did not include those entries as problematic).	Not excessive given complexity of this case due to intransigence of other parties.	\$0.00

10/12/2019	JPM	450	3.5	\$ 1,575.00	Review numerous pleadings and communications and draft/edit/revise response pleading. Communications with client and team re the same.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized with a time); & Under NRS 159.344 (6)(a)(no compensation for internal business activity)	\$ 1,575.00	Tasks relate to same pleading. Courtesy adjustment reduction to \$787.50.	\$787.50
10/13/2019	LCP	300	2.6	\$ 780.00	Work on Reply to Opposition	Under NRS 159.344(5)(i) time for task is excessive and unreasonable--LCP spent a total of 12.4 hours working on this Reply, and JPM spent an additional 2.2 on the same pleading. The filed pleading is 18 pages of writing plus exhibits, for a total of 56 pages. A chunk of the reply includes repetitive arguments from the Ex Parte Petition filed on 9-19-2019. The Reply should not have taken an excessive amount of time. If this Court will consider allowing this, it should only be the 2.2 hours for JPM (I did not include those entries as problematic).	\$ 780.00	Not excessive given complexity of this case due to intransigence of other parties.	\$ 0.00

10/13/2019	JPM	450	0.2	\$	90.00	Review some emails and direct team on draft of response.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized with a time); & Under NRS 159.344 (6)(a)(no compensation for internal business activity)	\$	90.00	Not block billed. Frequently had multiple emails re same item. Not required to disclose thoughts. Items relate to case not internal firm business.	\$0.00
10/14/2019	LCP	300	1.5	\$	450.00	Work on Reply to Opposition	Under NRS 159.344(5)(i) time for task is excessive and unreasonable--LCP spent a total of 12.4 hours working on this Reply, and JPM spent an additional 2.2 on the same pleading. The filed pleading is 18 pages of writing plus exhibits, for a total of 56 pages. A chunk of the reply includes repetitive arguments from the Ex Parte Petition filed on 9-19-2019. The Reply should not have taken an excessive amount of time. If this Court will consider allowing this, it should only be the 2.2 hours for JPM (I did not include those entries as problematic).	\$	450.00	Not excessive given complexity of this case due to intransigence of other parties.	\$0.00



10/14/2019	LCP	300	0.9	\$ 270.00	Gather and assemble documents that will be attached as exhibits to Reply.	Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services (regardless of who the biller is)--tasks that are not legally substantive.	\$ 270.00	This is not secretarial or clerical task. Billing is reasonable, just and necessary. Requires lawyer reasoning to consider which facts and docs to include.	\$ 0.00
10/14/2019	LM	200	0.3	\$ 60.00	Telephone call with Robyn Friedman and Donna to sign the respective verification pages to reply	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not legally substantive tasks.	\$ 60.00	This is not a secretarial or clerical task. Billing is reasonable, just and necessary. Paralegal can best answer client questions. Adjust for rate only as courtesy.	\$15.00
10/14/2019	LM	200	1.7	\$ 340.00	draft order granting petition for appointment of general guardian	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(i), time for task is excessive and unreasonable, and not cost-efficient. This is work done prematurely. A general guardianship was never granted to these parties and thus this order could never have been filed.	\$ 340.00	Adjust rate. Being prepared with order is not premature. But for Kimberly's reluctant and forced cooperation, general in favor of Robyn and Donna would have been granted. This was being prepared.	\$85.00

10/14/2019	JPM	450	2.5	\$ 1,125.00	Draft/edit/revise supplement and prepare arguments for hearing tomorrow.	Under NRS 159.344(5)(i), first task related to the supplement (which was really just a verification of service) should have been delegated to a lower biller/paralegal; & Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized with a time).	\$ 1,125.00	Supplemental arguments relate to the hearing and preparation therefore. These are not disparate block billed items but part of the same item – presentation of arguments at the hearing.	\$0.00
10/15/2019	LM	200	0.4	\$ 80.00	Receipt of email from Geri Tomich regarding scheduling at 2:00 p.m. meeting with JPM (.2); respond to same and calendar (.2).	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(i), time for task is excessive and unreasonable; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks are not legally substantive tasks.	\$ 80.00	Courtesy adjustment to rate. Would take more time to redirect these items to secretary. Better use of time and better result working through these items through paralegal familiar with case. This benefits June Jones.	\$20.00

10/15/2019	LM	200	0.4	\$	80.00	Telephone call with Sharon Coates regarding latest version of the care plan ... (.2); receipt and review of Rule 6 the initial guardianship care plan rule (.2)	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--the telephone call is not a legally substantive task.	\$	50.00	This is completely legally substantive. Incorporating latest rules and thinking from guardianship commission. Adjust rate as courtesy.	\$ 20.00
10/15/2019	LM	200	0.6	\$	120.00	Prepared supplement to reply to oppositions to include executed verification of clients (.4); efiled and mailed same (.2).	Under NRS 159.344(5)(g)(2) paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these tasks- preparing documents to file, efilng, and mailing are not a legally substantive tasks.	\$	120.00	Legitimate paralegal work to ensure continuity and accuracy. Adjust rate as courtesy.	\$ 30.00
10/15/2019	JPM	450	5.2	\$	2,340.00	Prepare for hearing. Participate in hearing including client conferences and negotiations.	Under NRS 159.344(6)(b), no award is to be made for time that is block-billed (each task must be itemized separately, with a time).	\$	2,340.00	These are not disparate items but part of the same item -- the hearing. The focus is negotiating and getting the result. Not stopping to scribble notes throughout the	\$ 0.00

							morning to document moment by moment the actual time spent walking in and out of the courtroom, writing down an argument. These tasks are contiguous and part of the same item that day.	
10/18/2019	LM	200	0.2	\$ 40.00	Review court file for order regarding hearing; calendared evidentiary hearing and return investigator's report.	Under NRS 159.344(5)(g)(2), paralegal rate is excessive--the most should be \$150; & Under NRS 159.344(5)(g)(4) no compensation for time spent performing secretarial or clerical services--these are not legally substantive tasks.	Legitimate paralegal work to ensure continuity and accuracy. Adjust rate as courtesy.	\$ 10.00
					<b>Total proposed reduction for invoice no. 12748</b>	<b>\$9,715.00</b>	<b>Total Petitioner's proposed amount to be paid</b>	<b>\$1,352.50</b>